Nuneaton & Bedworth
United to Achieve

Nuneaton and Bedworth Borough Council
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Date: 1st September 2026

Dear Sir/Madam,

A meeting of the **CABINET** will be held in the Council Chamber, Town Hall, Nuneaton, on **Wednesday, 9th September 2026** at **6.00 p.m.**

Yours faithfully,

Tom Shardlow

Chief Executive

To: Members of Cabinet

Councillor G. Finch (Leader) (Chair)
Councillor M. Bannister (Deputy Leader and Resources and Internal Affairs)
Councillor J. Bartlett (Housing)
Councillor S. Coates-Jarman (Planning, Enforcement and Public Services)
Councillor P. Gilbert (Finance)
Councillor J. Groves (Town Centre Regeneration and Business Development)
Councillor B. Greenwood (Leisure and Health)

Observer:
Councillor B. Hughes (Leader of the Main Opposition Group)

The Council is committed to providing a safe and respectful environment for our employees, customers and elected members. As such, please be advised that any form of abuse, aggression, or disrespectful behaviour towards our team will not be tolerated under any circumstances.

AGENDA

PART I

PUBLIC BUSINESS

1. EVACUATION PROCEDURE

A fire drill is not expected, so if the alarm sounds, please evacuate the building quickly and calmly. Please use the stairs and do not use the lifts. Once out of the building, please gather outside the Lloyds Bank on the opposite side of the road.

Exit by the door by which you entered the room or by the fire exits which are clearly indicated by the standard green fire exit signs.

If you need any assistance in evacuating the building, please make yourself known to a member of staff.

Please also make sure all your mobile phones are turned off or set to silent.

2. APOLOGIES - To receive apologies for absence from the meeting.

3. DECLARATIONS OF INTEREST

To receive declarations of Disclosable Pecuniary and Other Interests, in accordance with the Members' Code of Conduct.

Declaring interests at meetings
If there is any item of business to be discussed at the meeting in which you have a disclosable pecuniary interest or non- pecuniary interest (Other Interests), you must declare the interest appropriately at the start of the meeting or as soon as you become aware that you have an interest.

Arrangements have been made so that interests that are declared regularly by members can be viewed in a schedule on the Council website (Councillor Declarations of Interests) Any interest noted in the schedule on the website will be deemed to have been declared and will be minuted as such by the Democratic Services Officer. As a general rule, there will, therefore, be no need for those Members to declare those interests as set out in the schedule.
There are, however, TWO EXCEPTIONS to the general rule:

1. When the interest amounts to a Disclosable Pecuniary Interest that is engaged in connection with any item on the agenda and the member feels that the interest is such that they must leave the room. Prior to leaving the room, the member must inform the meeting that they are doing so, to ensure that it is recorded in the minutes.
2. Where a dispensation has been granted to vote and/or speak on an item where there is a Disclosable Pecuniary Interest, but it is not referred to in the Schedule (where for example, the dispensation was granted by the Monitoring Officer immediately prior to the meeting). The existence and nature of the dispensation needs to be recorded in the minutes and will, therefore, have to be disclosed at an appropriate time to the meeting.

Note: Following the adoption of the new Code of Conduct, Members are reminded that they should declare the existence and nature of their personal interests at the commencement of the relevant item (or as soon as the interest becomes apparent). If that interest is a Disclosable Pecuniary or a Deemed Disclosable Pecuniary Interest, the Member must withdraw from the room.

Where a Member has a Disclosable Pecuniary Interest but has received a dispensation from Audit and Standards Committee, that Member may vote and/or speak on the matter (as the case may be) and must disclose the existence of the dispensation and any restrictions placed on it at the time the interest is declared.

Where a Member has a Deemed Disclosable Interest as defined in the Code of Conduct, the Member may address the meeting as a member of the public as set out in the Code.

Note: Council Procedure Rules require Members with Disclosable Pecuniary Interests to withdraw from the meeting unless a dispensation allows them to remain to vote and/or speak on the business giving rise to the interest.

Where a Member has a Deemed Disclosable Interest, the Council's Code of Conduct permits public speaking on the item, after which the Member is required by Council Procedure Rules to withdraw from the meeting.

4. MINUTES - To confirm the minutes of the Cabinet meeting held on the 15th July 2026 **(PAGE 7).**

5. PUBLIC CONSULTATION – Members of the Public will be given the opportunity to speak on specific agenda items, if notice has been received.

   Members of the public will be given three minutes to speak on a particular item and this is strictly timed. The Chair will inform all public speakers that: their comments must be limited to addressing issues raised in the agenda item under consideration: and that any departure from the item will not be tolerated.

   The Chair may interrupt the speaker if they start discussing other matters which are not related to the item, or the speaker uses threatening or inappropriate language towards Councillors or officers and if after a warning issued by the Chair, the speaker persists, they will be asked to stop speaking by the Chair. The Chair will advise the speaker that, having ignored the warning, the speaker's opportunity to speak to the current or other items on the agenda may not be allowed. In this eventuality, the Chair has discretion to exclude the speaker from speaking further on the item under consideration or other items of the agenda.

6. PINGLES DECARBONISATION CLOSURE – a report of the Assistant Director – Recreation and Culture attached **(PAGE 14)**

7. CULTURE UPDATE - a report of the Assistant Director – Recreation and Culture attached **(PAGE 29)**

8. HOUSING ALLOCATION POLICY AMENDMENTS – a report of the Assistant Director – Housing Services **(PAGE 36)**

9. POOL BANK CAR PARK – a report of the Communities Manager attached **(PAGE 83)**

10. PRIDE IN PLACE IMPACT FUND – PROJECTS UPDATE a report of the Assistant Director – Economy and Regeneration to follow.

11. LOCAL COUNCIL TAX REDUCTION SCHEME TO BANDED SCHEME CONSULTATION a report of the Assistant Director – Finance **(PAGE 88)**

12. CONSIDERATION OF ARTICLE 4 DIRECTION AND SELECTIVE LICENSING FOR HOUSES IN MULTIPLE OCCUPATION report of the Assistant Director – Planning and Assistant Director – Environment & Enforcement **(PAGE 103)**

13. GENERAL FUND BUDGET MONITORING Q1 a report of the Assistant Director – Finance **(PAGE 180)**

14 HOUSING REVENUE ACCOUNT BUDGET MONITORING Q1 a report of the Assistant Director – Finance **(PAGE 188)**

15. CAPITAL MONITORING Q1 a report of the Assistant Director – Finance **(PAGE 195)**

16. RECOMMENDATIONS FROM OVERVIEW AND SCRUTINY PANEL
None

17. ANY OTHER ITEMS **-** which in the opinion of the Chair of the meeting should be considered as a matter of urgency because of special circumstances (which must be specified)

Nuneaton and Bedworth Borough Council
Corporate Plan
Building Communities 2025 – 2029

United in Achievement.

Theme 1: Place and Prosperity

Strategic Aims:

1. Regenerate Nuneaton Town Centre; completing the Transforming Nuneaton Programme.
2. Establish an increased number of residential properties within the Town Centres
3. Help local businesses thrive, support new business incubation and reduce the number of vacant units.
4. Continue to promote and enable events across the Borough.
5. Continue to develop and help our markets to thrive.
6. Work with the business community to strengthen business in the whole Borough
7. Deliver a regeneration plan for Bedworth Town Centre.
8. Promote, and support our Town Centre economies.

Theme 2: Housing, Health and Communities

Strategic Aims:

1. Deliver the construction and opening of the Bedworth Physical Activity Hub (BPAH).
2. Focus on awareness and promotion of support services for mental health and wellbeing.
3. Facilitate warm, safe, sustainable and affordable housing.
4. Work with public health colleagues and partners to address community inequalities.
5. Promote active travel across the Borough.
6. Extend the housing home building programme to provide more Council homes.
7. Work with partners to prioritise community safety and empowerment.

Theme 3: Green Spaces and Environment

Strategic Aims:

1. Review the grounds maintenance contract for the Borough.
2. Celebrate the heritage within our green spaces, including museums, George Eliot and local industry.
3. Decarbonise our housing stock and promote the decarbonisation of homes in the private sector.
4. Support our residents to recycle more of their household waste.
5. Promote and develop play area facilities in line with the Parks and Green Space Strategy.
6. Reduce the carbon footprint of the Pingles Leisure Centre by 2026.
7. Establish a Climate Change Strategy and Delivery Plan by 2026.
8. Work with partners to improve air quality across the Borough.
9. Explore opportunities to promote, protect and enhance biodiversity in the borough.

Theme 4: Your Council

Strategic Aims:

1. Conduct a Local Government Association Peer Review by 2026.
2. Increase the level of resident engagement and consultation.
3. Deliver a refreshed Council change plan to modernise services.
4. Focus on civic pride, celebrating rich heritage and diverse communities.
5. Deliver continued forward financial planning to safeguard the finances of the Council.
6. Set ambitious and challenging budgets, to ensure taxpayers money is respected, and high-quality services are delivered.
7. Deliver a modern organisation with agile and effective structure that meet the needs of residents.
8. Strive for transparency and accountability in all that we do. Increase public scrutiny.

NUNEATON AND BEDWORTH BOROUGH COUNCIL

CABINET **15th July 2026**

A meeting of Cabinet was held on Wednesday 15th July 2026 in the Council Chamber at the Town Hall.

Present

Councillor M. Bannister (Deputy Leader and Finance, Enabling Services and Communities) (Chair)
Councillor J. Bartlett (Housing)
Councillor S. Coates-Jarman (Planning, Enforcement and Public Services)
Councillor J. Groves (Town Centre Regeneration and Business Development)
Councillor B. Greenwood (Leisure and Health)

A minute silence was held to mark the passing of Anne Widdecombe former MP for Maidstone and The Weald and acknowledging her contribution to public life.

CB19 **Apologies**
Councillor G. Finch (Leader)

CB20 **Declarations of Interest**
RESOLVED that the Declarations of Interest for this meeting are as set out in the Schedule published on the website.

CB21 **Minutes**
RESOLVED that the minutes of the Cabinet meeting held on 17th June 2026, be approved, and signed by the Chair

CB22 **New Administration 100 Day Priorities**
The Chief Executive submitted a report setting out the initial priorities of the new Administration for the first 100 days and provide an update on early progress whilst seeking the necessary approvals to enable further development.

RESOLVED that

a) the priorities detailed within the report and the progress made to date be noted;

b) the ongoing commitment to fostering a culture of openness and transparency in decision-making, financial management, and governance be acknowledged;

c) delegated authority be given to the Strategic Director (Resources), in consultation with the relevant Portfolio Holder, to explore options for improving access to Council services in Bedworth and Bulkington and to bring forward any proposals requiring further approval through the Council’s normal governance arrangements;

d) delegated authority be given to the Strategic Director (Communities and Place), in consultation with the relevant Portfolio Holder, to commission a review of the Housing Allocations Policy, including consideration of how the needs of Borough residents may be prioritised within the relevant legal framework;

e) delegated authority be given to the Strategic Director (Communities and Place) to produce a delivery plan to improve turnaround times for Council housing and commercial lettings voids;

f) it be recommended to Full Council that the Climate Change Emergency declared in 2019 be rescinded, and that associated funding be redirected toward practical measures that mitigate the impacts of severe weather and enhance and protect the Borough's natural environment;

g) the Strategic Director (Culture and Environment), in consultation with the relevant Portfolio Holder, prepares a report for consideration by Full Council on the viability, evidence requirements, legal implications and resource implications of introducing Article 4 Directions and/or selective licensing to manage Houses in Multiple Occupation within the Borough; and

h) the wider medium-term ambitions of the Administration beyond the initial 100-day period be noted.

SPEAKER:
Linda Parsons
Elissa Novak
Councillor Brady Hughes
Councillor Keith Kondakor
Councillor Michele Kondakor
Councillor Chris Watkins
Councillor Mike Wright

Options

- Do nothing – Rejected - because it would not enable Cabinet to progress the priorities set out in this report.

Reasons

This report sets out a clear and deliverable programme for the first 100 days of the New Administration, reflecting the priorities of local residents and establishing a strong foundation for longer-term change.

CB23 **Adoption of Revised Private Sector Housing Enforcement Policy**

The Assistant Director for Environment & Enforcement submitted the revised Private Sector Housing Enforcement Policy, aligned with the requirements of the Renters' Rights Act 2025 for adoption.

RESOLVED that

a) the proposed new Enforcement Policy drafted by the Association of Chief Environmental Health Officers (ACEHO), to take effect from 1 May 2026 with transitional arrangements in place to ensure legal and procedural continuity be adopted

b) delegated authority be given to for the Strategic Director of Culture and Environment, in consultation with the relevant Portfolio Holder, to approve minor modifications to the policies and to incorporate new secondary legislation as it comes into force under subsequent phases of the Renters' Rights Act.

SPEAKERS:
None

Options:

- Do nothing – rejected - There is a risk that failure to adopt updated enforcement and civil penalty policies aligned with the Renters' Rights Act could result in the Council being unable to demonstrate compliance with its statutory duty to enforce landlord legislation under Section 107.

Reasons:
Statutory Duty to enforce landlord legislation under Section 107

CB24 **Special Projects Resource**
A report of the Assistant Director – Planning sought Cabinet approval to utilise £70k of funds from the Financial Planning Reserve to secure resource to deal with a number of special projects.

RESOLVED that

a) £70,000 of the Financial Planning Reserve can be utilised for the appointment of resource to progress the special projects be approved;

b) delegated authority be given to the Head of Paid Service and the S151 Finance Officer to draw down the £70,000 from the Financial Planning Reserve.

c) the appointment of resource to progress the special projects for the 2026/27 financial year be approved;

d) a further report be brought back to Cabinet with the outcomes of the special projects work undertaken.

SPEAKERS:
Councillor Keith Kondakor
Councillor Tony Venson

Options:

- To not proceed with the creation of resource for the special projects and to reject the recommendations set out in the report – Rejected – the Council must resolve some of the legacy matters the Planning team are currently dealing with to remove any risk associated with them not being concluded. It is also advantageous to the Council to investigate additional potential sources of income for the Planning Service, and review the charges currently made by the Local Land Charges service and Street Naming and Numbering Service.

Reasons:
To resolve of legacy matters, and positive initiatives to move the Planning service forwards.

CB25 **Regeneration Projects Update and Regeneration Review**
The Assistant Director – Economy & Communications submitted to Cabinet an update on the progress of regeneration projects taking place within the Borough and to consider an amendment to Pride in Place Impact Fund (PIPIF) allocations.

RESOLVED that

a) the allocation of the Pride in Place Impact Fund (PIPIF), as detailed at Section 12 was considered and confirm the final allocation as follows:
45% Nuneaton
45% Bedworth
5% Bulkington
5% Keresley;

b) the design amendment to the Parks Revival project be approved, as detailed at Section 11.3;

c) delegated authority be given to the Strategic Director, Communities & Place, in consultation with the Portfolio Holder for Town Centre Regeneration and Business Development, to develop funding schemes for the PIPIF in line with the public consultation feedback, attached as Appendix A of the report;

d) the Regeneration Review, attached as Appendix B of the report be noted.

SPEAKERS:
Councillor Keith Kondakor
Councillor Nicki King
Councillor Michele Kondakor
Councillor Jeff Clarke
Councillor Brady Hughes
Councillor Tony Venson

Options:
Do nothing – Rejected – In relation to the Parks Revival project, the failure to amend the project design would mean that additional funding would be required. This option was rejected as no other funding availability was identified.

Reasons:
To provide an update on the position of the Regeneration Projects.

CB26 **General Fund Outturn Revenue 2025/26**
The Assistant Director for Finance submitted a report to Cabinet to present the final outturn position for 2025/26 and for approval of the earmarked reserve balances at 31st March 2026

RESOLVED that

a) the 2025/26 outturn position for the General Fund be noted; and

b) the earmarked reserve balances as detailed in Appendix 2 of the report be noted and approved.

SPEAKERS:
Councillor Keith Kondakor

Options:

- Do nothing – Rejected - Reporting the outturn position is key for transparency therefore this is not an option.

Reasons
The Council has a duty to report the financial position of its budget.

CB27 **Housing Revenue Account (HRA) Revenue Outturn 2025/26**
The Assistant Director for Finance submitted a report to Cabinet to present the final outturn position for 2025/26 and for approval of the earmarked reserve balances at 31st March 2026

RESOLVED that

a) the 2025/26 outturn position for the HRA be noted; and

b) the reserve balances as details in Appendix 2 of the report be approved.

SPEAKERS:
Councillor Keith Kondakor

Options:

- Do nothing – Rejected - Reporting the outturn position is key for transparency therefore this is not an option.

Reasons
The Council has a duty to report the financial position of its budgets.

CB28 **Capital Outturn 2025/26**
The Assistant Director for Finance submitted a report to Cabinet to update on the outturn position on capital expenditure for both the General Fund and Housing Revenue Account (HRA)

RESOLVED that

a) the 2025/26 outturn position for the Capital budget be noted; and

b) the Capital reserve position at the end of 2025/26 be noted.

c) it be recommended to Council that the updated Capital Budget for 2026/27 as detailed in Appendix 2 of the report be approved.

SPEAKERS:
None

Options:

- Do nothing – Rejected - Reporting the outturn position is key for transparency therefore this is not an option.

Reasons
The Council has a duty to report the financial position of its budgets.

CB29 **Collection Fund Outturn 2025/26**
The Assistant Director for Finance submitted a report to Cabinet to present the final Collection Fund outturn position for 2025/26.

RESOLVED that the Collection fund position as detailed in the report be noted

SPEAKERS:
None

Options:

- Do nothing – Rejected - Reporting the outturn position is key for transparency therefore this is not an option.

Reasons
The Council has a duty to report the financial position of its budgets.

CB30 **Recommendations from Overview and Scrutiny Panels**
a) Business, Regeneration and Planning OSP – 11th June 2026
At its meeting a Regeneration Projects Update was provided to the panel and a recommendation put forward for Cabinet consideration as follows:

'It be recommended to Cabinet that any outstanding leases be reviewed'

The Chair of the Business, Regeneration and Planning OSP presented the recommendation and expressed his concern on monies being spent without leases in place presenting a risk to this Council. The Chair expressed concern in relation to the Abbey Theatre lease and to the lack of information coming forward on the leases. The Chair expressed that a further report on the progress would be welcomed as soon as possible and that the OSP would continue to monitor the regeneration projects.

Cabinet considered the recommendation put forward and acknowledged the concerns brought forward by the Chair of the Business, Regeneration and Planning OSP.

RESOLVED that the outstanding leases be reviewed.

SPEAKER: Councillor Keith Kondakor

CB31 **Any Other Items**
None

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Chair

PUBLICATION DATE: 22ND JULY 2026

DECISIONS COME INTO FORCE: 30TH JULY 2026

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 6

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Cabinet

Date of Meeting: 9th September 2026

Subject: Pingles Decarbonisation Project Closure Update

Portfolio: Leisure and Health

Responsible Officer: Assistant Director – Recreation and Culture

Corporate Plan – Theme: Green Spaces and Environment

Corporate Plan – Aim: Reduce the carbon footprint of the Pingles Leisure Centre by 2026.

Ward Relevance: Attleborough / Borough Wide

Public or Private: Public

Forward Plan: Yes

Subject to Call-in: Yes

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1. Purpose of report

1.1 To update Cabinet following the completion of the Decarbonisation of the Pingles Leisure Centre and Pingles Stadium, following successful funding from Sport England and Salix to install PV panels, pool covers and heat source technology.

2. Recommendations

2.1 That Cabinet note the project completion update on the Pingles Decarbonisation project.

3. Background

3.1 Following a successful funding application to the Public Sector Decarbonisation Scheme (PSDS) 3c scheme in early 2024, the Council successfully received £3.8million to fund heat decarbonisation and energy efficiency measures at the Pingles Leisure Centre and Pingles Athletic Track facilities.

3.3 Additional to this the Council successfully secured just over £400k from Sport England through the Swimming Pool support fund, to implement energy saving measures through PV Panels and Pool Covers at Pingles Leisure Centre and Pingles Stadium.

3.4 The purpose of the Pool Covers are to retain heat overnight and when the pool is closed: this means the heating system does not need to work as hard to bring the pool back up to temperature as they reduce evaporation.

3.5 PV panels, also known as photovoltaic panels, are solar panels that convert sunlight into electricity. Their installation at the Leisure Centre and Athletics Track supports the project's aim to reduce energy consumption, lower carbon emissions and improve the long-term sustainability of the site.

3.6 Due to the timing of both these funding opportunities coming to fruition, both projects where combined to deliver the wider Decarbonisation project at Pingles Leisure Centre and Stadium.

3.7 A project team was mobilised to ensure effective expertise and capacity was allocated to the project. AtkinsRealis was appointed as Project Managers following a tendering exercise.

3.8 The NBBC submission to Gov't / Salix for funding, supported the decision-making process around the obsolete Pingles heating and ventilation systems. The Pingles was built just over 21 years previously and required capital investment. The match funding elements required by NBBC against the grant fund provided significant sustainability and ROI returns.

4. <u>Body of report and reason for recommendations</u>

4.1 This report provides closure to the project and an update to Cabinet, with all necessary proformas completed and signed off by the Councils 151 officer and agreed with the funders.

4.2 Annual monitoring returns will be required for the following three years back to the funder to evidence work undertaken has achieved the reported outcomes.

5. <u>Project Summary</u>

5.1 In July 2024 the first element of the project was completed with the installation of the Pool Covers at Pingles Leisure Centre as part of the successful Sport England funding.

5.2 The PV panel installation started in late 2024. There was a delay in completion of the PV panel installation at the Leisure Centre due to repairs required to structural columns at the site. The panels went live at both the Leisure centre and the Athletic track on Friday 3rd July 2026. This includes 23 panels at the Track and 750 panels on the Leisure centre.

5.3 Members may recall that remedial works had to be arranged for internal steels in the leisure water area, to ensure structure integrity. These works delayed the project and installation of the PV panels until on this area of the roof until early 2026.

5.4 The installation of heat source pumps and an internal coil systems supporting the buildings heating and ventilation was completed at both the Leisure Centre and Track site reducing the need for gas heating systems. This was commissioned in early June 2026.

5.5 The project required a new connection being made to the electricity grid. This included new substation infrastructure at the Track site. This also caused a delay to the project and necessary testing, approvals and sign offs. This new substation supports just the leisure facilities on site, no other users.

5.6 A new fenced compound has been installed external to the Leisure centre to house the new equipment, as well as an additional compound for the Athletics Track equipment.

5.7 As part of the Biodiversity Management Plan (BMP) the Council planted 28 trees within the Riversley Park in March and April 2026 to meet the BMP requirements.

5.8 Additional works completed throughout the project included the replacement of all the pool plate heat exchangers and all the associated valves to ensure they are compatible long term with the new equipment and an update to the existing Building Management System (BMS) to ensure compatibility with the new systems.

5.9 Working with internal colleagues from Corporate Property Maintenance and Finance we have replaced identified obsolete equipment as part of these overall works, to reduce exposure to NBBC, taking into consideration the new Leisure Management Contract which commenced on 1st April 2026.

6. Project Challenges

6.1 The project had several challenges to overcome throughout:

6.1.1 Due to emergency structural works at the Pingles site in relation to Steel Columns that occurred in late 2024 this impacted a small section of the facility leading to 15% of the PV panel installation being delayed until 2026. Officers worked closely with funding partner Sport England during this time. This did require a stop notice having to be issues which was an additional cost to the project of around £23k.

6.1.2 As previously reported to Cabinet there where some unknown challenges in delivering this project, which at the time of the Councils application for Government funding was not known, particularly around the electrical supply / new substation requirement and power fluctuations.

6.1.3 As part of the connection to the Distribution Network Operator (DNO), the supplier National Grid undertook a Power Quality Monitoring assessment late summer 2025 following the Council's application. The assessment was undertaken against the existing Pingles / Track site and identified existing power fluctuations outside the networks 5% tolerance. Therefore, there was the requirement by National Grid for Active Harmonic Filtration equipment to be included, to address the fluctuations of power for the Council to connect to the substation and meet necessary funding timelines to deliver the overall project. This had a financial implication to the project and Council of £178,285.

6.1.4 In March 2026, the newly installed heat source pump to supply the Athletics Track was damaged and parts removed via an act of vandalism. Works to reinstate and fully secure this site are now complete with additional security measures also increased.

7. Project Outcome

7.1 Appendix A to this report provides a summary / dashboard update on outcomes on how this project will support the Pingles Leisure site, being sustainable moving forward.

7.2 The project team met with pupils and staff from Wembrook Primary School who are their Science Ambassadors, to present the Pingles Decarbonisation project to the class and give them a tour of the equipment onsite as part of their curriculum and a real-life project example.

7.3 Feedback from the Head teacher and pupils has been very complimentary and will be something we have offered to support moving forward.

8. Consultation with the Public, Members, Officers and Associated Stakeholders

8.1 Consultation has been undertaken with the Portfolio Holder/s, Cabinet Members, Strategic Directors and Assistant Directors in relation to items detailed within the report and throughout the project progress including cabinet updates throughout.

9. Financial Implications

9.1 The project had two external funders Sport England (£391,397 – PV Panels and pool cover) and the other through the governments Public Sector Decarbonisation fund (£3,444,860 – Heat source pumps) the remaining was funded via Council's match funding as required as part of the application submission.

9.2 Due to some of the challenges (unknown at the time of application submission) identified in points 5.5 and 6.1.3 the project exceeded the original budget figure. Reports to Cabinet provided updates on these required additions and Cabinet approved addition funding to support delivery.

9.3 Delays from steel column repairs and system connections led to facility closures and operator costs. Under the Leisure Contract, the Council has supported the Leisure Operator with a loss of income claim.

10. Legal Implications

10.1 Legal Officers have supported in formalising contracts with contractors and consultants in relation to the project.

11. Equalities implications

11..1 No direct equality implications

12. Health implications

12.1 The adopted Leisure Facilities Needs Assessment Strategy supports the Council's Corporate Plan in improving health and wellbeing by providing opportunities and facilities for residents to access and take part in physical activity at all levels across the Borough.

12..2 The provision of leisure facilities gives opportunities for residents to take part in physical activities and wider health and well-being opportunities,

13. Climate and environmental implications

13.1 The decarbonisation project at the Pingles Leisure Centre & Pingles Stadium will support climate sustainability measures and a further 20-year lifespan for the plant at the Pingles / Stadium facilities as well as the installation of PV Panels to generate electricity. These will all reduce the carbon footprint of the Pingles Leisure Centre and Pingles Stadium.

14. Section 17 Crime and Disorder Implications

14.1 The increase or provision of new facilities or different leisure pursuits will give opportunities for more residents to take part in physical activities.

15. Risk management implications

15.1 The project was managed by professional external consultants, providing specialist Technical Advisory to NBBC Officers.

15.2 The project is detailed within the corporate risk register for identifying and manging risk. Officers and the external project team have a weekly meeting to update on project progress and assess and manage any risks that arise.

15.3 By decarbonising the assets and fully modernise the crucial energy consuming plant will provide a more sustainable and energy efficient future for the sites for the next 20 plus years to come.

16. Human resources implications

16.1 External project management support has been procured to ensure the correct expertise and capacity is allocated to the project delivery.

17. Options considered and reason for their rejection

17.1 In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Report for noting	N/A

18. Appendices

None attached

19. Background papers

Cabinet 12th November 2025 – Pingles Decarbonisation Update – Agenda Item 7 – Minute Number CB57.

Delegated Officers Decision – signed on 13th October 2025 reference DO/51/2025 (TS).

Cabinet 18th June 2025 – Pingles Decarbonisation update – Agenda Item 10 – Minute Number CB14.

Cabinet 8th November 2023 – Agenda item 6 - Minute Number CB61.

20. Report Writer Details:

Officer Job Title: Assistant Director – Recreation and Culture

Officer Name: Katie Memetovic-Bye

Pingles gets a £4.2 Million Green Power-Up

There are over 50,000 visits to the pool and gym every month! Keeping that much water warm takes a lot of energy.

The Pingles Leisure Centre has just got a huge upgrade. But this isn't about new water slides — it's about saving the planet.

Mission Briefing

- **Project:** The Low Carbon Initiative
- **Investment:** Over £4 Million
- **Goal:** Turn a major energy user into a clean, green, future-proof machine!

The Pingles Blueprint Map

Super-Team
Delivered by Nuneaton & Bedworth Council, Sport England, Salix, and Asset+ (Johnson Controls).

The Power Catchers: 320kWp of Solar Panels.

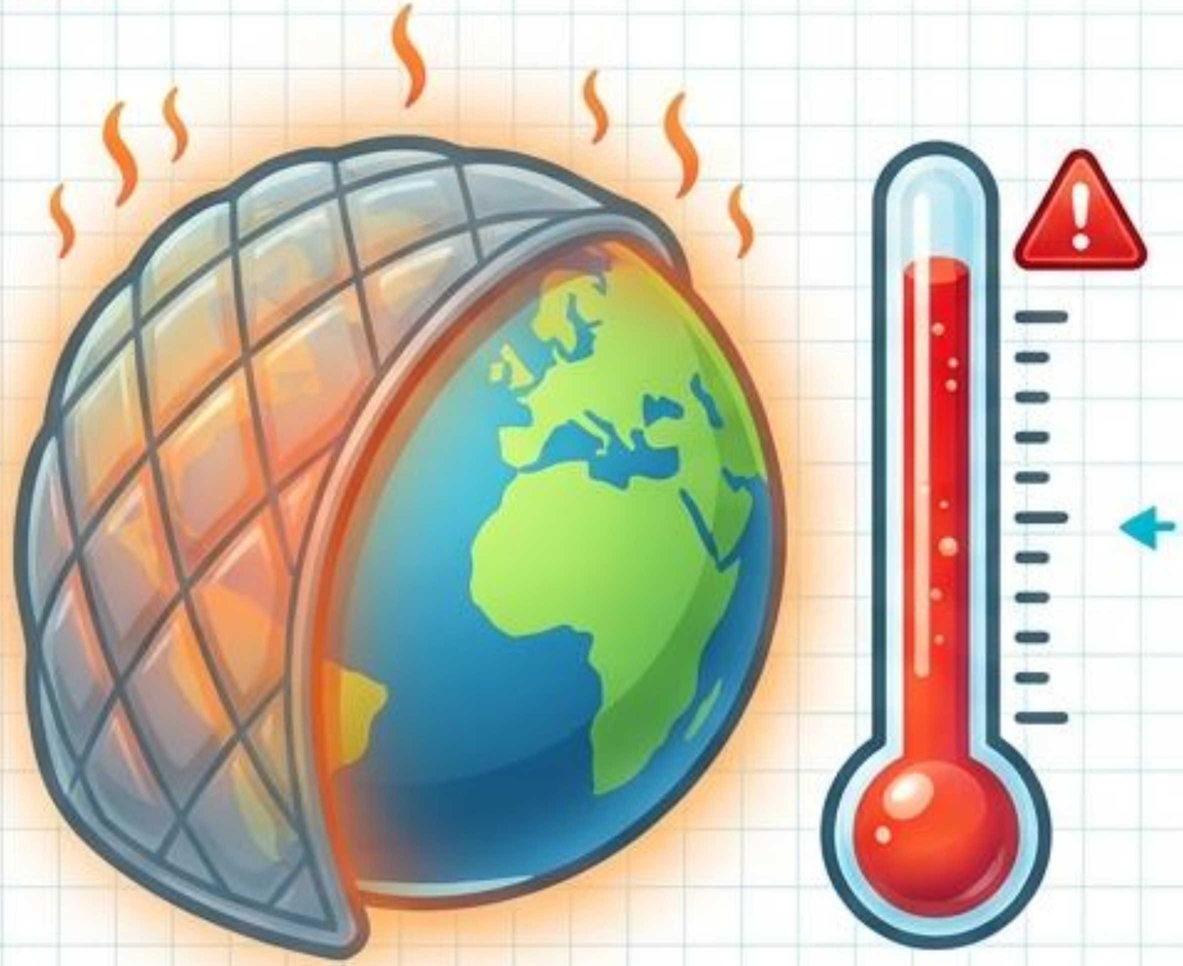
The Heat Engine: A brand new, acoustically fenced plant space holding 6 massive commercial Heat Pumps.

The Brain: Upgraded digital controls and cloud-connected switchboards.

Start: December 2024

Finish: May 2026

The Mission to Net Zero



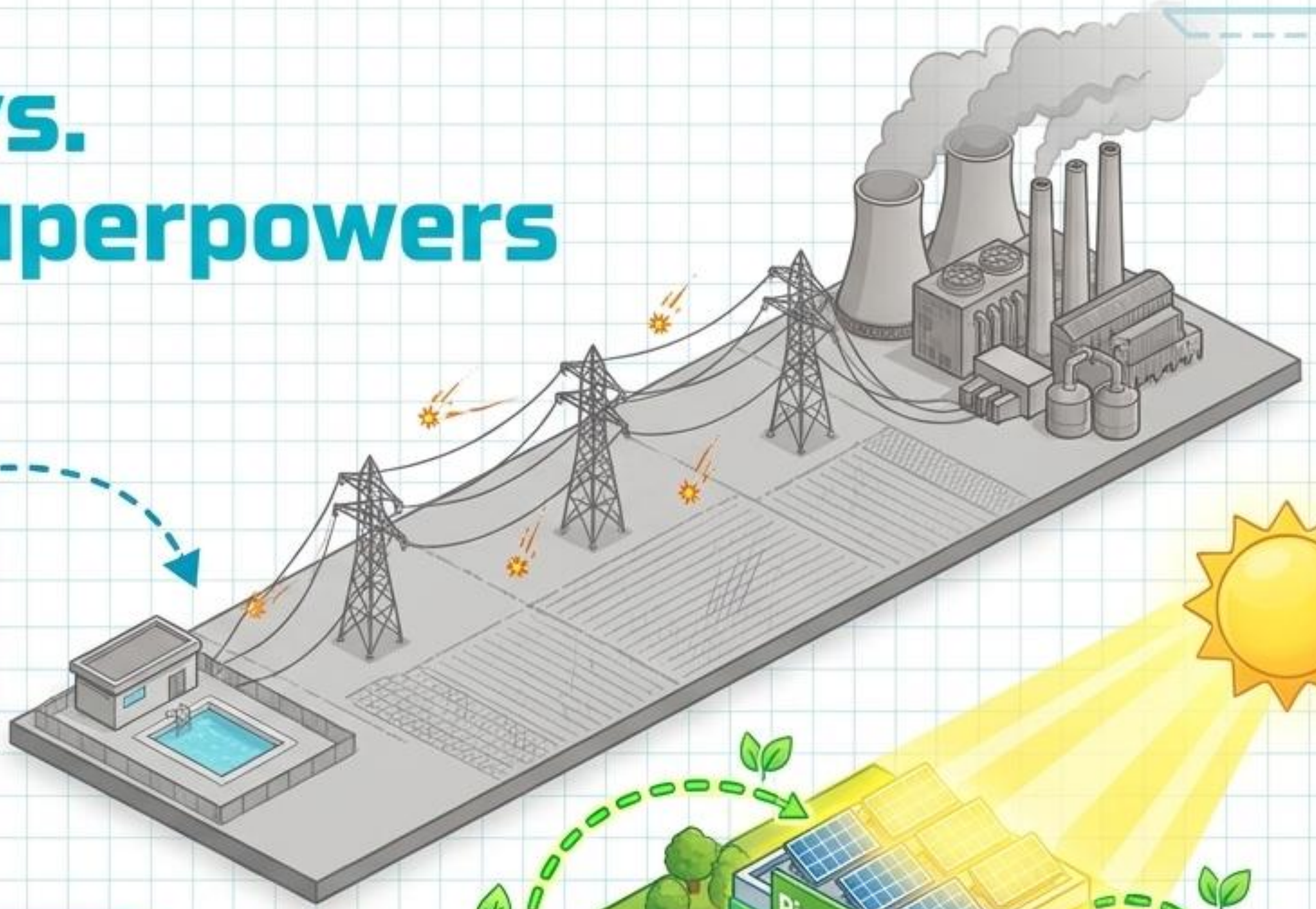
For decades, heating massive swimming pools meant burning gas (a fossil fuel). Burning gas releases carbon dioxide, which acts like a giant, invisible blanket wrapping around the Earth and trapping the sun's heat. This causes climate change.

The UK has a strict goal: Net Zero. This means we must stop adding extra layers to that invisible blanket. To do this, big public places like Pingles are leading the way by ditching fossil fuels for good!

Supermarkets vs. Home-Grown Superpowers

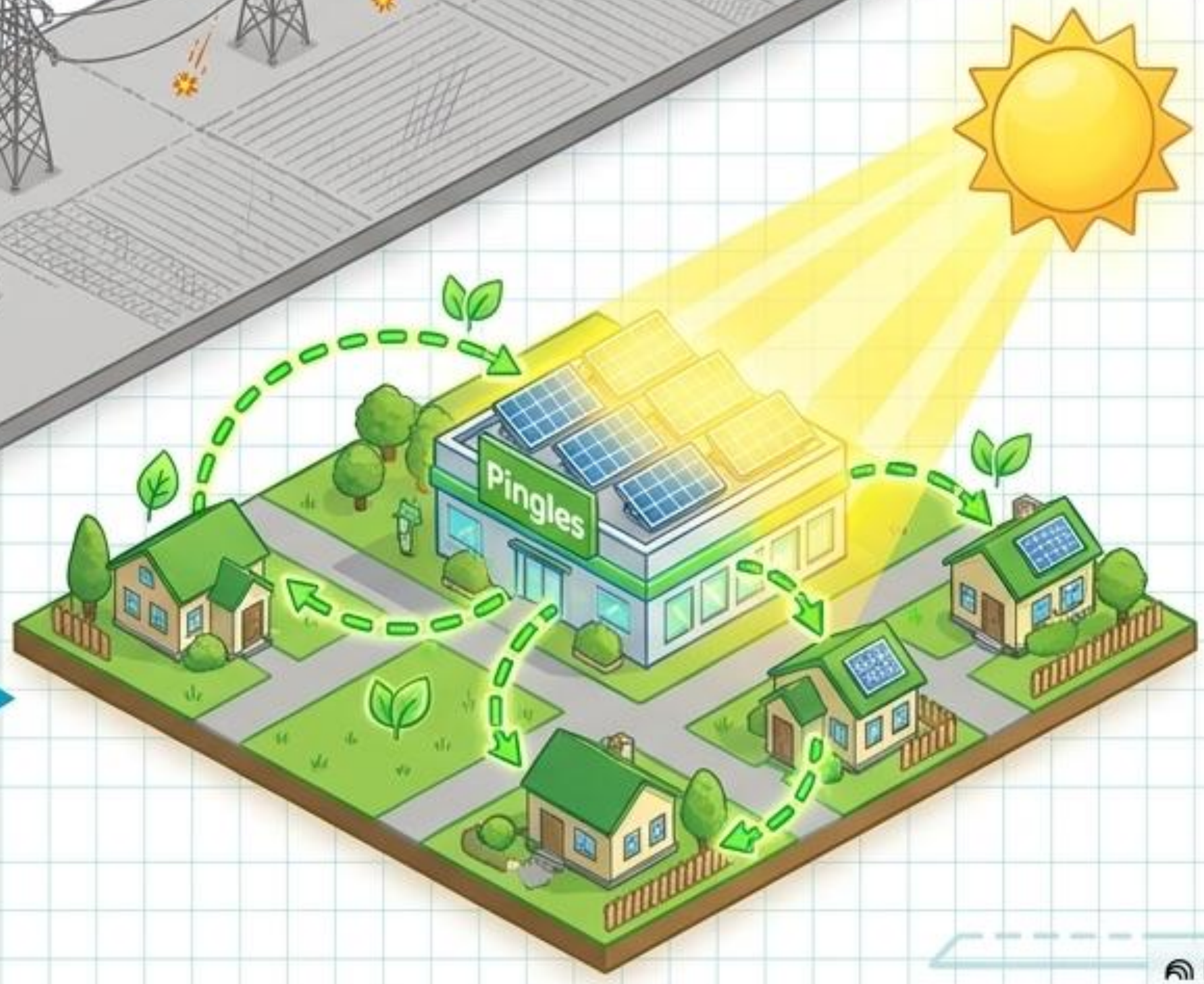
Centralised Grid

The Old Way (Centralised Grid):
Think of the old energy grid like a giant supermarket miles away. You have to travel far to get your energy, and a lot gets lost along the long wires before it even reaches the pool.



De-centralised Energy

The New Way (De-centralised Energy):
Pingles is becoming its own mini power station! It's like growing your own super-charged vegetables in your garden. You make the energy exactly where you need to use it. It's smarter, faster, and much better for the planet!



Tech Upgrade 1: Catching the Sun

The Tech: Solar Photovoltaic (PV) Panels.

A massive 320kWp array covering the north and south roofs, plus the trackside stadium roofs!

How it works:

These high-tech panels don't need a boiling hot summer day to work. They turn everyday daylight into pure electricity to run the centre's lights and pumps.

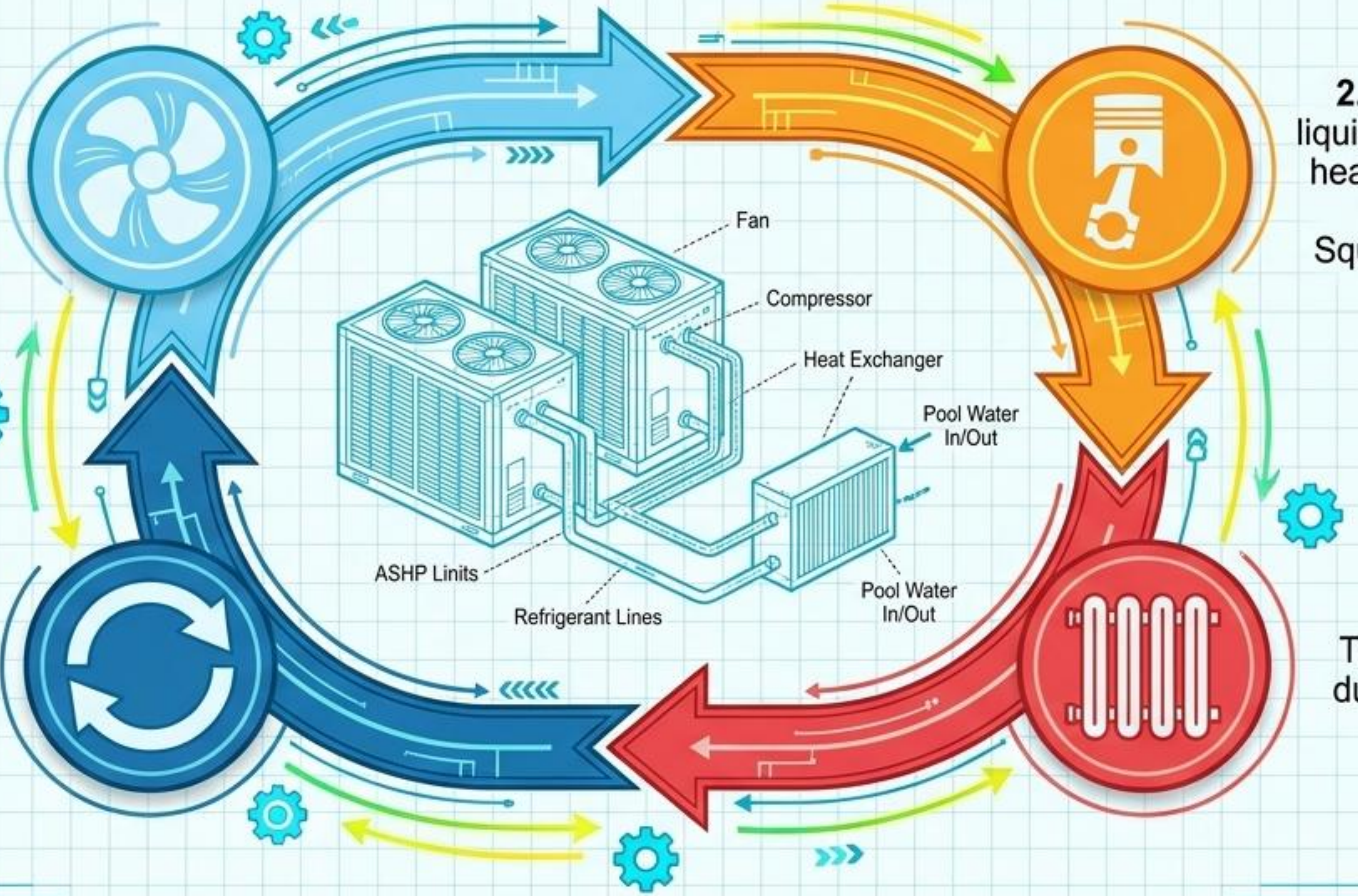
Geek Out! Fact Box:
The solar panels have a new Brain! A high-tech sub-meter tracks 25 different electrical circuits and uses a built-in mobile modem to send all the energy data straight to the cloud so engineers can monitor it from anywhere.

Tech Upgrade 2: The Magic Reverse Fridge

The Concept: A normal kitchen fridge takes warmth out of your food and pushes it out the back to keep things cold. An Air Source Heat Pump (ASHP) does the exact reverse! It takes warmth out of the outside air and pushes it into the swimming pool!

1. Catch: Giant fans pull in outside air. Believe it or not, even freezing 5°C winter air holds hidden heat energy!

2. Squish: A special liquid absorbs this hidden heat, and a compressor squishes it tight. Squishing gas makes it super hot!



3. Transfer: This intense heat is dumped directly into the pool water.

4. Repeat: The liquid cools down, loops back, and catches more heat.

The Ultimate Showdown: Gas Boilers vs. Green Tech

The Villain

Fuel Source: Fossil fuels dug deep from the earth.

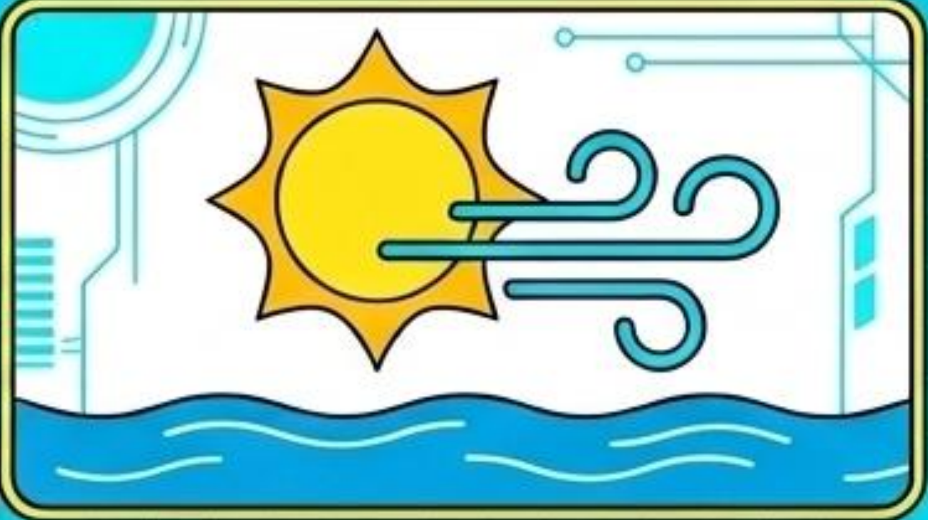
Carbon Footprint: Heavy polluter (Adds to the invisible blanket).

Efficiency: Burns fuel to make heat (loses energy in the process).

Status at Pingles: Switched off, removed and recycled!

VS

The Hero



Fuel Source: Free daylight and outside air!

Carbon Footprint: ZERO carbon emissions on site.

Efficiency: Moves existing heat around (Gives out more energy than it uses!).

Status at Pingles: Powering the future!

A Warmer Pool for a Cooler Planet

By **swapping old, dirty boilers for the power of the sun and the air,** Pingles is doing something amazing.

- **Protecting the environment** by cutting local carbon emissions.
- **Saving money** on energy so the pool can stay open for years to come.
- **Making Nuneaton a greener, cleaner, and greater place to live.**

AGENDA ITEM NO.7

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Cabinet

Date of Meeting: 9th September 2026

Subject: Culture Update

Portfolio: Leisure and Health

Responsible Officer: Assistant Director – Recreation and Culture

Corporate Plan – Theme: Your Council

Corporate Plan – Aim: Focus on Civic Pride, celebrating rich heritage and diverse communities

Ward Relevance: All Wards

Public or Private: Public

Forward Plan: Yes

Subject to Call-in: Yes

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1. Purpose of report

1.1 To provide Cabinet with an update on actions being delivered following the adoption of the Culture Strategy and to update ref project delivery.

2. Recommendations

2.1 That Cabinet note the Cultural update.

3. Background

3.1 Officers have continued to make successful steps to deliver recommendations within the Borough's adopted Culture strategy:

Aim	Action	Who	When
Involve local artists and local	Continue developments with Imagineer on how	NBBC, Imagineer,	2023 and ongoing

people in working with professional artists to **raise ambition** and **develop skills.**	they can support ambitious projects and skills development in the area, but also seek other professional companies to begin working in the area.	other professional organisations	
Outreach: Bringing cultural activity to where people are: villages, outdoor spaces and parks, schools and community venues. programme could also aim to bring cultural engagement to villages and areas with limited cultural offer. The	Look to local partners to develop outreach arts programmes, e.g. Support the promotion of the Libraries' cultural activity; look at opportunities for arts activity to support health and wellbeing; and discuss with Live & Local and other partners how they can bring more performances to communities; Plan for more outdoor arts activity on accessible green spaces around the Borough.	Warwickshire Libraries; Warwickshire Arts Service; Live & Local; other programmes. Cultural Forum and Voluntary Sector Parks, NBBC, Festivals, Street Arts, Reel People	2023 and ongoing
Develop skills and celebrate the talent of **children and young people.** Seek ways in which cultural opportunities in the Borough can integrate with programmes for young people and support their development,	Develop a structure to link local schools and local arts organisations and festivals in order to develop joint working and develop opportunities for young people to integrate into wider Borough activities.	Local schools and colleges, Warwickshire Education, local festivals, local youth provision	2024 ongoing
Festivals, large scale community celebrations: celebrating the borough, showcasing talent, shared identity,	Connect local arts festivals and NBBC Events teams, perhaps through the Cultural Forum, to create a coordinated approach to delivering an annual programme of festivals and events, thus sharing	Cultural Forum, local festivals, arts and heritage groups	2024 ongoing

celebrating diversity, revitalising town centres.	marketing and promotion and audiences, and potentially working together to access funding to enable more ambitious events.		

3.2 An application to the Arts Council Major Projects Fund was made in December 2025. The bid was successful and a sum of £750,000 has been awarded to support Phase 1 of a major touring project.

3.3 This would include the building of a large-scale mechanical model of a much-loved fictional character in 2026, which would then be toured around the rest of the Country in 2027/2028. The application will seek support of a large-scale funding application.

3.4 This project will provide an opportunity to utilise the skills of the area alongside community engagement. In doing so it will deliver on the Cultural Strategy in the following areas

- Bringing cultural activity to where people are
- Involving local artists and local people in working with professional artists to raise ambition and develop skills
- Developing skills and celebrate the talent of children and young people**.**

3.4 At Cabinet in April 2026 delegated authority was given to Officers to enter a contract with Artichoke Trust to deliver the programme.

3.5 The Cultural Strategy commissioned by Nuneaton and Bedworth Borough Council identified the creation of a Cultural Compact as a way forward for the Arts in the borough. Nuneaton and Bedworth is an area of low engagement and a priority area of Arts Council England (ACE) and the Council where successful in funding by ACE to form a Cultural Compact.

4. <u>Body of report and reason for recommendations</u>

4.1 Arts Council Major Projects Fund – programme update

4.1.1 The Council have formally entered into an agreement with Artichoke to deliver the Programme.

4.1.2 Initial site visits have been conduction across the Borough throughout June looking at a potential route/series of sites for the live event.

4.1.3 Meetings are currently being planned with group leaders to discuss their involvement, and a series of sessions are being planned where ideas can be workshopped with participants in order to:

- Enable participants to input their creative ideas for the event
- Solidify the programme for the live event

- Create a template/methodology of working to engage participants and a model for rehearsals for other host partners

This programme of workshops will take place during August and September

4.1.4 The Research & Design programme for schools ran from 1st June and until the 17th July. Each school took part in up to five sessions within this period (approximately twenty sessions in total). The schools that participated include:

- The Canons CE Primary
- Race Leys Junior School
- ALP Nuneaton
- Park Lane Primary School

4.2 Cultural Compact update

4.2.1 The establishment of a Cultural Compact in Nuneaton and Bedworth directly aligns with the core recommendations of the UK Cultural Cities Enquiry (CCE), which calls for place-based partnerships that acts as an influential cross-sectoral group to take full advantage of a place's cultural resources, embed culture into local and regional planning, and develop new innovative investment models for culture and creativity in place.

4.2.2 The aim is to establish a Cultural Compact for Nuneaton and Bedworth: a cross-sector, place-based independent partnership to define a shared cultural ambition for the borough.

4.2.3 The Compact will deliver the following outcomes: To co-create and co-deliver a holistic vision for culture in Nuneaton and Bedworth linked to the newly adopted Nuneaton and Bedworth Cultural Strategy and the Cultural Cities Enquiry Recommendations.

4.2.4 The resulting cultural compact whilst having local authority involvement will evolve to become an independent strategic lead for culture in the borough not being led by the Council.

4.2.5 The project has been funded through a £19,420 grant by Arts Council England to undertake this development project and £10k match funding by the Council as well as in-kind support from Warwickshire County Council.

4.2.6 The development of a Cultural Compact and the following activity has commenced and is to be undertaken between February 2026 - January 2027.

- Recruit a freelance project lead and freelance administrative support
- Convene the relevant cross sector partners and establish membership
- Research possible governance structures: including contact/visit with established Cultural Compacts, working with Compact members and engaging with stakeholders across sectors to explore shared ambitions

- Recruit and appoint a Chair for the Compact
- Develop shared vision, strategy and action plan
- Establish branding and communication tools
- Research Funding opportunities for the Compact and the implementation of the action plan.

5. Consultation with the Public, Members, Officers and Associated Stakeholders

5.1 Consultation has been undertaken with the Portfolio Holder and Strategic Directors and Assistant Directors in relation to items detailed within the report.

6. Financial Implications

6.1 The large-scale cultural event is budgeted to be a £1.8m programme over three years, with a significant amount of the funding subject to a successful ACE application. However, NBBC is only committing itself to Phase 1 the development stage of the project. The financial input for Phase1 is £750,000 which is being funded by the Arts Council Grant.

6.2 The remaining funding will be sort via external cultural partners. A sum of £10k from the grant has been allocated to offset the costs to the local authority in delivering the bid

6.3 The Cultural Compact has been funded through a £19,420 grant by Arts Council England and £10k match funding by the Council.

7. Legal Implications

7.1 Consultation will be undertaken with Legal when entering contractual arrangements with arts providers.

8. Equalities implications

8.1 The opportunity of a large-scale event would help to deliver access, and opportunities within Culture for all members of the Borough including for protected groups.

8.2 A established cultural compact within the Borough will continue to build and grow Cultural opportunities within the Borough including targeting protected groups.

9. Health implications

9.1 The delivery of a range of arts / cultural events / festivals to bring communities together which will help provide health and well-being outcomes.

10. Climate and environmental implications

10.1 Consideration would be given to climate and environmental implications through the planning and design process of any event.

11. Section 17 Crime and Disorder Implications

11.1 Improved focus on Culture across the Borough will provide opportunities and access to cultural services or activities which could reduce anti-social behaviour in individuals.

12. Risk management implications

12.1 Consideration needs to be made in relation to the commitments to be made by the Council and risks associated with applying for large scale funding considering the capacity and resources within the team and any financial commitments required.

13. Human resources implications

13.1 Officer capacity will be required to deliver all elements detailed within the report.

14. Options considered and reason for their rejection

14.1 In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Report for noting	N/A

15. Appendices

None attached

16. Background papers

Culture Update – Cabinet – 22nd April 2026 – Agenda Item 10 – Minute Number CB125
Culture Strategy - Cabinet 6 September 2023 - Agenda Item 9 - Minute number CB42

17. Report Writer Details:

Officer Job Title: Assistant Director – Recreation and Culture

Officer Name: Katie Memetovic-Bye

AGENDA ITEM NO. 8

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	9th September 2026
Subject:	Housing Allocation Policy Amendments
Portfolio:	Housing
Responsible Officer:	Assistant Director Housing Services
Corporate Plan – Theme:	Housing, Health and Communities
Corporate Plan – Aim:	Supporting Vulnerable Residents
Ward Relevance:	All
Public or Private:	Public
Amendment to Budget:	No Council Tax Related: No

Recommendation to Council/Cabinet/Committee: No

Forward Plan:	Yes
Subject to Call-in:	Yes

1. Purpose of report

1.1 This report seeks approval of proposed amendments to the Council's Housing Allocations Policy, as detailed in Appendix B. The amendments are intended to ensure continued compliance with housing legislation, statutory guidance and best practice, whilst improving clarity, consistency and transparency in the operation of the Housing Register. The report also seeks approval to undertake consultation and, following consideration of consultation responses, implement the revised policy.

2. Recommendations

2.1 To approve the proposed amendments to the Housing Allocations Policy as detailed within Appendix B.

2.2 To approve consultation on the proposed amendments with key stakeholders, including the Homeless Partnership Forum and Tenant Panel, and to consider any feedback received prior to implementation of the revised policy.

2.3 Subject to the outcome of the consultation, delegated authority be given to the Assistant Director Housing Services, in consultation with the Portfolio Holder for Housing, to make any minor amendments arising from consultation, legislative updates, operational requirements, or legal advice prior to implementation of the revised policy.

2.4. Subject to 2.3, approval be given to adopt and implement the revised Housing Allocations Policy following completion of the consultation process and consideration of any feedback received.

2.5 Subject to 2.3, if major amendments are required, it be noted that a future report be issued back to Cabinet or considered via an Individual Cabinet Member Decision subject to the criteria in the Constitution, to seek approval to adopt the revised policy.

3. Background

3.1 The Council is required under Part 6 of the Housing Act 1996 to maintain and publish an Allocations Policy setting out how social housing is allocated and how applicants are prioritised for housing assistance.

3.2 A review of the current Housing Allocations Policy has been undertaken to ensure that it remains compliant with current legislation, statutory guidance and emerging best practice and reflects the Council's operational experience and current housing pressures.

3.3 The review identified several areas where additional clarity and strengthened wording would improve transparency, consistency of decision-making and understanding for applicants and stakeholders.

4. <u>Body of report and reason for recommendations</u>

4.1 The proposed amendments strengthen key sections of the Housing Allocations Policy by providing greater clarity around eligibility, qualification criteria, local connection requirements and the management of applications involving unacceptable behaviour. The amendments also ensure stronger alignment with current statutory provisions and guidance.

4.2 The principal changes include:

- Introduction of updated statutory eligibility wording in line with Section 160ZA of the Housing Act 1996.
- Revision of the local connection requirement to a continuous two-year residency period immediately preceding the application.
- Inclusion of statutory exemptions to the local connection requirement.
- Extension of potential disqualification periods for unacceptable behaviour to up to 12 months.
- Introduction of clearer proportionality and mitigating circumstance considerations.
- Inclusion of specific references to serious sexual offences and sexual offence prevention orders.
- Clarification regarding the consideration of relevant criminal convictions.
- Definition of persistent noise nuisance based upon evidential thresholds.
- Clarification that failure to qualify for the Housing Register does not remove the Council's statutory homelessness duties.
- Clarification of Armed Forces provisions.
- Strengthening governance arrangements for Local Lettings Policies and direct allocations.
- Introduction of a formal definition of vulnerable applicants.

4.3 The amendments support fair and proportionate decision-making by requiring officers to consider individual circumstances, safeguarding issues, mitigating factors and evidence of changed behaviour before determining whether an applicant should be excluded from the Housing Register.

4.4 The revised policy strengthens arrangements for supporting vulnerable applicants and provides a clearer framework for direct allocations outside the Choice Based Lettings process where there are significant safeguarding, welfare, medical or homelessness considerations.

4.5 Approval of the recommendations will result in an updated policy framework that is legally compliant, transparent, robust and capable of supporting consistent allocation decisions across the Housing Service while reducing the risk of challenge arising from unclear policy wording.

5. Consultation with the public, members, officers and associated stakeholders

5.1 The proposed amendments to the Housing Allocations Policy have been consulted upon with the Homeless Housing Forum, key partner agencies and the Tenant Panel. A Quality Impact Assessment has been completed and all comments received through the consultation process have been considered in the development of the final proposed amendments.

6. Financial Implications

6.1 There are no direct financial implications arising from the proposed amendments.

7. Legal Implications

7.1 The proposed amendments support compliance with the Housing Act 1996 (as amended), the Homelessness Reduction Act 2017 and relevant statutory guidance relating to housing allocations and homelessness duties. The revisions strengthen the legal robustness of the Council's allocations framework.

8. Equalities implications

8.1 No specific equality implications have been identified following the completion of an equality impact assessment.

9. Health implications

9.1 No specific health implications have been identified following the completion of an impact assessment.

10. Climate and environmental implications

10.1 No direct climate and/or environmental implications have been identified.

11. Section 17 Crime and Disorder Implications

11.1 No direct Section 17 crime and disorder implications have been identified.

12. Risk management implications

12.1 No direct risk management implications have been identified.

13. Human resources implications

13.1 No direct human resource implications have been identified.

14. Biodiversity Implications

14.1 No direct biodiversity implications have been identified.

15. Local Government Reorganisation (LGR) Implications

15.1 No direct LGR implications have been identified.

16. Options considered and reason for their rejection

16.1 In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Retain existing policy without amendment	Rejected because sections of the policy would remain unclear and may not adequately reflect current legislation, guidance and operational requirements.
B	Undertake a full policy rewrite	Rejected because the current policy framework remains fit for purpose. Targeted amendments achieve the desired outcomes more proportionately and efficiently.

17. Conclusion

17.1 The proposed amendments will strengthen the Housing Allocations Policy by improving legal compliance, governance, transparency and consistency in decision-making. The changes provide clearer guidance for applicants, officers and stakeholders whilst ensuring that the Council continues to meet its statutory housing and homelessness responsibilities. Approval of the recommendations will enable consultation to be completed and an updated policy to be implemented.

18. Appendices

18.1 Please note the following appendices:

i. Appendix A – Existing Housing Allocations Policy
ii. Appendix B – Housing Allocations Policy Proposed Amendments
iii. Appendix C – Equality Impact Assessment

19. Background papers

19.1 Please note there are no background papers.

20. Report Writer Details:

Officer Job Title: Sharon Clinton

Officer Name: Assistant Director – Housing Services

Housing Allocation Policy Nuneaton & Bedworth Borough Council (March 2026)

Housing Allocations Policy
Nuneaton and Bedworth
Borough Council
03/03/2026

https://www.nuneatonandbedworth.gov.uk/translate

To view this document in your preferred language, please use the above page to translate

Arabic: لعرض هذا المستند بلغتك المفضلة، يرجى استخدام صفحة الويب أعلاه للترجمة.

Chinese: 要以您的首选语言查看本文档,请使用上面的网页进行翻译.

Dari: برای مشاهده این سند به زبان مورد نظر خود، لطفاً از صفحه وب بالا برای ترجمه استفاده کنید.

Greek: Για να δείτε αυτό το έγγραφο στη γλώσσα που προτιμάτε, χρησιμοποιήστε την παραπάνω ιστοσελίδα για να μεταφράσετε.

Gujarati: આ દસ્તાવેજને તમારી પસંદીદા ભાષામાં જોવા માટે, કૃપા કરીને ભાષાંતર કરવા માટે ઉપરના વેબપેજનો ઉપયોગ કરો.

Hindi: इस दस्तावेज़ को अपनी पसंदीदा भाषा में देखने के लिए, कृपया अनुवाद करने के लिए ऊपर दिए गए वेबपेज का उपयोग करें।

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Polish: Aby wyświetlić ten dokument w preferowanym języku, skorzystaj z powyższej strony internetowej w celu przetłumaczenia.

Punjabi: ਇਸ ਦਸਤਾਵੇਜ਼ ਨੂੰ ਆਪਣੀ ਪਸੰਦੀਦਾ ਭਾਸ਼ਾ ਵਿੱਚ ਦੇਖਣ ਲਈ, ਕਿਰਪਾ ਕਰਕੇ ਅਨੁਵਾਦ ਕਰਨ ਲਈ ਉੱਪਰ ਦਿੱਤੇ ਵੈੱਬਪੇਜ ਦੀ ਵਰਤੋਂ ਕਰੋ।

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Slovak: Ak si chcete pozrieť tento dokument vo vami preferovanom jazyku, použite na preklad vyššie uvedenú webovú stránku.

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Urdu: اپنی پسندیدہ زبان میں اس دستاویز کو دیکھنے کے لئے، براہ کرم ترجمہ کرنے کے لئے مندرجہ بالا ویب پیج کا استعمال کریں.

Vietnamese: Để xem tài liệu này bằng ngôn ngữ ưa thích của bạn, vui lòng sử dụng trang web ở trên để dịch.

United to Achieve

Section One - Housing Allocation Policy

1. Key Aims and Objectives

1.1 <u>Key Aim</u>

Nuneaton and Bedworth Borough Council (hereafter referred to as NBBC) Housing Allocation Policy aims to ensure that all social housing within the Borough is allocated fairly and objectively, to those in greatest housing need, having regard to any legislative requirements and Codes of Guidance issued by both the Ministry of Housing Communities and Local Government and the regulator for social housing providers.

1.2 <u>Key Objectives</u>

This policy has been developed with a view to meeting the following principles and key objectives:

- To operate a Choice Based Lettings Scheme that offers realistic informed choice for all
- To improve and encourage a balanced and sustainable community
- To ensure that every application is dealt with fairly and consistently irrespective of race, disability, gender, age, sexual orientation, gender reassignment, religion and/or belief, pregnancy/maternity or marriage status
- To operate a Choice Based Lettings Scheme that is simple, easy to understand, transparent, open and fair
- To give appropriate priority to applicants who fall within the ‘Reasonable Preference’ and ‘Additional’ categories as set out in Part 6 of the Housing Act 1996
- To empower applicants by giving them more opportunity to express choice and preferences about where they want to live, whilst taking into consideration both the availability of housing resources and the high demand for housing
- To assist those applicants who are vulnerable in accessing the lettings scheme, to identify and support vulnerable people to access our housing application process through to securing permanent accommodation.
- To provide appropriate advice and assistance to all.
- To provide information in other formats such as Warwickshire Housing Options Guide - easy read
- To work in partnership with support agencies
- To translate key documents when requested
- To ensure appropriate support is available for customers using the System.

2. Service Standards

2.1 <u>Service Standards to our customer</u>

As part of our commitment to our customers, NBBC will:

- Treat applicants with courtesy and respect
- Listen – all housed tenants within NBBC stock and Registered Provider stock will be invited to complete a satisfaction survey when they have moved into their new home which will be used to improve the services we provide.
- Be helpful and polite
- Try to deal with applicants at first point of contact

- Make things as easy as possible, the policy has been produced in consultation with partner agencies, customers and Register Providers
- Deal with any complaint in line with our complaint's procedure

The Council wholeheartedly endorse the Tenancy Standard set by the Housing Regulator. This requires social landlords to let their homes "in a fair, transparent and efficient way" and that they shall consider the housing needs and aspirations of tenants and potential tenants and be able to demonstrate how their lettings make the best use of available housing.

There must be a clear application, decision making and appeals process in place. Registered providers are expected to co-operate with local authorities strategic housing function and their duties to meet local housing needs. This includes assistance with local authorities' homelessness duties and through meeting obligations in nomination agreements.

2.2 Advice and Support for Customers

If you do not have access to the internet or you do not have a postal address, we can support you to register and if you are not able to express an interest on the properties we advertise, we can support you. If you need support the Choice Based Letting team and the Customer Services team will be able to help you register and search for properties and express your interest.

You may not be eligible to join the Housing Register, or you may wish to consider all other housing options to resolve your housing circumstances. Our Homelessness Prevention Team focus on early intervention initiatives to try and resolve housing issues and give advice on options available may be able to help you. In addition, you may find the Enhanced Housing Options Wizard useful, and that has the facility to produce a document with the housing options available tailored to you; to use this, you must register onto NBBC Homes and follow the steps to view your options. NBBC along with our neighbouring authorities provide an easy read Housing Options booklet that can be found on our website by searching for Warwickshire Housing Options Guide – easy read.

Some vulnerable people will need additional support throughout their housing allocation journey to ensure they have the same opportunities to secure a home of their own. The support we provide will be agreed with the applicant and personalised to their specific needs.

3. Equality

3.1 Policies and Practices

NBBC will ensure its policies and practices are non-discriminatory and will promote equality by preventing and eliminating discrimination on the grounds of race, disability, gender, age, sexual orientation, gender reassignment, religion and/or belief, pregnancy/maternity or marriage status. The scheme will be accessible, responsive and sensitive to the diverse needs of individuals. NBBC's aim is to create an environment where equality is at the heart of everything we do.

The impact of this policy will be monitored, to ensure that it promotes equality to everyone. To achieve this, all applicants will be asked to provide details of their circumstances and any personal information when they apply to join the register.

3.2 Equal Opportunity to apply and receive offers of accommodation.

NBBC will ensure all potential applicants have equality of information about the service and equal opportunity to apply, express an interest in and receive offers of accommodation. To ensure that vulnerable groups are not disadvantaged by the Choice Based Lettings Scheme NBBC will:

- provide practical assistance to those who may have difficulty in understanding the requirements of the system
- provide practical assistance in the applicants preferred way, where the applicant may have difficulty completing an application
- provide tailored assistance to those who may have difficulty expressing an interest in properties, including expressing an interest on their behalf, if that is necessary
- monitor the profile of those who are applying and expressing an interest in properties, to ensure that minority and hard to reach groups are actively engaged in the service

4. Applications from Elected Members and Employees

4.1 Elected Member and Employee disclosure

Applications to the Housing Register can be accepted from employees, elected members and their close relatives, provided they are eligible to apply and subject to the rules in Schedule 1 of Housing Act 1996. Applicants must disclose any such relationship at the time of registration.

5. Deliberately withholding information or providing false information

5.1 Withholding details fraudulently

Fraudulent behaviour is not acceptable to the Council and appropriate action will be taken. It is a criminal offence (punishable by a fine of up to £5,000) if an applicant gives false information or withholds information related to their housing application.

If a tenancy was obtained by giving false information possession proceedings can be instigated.

Section Two - Eligibility and Qualification

1. Introduction

1.1 What is the Housing Register

The Housing Register is a single list of all the people (hereafter referred to as applicants) who have applied to register or been accepted onto the Housing Register. It includes both new applicants and existing social housing tenants wishing to transfer.

Housing Authorities are given the power to determine who is, or is not, eligible to apply to their Housing Register and Social Housing may only be allocated to ‘qualifying persons’.

1.2 Who can join the Register

To be eligible to join the Housing Register, applicants must be aged 16 or over; and meet the qualifying criteria.

Joint applications will be accepted, provided both applicants are eligible and intend to occupy the property together as their only or main home.

2 Eligibility to join the Register

2.1 Are you eligible to join the Register

When assessing applications to join the register we will ascertain whether an applicant is eligible to register or, if the household qualifies for an allocation.

The assessment will be in accordance with the regulations and guidance from The Ministry of Housing, Communities and Local Government issued to local housing authorities (‘housing authorities’) in England under s.169 of the Housing Act 1996 (‘the 1996 Act’).

This explains that certain applicants cannot be placed on the housing register because they are ineligible due to immigration status as detailed in Section 160A of the Housing Act 1996. At the application stage verification checks will be made to confirm the eligibility status of all applicants. If you are not sure if this section applies to you, please contact the Choice Based Lettings Team. If you are subject to this and we have no duty to offer you a home our Homelessness Prevention Team can offer you advice on your other housing options.

3 Qualification Criteria

3.1 Do you qualify to join the Register

The qualifying criteria for applicants who can join the housing register are those who:

- are age 16 or over
- have a local connection to Nuneaton and/ or Bedworth
- have no current housing related debt, or previous housing related debt, owed to a social or private landlord
- have not caused unacceptable or anti-social behaviour

- are not a homeowner

See below for the details:

3.1.1. Age 16 or over

Applicants aged 16 or 17 can join the Housing Register but will not be made an allocation, or be able to bid for properties, until they reach the age of 18. Unless they have been accepted as statutorily homeless or are a subject of a Special Agency Referral.

In these cases, applicants must provide details of a guarantor. A guarantor is a responsible person, such as a parent or other close family member, or a representative from a support agency, such as Childrens Services.

3.1.2 Local Connection

To qualify to join the housing register, applicants must meet at least one or more of the following criteria. Applicants must:

- have lived within the Borough for at least 6 out of the last 12 months, or 3 out of the last 5 years
- have immediate family in the Borough with the family members concerned currently living in the Borough and have done for at least 5 years or more. This would normally be parents, adult children, brothers or sisters provided there are sufficiently close links in the form of frequent contact, commitment or dependence. Other family associations such as grandparents and adoptive parents would also be considered if sufficiently close links are evidenced
- work permanently in the Borough
- give to, or receive support from, a close family member who is resident in the Borough. Applicants will need to supply supporting evidence from a medical professional or social worker together with full details of the support that is being given/received

Independent Living Stock

The local connection criteria will not apply to certain properties within the Independent Living Stock where the property has not been occupied for a 6-month period and this will be shown on the property advert.

3.1.3 Exclusion Due to Unacceptable Behaviour

When deciding whether an applicant is eligible for housing, NBBC will consider the behaviour of not only the applicant but also that of the other members of their household. NBBC may decide that an applicant and/or any member of the applicant's household be treated as ineligible for housing and exclude them from the Housing Register on grounds of their behaviour. This applies to existing tenants applying to transfer and to new applicants joining the register as well as those who register a change of circumstance.

Behaviour that may be regarded by NBBC as unacceptable includes:

- Physical assaults (such as domestic and racial violence). Perpetrators of domestic abuse who are subject to a non-molestation order, an injunction order, an occupation order or a restraining order
- Convicted of using a property for immoral or illegal purposes

- Committed an act of fraud, withheld falsified or misrepresented any information pertaining to access to public funding and/or services
- Owing a housing related debt to a Council, Housing Association or Private Landlord
- Perpetrators of abuse causing damage or threats to kill
- Noise nuisance continuing for long periods of time
- Current or former tenants who are, or have been, in serious breach of their tenancy conditions due to anti-social behaviour or are subject to a court order
- Anyone with a history of serious anti-social behaviour and/or criminal behaviour such as intimidation, drug dealing or discrimination/harassment (due to any of the protected characteristics in the equality section). Where an applicant has a history of anti-social behaviour or has breached their tenancy conditions or has a housing related debt, all relevant facts will be considered before a decision is made
- Anyone who has caused damage to a Council/Housing Association or private rented property. This includes the tenant, a member of tenant's household or visitors to the property
- Anyone who has been violent to or threatened staff of NBBC
- Applicants who deliberately worsen their housing circumstances in order to improve their housing priority. For example, if a household in privately rented accommodation, with no overcrowding issues were to give up that tenancy to move in with relatives where they are overcrowded, this action would be seen as intentionally making their circumstances worse
- Their behaviour will be such that it either reflects the applicant's unsuitability to become a tenant or that a current tenancy is not being conducted in a satisfactory manner. The behaviour may include a breach of tenancy obligations
- Independent Living Accommodation – Their behaviour reflects the applicants' unsuitability to be housed as this could have an impact on other applicants who have high, medium or low, welfare, medical or hardship needs.

In determining whether an applicant does not qualify due to unacceptable behaviour, the Council will consider:

- Has the applicant or a member of the applicant's household been guilty of unacceptable behaviour?
- Was the unacceptable behaviour serious enough to deem the applicant or a member of their household unsuitable to be a tenant?
- At the time of the application or allocation, is the applicant still unsuitable to be a tenant by reason of that behaviour, or the behaviour of a member of their household?

Actions which are considered to make an applicant unsuitable to be a tenant will lead to the applicant being excluded from the housing register for a 6-month period. This is deemed as sufficient time for the applicant to provide evidence that their behaviour has shown consistent improvement. Applicants will need to evidence that they have been living independently with improved behaviour for the 6-month period.

Applicants will be required to re-apply after 6 months following exclusion.

In some circumstances applicants who have relevant spent/unspent convictions for serious criminal offences which caused issues with their previous accommodation and neighbourhood, may be ineligible for an allocation following thorough investigation.

Investigations will be carried out by Choice Based Lettings Officers and will give applicants the right to appeal the decision made, which will then be investigated by an independent officer not previously involved with the decision.

3.1.4 Homeowners

Homeowners will not be eligible unless they have exceptional circumstances. This could be because of significant financial hardship or serious medical circumstances.

This criteria does not apply to applicants who wish to be considered for Independent Living properties this is to allow applicants with medical and welfare needs to access the Independent Living support services

Income and Savings

Applicants with sufficient income levels of assets or savings that would enable them to access market housing within the Borough will not be eligible.

An applicant will not qualify for the Housing Register if the household's gross income is more than, £45,000 (gross income before deductions for tax, national insurance, etc.) per year for a couple or single person with children or £25,000, (gross income before deductions for tax, national insurance, etc) per year for a single person without children, or having savings (including shares, investments, etc) of more than £16,000.

This criteria does not apply to applicants who wish to be considered for Independent Living properties this is to allow applicants with medical and welfare needs to access the Independent Living support services.

3.1.5 Housing Related debt

Applicants and current/former tenants who owe a housing related debt to a Council, Housing Association or Private Landlord will not be eligible. Registered applicants will be asked to confirm on the allocation of a property that they do not owe a debt. If a debt is owed their application will be deemed not eligible, at this stage, offers to clear the debt to gain the offer of accommodation will not be considered.

This could include current or former rent arrears, current or former court costs, temporary accommodation or other debts such as clearance, damage or repayment of rent deposit where the Council is not satisfied about the reasons why the arrears have occurred.

Applicants who consider the debt to be through no fault of their own will need to provide information about the reasons for the debt and the action taken by them to resolve the issue. The Council will consider the facts, including documentary information before determining these applicant's eligibility. The onus will be on the applicants who wish to join the register to provide details and for those registered to inform the Council of any change of circumstances.

4 No Housing Need

4.1 Identifying a housing need

Households who are assessed as being in 'no identified housing need' will be unable to join the NBBC Housing Register. These applicants will be given further information and assistance and will be advised to approach NBBC's Homelessness Prevention Team - prevention@nuneatonandbedworth.gov.uk

All applicants who have been identified as having no housing need will receive an email notification of the decision. If the applicant disagrees with the decision the NBBC website will advise them how to request a review of that decision.

5 Transferring Tenants

5.1 Existing social housing tenants who wish to move

Existing social housing tenants can apply to move and will have their priority assessed in the same way as other housing register applicants.

Any tenant whose property has not been kept to a standard deemed acceptable by NBBC, for example poor decorative standard and internal damage to fixtures and fittings that are not classed as normal wear and tear, will not be offered accommodation. These applicants will be unable to apply until the required work has been completed and passed by their Tenancy Management Officer.

Exceptional circumstances will be investigated by the Landlord Services Team. Where emergency re-housing is necessary, these requirements may on occasion be waived.

Some transfer moves are exempt from the requirements of Part 6 of the Housing Act 1996 and will be dealt with separately. This includes assignment or succession by a relative on death of a tenant.

In certain circumstances NBBC may approach their tenant to initiate a move to a different property. This could be to meet an urgent housing need or to make better use of their housing stock. In these cases, the property concerned will be allocated outside of the lettings scheme.

Where NBBC or a Housing Association uses introductory tenancies, a transfer to another property will not be allowed during the introductory tenancy period until the tenancy becomes secure.

5.1.1 Releasing under occupied properties

NBBC Local Lettings Plan for Downsizing details the process for the allocation of current tenants who are under-occupying properties and need to downsize to smaller accommodation in accordance with the Downsizing Policy 2023.

Tenants who wish to downsize can be offered downsizing incentives, help to move, and support with your NBBC Homes application registration and expressions of interest in suitable properties. These documents are available on our website.

A tenant who is currently under-occupying at least one bedroom and wishes to move to a smaller property will be given priority to move into more suitable accommodation.

Priority can only be awarded where NBBC will be given vacant possession of the under-occupied property on the applicant being allocated a smaller property. For example, if the tenant of the property wishes to move to a smaller property, but is currently living with other people who will not be moving with him/her, the priority will not be awarded until NBBC is satisfied that the other people in the household have made their own arrangements for rehousing.

Tenants with debt or disrepair would need to demonstrate that they have an exceptional circumstance to move with debt or disrepair from their current tenancy and this will be investigated by the Landlord Services Team

5.2 Exceptional Circumstances

5.2.1 Management Moves

In certain exceptional circumstances NBBC may need to move an existing tenant to a different property. The Council will authorise the need to move, and the type/area of accommodation required. The Management Move Policy can be found on the Nuneaton and Bedworth Borough Council website - https://www.nuneatonandbedworth.gov.uk/

5.2.2 Decanting Moves

In certain circumstances NBBC may need to move an existing Tenant to a different property so urgent work can be carried out within or on their property. This move can either be temporary or permanent in accordance with the NBBC decant policy which is available on the NBBC website.

In these circumstances to meet this urgent housing need, the property concerned will be allocated outside of the Lettings Policy and will be authorised by the Landlord Services Manager.

5.2.3 Homeless Applicants

The Assistant Director for Strategic Housing can use discretion for the purposes of making direct matches to 50% of NBBC's available void properties and Registered provider stock with their agreement for Homeless Households in temporary accommodation as and when appropriate, liaising with the Housing Portfolio Cabinet member.

In all cases of exceptional circumstances all available stock will be considered, therefore existing properties on advert could be withdrawn and existing shortlists where a property has not been formally offered to an applicant could be withdrawn.

6. Refusals

6.1 Refusal to accept an offer of accommodation

If an applicant refuses three offers of accommodation within a period of six months, unless there has been a considerable change of circumstances, their application will be suspended for a six-month period of time. During this time the applicant will not be able to express their interest on any properties that become available.

Section Three - How to Apply

1. How to Apply

1.1 <u>How to apply to join the register</u>

Choice Based Lettings enables applicants to express an interest in advertised properties.

To apply for housing, all applicants must join the Housing Register by completing an on-line housing application form via the website. For those applicants who are unable to do this they may call NBBC on 02476 376406 for assistance.

All applicants will need a National Insurance number, or correspondence address to apply. If an applicant does not have a national insurance number, email address or correspondence address applicants can contact NBBC for assistance.

The purpose of the application form is to correctly identify the housing need for each applicant. The registration of an application may be delayed or cancelled unless all the information required is provided.

Once an application has been registered, the applicant will receive an email/letter advising whether they have been accepted onto the housing register or not. If their application has been successful, their email/letter will direct the applicant to the website, where they will be notified of the:

- date of registration (date the application was received)
- priority banding awarded
- application reference (for expressing an interest in properties)
- right to request a review against the decision on their priority banding.

NBBC will require confirmation of an applicant's current or previous housing history at the point of application, and updates should there have been any changes circumstances before they are offered a property. Failure to provide these details could result in their application being cancelled

NBBC will provide written confirmation of any further information that is required, and the timescales for providing these details. The timescale to provide documents will usually be within a 7-day period from the date on the letter. If the applicant is unable to provide the information that has been requested, they should contact NBBC. Failure to do so may result in their application being cancelled.

If an applicant has been nominated to a Housing Association, they will be notified via email or telephone and advised that they will be contacted in due course by the Housing Association directly. This will be treated as an offer of accommodation any further expressions of interests made for properties will be disregarded.

NBBC will work to assist and support all applicants through the process of applying for and expressing an interest on properties.

2. Banding

2.1 How bands are determined

All applicants will have their housing needs assessed and be placed in a suitable housing needs band according to their circumstances. In order to ascertain each individual applicant's requirements, the application form asks a series of questions relating to housing need. These questions are designed to ensure that those in greatest housing need are given preference when accommodation is allocated. It is essential that all of these questions are answered to ensure that we can determine and award the correct priority band.

3. Advertising Properties and Expressing Interests

3.1 How properties are advertised

NBBC will not advertise 50% of our general purpose stock, this stock will be directly matched to a family or individual, that is currently homeless, and occupying emergency temporary accommodation, this will assist the council to fulfil its duties under the Homeless Reduction Act 2017.

NBBC will advertise the remaining vacant properties through the system. However, there may be occasions, such as a property being used for an exceptional circumstance, when this is not possible. All adverts will be clearly labelled to show the property features, if the tenancy is a flexible tenancy, local neighbourhood information and the types of households that can register an interest in the property.

Flexible tenancy agreements are five-year fixed term tenancies for all new lettings of the Boroughs' four, five and substantially adapted homes. The ability for councils to use flexible tenancy agreements was introduced in the Localism Act 2011 to protect this limited resource for the future.

There will sometimes be other restrictions in the advert e.g. No Pets. Expressions of interest from applicants will only count if they can match all the requirements in the advert.

Properties are allocated in accordance with our Tenancy Policy which ensures that our tenants received the correct form of tenancy agreement and that the Council meets all applicable legal and regulatory requirements in relation to the form, use and management of its tenancy agreements.

3.2 How applicants express their interest of a property

Applicants will be able to search and view properties advertised without logging in. However, to express an interest in a property the applicant will be required to log in.

Each time an applicant expresses an interest in a property they will be reminded of the property's individual eligibility criteria. Expressions of interest from applicants will only count if they can match all the requirements in the advert. When expressing an interest in a property the applicant will be asked to confirm their contact details to ensure they are up to date.

Properties will be advertised daily on a weekly cycle. If an applicant's expression of interest for a property is successful, they will be contacted within three working days, by telephone or in writing, depending on the applicant's communication choice, by a member of the Choice Based Lettings team. It is important therefore that your contact details are kept up to date on the register in order that officers can contact you by telephone/writing or you risk an offer being withdrawn.

3.3 Offers of accommodation

Applicants will be advised of an offer of accommodation by a member of the Choice Based Lettings team and applicants will be advised if the property is currently still occupied, if the property is being repaired or if the property is ready to let.

In all circumstances and where appropriate applicants housing officers will make contact for a viewing of the property.

When the property is ready to let, the applicants Tenancy Management Officer will contact the applicant.

4. Pending Status

4.1 Further investigation of applications made

If an applicant’s housing need falls under certain categories, their application will become ‘pending’. This allows the Choice Based Letting team to further investigate their application before making a final banding decision. Applicants who may experience this include:

- Members or former members of the Armed Forces
- Those who require accessible adapted accommodation
- Those who have indicated rent arrears or previous unacceptable behaviour
- Those applicants needing to move urgently on hardship grounds. Priority at this level will only be awarded if the current situation is so significant that it will cause considerable hardship to the applicant or to others
- Those deemed as being severely, statutorily overcrowded. NBBC will determine over-crowding after considering best use of the rooms available to the household and whether the applicant has deliberately worsened their own circumstances
- Applicants who are in short-term supported housing and are required to move on to alternative accommodation urgently. Confirmation of these circumstances will be required from the organisation providing the supported accommodation
- Families forced to live apart (where they have previously lived together) except where it could reasonably be expected for both parents to live in either of the homes that they occupy

5. Accessible Properties for applicants with Disabilities

5.1 Applicants with disabilities

Accessible properties are homes which have been designed for, or significantly adapted to meet the needs of applicants with physical or sensory disabilities.

Applicants with an assessed need for accessible accommodation will be given priority over other applicants who are in the same band rating who do not have need for accessible accommodation. The property advert will make this clear. The advert will also describe the accessible features, together with local neighbourhood information, to help customers choose whether to express an interest in that property or not.

In selecting an applicant for an accessible property from the short-list of qualifying applicants, the full circumstances of each case will be considered before deciding who will be offered the property. In some circumstances priority may be given outside of date order if the vacancy is particularly suitable for the needs of an applicant.

On occasions, the Authority may seek the assistance of an occupational therapist for guidance of property suitability. Applicants will be advised if this is a requirement and the reasons why by the Choice Based Lettings team. Where required, the occupational therapist / housing assessment officer will either be requested to accompany the applicant to view a property to ensure that the property is suitable for the applicant’s needs or be asked for professional advice to support the Authority with the allocation process.

Applicants with an existing Occupational Therapist will need to liaise with the Choice Based Lettings team to organise an accompanied viewing or to seek advice. An allocation will not routinely be awarded unless the property is deemed suitable for the applicant’s needs with minor adjustments. Allocations requiring major adaptations will be assessed on an individual basis and the availability of adaptable homes.

Applicants in this category can also express an interest in properties which do not have accessible features. However, if they are short-listed during the selection stage, NBBC will assess whether it is reasonable and practicable for the property to be adapted. These applicants will be considered for the property on the same basis as the other applicants who have submitted an expression of interest.

6. Home Visits

6.1 <u>Home visit to access applicant’s household need</u>

Home visits may be carried out to assess some applications where appropriate. A home visit can enable a landlord to better understand an applicant’s individual circumstances, ensure the correct category has been given to their application and give advice about how their housing needs can be met. If a home visit is deemed necessary, NBBC or the Housing Association, will inform the applicant directly.

7. Change of Circumstances

7.1 <u>Applicants circumstance changes</u>

Applicants who move to a new address or whose circumstances change after they have been accepted onto the Housing Register (e.g. someone joining or leaving their household) should immediately update their application. This can be done via the website. Failure to do so could result in their application being rejected.

If the change of circumstances affects the applicant’s banding priority, the outcome of the applicant’s reassessment will be sent to them via email.

8. Housing Register Review

8.1 <u>Annual Review of housing applications</u>

A review of all applications on the Housing register will be administered every 12 months. This review will ask applicants if they wish to remain on the register, if so, applicants will be asked to log into their application and tick the appropriate box, to advise that they wish to remain on the register.

On the 12-month anniversary of registration an email or letter will be triggered, depending on the applicant's communication method. The applicant will be asked to confirm whether they still wish to remain on the Housing Register or not. The email/letter will ask the applicant to login within 28 days, to tick the box to advise they wish to remain. If, after this period of time, the applicant has failed to log in as requested, their application will be deleted and the applicant's status with NBBC will be set to "cancelled' and removed from the Housing Register.

If applicants have any difficulties with the system, they are advised to contact NBBC for assistance.

9. Cancelling Applications

9.1 <u>NBBC Cancelling Applications</u>

Applications will only be cancelled (and removed from the Housing Register) in the following circumstances:

- A request has been received from the applicant (or via their advocate) in writing
- The applicant has been re-housed
- Notification has been received from an executor or personal representative that the applicant is deceased, and he / she was the sole applicant
- It is discovered that the applicant has given false or misleading information in their application
- Evidence is obtained that the applicant is no longer eligible
- If information requested remains outstanding after exceeding the timescale date of the email/letter being sent to the applicant requesting the information

Applicants will be notified by email/letter, depending on the applicant's communication method, of the reason(s) why their application has been cancelled and informed of their right to request a review of the decision.

Should an applicant whose application has been cancelled wish to re-join the register, they will receive a new effective date.

Section Four - Reasonable and Additional preference

1. **Reasonable Preference and Additional Preference**

NBBC will give ‘reasonable preference’ and ‘additional preference’ to certain applicants as outlined in the Housing Act 1996

1.1 <u>Housing Need (Reasonable Preference)</u>

The reasonable preference categories as set out in s167 (2) of the Housing Act 1996 and the Homelessness Act 2002 are detailed below. The NBBC letting scheme places applicants who meet this criteria into Band 1 or 2

- Applicants who have been accepted by the Local Authority of owing a Prevention or Relief Duty. This band will only be awarded where all of the qualification criteria of the policy is met
- Applicants occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
- Applicants who need to move on medical or welfare grounds, including grounds relating to a disability
- Applicant who needs to move to a particular locality in the district of the housing authority, where failure to meet that need would cause hardship (to themselves or others)
- Applicants with succession rights to a council property or No Succession Rights who are ‘Left in Occupation’ where it has been determined that a suitable alternative property is required

1.2 <u>Exceptional Housing Need (Additional Preference)</u>

The Housing Act 1996 allows those applicants that have high needs to be awarded additional preference. Applicants must meet a reasonable preference category to be considered for ‘additional preference’. The additional preference categories are: -

- Those who need to move urgently because of a life-threatening illness or sudden disability
- Families in severe overcrowding which poses a serious health hazard
- Those who have been accepted as homeless and are owed a full housing duty in accordance with the Homeless Reduction Act
- Tenants releasing under occupied properties
- Member of the Armed and Reserve Forces
- Members of the Armed Forces and former Service personnel, where the application is made within five years of discharge
- Bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner
- Serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained because of their service

<u>Domestic Abuse</u>

- NBBC are committed to ensuring the safety of its tenants, leaseholders and applicants who wish to apply for housing.
- The Council believes that all forms of domestic abuse are unacceptable as detailed in the Domestic Abuse Policy which sets-out not only the Council’s responsibilities under the Domestic

Abuse Act 2021, but what further action the Council will take to support domestic abuse victims and their families in partnerships with other agencies.

- Victims of domestic abuse or threats of domestic abuse, or escaping domestic abuse or harm, will be exempt from local connection requirements and other requirements of the Housing Allocation Policy as defined in the Domestic Abuse Act 2021, as will those who have sought a place of safety in a refuge or other form of temporary accommodation in the Local Authority area.
- NBBC have a dedicated Domestic Abuse Co-ordinator to support customers and work with partners to deliver the requirements of the Domestic Abuse Act 2021.

Section Five - Banding

1. Banding

1.1 <u>The banding process</u>

There are 4 priority bands that an applicant can be placed into. Each question on the application will be weighted so the system is able to determine housing need.

The four bands are:
- Band 1+ - Highest need with additional preference for re-housing
- Band 1 - Urgent need for re-housing
- Band 2 - Priority need for re-housing with no statutory duty
- Band 3 - Low need for re-housing with no statutory duty

The bands described above also refer to different levels of High, Medium and Low, Medical / Welfare and Hardship. In each case evidence will be required to support each applicant's case.

- **Medical** - The information received will need to indicate that a move will benefit the health of the applicant or their household for medical priority to be awarded.

  When determining the level of medical need, an applicant will be assessed to consider whether the provision of adaptations in their existing accommodation as an alternative will assist with improving their housing circumstances.

- **Welfare** - Applicants with care or support needs, or other social needs, may need to move to alternative accommodation on welfare grounds. For priority to be awarded on welfare grounds evidence will be required to support the case; this could be from the police, social services or other professional agencies involved with the applicant.

- **Hardship** – Applicants need to move to a specific locality in order to give or receive care, be able to access specialised medical treatment or take up particular education, employment or training opportunity in a particular Local Authority district, and/or applicants who have specific financial hardship related to their housing.

1.2 The Bands in More Detail

1.2.1

Band 1+ This is the highest priority band. Applicants in the following circumstances will be placed in this band	
Additional Preference	Applicants assessed as having a priority and an additional preference • Those who need to move urgently because of a life-threatening illness or sudden disability. • Families in severe overcrowding which poses a serious health hazard. • Those who are homeless and require urgent re-housing because of violence or threats of violence, including intimidated witnesses, and those escaping serious anti-social behaviour or domestic violence. • Those who have been accepted as homeless and are owed a full housing duty as described in the Homeless Reduction act • Tenants Releasing Under Occupied properties • Member of the Armed and Reserve Forces

1.2.2

Band 1 This banding is for applicants who are deemed to have an urgent need for re-housing. Applicants in the following circumstances are deemed to have an urgent need	
Homeless	Applicants assessed as homeless under the Prevention or Relief duty of the Homeless Reduction Act. Applicants must meet the qualification criteria of the policy to be eligible.
Emergency	Applicants who are required to leave their homes because of an emergency Prohibition Order served in relation to the premises under the Housing Act 2004. This will also apply to applicants affected by any regeneration schemes
Overcrowded	Applicants who are overcrowded because their present home is short of at least 3 bedrooms.
Harassment or Violence	In circumstances of serious harassment or violence, evidence will be required to support the case.
Housing Conditions	Applicants living in unsafe or unsanitary housing conditions (as defined by the Housing Health and Safety Rating System (HHSRS) where there is a high risk of harm.
Left in Occupation of a Council Tenancy	Applicants with succession rights to a council property or No Succession Rights who are 'Left in Occupation' where it has been determined that a suitable alternative property is required
High Hardship Need	Where an applicant needs to move as their current situation is causing significant hardship to the applicant or to others of which could relate to: • Giving or receiving care, being able to access specialised medical treatment. • Specific financial hardship related to their housing need will be required to provide evidence to support their case.
High Welfare Need	• Where an applicant needs to move as their current situation is causing a significant impact of the wellbeing of the applicants. • Where there is a life-threatening situation developing if the applicant is not re-housed from their existing neighbourhood. • There is evidence of a dangerous and unsafe physical environment. • There is clear evidence that there would be significant health improvement if re-housed. • An applicant with a high degree of vulnerability and their housing situation is having an effect on their quality of life.
High Medical Need	• Where applicants are unable to continue to occupy their current accommodation due to a significant high need or disability. • Where the illness is likely to seriously deteriorate, become life threatening or it is no longer reasonable for the applicant or household member to stay in the present accommodation. • Where the accommodation is causing an increasingly detrimental effect on their mental illness. As a result, there is in an inability to cope. • When there is a high risk of or actual breakdown. • When moving is essential to avoid loss of life.
Occupants of Supported Housing	NBBC work with partners who supply move on accommodation and have adopted a move on protocol (see appendix 1. For qualification criteria)

1.2.3

Band 2 Applicants in the following circumstances are deemed to have a priority need for re-housing with no statutory duty	
Homeless	Applicants who are assessed as homeless or threatened with homelessness, but where there is no statutory duty to provide housing.
Overcrowded	Applicants who are overcrowded because their present home is short of at least 2 bedrooms.
Sharing facilities	Applicants who have to share facilities with more than one household. A household is defined as an applicant or somebody who normally resides with them and it is deemed reasonable that they would continue to live with them
Living Apart	Applicants who have no permanent address and have to move between family and friends
Medium Hardship Need	Take up particular education, employment or training opportunities in a particular Local Authority district
Medium Medical Need	• When change of property would significantly improve the applicant's or household member's illness or disability. • Where the illness is likely to deteriorate, it is no longer reasonable for the applicant or household member to stay in the present accommodation. • Where the accommodation is causing a detrimental effect on their mental illness and a change of property would assist.
Medium Welfare Need	• Where the current accommodation may be one of the causes of stress/distress to the applicant or household member. • Where there are concerns that the type of property and surroundings are affecting the situation and a change in property would significantly improve this • Where the applicant or a member of the household is experiencing difficulties within the household that is affecting the wellbeing of the applicant or a household member.

1.2.4

Band 3 Applicants in the following circumstances are deemed low priority with no statutory duty:	
Overcrowded	Applicants who are overcrowded because their present home is short of 1 bedroom.
Single applicants low housing need	Single applicants who have always resided at their parental home and have low housing need.
Low Hardship Need	Applicants who need to move to a particular area due to a low need of supporting a vulnerable relative.
Low Medical Need	• Where there is some concern about physical safety, and re-housing may improve health, and a change in property would moderately improve the health of the applicant or household member • Where there is some concern that the type of property and surroundings may affect illness and the applicant may need assistance from other agencies. A change of property would moderately improve this.
Low Welfare Need	Where there is some concern that the current accommodation contributes to social isolation, restricts independence and re-housing may be required to prevent deterioration in health.

2 Further Information about Certain Categories

2.1 Homeless Applicants

All Local Authorities have a legal duty under Part VII of the Housing Act 1996 (as amended by the Homelessness Act 2002) and the Homeless Reduction Act 2017 to ensure that homeless applicants owed a full housing duty are provided with suitable accommodation. Applicants meeting these criteria will be placed into band 1+.

The Housing Solutions team will express an interest on the behalf of homeless applicants on all ‘suitable’ properties that become available. NBBC will not advertise 50% of our general-purpose stock, this stock will be directly matched to a family or individual, that is currently homeless, and occupying emergency temporary accommodation, this will assist the council to fulfil its duties under the Homeless Reduction Act 2017. Only one offer of suitable accommodation will be allocated per homeless applicant.

When acknowledged as being homeless, the applicant’s acceptance letter will provide any exemptions to this e.g. to be housed in Nuneaton only, Bedworth only or not to be housed in a specific area for a reason that is supported and evidenced by the Housing Solutions Officer before determining the homeless case.

NBBC will work with all applicants who are in the Prevention or Relief stage of the Homeless Reduction Act to provide them with assistance and options appropriate to their individual situation in accordance with their personal housing plan.

Please note: Where the Authority owes a statutory duty under the Homelessness Legislation, certain criteria within the Allocations Policy may be waived and applicants may be placed within the additional preference category.

Alternatively, applicants could be exempt from the additional preference category and given a reduced preference.

All cases will be referred to either the Tenancy Services Manager and the Housing Solutions Manager for authorisation. All of the facts, including documentary information will be considered before deciding if the criteria are to be waivered or if an exemption is reasonable. For example, in terms of an exemption, applicants with rent arrears will need to provide clear information about the reasons for the rent debt explaining the steps they have taken to address the issue.

Where authorisation is not granted the application will be given a reduced preference for a sufficient time to give applicants the opportunity to address the issue. For example, applicants with former tenant rent arrears will need to reduce the arrears.

2.2 Serious Harassment or Violence

In circumstances of serious harassment or violence, evidence will be required to support the case. An investigation will be carried out in conjunction with other agencies as appropriate. Examples of serious harassment or violence include, but are not limited to:

- An applicant suffering domestic abuse from a partner, former partner or relative with whom they currently reside and for whom the use of an injunction or other form of legal action may not be appropriate

- An applicant suffering serious harassment and legal remedies are not working or are inappropriate. Harassment implies a degree of deliberate intent with some underlying motive and can be distinguished from neighbour disputes or nuisance

2.3 <u>No Priority</u>

No award will be given if the:

- stress/illness will not be improved by re-housing
- interruption is of a temporary nature
- existing property is adapted to meet the needs of the applicant/ family members or further adaptations are required and are practical
- the applicant is adequately housed

Section Six - Allocation of Properties

1. Allocation of Properties

1.1 Application Shortlist

Once the deadline of the advertising cycle has been reached, and before the properties are allocated, a short list of applicants is created for each property

Expressions of interest in a property are shortlisted in a number of ways:

Banding - Expressions of interest on a property are sorted by order of priority, with Band 1+ coming top of the list as this banding represents those applicants in highest housing need, followed by band 1, band 2 and finally applicants in band 3.

Application Date - If two or more applicants within the same band have expressed an interest in the same property for which they qualify, their application date, or the date they entered their current band, will be used to determine the higher priority. In the rare instance that the band date is the same, whichever applicant expressed an interest in the property first will be successful.

Assessed Housing Need - Where properties are targeted at specific people, they will be advertised as such and those applicants with assessed need for that type of accommodation e.g. accessible accommodation for people with disabilities or new build properties where certain eligibility rules apply under special Planning requirements (Section 106 Agreements) will be given priority over those applicants without an assessed need.

Local Connection Criteria - Local Connection Criteria, as outlined in section two will also be taken into consideration when prioritising applicants.

If an applicant is positioned first for more than one property, and provided the eligibility criteria are met, they will be contacted to make a decision about which property they wish to accept.

1.2 Best Use of Stock

Accommodation will normally be offered according to an applicant's needs. All properties will be clearly labelled in a way that provides as much information as possible to show who is allowed to apply for the property concerned – for example by indicating family size or age of applicant. Properties will be allocated in a way that makes the best use of the housing stock.

1.2.1 Best use of housing stock criteria:

- One bedroom for each adult or couple, who live together as a ‘household’ or family unit. Two adults in the same property who are not a couple will be allowed a bedroom each
- A child under the age of 16 will be expected to share with another child of same sex, while children under the age of 10 will be expected to share with other children regardless of sex
- A bedroom will be allowed for a non-resident carer where it is proven that they provide overnight care to a person with a disability and need a bedroom to deliver the care
- Independent Living accommodation will be allocated to applicants aged 55 or over (50 to 55 with high needs).
- Bedsits will be allocated to single people only

- Ground floor accommodation will only be allocated to applicants with an assessed medical or mobility need for ground floor living.
- An expected child is included once the applicant is over 24 weeks pregnant unless the applicant falls under an Additional Preference category

Where an applicant does not meet the criteria outlined, they will not be considered for the property. In certain circumstances NBBC reserves the right to modify the criteria at their discretion particularly where enforcing the criteria would result in unfairness to the particular applicant or other applicants generally. For example, the size of the bedrooms in a property and the relationship between those sharing a bedroom may be taken into account as well as the sex of the children when carrying out an overcrowding/bedroom shortage assessment.

The Council recognise that there may be exceptional circumstances where it becomes necessary to reconsider the criteria in the case of individual applicants who would not normally qualify.

The Council may reconsider the qualification of individuals in extreme exceptional circumstances, where there is a threat to life, no other housing options are available for homeless applicants where all prevention and relief options have been exhausted.

In addition, for extremely vulnerable homeless applicants to move from a temporary tenancy to an introductory tenancy. In this circumstance to meet this urgent housing need, the property concerned will be allocated outside of the Lettings Policy and will be authorised by the Housing Solutions Manager.

1.3 Succession Rights and ‘Left In’ Occupation

For new tenancies that began after the 1st of April 2012, the succession rights have changed for tenants. Under the new regulations only a spouse or partner can succeed to a tenancy after the death of a tenant. For all other tenancies which started before 1st April 2012 succession rights remain the same.

When a tenant has succeeded to a tenancy, but the property is more extensive than they need, the tenant may be asked to move to more suitable accommodation.

In these circumstances, a reasonable alternative housing offer will be made. If this offer is not accepted, possession of the property may be sought through the Court.

No Succession Rights and ‘Left in Occupation

When an applicant does not have a right to succeed to a tenancy but is left in occupation on the death of the tenant, NBBC may consider whether the applicant:

- Has been living with the tenant for 12 months before the tenants' death as his or her main and only accommodation

OR

- Has accepted responsibility for the tenants' dependants and therefore requires occupation of this property in order to comply with their legal guardianship of the deceased’s dependants

Depending on the applicant's circumstances, NBBC may consider granting a tenancy to the remaining person or persons. This could be either in the same home or in suitable alternative accommodation.

Applicants must be able to evidence that they have lived in the property for a minimum of 12 months using the property as their main and principal home.

Applicants who have not lived in the in property for 12 months must be able to evidence that they used the property as their main and principal home to give care and support.

Each case will be investigated by the Landlord Services Team.

If the applicant is to be allocated another property, the applicant will be awarded a reasonable preference, and one reasonable offer only may be made. If that offer is refused, possession of their current residence may be sought through the Court.

1.4 Access to Children

For those applicants who require an additional bedroom for access purposes, appropriate information to verify these circumstances will be required. Examples of suitable documentation include (but are not limited to) a copy of the Court Order, if one is in place, or a Residency Order and proof of Child Benefit. Each case will be assessed on an individual basis.

If an applicant has regular access to their children but there is an arrangement for them to live mainly elsewhere, they will be able to express an interest in properties that are advertised, but preference will be given to applicants with children who are permanently living with an applicant.

It should be noted that Housing Associations who provide nomination rights to the Council may not allow applicants with access to children an extra bedroom. Advice with regard to welfare benefit entitlements will be given before applicants are selected for properties where they may be deemed to have a spare bedroom.

1.5 Local Lettings Policies

From time-to-time NBBC may agree a Local Lettings Policy for specific areas, individual properties or developments in order to reflect local circumstances. Any such policy will have regard to considerations such as the social mix, density, and age and community stability of the area. Any such policy will be time limited, but during that time properties may be let to applicants outside the normal rules for priority and banding included in this policy.

1.6 New Affordable Housing Developments

The Local Lettings plan for new builds confirms the process by which the Council’s new build properties, and those of partner Registered Providers will be allocated. Applicants will be able to use the Council’s Choice Based Lettings system to register as normal and become LIVE applicants, banded according to their housing need in line with the current Housing Allocations Policy. At the point of advert however, reference to this Local Letting Plan divide the allocation of the properties by the following percentages: -

1. 40% of units will be advertised for those applicants that are currently Council or Housing Association tenants needing to upsize, or downsize, according to their housing needs. (Transferring tenants)

2. 30% of units will be advertised for those applicants registered in Band 1+

3. 30% of units will be advertised for those in bands 1 to 3 (inclusive)

1.7 Support for Vulnerable Applicants

NBBC will ensure that vulnerable applicants are able to access the scheme. When a vulnerable applicant is identified, every effort will be made to assist and support them through the application process. Some applicants will require or request support and assistance with accessing information about available properties, expressing an interest or making a decision about an offered property. In all cases the level and type of support required will be decided on an individual basis. In some cases, however, NBBC may have to use specialist staff to express an interest on their behalf.

A number of measures will be put in place to ensure that vulnerable applicants are not disadvantaged for example through:

- Providing appropriate advice and assistance
- Providing information in other formats
- Partnership working with support agencies
- Translating key documents
- Ensuring appropriate support is available for applicants using the system

NBBC would like applicants, whatever their background or presumed ability, to become active participants in the choice-based lettings process. However, NBBC recognises that in limited circumstances it may be necessary to place certain vulnerable applicants outside of this process, and to allocate properties to them.

1.8 Applicants ready to move on from Supported Accommodation

Applicants moving on from agreed partnership accommodation (see Appendix 1) must register on NBBC Homes and follow the application process set out in Section 3: How to Apply.

Applicants will normally be required to have successfully completed a minimum of nine months in supported accommodation before being considered ready to move on. An email referral will need to be sent to the Choice Based Lettings at CBL@nuneatonandbedworth.gov.uk

Where an applicant is considered ready to move on prior to completing six to nine months, the relevant Support Agency must confirm that the applicant has fully met all agreed support outcomes and can sustain independent accommodation.

Applicants who have not yet completed the required six-to-nine-month period may be registered on NBBC Homes in a suspended status. The application will remain suspended until the Support Agency confirms that the applicant is ready to move on.

The Choice Based Lettings Team will consider all information when determining whether the application can be made active.

1.9 Viewing Properties and Receiving Offers

When an applicant is offered a property, NBBC will contact the applicant to request any outstanding documentary evidence required for an offer. Applicants will be contacted by the telephone number and email address provided on their application. If the Choice Based Lettings team are unable to make contact within a three working day period, the potential offer will be withdrawn. It is the applicant's responsibility to be available for any potential offers and advise the Choice Based Lettings team of any unavailability.

Once the applicant has been formally offered a property, they will have the opportunity to the view the accommodation with a Tenancy Management Officer before signing for the tenancy. For Independent Living accommodation the Independent Living Officer will show the applicant around the property.

The Tenancy Management Officer will make contact by the telephone number and email address provided on the application to view the property before signing for the tenancy. If the Tenancy Management Officer is unable to make contact within a three working day period, the offer will be withdrawn. It is the applicant's responsibility to be available for any viewings / offers and advise the Choice Based Lettings team of any unavailability.

1.10 <u>Mutual Exchange</u>

A mutual exchange is the swapping of homes by two or more council housing tenants without having to go through the housing application and bidding process. In a mutual exchange tenants can not only swap properties but may also step into each other's shoes in respect of the terms and conditions which govern the tenancy.

Council housing tenants can register with www.homeswapper.co.uk free of charge to search for a mutual exchange

HomeSwapper can help you to swap your council or housing association home with other social housing tenants (secure tenants only).

You can add your mutual exchange to the website; it is quick and easy. Your advert will be seen by thousands of people that use the website to arrange a Council house swap.

1.11 <u>Independent Living Accommodation</u>

The following criteria explains the eligibility criteria for applicants who wish to express an interest in Independent Living Accommodation.

Independent Living Accommodation aims to give our tenants, security of tenure, support to enable them to remain independent in their own home for as long as possible, time to listen to views, concerns and questions, dignity, respect and excellent customer care

All properties are linked to the Councils control centre to provide 24 hours, 7 days a week, 365 days a year emergency cover.

Properties are allocated to applicants aged 55 or over with a low, medium or high, welfare, medical and hardship need and to those aged 50-55 with a very high, welfare, medical or hardship need. A full explanation is available in the Bands in More Detail Section, below is a summary: -

Medical Grounds

Evidence will need to be provided to understand how a move from the applicants' current accommodation will assist with their housing need. Priority may be awarded as High, Medium or Low the evidence received should advise how the move will directly benefit the health of the customer or their household.

Welfare Grounds

Evidence will need to be provided to understand how a move from the applicants' current accommodation will assist with care or support needs. Priority may be awarded as High, Medium or Low depending on if the evidence received will assist with care or the support needs of the customer or their household.

Hardship Grounds

Evidence will need to be provided to understand how a move from that applicants' specific locality will improve hardship or to give or receive care or take up particular education, employment or training in a particular Local Authority district.

Applying for properties

Once your need level has been established you will be awarded a band on the system which will enable you to express an interest in properties. If applicants need any further assistance on how to express an interest, please contact a member of the Choice Based Lettings Team.

Pets

All tenants must request permission before bringing a pet into their home. This generally relates to cats and dogs as they have the potential to have an impact on the scheme.

Under no circumstances will permission be granted where the pet poses a potential risk or threat to other tenants, staff or visitors to the scheme. Permission will always be refused for animals that are restricted by law, for example under the Dangerous Dogs Act and the Protected Species Acts. For more details regarding the pet policy please visit the Nuneaton and Bedworth Borough Council www.nuneatonandbedworth.gov.uk

Exclusion due to unacceptable behaviour

When deciding whether an applicant is eligible for Independent Living Accommodation, NBBC will consider the behaviour of not only the applicant but also that of the other members of their household. NBBC may decide that an applicant should be treated as ineligible for independent living housing. A decision letter will be given in writing advising of the applicant's rights to appeal this decision. It will also advise if the applicant qualifies for our general-purpose stock or if the applicant is not eligible for housing.

1.12 Reviews

Applicants have the right to request a review of decisions made in the allocation process.

The applicant’s request for a review of the decision must be made within 21 days of the date on their decision letter. The applicant should provide supporting evidence if necessary and explain why they require a review of the original decision.

An independent Senior Officer will investigate the review (this Officer will not have been involved in the original decision-making process). The Officer will consider the evidence provided and decide whether to overturn or support the original decision. The applicant will be informed in writing within 8 weeks of the day the review request was received. The reply will contain the decision made, the reasons for the decision and the facts considered when making the decision.

Whenever necessary, the Local Authority will also communicate with applicants via other means, such as email, telephone/videotelephone, letter/leaflet or in-person.

There is no further right of appeal if the applicant is not satisfied with the decision on review. Any further challenge would have to be through the Courts by way of Judicial Review or by taking their case to the Local Government Ombudsman.

1.13 Making a Complaint

If an applicant is dissatisfied with any aspect of the way in which their application for housing is dealt with, they should contact NBBC. All applicants who make a complaint will be treated fairly, objectively and in line with NBBC’s Complaints Policy. A reply to the complaint should be received in writing within 10 working days.

Whenever necessary, the Local Authority will also communicate with applicants via other means, such as email, telephone/videotelephone, letter/leaflet or in-person.

Applicants should seek their own legal advice if they are dissatisfied with any decision made by the authority in relation to an application made under this Scheme. If an applicant is dissatisfied with how their application and any subsequent complaint has been handled by the Local Authority, they will be informed of their right to make a claim of maladministration to the Local Government & Social Care Ombudsman.

Appendix 1

NBBC Move-On Protocol

To be considered for move-on, residents must meet all NBBC eligibility criteria and have engaged meaningfully with their supported accommodation for six to nine months, unless there are exceptional circumstances. They must also meet the NBBC Allocations Policy, including having a local connection, an identified housing need, and no unresolved barriers such as unmanaged ASB or outstanding risk concerns. Residents must show they have the skills, stability, and resilience required for independent or semi-independent living. Partners who have signed up the Move on Scheme are P3, Doorway and St. Basils.

2. NBBC Responsibilities

NBBC is responsible for assessing all Move-On Protocol referrals consistently and fairly. This includes verifying that the resident meets Allocations Policy eligibility, reviewing evidence submitted by the provider, and awarding the appropriate band. Where information is missing or unclear, NBBC will request further clarification to ensure decisions are fully informed. Once a decision is made, NBBC will communicate outcomes to both the provider and the applicant and will ensure that reasons for refusal or delay are clearly explained.

NBBC also oversees the allocation process by advertising available properties through NBBC Homes and informing residents and providers when a bid has been successful. The Council coordinates viewings, confirms suitability, and applies the reasonable refusal policy fairly and consistently across all applicants. In cases involving safeguarding or risk issues, NBBC will review updated risk assessments and engage with multi-agency partners where necessary.

3. Support Provider Responsibilities

Support providers are responsible for ensuring that residents engage fully with their supported accommodation placement, and for evidencing this through accurate and timely recording. They must communicate proactively with NBBC where suitability or engagement issues arise.

During the allocation process, providers must assist residents with bidding on NBBC Homes and ensure that regular bids are placed until a suitable offer is made. They are expected to help residents attend viewings, assess suitability, and prepare for tenancy start-up by supporting benefit claims, financial planning, and practical arrangements. Providers also hold a responsibility to manage safeguarding and risk throughout the process, keeping NBBC informed of any changes that may impact the resident’s ability to move on.

After the tenancy begins, providers must ensure that referrals for floating support are completed if required, deliver agreed levels of support, and report any tenancy concerns to NBBC promptly to prevent tenancy breakdown.

4. Applicant Responsibilities

Applicants are expected to take an active and responsible role in their move-on process. They must engage with their support plan over the required six-to-nine-month period, attend keywork sessions, and work toward developing the skills necessary for independent living.

Applicants are responsible for engaging proactively with the bidding process, attending viewings, and cooperating with both NBBC and their support provider.

They should only refuse property offers where there are reasonable grounds, as unreasonable refusals may impact their housing priority. Prior to moving, residents must complete necessary financial and practical steps to prepare for their tenancy and engage in floating support or ongoing support services where these are identified as necessary.

Appendix B

Section	Page	Current Position	Proposed Amendment
Section 2	7	Eligibility is assessed in accordance with housing legislation and immigration eligibility rules.	**New Statutory Eligibility wording:** "Applicants must be eligible for an allocation of housing accommodation in accordance with Part 6 of the Housing Act 1996. The Council will not allocate housing accommodation to any person from abroad who is ineligible under Section 160ZA of the Housing Act 1996. Eligibility shall be determined in accordance with Sections 160ZA(2) and 160ZA(4), together with any regulations made by the Secretary of State and any subsequent amendments to legislation."
Section 3.1.2 Local Connection	8	Applicants must have lived within the Borough for at least 6 out of the last 12 months, or 3 out of the last 5 years.	Replace with: "Applicants must have lived within the Borough continuously for a minimum period of two years immediately preceding the date of application."
Section 3.1.2 Local Connection – Statutory Exemptions	8	No specific exemption wording within the local connection criteria.	Add: "This requirement will not apply where legislation requires reasonable preference to be afforded, including applicants owed homelessness duties, victims of domestic abuse, qualifying Armed Forces applicants, or any other groups protected by legislation or statutory guidance."
Section 3.1.3 Exclusion Due to Unacceptable Behaviour	8-9	Applicant excluded for 6 months where behaviour demonstrates	Replace with: "Where the Council determines that an applicant or member of their household has engaged in behaviour serious enough to render them unsuitable to be a tenant, the applicant may be

		unsuitability to be a tenant.	disqualified from joining or remaining on the Housing Register. Disqualification will normally apply for a period of up to 12 months, subject to review of individual circumstances."
Section 3.1.3 Assessment of Unsuitability	9	General assessment criteria already included.	Add: "Each case will be considered individually taking account of the seriousness of the behaviour, mitigating circumstances, safeguarding considerations, evidence of changed behaviour and whether the applicant remains unsuitable at the time a decision is made."
Section 3.1.3 Unacceptable Behaviour List – Sexual Offences	9	No specific reference to sexual offence orders.	Add bullet point: "Persons convicted of serious sexual offences or subject to a Sexual Harm Prevention Order (SHPO), Sexual Risk Order (SRO), Sexual Offences Prevention Order (SOPO), or successor legislation, where the Council determines the behaviour renders them unsuitable to be a tenant."
Section 3.1.3 Unacceptable Behaviour List – Convictions	9	General reference to criminal and anti-social behaviour.	Add bullet point: "Relevant convictions relating to any of the categories of unacceptable behaviour listed within this section may be considered when determining whether an applicant is suitable to be a tenant."
Section 3.1.3 Noise Nuisance	9	"Noise nuisance continuing for long periods of time."	Replace with: "Persistent noise nuisance evidenced through tenancy enforcement action, statutory nuisance investigations or partner agency records occurring over a continuous period of three months or more."

Section 3 – Qualification Criteria / Removal from Register	10	No explicit clarification regarding statutory housing duties where applicants do not qualify.	Add: "Applicants who fail to meet the qualification criteria may be removed from, or refused entry to, the Housing Register. Such decisions will not affect the Council's statutory duties to provide homelessness assistance, housing advice or any service required by legislation."
Section 4.1.2 Additional Preference – Armed Forces	19	Already includes former service personnel within five years of discharge, bereaved spouses and qualifying reservists.	No substantive amendment required. Existing provisions already provide preference for eligible veterans and former service personnel.
Section 5.1.2.1 Band 1+	21	"Member of the Armed and Reserve Forces."	Replace with: "Current members of the Regular or Reserve Armed Forces; former members of the Armed Forces; bereaved spouses or civil partners of Armed Forces personnel; and serving or former members of the Reserve Forces who require rehousing due to a serious injury, disability or medical condition sustained through service."
Section 6.	28	Local Lettings Policies may be used for time-limited periods and allow allocations outside normal priority rules.	Add: "Any Local Lettings Policy shall be subject to approval through the Council's approved governance process, currently via an Individual Cabinet Member Decision (ICMD), or any successor decision-making process adopted by the Council."
Section 6.1.7 Support for Vulnerable Applicants	29	Council may place vulnerable applicants outside the normal lettings process.	Replace with: "In exceptional circumstances, where there are significant safeguarding, medical, welfare or homelessness considerations, the Council may authorise a direct allocation outside

			the normal Choice Based Lettings process. Such decisions must be supported by written evidence and approved in accordance with the Council's governance and delegation arrangements."
Section 6.1.7 Definition of Vulnerable Applicant	29	No formal definition included.	Add: "For the purpose of this policy, vulnerable applicants are those whose housing needs are significantly affected by medical, welfare, disability, safeguarding, mental health, domestic abuse, care and support needs, or other exceptional circumstances requiring additional assistance."

Summary

1. Section 160ZA statutory eligibility wording.
2. Two-year local connection requirement.
3. Statutory exemption wording.
4. Increased exclusion period (up to 12 months).
5. Individual proportionality assessment.
6. Sexual offence orders.
7. Convictions for listed behaviours.
8. Defined noise nuisance period.
9. Clarification regarding homelessness and statutory duties.
10. Veteran clarification within Band 1+.
11. Local Lettings Policy governance.
12. Vulnerable applicant governance.
13. Formal definition of vulnerable applicant.

Appendix C

Equality Impact Assessment - Screening

Name of Policy/Procedure/Service	Housing Allocation Policy
Service Unit	Social Housing
Date of Implementation	TBC

Does this policy/procedure/service have any differential impact on the following groups/people? (please tick):

Group	**This may have a positive impact**	**This may have a negative impact**	**No adverse impact**
Age	X		
Disability	X		
Gender			X
Gender Reassignment			X
Marriage and Civil Partnership			X
Pregnancy and Maternity	X		
Race – which includes ethnic or national origins, colour, caste or nationality			X
Religion or Belief – this also includes no religion/belief			X
Sexual Orientation (Including LGBT)			X

impact on Serving and/or Ex Serving Armed Forces Personnel and their families	X		

<u>Please tick if you believe that this document:</u>

Should proceed to a Full Impact Assessment ☐
Red

Needs some minor changes, but does not need a Full Impact Assessment ☐
Amber

Needs no further action X
Green

Recommendations (If any):

No adverse impact has been identified on any of the protected characteristics. This Policy may have a positive impact on some of the characteristics highlighted above. The changes have been developed following a review of the Council's current policy to ensure ongoing compliance with housing legislation, statutory guidance and best practice.

Signed	
Officer completing assessment	Craig Dicken
Date	10th August 2026

AGENDA ITEM NO.9

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	9 September 2026
Subject:	Community safety improvements to Pool Bank Street Car Park
Portfolio:	Councillor J Groves - Town Centre Regeneration and Business Development
Responsible Officer:	Assistant Director for Economy and Communities
Corporate Plan – Theme:	Housing, Health and Communities
Corporate Plan – Aim:	Work with partners to prioritise community safety and empowerment.
Ward Relevance:	St Mary's
Public or Private:	Public
Forward Plan:	Yes
Subject to Call-in:	Yes

1. Purpose of report

1.1. To provide an overview of proposed community safety improvements following consultation with local stakeholders. To seek authority to carry out changes proposed to Pool Bank Street car park.

2. Recommendations

2.1. That authority is delegated to the Assistant Director, Economy and Regeneration and Communities and Community Safety Manager to carry out the installation of additional signage and flow plates.

3. Background

3.1. This car park is located near to the town centre and adjacent to Pool Bank recreation ground. There are a few community organisations in the immediate vicinity of the car park who use this car park, particularly in the evening and weekends.

3.2. The area is impacted by several community safety challenges such as anti-social behaviour (ASB) and more recently vehicles being driven dangerously in the car park.

3.3. A community consultation was carried out in September 2025 the results of which are attached to this report. As a result, the community safety team has worked with partners and stakeholders to find a mutually beneficial/workable solution.

3.4. The aim is to create a one-way system using flow plates and securing the main gate in the evening, this will benefit residents as well as other stakeholders needing to use or access the car park.

4. Body of report and reason for recommendations

4.1. Local residents have raised several issues with both the local authority and Police that include ASB in the evenings, speeding vehicles and drug use.

4.2. The initial proposal of installing gates was not an option local stakeholders felt would be workable. This was due to the difficulties of securing this area of the car park when cars we left unattended or refused to leave.

4.3. This revised proposal addresses this issue. Once the car park is full in the evenings by securing the main gate and with the flow plates installed vehicles will not be able to enter the car park via the exit point (adjacent to cadets building) as they are currently doing. At the same time all those already in the car park will be able to leave easily without the need to open or close additional gates.

4.4. By managing the access and having a one-way system particularly in the evenings to access and exit the car park, it will help address the vehicle related ASB. This will be supported with a formal agreement with local groups to ensure the main gate is secured in order to make this intervention have the maximum impact in benefitting residents and stakeholders in the immediate area.

4.5. If this option is approved by cabinet, we will move forward with the planned improvements in early Autmn.

5. Financial Implications

5.1. The installation of flow plates plus signage will cost £5,145. This will be funded via external funding including support from Warwickshire County Council councillors grant fund for the ward.

6. Legal Implications

6.1. No specific legal implications have been identified.

7. Equalities implications

7.1. No specific equality implications have been identified.

8. Health implications

8.1. No specific health implications have been identified.

9. Climate and environmental implications

9.1. No direct climate and/or environmental implications have been identified.

10. Section 17 Crime and Disorder Implications

10.1. It is anticipated this improvement will help the Council and its partners to address issues faced by residents throughout the year.

11. Risk management implications

11.1 We will require local organisations to secure the main gate based on events or activities they are delivering via a formal agreement.

12. Human resources implications

12.1. No direct human resource implications have been identified.

13. Options considered and reason for their rejection

13.1 Not doing anything – this has been considered but clearly would lead to a continuation of issues impacting the quality of life of local residents and so is not a viable option.

14. Conclusion

14.1. Based on the extensive work conducted if approved by cabinet this will help address the issues impacting local residents via the intervention outlined.

15. Appendices

15.1. Please note the consultation results cited in this report.

16. Background papers

16.1. Please note there are no additional background papers attached to this report.

17. Report Writer Details:

Officer Job Title: Communities and Community Safety Manager

Officer Name: Abu Malek

Response Breakdown

- **Yes** to gate installation: **20**
- **No** to gate installation: **90**

Summary of Reasoning and Comments

Common Themes Among "Yes" Responses

- **Safety and security**: Many supporters cited concerns about **anti-social behaviour**, including **drug use**, **noise**, and **reckless driving**.
- **Protection for residents**: Several responses emphasized the need to **safeguard nearby homes**, especially those backing onto the car park.
- **Deterrent effect**: Gates were seen as a **visible deterrent** to unwanted activity.
- **Support from local officials**: A few responses came from individuals identifying as **councillors** or **ASB officers**, citing **first-hand experience** with incidents.

Common Themes Among "No" Responses

- **Impact on theatre and community groups**: A dominant concern was the **reduction in parking spaces**, which would negatively affect the **Abbey Theatre**, **Scouts**, **Cadets**, and other local users.
- **Displacement of issues**: Many argued that gates would simply **move anti-social behaviour elsewhere**, not eliminate it.
- **Lack of evidence**: Some respondents questioned the **validity of the problem**, citing **no recorded incidents** or **personal experiences of safety**.
- **Alternative solutions suggested**:
    - **ANPR cameras** and **CCTV**
    - **Improved lighting**
    - **One-way traffic systems with flow plates**
    - **Increased police patrols**
    - **Community engagement and youth programs**

How respondents identified themselves in relation to their support or opposition to the gate installation:

Respondents Who Answered "Yes" (20 total)

- **Local residents**: 18

- **Others** (e.g. facility users, business owners, councillors): 2

Respondents Who Answered "No" (90 total)

- **Local residents**: 38
- **Others**: 52 (e.g. user of the facilities in the area (some Abbey Theatre), local business owner, councillor)
- Among the 90 respondents who answered "No", 26 of them specifically mentioned "Abbey Theatre" in their reasoning or comments.

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 11

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	9th September 2026
Subject:	Council Tax Reduction Scheme 2027/28
Portfolio:	Finance
Responsible Officer:	Assistant Director - Finance
Corporate Plan – Theme:	Your Council
Corporate Plan – Aim:	Ensuring Value for Money for our Taxpayers
Ward Relevance:	All
Public or Private:	Public
Amendment to Budget:	No **Council Tax Related:** Yes

Recommendation to Council/Cabinet/Committee: No

Forward Plan:	Yes
Subject to Call-in:	No

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1. Purpose of report

1.1. To seek approval to undertake a consultation on a proposed change to the Council Tax Reduction Scheme with both the public and the Major Precepting Authorities with effect from 1st April 2027.

2. Recommendations

2.1. That approval is given for an eight-week consultation period with the public and major preceptors on introducing an income-banded working-age scheme from 1st April 2027, with a maximum award of 85%.

2.2. That the consultation proposal will disregard Carer's Allowance, Universal Credit Transitional Protection and Universal Credit Limited Capability for Work and Work-Related Activity elements.

2.3. That the consultation proposal will continue to protect War Pensioners by ignoring any War Pensions or War Disablement pensions in full when calculating the household's income.

2.4. That the scheme will include Exceptional Hardship support within the Council's working-age reduction scheme under section 13A(1)(a) of the Local Government finance Act 1992.

2.5. That the consultation will explain the current and proposed scheme costs, the claimant level effects and the proposed income bands.

2.6. That a further report be presented to Cabinet in December 2026 with the outcomes of the consultation.

2.7. That Cabinet note the reduction of administrative burden as a result of changing to a banded scheme as detailed in the report.

2.8. The report be marked not for call in due to the timescales for consultation and implementation of the scheme as provided for in paragraph 15(f) of the Overview and Scrutiny Procedure Rules in Part 4 of the Constitution.

3. Background

3.1. Each year the Council is required to review its Council Tax Reduction Scheme in accordance with the requirements of the schedule 1A of the Local Government Finance Act 1992 and to either maintain the scheme or replace it.

3.2. Council Tax Reduction (CTR) was introduced from 1 April 2013 when it replaced the Central Government funded Council Tax Benefit regime. From its inception, the funding available to the Council from government has reduced year on year.

3.3. The Council proposes to replace the current working-age means-tested scheme with a simpler income-banded scheme. The proposed maximum award will remain at 85% of Council Tax liability. The pension-age scheme is prescribed by Central Government and is not affected.

3.4. This report sets out the proposed scheme, its estimated costs and the safeguards for affected households. The proposal is intended to reduce the administrative effects of Universal Credit, provide more stable awards and support Council Tax collection.

3.5. Cabinet is asked to approve statutory consultation before any final decision is made by Full Council.

4. Body of report and reason for recommendations

4.1. CTR was introduced by Central Government in April 2013 as a replacement for the Council Tax Benefit scheme administered on behalf of the Department for Work and Pensions (DWP). As part of the introduction, the Government:

- Placed the duty to create a local scheme for Working Age applicants with billing authorities;
- Reduced initial funding by the equivalent of ten per cent from the levels paid through benefit subsidy to authorities under the previous Council Tax Benefit scheme; and
- Prescribed that persons of Pension age would be dealt with under regulations set by Central Government and not the authorities' local scheme

4.2. Funding for the Council Tax Reduction scheme has been amalgamated into other Central Government grants paid to Local Authorities and also within the Business Rates Retention regime. It is now generally accepted that it is not possible to identify the amount of funding actually provided from Central Government sources.

4.3. The current CTR scheme administered by the Council is divided into two schemes, with pension age applicants receiving support under the rules prescribed by Central Government, and the scheme for working age applicants being determined solely by the local authority.

4.4. Pensioners, subject to their income, can receive up to 100% support towards their council tax. The Council has no power to change the level of support provided to pensioners and therefore any changes to the level of CTR can only be made to the working age scheme.

4.5. When CTR was introduced in 2013, for working age applicants, the Council broadly adopted the previous means tested Council Tax Benefit scheme as the basis of awarding support

4.6. Due to the reduction in funding, the Council set the maximum support available to working-age applicants at 85%. Eligible working-age households must therefore pay at least 15% of their Council Tax liability.

4.7. The only other changes made were in line with prescribed requirements (set by Government) and to bring the scheme into line with either Housing Benefit or Universal Credit.

Issues with Current Scheme

4.8. There are several issues with the current scheme that will need addressing if the system is to continue to provide effective support to low-income taxpayers and to provide the service in an efficient manner. The main issues are detailed below.

The need to assist low-income households and assist in the collection of Council Tax

4.9. The Council currently requires all working-age applicants to pay a minimum of 15% of their Council Tax liability. Under the former Council Tax Benefit scheme, many low-income working-age households could receive full support.

4.10. The proposed banded scheme will retain the existing maximum award of 85%, while changing the calculation method to provide clearer and more stable entitlement.

Council Tax Reduction and the roll out of Universal Credit

4.11. The introduction of Universal Credit within the area has, as experienced in all other areas, brought a number of significant challenges to both the administration of CTR and also the collection of Council Tax generally. All Councils have experienced the following:

- The reluctance of Universal Credit claimants to make a prompt claim for Council Tax Reduction leading to a loss in entitlement;
- A high number of Universal Credit changes are received from the Department for Work and Pensions. Under the existing means-test, relatively small changes can alter Council Tax Reduction, require revised bills and instalments, increase administration and adversely affect collection; and
- The increased costs of administration through multiple changes with significant staff time being needed. Consequently, this has resulted in delays in processing CTR claims and sending revised council tax bills.

4.12. The existing means-tested scheme is too reactive to change and is not viable in the longer term now that Universal Credit is fully established and migration from the principal working-age legacy benefits was completed during 2026. Moving to a more efficient scheme from 2027/28 is therefore proposed.

The need for a simplified approach to Council Tax Reduction Scheme

4.13. Notwithstanding the introduction of Universal Credit, the existing scheme is based on an old-fashioned means-tested benefit scheme. It has major defects, namely:

- It is difficult for customers to understand and is based on a complex calculation of entitlement
- The administration for staff is complex, with staff having to request significant amounts of information from applicants; and
- Staff have to undergo significant training to be competent in processing claims, it takes over a year for an assessor to be proficient in the basics.
- The timescales for processing applications is lengthy, mainly due to the complexity and evidence required to support the applications; and
- The administration of the scheme is costly when compared to other discounts for Council Tax

4.14. A full review our CTR scheme, not only to mitigate the effects of Universal Credit, but also make it easier for customers to make a claim and to significantly reduce the time and costs of administration so work demands are more manageable on the team is now proposed.

Proposed Approach for 2027/28 Council Tax Reduction Scheme

4.15. In view of the problems being experienced with the current scheme, it is proposed that an alternative approach be taken from 2027/28. The approach is to fundamentally redesign the scheme to address all of the issues with the current scheme and in particular:

- To maintain the level of support available to the poorest households;
- To address the problems with the introduction of full-service Universal Credit; and
- To reduce the administration costs and delays in processing due to the high level of changes received in respect of Universal Credit;

4.16. Work has been undertaken during 2026 to design and model a proposed scheme. Subject to Cabinet approval, consultation will be undertaken with the public and the major precepting authorities.

4.17. A further report will present the responses, final modelling and Equality Impact Assessment before Full Council determines the scheme for 2027/28.

4.18. The current working-age means-tested scheme will be replaced by a simple income-grid model, as shown below:

		Single	Single + 1 child	Single + 2+ children	Couple	Couple + 1 child	Couple + 2+ children
Discount level	Weekly Income Levels £						
Band 1* 85%		£0.00 to £125.00	£0.00 to £225.00	£0.00 to £325	£0.00 to £175.00	£0.00 to £225.00	£0.00 to £325.00
Band 2 75%		£125.01 to £175.00	£225.01 to £275.00	£325.01 to £375.00	£175.01 to £225.00	£225.01 to £275.00	£325.01 to £375.00
Band 3 50%		£175.01 to £225.00	£275.01 to £325.00	£375.01 to £425.00	£225.01 to £275.00	£275.01 to £325.00	£375.01 to £425.00
Band 4 25%		£225.01 to £275.00	£325.01 to £375.00	£425.01 to £475.00	£275.01 to £325.00	£325.01 to £375.00	£425.01 to £475.00

4.19. Band 1 will provide the maximum award of 85% of eligible Council Tax liability. Applicants receiving a relevant passported benefit and other applicants whose assessed income falls within Band 1 will receive the maximum award.

4.20. All other discount levels are based on the applicant's and partner's, (where they have one) net income.

4.21. The scheme allows for variation in household size with the levels of income per band increasing where an applicant has a partner, and / or dependants.

4.22. The scheme will have the following key features:

- To encourage work, a standard £25 per week disregard will be provided against all earnings This will take the place of the current standard disregards and additional earnings disregards. Where a family also receives a childcare disregard (for childcare costs not paid for by Central Government schemes), the income levels in the 'grid scheme' are set at a higher rate;
- The non-dependant deduction will remain in line with the Council Tax Prescribed Regulations;
- Disability benefits such as Disability Living Allowance and Personal Independence Payment will continue to be disregarded;
- Where any applicant, their partner or any dependent child(ren) are disabled, a further disregard of £50 per week will be given, thereby maintaining the current level of support to those with disabilities;
- Carer's Allowance and the support component of income-related Employment and Support Allowance will be fully disregarded;
- Child benefit and Child Maintenance will be disregarded;
- The following Universal Credit elements will be removed from the assessed Universal Credit income and fully disregarded:
    - the Housing Costs Element and Childcare Costs Element;
    - the Limited Capability for Work and Work-Related Activity (LCWRA) Element;
    - the Carer Element; and
    - the Disabled Child Element

- The total disregard on war pensions and war disablement pensions will continue (maintaining the Council's commitment to the Armed Forces Community Covenant);
- Extended payments will be removed from the new scheme; and
- The capital limit will be £6,000 but with no tariff (or assumed income) being applied.

Addressing the problems with the current Council Tax Reduction Scheme

4.23. With the simplicity of the proposed new scheme and by taking a more 'Council Tax discount approach', it will address the problems associated with the increased administration and delays in processing caused by failings in the current scheme and Universal Credit as follows:

4.24. The scheme will require a simplified claiming process. All applicants will see a significant reduction in the claiming process and, where possible, CTR will be awarded automatically.

4.25. For Universal Credit applicants any Universal Credit data received from the Department for Work and Pensions (DWP) will be treated as a claim for CTR. Where information is received from DWP, the entitlement to CTR will be processed automatically without the need to request further information from the council taxpayer.

4.26. These changes will have the following distinct advantages namely:

- **Speed of processing –** all claims will be able to be calculated promptly and largely automatically without the need to request further information which inevitably leads to delays;
- **Maximising entitlement to every applicant**. The claiming process will be simplified significantly for all CTR claimants. Entitlement to CTR will be maximised with a reduced risk of loss of discount or the need for backdating;
- **Maintenance of collection rates** – the new scheme will avoid constant changes in discount, the need for multiple changes in instalments and therefore assist in improving and increasing collection rates. The maintained maximum level of discount will also assist all those applicants on

the lowest levels of income, again improving the overall collection rate;

- The income bands are sufficiently wide to avoid constant changes in discount. The current CTR scheme is very reactive and will alter even if the overall change to the person's liability is small. This is leading to constant changes in Council Tax liability, the need to recalculate monthly instalments and the requirement to issue a large number of Council Tax bills. The effect of this is that Council Tax collection is reduced. The new scheme, with its simplified income banding approach will have the following advantages:
- Only significant changes in income will affect the level of discount awarded;
- Council Taxpayers who receive Council Tax Reduction will not receive multiple Council Tax demands and adjustments to their instalments; and
- The new scheme is designed to reflect a more modern approach, where any discount changes it will be effective from the day of the change rather than the Monday of the following week.

Effect on individual households

4.27. The proposed change may affect households differently even though the maximum award remains 85%. Claimant-level modelling will identify the estimated number of households that increase, decrease or remain unchanged, the scale of each change and the effects on relevant groups.

Outcome	**Estimated households**
Increase	699 (11.40%)
Stay the same	4669 (76.13%)
Decrease	765 (12.47%)

4.28. Any scheme redesign is likely to create both increases and decreases in household eligibility. The proposed disregards, and household income thresholds are intended to protect low-income and vulnerable households, but the modelling and consultation evidence must be considered before the final decision.

4.29. To assist households that experience exceptional hardship, the new working-age scheme will include an Exceptional Hardship provision under section 13A(1)(a) of the Local Government Finance Act 1992. Applicants who may be unable to meet the remaining Council Tax liability will be encouraged and, where appropriate, proactively invited to apply.

4.30. Exceptional Hardship applications will be considered individually, taking account of income, essential expenditure, vulnerability, disability, caring responsibilities and the extent of any reduction in entitlement.

4.31. Awards will form part of the Council's section 13A(1)(a) scheme and will be met through the Collection Fund. The final report will set out the proposed budget, decision criteria, review arrangements and monitoring

5. Consultation with the public, members, officers and associated stakeholders

5.1. There is a legal requirement for the authority to consult with both Major Preceptors and the public prior to adopting any new scheme and therefore approval is requested to commence that process.

5.2. We will encourage customers to have their say via the online dedicated consultation webpage, we will also offer in person appointments for anyone who wishes to discuss how these changes affect them. These appointments will run Monday to Friday for five weeks of the eight-week consultation period.

5.3. It should be noted that the final decision on any scheme will have to be made by Full Council taking into account the results of the consultation.

6. Financial Implications

6.1. The proposed maximum award remains 85%, but the annual scheme cost may change because of the income bands, and the additional income disregards. The consultation must therefore show the current cost, proposed cost and estimated change on a consistent modelling basis.

6.2. The cost assessment will use the latest validated working-age caseload, current Council Tax liability and the proposed 2027/28 parameters. It will also identify implementation and software costs and the proposed Exceptional Hardship budget.

6.3. Savings will be made initially from the print and postage costs of issuing repeated new award letters and Council Tax Bills and we would expect to see a reduction in complaints from customers who are issued revised bills multiple times per year.

6.4. The estimated cost summary for working-age customers for consultation is set out below:

Cost item	**Amount / modelling result**
Current annual working-age scheme cost	£7,101,237.31
Proposed annual 85% banded-scheme cost	£7,235,904.53
Annual increase / (reduction)	**£134,667.22**
Proposed Exceptional Hardship budget under section 13A(1)(a)	£30,000

Current Cost and Estimated Costs
Working age (£7,101,237.31)
Pension Age (£4,203,059.40)
**data as of 21/06/2026*

6.5. The split between major preceptors is set out below:

85%	Split %	Current	Proposed	Increase
Nuneaton and Bedworth Borough Council	11.17	£1,262,689.94	£1,277,732.27	£15,042.33
Warwickshire County Council	76.09	£8,601,439.37	£8,703,907.65	£102,468.28
Police and Crime Commissioner	12.74	£1,440,167.40	£1,457,324.00	£17,156.60
	100%	**£11,304,296.71**	**£11,438,963.93**	**£134,667.22**

7. Legal Implications

7.1. Schedule 1A (3) of the Local Government Finance Act 1992, states that before making a scheme, the authority must:

- consult any major precepting authority which has power to issue a precept to it,
- publish a draft scheme in such manner as it thinks fit, and
- consult such other persons as it considers are likely to have an interest in the operation of the scheme.

7.2. Following consultation, the final working-age scheme must be made by Full Council no later than 11th March 2027 for it to take effect on 1st April 2027.

8. Equalities implications

8.1. A full Equality Impact Assessment will be completed once the consultation concludes.

9. Health implications

9.1. No specific health implications have been identified following the completion of an impact assessment.

10. Climate and environmental implications

10.1. No direct climate and/or environmental implications have been identified.

11. Section 17 Crime and Disorder Implications

11.1. No direct Section 17 crime and disorder implications have been identified.

12. Risk management implications

12.1. The following risk management implications have been identified:

i. Inaccurate modelling of financial impact

ii. Inadequate consultation undertaken
iii. Unidentified equality impacts
iv. System implementation failure
v. Hardship for households that lose support

12.2. It is proposed to mitigate the above by implementing the following mitigations:

i. Independent validation of the financial modelling
ii. A lawful and fully accessible consultation
iii. A full Equality Impact Assessment
iv. System testing
v. Staff training
vi. Targeted Exceptional Hardship Support

13. Human resources implications

13.1. No direct human resource implications have been identified.

14. Biodiversity Implications

14.1. No direct biodiversity implications have been identified.

15. Local Government Reorganisation (LGR) Implications

15.1. If the recommendations are approved, the decisions will bring the following benefits from a LGR perspective:

i. It will move the authority towards a simpler banded approach and may assist future harmonisation discussions with neighbouring Warwickshire authorities
ii. It will provide a clear basis for comparing scheme parameters and claimant impacts across any future unitary area; and
iii. It will reduce scheme complexity ahead of any future integration, while recognising that harmonisation decisions would be for the future unitary authority.

16. Options considered and reason for their rejection

16.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	Keep the current inefficient, complicated scheme in place

17. Conclusion

17.1. The proposed income-banded scheme will retain the Council's existing maximum award of 85% while simplifying administration and providing clearer, more stable support.

17.2. Cabinet is asked only to approve consultation at this stage. The consultation responses, validated costs and claimant impacts, final Equality Impact Assessment and detailed section 13A(1)(a) scheme will be reported before Full Council makes the final decision.

18. Appendices

18.1. Please note there are no appendices attached to this report.

19. Background papers

19.1. Please note the following background papers:

i. Review of the Council Tax Reduction Scheme – Cabinet, January 2026

20. Report Writer Details:

Officer Job Title: Head of Revenues and Benefits

Officer Name: Katie Hines

AGENDA ITEM NO. 12

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	9 September 2026
Subject:	Houses in Multiple Occupation (HMO) - Introduction of Additional HMO Licensing and Selective Licensing, current position and next steps regarding introducing an Article 4 direction
Portfolio:	Planning, Enforcement and Public Services.
Responsible Officer:	Assistant Director – Environment and Enforcement and Assistant Director – Planning.
Corporate Plan – Theme:	Housing, Health and Communities and Green Spaces and Environment
Corporate Plan – Aim:	All
Ward Relevance:	All
Public or Private:	Public
Amendment to Budget:	Not at this stage (see section 7)
Council Tax Related:	No
Recommendation to Council:	No
Forward Plan:	Yes
Subject to Call-in:	Yes

1.0 Purpose of report

1.1 The purpose of this report is to provide an update and seek approval for measures in relation to the management of Houses in Multiple Occupation (HMOs) within the Borough.

1.2 The report presents the findings of an independent evidence-based assessment of HMOs within the Borough prepared by DLP Planning Consultants (Appendix A). The assessment considered whether the introduction of an Article 4 Direction, restricting permitted development rights for HMOs, could currently be justified in accordance with national planning policy.

1.3 This report sets out the Council's response to those initial findings, including seeking approval for further evidence gathering and monitoring activity, together with delegated approval to ensure that further work can be resourced.

1.4 This report seeks approval to progress the three evidence gathering steps set out at paragraph 4.7, together with the further measures at recommendations 2.4 to 2.7.

2.0 Recommendations

2.1 Cabinet notes that an Article 4 Direction would apply only to future changes of use and would have no effect on properties already operating as HMOs within the Borough.

2.2 Cabinet notes the findings of the HMO evidence-based study undertaken by DLP Consultants (Appendix A). The study concludes that, based on the evidence currently available, there is unlikely to be sufficient justification for the introduction of an Article 4 Direction in accordance with national planning policy.

2.3 Notwithstanding recommendation 2.2, Cabinet records its view that HMO concentrations and associated management issues are causing adverse impacts in parts of the Borough and therefore instructs the following work to be undertaken:

i. Consolidation of Council held data relating to HMOs.

ii. A partner-led data collection and evidence gathering exercise.

iii. Ongoing monitoring of HMO numbers, complaints and amenity impacts.

iv. Undertaking of a non-statutory public survey by way of a questionnaire, which is separate from and does not form part of the statutory consultation required for licensing designation, with delegated authority to the Assistant Director for Environment and Enforcement, in consultation with the Portfolio Holder for Planning, Enforcement and Public Services and the Monitoring Officer, to determine the questions and to approve the final questionnaire prior to launch.

v. A further report to Cabinet setting out whether sufficient robust evidence exists to justify the introduction of an Article 4 Direction.

vi. Delegated authority to the Assistant Director for Digital and Business Change to enter into the information sharing agreement and agreed methodology required for the partner led exercise at 2.3(ii).

2.4 Cabinet approves a capped spend envelope of up to £40,000 for the non-statutory survey and the evidence gathering at recommendation 2.3 from existing budget provisions.

2.5 Cabinet approves in principle the introduction of additional HMO licensing under section 56 and selective licensing under section 80 of the Housing Act 2004, subject to the outcome of the statutory consultation and instructs officers to bring forward the designation report accordingly, subject to the required budget provisions being identified.

2.6 Cabinet agrees that the Leader will act as the political lead for the programme of work as a whole, including the introduction of licensing, the further Article 4 evidence work and the representations to Government, supported by the Portfolio Holder for Planning, Enforcement and Public Services, and will act as the Council’s spokesperson on it.

2.7 Cabinet notes that neither licensing nor an Article 4 Direction gives the Council a presence in the areas concerned before 2028, and asks officers to develop, for consideration alongside the further report at recommendation 2.3(v), an option for a community presence and engagement function in the areas of highest

HMO concentration, together with its indicative cost and the funding routes available.

3.0 Background

Definition of Houses in Multiple Occupation

3.1 A HMO is generally defined as a property rented out by three or more people, not from the same household, living together and sharing basic amenities such as a kitchen or bathroom.

3.2 For planning purposes, HMOs are classified under the Town and Country Planning (Use Classes) Order 1987 (as amended) as:

- Use Class C4 – accommodating between three and six unrelated individuals,

- Sui Generis – accommodating seven or more unrelated individuals.

A typical family dwelling (house or flat) is classified as Use Class C3.

3.3 At present, the change of use of a dwellinghouse from Use Class C3 to a C4 HMO (3-6 people) is permitted development and therefore does not require planning permission. Planning permission is, however, required for the conversion of a Use Class C3 house to a large HMO (Sui Generis) accommodating more than six people.

Article 4 Directions

3.4 Local authorities may introduce an Article 4 Direction to remove certain permitted development rights. Where such a Direction is in force, planning permission must be obtained for development that would otherwise be permitted automatically under national planning legislation.

3.5 The updated National Planning Policy Framework (NPPF) was published on 17 August 2026. Policy DM10 makes it clear that Article 4 Directions should be limited to situations where it is necessary to protect local amenity or the wellbeing of the area, be based on robust evidence and cover the smallest area required to mitigate the evidenced harm. Therefore, in accordance with both the updated NPPF, and previous NPPF (December 2024), introducing an Article 4 Direction is a significant intervention which must be clearly justified and based on robust evidence.

3.6 There are two types of Article 4 Directions: immediate and non-immediate.

3.7 An immediate Direction can withdraw permitted development rights straight away. The circumstances where immediate Directions can be made are limited to where permitted development rights present an immediate threat to local amenity; for example if there is ongoing public disorder or where there may be prejudice to the proper planning of an area. Under the immediate route, the local authority is exposed to compensation.

3.8 A non-immediate Article 4 Direction, unlike an immediate one, does not take effect immediately. It allows for a period of time, often 12 months, between the Direction being made and when it comes into force. In the case of a non-immediate Direction, the Council must first make the Direction and then give notice of its making. The Direction must contain a date upon which it is to come into force. On the making of a Direction the Council must consult with the public before deciding on whether to confirm the Direction.

3.9 Members expressed an interest in exploring whether an Article 4 Direction relating to HMOs could be justified within the Borough. Should the Council decide to pursue this course of action, Officers would recommend a non-immediate Direction in order to avoid potential compensation liabilities and allow sufficient time for consultation and stakeholder engagement.

3.10 To determine whether an Article 4 Direction could be justified in accordance with national planning policy, DLP Consultants were commissioned to assess the growth, distribution and impacts of HMOs across the Borough. The report sought to provide a clear, evidence-based recommendation on whether the introduction of an Article 4 Direction is justified, and if so, the appropriate scope and geographical coverage of any designation. The findings of the report are summarised in Section 4 and are set out in full in Appendix A.

Limitations of Article 4 Directions

3.11 Notwithstanding the findings and recommendations of the DLP report, an Article 4 Direction would only apply to future changes of use. It would not affect HMOs in existence within the Borough, including properties in use as dispersed asylum accommodation. An Article 4 Direction is therefore a mechanism for controlling the creation of new small HMOs rather than addressing existing concentrations or management issues.

3.12 An Article 4 Direction also gives the Council no control over who occupies a property. It simply removes permitted development rights and therefore requires a planning application to be made for the change of use. These planning applications then have to be considered against the provisions of the development plan, and unless there are significant adverse material planning considerations these applications would be expected to be approved. The demographics of individuals occupying any future HMOs is not a material planning consideration.

3.13 Unlike an Article 4 Direction, licensing reaches every property within a designation from the day the scheme takes effect.

Licensing of HMOs within NBBC

3.14 The private rented sector accounts for approximately 17% of households in the Borough at the 2021 census. The Council licenses 117 HMOs under the mandatory scheme. HMOs occupied by three or four people fall outside that scheme, and there is no statutory requirement for them to be registered or notified, so no authority holds a complete list of them. Licence conditions bearing on management, fire, gas and electrical safety and waste storage therefore apply only to the mandatory stock.

4.0 Body of report and reason for recommendations

Article 4 Direction

4.1 Policy DM10 of the NPPF states that Article 4 Directions should be limited to situations where it is necessary to protect local amenity or the wellbeing of the area, to cover the smallest area required to mitigate the evidenced harm and to be based on robust evidence.

4.2 The report prepared by DLP Consultants (Appendix A) considered the distribution and concentration of HMOs across the Borough, the extent of any amenity impacts associated with HMOs, and whether the available evidence demonstrated sufficient justification for removing permitted development rights through the introduction of an Article 4 Direction.

4.3 The report makes the following recommendations and draws the following conclusions:

i) Monitoring and Evidence Base Development - establish a clear framework for monitoring HMO growth and review the initial findings of the study to inform future policy development.

ii) Licensing Options – consider an additional licensing scheme or a selective licensing scheme targeted at areas with the highest concentrations of HMOs as covered in the report.

iii) Permitted Development Rights – the removal of permitted development rights through an Article 4 Direction on the grounds of an overconcentration of HMOs is unlikely to be warranted at the current time.

iv) Local Plan Policy Development – explore an amenity-based policy approach towards HMOs as part of the new Local Plan, with the option of stronger measures only if further monitoring demonstrates a clearer need.

4.4 In summary, the report concludes that, having regard to the evidence currently available and the requirements of national planning policy, there is insufficient robust evidence to justify the introduction of an Article 4 Direction at this time.

4.5 Accordingly, Officers advise that the introduction of either an immediate or non-immediate Article 4 Direction based on the evidence currently available would expose the Council to a significant risk of legal challenge and would not be consistent with national planning policy requirements.

Further Evidence Gathering

4.6 Members have expressed concerns that the impacts experienced by residents may not be fully reflected within the datasets currently available. It is considered that this proposition is capable of being tested through further evidence gathering and monitoring.

4.7 The data required to determine whether an Article 4 Direction is justified is not held in one location. It is dispersed across a range of Council systems and external partner organisations. Therefore, approval is sought to produce this data in accordance with the three steps identified below.

i) Consolidation of the data the Council already holds, building upon the data sources analysed by DLP: reconciliation of planning, council tax, benefits, licensing, waste and complaint records to produce a single HMO baseline mapped to street level, and recoding of service requests and anti-social behaviour reports so that they can be attributed to property type.

ii) A partner led exercise to obtain the data the Council does not hold. Warwickshire Police hold incident and crime data at address level; Warwickshire County Council hold highways, parking, school admissions and public health data; the fire and rescue service hold incident and risk data on multiple occupied premises; registered providers, the Home Office and its accommodation contractor hold occupancy information; and neighbouring districts hold evidence of displacement across boundaries. No single one of these bodies can evidence the position and the Council cannot evidence it alone. A data sharing arrangement and a jointly agreed methodology will be required, and Officers will approach partners through the Community Safety Partnership and the Warwickshire chief officer arrangements, with delegated authority to the Assistant Director for Digital and Business Change to enter into the information sharing agreement, as set out at recommendation 2.3(vi).

iii) An amenity impact assessment for the wards where concentrations are shown to be highest, once the baseline exists.

The licensing scheme at recommendation 2.5 contributes directly to all three, since applications produce the address list and inspections produce the condition data, so the licensing decision materially strengthens any future Article 4 case.

4.8 Members should note that public support for a Direction is not in itself the robust evidence that national policy requires. The non-statutory survey will provide evidence of perceived amenity impact, which will need to be corroborated by the data described above. A high level of public support would not, without that corroboration, allow a Direction to be made.

4.9 The work outlined above will require additional resources. Recommendation 2.4 therefore seeks approval of a capped envelope of up to £40,000, to be met from existing budget provision, and the associated officer time will be managed through reprioritisation within the service.

5.0 Licensing

5.1 Unlike an Article 4 Direction, which only controls future changes of use, licensing is the intervention that reaches the existing private rented stock. It places the burden of demonstrating compliance on the landlord rather than the burden of complaint on the tenant, provides a complete address list of the regulated stock, applies a fit and proper person test, and imposes conditions covering management, fire, gas and electrical safety, waste storage, an out of hours contact and the landlord’s obligation to act on anti-social behaviour by occupiers.

5.2 Additional licensing under section 56 of the Housing Act 2004 extends licensing to HMOs below the mandatory threshold. Selective licensing under section 80 extends it to other privately rented homes in a designated area where one or more statutory conditions are met, including a significant and persistent problem caused by anti-social behaviour where landlords are failing to act, poor property conditions, deprivation, migration or crime.

5.3 The two designations do different things and are not interchangeable. Additional licensing under section 56 is the measure that reaches the small HMOs themselves, being the three and four person properties which fall outside the mandatory scheme. Properties licensed or licensable under Part 2 are generally excluded from a selective licensing designation, so a selective scheme would reach the non-HMO privately rented stock in the streets around those HMOs rather than the HMOs. Both are proposed because the concerns raised by Members relate to the HMO stock and to the wider private rented sector in the same areas, and neither designation on its own would reach both.

5.4 The statutory condition on which a selective designation in the Borough is most likely to rest is that at section 80(6) of the Housing Act 2004, being anti-social behaviour connected to the use and management of privately rented property rather than poor property conditions. That condition requires the Council to satisfy three tests: that the area is experiencing a significant and persistent problem caused by anti-social behaviour; that some or all of the private sector landlords who have let premises in the area are failing to take action to combat it that it would be appropriate for them to take; and that the designation, combined with other measures taken by the Council or by others with it, will lead to a reduction in or the elimination of the problem.

5.5 The evidence required for that condition differs from the evidence required for a condition based on housing conditions, and a stock condition survey would not evidence any of the three tests. What is required is police and anti-social behaviour case data, complaint records mapped to property level, HMO concentration mapping, and the Council's own enforcement correspondence showing landlords contacted and not acting. That material is less expensive to commission than a stock condition survey but makes heavier demands on officer time. The evidence gathering at recommendation 2.3 is designed to produce it and serves the Article 4 question and the licensing question together.

5.6 Members should note that the test is a significant and persistent problem. Individual incidents, however serious, and the strength of local feeling are properly part of the narrative, but neither will carry a designation on its own. A designation must rest on sustained, property-linked data, and one which reads as a response to a single event is more vulnerable to challenge rather than less. Should the partner data show high levels of crime rather than persistent anti-social behaviour, the crime condition under the Selective Licensing of Houses (Additional Conditions) (England) Order 2015 provides an alternative ground drawing on the same data sources.

5.7 Since the General Approval of 23 December 2024, no Secretary of State confirmation is required for a selective licensing designation of any size. The evidential requirements are unchanged, and the Council carries them in full: each statutory condition relied upon must be evidenced for the specific area designated, and fees must be set on a cost recovery basis, split between application and scheme management components. The practical effect is that the evidence base is tested by the Administrative Court on a challenge rather than by the department before designation, which places a premium on its quality.

5.8 The statutory process requires a consultation of not less than ten weeks on the specific proposed designations before the designation decision is taken, and a designation cannot come into force earlier than three months after it is made. Recommendation 2.5 therefore approves the introduction of licensing in principle and instructs officers to take the scheme through that process, with the designation report returning to Cabinet. Cabinet's support at this stage is a predisposition, which is lawful; the designation decision itself will be taken at the further report with an open mind on the responses received. The non-statutory survey does not count towards that period. A statutory consultation which is not run for the full period cannot be relied upon at all: one district authority halted a consultation seven weeks into eleven and was unable to use any part of it towards a formal designation because the required period had not taken place. The statutory stage is therefore all or nothing, which is the reason the approvals are staged as set out at paragraph 5.20 rather than sought in full at this meeting.

Community presence and engagement

5.9 Members have raised concerns about the safety and confidence of residents in the parts of the Borough where houses in multiple occupation, including accommodation used for asylum dispersal, are most concentrated. Officers recognise the strength of feeling and its effect on how residents in the areas concerned regard their neighbourhoods.

5.10 It is important that Members are clear about what is and is not within the Council's power. The Council has no power to determine who is placed in dispersed asylum accommodation, to require any person to be moved out of the Borough, or to prevent further placements. Those decisions rest with the Home Office and its accommodation contractor. Neither licensing nor an Article 4 Direction alters that position, and no option in this report does so. What the Council is able to influence is how the areas concerned are managed: how visible its own presence is, how quickly low level problems are identified and reported, how effectively the bodies responsible for the accommodation are held to their obligations, and whether structured daytime activity is available to occupants who are not permitted to work.

5.11 The last of those points is relevant to what residents describe. Adults accommodated under the dispersal arrangements are generally not permitted to work while their claims are determined, receive a small weekly allowance, and are placed in shared housing with little structured activity available to them. Any group of adults accommodated on those terms will spend a large part of the day in the streets and public spaces around their accommodation, and that presence is experienced by some residents as a change in the character of the area. The approach taken in other dispersal areas has been to address the presence and the concern together, through a visible and approachable authority presence, a route by which conduct concerns reach the bodies with the contractual means to act on them, and structured daytime activity delivered through the voluntary sector.

5.12 Three ways of delivering such a function have been identified at this stage.

5.12.1 Community wardens directly employed by the Council. A team of uniformed officers deployed to the wards where concentrations are shown to be highest, on a patrol pattern weighted to the times and locations residents report concerns. The functions would be a visible reassurance presence; first line response to environmental and low level anti-social behaviour matters within the Council's own powers, including waste presentation, fly tipping, noise and any conduct covered by a public spaces protection order; reporting of conduct concerns at accommodation addresses to the contractor and to the Home Office; recording of incidents mapped to address, which would feed directly into the evidence base at recommendation 2.3; signposting of occupants to voluntary sector activity; and regular contact with ward councillors, residents' groups and the neighbourhood policing team. Wardens would not hold police powers and could not stop, search, detain or direct any person to leave an area.

5.12.2 Purchased police or police community support officer hours. Dedicated patrol time in the areas concerned, purchased from Warwickshire Police through the Community Safety Partnership. The officers would hold powers which wardens do not, but operational control would remain with the police, purchased hours are vulnerable to abstraction, the hourly cost is higher, and the arrangement would provide none of the environmental, recording or referral functions described above.

5.12.3 Contractor and partner led provision. The Council would not deploy its own staff but would use the Community Safety Partnership and the Home Office's regional arrangements to seek an increased frequency of housing officer and welfare visits by the accommodation contractor, a regular tasking arrangement between the neighbourhood policing team, the contractor and the Council for the areas concerned, and voluntary sector provision of English language classes, volunteering placements, sport and other structured activity. This option is at nil or low cost to the Council, but its delivery would rest with other bodies and the Council would have no presence of its own.

5.13 Officers' preliminary view, offered without prejudice to the work at recommendation 2.7, is that the first and third options would work best together. A warden function would give the Council a presence in the areas concerned which no partner will provide on its behalf and would generate address level information of direct value to the evidence base at recommendation 2.3 and to any future designation. The partner strand addresses the absence of provision which a warden function alone cannot. The second option is not put forward as a substitute for either but could be used alongside them for defined periods if the Community Safety Partnership considered it necessary.

5.14 Members should note the relationship between this work and the contractual arrangements for dispersed accommodation. Officers understand that the Home Office accommodation contracts contain provisions relating to the conduct of service users and to the frequency of welfare and property visits by the contractor, and that the Home Office may relocate a service user in defined circumstances. A properly recorded reporting route from the Council to the contractor and the Home Office is therefore the means by which individual conduct concerns can be acted upon. It operates by reference to evidence of individual conduct and not by reference to who a person is, and it is the only lawful route by which any occupant's placement in the Borough can be affected.

5.15 Any deployment would be determined by area and by incident data, in the same way as the licensing designations. A function directed at a group of people by reference to their nationality, immigration status or ethnicity would be unlawful under the Equality Act 2010 and would cut across the duty to foster good relations at section 149. The equality impact assessment at Appendix B would be extended accordingly, and communications should describe any function by reference to the areas served and the services provided.

5.16 No cost or funding approval is sought at this meeting. The work is not within the capped envelope at recommendation 2.4 and could not be met from licence fee income.

<u>Dispersed asylum accommodation</u>

5.17 Accommodation is procured by the Home Office through its contractor Serco. There are understood to be 64 properties in the Borough 61 HMO's. The Council is consulted but has no veto, is not notified when properties enter or leave use, and, because most such properties fall within Class C4, has no planning trigger.

<u>Representations to Government</u>

5.18 The procurement arrangements are not within the Council's control. Representations carry no evidential threshold and are unaffected by the advice on Article 4. The matters which only Government is able to address are:

a. local authority agreement, not mere consultation, before dispersed accommodation is procured in a district;

b. address level notification when properties enter or leave use;

c. a ward level cap on concentration;

d. national removal of the C3 to C4 permitted development right;

e. a funded new burdens settlement for district services; and

f. confirmation that no further licensing exemption will be made.

5.19 The Asylum Accommodation and Support Contracts run to 2029 and contain a break clause exercisable by the Home Office from March 2026. That right has not to date been exercised and representations made now are therefore capable of informing any decision to renegotiate or to terminate. Officers recommend that any representations, the Cabinet debate and any associated communications are confined to those grounds. Framing directed at the occupants of the accommodation rather than at the arrangements for it would engage the duty at section 149 of the Equality Act 2010, which is addressed at paragraph 5.15 and in the equality impact assessment at Appendix B.

Programme and decision points

5.20 The programme is set out in the table below. Cabinet is asked at this meeting to approve stages 1 to 3 only. Stages 4 and 7 are separate decisions of Cabinet, and any budget amendment associated with stage 7 would fall to Full Council. All timings are indicative and subject to approval at each stage.

Stage	Activity	Indicative timing	Member decision	Indicative cost
1	This report: approve the capped envelope for the non-statutory survey and the evidence base	September 2026	Yes	Approval only

Stage	Activity	Indicative timing	Member decision	Indicative cost
2	Non-statutory survey (6 weeks)	October to November 2026	No	With and capped to the existing budget of £40,000
3	Anti-social behaviour, crime and HMO evidence base assembled; counsel's opinion on the section 80(6) tests	November 2026 to February 2027	No	With and capped to the existing budget of £40,000
4	Cabinet: approve the draft designations and authorise the statutory consultation	March 2027	Yes	To be approved at a later date
5	Statutory consultation, minimum ten weeks, proposed to run for twelve weeks	April to June 2027	No	To be approved through the 2027/28 budget setting process - £100,000 to £130,000 for a targeted designation; up to £235,000 borough-wide (paragraph 7.3)
6	Analysis of representations and consultation report	July to August 2027	No	Included in stage 5
7	Cabinet: decide whether to designate, approve the fee model and the budget amendment (Full Council)	September 2027	Yes	To be approved at a later date
8	Designations published, three-month lead-in for landlords to apply	October to December 2027	No	To be approved through the 2027/28 budget setting process - Mobilisation from forward funding, indicatively £75,000 to £150,000, repayable from fee income (paragraph 7.8)
9	Schemes go live, applications open, fee income begins	January 2028	No	TBC

5.21 The approvals are deliberately staged. The greater part of the cost sits at stage 5, and there is no advantage to the Council in committing to it before the evidence assembled at stage 3 has been tested. Members should also note that a scheme reaching go-live in January 2028 would do so shortly before the new unitary authority is due to vest on 1 April 2028, and that a five-year designation made in 2027 would transfer to the successor authority.

6.0 Consultation with the public, members, officers and associated stakeholders

6.1 Internal consultation has been undertaken with Legal Services, Finance, Planning, Community Safety and Communications.

6.2 The statutory consultation of not less than ten weeks on the specific proposed designations will be undertaken as part of the process at recommendation 2.5, using a separate document addressed to the designations proposed rather than the non-statutory questionnaire. Consultees will include tenants, landlords, agents, landlord representative bodies, businesses, neighbouring authorities, registered providers, advice agencies, ward councillors and the Communities, Corporate Resources and Housing Overview and Scrutiny Panel.

6.3 The non-statutory survey is an exercise undertaken to inform the evidence base and the design of the schemes. It does not discharge the statutory consultation duty and is not relied upon for that purpose.

7.0 Financial Implications

7.1 The costs of this work fall into three parts: assembling the evidence base, the statutory consultation which must precede any designation, and running a scheme once designated. Only the first is sought at this meeting. Any licensing scheme must be self-financing. Fees must be set on a cost recovery basis in accordance with the principles established in R (Hemming) v Westminster City Council, separated into an application component and a scheme management component, and may not be set so as to generate a surplus. A full financial model, including staffing costs and take-up assumptions, will accompany the designation report.

7.2 Pre-designation costs. The non-statutory survey can be run in-house at a cost in the low thousands. The anti-social behaviour, crime and HMO evidence base, along with counsel's opinion on whether the section 80(6) evidence is capable of supporting a designation will be capped at £40,000. Officers advise that the opinion should not be omitted. The second of the three tests, that landlords are failing to act, is the one at which any challenge would be directed and the one which the Council's own records must carry. This excludes officer time, which is addressed at section 14. Should analytical capacity need to be bought in rather than found, it would be met from within the envelope or reported.

7.3 The statutory consultation. Cost at that stage is driven by the scale of the designation rather than by the statutory condition relied upon. It is proposed that the consultation is delivered independently, with the fixed element covering an independent evidence report, design of the consultation, landlord and tenant events, direct notification of every property in the proposed area, an online response platform, and independent analysis and the consultation report. Independent delivery is proposed because a designation must withstand challenge on the adequacy of the consultation as well as on the evidence. Published comparators fit a fixed core of £90,000 to £110,000 plus approximately £8 to £12 per property in the designated area. On that basis a targeted designation covering two or three wards, at around 1,500 properties, is estimated at £100,000 to £130,000; a designation of around 4,000 properties at £120,000 to £160,000; and a borough-wide designation at £175,000 to £235,000, measured against approximately 10,500 privately rented properties, being the 9,399 privately rented households recorded at the 2021 census uplifted for growth since. The number of privately rented properties in the areas which may be proposed is not yet known and will follow from the evidence gathering at recommendation 2.3. These ranges will be reduced to a single figure in the designation report.

7.4 Members should note that published comparator figures cover the statutory consultation only. Thanet District Council's figure of £190,000, approved in August 2025, covered specialist consultants, barrister oversight and associated administrative costs for proposed designations affecting approximately 12,625 privately rented homes across eight wards; the housing condition survey and feasibility study which formed its evidence base were commissioned separately, understood to have cost about £50,000, and sat on top of that figure. Applied to a designation of that size, the model above gives £190,000 to £260,000, so the Thanet actual sits at the bottom of the range and the estimates in this report are considered prudent. Barrister oversight is carried separately in this report within the counsel's opinion at paragraph 7.2.

7.5 Taking those figures together with the capped envelope of up to £40,000 at recommendation 2.4, the indicative cost of reaching a targeted designation is approximately £140,000 to £170,000 in total, and the reasonable worst case, being a borough-wide designation with every element commissioned externally, is approximately £275,000. Increasing the coverage from around 1,500 properties to the whole of the private rented stock, seven times the number of properties, adds around 60 per cent to the total, because most of the evidence and consultation spend is fixed irrespective of scope. It follows that the scope of any designation should be set by the statutory tests and the evidence, and not by the budget.

7.6 Recovery of pre-designation costs. Comparator authorities treat the cost of establishing a scheme, including the statutory consultation, as recoverable through the licence fee across the life of the designation. Manchester City Council states expressly that fee income funds the consultation process, and Thanet District Council funded its £190,000 from an invest to save reserve on the same basis. Subject to confirmation from Legal Services that set-up costs may be included in the fee model, the pre-designation costs above are forward funding, repaid from ring-fenced fee income should a designation be made. They become irrecoverable only if the Council consults and then decides not to designate or designates a materially smaller area than that consulted upon.

7.7 Running the scheme. Once designated, a scheme should be broadly cost neutral and does not form part of the budget sought at this meeting. Rotherham Metropolitan Borough Council's 2026 to 2031 scheme budgets total costs of £4,119,660 against matched income of £4,119,660, split between £1,154,287 of administration and £2,965,373 of scheme maintenance. The London Borough of Bexley's Belvedere scheme shows £1,415,000 of costs against £1,423,000 of income. The published fee range across England is narrow, at £850 at Gateshead, £764 to £964 at Manchester, £950 at Barking and Dagenham, £995 at Westminster and £1,000 at Newcastle. Provided the fee is correctly set and the estimate of the licensable stock is sound, a scheme is self-funding.

7.8 Cash flow. The material financial question is one of timing rather than of quantum. Comparator authorities report that the majority of fee income arrives within the first eighteen months of a scheme and is then ring-fenced and drawn down across the life of the designation, whereas expenditure begins at designation. What is likely to be required of Full Council at stage 7 is therefore forward funding to bridge the period between designation and first receipts, repayable from ring-fenced fee income, rather than a permanent addition to the base budget. Pending the fee model, the mobilisation cost at stage 8, being posts established ahead of income, configuration of the case management system and notification of landlords, is indicatively £75,000 to £150,000 for a targeted designation.

7.9 Reasonable worst case. The reasonable worst case in financial terms is that the Council completes the evidence base and the full statutory consultation and then decides not to designate, or designates a smaller area than that consulted upon, in which event expenditure of up to approximately £275,000 would be irrecoverable. The staged approvals at paragraph 5.20 are designed to limit that exposure. The principal post-designation risk is judicial review of a designation. No selective licensing scheme has been quashed on this ground to date, but were a challenge to succeed, licence fee income already collected and largely committed to delivery would fall to be refunded. That risk argues for expenditure on the quality of the evidence base rather than for contingency within the budget, and it is recorded in the risk table at section 13.

7.10 Community presence and engagement. The first option at paragraph 5.12 would be a standing revenue cost rather than a one-off cost, and cannot be met from licence fee income. Fees set under the principles in R (Hemming) v Westminster City Council may fund the administration and management of a licensing scheme, including enforcement of licence conditions, but not general patrol, reassurance or community safety activity. A proportion of warden time spent on licence condition compliance could in principle be attributed to the scheme management component once a designation is in force, but that would be a modest contribution and would not arise before 2028. The third option is at nil or low cost to the Council. Officers will establish whether any Home Office funding associated with dispersed accommodation is available and the work at recommendation 2.7 will set out the indicative cost and the funding routes, including whether a growth bid to Full Council would be required.

8.0 Legal Implications

8.1 The principal risks are: a direction made against officer advice being quashed with costs; wording indicating a closed mind on licensing rendering a future designation vulnerable to a predetermination challenge; and framing around occupants rather than arrangements engaging section 149 of the Equality Act 2010. The recommendations are structured to manage all three.

8.2 From a planning perspective, no legal implications arise at this stage from the evidence gathering at recommendation 2.3.

8.3 Responses to the non-statutory survey will be processed in accordance with a published privacy notice. Free text responses will be redacted of personal data, and of any material relating to matters under investigation, before publication or reporting.

9.0 Equalities implications

9.1 Following the completion of an equality impact assessment, the following issues have been identified:

9.1.1 private renters are disproportionately younger, lower income, disabled and from minority ethnic backgrounds, so both the benefits and the costs of licensing fall disproportionately on those groups, and fees may be passed on in rent;

9.1.2 the subject matter engages the duty to foster good relations between groups, which bears directly on the framing of this report, the debate and communications.

9.1.3 a community presence or engagement function deployed in areas where dispersed asylum accommodation is concentrated could be perceived as, or become, a function directed at the occupants of that accommodation by reference to a protected characteristic.

9.2 It is proposed to mitigate the above by implementing the following mitigations:

9.2.1 framing the report, debate and communications by reference to accommodation type and procurement, not occupants, with a member briefing on the section 149 duty before the meeting;

9.2.2 targeted tenant engagement through advice agencies during the licensing consultation, and a full assessment of fee effects with any designation report.

9.2.3 if the work at recommendation 2.7 is taken forward, deployment determined by area and incident data only, written operating instructions and training on the Equality Act 2010, recording of all reports to the accommodation contractor by reference to conduct, and communications describing the function by reference to the areas served and the services provided.

9.3 From a planning perspective, no equalities implications are anticipated at this stage from the evidence gathering at recommendation 2.3.

10.0 Health implications

10.1 None noted

11.0 Climate and environmental implications

11.1 None noted

12.0 Section 17 Crime and Disorder Implications

12.1 If the recommendations are approved, the decisions will bring the following benefits from a Section 17 crime and disorder perspective:

12.1.1 a licence condition requiring landlords to act on anti-social behaviour by occupiers and to provide an out of hours contact;

12.1.2 an accurate address list enabling joint tasking with Warwickshire Police and the Community Safety Partnership, and a fit and proper person test.

12.1.3 if the work at recommendation 2.7 is taken forward, a visible Council presence in the areas concerned, an address level record of incidents supporting both joint tasking and the evidence base for licensing, and an established reporting route to the accommodation contractor and the Home Office for conduct concerns.

13.0 Risk management implications

13.1 The following risk management implications have been identified, with mitigations:

Risk	Mitigation
Article 4 Direction	
Evidence gathering exercise is incomplete.	Consolidation and partner data exercise is aimed to recreate a single reconciled baseline which can be maintained thereafter.
Partners decline or delay data sharing	Approach through the Community Safety Partnership and Warwickshire chief officer arrangements, with an information sharing agreement and agreed methodology; escalation to the Leader as per the recommendations.
Licensing	
Framing around occupants engages section 149	Paragraph 5.15 and 5.19, equality impact assessment, member briefing
Legal position on licensing dispersal accommodation not as stated	Legal Services confirmation before publication
Licensing scheme under-recovers against the fee model	Full financial model and conservative take-up assumptions at designation stage
Designation successfully challenged by judicial review; licence fee income already collected and committed falls to be refunded.	Counsel's opinion on the section 80(6) evidence before the designation report; designation scoped to the areas the evidence supports; no reliance on public support alone.
Statutory consultation curtailed or not run for the full ten weeks, rendering the expenditure abortive.	Consultation programmed at twelve weeks with a single commitment point at stage 4; no partial running.

Risk	Mitigation
Community presence and engagement	
A standing revenue cost is committed without a confirmed funding route.	No approval of cost or posts at this meeting; funding route identified in the work at recommendation 2.7 before any post is established, and fixed term in the first instance.

14.0 Human resources implications

14.1 The evidence work at recommendation 2.3 will be undertaken within existing resources. A section 80(6) evidence base costs less to commission than a housing condition survey but makes heavier demands on officer time, and that demand will be managed through reprioritisation within the service. A licensing scheme would require additional posts funded from fee income, with posts established ahead of income; a staffing model will accompany any designation report.

15.0 Biodiversity Implications

15.1 No direct biodiversity implications have been identified.

16.0 Local Government Reorganisation (LGR) Implications

16.1 The following LGR implications have been identified:

16.1.1 a licensing designation runs up to five years and a non-immediate direction takes twelve months to come into force, so it would be the intention to transfer to a successor authority with their income, caseload and liabilities.

16.2 It is proposed to mitigate the above by implementing the following mitigations:

16.2.1 engagement with the LGR programme team before any designation report, and discussion with the other Warwickshire districts on a consistent approach, which also strengthens the representations at paragraph 5.19.

17.0 Options considered and reason for their rejection

17.1 In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
Article 4 Direction		
A	Abandon evidence gathering exercise	Rejected. The consultants' conclusion rests on the data any district authority holds in isolation and on data held by partners. The gap can be closed through consolidation and partner working. Therefore recommendation 2.3 seeks approval for further evidence base gathering.
B	Make an Article 4 direction now (immediate or non-immediate)	The evidence currently available does not meet the national policy tests and a Direction would be vulnerable to challenge. An immediate Direction additionally carries compensation liability.
Licensing		
C	Do nothing	Leaves the Council without a record of the multiply occupied stock, without licence conditions bearing on its management, and with a complaint led model that places the burden on tenants.
D	Accreditation or inspection instead of licensing	Accreditation reaches only compliant landlords; inspection without licensing is unfunded and lacks an address list. Both retained as complementary measures.
E	Designate immediately without the statutory process	Unlawful. A consultation of at least ten weeks on the specific designations and a three month commencement period are statutory preconditions, and a designation made without them would be void.
Community presence and engagement		
F	No additional presence; rely on licensing and existing	Not selected. Licensing would not take effect before 2028 and gives the Council no presence in the areas concerned in the meantime. Neighbourhood policing resource is not within the Council's control

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
	neighbourhood policing	and is directed to crime rather than to the environmental and reassurance matters residents raise.
G	Develop a community warden function alongside partner led activity	Selected for development at recommendation 2.7. Would provide the Council's own presence, an address level evidence record and a reporting route for conduct concerns, and would address the absence of structured activity which drives the presence residents raise. No cost or funding approval is sought at this stage.
H	Purchased police or PCSO hours only	Not selected as a substitute, given operational control, abstraction risk and cost per hour, and because it provides none of the environmental, recording or referral functions. May be used alongside option G for defined periods on the advice of the Community Safety Partnership.

18.0 Conclusion

18.1 In accordance with national planning policy, there is currently not sufficient evidence to justify introducing an Article 4 Direction within the Borough. However, the evidence to reach those conclusions is not held in one place, and therefore, approval is sought for further evidence to be gathered and assembled as a single consolidated evidence base with partners. The outputs of this work will then be presented to Cabinet with further recommendations regarding whether or not there is justification to progress an Article 4 Direction.

18.2 Licensing is the measure that reaches the existing private rented stock, including accommodation procured for asylum dispersal, and recommendation 2.5 approves its introduction in principle, to be implemented through the statutory process.

18.3 The procurement of dispersed asylum accommodation is not a matter any local decision can resolve. Any representations to Government on it fall to the Leader as political lead under recommendation 2.6.

19.0 Appendices

19.1 Please note the following appendices:

i. Appendix A – DLP Report on evidence-based research of HMOs in the Borough

ii. Appendix B – Equality impact assessment

20.0 Background papers

20.1 Town and Country Planning (General Permitted Development) (England) Order 2015 can be viewed at: The Town and Country Planning (General Permitted Development) (England) Order 2015

20.2 Town and Country Planning Act 1990, sections 107 and 108 can be viewed at: Town and Country Planning Act 1990

20.3 National Planning Policy Framework (NPPF) December 2024 can be viewed: NPPF

20.4 National Planning Policy Framework (NPPF) August 2026 can be viewed: NPPF

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Appendix A

For and on behalf of
Nuneaton and Bedworth Borough Council

Research into Houses in Multiple Occupation in Nuneaton and Bedworth Borough

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APPENDICES

1.0 INTRODUCTION

1.1 The Borough of Nuneaton and Bedworth has experienced recent growth in the number and concentration of Houses in Multiple Occupation (HMOs), particularly within the areas just outside of the ring road of Nuneaton town centre and in Stockingford, which is a suburb of Nuneaton. HMO properties are perceived as bringing increased challenges in terms of parking, residential amenity, and other impacts on established communities.

1.2 Continued expansion of Nuneaton through the Transforming Nuneaton programme is expected to result in increased population growth. This programme involves Nuneaton and Bedworth Borough Council working in partnership with Warwickshire County Council to help stimulate economic growth through investment in Nuneaton town centre to improve leisure and business opportunities, education and skills, further housing development and improved transport infrastructure. This influx in expected investment and development may increase the demand for HMOs further.

1.3 Furthermore, Nuneaton town benefits from a number of advantages in terms of opportunities for economic development and employment. Most recently this has been reflected in demand from the health and social work sector, which is also understood to be contributing towards the increase in demand for HMOs locally.

1.4 The challenge presented by HMOs in Nuneaton and Bedworth is therefore somewhat different to authorities where demand tends to be primarily generated through a transient student population, such as Coventry and Birmingham, and raises potentially different material planning considerations in terms of issues such as impact on local amenity, parking requirements and issues such as design in terms of how properties are adapted to meet the requirements of HMOs.

1.5 Given the potentially materially different planning considerations within Nuneaton and Bedworth, the Council is focused on increasing their understanding of HMOs within the Borough. This is evidenced by the Council having established a cross-party Working Group which focuses on HMOs and has been involved in commissioning and overseeing this research.

1.6 In order to better understand the issue and challenge of managing HMOs in Nuneaton and Bedworth, and to make recommendations on how and whether the issue might be best addressed through the planning system - such as through Local Plan policies, Article 4 Direction, or different approaches to HMO licensing - the Research & Analysis team of DLP Planning Limited was instructed by Nuneaton and Bedworth Borough Council ('the Council') to undertake bespoke research on HMOs in the Borough.

1.7 The key objectives of this research are to:

- Assess the current demand for HMOs in Nuneaton and Bedworth.
- Analyse the spatial distribution and concentration of HMOs across the Borough.
- Evaluate the impacts of HMOs on housing mix, amenity, infrastructure and community cohesion.
- Provide a clear, evidence-based recommendation on whether an Article 4 Direction is justified, and, if so, identify the appropriate scope and geographical coverage.

1.8 This research is set within the context of the Council's existing policies within the development plan. This is with the intention that the research outputs will be relevant to support the management of HMOs in the immediate term, as well as informing a potential review of Local Plan policies in the future.

1.9 There is currently no policy within the adopted Nuneaton and Bedworth Borough Plan Review 2021-2039 (adopted December 2025) that directly addresses HMOs. In terms of parking standards and wider amenity impacts each application warrants assessment on its own merits. From a review of the evidence base associated with the recently adopted Borough Plan Review, HMOs were not identified as a key topic and were only referenced in regard to the student population of the neighbouring areas of Warwickshire and Coventry.

1.10 Assessing the range of policy options available requires consideration of the issues surrounding HMOs locally and their relationship with existing local and national policy and guidance as well as how the circumstances in Nuneaton and Bedworth Borough compare with other areas. These issues are relevant to assessing the most appropriate immediate options for management and also how future planning policies may be prepared.

1.11 The research uses a variety of methods to achieve the above objectives, including:

- Quantitative and qualitative assessment of characteristics of HMOs: including number, location, type, and changes over time - based on planning permissions and HMO licensing records;
- Review of indicators of demand for HMOs, both spatially and in the context of the wider housing market;
- Review of national policy, guidance, and best practice on delivering and managing HMOs; and
- Engagement with local stakeholders and Council officers to better understand local trends, issues, and approaches to managing HMOs.

1.12 This report presents the findings of this research and is structured as follows:

- **Chapter 2** sets out the national policy, guidance and legislative context that underpins the development and management of HMOs.
- **Chapter 3** sets out the local policy context that underpins the development and management of HMOs within the Nuneaton and Bedworth Borough.
- **Chapter 4** provides further analysis of the challenge presented by HMOs in Nuneaton and Bedworth, including quantitative and qualitative analysis of the characteristics of HMO supply and demand.
- **Chapter 5** presents a review of different approaches to managing HMOs.
- **Chapter 6** presents a benchmarking of different possible approaches to HMO management by balancing the pros and cons of each approach and taking account of their relationship with the local context.
- **Chapter 7** concludes the report by presenting a series of recommended policy options and potential timeframes for implementation.

2.0 NATIONAL POLICY, GUIDANCE AND LEGISLATION

2.1 This chapter sets out details of national policy, guidance and legislation that underpins the development and management of HMOs.

2.2 The issue of high concentrations of HMOs is something that the government has sought to address in recent years through changes to national legislation and policy. In response to concerns raised in parliament regarding the increasingly high concentrations of HMOs in certain areas, particularly as a result of the 'studentification' of some university towns and cities, the then Department for Communities and Local Government (DCLG) (May 2009) published the consultation document 'Houses in multiple occupation and possible planning responses'. In this document DCLG sought views on three options for addressing the impact of high concentrations of HMOs:

- Option one was a non-legislative option which would involve local management solutions.
- Option two would involve amendments to the Use Classes Order to allow tighter planning controls over HMOs.
- Option three would involve the use of an Article 4 Direction ('A4D') to remove powers for properties to convert to HMOs.

2.3 In response to this consultation, the government amended the Town and Country Planning (Use Classes) Order 1987 (as amended) to provide for a specific definition of a small House in Multiple Occupation (HMO) (Class C4). At the same time, they also amended the Town and Country Planning (General Permitted Development) Order 1995 (as amended) to allow changes of use between family houses and small, shared houses to take place freely without the need for planning permission.

2.4 However, in those areas experiencing problems with uncontrolled HMO development, it was determined that local authorities would be able to use their existing direction making powers (under Article 4 of the General Permitted Development Order) to restrict change of use by requiring planning applications for change of use from C3 (dwellinghouse) to C4 (small HMO) in certain defined areas. Regulations brought these changes into effect in October 2010.

2.5 The remainder of this section sets out details of current legislation, policy and guidance relating to the development of HMOs since the above changes were introduced.

a) Use Classes Order

2.6 The Town and Country Planning (Use Classes) Order 1987 (as amended) categorises various uses of land and buildings into 'Use Classes'. Changes can occur where the use moves within the same use class or from one use class to another. Planning permission may be required depending on the specifics of the proposed change of use. Some changes of use are permitted without the need for planning permission. These are specified within the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

2.7 Class C4 of the Use Classes Order refers to Houses in Multiple Occupation (HMOs), which are defined as small shared houses occupied by three to six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

2.8 HMOs with more than six individuals are classed as Sui Generis.

2.9 Class C3 of the Use Classes Order refers to Dwellinghouses, with C3(c) including groups of up to six individuals living together as a single household. This allows for groupings that do not fall within the C4 HMO definition.

b) General Permitted Development Order (for C3 to C4 conversions)

2.10 Class L of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) states that development consisting of the change of use of a building from C3 (dwellinghouse) to C4 (HMO) and vice-versa is permitted, as long as it does not involve the conversion of two or more separate dwellinghouses to a single dwellinghouse.

2.11 Change of use from either Use Class C3 (dwellinghouse) or C4 (HMO) to a large House in Multiple Occupation (Sui Generis) is not covered by Class L and represents a change requiring planning permission.

c) Article 4 Directions

2.12 As noted above, local authorities in England are able to introduce Article 4 Directions in particular areas to remove the general permitted development rights under which HMOs can be developed. This means that if an area is subject to an Article 4 Direction relating to HMOs, changing the use of a building from C3 to C4 is not permitted without first applying for planning permission.

d) HMO licensing

Mandatory Licensing

2.13 Chapter 2.1 of 'Houses in Multiple Occupation (HMOs) England and Wales' (House of Commons Library Briefing Paper, 30th September 2019) states "With effect from 6 April 2006, persons managing or controlling certain prescribed HMOs have had to have a licence in order to continue to rent out these properties.". This mandatory licensing requirement originally applied to HMOs consisting of three storeys or more and occupied by five or more people living in two or more households.

2.14 In October 2018 mandatory HMO licensing was extended to cover any properties which house five people or more in two or more separate households, regardless of the number of storeys. Regulations relating to the minimum size of bedrooms and requirements relating to refuse disposal were also introduced as part of these licensing changes. This was largely introduced to prevent 'rogue' landlords from persisting with poor property management.

Additional Licensing

2.15 Under the Housing Act 2004, Local Authorities can choose to extend licensing to include HMOs not covered by mandatory licensing. This additional licensing allows councils to require licences for HMOs with three or more people.

Selective Licensing in the Private Rented Sector

2.16 Under the Housing Act 2004 local authorities can also introduce 'selective licensing' in designated areas. Selective licensing was introduced in order to help tackle problems caused by low demand housing and anti-social behaviour.

2.17 All landlords who rent out properties in an area that is subject to selective licensing are required to obtain a licence from the local authority for each of their properties regardless of the size of property, number of tenants or whether the property is officially classed as a HMO.

e) Management of HMOs

2.18 The Management of Houses in Multiple Occupation (England) Regulations were enacted in 2006 under the Housing Act 2004. These regulations apply to all licensable HMOs in England which are rented out to three or more tenants who are not from the same household but share facilities.

2.19 These regulations outline the duties of the property manager, safety measures which should be taken, such as fire notices, maintenance responsibilities for the manager and further detail on licensing and compliance.

f) National Planning Policy Framework (NPPF)

2.20 In considering the Government's policy approach to HMOs there are no specific references to Houses in Multiple Occupation in the current National Planning Policy Framework (NPPF), which was published in December 2024. However, the NPPF does acknowledge the importance of meeting the specific housing needs of groups, which would include those requiring private rented accommodation such as HMOs. Paragraph 61 of the NPPF states

> *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community."*

2.21 Paragraph 63 of the NPPF sets a broader scope to consider the housing needs of different groups, including the size, type, and tenure of properties, which it states should be assessed and reflected in planning policies. This provides a non-exhaustive list of groups whose housing needs should be assessed, including the needs of students, those who require affordable housing and those who rent their homes.

2.22 In respect of the use of Article 4 Directions, Paragraph 54 of the NPPF states:

> *"The use of Article 4 directions to remove national permitted development rights should:*
>
> *a) where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)*
>
> *b) in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities)*
>
> *c) in all cases, be based on robust evidence, and apply to the smallest geographical area possible."*

g) Draft National Planning Policy Framework (December 2025, Consultation Draft)

2.23 It is noted that the draft NPPF (December 2025) proposes to replace paragraph 54 of the current NPPF with Policy DM10: Article 4 Directions. This policy proposes a more flexible approach to Article 4 Directions so that local planning authorities can protect the amenity and well-being of an area where there is an overconcentration of small HMOs. It does however note that this Direction should still be applied to the smallest area possible and based on robust evidence:

> *"DM10: Removal of national permitted development rights*
>
> *1. The use of Article 4 directions to remove permitted development rights should:*
>
> > *a. Be limited to situations where it is necessary to protect local amenity or the wellbeing of the area (such as safeguarding against the demolition of local facilities, preventing an over-concentration of uses which could affect the quality of life or community cohesion, or supporting the vitality and viability of parts of town centres);*
> >
> > *b. Be based on robust evidence; and*
> >
> > *c. Apply to the smallest area possible."*

2.24 Furthermore, in the new draft NPPF HMOs are not explicitly referenced in any policy. However, draft Policy HO7: Meeting the need for homes, does outline a new requirement to ensure substantial weight is given to the benefits of providing accommodation that will contribute to meeting evidenced, local community needs.

h) National Planning Practice Guidance (PPG)

2.25 In respect of assessing housing needs of different groups, current Planning Practice Guidance (PPG) paragraph 67-001-20190722 states:

> *"Plan-making authorities should assess the need for housing of different groups and reflect this in planning policies.*
>
> *When producing policies to address the need of specific groups, plan-making authorities will need to consider how the needs of individual groups can be addressed having regard to deliverability."*

2.26 In respect of how private rented sector needs can be addressed, PPG paragraph 67-002-20190722 states:

> *"Tenure data from the Office for National Statistics can be used to understand the future need for private rented sector housing. However, this will be based on past trends. The level of changes in rents, (known as "market signals"), may reflect the demand in the area for private rented sector housing. Evidence can also be sourced from the English Housing Survey, Office for National Statistics Private Rental Index, the Valuation Office Agency, Home Let Rental Index and other commercial sources."*

3.0 LOCAL POLICY CONTEXT

a) Nuneaton and Bedworth Borough Plan Review (2021-2039)

3.1 The Nuneaton and Bedworth Local Plan Review (2021-2039) was adopted in December 2025. The Plan does not contain any specific policies relating to the development of HMOs.

3.2 Policies within the adopted Local Plan that are commonly used in the determination of applications for HMOs include the following:

- **Policy H1 (Range and Mix of Housing):** This policy seeks to ensure development provides an appropriate mix of housing types and sizes based on the need and demand of the most up to date HEDNA.
- **Policy H4 (Nationally Described Space Standards):** This policy seeks to ensure that residential dwellings (including HMOs) comply with Nationally Described Space Standards unless where it is proven to be unfeasible.
- **Policy BE3 (Sustainable Design and Construction):** This policy states that all development must be adaptable, resilient and minimise climate change impacts and ensure that the principles of Secured by Design are incorporated. Developments should also contribute to their surrounding urban character.

3.3 A review of Parking Standards has also been undertaken. The Transport Demand Management Matters SPD (2026) sets out car parking space requirements in Table 1. This references Use Class C4 for HMOs (6 people or fewer) requiring 0.5 spaces per bedroom and Sui Generis HMOs (more than 6 people) considered on a case-by-case basis.

3.4 It is also noted that within the adopted Borough Plan Review evidence base HMOs are not formally referenced apart from within the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (2022) in relation to their transient student populations, which does not apply to Nuneaton and Bedworth.

3.5 The Nuneaton and Bedworth HEDNA (2022) notes that the private rented sector has grown since 2011, despite this mostly being pre 2015 growth. The HEDNA also concludes that the proportion of claimants living in the private rented sector increased by 5% between 2018 and 2021. Therefore, whilst the HEDNA[1] also outlined that the private rented sector accounts for approximately 14.4% of the population in Nuneaton and Bedworth, which is below national and regional averages, it is clear that there is still a demand for private rented accommodation including HMOs within Nuneaton and Bedworth.

b) Article 4 Direction

3.6 There is currently no Article 4 Direction in place in Nuneaton and Bedworth to restrict changes of use from C3 to C4 under permitted development.

c) HMO Licensing

3.7 Nuneaton and Bedworth Council require a HMO to be licensed where it is let to five or more people in two or more households who share amenities via mandatory licensing. There is no additional or selective licensing scheme in place.

[1] It should be noted that the HEDNA (2022) was based upon Census data which was emerging, but not complete, at the time of publication. This explains the difference between this figure and that presented in Table 3 below.

3.8 Nuneaton and Bedworth Council also has a voluntary HMO Accreditation Scheme in place. Whilst this scheme has been in place for a number of years, Council officers have confirmed that this is not actively used despite the scheme benefiting landlords by allowing them to be eligible for reduced HMO fees.

4.0 UNDERSTANDING THE CHALLENGE OF HMOS

4.1 This chapter assesses the challenge presented by HMOs in Nuneaton and Bedworth, including quantitative and qualitative analysis of the characteristics of HMO supply and demand. The evidence presented in this chapter has been informed by desk-based analysis of ONS Census 2021 data and data held by Nuneaton and Bedworth Borough Council, as well as research discussions held with officers within the Council, HMO landlords and relevant stakeholders.

4.2 This chapter sets out an analysis of local data and indicators of demand on both a local and wider context standpoint, as well as presenting analysis of the spatial distribution and concentration of HMOs across the borough.

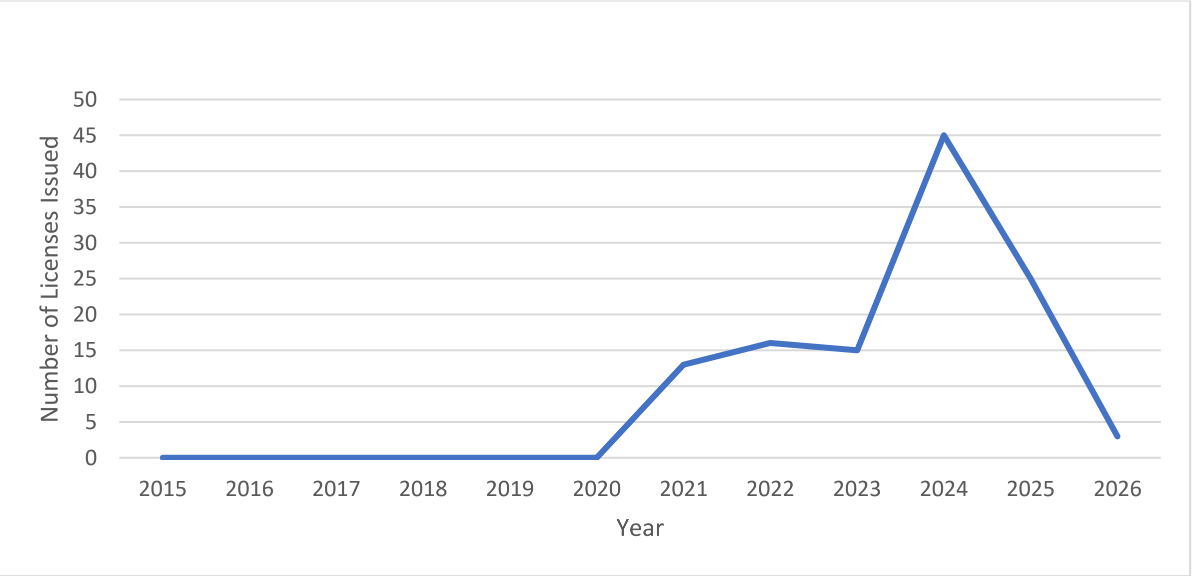
a) Number of HMOs

4.3 Based on the evidence available there are 128 HMOs in Nuneaton and Bedworth. A review of mandatory licensing records indicates that the number of licensed HMOs (comprising five or more tenants in at least two households, irrespective of property size) is currently 117 properties, with a further 11 HMOs which are not licensed have been identified from a review of planning permission data.

4.4 It should be noted that there may be other small HMOs (Use Class C4) comprising fewer than five tenants that have been allowed under permitted development rights that will not be reflected in these licensing records or planning permission data.

4.5 Figure 1 below shows the number of HMO licences issued each year amongst properties that are currently licensed HMOs (i.e., excluding properties that were previously registered as HMOs but are no longer licensed). Licences are valid for a period of five years, and therefore there are no current licences issued prior to 2021.

Figure 1: Number of current HMO licences issued in Nuneaton and Bedworth by year

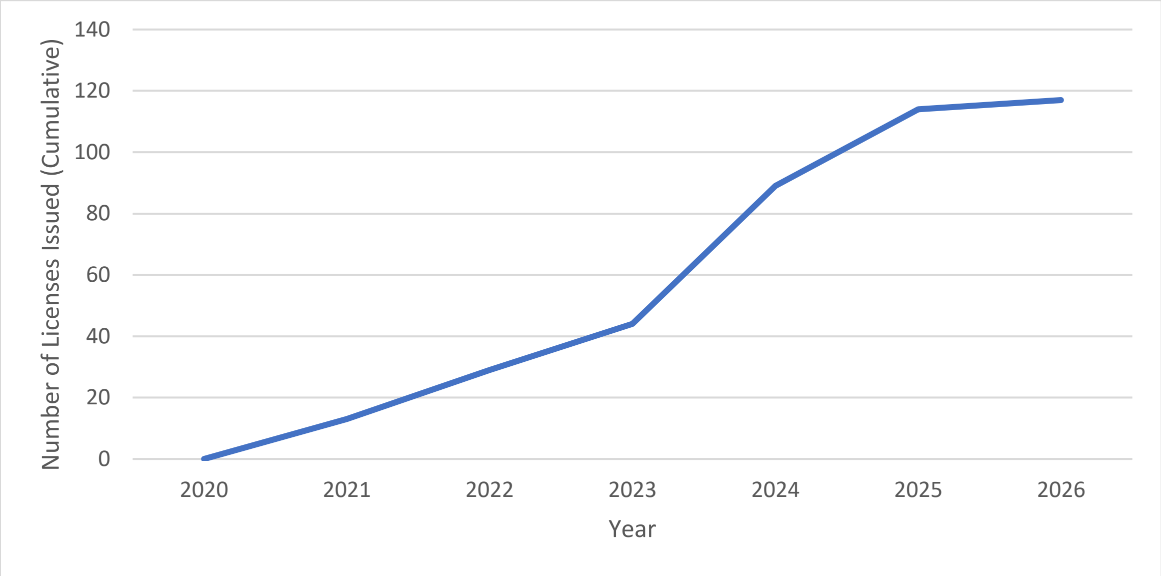


Source: *Nuneaton and Bedworth Borough Council Data*

4.6 The graph above shows that the number of HMO licences issued has steadily increased between 2020 and 2022, which after a shortfall in 2023 rose significantly between 2023 and 2024. From 2024 onwards the number of licences issued has decreased.

4.7 Figure 2 below shows the cumulative number of current HMO licences that have been issued over time, culminating in a total of 117 extant HMO licences by May 2026.

Figure 2: Number of HMO licences issued by year (cumulative)

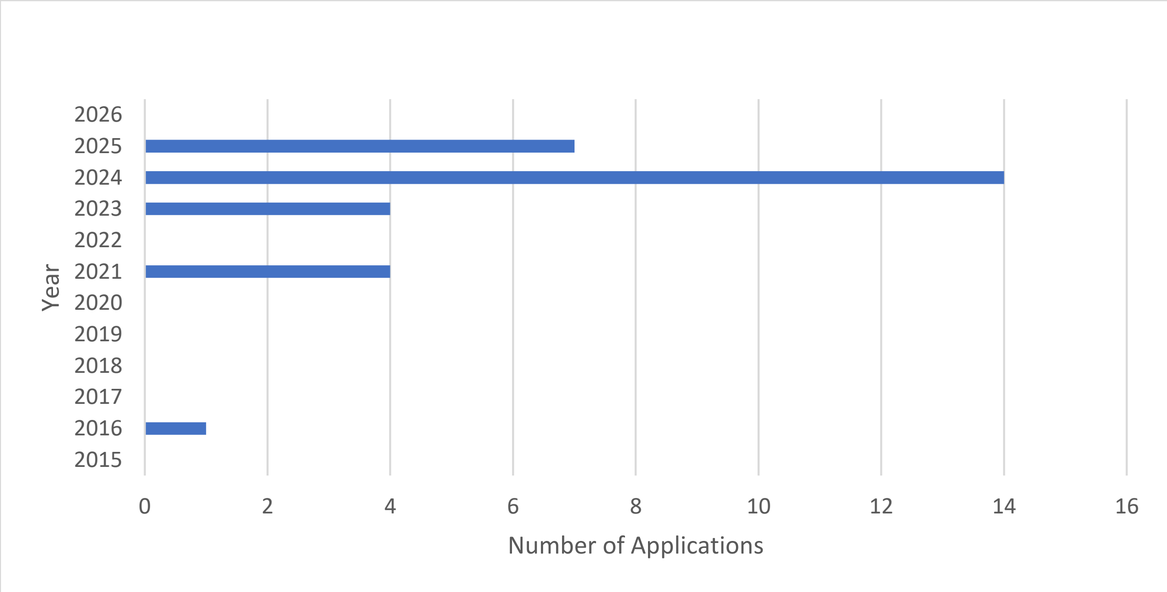


Source: *Nuneaton and Bedworth Borough Council Data*

4.8 Whilst small HMOs (Use Class C4) can be formed from the conversion of residential dwellings (Use Class C3) under permitted development rights, in other instances planning permission for the development of HMOs is required, such as developments involving the creation of large HMOs (Sui Generis), non-residential conversions and new builds. Figure 3 below illustrates how the number of planning permissions for HMOs has remained relatively steady since 2016, albeit with an increase since 2024.

4.9 This data shows permissions from January 2016 to March 2026. The permissions have also been reviewed, either via condition discharges or Google Street View checks, to confirm whether they have been implemented.

Figure 3: Number of planning permissions for HMOs by year



Source: *Nuneaton and Bedworth Borough Council Data*

4.10 It should be noted that the data shown in Figures 1 and 2 above reflect numbers of licensed HMOs only, and do not therefore include small HMOs (Use Class C4) that have fewer than 5 residents and therefore fall below the mandatory HMO licensing requirements. These small HMOs also do not require planning permission (if formed through conversion of C3 dwellinghouses under permitted development rights) and therefore these properties cannot be identified through planning records and are therefore also not included in the data shown in Figures 3 and 4.

4.11 There is therefore likely to be a proportion of HMO properties that we have not been able to identify through this research as there are no formal records of these available. Unlike areas with high student populations, where HMOs can also be identified using council tax exemption records, HMOs in Nuneaton and Bedworth are not predominantly occupied by students, so council tax records cannot be used to estimate numbers of HMOs.

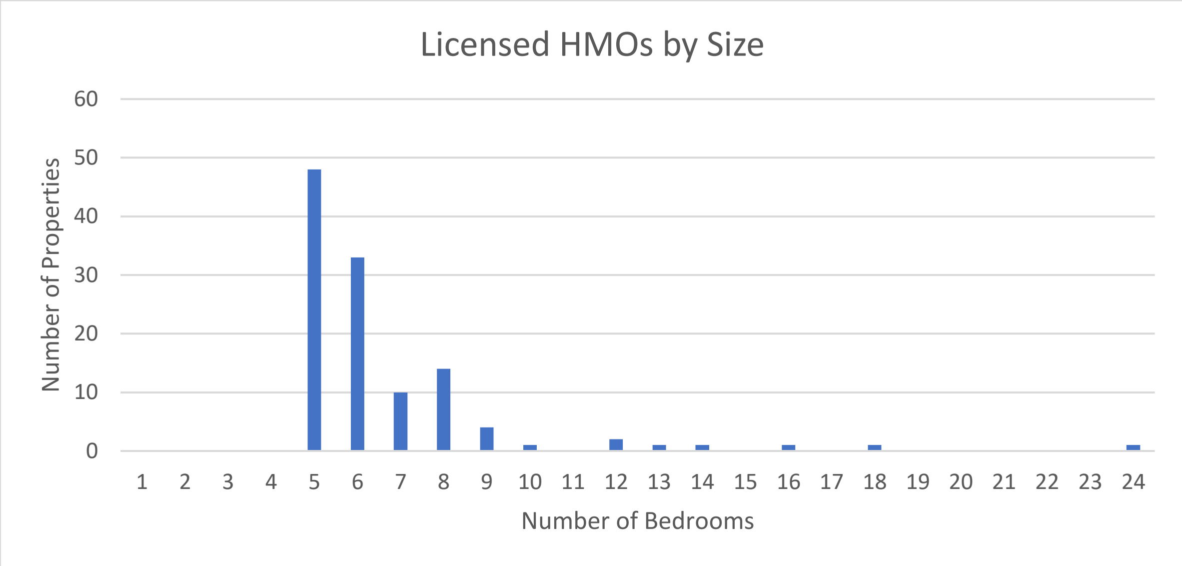
b) Characteristics of HMO Properties

4.12 HMOs in Nuneaton and Bedworth (particularly those located near to and within Nuneaton town centre) are typically characterised as Victorian or Edwardian terraced houses.

4.13 In total there are 117 licensed HMOs, however in addition to small (C4) HMOs, there are also a number of larger (sui generis) HMOs which are often purpose-built or developed through conversion of larger buildings.

4.14 Figure 4 below shows the number of licensed HMOs by size (number of bedrooms). This shows that the majority of properties are 5 and 6 bedrooms with some slightly larger properties with one being a 24-bedroom HMO.

Figure 4: Number of licensed HMOs by size (number of bedrooms) (2026)



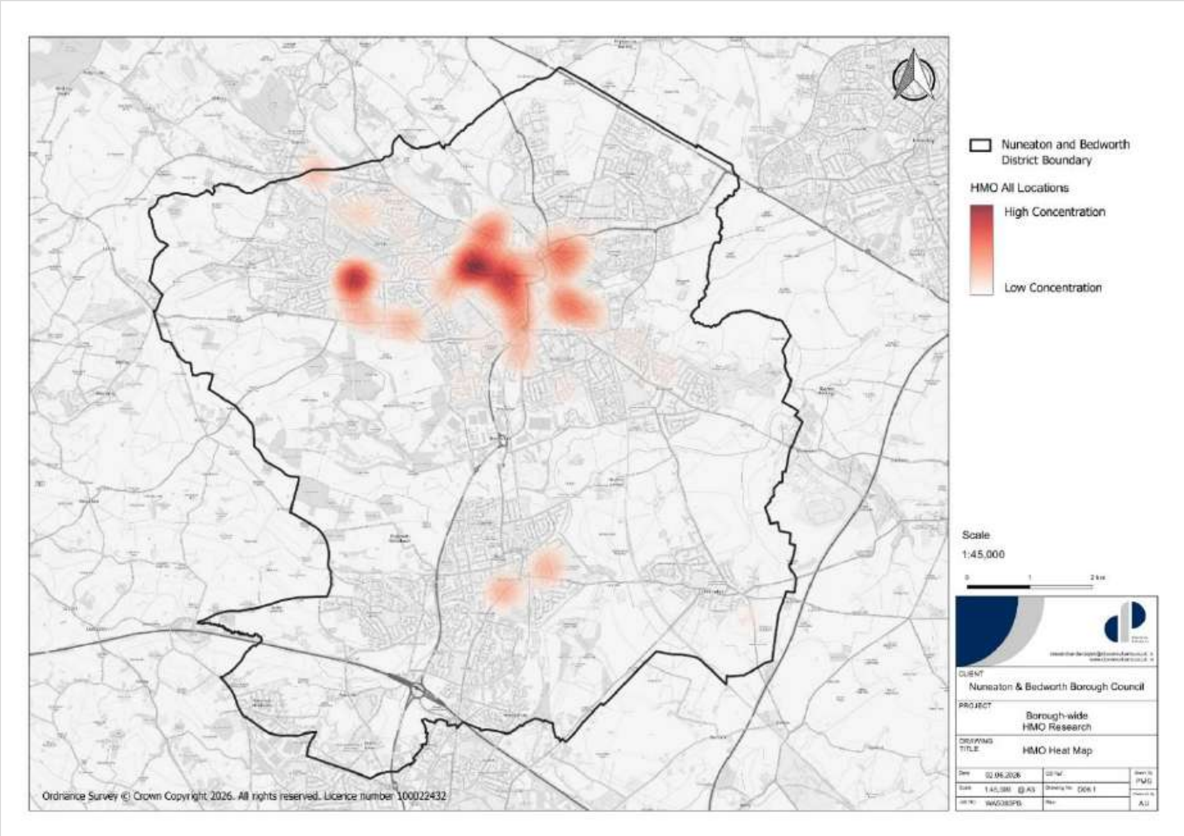
Source: *Council Data*

4.15 Many of the HMOs, particularly those in Nuneaton Town Centre, are understood to be occupied by individuals who are economically active, some of whom are working within the Healthcare sector. It is also understood that there is a proportion of HMOs managed by Serco who provide properties for asylum seekers.

c) Density and Distribution of HMOs

4.16 Existing HMOs in Nuneaton and Bedworth (that can be identified from planning and licensing records) are distributed across the Borough, as illustrated in Figure 5 below. A larger scale version of the map below is also shown in Appendix 1.

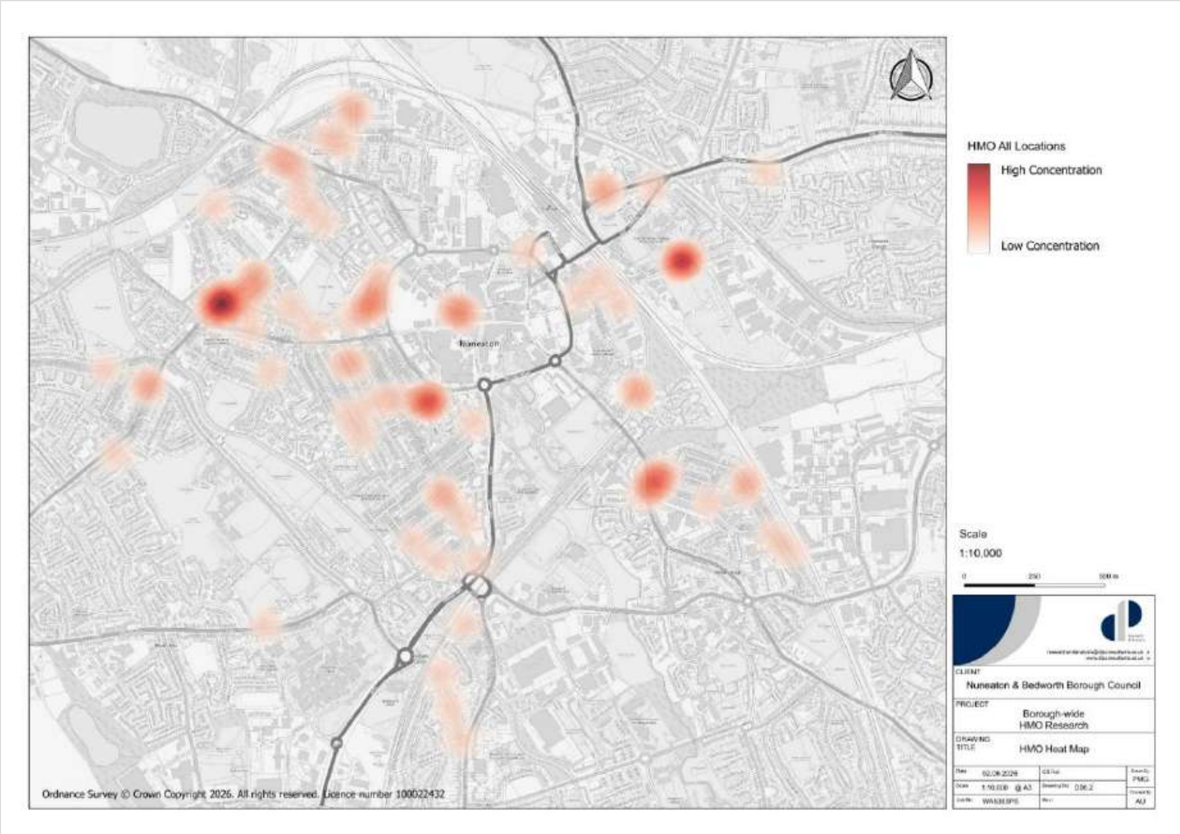
Figure 5: Distribution of HMOs in Nuneaton and Bedworth



Source: *Council HMO Planning and Licensing Records / DLP GIS analysis*

4.17 As shown in the figure above and in more detail below, the largest concentrations of HMOs are located just outside of Nuneaton town centre and in the Stockingford area of Nuneaton, which anecdotal evidence from stakeholders suggests is largely influenced by the ease of accessibility of the properties to services, employment and facilities within the town.

Figure 6: **Distribution of HMOs in Nuneaton**



Source: *Council HMO Planning and Licensing Records / DLP GIS analysis*

4.18 There are also clusters of HMOs in Bedworth but the highest concentrations are primarily in Nuneaton.

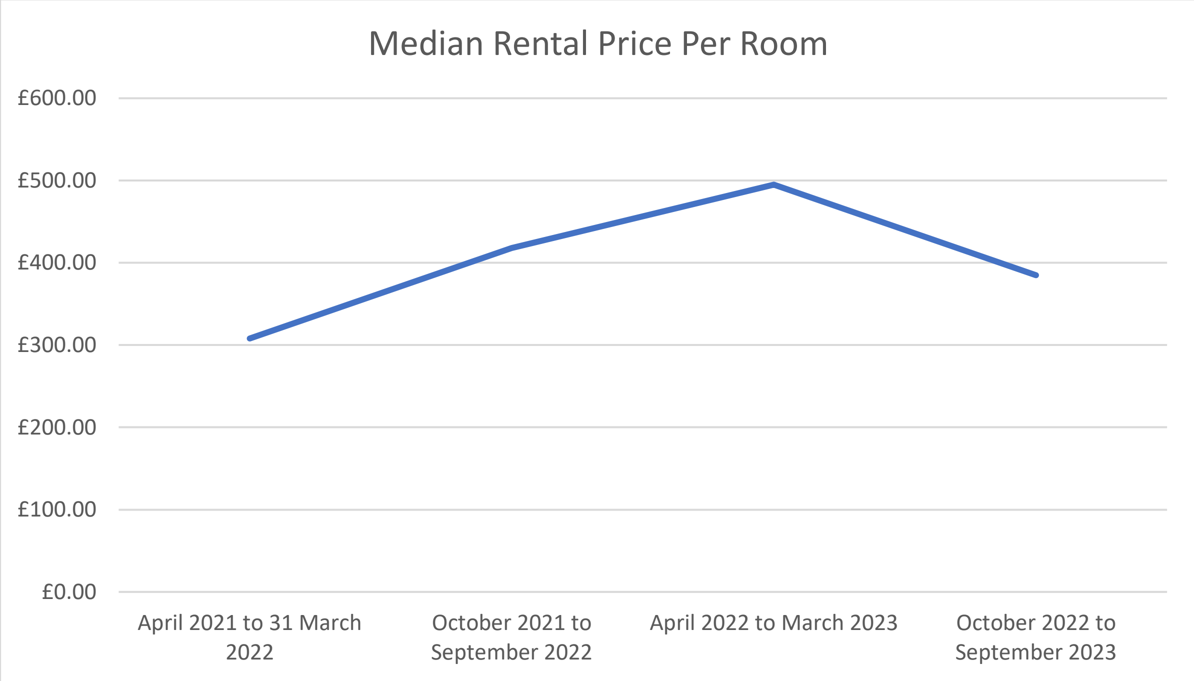
4.19 Therefore, the most significant issues and challenges relating to HMOs are likely to be in these hotspot areas where concentrations of HMO properties are highest. Given these areas are located outside of the town centre boundary it is likely that these are less sustainably connected and in primarily residential areas away from the nearby amenities associated with the town centre.

d) Housing Mix

4.20 Since 2021 there has been an overall increase in the median private rents per room, as shown in the figure below. This is likely to be at least in part reflective of an increasing demand for this type of accommodation. However, it is also noted that rental prices have slightly decreased towards the end of 2023.

4.21 A review of the Price Index of Private Rents dataset published by ONS (2026) also demonstrates that for Nuneaton and Bedworth, whilst their rental price is below that of the national average, their rate of annual change in the amount of rent shows significant change with this equalling 8.7% annually in April 2026. This shows that demand for private rented accommodation is high and that the market can be quite volatile.

Figure 7: Median Monthly Private Rents for Rooms in Nuneaton and Bedworth (£ per month)



Source: *Valuation Office Agency and ONS Price Index of Private Rents (2021)*

4.22 Monitoring levels of housing delivery by tenure and property type and size against the most recent evidence of housing need is recommended. Evidence of unmet housing needs for certain groups (particularly in terms of affordable housing need and/or the delivery of smaller properties) are likely to be factors influencing trends in the development of HMOs, although these development trends are outside of the scope of this report to consider in detail.

4.23 This is further illustrated in the currently adopted Plan's evidence base. The HEDNA (2022) concludes that there is a need for 445 affordable rented homes per year and a need for 208 affordable home ownership properties per year. The HEDNA also goes on to state that alongside this notable need for affordable housing, the provision of new affordable units is a pressing issue in the area influenced by past investment decisions and losses of stock, including through Right to Buy, which have further reduced available stock.

4.24 HMOs are therefore considered to be an important part of meeting housing needs as they often provide more affordable accommodation for people whose housing options are limited.

e) Socio-Demographic Characteristics

4.25 ONS Census 2021 datasets have been reviewed at a national and borough level to identify any socio-demographic trends in the area and to help provide a contextual understanding of HMOs in Nuneaton and Bedworth. This section also provides comparisons, where relevant, to Rugby and Coventry given they are nearby areas with evidence of high concentrations of HMOs.

4.26 Table 1 shows that 5% of the households living in Nuneaton and Bedworth live in 'other' household types. Other household types may include HMOs. This percentage is comparatively lower than the figure for England which is 7%.

Table 1: Household Composition

Households Composition	Nuneaton and Bedworth		England	
	Number	%	Number	%
All categories: Household Composition	56,587	100	23,436,086	100
One person household	16,345	29	7,052,229	30
One family only: Total	37,244	66	14,762,923	63
Other household types	2,998	5	1,620,934	7

Source: *ONS Census 2021*

4.27 In the study area one person households make up 29% of the household composition, which is comparatively quite similar nationally. This indicates that there is a strong demand for single person dwellings in Nuneaton and Bedworth. The data for Nuneaton and Bedworth is also quite similar to that of Coventry and Rugby. For example, in Coventry one-person households make up 30% of the total household composition and 27% in Rugby. Where single person households cannot afford to live by themselves, they may choose to live in HMOs on the basis of lower housing costs.

4.28 Table 2 considers the composition of housing stock within Nuneaton and Bedworth. This shows that 24% of the households are accommodated in terraced properties, compared to 23% nationally. Terraced properties do not often benefit from dedicated parking which can cause issues when used as an HMO. If more than one household residing in the HMO owns a vehicle this can lead to congestion where there are no dedicated parking areas.

Table 2: Dwelling Type

Dwelling type	Nuneaton and Bedworth		England	
	Number	%	Number	%
All categories: dwelling type	56,587	100	23,436,085	100
Whole house or bungalow: detached	14,120	25	5,368,859	23
Whole house or bungalow: semi-detached	21,569	38	7,378,304	32
Whole house or bungalow: terraced	13,649	24	5,381,432	23
Flat, maisonette or apartment: purpose-built block of flats or tenement	5,968	11	3,999,771	17
Flat, maisonette or apartment: part of a converted or shared house	603	1	821,153	4
Flat, maisonette or apartment: in commercial building	471	1	386,672	2
Caravan or other mobile or temporary structure	207	0	99,894	0

Source: *ONS Census 2021*

4.29 Table 3 below illustrates that the proportion of households in private rented accommodation (private landlord or letting agency) in the borough make up 15% of stock, an increase of 2 percentage points since 2011. This is significantly lower than that of Coventry, for example, where private rented accommodation makes up 25% of the total housing stock.

Table 3: Housing Tenure

Households Tenure	Nuneaton and Bedworth		Coventry		England	
	Number	%	Number	%	Number	%
All categories: tenure	56,585	100	134,140	100	23,436,085	100
Rented from private landlord or letting agency	8,355	15	33,195	25	4,273,689	18

Source: *ONS Census 2021*

4.30 The following socio-economic indicators consider household characteristics in the borough by ethnicity and place of birth.

4.31 Tables 4 and 5 show that whilst the population in the study area is predominantly white, 13% of the population is non-white. This is below the national average of 19%.

Table 4: Population by Ethnic Group

Ethnic Group	Nuneaton and Bedworth		England	
	Number	%	Number	%
White	116,939	87	45,783,401	81
Non-white	17,259	13	10,706,647	19

Source: *ONS Census 2021*

Table 5: Population by Detailed Ethnic Group

Ethnic Group	Nuneaton and Bedworth		England	
	Number	%	Number	%
All usual residents	134,198	100	56,490,048	100
White	116,939	87	45,783,401	81
Mixed/Multiple ethnic group	2,449	2	1,669,378	3
Asian/ Asian British	10,782	8	5,426,392	10
Black/African/Caribbean/Black British	2,446	2	2,381,724	4
Other ethnic group	1,582	1	1,229,153	2

Source: *ONS Census 2021*

4.32 Table 6 shows that the proportion of the population in the study area who were born outside of the UK is 11%, which is comparatively lower than that national figure of 17%. In comparison, in Coventry 28% of the population was born outside of the UK and in Rugby the equivalent figure is 18%.

Table 6: Population by Country of Birth

Country of Birth	Nuneaton and Bedworth		England	
	Number	%	Number	%
All usual residents	134,198	100	56,490,049	100
UK	118,758	89	46,687,506	83
Other EU	6,863	5	3,551,766	6
Other countries	8,577	6	6,250,777	11

Source: *ONS Census 2021*

4.33 The table below also shows the changes to the private rented sector over time. The picture in Nuneaton and Bedworth is similar to the wider region and thus suggests that Nuneaton and Bedworth does not face a unique challenge in regard to private sector rented accommodation, including HMOs.

Table 7: Private rented sector changes (2001 – 2021)

	2001		2011		2021		Change 2001-2021	
Private Rented Households	Number	% of total households	Number	% of total households	Number	% of total households	Number	% of total households
Nuneaton & Bedworth	2,427	5.0	6,683	12.7	9,399	16.6	6,972	11.6
West Midlands	137,225	6.4	321,670	14.0	435,884	17.9	298,659	11.5
England	1,798,864	8.8	3,715,924	16.8	4,794,889	20.5	2,996,025	11.7

Source: *ONS Census 2001 - 2021*

4.34 Upon review of the Census data presented above, it is evident that the data does not provide specific answers or show an overlap between the socio-economic characteristics of Nuneaton and Bedworth and the perceived issues arising directly from HMOs in the borough. Instead, any relationship is likely to depend on multivariate characteristics.

f) Stakeholder Feedback

4.35 As part of this research, four stakeholder engagement sessions were held to discuss HMOs and the opinion on a potential Article 4 Direction more widely. These sessions involved discussions with representatives of the HMO charity sector, landlords and Council Officers.

4.36 It should be noted that the evidence presented in this section is based on narratives provided during the stakeholder engagement sessions and as such is more qualitative in nature than the data presented elsewhere. However, given the findings are based on the experiences of informed professionals, including those directly involved in the management of HMOs, it is considered that the findings outlined below should be weighted equally alongside the quantitative data presented in this report.

4.37 In regard to topics of discussion, these focused primarily on the location of properties, changes in terms of HMO demand, the impacts of HMOs, local opinion and various HMO management tools including licensing and Article 4 Directions. Whilst the discussions were steered around these talking points, the sessions were left open to allow broader discussion of other related topics.

4.38 It was clear from these sessions that the topic of HMOs can be divisive with many competing opinions. It was apparent that some local opinion was quite negative, despite recognition that HMOs can generate numerous local benefits, such as stimulation of the local economy.

4.39 Key themes which emerged from the discussions in these sessions included:

- Perception;
- Distribution;
- Demand;
- Management;
- Policy and Article 4 Direction opinions; and
- Issues and Impacts.

4.40 The findings of each of these key themes are summarised below.

Perception

4.41 It was evident that public perception was quite negative. It was explained that this is worsened given there is a lack of awareness that HMOs are occupied by a wide range of people, including young professionals, people on low incomes and vulnerable individuals.

4.42 Furthermore, it was reported that some residents have expressed concerns about the concentration of HMOs in certain areas. Coupled with there being some concerns raised about the number of asylum seekers in HMOs, although in practice the number is relatively small.

Distribution

4.43 In relation to the distribution of HMOs, stakeholders confirmed that HMOs in Nuneaton and Bedworth are typically located in areas of terraced properties.

4.44 One stakeholder also mentioned that they considered distribution to be fairly even across the borough given the demand for HMOs is borough-wide.

Demand

4.45 Demand for HMOs in Nuneaton and Bedworth has continued to grow in recent years, in part fuelled by demand for affordable forms of accommodation, and in part by the continued growth in employment opportunities which continue to attract workers to the town, such as the hospital.

4.46 Landlords, including an increased number from outside Nuneaton and Bedworth, are continuing to invest in HMO properties in the town. Anecdotal evidence suggests landlords are investing more to create higher standards of HMO accommodation that can attract greater rental values and address a wider spectrum of demand.

4.47 It is also important to note the increase in properties let via Serco, a private contractor of the Home Office, to help house asylum seekers.

4.48 As Article 4 Directions have become more frequently explored in other authorities, officers in Nuneaton and Bedworth have also noted anecdotal increases in demand for HMOs in Nuneaton and Bedworth specifically as landlords are attracted by the limited constraints on developing small HMOs.

4.49 There is a recognition that HMOs continue to meet a local need in the absence of alternative forms of accommodation (such as affordable one-bedroom properties). HMOs also provide a convenient form of accommodation for workers, such as those on short-term contracts, as they offer a level of flexibility not found in other forms of accommodation.

4.50 Stakeholders also mentioned that professional tenants are increasingly remaining in HMOs for longer periods (often 5–6 years) while saving for a deposit to purchase a home.

4.51 High occupancy rates are noted in Nuneaton and Bedworth (~95%) suggesting a strong demand and a limited supply of homes, with some landlords purposely reducing portfolios and liquidating properties due to policy changes (e.g. the Renters' Rights Act 2025, commenced May 2026) increasing the risk for such landlords given the removal of no-fault evictions. This movement was explored more closely in stakeholder sessions, and it was suggested that this reduction in portfolios will predominantly affect younger male tenants.

4.52 Participants also noted an overall shift away from shared HMOs due to antisocial behaviour concerns and financial viability.

4.53 Detail was also provided on demand, with Nuneaton and Bedworth having differing demand to other areas given it is not a University town, with the majority of demand instead coming from young professionals and single, working-age adults.

Management

4.54 In regard to the management of HMOs, it was clear that HMO-related enforcement cases are focused mainly on issues around refuse collection.

4.55 Whilst the Renters' Rights Act 2025 is expected to improve transparency and become the main mechanism for identifying HMOs, HMO Property Managers outlined that they do not receive a significant number of complaints relating to HMOs.

Policy and Article 4 Direction

4.56 The topic of policy mechanisms and Article 4 Directions was also discussed at length during the stakeholder sessions. It was clear that licensing is seen to be more effective than planning controls (e.g. Article 4 Directions) for managing HMO impacts as it was suggested that licensing would allow better oversight of all HMOs rather than restricting new supply.

4.57 Regarding the potential introduction of an Article 4 Direction, various points were raised including:

- It would mainly increase the value of existing HMOs by limiting supply and reducing the availability of lower-cost accommodation. This reflects the pressure of the wider housing market and how this could lead to a greater demand for temporary accommodation and an increase in rough sleepers, exacerbated by a lack of smaller one-bedroom and two-bedroom market and affordable properties in the borough.

- Potential for an Article 4 Direction to improve quality of HMO accommodation.
- Caution needed when tightening regulations as supply is already constrained and demand remains high.

4.58 Another important observation highlighted by stakeholders was that the licensing regime, working in partnership with other departments in the organisation, can be effective at addressing some of the wider barriers to housing and socio-economic factors that often affect tenants in HMOs. This can, for example, include improving access to jobs, training, benefits or addressing cultural factors affecting access to support (such as language).

Issues and Impacts

4.59 The main issues with HMOs that have been identified by the stakeholders are parking, noise, waste, anti-social behaviour, and property standards (including environmental health issues).

4.60 Parking issues relate to the fact that HMOs are often located in urbanised areas and terraced streets where parking is already constrained. Whilst numerous stakeholders did state increased on street parking had been observed, it was also apparent that parking is often an unfounded issue, with HMO landlords stating that their tenants often do not own vehicles and that parking issues are typically only a perceived issue.

4.61 In regard to community cohesion, anti-social behaviour and noise are generally attributed to the greater number of people living in HMOs than in family housing. It is also apparent that the national discourse around asylum seekers and refugees has been attributed to the public perception of HMOs. In the context of Nuneaton and Bedworth, limited evidence of community cohesion issues were identified but a consistent theme regarding concerns on this matter were reported.

4.62 One HMO property manager identified waste management as being a common problem due to the average-sized council-provided bins not being large enough to accommodate the waste produced by the increased number of residents in HMOs. Issues regarding waste were also reported as being picked up and dealt with by Environmental Health.

4.63 In relation to housing mix, HMOs also become a cause for concern when they lead to a reduction in the number of available family homes. Additionally, when an area is saturated with HMOs it can be more difficult for existing property owners to sell their house as it becomes a less attractive location for owner-occupiers. However, in Nuneaton and Bedworth there is limited evidence of this having occurred.

Overview

4.64 Despite the issues raised, respondents recognised HMOs as playing an increasingly significant role in providing for a wide range of housing needs, including the provision of housing for those unable to afford housing costs without recourse to the benefit system and to house people who were previously homeless or in need of supported housing. It is important to note that these elements of the HMO sector can and do co-exist with other provision providing a high standard of accommodation catering for the short-term needs of young professionals, reflecting the diversity of housing needs.

4.65 This was also evident by stakeholders confirming that the concentration of HMOs in some areas of Nuneaton and Bedworth may have helped allow infrastructure and amenities to be improved including providing additional passenger numbers which may have helped keep certain bus routes open.

4.66 Overall, it was clear that a key concern in terms of recommendations and approaches to managing the use and development of HMOs is with maintaining concentrations at manageable levels to ensure a social mix is retained and areas do not become saturated with HMO properties.

4.67 Therefore, these challenges, as identified by the stakeholders interviewed as part of this research, indicate a need to examine the Council's approach to managing HMOs and identify potential options for how the issue may be more effectively managed in the future, as detailed in the subsequent sections of this report.

5.0 EVALUATION OF THE IMPACTS AND APPROACHES TO MANAGING HMOS

5.1 This chapter will compare the approaches that could be taken to manage HMOs including through Local Plan policies, Article 4 Directions, and approaches to HMO licensing.

a) Policy Approaches (Emerging and Adopted policies, use of Article 4 directions)

5.2 In terms of what other authorities do to manage HMOs, many authorities adopt a percentage-based policy which they find to be successful. This is where a Council will limit the density of HMOs within a certain radius of an application site. Local authorities will look at the number of licensed HMOs in the area, however as licensing varies across districts this can be difficult to monitor.

5.3 For example, Birmingham City Council use a percentage-based policy which was informed by Chapter 9 of the Report 'Balanced Communities and Studentification' by The HMO Lobby, which lists the criteria for a balanced community to have no more than 10% of HMOs[2]. However, these policies tend to be used in conjunction with an Article 4 Direction to inform decisions on applications for HMO developments or the change of use of a dwellinghouse to a HMO.

5.4 An example of this can be seen in Policy H6 of Oxford City Council's Local Plan (Adopted 2020) which states: "Planning permission, where sought for the change of use of a dwelling in Use Class C3 to an HMO, will only be granted where the proportion of buildings used in full or part as an HMO within 100 metres of street length either side of the application site does not exceed 20%".

5.5 Sheffield City Council takes the approach further by publishing HMO densities online so that landowners can check to see if they are likely to be granted permission for a HMO. This database is however only updated sporadically and requires officers to update the figures for each HMO application. This means that the Council do not tend to receive many applications in areas with +20% HMO density. This may be a good way to control the workload that licensing brings in.

5.6 Some Councils, such as Birmingham, with Universities in their area generating a high housing demand amongst students have adopted policies aiming to build more purpose-built student accommodation (PBSA). Whilst this can decrease the number of properties that are being converted to HMOs as the demand from students is lessened. However, it does not have a significant effect on reversing HMOs as landlords are unlikely to want to reconvert to C3 dwellinghouses where this would negatively affect rental values and yields.

5.7 Other policies surrounding the impacts of HMOs such as parking, noise, design, and diverse communities were implemented by some Councils, including Coventry City Council under their adopted Local Plan (2011 – 2031) Policy H11. For example, many Councils have policies on minimum bedroom sizes and amenity for dwellings. Often included in HMO policies was the requirement for off-street parking to meet the needs of the residents and prevent overcrowding on the street. However, it is difficult to refuse HMO applications based on these policies alone.

5.8 It is clear that Article 4 Directions need to be supported by robust planning policies against which applications for C3 to C4 conversions can be assessed. If a Council does not have this, they may avoid bringing in an Article 4 Direction or may need to introduce such a policy

[2] Houses in Multiple Occupation SPD

when their Local Plan is next updated.

b) Approaches to HMO Licensing

5.9 Some authorities opt to manage HMOs through selective or additional licensing rather than Article 4 Directions; however, authorities such as Sheffield City Council and West Northamptonshire (former Northampton Area) have implemented licensing alongside Article 4 Directions.

5.10 Mandatory HMO licensing requires landlords who are renting out a large HMO (5 or more people) to obtain a licence. The Housing Act 2004 provides for licensing to be extended by a local authority to include HMOs not covered by mandatory licensing.

5.11 Additional HMO licensing allows Councils to require licences for HMOs with three or more people, as opposed to the usual five or more people. The local authorities that we found to have implemented additional licensing include Nottingham Council and Coventry City Council. Coventry City Council require HMOs with three or more occupants to be licensed and allows them to improve the quality of the houses.

5.12 Local authorities have the power to introduce selective licensing of privately owned homes in order to tackle problems in their areas caused by low housing demand or anti-social behaviour. In areas subject to selective licensing, landlords who are renting out properties are required to obtain a licence. Selective licensing focuses on the standards of all housing, not just HMOs. This is attractive as it means that the issues of poor-quality living conditions in HMOs can be avoided. Authorities which have implemented selective licensing include Sheffield City Council and Peterborough Council.

5.13 Tools to assist engagement with private sector landlords, such as ‘landlord forums’ were considered to perform well upon the introduction of licensing to help raise awareness of requirements and procedures.

5.14 Licensing requirements were not regarded as particularly onerous or to act as a disincentive for landlords operating in the area already familiar with providing HMOs and meeting the standards set out. When implemented effectively, licensing is considered a robust means of identifying and addressing issues with ‘rogue landlords’ but typically levels of Housing Enforcement activity remain low, and issues typically addressed through engagement and early intervention. This stance on such licensing requirements was supported by this report’s stakeholder engagement session findings.

c) Effectiveness of Approaches to HMO Management

5.15 To assess the effectiveness of the policies and licensing implemented, this study also looks at planning appeals for HMOs[3] that have been both dismissed and allowed to see what comments the Planning Inspectors made. Out of the appeals reviewed generally, more appeals were rejected than they were accepted.

5.16 The appeals that were dismissed tended to draw on policies relating to concentrations of HMOs, indicating that having this type of policy in place is effective.

5.17 Another factor that was seen throughout the appeals was the appropriateness of the property for family occupation. This was evident where appeals that were in predominantly mixed-use

[3] Cases reviewed include: APP/U4610/W/20/3262973, APP/B1415/W/18/3218183, APP/N4720/W/18/3202128, APP/Q3060/W/20/3259883, APP/T3725/C/19/3243858, APP/P4605/W/25/3359535, APP/P4605/W/25/3365333, APP/W2845/W/25/3371766, APP/N4205/W/24/3374190 and APP/V2825/W/17/3186111.

and commercial areas were deemed to be less suitable for family occupation.

5.18 The appeals that were allowed tended to be accepted due to their location or the HMO density of the area being low, highlighting the importance of effective monitoring of where known HMO properties are.

5.19 In University areas, it was more likely that appeals were allowed as the need for HMOs for students was considered favourably.

5.20 Where Councils have concentration-type policies in their Local Plans Planning Inspectors would generally comprehensively assess the effect of the proposed HMO development on the concentration of HMOs in the area and compare this to the policy threshold. Where the proposed concentration would be less than the policy limit, the relevant appeal would often be allowed.

5.21 There were, however, cases where the Council's calculated HMO densities were proved to be incorrect by the Planning Inspector. Planning permission was refused for a HMO in an Article 4 Direction area in Sheffield[4] due to the concentration of shared housing in the area already being too high.

5.22 However, at appeal this was proved incorrect with the Planning Inspector accepting that the Council had incorrectly included PBSA in the original decision despite it not being included as shared housing in the Council's policies. This is an example of where strong policies are needed to back up Article 4 Directions and how important proper monitoring is.

5.23 Anti-social behaviour is also often seen as an issue with HMOs however it was determined by the Planning Inspector in an appeal[5] for a large HMO in Birmingham that the increased surveillance that naturally comes with a HMO can lead to a reduction in anti-social behaviour. This is an important point when considering community cohesion in regard to planning for HMO development.

5.24 Therefore, this indicates the more subjective nature and planning judgement required for decision-taking when applying criteria-based policy requirements necessitating the assessment of considerations such as amenity, design, and impact on the surrounding area.

[4] APP/J4423/W/16/3141897
[5] APP/P4605/W/20/3259996

6.0 BENCHMARKING OF APPROACHES TO MANAGEMENT OF HMOS

6.1 The purpose of this chapter is to assess and summarise the strengths and weaknesses of the different approaches to managing HMOs to assess which would be most suitable taking account of the local context in Nuneaton and Bedworth and in-particular those parts which demonstrate the greatest concentration of HMOs.

6.2 The purpose of benchmarking is to provide the Council with a starting point to consider what are a cascade of different options.

6.3 The starting point for these options is defined by the Council continuing to rely on existing planning policy and national policy and guidance to determine applications for HMO development and to compare this with experience in other authorities.

6.4 Considerations for future planning policy options to manage HMOs through the policies of the development plan are based on evaluating the current starting point and existing context for HMO development against the following questions:

- Whether management of the concentration of HMOs through planning policy is likely to be justified and effective
- Would it be appropriate to seek for HMOs to meet other requirements for development e.g., space standards, storage, and car parking
- Are other criteria justified and relevant to the assessment of applications e.g., design and impact on local character and amenity

6.5 There is unsurprisingly a substantial overlap between the answer to these policy considerations in any setting and the outcomes of policymaking amongst other authorities. This allows a clear list of planning policy options to be identified and reviewed for the purposes of benchmarking:

- Amenity-based policy
- Proximity-based policy
- ‘Intensification of residential use’ policy
- Density / radius-based policy

6.6 The potential role and benefits of a **Supplementary Plan** is considered within the context of different planning policy options.

6.7 Benchmarking of the potential role of **Article 4 Directions** is undertaken separately as a discrete topic. This cannot be divorced from the current and likely future planning policy context in terms of their likely operation in practice. Benchmarking for these purposes considers the benefits and disbenefits of removing Permitted Development Rights including experience of these and the potential options for the extent and criteria used to define the Article 4 Direction.

6.8 Commentary on the **HMO Licensing** regime is also provided for comparison purposes.

a) Planning policy

<u>*Amenity-based policy*</u>

6.9 This is a standalone approach to policy and therefore does not require an Article 4 Direction for it to be effective. It can, however, be used in conjunction with density/radius policies and Article 4 Directions to make it more effective.

6.10 In practice, the reference to HMO development within such policies is not necessarily explicit and may be capable of being assessed as part of general criteria relating to development standards without necessarily enabling consideration of issues directly related to these uses. Such policies, whether specific or addressed as part of general development management criteria, can be subjective and rely on planning judgement for the purposes of decision-taking.

Proximity-based policy

6.11 The application of proximity-based policy only concerns adjacent properties and therefore does not account for other properties in the immediate vicinity such as those on the opposite side of the road.

6.12 This policy alone does not address overall HMO density issues that potentially arise from overconcentration measured in a defined area. For example, approaches that seek to limit HMOs 'sandwiching' single family dwellinghouses or in effect seek to prevent a continuous frontage of HMO property could still enable a very high percentages of properties to be used in this way.

6.13 This policy approach is often used in conjunction with radius/density-based policy and may address some additional amenity issues such as noise.

'Intensification of residential use' policy

6.14 There is a significant overlap between this policy approach and more general amenity-based policy considerations. In some instances (such as the South East Lincolnshire Local Plan 2019) criteria to manage the impacts of intensification and the effect upon amenity are included and justified within a single policy.

6.15 In some cases (South East Lincolnshire again being an example) the assessment of impacts of intensification will only apply to the development of large (Sui Generis) HMOs.

6.16 Therefore, these intensification policies may exist where Permitted Development Rights continue to provide for Change of Use from Use Class C3 to C4.

6.17 Justification for this approach typically arises from the impact on the stock of family-sized housing arising from trends in HMO development (in some cases the same policy will also address the sub-division of family housing to self-contained flats). Where these pressures are particularly pronounced the application of such policy may be limited to a particular geographic area without specific evidence of an overconcentration of HMOs.

6.18 Whether such policies are justified or effective in practice is likely to be determined by the housing needs of different groups and whether there is genuine evidence that development trends are preventing mixed communities being sustained and are compromising the availability of family-sized accommodation.

6.19 Intensification policies can also be beneficial at improving development outcomes, such as through providing justification for use of the Nationally Described Space Standards when assessing new proposals for HMOs.

Density/radius-based policy

6.20 This is a common policy that is often used alongside Article 4 Directions. Publishing density data online can help to reduce the number of HMO applications in areas that already exceed a 10% or 15% threshold within a given radius.

6.21 This is a labour-intensive policy as data on HMOs needs to be kept up-to-date. Property owners may have difficulty selling non-HMO properties on HMO-dense streets if they are not able to convert their property in response to what may remain significant demand for HMOs. Such approaches can, however, have a distinct impact on trends in development activity and there is some evidence that publishing density data online reduces number of HMO applications in areas comfortably exceeding the allowed threshold.

6.22 When considering whether such approaches are likely to be justified or effective it is essential to test whether existing HMO densities are high enough to enable such a policy to be necessary to prevent overconcentration and demonstrated an impact on achieving balanced communities.

6.23 Therefore, we have analysed the number of properties that would exceed a 10% or 15% threshold within a radius of 50m, 100m or 250m. The detailed results of this analysis are summarised in Table 8 below and outlined in further detail within Appendix 2.

6.24 Table 8 shows the total number of properties that exceed the concentration threshold within a particular radius.

Table 8: Density Radius Analysis for Nuneaton and Bedworth Borough – Summary

Radius	Number of properties currently exceeding threshold		Number of properties exceeding threshold (+1 HMO)	
	10% Concentration threshold	15% Concentration threshold	10% Concentration threshold	15% Concentration threshold
50m	14	3	27	11
100m	1	0	4	2
250m	0	0	0	0

Source: *DLP*

6.25 The analysis identifies 14 existing HMO properties that would exceed the '10% concentration within 50m' threshold and only 1 existing HMO property that would exceed the 10% concentration within a 100m radius. If one additional HMO was developed within a 50m and 100m radius of these properties an extra 16 properties would exceed the 10% threshold. No properties exceed the 10% threshold at 250m.

6.26 At the 15% threshold, 3 properties exceed this threshold within a 50m radius and no existing properties would exceed the 15% threshold within a 100m or 250m radius. A further 10 properties would exceed the 15% threshold if one additional HMO is developed within a 50m and 100m radius of these properties. This is a relatively low proportion of all HMOs that would exceed the concentration thresholds if an additional HMO were proposed nearby.

6.27 There is no overarching guidance and no prescribed definition of the appropriate radius or density threshold to adopt. While a 50m radius has been utilised elsewhere, relevant policies in the majority of other nearby areas adopt a radius of at least 100m.

6.28 The former Northampton Borough is one example of where a 50m radius is applied but this should be understood in context. Upon first introducing such an approach in the Interim Planning Policy Statement (November 2014) the Council utilised a 15% threshold adopted to recognise levels of demand for HMOs. This is against a background of "many streets in several Wards (including Semilong, Abington and Castle) where the thresholds of 10% are likely to be close to being reached or have been reached." While the Council has subsequently suggested reducing the threshold to 10% this was in the context of long-term evidence of increasing numbers and concentrations of HMOs (876 licensed properties and 800 'suspect' properties subject to potential enforcement investigations as of November 2018).

6.29 Care also needs to be taken to consider the practicalities of adopting a 50m threshold and ensuring any such approach is robust and capable of withstanding future challenge as this can be subject to a high degree of variability in terms of the number of properties falling within the radius. This can be affected by factors such as whether properties on adjacent streets are captured (typically determined by garden lengths and where the 'centroid' of neighbouring properties is located) and any existing flatted properties within the radius (assuming these are counted accurately). The width of neighbouring plots and characteristics of any surrounding non-residential uses are also potentially significant.

6.30 Concentrations will thus appear notably higher where these factors affect the number of properties within the radius so that they appear disproportionately low. This may correctly signify very localised clustering (i.e., multiple HMOs within a single street frontage that fall within the radius) but will not necessarily be an accurate indicator of impacts on the wider area where properties on adjacent streets that contain very few HMOs are excluded from the radius altogether.

6.31 Against this background it is relevant to apply a more detailed analysis to local data for potential levels of concentration within Nuneaton and Bedworth. To achieve this, the findings for density/threshold scenarios are considered separately for records within the Town Centre of Nuneaton LSOA Area and those outside.

6.32 The reason the town centre area of Nuneaton has been deemed an appropriate boundary for this further analysis is because it contains the highest concentration of HMOs (as shown in Appendix 1), higher than the area of Stockingford to the west of Nuneaton which is the second hot spot identified.

6.33 Appendix 3 of this report also shows a map of HMO hot spots where properties exceeding the 10% and 15% concentration within 50m (including +1 HMO) are shown to help contextualise how a radius/density policy could work in practice.

6.34 Table 9 below looks at 52 properties (of 128 total records) located outside of the Nuneaton Town Centre LSOAs.

Table 9: Density Radius Analysis for Nuneaton and Bedworth Borough – Outside Nuneaton Town Centre LSOAs

Radius	Number of properties currently exceeding threshold		Number of properties exceeding threshold (+1 HMO)	
	10% Concentration threshold	15% Concentration threshold	10% Concentration threshold	15% Concentration threshold
50m	3	2	7	4
100m	0	0	3	1
250m	0	0	0	0

Source: *DLP*

6.35 Table 10 looks instead at concentrations surrounding 75 records within the Nuneaton Town Centre LSOAs (i.e. 59% of relevant records assessed in this analysis):

Table 10: Density Radius Analysis for Nuneaton and Bedworth Borough – Inside Nuneaton Town Centre LSOAs

Radius	Number of properties currently exceeding threshold		Number of properties exceeding threshold (+1 HMO)	
	10% Concentration threshold	15% Concentration threshold	10% Concentration threshold	15% Concentration threshold
50m	11	1	20	7
100m	1	0	1	1
250m	0	0	0	0

Source: *DLP*

6.36 The findings within Table 10 show that if a density/radius policy were in place any application for HMO development located close to those properties that already exceed the 10% or 15% threshold would also be in breach and thus potentially in conflict with any future development plan policy stipulating thresholds that should not normally be exceeded.

6.37 Thus, this indicates that there is presently only limited justification for the introduction of a radius/density threshold within Nuneaton and Bedworth and that in isolation the effectiveness of such an approach is likely to be questionable in terms of managing the number and characteristics of HMO development.

6.38 It should also be noted that testing for the purposes of this report reflects a position at a point in time that corresponds to the current licensing and recording of HMOs in Nuneaton and Bedworth. The density calculations are therefore likely to exclude a number of small HMOs (fewer than 5 residents) not currently subject to licensing or any control over land use through the removal of Permitted Development Rights via Article 4 Direction.

6.39 Were a radius/density policy to be developed alongside or after any other changes in approach to management which revealed a higher number of records for HMOs (for example - should planning permission be required for Change of Use from Class C3 to C4 subject to successful implementation of an Article 4 Direction) the number of properties in breach of the 10% or 15% threshold could increase quite quickly. It should be noted that this would not necessarily be determinative of any level of additional impact upon the surrounding area.

b) Supplementary Plans (SPs)

6.40 The introduction of Supplementary Plans (SPs) is one of the planning reforms outlined within the Levelling-up and Regeneration Act 2023, which seeks to streamline the plan-making system and replace the existing system of Supplementary Planning Documents (SPDs). As part of these changes, it is important to note that whilst SPs will play a similar function to SPDs, SPs will now form part of the Local Plan and are able to change existing local planning policy.

6.41 SPs are intended to provide more detailed policy guidance on specific topics or geographic areas, sitting beneath the adopted Local Plan while carrying greater statutory weight than the current SPD regime. They are expected to be subject to consultation and independent examination, giving them increased status in decision-making compared with SPDs.

6.42 In the context of managing HMOs, a SP could provide a more comprehensive policy framework to support the implementation of Local Plan policies. It could set out detailed guidance on matters such as concentration thresholds, amenity standards, design expectations, evidence requirements, and the assessment of cumulative impacts. This additional level of detail could improve consistency and transparency in decision-making, provide greater certainty for applicants and communities, and strengthen the Council's position when determining planning applications or defending decisions at appeal.

6.43 However, there are also a number of considerations that weigh against preparing a SP. As a statutory planning document, its preparation is likely to require a significant commitment of officer time and resources, including evidence gathering, public consultation and independent examination. The process is therefore likely to be more time-consuming and costly than the preparation of previous SPDs, potentially reducing the ability to respond quickly to emerging issues. In addition, SPs cannot introduce new planning policy that is not already supported by the adopted Local Plan. Their role is to provide additional detail and guidance rather than establish new policy principles, meaning their effectiveness in managing HMOs will ultimately depend upon the strength and scope of the underlying Local Plan policies.

6.44 On balance, whilst a SP could provide useful additional guidance to support the management of HMOs, it is unlikely to be the most effective standalone mechanism where significant policy change is required. A SP is recommended to be considered as a secondary measure to provide detailed implementation guidance where there is a clear need for greater clarity or consistency in the application of those policies. Given the resource implications of preparing a SP, the Council should carefully assess whether the benefits of enhanced guidance and statutory weight justify the costs, particularly where existing Local Plan policies and other management may already provide an effective framework for managing HMO development.

6.45 Whilst no authority has yet prepared a SP for HMOs, Coventry City Council adopted a HMO Development Plan Document in March 2025, which is similar to a SP insofar as it forms part of the development plan and was subject to examination. This document acts as a statutory document to help officers determine applications alongside the adopted Local Plan.

6.46 The Coventry City Council HMO DPD sets out a suite of policies for managing HMOs, including: amenity-based policies (HMO1 and HMO4) which relate to accessibility and parking, design and other amenity considerations; a concentration threshold policy (HMO2) which sets out a concentration threshold of 10% within a 100 metre radius of the application property; and a 'sandwiching' policy (HMO3) which prevents a non-HMO dwelling being sandwiched between two HMOs.

6.47 Therefore, in circumstances relating to HMOs, a relevant SP has the ability to provide additional policies required for the effective management of HMOs without having to wait for the adoption of a new Local Plan, although the potentially significant resources and timescales involved in preparing a SP should be taken into account.

c) Article 4 Direction

6.48 This policy can lead to a reduction or stabilisation in HMO densities if accompanied by appropriate planning policies.

6.49 The key determinant of whether an Article 4 Direction results in materially different land use outcomes and changes to how housing stock is used is not the Direction itself but rather whether an effective and justified policy position in the development plan exists to support the determination of planning applications.

6.50 Means of 'testing' existing levels of HMO development and potential overconcentration are likely to be required alongside general design and amenity considerations. By extension, circumstances for an Article 4 Direction to comfortably exist and effectively manage trends in the development of HMOs are unlikely to be present without access to high-quality and regularly updated data on the distribution of HMOs.

6.51 A 12-month notice period is required to avoid landowner claims for compensation. The policy can also result in an increase in HMO applications which can be costly to manage. It can also impact house prices as existing HMOs are 'locked in' and thus likely to attract a premium both in terms of sale and rental values.

6.52 Further additional work can also arise for Councils and landowners (for example when selling property) as it is likely that requests to demonstrate that the current lawful use of residential property comprises a Use Class C4 (or Sui Generis) use will be submitted. This will be because such interested parties will want to avoid the impact of the Article 4 Direction.

d) Licensing

Additional licensing

6.53 Additional licensing helps to regulate HMOs that aren't covered by mandatory licensing. The number of HMOs in an area can be monitored and controlled better with additional licensing as it is not just the large HMOs (5 or more tenants) that are subject to regulation.

6.54 The findings of this study, as shown in the stakeholder engagement sessions, are that mandatory (and potential additional) licensing results in positive HMO management outcomes.

6.55 Despite this, it is noted that the HMO Accreditation Scheme which has previously been in place for Nuneaton and Bedworth has had a poor uptake and so the shortfalls of this implementation will need to be worked around if implemented again.

Selective licensing

6.56 Selective licensing applies to all rented properties within an area, regardless of whether it is a HMO. It focuses on the quality of housing and can help to combat anti-social behaviour.

6.57 As selective licensing focuses on the quality of all rented properties, it does not directly reduce the number of HMOs in an area, but the findings of this study, as shown in the stakeholder engagement sessions, are that it could result in positive management outcomes and it would be unlikely to deter landlord uptake of properties.

7.0 SUMMARY AND RECOMMENDATIONS

a) Overall Context for the Study's Conclusions and Recommendations

7.1 The analysis in this report provides the Council with evidence to address how the development of Houses in Multiple Occupation (HMOs) can be appropriately managed in Nuneaton and Bedworth Borough. This is achieved through a detailed assessment of the national policy context, the characteristics of trends and challenges in land use associated with HMOs in the Borough, and through engagement with relevant stakeholders.

7.2 It is clear that this form of accommodation represents a diverse component of the housing market and plays an unarguable role in meeting housing needs, which is particularly important for Nuneaton and Bedworth given the recognised affordable housing need identified in the HEDNA (2022).

7.3 Differences between places and changing trends over time indicate that solutions appropriate in one area at a given point in time are not capable of being implemented on a like-for-like basis to achieve the same development outcomes.

7.4 Given the changing nature of housing need and the wider housing market it is also the case that individual authorities should adopt an iterative approach to determine appropriate responses to the challenges raised by HMOs.

7.5 Great care should be taken to ensure that measures introducing greater restrictions on land use are based on robust and up-to-date evidence and that the options identified are proportionate and directly related to addressing identified issues. These form key considerations in assessing whether relevant approaches are justified and will be effective when implemented in practice.

b) Context for Managing Challenges Associated with HMOs

7.6 Nuneaton and Bedworth differs from neighbouring authority areas given that its HMOs are not primarily associated with university students and instead are attributed to the local economy, particularly in regard to the healthcare sector.

7.7 While the overall level of HMO accommodation is less significant than in some nearby areas the characteristics of the Borough indicate that demand for HMOs continues to grow, as supported by numerous landlords within the stakeholder engagement sessions.

7.8 There are, however, a number of indicators that suggest these characteristics do not in themselves reveal an immediate pressure for the management of land use through the planning system to significantly alter the process for the development of HMOs.

7.9 Firstly, in relation to the challenges associated with HMOs in Nuneaton and Bedworth there are grounds to state that the nature of perceived issues is unlikely to arise solely or specifically from the use of housing stock as shared accommodation. This relates to the locally diverse nature of those parts of the borough that experience the greatest concentration of HMOs that also correspond to pre-existing issues such as limited availability of off-street parking and other potential factors impacting upon household size and composition.

7.10 Secondly, the local housing market is also likely to play a significant role in establishing a demand for accommodation to be provided in HMOs. The HMO sector appears to play a diverse role in meeting housing needs. Placing restrictions on this element of the housing market is unlikely to have any significant positive impact in making existing single-family property affordable for households in need. Therefore it is important to note that the Council's current approach to housing enforcement for HMO development meets statutory requirements and reflects the role of the HMO sector in meeting current needs.

7.11 Going forward, the context identified and analysed in this report robustly support the need for ongoing monitoring and research regarding the development and growth of HMOs. The initial findings of the study do not, however, identify a close correlation between the circumstances in the Borough compared with those in other authorities that have introduced restrictions as part of their current policies and measures to manage land use. This context has informed the conclusions of this report on the approaches and timeframes that could be taken forward in assessing and development future policy options.

c) Recommendations for Policy Options and Timeframes

7.12 The starting point for this study recognises that the Council's existing development plan does not make dedicated provision for managing the development of HMOs. It is also the case that national policy and guidance provide limited clarity to direct decision-taking on relevant applications.

7.13 Therefore, the **first recommendation** of this report is to ensure that the Council provides a clear route map for monitoring and review of the initial findings in this study in order to inform future policy development.

7.14 It is advised that this takes an inter-departmental approach to ensure that data and findings are pooled together effectively and management of issues is tackled holistically. This will allow early intervention to be achieved and potential problems stemming from HMOs to be tackled early. Therefore, this recommendation ultimately allows the Council to review the findings and consider the following recommendations in light of this study's findings and ongoing monitoring data outcomes.

7.15 It is considered that in light of the Transforming Nuneaton programme likely leading to potential increases in HMO development, this monitoring is important to be able to understand the context of HMOs in the borough in greater detail.

7.16 A focus on these short-term 'non-planning' aspects can form interim actions in the immediate term. This also minimises the risk to the Council of undertaking abortive work on attempts to restrict the development of HMOs without a robust starting point provided for within the development plan.

7.17 The **second recommendation**, is that the Council consider an additional licensing scheme or a selective licensing scheme which only applies to the areas identified as having the highest concentration of HMOs. Whilst it is noted that the Council previously introduced a voluntary HMO Accreditation Scheme which had poor uptake, within the stakeholder sessions licensing arrangements were supported by landlords. It is important to note that this recommendation would need to be subject to consultation with the relevant Council departments, and the resourcing implications of such a scheme would need to be considered as well.

7.18 The **third recommendation**, based on the findings of this report, is that pursuing the removal of Permitted Development Rights for the creation of small HMOs (Use Class C4) is unlikely to be warranted at the current time. This takes specific account of the most recent revisions to the National Planning Policy Framework regarding the use of Article 4 Directions, including paragraph 54 of the NPPF (2024) which states that Article 4 Directions must be based on robust evidence and apply to the smallest geographical area possible. These requirements are also carried forward to the draft NPPF (2025) in draft Policy DM10.

7.19 Given the current context of Nuneaton and Bedworth, it is unlikely that there is robust evidence to justify the removal of Permitted Development Rights on the grounds of overconcentration of HMOs at the present time.

7.20 The **fourth recommendation** relates to the approaches that the Council could consider in terms of policy development. For the purposes of timeframes, it is considered appropriate that the relevant approach is set out in the Council's evidence base and justification of policies in the next Local Plan review. This is recommended to be incorporated as part of the next Local Plan review as opposed to via the development of a SP given the latter could have significant time and resource implications due to requiring its own consultation and examination processes, and may also have more limited scope to influence HMO development trends and issues if not already supported by a currently adopted Local Plan policy.

7.21 This would appear proportionate to the nature and scale of the challenges identified and offers the best prospects for robust and effective policies to inform decision-taking as it will be informed by a robust evidence base and the monitoring data recommended above.

7.22 More widely, the Local Plan represents a comprehensive opportunity to reflect the specific nature of characteristics that are generating land use pressure as a result of demand for HMOs.

7.23 There is likely to be an overlap between the Council's specific policy approach to this topic and the Local Plan's wider provisions on topics such as housing mix and support for economic development going forward. This will reinforce the justification for any policy approach alongside the role the HMOs will continue to play in addressing the housing needs of different groups.

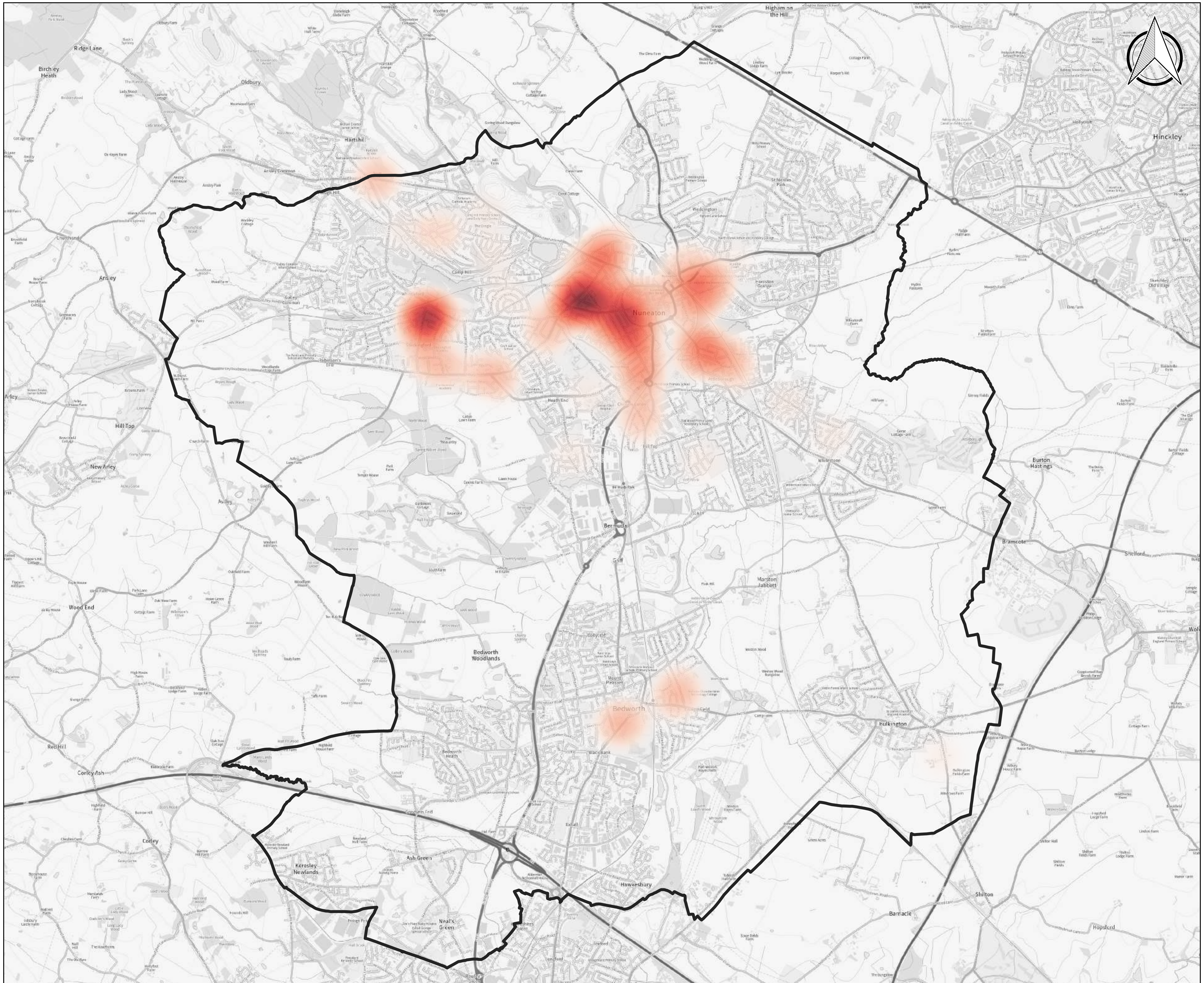
7.24 In regard to policy, it is advised that any such policy wording should focus on an amenity-based approach initially. Given the majority of the issues that are evidenced as arising from HMOs in the borough it is considered appropriate for an amenity-based policy to be utilised. This policy approach could help tackle issues relating to waste, noise and social cohesion. This approach would go hand in hand with Environmental Health and the workload officers have detailed within the stakeholder engagement sessions.

7.25 Alongside this approach, given further monitoring and reviewing is recommended, scope may be available in future Local Plan updates to strengthen this amenity-based approach alongside a density-radius policy should an Article 4 Direction become warranted in the future. It is noted that the combination of these policy approaches typically increases the effectiveness of the policy. Due to the issues reported within this report it is considered that this policy approach can still exist alongside the Permitted Development Rights.

7.26 In order for the Council to be able to justify this approach in the next Local Plan, evidence would need to be compiled to demonstrate that HMO development in the Borough is impacting the stock of family-size housing, leading to amenity-based issues and preventing mixed communities being sustained.

7.27 Therefore, at this point in time it is not considered that there is sufficient evidence to support the introduction of an Article 4 Direction in Nuneaton and Bedworth.

Appendix 1 Heat map showing concentration/distribution of HMOs in Nuneaton and Bedworth



Nuneaton and Bedworth District Boundary

HMO All Locations

High Concentration

Low Concentration

Scale

1:45,000

0 1 2 km

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CLIENT
Nuneaton & Bedworth Borough Council

PROJECT
Borough-wide
HMO Research

DRAWING TITLE
HMO Heat Map

Date 02.06.2026	OS Ref:		Drawn By PMG
Scale 1:45,000 @ A3	Drawing No: D06.1		Checked By AU
Job No: WA5383PS	Rev:		

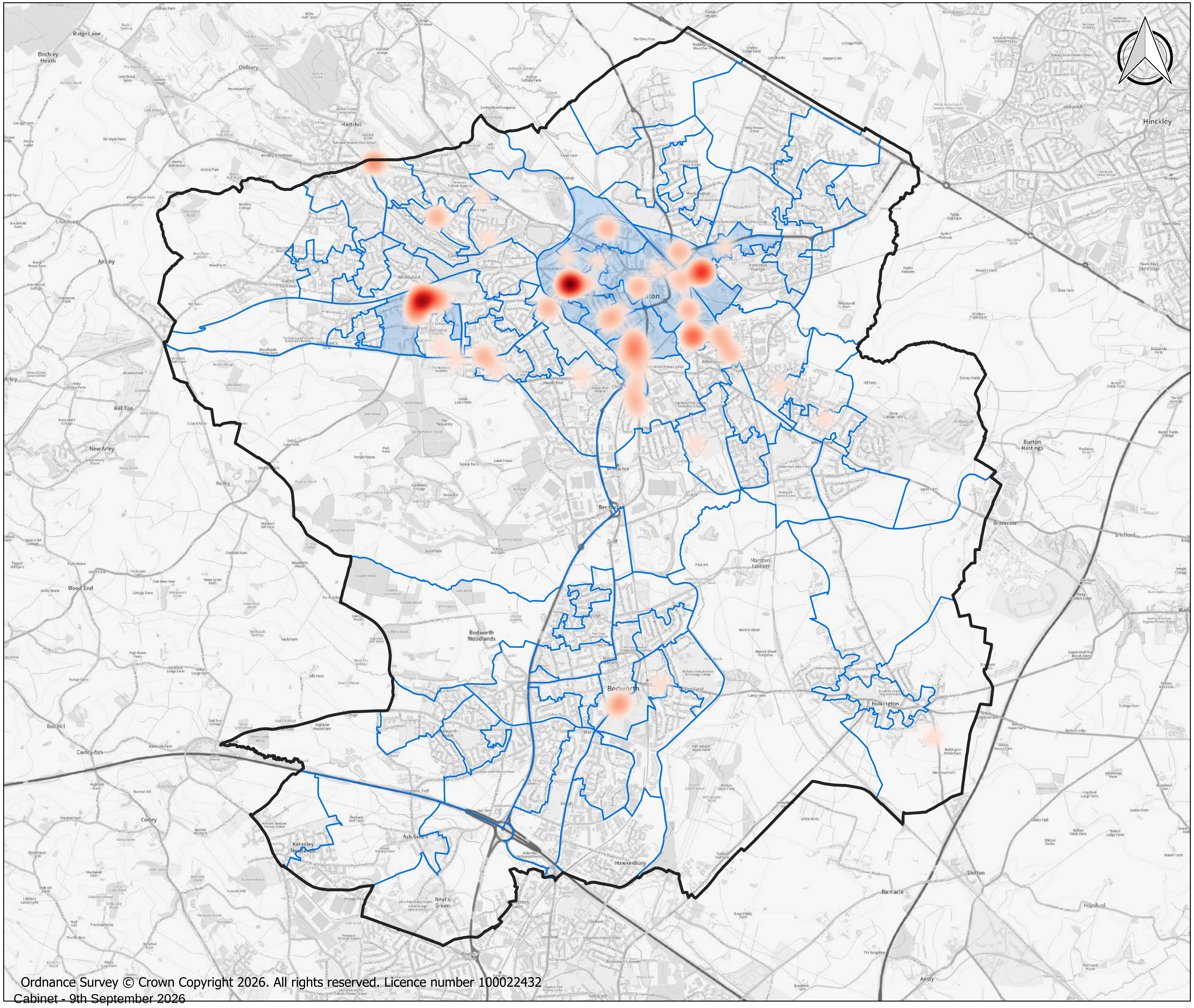
Appendix 2 Density-radius analysis results

Property ID	Number of Properties within 50m radius	Number of HMO Properties within 50m radius	% HMOs within 50m radius	% HMOs within 50m radius (+1 HMO)	Number of Properties within 100m radius	Number of HMO Properties within 100m radius	% HMOs within 100m radius	% HMOs within 100m radius (+1 HMO)	Number of Properties within 250m radius	Number of HMO Properties within 250m radius	% HMOs within 250m radius	% HMOs within 250m radius (+1 HMO)
			Concentrations in excess of 15% highlighted in red, in excess of 10% highlighted in orange				Concentrations in excess of 15% highlighted in red, in excess of 10% highlighted in orange				Concentrations in excess of 15% highlighted in red, in excess of 10% highlighted in orange	
1	67	2	3.0%	4.5%	88	3	3.4%	4.5%	152	3	2.0%	2.6%
2	64	3	4.7%	6.3%	77	3	3.9%	5.2%	153	3	2.0%	2.6%
3	38	2	5.3%	7.9%	110	2	1.8%	2.7%	525	4	0.8%	1.0%
4	35	2	5.7%	8.6%	111	2	1.8%	2.7%	522	4	0.8%	1.0%
5	46	1	2.2%	4.3%	94	1	1.1%	2.1%	391	1	0.3%	0.5%
6	19	1	5.3%	10.5%	75	1	1.3%	2.7%	479	1	0.2%	0.4%
7	23	1	4.3%	8.7%	83	1	1.2%	2.4%	339	1	0.3%	0.6%
8	52	2	3.8%	5.8%	148	2	1.4%	2.0%	477	4	0.8%	1.0%
9	58	2	3.4%	5.2%	190	2	1.1%	1.6%	999	4	0.4%	0.5%
10	52	3	5.8%	7.7%	147	5	3.4%	4.1%	488	6	1.2%	1.4%
11	53	3	5.7%	7.5%	148	5	3.4%	4.1%	490	6	1.2%	1.4%
12	42	1	2.4%	4.8%	91	4	4.4%	5.5%	503	6	1.2%	1.4%
13	49	2	4.1%	6.1%	140	2	1.4%	2.1%	662	2	0.3%	0.5%
14	57	2	3.5%	5.3%	129	2	1.6%	2.3%	704	2	0.3%	0.4%
15	16	1	6.3%	12.5%	9	1	11.1%	22.2%	141	2	1.4%	2.1%
16	35	1	2.9%	5.7%	147	2	1.4%	2.0%	725	3	0.4%	0.6%
17	48	1	2.1%	4.2%	190	2	1.1%	1.6%	999	6	0.6%	0.7%
18	41	1	2.4%	4.9%	133	2	1.5%	2.3%	874	4	0.5%	0.6%
19	30	1	3.3%	6.7%	112	1	0.9%	1.8%	640	3	0.5%	0.6%
20	35	1	2.9%	5.7%	88	3	3.4%	4.5%	290	3	1.0%	1.4%
21	32	1	3.1%	6.3%	93	3	3.2%	4.3%	314	3	1.0%	1.3%
22	35	1	2.9%	5.7%	71	3	4.2%	5.6%	274	3	1.1%	1.5%
23	49	1	2.0%	4.1%	162	1	0.6%	1.2%	743	6	0.8%	0.9%
24	31	1	3.2%	6.5%	96	2	2.1%	3.1%	509	6	1.2%	1.4%
25	41	2	4.9%	7.3%	127	4	3.1%	3.9%	582	11	1.9%	2.1%
26	40	3	7.5%	10.0%	122	3	2.5%	3.3%	581	12	2.1%	2.2%
27	33	2	6.1%	9.1%	111	5	4.5%	5.4%	577	12	2.1%	2.3%
28	49	3	6.1%	8.2%	112	6	5.4%	6.3%	608	12	2.0%	2.1%
29	45	3	6.7%	8.9%	136	7	5.1%	5.9%	634	12	1.9%	2.1%
30	64	3	4.7%	6.3%	101	5	5.0%	5.9%	597	11	1.8%	2.0%
31	25	1	4.0%	8.0%	63	1	1.6%	3.2%	370	4	1.1%	1.4%
32	23	1	4.3%	8.7%	85	1	1.2%	2.4%	420	3	0.7%	1.0%
33	23	1	4.3%	8.7%	81	1	1.2%	2.5%	405	3	0.7%	1.0%
34	48	1	2.1%	4.2%	128	1	0.8%	1.6%	313	3	1.0%	1.3%
35	11	1	9.1%	18.2%	13	1	7.7%	15.4%	172	4	2.3%	2.9%
36	16	2	12.5%	18.8%	37	2	5.4%	8.1%	219	4	1.8%	2.3%
37	36	2	5.6%	8.3%	118	2	1.7%	2.5%	700	3	0.4%	0.6%
38	40	2	5.0%	7.5%	132	2	1.5%	2.3%	723	3	0.4%	0.6%
39	61	1	1.6%	3.3%	173	1	0.6%	1.2%	754	11	1.5%	1.6%
40	46	3	6.5%	8.7%	117	6	5.1%	6.0%	589	12	2.0%	2.2%
41	41	2	4.9%	7.3%	148	4	2.7%	3.4%	619	12	1.9%	2.1%
42	41	2	4.9%	7.3%	150	3	2.0%	2.7%	603	12	2.0%	2.2%
43	40	1	2.5%	5.0%	127	2	1.6%	2.4%	674	11	1.6%	1.8%
44	23	1	4.3%	8.7%	71	1	1.4%	2.8%	359	1	0.3%	0.6%
45	30	4	13.3%	16.7%	101	7	6.9%	7.9%	647	11	1.7%	1.9%
46	45	1	2.2%	4.4%	166	3	1.8%	2.4%	824	10	1.2%	1.3%
47	57	2	3.5%	5.3%	178	2	1.1%	1.7%	900	4	0.4%	0.6%
48	69	2	2.9%	4.3%	172	2	1.2%	1.7%	887	6	0.7%	0.8%
49	33	1	3.0%	6.1%	209	1	0.5%	1.0%	722	6	0.8%	1.0%
50	13	1	7.7%	15.4%	75	1	1.3%	2.7%	548	6	1.1%	1.3%
51	55	1	1.8%	3.6%	174	6	3.4%	4.0%	704	12	1.7%	1.8%
52	65	2	3.1%	4.6%	140	2	1.4%	2.1%	481	4	0.8%	1.0%
53	42	2	4.8%	7.1%	121	2	1.7%	2.5%	440	4	0.9%	1.1%
54	44	1	2.3%	4.5%	113	2	1.8%	2.7%	512	4	0.8%	1.0%
55	42	1	2.4%	4.8%	102	2	2.0%	2.9%	413	2	0.5%	0.7%
56	32	1	3.1%	6.3%	77	1	1.3%	2.6%	351	4	1.1%	1.4%
57	24	1	4.2%	8.3%	86	1	1.2%	2.3%	312	4	1.3%	1.6%

Property ID	Number of Properties within 50m radius	Number of HMO Properties within 50m radius	% HMOs within 50m radius	% HMOs within 50m radius (+1 HMO)	Number of Properties within 100m radius	Number of HMO Properties within 100m radius	% HMOs within 100m radius	% HMOs within 100m radius (+1 HMO)	Number of Properties within 250m radius	Number of HMO Properties within 250m radius	% HMOs within 250m radius	% HMOs within 250m radius (+1 HMO)
			Concentrations in excess of 15% highlighted in red, in excess of 10% highlighted in orange				Concentrations in excess of 15% highlighted in red, in excess of 10% highlighted in orange				Concentrations in excess of 15% highlighted in red, in excess of 10% highlighted in orange	
58	42	2	4.8%	7.1%	116	2	1.7%	2.6%	417	3	0.7%	1.0%
59	23	1	4.3%	8.7%	83	1	1.2%	2.4%	440	1	0.2%	0.5%
60	34	1	2.9%	5.9%	98	1	1.0%	2.0%	487	5	1.0%	1.2%
61	27	1	3.7%	7.4%	54	1	1.9%	3.7%	292	1	0.3%	0.7%
62	47	1	2.1%	4.3%	117	1	0.9%	1.7%	481	4	0.8%	1.0%
63	38	1	2.6%	5.3%	146	1	0.7%	1.4%	673	6	0.9%	1.0%
64	38	2	5.3%	7.9%	95	4	4.2%	5.3%	554	8	1.4%	1.6%
65	42	3	7.1%	9.5%	105	4	3.8%	4.8%	559	8	1.4%	1.6%
66	42	2	4.8%	7.1%	105	4	3.8%	4.8%	560	6	1.1%	1.3%
67	34	1	2.9%	5.9%	75	1	1.3%	2.7%	310	3	1.0%	1.3%
68	52	1	1.9%	3.8%	147	4	2.7%	3.4%	518	6	1.2%	1.4%
69	20	1	5.0%	10.0%	84	1	1.2%	2.4%	497	1	0.2%	0.4%
70	37	1	2.7%	5.4%	108	2	1.9%	2.8%	638	7	1.1%	1.3%
71	51	2	3.9%	5.9%	143	3	2.1%	2.8%	645	12	1.9%	2.0%
72	51	2	3.9%	5.9%	148	3	2.0%	2.7%	649	12	1.8%	2.0%
73	18	3	16.7%	22.2%	111	7	6.3%	7.2%	676	11	1.6%	1.8%
74	43	4	9.3%	11.6%	116	8	6.9%	7.8%	695	12	1.7%	1.9%
75	43	6	14.0%	16.3%	118	8	6.8%	7.6%	724	12	1.7%	1.8%
76	40	5	12.5%	15.0%	108	7	6.5%	7.4%	719	11	1.5%	1.7%
77	38	5	13.2%	15.8%	108	7	6.5%	7.4%	712	11	1.5%	1.7%
78	44	1	2.3%	4.5%	138	3	2.2%	2.9%	598	6	1.0%	1.2%
79	62	1	1.6%	3.2%	129	1	0.8%	1.6%	900	10	1.1%	1.2%
80	50	2	4.0%	6.0%	157	2	1.3%	1.9%	856	9	1.1%	1.2%
81	53	2	3.8%	5.7%	152	2	1.3%	2.0%	894	9	1.0%	1.1%
82	38	1	2.6%	5.3%	159	2	1.3%	1.9%	920	10	1.1%	1.2%
83	44	5	11.4%	13.6%	67	5	7.5%	9.0%	266	6	2.3%	2.6%
84	43	5	11.6%	14.0%	68	5	7.4%	8.8%	265	5	1.9%	2.3%
85	45	5	11.1%	13.3%	69	5	7.2%	8.7%	251	5	2.0%	2.4%
86	45	5	11.1%	13.3%	72	5	6.9%	8.3%	242	5	2.1%	2.5%
87	44	5	11.4%	13.6%	81	5	6.2%	7.4%	238	5	2.1%	2.5%
88	26	2	7.7%	11.5%	42	2	4.8%	7.1%	195	3	1.5%	2.1%
89	26	2	7.7%	11.5%	42	2	4.8%	7.1%	195	3	1.5%	2.1%
90	13	1	7.7%	15.4%	45	1	2.2%	4.4%	286	1	0.3%	0.7%
91	38	1	2.6%	5.3%	91	1	1.1%	2.2%	407	4	1.0%	1.2%
92	34	3	8.8%	11.8%	149	5	3.4%	4.0%	511	6	1.2%	1.4%
93	26	1	3.8%	7.7%	66	3	4.5%	6.1%	690	9	1.3%	1.4%
94	73	4	5.5%	6.8%	138	4	2.9%	3.6%	645	7	1.1%	1.2%
95	73	4	5.5%	6.8%	155	4	2.6%	3.2%	690	7	1.0%	1.2%
96	71	4	5.6%	7.0%	160	5	3.1%	3.8%	695	7	1.0%	1.2%
97	42	1	2.4%	4.8%	128	1	0.8%	1.6%	560	4	0.7%	0.9%
98	62	1	1.6%	3.2%	157	1	0.6%	1.3%	830	14	1.7%	1.8%
99	19	1	5.3%	10.5%	86	1	1.2%	2.3%	300	1	0.3%	0.7%
100	30	1	3.3%	6.7%	127	1	0.8%	1.6%	838	4	0.5%	0.6%
101	51	1	2.0%	3.9%	117	1	0.9%	1.7%	473	5	1.1%	1.3%
102	55	1	1.8%	3.6%	129	3	2.3%	3.1%	535	5	0.9%	1.1%
103	42	1	2.4%	4.8%	132	2	1.5%	2.3%	626	8	1.3%	1.4%
104	33	1	3.0%	6.1%	106	2	1.9%	2.8%	706	7	1.0%	1.1%
105	45	1	2.2%	4.4%	132	1	0.8%	1.5%	648	3	0.5%	0.6%
106	30	1	3.3%	6.7%	104	1	1.0%	1.9%	554	1	0.2%	0.4%
107	14	1	7.1%	14.3%	58	1	1.7%	3.4%	249	1	0.4%	0.8%
108	37	1	2.7%	5.4%	115	1	0.9%	1.7%	512	3	0.6%	0.8%
109	29	1	3.4%	6.9%	103	1	1.0%	1.9%	314	4	1.3%	1.6%
110	44	1	2.3%	4.5%	119	1	0.8%	1.7%	622	8	1.3%	1.4%
111	55	1	1.8%	3.6%	120	3	2.5%	3.3%	657	7	1.1%	1.2%
112	50	2	4.0%	6.0%	151	2	1.3%	2.0%	496	4	0.8%	1.0%
113	49	2	4.1%	6.1%	146	2	1.4%	2.1%	490	4	0.8%	1.0%
114	33	1	3.0%	6.1%	99	1	1.0%	2.0%	461	3	0.7%	0.9%

Property ID	Number of Properties within 50m radius	Number of HMO Properties within 50m radius	% HMOs within 50m radius	% HMOs within 50m radius (+1 HMO)	Number of Properties within 100m radius	Number of HMO Properties within 100m radius	% HMOs within 100m radius	% HMOs within 100m radius (+1 HMO)	Number of Properties within 250m radius	Number of HMO Properties within 250m radius	% HMOs within 250m radius	% HMOs within 250m radius (+1 HMO)
			Concentrations in excess of 15% highlighted in red, in excess of 10% highlighted in orange				Concentrations in excess of 15% highlighted in red, in excess of 10% highlighted in orange				Concentrations in excess of 15% highlighted in red, in excess of 10% highlighted in orange	
115	33	1	3.0%	6.1%	105	1	1.0%	1.9%	639	1	0.2%	0.3%
116	12	2	16.7%	25.0%	26	2	7.7%	11.5%	168	4	2.4%	3.0%
117	40	1	2.5%	5.0%	129	2	1.6%	2.3%	588	5	0.9%	1.0%
118	45	3	6.7%	8.9%	111	5	4.5%	5.4%	651	11	1.7%	1.8%
119	44	6	13.6%	15.9%	148	8	5.4%	6.1%	816	12	1.5%	1.6%
120	20	2	10.0%	15.0%	84	2	2.4%	3.6%	371	2	0.5%	0.8%
121	37	1	2.7%	5.4%	135	1	0.7%	1.5%	639	1	0.2%	0.3%
122	44	2	4.5%	6.8%	128	2	1.6%	2.3%	485	4	0.8%	1.0%
123	40	1	2.5%	5.0%	124	1	0.8%	1.6%	599	4	0.7%	0.8%
124	22	2	9.1%	13.6%	84	2	2.4%	3.6%	365	2	0.5%	0.8%
125	58	2	3.4%	5.2%	221	3	1.4%	1.8%	677	3	0.4%	0.6%
126	73	4	5.5%	6.8%	184	4	2.2%	2.7%	855	7	0.8%	0.9%
127	3	1	33.3%	66.7%	16	1	6.3%	12.5%	51	1	2.0%	3.9%

Appendix 3 Heat map showing areas which exceed 10% and 15% concentration within 50m (including +1 HMO)



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CLIENT
Nuneaton & Bedworth Borough Council

PROJECT
Borough-wide
HMO Research

DRAWING TITLE
Map 3
Properties Exceeding 10% and 15% Concentration within 50M
(Including +1 HMO)

Date	02.06.2026	OS Ref:		Drawn By	PMG
Scale	1:45,000 @ A3	Drawing No:	Map 3	Checked By	AU
Job No:	WA5383PS	Rev:			

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RTPI Chartered Town Planners

Established in 1991

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Nuneaton & Bedworth
United to Achieve

Name of Policy/Procedure/Service	Cabinet report, 9 September 2026 – Houses in Multiple Occupation: introduction of additional HMO licensing and selective licensing, current position and next steps regarding an Article 4 Direction. This screening covers the decisions sought by that report, not the licensing schemes themselves.
Service Unit	Environment and Enforcement, and Planning
Date of Implementation	September 2026, subject to call-in. The decisions sought are the commissioning of evidence, a non-statutory survey, approval in principle of licensing subject to statutory consultation, and the development of an option for a community presence and engagement function.

Does this policy/procedure/service have any differential impact on the following groups/people? (please tick):

Group	This may have a positive impact	This may have a negative impact	No adverse impact
Age		X	
Disability		X	
Gender			X
Gender Reassignment			X
Marriage and Civil Partnership			X
Pregnancy and Maternity			X
Race – which includes ethnic or national origins, colour, caste or nationality		X	
Religion or Belief – this also includes no religion/belief		X	
Sexual Orientation (Including LGBT)			X
impact on Serving and/or Ex Serving Armed Forces Personnel and their families			X

Please tick if you believe that this document:

Should proceed to a Full Impact Assessment	☐	Red
Needs some minor changes, but does not need a Full Impact Assessment	X	Amber
Needs no further action	☐	Green

Recommendations (If any):

This screening covers the decisions sought by the report: consolidation of Council held data and a partner-led evidence gathering exercise; a non-statutory public survey; approval of a capped spend envelope; approval in principle of additional HMO licensing and selective licensing, subject to statutory consultation and a further decision; and the development, for a future report, of an option for a community presence and engagement function in the areas of highest HMO concentration.

The differential effects of a licensing scheme itself, in particular the incidence of licence fees and the benefit of licence conditions, arise on designation and not on these decisions. They will be assessed in full, with fee modelling, in the assessment accompanying the designation report.

Three impacts arise from the decisions before Cabinet. First, the non-statutory survey. If it is issued online only, in English only and without accessible formats, responses will under-represent older residents, disabled residents and residents whose first language is not English, and the evidence base built on it will be correspondingly weaker. Second, the representations and the associated debate. Part of the stock in question is used as dispersed asylum accommodation, and framing by reference to the occupants of that accommodation rather than to the arrangements for its procurement and management would engage the duty to foster good relations under section 149 of the Equality Act 2010. Third, the development of an option for a community presence and engagement function at recommendation 2.7. A function deployed in the areas where dispersed asylum accommodation is concentrated could be perceived as, or could become, a function directed at the occupants of that accommodation by reference to a protected characteristic, in particular race, nationality or national origins, or religion or belief. No such function is established by this report and no cost is approved by it. Mitigations. The survey to be available in paper as well as online, in accessible formats on request, with translation available, promoted through advice agencies and community organisations as well as through Council channels, and response rates monitored by ward and by respondent characteristics so that gaps are visible in the analysis. The report, the debate and any associated communications to be framed by reference to accommodation type and procurement rather than occupants, with a member briefing on the section 149 duty before the meeting. Any community presence and engagement function to be developed on the basis that deployment is determined by area and by incident data only, with written operating instructions, training on the Equality Act 2010, recording of all reports to the accommodation contractor by reference to conduct, and communications describing the function by reference to the areas served and the services provided. The evidence gathering and the capped spend envelope have no differential impact on any protected characteristic. The approval in principle has none at this stage because it commits the Council only to taking the proposals through the statutory process. Conclusion. The impacts identified are capable of being managed through the mitigations above and a full impact assessment is not required for these decisions. A full impact assessment will be required for, and will accompany, the designation report, and any report seeking approval of a community presence and engagement function.

Signed	*Alastair Blunkett*
Officer completing assessment	Alastair Blunkett
Date	27.8.26

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 13

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	9th September 2026
Subject:	General Fund Budget Monitoring Quarter 1 2026/27
Portfolio:	Finance, Enabling Services and Communities
Responsible Officer:	Assistant Director - Finance

Corporate Plan – Theme: Your Council

Corporate Plan – Aim: Deliver continued forward financial planning to safeguard the finances of the Council

Ward Relevance: All

Amendment to Budget: No   Council Tax Related: No

Recommendation to Council/Cabinet/Committee: No

Forward Plan: Yes

Subject to Call-in: Yes

1. Purpose of report

1.1. To present the forecast revenue outturn position for the General Fund as at 30th June 2026 unless otherwise stated in the report.

2. Recommendations

2.1. That the forecast outturn position for the General Fund for 2026/27 be noted, with consideration given to key variances.

2.2. To recommend to Council an update to the budget for reasons outlined in section 4.

3. Body of report

3.1. Apart from Council housing, day-to-day revenue income and expenditure for Council services is accounted for through the General Fund. The net expenditure is financed through the Council's Core Spending Power which includes Council Tax, Retained Business Rates and other general Government Grants.

3.2. The revenue budget for 2026/27 was set as a net expenditure of £23,838,704 with core income expected of £23,849,460 resulting in a minor surplus of £10,756. Currently there are forecasted pressures and savings which are resulting in a favourable variance to the approved budget.

3.3. The tables have been updated to reflect the changes to portfolio's following the annual Council meeting which was held on the 13th May 2026. This report does not contain the changes following the by-election for Camp Hill in July as it was after the 30th June 2026. These changes will take effect in the quarter 2 update.

3.4. A summary of the Council's budget and forecasted expenditure is contained in the following table with more detail included in Appendix 1.

	Forecast £	Approved Budget £	Variance £
Town Centre Regeneration and Business Development	1,164,941	1,172,154	(7,213)
Finance, Enabling Services and Communities	9,011,346	9,057,437	(46,091)
Leisure and Health	4,594,996	4,513,833	81,163
Planning, Enforcement and Public Services	10,180,221	10,330,803	(150,582)
Housing	162,137	161,594	543
Portfolio Total	25,113,641	25,235,821	(122,180)
Other Operating Costs/Income	(1,400,329)	(1,397,117)	(3,212)
Core Funding	(23,849,460)	(23,849,460)	0
Total (Surplus) / Deficit	(136,148)	(10,756)	(125,392)

3.5. The key variances are included below with commentary:

	£'000
Additional Vehicle Hire costs	205
Reduced Leisure income	45
Additional Utility Costs	38
Vacancy Savings net of Agency	(244)
Delay in implementing food waste	(104)

Additional Recycling Rebate income	(50)
Software Implementation no longer required	(9)
Additional Markets Income	(7)
Minor Variances	1
	(125)

Spend Pressures

3.6. Due to delays with the delivery of the new refuse vehicles the Council has had to incur vehicle hire costs for the continuation of bin collections.

3.7. As a result of the delay in handover for the pitch facilities at Bedworth Physical Activity Hub, the Council are anticipating a pressure of £45k. These are expected to be handed over to the leisure operator January 2027.

3.8. Additional costs for utilities are driven by a delay in installing PV panels at the Pingles Leisure centre and minor costs for business rates and utilities for properties.

Savings

3.9. Anticipated vacancy savings net of agency costs across various service areas are expected to be approximately £244k for the year.

3.10. A delay in delivering food waste collections has resulted in an underspend of £104k for 2026/27.

3.11. Due to the market for recycling materials, the Council has received higher than budgeted recycling rebate income.

3.12. A budgeted requirement for one-off costs in relation to the implementation of a system is no longer required causing a small underspend of £9k.

3.13. Additional markets income as a result of more traders than anticipated has created a minor variance.

4. Financial Implications

4.1. Contained throughout the report.

Budget Updates

4.2. Following the notification of an Assistant Director leaving, there is a need to backfill the role temporarily whilst trying to recruit a more permanent replacement. This is expected to go on for no longer than 5 months.

4.3. The cost of the temporary replacement is anticipated to be £70k. The budget will be adjusted following approval for the funding to come from the planning for the future earmarked reserve.

Public Practice Grant Funding

4.4. An expression of interest for a funded salary support programme was approved 29th June 2026 to expand the capacity of planning teams within the Council.

4.5. Following the Delegated Authority by officers published on the 9th July 2026 the budget will be adjusted for the 2 sets of £40k funding allocated to the Council.

5. Legal Implications

5.1. No specific legal implications have been identified.

6. Equalities implications

6.1. A review has been undertaken, and it has been identified that no assessment is required following consultation and liaison with the appropriate officer.

7. Health implications

7.1. No specific health implications have been identified following the completion of an impact assessment.

8. Climate and environmental implications

8.1. No specific climate and environmental implications have been identified.

9. Section 17 Crime and Disorder Implications

9.1. No direct Section 17 crime and disorder implications have been identified.

10. Risk management implications

10.1. The financial risk register is updated on an annual basis as part of the budget setting reports. The current financial risks were included within the General Fund Revenue Budget 2026/27 Budget Report under Appendix D presented to Cabinet and Council on the 25th February 2026.

11. Human resources implications

11.1. No direct human resource implications have been identified.

12. Biodiversity Implications

12.1. No direct biodiversity implications have been identified.

13. Local Government Reorganisation (LGR) Implications

13.1. No direct LGR implications have been identified.

14. Options considered and reason for their rejection

14.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	Not applicable as the report is to note the forecast position.

15. Conclusion

15.1. Early pressures have been mitigated through vacancy savings, additional income and delay in delivering food waste is resulting in a potential underspend in year.

15.2. Careful consideration of financial risks is key to remain financially sustainable, and a transformation strategy is in development to identify longer term savings.

16. Appendices

16.1. Appendix 1 – General Fund Forecast 2026/27

17. Background Papers

17.1. General Fund Revenue Budget 2026/27 reported February 2026

17.2. Delegated Authority by officer re: Public Practice Planning Policy Grant Funding Salary Support – 9th July 2026

17.3. Delegated Authority by officer re: Public Practice Development Control Grant Funding Salary Support – 9th July 2026

18. Report Writer Details:

Officer Job Title: Assistant Director – Finance

Officer Name: Liam Brown

Appendix 1

SUMMARY GENERAL FUND FORECAST OUTTURN

as at end of June 2026

	2026/27 Current Budget £	2026/27 Current Forecast £	2026/27 Forecast Variance £	Key Reason for Forecast Variance to Budget
Town Centre Regeneration and Business Development	1,172,154	1,164,941	(7,213)	Overspends on utilities and business rates are offset by vacancy savings and additional markets income.
Finance, Enabling Services and Communities	9,057,437	9,011,346	(46,091)	Underspend anticipated due to vacancy savings and an underspend in relation to a software implementation which is no longer required.
Leisure and Health	4,513,833	4,594,996	81,163	Expected overspends due to reduced income from a delay in handing over pitch facilities at Bedworth Physical Activity Hub and additional electricity costs from a delay in installing PV panels at the Pingles.
Planning, Enforcement and Public Services	10,330,803	10,180,221	(150,582)	Large vacancy savings, increased recycling rebates during Q1 and the delay in implementing food waste are partially offset by the increase hire vehicle costs whilst waiting for delivery of new refuse vehicles.
Housing	161,594	162,137	543	Minor variance.
Portfolio Total	25,235,821	25,113,641	(122,180)	
Central Provisions	636,591	633,379	(3,212)	
Depreciation & Impairment	(3,169,390)	(3,169,390)	0	

Contributions To/From Reserves	(1,435,806)	(1,435,806)	0	
Financing of Capital Expenditure	1,125,000	1,125,000	0	
PWLB Premiums	21,120	21,120	0	
Investment Income	(458,820)	(458,820)	0	
Minimum Revenue Provision	828,862	828,862	0	
External Interest	1,055,326	1,055,326	0	
Total Council Net Expenditure	23,838,704	23,713,312	(125,392)	
Council Tax	(11,565,945)	(11,565,945)	0	
New Homes Bonus	0	0	0	
General Government Grants	(6,879,184)	(6,879,184)	0	
Business Rates Retention	(5,303,229)	(5,303,229)	0	
NDR Collection Fund (Surplus)/ Deficit	0	0	0	
Council Tax Collection Fund (Surplus)/ Deficit	(101,102)	(101,102)	0	
Total Funding	(23,849,460)	(23,849,460)	0	
(Surplus) / Deficit	(10,756)	(136,148)	(125,392)	

Nuneaton & Bedworth
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AGENDA ITEM NO. 14

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	9th September 2026
Subject:	Housing Revenue Account Budget Monitoring Quarter 1 2026/27
Portfolio:	Housing and Finance, Enabling Services and Communities
Responsible Officer:	Assistant Director - Finance
Corporate Plan – Theme:	Housing, Health and Communities and Your Council
Corporate Plan – Aim:	Facilitate warm, safe, sustainable and affordable housing Deliver continued forward financial planning to safeguard the finances of the Council
Ward Relevance:	All

Amendment to Budget: No   Council Tax Related: No

Recommendation to Council/Cabinet/Committee: No

Public or Private:	Public
Forward Plan:	Yes
Subject to Call-in:	Yes

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1. Purpose of report

1.1. To present the forecast revenue outturn position for the Housing Revenue Account (HRA) as at 30th June 2026 unless otherwise stated in the report.

2. Recommendations

2.1. That the forecast outturn position for the HRA for 2026/27 be noted, with consideration given to key variances.

3. Body of report

3.1. The Council is required to account separately for income and expenditure in providing council housing.

3.2. The revenue budget for 2026/27 was set as a net surplus of £181. The Council is currently predicting a net surplus of £61,250 which is an underspend position.

3.3. A summary of the HRA's budget and forecasted expenditure is contained in the following table with more detail included in Appendix 1.

	Forecast £	Approved Budget £	Variance £
Income	(33,312,568)	(33,387,118)	74,550
Supervision & Management	12,066,965	12,144,561	(77,596)
Repairs & Maintenance	7,253,247	7,311,270	(58,023)
Capital Financing Costs	13,609,319	13,609,319	0
Appropriations	321,787	321,787	0
Other Operating Costs/Income	0	0	0
Total	(61,250)	(181)	(61,069)

3.4. The key variances are included below with commentary:

	£'000
Reduced income from void properties	558
Additional costs in relation to cleaning contract	95
Additional fire safety requirements	33
Disrepair claims	30
Additional utility costs	5
Additional service charge income	(484)
Vacancy savings	(297)
Minor Variances	(1)
	(61)

Spend Pressures

3.5. Void properties are higher than anticipated, therefore a reduction in expected income for Council dwellings is anticipated.

3.6. New rates for the cleaning contract were agreed once the budget had been set for 2026/27 which is causing a spend pressure during the year.

3.7. Additional fire safety requirements are causing additional costs with repairs and maintenance. These are necessary to ensure the Council maintains compliance.

3.8. Due to the volume of disrepair claims from tenants the Housing Revenue Account is experiencing additional costs in relation to compensation payments.

3.9. There is a minor variance on utility costs for Housing Revenue Account assets.

Savings

3.10. Post 2026/27 budget setting a number of restructures have been approved to be implemented within the Housing Revenue Account. This is resulting in a large amount of vacancy savings.

3.11. After a review of the budget assumptions for service charges in comparison to actuals there is an anticipated favourable variance. This will be reviewed for 2027/28 budget setting to ensure the assumptions are closely aligned to actual data.

4. Financial Implications

4.1. Contained throughout the report.

5. Legal Implications

5.1. No specific legal implications have been identified.

6. Equalities implications

6.1. A review has been undertaken, and it has been identified that no assessment is required following consultation and liaison with the appropriate officer.

7. Health implications

7.1. No specific health implications have been identified following the completion of an impact assessment.

8. Climate and environmental implications

8.1. No specific climate and environmental implications have been identified.

9. Section 17 Crime and Disorder Implications

9.1. No direct Section 17 crime and disorder implications have been identified.

10. Risk management implications

10.1. The HRA faces significant risks not only from inflationary pressures and the loss of dwellings through Right to Buy, but another area creating financial stress are regulatory changes.

11. Human resources implications

11.1. No direct human resource implications have been identified.

12. Biodiversity Implications

12.1. No direct biodiversity implications have been identified.

13. Local Government Reorganisation (LGR) Implications

13.1. No direct LGR implications have been identified.

14. Options considered and reason for their rejection

14.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	Not applicable as the report is to note the forecast position.

15. Conclusion

15.1. Spend pressures arising from losses of income for dwellings rents and additional contract costs are impacting day-to-day operation of the HRA, as reliance on vacancy savings to offset overspends is not sustainable long-term.

15.2. A review of the HRA Business Plan is due to begin which will lay out future plans for income generation and cost mitigation. When finalised, the Business Plan will be presented to Cabinet.

16. Appendices

16.1. Appendix 1 – HRA Forecast 2026/27

17. Background papers

17.1. Housing Revenue Account Budget 2026/27 - Cabinet February 2026

17.2. General Fund Revenue Budget 2026/27 – Appendix D – Cabinet / Council February 2026

18. Report Writer Details:

Officer Job Title: Assistant Director - Finance

Officer Name: Liam Brown

HRA FORECAST OUTTURN
as at end of June 2026

Service	2026/27 Current Budget £	2026/27 Current Forecast £	2026/27 Forecast Variance £	Comments
HRA General Expenses	4,929,343	4,849,052	(80,291)	Vacancy savings following the customer accounts team re-structure are anticipated in year.
HRA Repairs Management	2,188,520	2,143,050	(45,470)	Vacancy savings are partially mitigated by increased levels of disrepair claims.
Resident Involvement	48,660	48,660	0	
Debt Management Costs	224,537	224,537	0	
Increase in bad debt provision	415,360	415,360	0	
HRA share of Corporate and Democratic Core	0	0	0	
HRA share of non-distributed costs	0	0	0	
Housing System	224,210	197,781	(26,429)	Salary savings anticipated.
Development Strategy	171,440	188,450	17,010	Increased salary costs following a re-structure.
SUPERVISION & MANAGEMENT - GENERAL	8,202,070	8,066,890	(135,180)	
HRA Special Expenses	90,886	95,886	5,000	Increased utility costs.
Warden Assisted Schemes	2,593,417	2,646,000	52,583	Vacancy savings are offset by additional cleaning costs.
Homeless Hostels	65,611	65,611	0	
Spitalfields House - Bedworth	76,185	76,185	0	
ST Benedicts House	62,617	62,617	0	
Other Housing Schemes	683,994	683,995	1	
Grounds Maintenance	369,781	369,781	0	
SUPERVISION & MANAGEMENT - SPECIAL	3,942,491	4,000,075	57,584	
Reactive Repairs	2,712,000	2,628,859	(83,141)	Vacancy savings are anticipated.
Call Out	90,990	83,108	(7,882)	Vacancy savings are anticipated.
R.+ M. - Dwellings	419,000	419,000	0	
R. + M. - Estate Management	24,000	24,000	0	

Asbestos	290,000	290,000	0	
R. + M. - Homeless Hostels	7,460	7,460	0	
R. + M. - Shops & Other Co.	30,000	30,000	0	
Planned Works - Outside Contractors	2,491,490	2,524,490	33,000	Additional costs for new fire safety requirements.
Water & Energy Service Outside Contracts	489,500	489,500	0	
R + M - Voids	756,830	756,830	0	
REPAIRS & MAINTENANCE	7,311,270	7,253,247	(58,023)	
Depreciation	11,477,000	11,477,000	0	
Interest Payable	2,132,319	2,132,319	0	
CAPITAL FINANCING COSTS	13,609,319	13,609,319	0	
Dwelling Rents H.R.A	(30,393,001)	(29,834,845)	558,156	Reduced dwelling income caused by void properties.
Interest Receivable	(80,680)	(80,680)	0	
Non-Dwelling Rents	(610,099)	(725,689)	(115,590)	Increased service charge income.
Other Income - Independent Living Schemes	(1,554,074)	(1,910,393)	(356,319)	Increased service charge income.
Other Income - General Purpose Schemes	(726,516)	(738,213)	(11,697)	Increased service charge income.
Other Income - Rechargeable Repairs	(22,748)	(22,748)	0	
INCOME	(33,387,118)	(33,312,568)	74,550	
Appropriations to / (from) MRR	0	0	0	
Employee Benefits	321,787	321,787	0	
Capital Expenditure funded by HRA (CERA)	200,000	200,000	0	
Appropriations to/ (from) Revenue Reserves	(200,000)	(200,000)	0	
APPROPRIATIONS	321,787	321,787	0	
Total HRA (Surplus) / Deficit	(181)	(61,250)	(61,069)	

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 15

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	9th September 2026
Subject:	Capital Monitoring Quarter 1 2026/27
Portfolio:	Finance, Enabling Services and Communities
Responsible Officer:	Assistant Director - Finance

Corporate Plan – Theme: Your Council

Corporate Plan – Aim: Deliver continued forward financial planning to safeguard the finances of the Council

Ward Relevance: All

Amendment to Budget: Yes   Council Tax Related: No

Recommendation to Council/Cabinet/Committee: Yes

Forward Plan: Yes

Subject to Call-in: Yes

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1. Purpose of report

1.1. To update on the Council's Q1 forecasted outturn position on capital expenditure for both the General Fund and Housing Revenue Account (HRA).

2. Recommendations

2.1. To consider the Q1 forecasted capital outturn position for 2026/27 for the General Fund and HRA.

2.2. To recommend to Council an update to the budget for projects as outlined in section 5.

3. Background

3.1. Nuneaton and Bedworth Borough Council has a large capital programme to provide community value and improve facilities. The Q1 outturn position for 2026/27 updates on how the programme is progressing.

4. Body of report

4.1. The Council's capital programme covers many projects for both the General Fund and Housing Revenue Account.

4.2. General Fund projects are developed in line with strategies reported to Cabinet/Council and are funded through Section 106 developer contributions, grant funding (from the Government and other external providers), internal and external borrowing plus capital receipts generated through asset sales.

4.3. HRA projects are mainly for refurbishment of council houses, disabled adaptations to council housing plus new build. They are funded from HRA reserves, capital receipts from Right to Buy plus grant income.

4.4. The capital budget for 2026/27 of £31,276,720 was approved in February 2026 with further updates being approved March 2026 and April 2026, resulting in the current budget £33,120,720.

4.5. The outturn position was reported to Cabinet in July and the proposed carry forwards are included in the table below taking the budget to £42,601,699.

4.6. A summary of the General Fund and HRA forecasted expenditure versus budget is below alongside financing of the programme with further detail included in Appendix 1.

	Approved Budget £	Proposed Carry Forward £	Total Budget £	Forecast Actual £	Variance £
Town Centre Regeneration and Business Development	3,107,307	4,241,970	7,349,277	5,438,332	(1,910,945)
Enabling Services and Communities	100,000	250,736	350,736	350,736	0
Leisure and Health	5,410,082	1,447,284	6,857,366	6,820,124	(37,242)
Housing	7,899,027	131,188	8,030,215	8,030,215	0
Planning, Enforcement and Public Services	2,007,413	551,079	2,558,492	2,024,951	(533,541)
Capital General	50,000	0	50,000	0	0
General Fund	**18,573,829**	**6,622,257**	**25,196,086**	**22,664,358**	**(2,481,728)**
HRA	**14,546,891**	**2,858,722**	**17,405,613**	**17,405,613**	**0**
Total	**33,120,720**	**9,480,979**	**42,601,699**	**40,069,971**	**(2,481,728)**

General Fund

4.7. The majority of the 2026/27 Capital Programme is progressing in line with the approved plan.

4.8. There are three projects in Town Centre Regeneration and Business Development that are committed in full but expected to be complete during 2027/28. These budgets will be carried forward. Funding through Government grants for these projects is still within the timeframe for completion. If projects are completed alongside the original grant approval, the funds are available until March 2028.

4.9. Three refuse freighters have been ordered due to the aging fleet and cost of repairs and vehicle hire. There is a surplus budget of just over £500k but this is required to fund further necessary acquisitions. The available funding is being considered, and any outstanding budget will be carried forward.

4.10. Coronation Walk Footpath/Cycleway is due to start in quarter 4 and will run into early 2027/28. The budget will be carried forward.

HRA

4.11. The HRA is reported in quarter 1 to be on target. There is however significant work currently being undertaken to review both revenue and capital budgets after feedback from the Regulator for Social Housing.

4.12. Any alterations to major planned works will be reported to Cabinet and Council in quarter 2.

Capital Reserves

4.13. Reserves are held by the Council for capital purposes either generated through sales of assets, setting aside sums from underspends or receipts of grants for capital purposes.

4.14. The Council's capital reserve position at the end of March 2026 is as follows.

	2025/26 £
Capital Receipts	622,010
Capital Grants	6,348,771
Earmarked Reserves	5,727,862

GF Total	12,698,643
Capital Receipts	3,279,209
1-4-1 Receipts	6,071,289
Earmarked Capital	3,773,387
Major Repairs Reserve	2,780,933
HRA Total	15,904,818
Total Capital Resources	28,603,461

4.15. Capital reserves are allocated against specific projects with no residual unallocated amount available. This poses risks to any movement in the projected capital expenditure as there is nothing available to cover any fluctuations in expenditure.

5. Budget Updates

General Fund

Selby Way Bridge

5.1. The bridge located on Selby Way needs repair; without the repairs the bridge would need to be condemned. This is currently on a desired footpath for children to walk to school and poses a risk to the public if the necessary works are not completed.

5.2. It is proposed to fund the £216k repair via the bridge maintenance earmarked reserve. There are currently sufficient funds available within this earmark reserve to cover the project.

Cemetery Works

5.3. Previously solutions to the Lawn Burial Provision were reported to Environment and Leisure Overview and Scrutiny Panel on the 26th March 2026 and it was resolved at Cabinet 22nd April 2026 that £95k of funding would be allocated for works at Bucks Hill and Oaston Road Cemeteries to deliver additional lawn burial plots.

5.4. Funding has been identified with the proposal to utilise £50k of from the Capital General budget which is available for miscellaneous projects with the additional £45k being reallocated from the General Fund revenue budget for climate and sustainability to the cemetery work via a revenue contribution to capital.

Pride In Place

5.5. Phase 1 of the Pride in Place Programme saw Bedworth chosen to shape their future via setting up a neighbourhood board and submitting a plan to spend the allocated funding over the next 10 years. The Council is the administering body for the funding.

5.6. To date we have received £360k for the Pride in Place Bedworth Plan and subsequently the capital programme needs to be updated to track spend against the allocated funding.

Chamber AV Project

5.7. Previously a revenue budget was added for the upgrading of the audio and visual devices within the Council Chamber. The project is to be delivered during 2026/27 and the project should be delivered through the capital programme.

5.8. The recommendation is to update the capital programme with an £100k budget to deliver the project. This funding will be split £50k via earmarked reserves set a-side for the upgrade and £50k via a revenue contribution to capital.

Playgrounds

5.9. A grant has been received from MHCLG of £240k capital and £30k revenue to purchase new or refurbish existing playgrounds in areas of greatest need. It is proposed to add £240k to the capital programme.

Fire Doors

5.10. Replacement of fire doors is required at Eaton House to maintain fire safety compliance. These were not budgeted and will cost £150k. It is proposed to utilise earmarked reserves allocated specifically for major works to assets.

Housing Revenue Account

Cleaver Gardens

5.11. Electrical works are required at Cleaver Gardens to ensure safety measures are met and the property is compliant with regulations. The estimated costs of remedial works is anticipated to be completed within £200k.

5.12. The funding mechanism for these works to go ahead is to utilise £200k of funding which was previously approved for the use on Balconies and Balustrades. These works are not as urgent as the electrical works needed at Cleaver Gardens and can be slipped into the 2027/28 budget.

6. Financial Implications

6.1. Contained throughout the report.

7. Legal Implications

7.1. No specific legal implications have been identified.

8. Equalities implications

8.1. A review has been undertaken, and it has been identified that no assessment is required following consultation and liaison with the appropriate officer.

9. Health implications

9.1. No specific health implications have been identified following the completion of an impact assessment.

10. Climate and environmental implications

10.1. No specific climate and environmental implications have been identified.

11. Section 17 Crime and Disorder Implications

11.1. No direct Section 17 crime and disorder implications have been identified.

12. Risk management implications

12.1. The financial risk register is updated on an annual basis as part of the budget setting reports. The current financial risks were included within the General Fund Revenue Budget 2026/27 Budget Report under Appendix D presented to Cabinet and Council on the 25th February 2026.

13. Human resources implications

13.1. No direct human resource implications have been identified.

14. Biodiversity Implications

14.1. No direct biodiversity implications have been identified.

15. Local Government Reorganisation (LGR) Implications

15.1. No direct LGR implications have been identified.

16. Options considered and reason for their rejection

16.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do nothing	Not applicable as the report is to note the forecast position.

17. Conclusion

17.1. The capital programme is fully funded in its present form. The biggest risks to the Council are inflation, price increases for building supplies plus any delays which could occur result in funding being withdrawn.

17.2. Adjustments to the programme in light of the difficulties around cost and delivery will be reported to Cabinet but projects are continually under review for viability. Interest rates on projects where prudential borrowing is required will be carefully assessed for affordability prior to progressing.

18. Appendices

18.1. Appendix 1 – Quarter 1 Forecast General Fund Capital Outturn 2026/27

18.2. Appendix 2 – Quarter 1 Forecast Housing Revenue Account Capital Outturn 2026/27

19. Background papers

19.1. Capital Budget 2026/27 reported February 2026

19.2. General Fund Revenue Budget 2026/27 – Appendix D – Cabinet / Council February 2026

20. Report Writer Details:

Officer Job Title: Assistant Director - Finance

Officer Name: Liam Brown

Project	Approved Budget	Proposed Carry Forward	Total Budget	Current Forecast	Forecast Variance	Comments
Grayson Place	777,000	2,085,305	2,862,305	2,000,000	(862,305)	Delay submitting planning application - complete early 2027/28
Bridge To Living	0	814,104	814,104	400,000	(414,104)	Works to site under review and will complete in 2027/28
George Eliot Visitor Centre	0	222,500	222,500	222,500	0	
Parks Revival	1,305,307	129,229	1,434,536	800,000	(634,536)	Up to 12 months to complete starting by October 2026
Bedworth Market	25,000	95,950	120,950	120,950	0	
Town Hall - Office Reconfiguration	0	60,450	60,450	60,450	0	
Major Repairs	250,000	84,432	334,432	334,432	0	
Pride in Place Impact Fund	750,000	750,000	1,500,000	1,500,000	0	
Town Centre Regeneration and Business Development	**3,107,307**	**4,241,970**	**7,349,277**	**5,438,332**	**(1,910,945)**	
ICT Strategy Programme	100,000	0	100,000	100,000	0	
Planning & Land Charges Software (IDOX)	0	47,826	47,826	47,826	0	
Camp Hill	0	197,583	197,583	197,583	0	
Digitalisation of Cemetery Records	0	5,327	5,327	5,327	0	
Enabling Services and Communities	**100,000**	**250,736**	**350,736**	**350,736**	**0**	
Empty Homes Works in Default	40,000	0	40,000	40,000	0	
Disabled Facilities Grants - HEART	6,359,027	0	6,359,027	6,359,027	0	
Empty Property Loans	100,000	0	100,000	100,000	0	
Boundary Paddock - Utility Block	0	131,188	131,188	131,188	0	
Warm Homes Local Grant	1,400,000	0	1,400,000	1,400,000	0	
Housing	**7,899,027**	**131,188**	**8,030,215**	**8,030,215**	**0**	
Environmental Bill - Food Waste	1,244,951	0	1,244,951	1,244,951	0	Procurement timetable complete - delivery Q4
Vehicle & Plant Replacement	762,462	551,079	1,313,541	780,000	(533,541)	3 x freighters ordered - Q4 delivery. Carry forward into 2027/28
Planning, Enforcement and Public Services	**2,007,413**	**551,079**	**2,558,492**	**2,024,951**	**(533,541)**	
Bedworth Physical Activity Hub (BPAH)	4,620,000	942,945	5,562,945	5,562,945	0	
Pingles LC Decarbonisation	0	62,017	62,017	62,017	0	
Sandon/Weddington Cycleway	138,494	96,293	234,787	234,787	0	
Coronation Walk Footpath/Cycleway	142,413	94,829	237,242	200,000	(37,242)	Works start Q4 and will run into 2027/28
Clovelly Way Footpath	31,675	0	31,675	31,675	0	
Leisure Strategy	0	106,008	106,008	106,008	0	
Grants - Allotment Provision	0	12,856	12,856	12,856	0	

Improvements to Paul's Land sports fields	0	15,000	15,000	15,000	0	
Chaucer Drive - Play Area	165,000	0	165,000	165,000	0	
Tiverton Drive - Play Area	258,000	0	258,000	258,000	0	
Greenmoor Road - Play Area	44,000	0	44,000	44,000	0	
Pauls Land Pavilion	10,500	0	10,500	10,500	0	
Sandon Park/Jack Whetstone Pavillion	0	26,859	26,859	26,859	0	
Cemetery Works	0	1,305	1,305	1,305	0	
Community Centre Grants	0	73,017	73,017	73,017	0	
BPAH - Green Gym	0	16,155	16,155	16,155	0	
Leisure and Health	**5,410,082**	**1,447,284**	**6,857,366**	**6,820,124**	**(37,242)**	
Miscellaneous Schemes	50,000	0	50,000	50,000	0	Proposed to contribute towards cemetery works
Capital: General	**50,000**	**0**	**50,000**			
General Fund Capital	**18,573,829**	**6,622,257**	**25,196,086**	**22,664,358**	**(2,481,728)**	

APPENDIX 2

Project	Approved Budget	Proposed Carry Forward	Total Budget	Current Forecast	Forecast Variance	Comments
HRA Total Capital	**14,546,891**	**2,858,722**	**17,405,613**	**17,405,613**	**0**	
Major Repairs	**12,686,500**	**736,530**	**13,423,030**	**13,423,030**	**0**	
Decent Homes	1,800,000	0	1,800,000	1,800,000	0	
Roof Coverings/Modifications	1,800,000	0	1,800,000	1,800,000	0	
Windows and Doors	1,300,000	0	1,300,000	1,300,000	0	
Door Entry Scheme	150,000	0	150,000	150,000	0	
Fire Safety Works	2,300,000	626,043	2,926,043	2,926,043	0	
Electric Storage Heating	80,000	0	80,000	80,000	0	
Drainage renewals	44,500	0	44,500	44,500	0	
Balconies and Balustrades	250,000	0	250,000	250,000	0	
Concrete Structural Repairs	400,000	0	400,000	400,000	0	
Level Access Showers	530,000	0	530,000	530,000	0	
Aids & Adaptations	950,000	0	950,000	950,000	0	
Central heating	950,000	0	950,000	950,000	0	
Slabs to Tarmac	156,000	0	156,000	156,000	0	
Lift Renewal Works	150,000	0	150,000	150,000	0	
District Heating Works	350,000	0	350,000	350,000	0	
EICR Electrical	200,000	0	200,000	200,000	0	
Voids	950,000	0	950,000	950,000	0	
Underground Bursts	70,000	0	70,000	70,000	0	
Contingency	56,000	0	56,000	56,000	0	
Cleaver Gardens	0	110,487	110,487	110,487	0	
Housing IT System	200,000	0	200,000	200,000	0	
New Build & Acquisition	1,860,391	2,122,192	3,982,583	3,982,583	0	
New Properties - New Build	1,438,391	2,122,192	3,560,583	3,560,583	0	
Acquisition of Properties	422,000		422,000	422,000	0	