Nuneaton & Bedworth
United to Achieve

Nuneaton and Bedworth Borough Council
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Date: 27th October 2026

Dear Sir/Madam,

A meeting of the **CABINET** will be held in the Council Chamber, Town Hall, Nuneaton, on **Wednesday, 4th November 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 7th October 2026 **(Page 9).**

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. PUBLICATION OF PLANNING GUIDANCE: AIR QUALITY a report of the Assistant Director – Planning attached **(PAGE 15)**

7. ENDORSEMENT OF WARWICKSHIRE LOCAL NATURE RECOVERY STRATEGY – a report of the Assistant Director – Planning **(PAGE 70)**

8. INFRASTRUCTURE FUNDING STATEMENT a report of the Assistant Director – Planning attached **(PAGE 185)**

9. STREET NAMING AND NUMBERING FEES AND CHARGES a report of the Assistant Director – Planning attached **(PAGE 211)**

10. GREAT CRESTED NEWT DISTRICT LICENSING SCHEME a report of the Assistant Director – Planning attached **(PAGE 230)**

11. PLANNING INCOME GENERATION PROJECT a report of the Assistant Director – Planning attached **(PAGE 248)**

12. CONSULTATION ON THE BUDGET 2027/28 a report of the Assistant Director – Finance attached **(PAGE 314)**

13. HOUSES OF MULTIPLE OCCUPATION REGISTER a report of the Strategic Director – Culture and Environment **(PAGE 320)**

14. AGILE WORKING POLICY a report of the Chief Executive **(PAGE 360)**

15. RECOMMENDATIONS FROM OVERVIEW AND SCRUTINY PANEL

i) **Business, Regeneration and Planning OSP**

At its meeting held on 1st October the panel put forward a recommendation to Cabinet, a copy of the minute of the meeting is shown below which includes the recommendation. A link to the meeting is also provided as follows: 1 October 2026: Business, Regeneration and Planning Overview and Scrutiny Panel | Nuneaton and Bedworth Borough Council

BRP 19 Work Programme Suggestion Form
Council Owned Empty Properties

Concerns were raised about paying business rates on some properties even though they are empty, which was considered a waste of money.
A list of all vacant properties was requested along with an asset register, which should include if rates are being paid, the main tenancy costs, how far off they are being rentable, what condition they are in and what expressions of interest there have been on the property.

It was noted that Council Owned Land and Leases (included Council owned empty properties) is on the work programme for the next meeting of this OSP, and some Members raised concerns about duplicating work and overloading the work programme.

A suggestion was also made that empty shops should be rented as seasonal/pop-up shops in the run up to Christmas.

***RESOLVED** that*

a) Information relating to the questions and queries raised at this meeting and within the Work Programme Suggestion Form be included in the Council Owned Land and Leases agenda item coming to the next meeting of this OSP; and

*b) **IT BE RECOMMENDED TO CABINET** that consideration be given to renting out empty shops within the Town Centres for seasonal/pop-up shops in the run up to Christmas.*

ii) Business, Regeneration and Planning OSP

At its meeting held on 1st October the panel put forward a recommendation to Cabinet, a copy of the minute of the meeting is shown below which includes the recommendation. A link to the agenda and reports of meeting is as follows: 1 October 2026: Business, Regeneration and Planning Overview and Scrutiny Panel | Nuneaton and Bedworth Borough Council

BRP 22 **Queensbury Real Estate Ltd**
A report of the Strategic Director – Communities and Place provided Panel Members with an overview of the usage of consultants in relation to the Grayson Place regeneration project.

The Panel discussed and asked questions on the following:

- *Monitoring of the consultants and accountability for the decisions they made. It was noted that the contract concludes at the end of October. The contract started in May 2020.*
- *Potential penalties for the advice given, especially relating to the cinema - and a query was also raised about a possible collective claim with other Councils who also received poor advice.*
- *NDA's – NBBC did not necessarily get accurate feedback from previous Councils who were unable to talk about previous projects – and sharing information could not happen.*
- *It has been agreed that, once the full review has happened it will come back to this Committee.*
- *Lessons learned should be included in the report, along with penalty clauses, the impact of NDA's, the actual amount paid to Consultants, and what the contract included (and what would happen if they did not fulfil their obligations).*

***RESOLVED** that **IT BE RECOMMENDED TO CABINET** that*

a) the final project review report comes to this OSP once completed; and
b) The following issues be included within the scope of the report:
   i. Penalty clauses
   ii. NDA's
   iii. Amount paid to Consultants
   iv. What the contact included (and consequence for not fulfilling obligations)
   v. Lessons learned

iii) Environment, Health and Leisure OSP
Leisure Strategy
At its meeting held on 15th October 2026 the panel put forward recommendations to Cabinet, and the recommendations are shown below. A link to the meeting agenda and reports is provided below:
15 October 2026: Environment, Health and Leisure Overview and Scrutiny Panel | Nuneaton and Bedworth Borough Council

a) **IT BE RECOMMENDED TO CABINET THAT** the Indoor Sports Facility Strategy (IFS) be adopted;

b) **IT BE RECOMMENDED TO CABINET** to refer the Strategic Outcomes Planning Guidance Report be adopted; and

c) **IT BE RECOMMENDED TO CABINET** that the Playing Pitch and Outdoor Sports Strategy Stage E Update be adopted.

16. 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)

17. EXCLUSION OF PUBLIC AND PRESS
RECOMMENDED that under section 100A(4) of the Local Government Act 1972, the public and press be excluded from the meeting during consideration of the following item, it being likely that there would be disclosure of exempt information of the description specified in paragraph 2, 3, 5 and 7 of Part I of Schedule 12A to the Act.

18. THE PINGLES STADIUM AND OPERATOR REVIEW a report of the Deputy Chief Executive

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.

Agenda Item 4

NUNEATON AND BEDWORTH BOROUGH COUNCIL

CABINET **7th October 2026**

A meeting of Cabinet was held on Wednesday 7th October 2026 in the Council Chamber at the Town Hall.

Present

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

CB47 **Apologies**

None

CB48 **Declarations of Interest**

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

CB49 **Minutes**

RESOLVED that the minutes of the Cabinet meeting held on 9th September 2026, be approved, and signed by the Chair

CB50 **Pride in Place Impact Fund Update**

The Assistant Director – Economy & Communities submitted a report providing information to members in relation to the proposed projects for investment via the Pride in Place Impact Fund as endorsed by Cabinet in September 2026.

RESOLVED that

a) the proposed projects as detailed at Section 5 of the report be approved;

b) delegated authority be given to the Strategic Director - Communities and Place, and the Assistant Director for Economy & Communities, in consultation with the Portfolio Holder for Town Centre Regeneration & Business Development, the Leader of the Council, and the Portfolio Holder for Finance, to undertake all necessary procurement and associated activities required to deliver the projects funded through the Pride in Place Impact Fund;

c) delegated authority be given to the Strategic Director - Communities & Place, and the Assistant Director for Economy & Communities, in consultation with the Portfolio Holder for Town Centre Regeneration & Business Development, the Leader of the Council, and the Portfolio Holder for Finance, to allocate the Community Assets Funding for Bulkington, in line with the Fund criteria; and

d) a further report will be brought to a future Cabinet meeting, detailing allocation of resources and project progress.

SPEAKER:
Councillor Kris Wilson
Councillor Michele Kondakor
Councillor Sue Markham
Councillor Jeff Clarke
Councillor Lubs Cvetkovic
Councillor Keith Kondakor

Options
Do nothing – Rejected - because it would not enable the Council to make use of the external Pride in Place Impact Fund allocation to deliver visible improvements to town centres and community spaces. It would not respond to the public consultation feedback, member priorities or the funding objectives, and could risk the loss or underuse of grant funding within the required programme timescales.

Reasons
Utilising the Pride in Place Impact Fund will enable the Council to deliver improvements to community assets, public spaces and town centres, generating social, environmental and economic benefits for residents. These investments will help create stronger, more connected communities and more attractive local places, contributing to the borough's long-term prosperity and wellbeing.

CB51 **Environment Act 2021 – Food Waste Collections**

The Assistant Director – Environment & Enforcement submitted a report updating Cabinet on the arrangements for enacting the delivery of domestic food waste collections in accordance with the requirements of the Environment Act 2021.

RESOLVED that

a) the service provision for domestic food waste collections approved on 25 February 2026 (minute CB92), and the revised implementation timeline set out in section 4.7 and Appendix C of the report be noted;

b) the procurement of seven food waste collection vehicles (six operational and one spare) built to the agreed specification on a 12.5 tonne chassis, rather than the 7.5 tonne chassis originally specified, at an anticipated cost of £124,000 per vehicle, subject to confirmation that the vehicles meet the agreed specification and to a compliant call-off under the framework, to enable service commencement in April 2027;

c) delegated authority be given to award the vehicle contract to the Strategic Director for Culture and Environment, in consultation with the Portfolio Holder and the Section 151 Officer; and

d) the use of £55,599 from the food waste service underspend to meet the shortfall in food waste implementation costs set out in paragraph 6.3 of the report be approved.

SPEAKERS:
Councillor Keith Kondakor
Councillor Kris Wilson
Councillor Michele Kondakor
Councillor Chris Morris

Options:
1) Do nothing - Rejected - the Council has a statutory duty to provide a free, weekly food waste collection service since April 2026. Doing nothing would leave the Council non-compliant and put future Extended Producer Responsibility payments at risk.

2) Proceed with the specified supplier (7.5 tonne chassis) and accept the longer lead-in time – Rejected - Vehicles could take up to twelve months from order, delaying the start of the service and extending the period of non-compliance

3) Hire vehicles to deliver the service in the interim - Rejected - availability of suitable rental vehicles varies, and a full fleet cannot be guaranteed. Hire would also be an additional cost to the service.

4) Procure vehicles of the agreed specification on a 12.5 tonne chassis from an alternative supplier - Recommended - Vehicles are reported to be available from stock, subject to the specification review and a compliant call-off under the framework, which would suggest the service could start in April 2027, with implementation costs exceeding the remaining grant funding by £55,599, to be met from the food waste service underspend.

Reasons:
With a legal requirement to implement domestic food waste collections, NBBC needs to conclude the procurement process and set in place the full timeline for the roll out of the domestic food waste service.

CB52 **Housing Revenue Account – Housing Stock Acquisition – Hawkesbury Development**

A report of the Assistant Director – Housing Services was submitted to Cabinet seeking approval to acquire 14 properties from Tillia Homes Ltd for affordable rent for residents within Nuneaton and Bedworth who are currently on the Council's waiting list for Housing.

RESOLVED that

a) the acquisition of 14 Section 106 properties at Sephton Drive, Coventry, West Midlands, CV6 6QY be approved;

b) **IT BE RECOMMENDED TO FULL COUNCIL THAT** the HRA capital budget is amended to incorporate £2,561,728 over a three-year period as outlined in 5.1 of the report;

c) **IT BE RECOMMENDED TO FULL COUNCIL THAT** the one off charge for 2027/2028 of £91,899 be approved and built into the HRA Business Plan and 2027/2028 budget and note the income outlined in section 5.4 of the report; and

d) delegated authority be given to the Strategic Director for Communities & Place, in consultation with the Portfolio Holder, to acquire the properties.

SPEAKERS:
Councillor Will Markham
Councillor Kris Wilson
Councillor Keith Kondakor

Options:
1) Do nothing – Rejected - There is a 5-year timeframe within which to spend the One for One receipts, meaning that there would be a possibility that some receipts would have to be repaid to Government with interest. The Right to Buy continues to deplete the Council's housing stock. Without this project we will not be able to redress the balance and reduce the waiting times for residents waiting to be housed.

2) Build our own housing stock – Rejected - There are very few developable sites remaining within the Housing Revenue Account. Most remaining sites are complex and / or constrained which increases the cost to build. The Housing Development and Acquisition Strategy recognises the need to consider acquisition in order to maintain a supply of social/affordable homes to mitigate the loss of homes via the Right to Buy. This project will complement the numbers of new homes that the Council is able to facilitate and relieve some pressure on housing demand and temporary accommodation usage and cost to the General Fund. This option is not discounted over the longer term, as both the acquisition proposal within this business case and the building of new homes within the Housing Revenue Account are complementary and necessary to provide a supply of social / affordable housing.

Reasons:
The acquisition of these 14 affordable homes represents a cost-effective opportunity to increase housing supply, reduce demand pressures, and make full use of available Right to Buy receipts to support residents in need.

CB53 **Conduct Public Consultation on the Public Space Protection Orders – Alcohol, Town Centres and Dog Control**

The Assistant Director – Economy & Regeneration submitted to Cabinet seeking approval for a borough-wide public consultation regarding proposed Public Space Protection Orders (PSPOs) under the Anti-Social Behaviour (ASB), Crime and Policing Act 2014. The consultation will seek views on proposed amendments to the Town Centre ASB PSPO, implementation of the Alcohol PSPO and extension of the Dog Control PSPO for a further three years.

RESOLVED that

a) the proposed Town Centre ASB PSPO amendments, Alcohol PSPO implementation and Dog Control PSPO extension be approved for a two-week consultation period commencing mid to late October; and

b) a further report be brought back to Cabinet outlining the findings of the consultation and recommendations for further action.

SPEAKERS:
Councillor Michele Kondakor
Councillor Keith Kondakor
Councillor Kris Wilson
Councillor Will Markham

Options:

- Taking no action was considered and rejected as it would not adequately address ongoing anti-social behaviour and dog control concerns.

Reasons:
A combined consultation will provide residents and stakeholders with the opportunity to shape the future of the Borough's PSPO framework and ensure any future decisions are transparent, proportionate and evidence based.

CB54 **Local Government Reorganisation Update**

The Chief Executive submitted a report to Cabinet to provide Members with an overview of the Warwickshire Local Government Reorganisation (LGR) Programme, summarise progress made to date, explain the current position following recent Government announcements, and outline the contribution made by Nuneaton and Bedworth Borough Council (NBBC) throughout the programme.

RESOLVED that the contents of the report be noted.

SPEAKERS:
Councillor Jeff Clarke
Councillor Kris Wilson
Councillor Keith Kondakor
Councillor Michele Kondakor

Options:
N/A the report is for noting.

Reasons
To update members on the overview of the Warwickshire Local Government Reorganisation Programme.

CB55 **Recommendations from Overview and Scrutiny Panels**

None

CB56 **Any Other Items**

The Leader announced that the remit of Communications and Marketing were to be moved from Portfolio Holder for Resources & Internal Affairs to the Leader of the Council.

Chair

PUBLICATION DATE: 12TH OCTOBER 2026

DECISIONS COME INTO FORCE: 20TH OCTOBER 2026

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 6

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	4 November 2026
Subject:	Publication of Planning Guidance: Air Quality
Portfolio:	Planning, Enforcement and Public Services
Responsible Officer:	Assistant Director - Planning
Corporate Plan – Theme:	Housing, Health and Communities
Corporate Plan – Aim:	Work with partners to improve air quality across the Borough
Ward Relevance:	All
Public or Private:	Public
Amendment to Budget:	No
Council Tax Related:	No
Recommendation to Council:	Yes
Forward Plan:	Yes
Subject to Call-in:	Yes

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1. Purpose of report

1.1. The purpose of this report is to seek Cabinet approval to publish updated Air Quality Planning Guidance following the adoption of the Borough Plan Review on 10 December 2025.

2. Recommendations

2.1. That Cabinet recommend to Full Council that the updated Air Quality Planning Guidance (Appendix A) and Schedule of Additional Trigger Criteria for Major Air Quality Developments (Appendix B) be endorsed and published.

2.2. That Cabinet recommend to Full Council that delegated authority be given to the Assistant Director for Planning, in consultation with the Portfolio Holder for Planning, Enforcement and Public Services, to make any minor amendments to the Air Quality Planning Guidance, Schedule of Additional Trigger Criteria for Major Air Quality Developments' (Appendix B) as required.

2.3. That subject to Full Council agreeing recommendation 2.1 and 2.2, the adopted Air Quality Supplementary Planning Guidance (2020) be formally revoked in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

3. Background

3.1. Supplementary Planning Documents (SPDs) provide detailed advice and guidance to assist with the implementation and interpretation of planning policies included within the Borough Plan Review, supporting the delivery of sustainable development.

3.2. The authority currently has an Air Quality SPD which relates to policies within the Borough Plan (2011-2031). The Borough Plan (2011-2031) has since been superseded by the adoption of the Borough Plan Review (2021-2039) on 10 December 2025. Therefore, the Air Quality SPD requires updating to align with the updated Borough Plan Review policies.

3.3. In accordance with the Levelling-up and Regeneration Act 2023 and the Levelling-up Regeneration Act 2023 (Commencement No.11 and the Savings and Transitional Provisions) Regulations 2026 (SI 2026/169)[1] which came into effect on 25 March 2026, Local Planning Authorities are unable to adopt new SPDs after 30 June 2026. Therefore, it is no longer possible for the Council to adopt a new Air Quality SPD.

[1] The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026

3.4. Instead, to update the Air Quality SPD, non-statutory Air Quality Planning Guidance is being brought forward. The document will not hold the formal statutory weight of an SPD but is still a material consideration when considering planning applications and has been drafted to align with the Borough Plan Review, and changes to national policy and guidance.

3.5. The document does not introduce new policy or financial requirements of developers but provides technical detail and policy clarifications and how to comply with Local Policies.

4. Body of report and reason for recommendations

4.1. Following the adoption of the Borough Plan Review, Air Quality consultants were commissioned to review and update the current Air Quality SPD to align with the policies within the Plan. The Council committed to produce the SPD through the publication of the Local Development Scheme (LDS) (approval granted by Full Council on 10 December 2025). However, during the commission, the changes to national planning legislation meant that the updated Air Quality SPD would not be adopted within the timeframes stipulated by national government. Therefore, it was considered that the document should instead be published as guidance. This aligns with the approach being taken by other authorities in a similar position.

4.2. In finalising the document, internal consultation has been undertaken with relevant departments and Warwickshire County Council. The main changes to the document include:

- Air Quality Management Area (AQMA) revocation: both Nuneaton AQMAs (Leicester Road Gyratory and Midland Road–Corporation Street) have been revoked (2025 and 2026).
- National Policy Context: references are updated to reflect the latest National Planning Policy Framework (NPPF) which was published in August 2026.
- Local Policy Context: the document is updated to reflect the new Nuneaton and Bedworth Borough Plan (2021–2039).
- New PM2.5 regime: Environment Act 2021 statutory PM2.5 targets (10 µg/m³ annual mean and 35%

population exposure reduction, both by 2040, with 2030 interim targets) and a new “Emission Minimisation Test” sitting alongside the existing exposure test.

- Biomass boilers: 2020 permitted them subject to strict NOx/PM standards; the document states biomass boilers “should not be used in new development”
- Gas boilers: electric heating as default, with gas boilers only acceptable “in exceptional circumstances”; the built-up area spark-ignition NOx standard.
- New section on flues for combustion plant.
- New section on domestic wood burning new houses.
- New section on commercial kitchens
- Damage cost Methodology adds building/combustion emissions from on-site plant alongside transport emissions; pollutants are NOx and PM2.5 (not PM10); 2025 base prices; separate ‘Road Transport Urban Large’ and ‘Domestic Urban Large’ damage cost categories; a new offsetting formula and a benchmark/excess-emissions/annual-offsetting-amount table structure.

4.3 In order to ensure the document can be kept easily up to date, the ‘Additional Trigger Criteria for Major Air Quality Developments’ section, which was previously contained within SPD has been removed and is now a separate Schedule.

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

5.1. Consultation with Environmental Health and relevant Officers at Warwickshire County Council

6. Financial Implications

6.1. The document provides examples of pollutant damage costs. Damage costs are an estimate of the costs to society (mainly due to health impacts) per tonne of pollutant emitted. They provide an easy reckoning of the monetised value of changes in pollution.

6.2. Where mitigation is not integrated into a proposal, the Council will require this through planning conditions. If on-site mitigation is not possible then the Council will seek compensation for the identified air quality impacts through a Section 106 agreement or similar agreement.

7. Legal Implications

7.1. The Planning and Compulsory Purchase Act 2004 requires planning authorities to prepare Local Plans. The Town and Country Planning (Local Planning) (England) Regulations 2012) prescribe the general form and content of local plans. The Government has set an annual mean concentration target (AMCT) and a population exposure reduction target (PERT) for PM2.5 under the Environment Act 2021. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 set targets. The Environment Act 2021 also requires the Government to publish an Environmental Improvement Plan (EIP) every five years which should include interim targets. Also, Pollution Prevention and Control Act 1999 and the Environmental Permitting Regulations 2016 (as amended. Section 106 Agreements (S106) are set out in the Town and Country Planning Act 1990.

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. The Air Quality Guidance seeks to deliver health improvements by helping reduce exposure to air quality pollutants.

10. Environmental implications

10.1. If the recommendations are approved, the decisions will bring the following benefits from an environmental perspective:

i. Reductions in vehicle emissions and fossil fuels
ii. Enhancing Green Infrastructure to improve air quality or mitigate the impacts of development.

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 option was identified. The reason for its 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	Not to recommend the endorsement and publication of the guidance to Full Council	Rejected – The publication of the new Air Quality Planning Guidance document will provide planning guidance in accordance with the commitments set out in the adopted Borough Plan Review (2021-2039). The document will provide greater certainty to applicants and developers preparing applications for submission. Having an updated document will likely assist with improving the quality of planning applications, which helps to accelerate the

		planning process whilst achieving better outcomes for the community.

17. Conclusion

17.1. That Cabinet recommends the endorsement and publication of the updated Air Quality Planning Guidance document and the Additional Trigger Criteria for Major Air Quality Developments and recommend the revocation of the Air Quality SPD to Full Council. Further, delegated authority be given to the Assistant Director for Planning, in consultation with the Portfolio Holder for Planning, Enforcement and Public Services, to make any minor amendments, if required, to the Additional Trigger Criteria for Major Air Quality Developments.

18. Appendices

18.1. Please note the following appendices:

i. Appendix A – Planning Guidance: Air Quality
ii. Appendix B – Schedule of Additional Trigger Criteria for Major Air Quality Developments

19. Background papers

19.1. The Borough Plan Review examination documents can be viewed at: Borough Plan Review

19.2. Full Council – 10 December 2025 – Agenda Item 13c – Minute Reference CL49 iii) Adoption of Borough Plan and Local Development Scheme.

19.3. Air Quality Supplementary Planning Document (2020) can be viewed at: Air Quality SPD

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Contents

Title page....1
1.0 Purpose of the guidance....4
2.0 Local Air Quality....5
3.0 National Policy & Practice....6
National Planning Policy Framework....6
Planning Practice Guidance....7
4.0 Local Plan....10
Policy HS2 – Strategic Accessibility and Sustainable Transport....10
BE3 – Sustainable Design and Construction....12
5.0 Development Classification, Assessment and Mitigation....14
Stage 1 - Development Classification....17
Stage 2 - Air Quality Impact Assessment....18
Exposure and Emissions Minimisation Assessments....18
Major Classified Proposals....19
Stage 3 – Mitigation and Off-setting....21
Assessing the Acceptability of a Scheme....25
Specific Issues....25
Heating and Power....25
Biomass Boilers....26
Flues for Combustion Plant....26
Domestic Wood Burning....26
Commercial Kitchens....26
Standby / Back-up Power Generation....26
Permitting under the Pollution Prevention and Control Act 1999 and the Environmental Permitting Regulations 2016 (as amended)....27
Mechanical Ventilation....27
Green Infrastructure and Planting....28
Section 106 Agreements and Community Infrastructure Levy (CIL)....28
Appendix A - Department for Transport Criteria for Transport Assessments....30
Appendix B - Air Quality Assessment Protocol to Determine the Impact of Vehicle Emissions from Development Proposals....32
Key Components of an Air Quality Assessment....32
Air Quality Monitoring....34
Assessing Demolition/Construction Impacts....34

Cumulative Impacts....35
Appendix C – Damage Costs: Calculations and Example....36
Glossary....41

Table 1 – Air Quality Classification of Developments....17
Table 2 – Type 1 Mitigation....22
Table 3 – Type 2 Mitigation....23
Table 4 – Type 3 Mitigation....24
Table 5 – Non Road Mobile Machinery (NRMM) Controls....24

Figures

Figure 1 - Air quality in the development management process flowchart (extracted from Air Quality Planning Practice Guidance)....9
Figure 2 – Classification, assessment and mitigation of new developments....15

Tables

Table 1 – Air Quality Classification of Developments....17
Table 2 – Type 1 Mitigation....22
Table 3 – Type 2 Mitigation....23
Table 4 – Type 3 Mitigation....24
Table 5 – Non-Road Mobile Machinery (NRMM) Controls....24

1.0 Purpose of the Guidance

1.1 Nuneaton and Bedworth Borough Council (the Council) has to weigh up economic, social and environmental factors when deciding to grant or refuse planning permission or decide if conditions are required to achieve sustainable development. This guidance is designed to support measures to mitigate against and improve air quality impacts resulting from new developments. It is based on an earlier supplementary planning document (SPD) developed in cooperation between Coventry City Council, Coventry & Warwickshire Public Health, Nuneaton and Bedworth Borough Council, North Warwickshire Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council.

1.2 Air quality is a material consideration that planners are required to take into account when making plans and planning decisions. This guidance aims to simplify the consideration of air quality impacts associated with development schemes and focus on incorporation of mitigation at the design stage, countering the cumulative impacts of aggregated developments, providing clarity to developers and defining 'sustainability' in air quality terms.

1.3 The objectives of this guidance document are:

- to improve the consideration of air quality and health impacts in the planning process, in line with national and local policy and practice;
- to help ensure consistency in the approach to dealing with air quality and planning in the Borough;
- to highlight the existing policy framework and emphasise the importance of air quality as a material planning consideration;
- to identify the circumstances where detailed assessments and/or low emission strategies will be required as part of planning applications;
- to provide guidance on measures that can be implemented to mitigate the potentially harmful impacts of new developments on air quality;
- to promote the identification of suitable mitigation for major schemes through pre-application discussions;
- to provide guidance on the use of planning conditions and Section 106 obligations to improve air quality; and

- to encourage co-benefits of reducing carbon and noise emissions.

2.0 Local Air Quality

2.1 The Council had two designated air quality management areas (AQMAs) in Nuneaton due to annual average concentrations of nitrogen dioxide (NO_2) above the relevant Air Quality Objective. The Leicester Road Gyratory, Nuneaton AQMA was revoked in 2025 and the Midland Road to Corporation Street, Nuneaton AQMA was revoked in 2026. The main source of air pollution within Nuneaton and Bedworth originates from road traffic emissions. The Council adopted its latest Air Quality Action Plan (AQAP) in April 2022 covering the period 2022 to 2027[1]. Air quality has improved in the borough, and elsewhere in England in recent decades and is likely to continue to improve in the future. As the AQMAs have been revoked the Council will develop an overarching Local Air Quality Strategy for the borough.

2.2 As part of the evidence base for the new Borough Plan, an Air Quality Assessment was undertaken which shows that it will not cause any exceedances of the objectives[2].

2.3 While levels of particulate matter (PM_{10}/$PM_{2.5}$) and nitrogen dioxide (NO_2) in Nuneaton and Bedworth do not breach the Air Quality Objectives, there is likely to remain a significant impact on health across the Borough due to air pollution. Short-term exposure to $PM_{2.5}$ exposure can exacerbate symptoms of asthma and chronic pulmonary disease, while long term exposure can affect strokes, lung cancer, diabetes, Alzheimer's and Parkinson's disease and poor lung health in children [3]. In the 4 years to March 2023, 54 children and young people (aged up to 17 years) died from asthma, in England with deaths being four times higher in more deprived locations.[4]

2.4 Since the Air Quality Objectives were set there has been a huge number of research projects linking air pollution to disease. In 2021 the World Health Organization (WHO) substantially revised downwards their health based air quality guidelines. Most people in

[1] https://www.nuneatonandbedworth.gov.uk/downloads/file/926/nuneaton-and-bedworth-air-quality-action-plan-2022
[2] https://www.nuneatonandbedworth.gov.uk/adopted-borough-plan/borough-plan-1
[3] https://check-air-quality.service.gov.uk/pollutants/particulate-matter-25
[4] Stoianova S, Williams T, Odd D *et al* on behalf of the National Child Mortality Database. Child deaths due to asthma or anaphylaxis. National Child Mortality Database Programme thematic report; data from April 2019 to March 2023. December 2024. www.ncmd.info/publications/child-deaths-asthma-anaphylaxis-allergy/ [Accessed 3 April 2025].

England are exposed to levels above the new WHO guidelines. The UK has the highest prevalence of asthma in Europe[5].

2.5 As health effects occur at levels well below the regulatory objectives[6], it is important that concentrations continue to be reduced in the future to protect public health.

2.6 It is also important that development which is used by groups particularly vulnerable to the effects of air pollution, such as children and those with pre-existing illnesses, is located appropriately to protect the health of the local community.

3.0 National Policy & Practice

National Planning Policy Framework

3.1 National planning policy is set out in the National Planning Policy Framework (NPPF) (2026) [7]. It states that the purpose of the planning system is to contribute to the achievement of sustainable development, by managing the use and development of land in the long-term public interest (NPPF paragraph 15).

3.2 Policy TR3 requires the environmental impacts of traffic and transport infrastructure to be identified, assessed and taken into account – including taking opportunities to avoid or mitigate any adverse environmental effects, and to secure net environmental gains such as reductions in air pollution.

3.3 With respect to air quality Policy P3: Living conditions and pollution requires development proposals to:

a. Provide healthy living conditions for occupiers and users in terms of avoiding exposure to levels of air pollution which could have an unacceptable adverse effect on health and the quality of life. Where necessary suitable mitigation measures should be incorporated to secure acceptable living conditions;

b. Not give rise to or contribute to unacceptable levels of air pollution on or beyond the site. Adverse impacts of this nature should be avoided where possible, or else mitigated to an acceptable degree. Where possible, opportunities should be taken to

[5] Wecker H, Tizek L, Ziehfreund S *et al*. Impact of asthma in Europe: A comparison of web search data in 21 European countries. *World Allergy Organ* 2023;16:100805. https://doi.org/10.1016/j.waojou.2023.100805
[6] https://www.who.int/news-room/questions-and-answers/item/who-global-air-quality-guidelines
[7] *https://assets.publishing.service.gov.uk/media/6a8334c03bd75b81e2329ac4/National_Planning_Policy_Framework.pdf*

reduce pollution affecting the wider area (such as through traffic and travel management); and

c. Sustain and contribute to compliance with relevant limit values or national objectives and targets for air pollutants including $PM_{2.5}$. Development proposals should take account of Air Quality Management Areas and be consistent with the objectives of relevant Air Quality Action Plans, Clean Air Plans and Local Air Quality Strategies.

3.4 In applying this policy, it should be assumed, unless there is clear evidence to the contrary, that separate regulatory regimes for the control of pollution will operate effectively, as set out in policy DM7. This means that it will be appropriate to take into account emissions limits set through those other regimes.

3.5 Policy P4:Impact of development on existing activities states that existing activities should not have unreasonable restrictions placed on their operation as a result of development being approved after they were established. Development proposals should be capable of being integrated effectively.

Planning Practice Guidance

3.6 The Planning Practice Guidance (PPG)[8] provides advice to planning authorities on implementing the NPPF, including guidance on how air quality can be considered as part of the planning process, from reference ID 32-001-20191101to 32-008-20191101[9].

3.7 At PPG paragraph 2[10] it states "All development plans can influence air quality in a number of ways, for example through what development is proposed and where, and the provision made for sustainable transport. Consideration of air quality issues at the plan-making stage can ensure a strategic approach to air quality and help secure net improvements in overall air quality where possible."

3.8 Further to the above it also states that, "the plans may need to consider:

- what are the observed trends shown by recent air quality monitoring data and what would happen to these trends in light of proposed development and / or allocations.
- the impact of point sources of air pollution (pollution that originates from one place);

[8] www.gov.uk/government/collections/planning-practice-guidance
[9] www.gov.uk/guidance/air-quality--3
[10] Reference ID: 32-002-20140306

- the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments, including their implications for vehicle emissions;
- ways in which new development could be made appropriate in locations where air quality is or is likely to be a concern and not give rise to unacceptable risks from pollution. This could, for example, entail identifying measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan/Local Air Quality Strategy or low emissions strategy where applicable; and
- opportunities to improve air quality or mitigate impacts, such as through traffic and travel management and green infrastructure provision and enhancement.

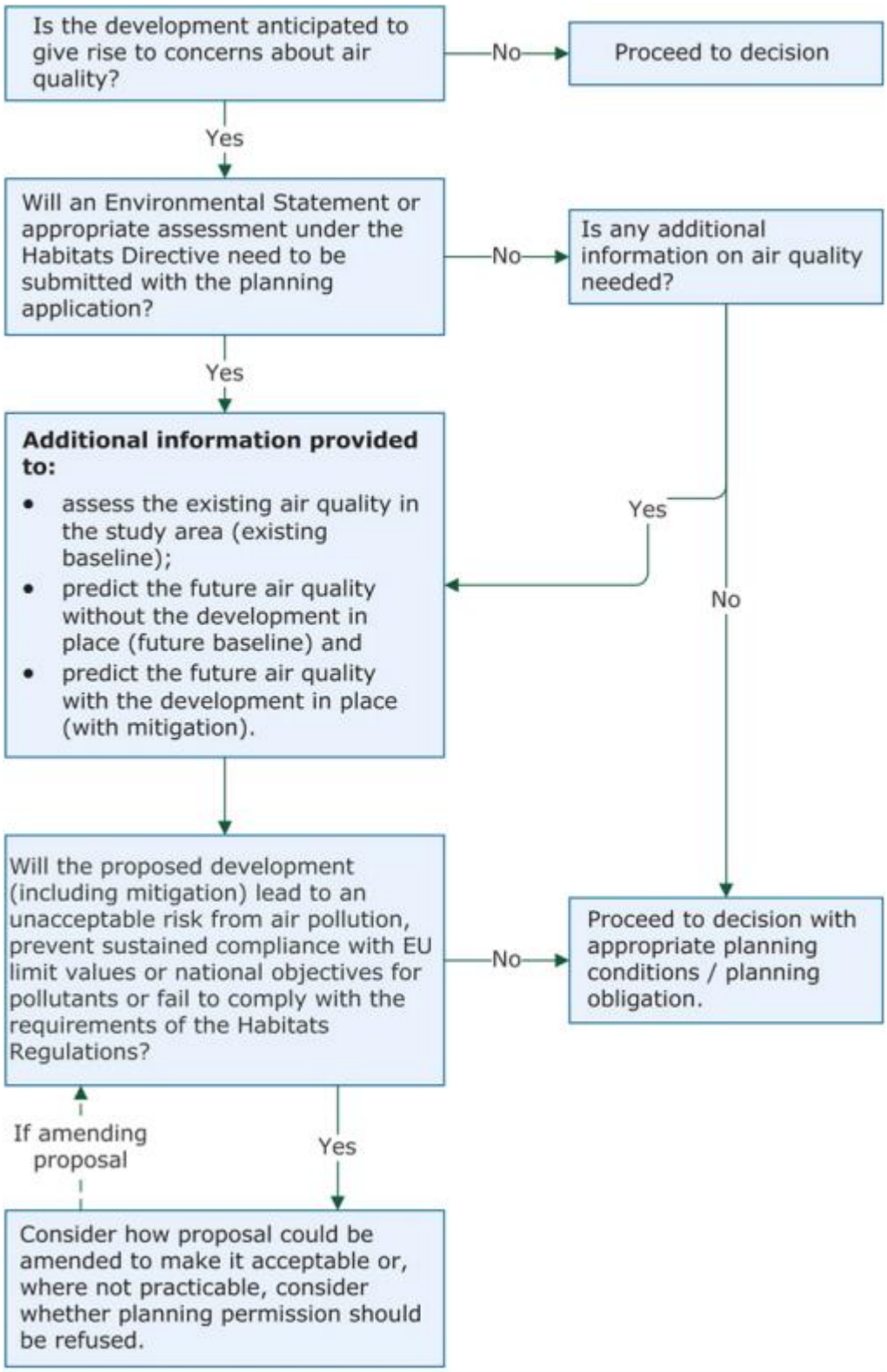
3.9 At PPG paragraph 5[11] it states, “Whether air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to have an adverse effect on air quality in areas where it is already known to be poor, particularly if it could affect the implementation of air quality strategies and action plans and/or breach legal obligations (including those relating to the conservation of habitats and species). Air quality may also be a material consideration if the proposed development would be particularly sensitive to poor air quality in its vicinity.”

3.10 The steps a local planning authority might take in considering air quality are set out in the flow diagram in Figure 1 - Air quality in the development management process flowchart overleaf (PPG paragraph 005[12]).

3.11 The flowchart states that where a planning proposal, including mitigation, prevents sustained compliance with EU Limit Values or National Objectives for air quality and cannot be made acceptable then refusal of planning permission should be considered.

[11] Reference ID: 32-005-20140306
[12] Reference ID: 32-005-20191101

Figure 1 - Air quality in the development management process flowchart (extracted from Air Quality Planning Practice Guidance)



4.0 Local Plan

4.1 The Planning and Compulsory Purchase Act 2004 requires planning authorities to prepare Local Plans. The Town and Country Planning (Local Planning) (England) Regulations 2012) prescribe the general form and content of local plans, including what additional matters local planning authorities must have regard to when drafting their local plans.

4.2 The current Nuneaton and Bedworth Borough Plan was adopted in December 2025. The evidence base for the development of this Plan included an assessment of the air quality impacts[2]. The assessment found that overall, the air quality effects of the Borough Plan will not be significant.

4.3 The Nuneaton and Bedworth Borough Plan (2021-2039) contains policies on sustainable transport (Policy HS2) and sustainable design and construction (Policy BE3) which include air quality.

Policy HS2 – Strategic Accessibility and Sustainable Transport

Transport proposals in line with those identified in the Coventry and Warwickshire Local Enterprise Partnership Strategic Economic Plan and Warwickshire County Council Local Transport Plan (2011-2026) (or subsequent updates) Warwickshire County Council Cycle Network Development Plan/Local Cycling and Walking Infrastructure Plan (LCWIP) and Bus Service Improvement Plan (BSIP) will be supported.

The Strategic Transport Assessment (2023) modelling work assessed the provision of new dwellings or sq.m. of employment land as a maximum, whilst the policies refer to a minimum. Therefore, submissions for higher quantums will need to be assessed as part of any Transport Assessment submitted, to support a planning application, and additional infrastructure may be identified as necessary. Furthermore, new development should be integrated effectively with existing businesses and community facilities.

Where a development is likely to have transport implications, planning applications are required to clearly demonstrate how the following issues will be addressed:

1. How the development ensures adequate accessibility in relation to all principal modes of transport to drive carbon neutrality and resilience to climate change.
2. Whether the development identifies suitable demand management measures.
3. How the proposal accords with the Council's adopted Transport Demand Management Matters (2022) and Air Quality (2020) SPDs. Development must consider the cumulative impact on air quality and measures proposed to ensure impact is not exacerbated, sustaining and contributing towards

compliance with relevant limit values or national objectives for pollutants, taking into account the presence of AQMAs and Clean Air Zones. The Council will require measures for new development to provide infrastructure to deal with the issues of air quality, which at its minimum, development will need to provide electric vehicle charging points and dust management plans.

4. The connectivity of the Proposals for dedicated lorry parking facilities will be supported where they form extensions to, or are adjoining, existing employment land comprising of predominantly B8 uses or as part of a new predominantly B8 use development. development to strategic facilities.

5. How the development delivers sustainable transport options in a safe way that link to the wider transport network. Development needs to include the provision of secure cycle parking, easier access to rental bikes, e-bike hubs, lockers and showers in new workplace developments and appropriate shelter or cooling along the walking and cycling links.

6. Whether the proposal will meet acceptable levels of impact on existing highways networks and the mitigation measures required to meet this acceptable level.

7. Transport elements need to reflect the National Design Guide, the National Model Design Code and Warwickshire Design Guide.

8. Development will need to be designed to provide safe and suitable access for all users. Proposals for dedicated lorry parking facilities will be supported where they form extensions to, or are adjoining, existing employment land comprising of predominantly B8 uses or as part of a new predominantly B8 use development, subject to proposals satisfactorily according with the relevant policies in this Borough Plan Review.

Proposals should target a minimum 15% modal shift to non car-based uses by including provisions which promote more sustainable transport options.

The Council supports the provision and integration of emerging and future intelligent mobility infrastructure that will help to deal with the issue of air quality.

The Council will work proactively with Warwickshire County Council and Midlands Connect in order to support a new sustainable train station and parkway within the Nuneaton area.

BE3 – Sustainable Design and Construction

All development proposals must be:

1. Designed to a high standard and meet the ten characteristics of the National Design Guide and National Model Design Codes. Designed to meet the requirements specified in any relevant extant Concept Plan SPD and the Sustainable Design and Construction SPD (2020).

2. Able to evidence efficient use and protection of natural resources.

3. Able to evidence that new developments are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day (or any future reduction stated within an updated version of the Building Regulations 2010).

4. Able to evidence that new development will maximise energy efficiency and meet the optional higher standard for Building Regulations in regard to energy use. Development should adhere to the Future Homes and Buildings Standard, prior to its introduction in 2025, by promoting a fabric first approach, including the use of passive design principles where possible.

5. Minimise the potential for pollution of air, soil, noise and light, and in particular not contribute to unacceptable levels of air pollution.

6. Adaptable, resilient and minimise climate change impacts to achieve the nation's carbon net zero emissions target by 2050.

7. Able to reduce crime by demonstrating where the principles of Secured by Design have been incorporated into the design including consideration of wider security and defence.

8. Able to promote sustainable transport.

9. Able to promote placemaking strategies for an inclusive, safe, accessible and healthy living environment for all.

Urban Character

All development proposals must contribute to local distinctiveness and character by reflecting the positive attributes of the neighbouring area and respecting the sensitivity to change of the generic character types within each urban character area. Development must take a comprehensive and coordinated approach, respecting existing constraints, including utilities, situated within each site. Key characteristics to consider include:

1. Current use of buildings.
2. Ownership/tenure.
3. Street layout.

4. Patterns of development.
5. Residential amenity.
6. Plot size and arrangement.
7. Built form.

Heritage Assets

Heritage assets can be a valuable aid to achieving sustainable development, in both climate change mitigation and adaptation. For example, retaining, repairing, refurbishing, retrofitting and reusing heritage assets, and especially historic buildings, can contribute to reducing carbon emissions. The historic environment is also important in respect of the embodied carbon value of buildings. In particular, the contribution that the retention and reuse of old buildings make, together with the sustainability of traditional building materials and design.

Residential

Residential development must meet 95% M4(2) and 5% M4(3) Building Regulations standards for access, the NDSS and the principles set out within the relevant SPDs (including the Future Homes and Buildings Standard where technically and financially feasible). Where assessment methods are changed or superseded, the appropriate replacement standards will be used.

All residential developments must be designed with sufficient private outdoor amenity space to promote health and wellbeing.

Major development proposals must also provide a statement, with their application, showing how their proposal will:

1. Meet all of the 12 considerations in Building for a Healthy Life. Where it is not possible to positively meet all considerations, a statement of justification must be provided to explain why it is not possible, and what mitigation measures will take place to offset this.

2. Install rainwater harvesting and greywater recycling systems in the curtilage of all new buildings.

3. Integrate the principles of passive solar design.

4. Be able to accommodate the flexible needs of occupants. Development proposals for estate regeneration will be supported where they deliver high quality, well designed housing and improved public space.

Commercial

Major non-domestic (commercial) development proposals must meet the Building Research Establishment's Environmental Assessment Method (BREEAM) very good standard for new construction projects, using the most up-to-date new construction version of BREEAM, or equivalent LEED standard, where technically and financially feasible.

1. Applicants must submit a pre-assessment, as part of an application, demonstrating the proposed design will meet the BREEAM very good standard.

2. Applicants are also required to submit certificates once the development has been completed at post construction.

Where assessment methods are changed or superseded, the appropriate replacement standards will be used.

Sustainable Construction

Development must minimise or re-use waste generated during the construction phase. This should be done by using materials and construction techniques that generate the least waste and minimise emissions. Waste should be treated as a resource to be re-used, recycled or recovered, and should only be disposed of when all other options have been explored.

On-site management of waste will be preferred, unless the activities would result in unacceptable harm through impacts on the environment, transport, neighbouring uses or that management elsewhere would have wider sustainability benefits.

Where a developer considers meeting any of the above requirements is unviable or can demonstrate that they are not suited to local circumstances, an independent Viability Assessment must be submitted with the application.

4.4 This document should be read in conjunction with other Council SPDs including updated SPDs, and wider policies that are available on the Council's website[13].

5.0 Development Classification, Assessment and Mitigation

5.1 The assessment of air quality for relevant planning applications should follow a three-stage process:

1. Stage 1 - Development Classification - Determining the classification of the development proposal;
2. Stage 2 - Air Quality Impact Assessment - Assessing and quantifying the impact on local air quality;
3. Stage 3 – Mitigation - Determining the level of mitigation required by the proposal to make the scheme acceptable.

[13] www.nuneatonandbedworth.gov.uk/boroughplan

5.2 The stages for classification, assessment and mitigation of development proposals are shown in Error! Reference source not found.

5.3 Not all development may fit into this classification model and further guidance on specific developments has been provided in the Specific Issues section.

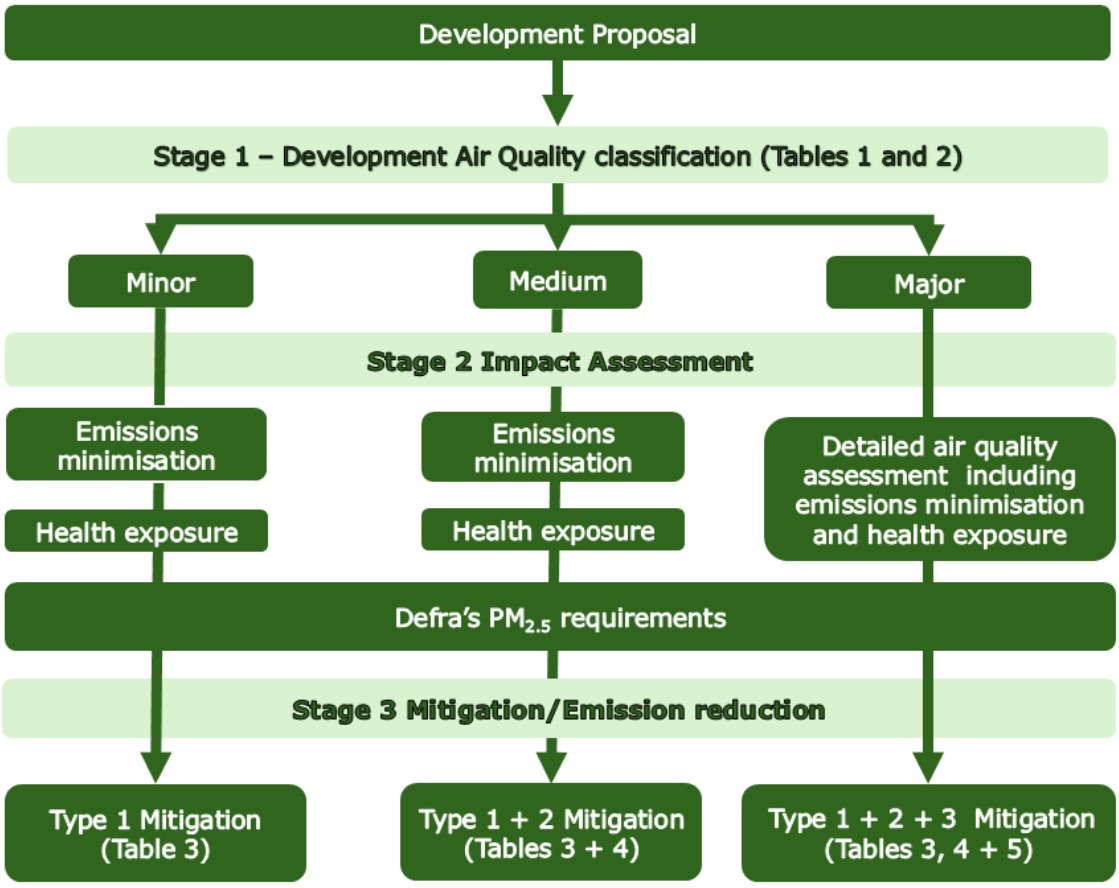


Figure 2 – Classification, assessment and mitigation of new developments

5.4 In addition, a $PM_{2.5}$ assessment is required. The Government has set an annual mean concentration target (AMCT) and a population exposure reduction target (PERT) for $PM_{2.5}$ under the Environment Act 2021. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 set the following targets:

- Annual mean of 10 µg/m^3 to be achieved by 31st December 2040
- At least a 35% reduction in population exposure by the end of 31st December 2040 compared to the average population

exposure in the three-year period from st January 2016 to 31st December 2018 ("the baseline period")

5.5 The Environment Act 2021also requires the Government to publish an Environmental Improvement Plan (EIP) every five years which should include interim targets. The current EIP, published in 2025, commits the Government to the following interim targets:

- An AMCT of 10 µg/m^3 to be achieved by December 2030
- A population exposure reduction target of 30% compared to 2018 to be achieved by December 2030.

5.6 These interim targets are aligned with the trajectory towards the statutory targets[14].

5.7 In 2024 the Department for Environment Food and Rural Affairs (Defra) published interim Planning Guidance on how the Environment Act $PM_{2.5}$ targets should be considered in planning decisions[15]. The new approach moves away from a requirement to assess solely whether a scheme is likely to lead to an exceedance of a legal limit and instead ensures that appropriate mitigation measures are implemented from the design stage, streamlining the process for planning and ensuring the minimum amount of pollution is emitted and that exposure is minimised.

5.8 Pending publication of the final guidance, applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of $PM_{2.5}$ and its precursors as far as is reasonably practicable. More detailed assessments are expected for developments which are closer to populations, and those which are likely to have higher emissions.

5.9 All developments which would normally require an air quality assessment should provide a $PM_{2.5}$ assessment following the latest Defra guidance.

5.10 For other pollutants an emissions minimisation statement is required, where appropriate, setting out how the design of the proposed development will reduce emissions of these pollutants.

[14] https://www.gov.uk/government/publications/air-quality-environment-act-target-delivery-plan/air-quality-environment-act-target-delivery-plan
[15] https://uk-air.defra.gov.uk/pm25targets/planning

Stage 1 - Development Classification

5.11 The classification of developments for air quality purposes will be assessed against the criteria shown in Table 1 – Air Quality Classification of Developments.

Table 1 – Air Quality Classification of Developments

Air Quality Classification	Minor	Medium	Major
Threshold	Proposal is below the threshold criteria for a Transport Assessment or Travel Plan[16]	Proposal meets threshold criteria for a Transport Assessment or Travel Plan .	Medium developments which trigger any of the following criteria: i) Where development requires an Environmental Impact Assessment (EIA)[17] and air quality is to be considered ii) Where any of the criteria in Schedule of Additional trigger criteria for major air quality classification developments are triggered.
Assessment	Exposure and Emission Reduction Assessment, where applicable	Exposure and Emission Reduction Assessment, where applicable	Air Quality Assessment required including an evaluation of changes in emissions[18]. Exposure Assessment, where applicable
Mitigation	Type 1	Types 1 and 2	Types 1, 2 and 3

[16] www.gov.uk/guidance/travel-plans-transport-assessments-and-statements
[17] www.gov.uk/guidance/environmental-impact-assessment
[18] Assessment includes monetisation of the impacts arising from emission changes in line with Defra IGCB Damage Costs

5.12 Paragraph 118 of the NPPF (2024) sets out that all developments that generate significant amounts of transport movement should be supported by a Transport Statement or Transport Assessment. Local planning authorities must make a judgement as to whether a development proposal would generate significant amounts of movement on a case by case basis (i.e. significance may be a lower threshold where road capacity is already stretched or a higher threshold for a development in an area of high public transport accessibility). However, the Department for Transport (DfT) previously set out threshold criteria for Transport Assessments (TA), although now archived, they provide a useful starting point. The threshold criteria can be found in Appendix A. For further clarification, please contact Warwickshire County Council's Highway Development Management Team.

5.13 The Schedule of Additional Trigger Criteria for Major Air Quality Developments are provided on the Council website.

Stage 2 - Air Quality Impact Assessment

Exposure and Emissions Minimisation Assessments

Exposure Test

5.14 Smaller development proposals may not in themselves create an additional air quality problem but will add to local air pollution and potentially introduce more people likely to be exposed to existing levels of poor air quality. Table 1 states that no assessment is required for 'minor' and 'medium' impact schemes, except for the need to consider, where appropriate, whether the development will expose future occupiers to unacceptable levels of air pollution.

5.15 An assessment of the likelihood of introducing additional exposure will be determined using the following criteria:

- The proposal is sited less than 20m from roads where annual mean NO_2 concentration is predicted to be above 20 µg/m^3 (the 2024 European Limit Value; but double the WHO guideline). Defra GIS modelled maps - http://uk-air.defra.gov.uk/data/gis-mapping
- The proposal is in an area where there is significant domestic woodburning, where there is likely to be elevated $PM_{2.5}$ levels.
- The proposal is one of the Land Use types:
  - C1 to C3;
  - C4 (Homes of Multiple Occupation);
  - D1;
  - and within 20m of roads with >10,000 AADT movements

5.16 Where it is unclear whether levels of NO_2 may pose an unacceptable exposure risk to the inhabitants of proposed dwellings, it may be appropriate to undertake a period of monitoring at the site as part of the air quality assessment. The requirements of such programmes are to be agreed with the Environmental Health Team prior to monitoring commencing (see Appendix B).

5.17 The outcome of the exposure assessment will determine the level of mitigation required to make the development acceptable. Should there be no acceptable or insufficient mitigation, the recommendation may be to consider refusing the proposal on air quality grounds.

Emission Minimisation Test

5.18 Defra's interim planning guidance on the $PM_{2.5}$ targets requires the following to be considered, with evidence where possible:

- How has exposure to $PM_{2.5}$ been considered when selecting the development site?
- What actions and/or mitigations have been considered to reduce $PM_{2.5}$ exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of $PM_{2.5}$ and its precursors?

5.19 Planning authorities are encouraged to consider the cumulative impact of development both in developing their Local Plan and when making decisions on a case-by-case basis.

5.20 Depending on the development it may be appropriate to consider emissions minimisation for other pollutants.

MAJOR Classified Proposals

5.21 It is important that all major schemes should identify suitable assessment requirements and potential mitigation through pre-application discussions[19].

5.22 The scale and nature of this type of proposal is such that a detailed air quality assessment will be required to determine the impact on public health and the local environment. The assessment requires:

a.). The identification of the level of exposure through the change in pollutant concentrations including cumulative impacts arising from the proposal, during both demolition/construction operations

[19] www.nuneatonandbedworth.gov.uk/info/20025/planning_and_building_control/56/pre-application_advice/1

and operational phases. Mitigation measures should be identified and modelled where practicable.

b). The calculation of pollutant emissions costs from the development.

c). An assessment of $PM_{2.5}$ impacts using Defra's methodology (required when there is an air quality assessment).

5.23 The methodology to be used for the determination of pollutant concentration change should meet the requirements of the Defra's LAQM Technical Guidance Document LAQM (TG22)[20]. Further details of the air quality assessment requirements can be found in Appendix B and through Council Environmental Health Officers. All Air Quality Assessments received will be assessed by the Council against the requirements of TG22 (as updated). If the requirements are not met, the Council may request that the applicant carries out the assessment again. If the assessment does not meet the required standards, the application may be refused.

5.24 The pollutant emissions costs calculation will identify the damage costs associated with the proposal and will assist the Council in assessing the overall impacts on air quality arising from major developments. The Council may use the damage costs in considering the appropriate scale and kind of mitigation that is required to make certain major schemes acceptable in terms of air quality. The overall benefit of the scheme will be taken into account in taking decisions about whether proposals are acceptable. The calculation should utilise the most recent Defra Emissions Factor Toolkit[21] to estimate the additional pollutant emissions from a proposed development and the latest Defra IGCB Air Quality Damage Costs for the specific pollutant of interest, to calculate the resultant damage cost[22]. The calculation process includes:

- Identifying the additional trips generated by the proposal (from the Transport Assessment);
- The emissions calculated for the pollutants of concern (NO_x and $PM_{2.5}$) [from the Emissions Factor Toolkit];
- The air quality damage costs calculation for the specific pollutant emissions (from DEFRA IGCB);
- The result is totalled for a five-year period to enable mitigation implementation. Where there is long development build out

[20] https://laqm.defra.gov.uk/technical-guidance/
[21] https://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html
[22] www.gov.uk/guidance/air-quality-economic-analysis

programmes, we may require the developer to consider a longer period than 5 years where construction activity is likely to be intensive.

5.25 The calculation is summarised below. Further information can be obtained from the Council Environmental Health Officers. Should there be no net increase in trips arising from a development scheme then the damage costs are zero. Further information on damage costs can be found in Appendix C.

Road Transport Emission Increase =

Σ [Estimated trip increase for 5 years X Emission rate per 10 km per vehicle type X Damage Costs]

Stage 3 – Mitigation and Off-setting

5.26 It is important that emissions from proposed development are minimised during the design stage. Development proposals should set out what these measures are and how they will be implemented.

5.27 Where mitigation is not integrated into a proposal, we will require this through planning conditions. The NPPF (paragraph 33) states that "Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)." If on-site mitigation is not possible then the Council will seek compensation for the identified air quality impacts through a Section 106 agreement or similar agreement.

5.28 Default mitigation measures are presented for each type of proposal that demonstrate a minimum requirement. This is not an exhaustive list, but a suggested suite of measures and will be adapted for particular locations and needs identified by the Council. We welcome the opportunity to work with developers to devise innovative measures that will lead to improving local air quality.

5.29 Type 1 mitigation is listed in Table 2 – Type 1 Mitigation and Types 2 and 3 are listed in Table 3 – Type 2 Mitigation and Table 4 – Type 3 Mitigation respectively.

5.30 Due to elevated concentrations of PM in the Borough, Medium and Major developments will be required to implement suitable abatement controls for the use of non-road mobile machinery (NRMM) – Table 5 – Non Road Mobile Machinery (NRMM) Controls.

5.31 The following tables provide a suite of measures to be considered where appropriate

Table 2 – Type 1 Mitigation

Plug-in Vehicle Re-Charging: All charging units shall be installed where practical to do so. Developers installing public charging points shall ensure that the National Charge Point Registry[23] is updated. Proposals should be in line with Warwickshire County Council's electric vehicle charging infrastructure strategy 2017-2026[24]. For further information about EV charging points contact the Nuneaton and Bedworth Borough Council Environmental Health team and Warwickshire County Council Transport team. Residential: 1 charging point per dwelling with dedicated parking (16amp) or 1 charging point per 10 spaces (unallocated parking) and ensure appropriate cabling is provided to enable increase for future provision. Commercial/Retail: 10% of parking spaces (32 amp) which may be phased with 5% initial provision and the remainder at an agreed trigger level. At least 1 charging unit should be provided for every 10 disabled parking spaces. Where 50 parking spaces or more are provided then 1 rapid charging unit (43kW/50kW) per 50 spaces shall also be considered and parking time limited to a maximum of 1 hour for public access car parks. Industrial: 10% of parking spaces which may be phased with 5% initial provision and the remainder at an agreed trigger level. At least 1 charging unit should be provided for every 10 disabled parking spaces. Where 50 parking spaces or more are provided then 1 rapid charging unit (43kW/50kW) per 50 spaces shall also be considered and parking time limited to a maximum of 1 hour. Low NOx Heating and Boilers (see the Specific Issues section) Code of Construction Practice

[23] www.national-charge-point-registry.uk
[24] https://apps.warwickshire.gov.uk/api/documents/WCCC-930-349

Construction Environmental Management Plan (CEMP) to be incorporated into MEDIUM and MAJOR developments and agreed with Council Officers, usually via the Discharge of Planning Conditions. This shall include NRMM controls (see Table 5 – Non Road Mobile Machinery (NRMM) Controls)

Green Infrastructure and Planting
Where it can be shown that such infrastructure will reduce exposure from air pollution.

5.32 The following tables provide a suite of measures to be considered where appropriate.

Table 3 – Type 2 Mitigation

Example mitigation measures:

- Monitored Travel Plan, including mechanisms for discouraging high emission vehicle use and encouraging the uptake of low emission fuels and technologies[25]
- Measures to support public transport infrastructure and promotion of its use
- Measures to support cycling and walking infrastructure
- Measures to support an Electric Vehicle Plan
- Designated parking spaces and differentiated parking charges for low emission vehicles
- Non-road mobile machinery (NRMM) controls (see Table 5)
- Measures provided in the Council's Air Quality Action Plan (AQAP)[26] or Local Air Quality Strategy
- Commercial development specific:
    - Use reasonable endeavours to use/require vehicle use complying with the latest European Emission Standard
    - Provide a fleet emission reduction strategy/Low Emission Strategy, including low emission fuels and technologies, including ultra-low emission service vehicles

[25] Where the developer funds the monitoring of a travel plan
[26] www.nuneatonandbedworth.gov.uk/info/20081/pollution/186/pollution/4

Table 4 – Type 3 Mitigation

Off-set mitigation to support:
• Implementation of measures in the Council's AQAP • Growth in low and ultra-low emission public transport, including buses • Electric Vehicle Plans • Car clubs (including electric) and car sharing schemes • Cycling Hubs and corridors, including bike and e-bike hire • Plugged-in development and demonstration schemes e.g. new occupants given demonstration use of plug-in vehicles • Low emission waste collection services • Infrastructure for low emission, alternative fuels e.g. refuse collection and community transport services

5.33 Further information on the suitability of mitigation measures for developments can be obtained from the Council Environmental Health Team and through pre-application discussions.

Table 5 – Non Road Mobile Machinery (NRMM) Controls

NRMM of net power between 37kW and 560kW will be required to meet the standards based upon the engine emissions standards in EU Directive 97/68/EC and its subsequent amendments. This will apply to both variable and constant speed engines for both NOx and PM. These standards are: (a) NRMM used on the site of any MEDIUM or MAJOR classified development in the built-up areas will be required to meet Stage IV as a minimum. (b) Variable speed engines smaller than 56 kW and constant speed engines such as generators will be required to meet Stage V. All eligible NRMM should meet the standards above unless it can be demonstrated that machinery meeting these standards is not available.

Assessing the Acceptability of a Scheme

5.34 We will determine the acceptability of a scheme and its location based on the outcome of the air quality assessment, the provision of appropriate on-site mitigation, and where required off-set mitigation.

5.35 While applicants may present evidence as to the significance of scheme impacts or the impact of air quality on a scheme, we reserve the right to determine the acceptability of an application based on local air quality knowledge and the cumulative impacts of schemes. A key test will be evidence that the development proposals have minimised emissions at the design stage (e.g. avoided the use of gas boilers), and that it is appropriately located to reduce exposure to air pollution, particularly for vulnerable groups of the population.

5.36 Failure to meet the requirements in this guidance may result in the application being delayed as the Council may request extra information, amendments or conditions to the application. If the issues remain, planning permission will not normally be granted.

Specific Issues

Heating and Power

5.37 Ideally new development will use electricity for water and space heating. In exceptional circumstances, if gas boilers are required, they should meet the following emission standards.

5.38 Heating plant on developments outside of the built-up areas:

- Individual gas fired boiler <40mg NO_x/kWh
- Spark ignition engine 95mg NO_x/Nm^3
- Compression ignition engine 400mg NO_x/Nm^3
- Gas turbine 20mg NO_x/Nm^3

5.39 It should be noted that all plant permitted under the Pollution Prevention and Control Act 1999 and the Environmental Permitting Regulations 2016 (as amended), including CHP plant with 20 MW_{th} input or above, will need to comply with the emission standards set through the permitting process and the planning system cannot set alternative standards. This means that, based on the permitted emissions of such plant, the Council will need to decide whether such schemes are an acceptable use of the application site depending on their impact on air quality.

Biomass Boilers

5.40 Biomass boilers should not be used in new development, as they are significantly more polluting locally than the use of electricity.

Flues for Combustion Plant

5.41 The location and emission discharge velocity of all exhaust flues should be designed to ensure maximum dispersion of pollutants. All combustion plant flues must be vertical and must terminate above the roof height of the tallest part of the development, unless agreed with the Environmental Health Team. There should be no nearby obstruction(s) that could influence dispersion.

5.42 Flues and exhaust vents should be at least 3 m away in all directions from any area the public can access. This includes recreational areas such as open spaces, roof terraces, balconies and gardens. They should also be located away from any air intake points to avoid ingress into a ventilation system. Flues in lightwells or atria will not be approved.

5.43 Consideration also needs to be given to the impact of emission exhausts on neighbouring properties and on the development.

Domestic Wood Burning

5.44 Domestic wood burning is increasingly an important source of PM2.5 pollution. Therefore, new houses should not include chimneys or flues for open fires or wood burning stoves.

Commercial Kitchens

5.45 Electric cooking appliances should be used where possible. All commercial cooking extraction flues should be located away from any air intake points and should terminate above the roof height of the tallest part of the development or use sufficient abatement to ensure no impacts.

5.46 Kitchen ventilation and extraction must be designed to mitigate particulate emissions and odour.

Standby / Back-up Power Generation

5.47 All standby/back-up power generation applications, including schemes regulated by the Environment Agency, will require a full air quality assessment to assess the acceptability of the site for such a scheme.

5.48 We expect all such assessments to include reasoning regarding the choice of energy supply to encourage the use of alternatives to diesel fuelled generators.

5.49 Any diesel-powered generators will be required to incorporate abatement equipment such as selective catalytic reduction and particulate trap (SCRT) and demonstrate that they do not add to local air pollution.

Permitting under the Pollution Prevention and Control Act 1999 and the Environmental Permitting Regulations 2016 (as amended)

5.50 Industrial processes which may range from large industrial plant to dry cleaners and paint spraying workshops, are regulated by the Environment Agency (Part A1 processes) and the Borough Council (Part A2 and Part B processes). The planning regime must assume that the permitting regime will ensure the processes comply with their permits and the Act. The planning regime can, however, consider whether a land use is appropriate and it must consider the exposure to pollutants.

5.51 All Part A and B Process developments requiring planning applications and where NO_x and PM emissions are relevant will be required to carry out a detailed air quality assessment

Mechanical Ventilation

5.52 Air quality concentrations may affect the suitability of certain locations for sensitive developments, and this should be assessed in line with section Stage 2 Air Quality Assessment.

5.53 Some applications in areas of poor air quality have proposed mechanical ventilation as a solution to overcoming potential exposure to poor air quality. This may involve sealed windows / triple glazing with trickle vents and a forced ventilation system, incorporating filters to remove pollutants.

5.54 Sensitive development should incorporate the following considerations:

5.55 The sensitive development should be at least 20m from the kerb, with living space away from the road

- Take account of the height separation of living accommodation from a road source e.g. can residential dwellings be provided from floors 2 / 3 upwards with commercial premises at lower levels
- The use of green infrastructure to provide a barrier to an adjacent pollution source (see the Green Infrastructure and Planting section) where it is practical to do so
- Reduce the potential for internal pollution, for example by replacing gas cooking with electric cooking provision

- Provision of monitoring data to support applications for sensitive developments. This requirement should be agreed with the Environmental Health Team prior to commencement of monitoring

5.56 Where the above considerations cannot achieve acceptable exposure for a sensitive development then consideration should be given to the refusal of the scheme.

Green Infrastructure and Planting

5.57 Plants and trees may provide an aesthetically pleasing aspect to a scheme and can be used to provide a barrier from a pollutant source such as a heavily trafficked road.

5.58 While there is conflicting evidence as to whether green infrastructure can help reduce concentrations of NO_2, it is acknowledged that certain types of shrubs and trees can be effective at removing PM from the atmosphere. Whilst also increasing pollutant dispersion and providing a barrier to pollutant sources, such as heavily trafficked roads

5.59 For example, a living wall or a framework for climbing plants may offer some protection between a pollution source such as a road and a dwelling. Additionally, certain types of trees such as varieties of pine, planted between a road and residential accommodation may help reduce exposure to PM

5.60 Careful consideration is needed as to the type of green infrastructure to be used. Certain tree species can produce their own emissions, which may exacerbate air pollution, such as, isoprenes, which may exacerbate air pollution. Furthermore, the retention of existing green infrastructure such as mature trees, on or around a site should be encouraged where appropriate.

5.61 Proposals that incorporate green infrastructure into scheme design should liaise with the Council's Park and Parks and Green Spaces team and Warwickshire County Council's Transport team and provide evidence as to the suitability of the species chosen.

Section 106 Agreements and Community Infrastructure Levy (CIL)

5.62 The Council will seek Section 106 Agreements (S106) (Town and Country Planning Act 1990) and other relevant obligations with developers to secure mitigation, including off-setting emissions, on larger schemes ('Medium' and 'Major'), where appropriate, to make the scheme acceptable.

5.63 S106 Agreements will only be sought where the following tests are satisfied:

- necessary to make the development acceptable in planning terms
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

5.64 Where the Council adopts a CIL schedule that specifies contributions towards air quality infrastructure, this will be considered as part of negotiating wider developer contributions to avoid any issue of double counting.

Appendix A - Department for Transport Criteria for Transport Assessments

A.1 These thresholds are for guidance purposes and should not be read as absolutes. It should also be noted that this guidance has now been archived[27].

Land Use	Description	TA Required (medium or major threshold in table 1)
Food Retail (A1)	Retail sale of food goods to the public – supermarkets, superstore, convenience food store	>800 m^2
Non-Food Retail (A1)	Retail sale of non-food goods to the public; but includes sandwich bars or other cold food purchased and consumed off site	>1500 m^2
Financial and professional services (A2)	Banks, building societies and bureaux de change, professional services, estate agents, employment agencies, betting shops.	>2500 m^2
Restaurants and Cafes (A3)	Use for the sale of food for consumption on the premises.	>2500 m^2
Drinking Establishments (A4)	Use as a public house, wine-bar for consumption on or off the premises.	>600 m^2
Hot Food Takeaway (A5)	Use for the sale of hot food for consumption on or off the premises.	>500 m^2
Business (B1)	(a) Offices other than in use within Class A2 (financial & professional). (b) Research & development – laboratories, studios. (c) Light industry	>2500 m^2
General industrial (B2)	General industry (other than B1).	>4000 m^2
Storage or Distribution (B8)	Storage or distribution centres – wholesale warehouses, distribution centres & repositories.	>5000 m^2
Hotels (C1)	Hotels, boarding houses & guest houses	>100 bedrooms

[27] http://webarchive.nationalarchives.gov.uk/20100409053422/http://www.dft.gov.uk/adobepdf/165237/202657/guidanceontaappendixb

Land Use	Description	TA Required (medium or major threshold in table 1)
Residential Institutions (C2)	Hospitals, nursing homes used for residential accommodation and care.	>50 beds
Residential Institutions (C2)	Boarding schools and training centres	>150 students
Residential institutions (C2)	Institutional hostels, homeless centres.	>400 residents
Dwelling Houses (C3)	Dwellings for individuals, families or not more than six people in a single household.	>80 units
Non-Residential Institutions (D1)	Medical & health services, museums, public libraries, art galleries, non-residential education, places of worship and church halls.	>1000 m^2
Assembly and Leisure (D2)	Cinemas, dance & concert halls, sports halls, swimming, skating, gym, bingo, and other facilities not involving motorised vehicles or firearms.	>1500 m^2
Other		
1. Any development generating 30 or more two-way vehicle movements in any hour		
2. Any developments generating 100 or more two-way vehicle movements per day		
3. Any development proposing 100 or more parking spaces		
4. Any development generating significant freight or HGV movements per day, or significant abnormal loads per day		
5. Any development proposed in a location where the local transport infrastructure is inadequate		
6. Any development proposed in a location within or adjacent to an Air Quality Management Area (AQMA)		

Appendix B - Air Quality Assessment Protocol to Determine the Impact of Vehicle Emissions from Development Proposals

B.1 An air quality assessment should clearly establish the likely change in pollutant concentrations at relevant receptors resulting from the proposed development during both the construction and operational phases. It must take into account the cumulative air quality impacts of committed developments (i.e. those with planning permission and those allocated in the Borough Plan).

B.2 An air quality assessment should consider NO_x, PM_{10} and $PM_{2.5}$ emissions and NO_2, PM_{10} and $PM_{2.5}$ concentrations.

Key Components of an Air Quality Assessment

B.3 The assessment will require dispersion modelling utilising agreed monitoring data, traffic data and meteorological data. The modelling should be undertaken using recognised, verified local scale models by technically competent and experienced personnel and in accordance with the most recent version of Local Air Quality Management Technical Guidance (at the time of writing it was LAQM TG(22), last updated May 2025[28]). The study will comprise of

1. The assessment of the existing air quality in the study area for the baseline year with agreed receptor points and validation of any dispersion model;

2. The prediction of future air quality without the development in place (future baseline or do-nothing);

3. The prediction of future emissions and air quality with the development in place (with development or do-something).

4. The prediction of future emissions and air quality with the development (with development or do-something) and with identified mitigation measures in place. Assessment of the exposure to users of the development.

B.4 The assessment report should include the following details:

A. A detailed description of the proposed development, including:

- Identify any on-site sources of pollutants;

- Overview of the expected traffic changes;

[28] laqm.defra.gov.uk/wp-content/uploads/2021/03/LAQM-TG22-May-25-v2.1.pdf

- The sensitivity of the area in terms of recognised health-based criteria, which currently includes of WHO air quality guidelines. Air Quality Objectives, Limit Values and $PM_{2.5}$ targets.;
- Local receptors likely to be exposed;
- Pollutants to be considered and those scoped out of the process.

B. The relevant planning and other policy context for the assessment.

C. Description of the relevant air quality criteria used

D. The assessment method including details of the model, input data, assumptions model performance:

5.65 For traffic assessment;

- Traffic data used for the assessment;
- Emission data source;
- Meteorological data source and representation of area;
- Baseline pollutant concentration including any monitoring undertaken;
- Background pollutant concentration;
- Choice of base year;
- Basis for NO_x:NO_2 calculations; and
- Model performance statistics.

5.66 For point source assessments:

- Type of plant;
- Source of emission data and emission assumptions;
- Stack parameters – height, diameter, emission velocity and exit temperature;
- Meteorological data source minimum 3 years, ideally 5 years) and representation of area;
- Baseline pollutant concentrations;

- Background pollutant concentrations;
- Choice of baseline year;
- Basis for deriving NO_2 from NO_x.

E. Model verification for all traffic modelling following DEFRA guidance LAQM.TG (22):

F. Identification of sensitive locations:

G. Description of baseline conditions:

H. Description of demolition/construction phase impacts:

I. Summary of the assessment results:

- Impacts during the demolition/construction phase;
- Impacts during the operation phase;
- The estimated emissions change of local air pollutants;
- Identified breach or worsening of exceedances of objectives (geographical extent)
- Whether Air Quality Action Plan is compromised;
- Apparent conflicts with planning policy and how they will be mitigated.
- Uncertainties, errors and verification

J. Mitigation measures

Air Quality Monitoring

B.5 In some cases, it will be appropriate to carry out a short period of air quality monitoring as part of the assessment work. This will help where new exposure is proposed in a location with complex road layout and/or topography, which will be difficult to model or where no data is available to verify the model. Monitoring should be undertaken for a minimum of three months using agreed techniques and locations with any adjustments made following Defra technical guidance LAQM.TG (22).

Assessing Demolition/Construction Impacts

B.6 The demolition and construction phases of development proposals can lead to both nuisance dust and elevated fine particulate (PM_{10} and $PM_{2.5}$) concentrations. Modelling is not appropriate for this type

of assessment, as emission rates vary depending on a combination of the construction activity and meteorological conditions, which cannot be reliably predicted. The assessment should focus on the distance and duration over which there is a risk that impacts may occur. The Institute of Air Quality Management (IAQM)[29] has produced a number of documents to which this guidance refers. The document `Guidance on the Assessment of the Impacts of Construction on Air Quality and the Determination of their Significance'[30] should be the reference for reporting the construction assessment.

Cumulative Impacts

B.7 The NPPF 2024 recognises that a number of individual development proposals within close proximity of each other require planning policies and decisions to consider the cumulative impact of them. Difficulties arise when developments are permitted sequentially, with each individually having only a relatively low polluting potential, but which cumulatively result in a significant worsening of air quality. This will occur where:

- A single large site is divided up into a series of units, such as an industrial estate or retail park;
- A major development is broken down into a series of smaller planning applications for administrative ease; and
- There are cumulative air quality impacts from a series of unrelated developments in the same area.

B.8 The first two cases the cumulative impact will be addressed by the likelihood that a single developer will bring forward an outline application for the whole site which should include an air quality assessment as part of an Environmental Assessment. For major developments that are broken down into a series of smaller planning applications, the use of a `Master or Parameter Plan' that includes an air quality assessment will address the cumulative impact.

[29] https://iaqm.co.uk
[30] https://iaqm.co.uk/wp-content/uploads/2013/02/Construction-Dust-Guidance-Jan-2024.pdf

Appendix C – Damage Costs: Calculations and Example

C.1 Damage costs are an estimate of the costs to society (mainly due to health impacts) per tonne of pollutant emitted. They provide an easy reckoning of the monetised value of changes in pollution. The Government publishes damage costs for NOx and PM and also provides an Emission Factor Toolkit to allow the calculation of the emissions from road transport in future years which takes account of the changing fleet composition (e.g. the increase in electric vehicles).

C.2 Applicants calculating damage costs should use the following:

- The most recent version of the Emission Factor Toolkit
- Both NO_x and PM to be considered
- Appropriate HGV % traffic split
- Traffic speed of 30 km/hour
- The appropriate damage cost category as advised by the Council Environmental Health Team

C.3 The following example outlines the damage cost calculation process for an urban mixed-use development outside London, to be operational in 2026, including residential development in 2 blocks and a hotel. The assessment considers both transport emissions and building emissions from on-site combustion plant. The trip generation for the residential scheme is low due to less than 50% parking provided per dwelling, including 25% provision of electric vehicle charging points (and a further 25% potential) and cycle stores. The hotel scheme includes 100+ space parking provision. Service deliveries to both the residential and hotel scheme are also considered.

C.4 The scheme is categorised as 'outer conurbation (not London)' for damage costs. The distance used in the Predicted Yearly Emissions calculation is estimated at 5,000 km/year, as per the average distance travelled by car in England in 2024 being 4,719 km.[31]

C.5 Step 1 – Using the trip increase for each aspect of the scheme calculate the annual emissions of NO_x and PM (in tonnes) for each of the 5 years from opening.

[31] Average number of trips, stages, miles and time spent travelling by mode: England, 2002 onwards

	Projected yearly emissions (Defra Emission Factor Toolkit v8, rounded).				
	2026	2027	2028	2029	2030
Transport					
Residential NO_x (kg)	67.4	59.0	51.1	43.8	37.3
Residential PM (kg)	6.6	6.5	6.3	6.2	6.1
Hotel NO_x (kg)	256.5	224.6	194.9	167.6	143.2
Hotel PM (kg)	24.8	24.3	23.8	23.4	23.1
Deliveries NO_x (kg)	183.9	161.1	139.9	120.6	103.4
Deliveries PM (kg)	17.6	17.2	16.9	16.6	16.4
Total Transport Nox (tonnes)	0.5	0.4	0.4	0.4	0.3
Total Transport PM (tonnes)	0.05	0.05	0.05	0.05	0.05
Building emissions					
Residential NO_x (kg)	104.6	100.4	96.4	92.2	88.4
Residential PM (kg)	0.4	0.4	0.4	0.4	0.4
Hotel NO_x (kg)	167.8	163.5	159.6	155.3	151.4
Hotel PM (kg)	0.5	0.51	0.5	0.5	0.5
Total Building NO_x (tonnes)	0.3	0.3	0.3	0.3	0.2
Total Building $PM_{2.5}$ (tonnes)	0.0009	0.0009	0.0009	0.0008	0.0008

C.6 Step 2 – Using the selected damage cost category, uplift the 2025 prices provided by the IGCB by 2% per annum to reflect the correct

cost in each of the first 5 years from opening. This example uses the damage cost values of 'Road Transport Urban Large' for transport and 'Domestic Urban Large' for the building portions of the development for 2025. The calculation used is as follows:

Total = {(E + J + O + T) x [(1+0.02)30 –1]}/0.02

	Benchmark (tonnes/ annum)	Total predicted emissions (tonnes/ annum)	Excess emissions[32] (tonnes/ annum)	Damage cost (£/tonne)	Annual offsetting amount (£)
Building NO_x emissions	A[33]	B	C = (B-A)	D	E = (C x D)
Building $PM_{2.5}$ emissions	F	G	H = (G-F)	I	J = (H x I)
Transport NO_x emissions	K	L	M = (L-K)	N	O = (M x N)
Transport $PM_{2.5}$ emissions	P	Q	R = (Q-P)	S	T = (R x S)

[32] If the figure is less than 0, it should be entered as zero in the table. It is not permitted to use good performance against one benchmark to offset exceedances of another benchmark.

[33] For the purposes of offsetting, any NOx emissions from solid/liquid fuels will be assumed to have a benchmark of 0

Example: Price per tonne of pollutant in projected years (Defra IGCB) (rounded)						
	2025	2026	2027	2028	2029	2030
NOx Road Transport Urban Large	£14,307	£14,593	£15,183	£16,112	£17,440	£19,255
$PM_{2.5}$ Road Transport Urban Large	£122,869	£125,326	£130,390	£138,370	£149,777	£165,366
NOx Domestic Urban Large	£17,188	£16,851	£17,532	£18,605	£20,138	£22,235
$PM_{2.5}$ Domestic Urban Large	£143,176	£146,040	£151,940	£161,239	£174,538	£192,696

C.6 Step 3 – Multiply the tonnage of emissions for each pollutant by the damage cost price for each year. Provide a cumulative total for 5 years. The table below presents both the annual totals and the cumulative total over the five-year period.

Example: Damage Costs (rounded to nearest £)					
	2026 (year 1)	2027	2028	2029	2030 (year 5)
NOx Road Transport Urban Large	£7,410	£6,752	£6,217	£5,791	£5,467
$PM_{2.5}$ Road Transport Urban Large	£6,148	£5,982	£6,518	£6,938	£7,548
NOx Domestic Urban Large	£4,589	£4,626	£4,763	£4,983	£5,332
$PM_{2.5}$ Domestic Urban Large	£134	£136	£141	£148	£160
Total (annual)	£18,281	£17,496	£17,639	£17,860	£18,507
Total (cumulative)	£18,281	£35,777	£53,416	£71,276	£89,783

Glossary

AADT	Annual average daily traffic flows
AMCT	Annual mean concentration target
Air Quality Assessment (AQA)	An assessment of the impact of a development on the levels of certain pollutants in the local area and the impact of pollution levels on future occupants.
Air Quality Management Areas (AQMAs) [34]	Areas where the air quality objectives are likely to be exceeded. Declared by way of an order issued under the Section 83(1) of the Environment Act 1995.
Air Quality Objectives	Air quality targets to be achieved locally as set out in the Air Quality Regulations 2000 and subsequent Regulations. Objectives are expressed as pollution concentrations over certain exposure periods, which should be achieved by a specific target date. Some objectives are based on long-term exposure (e.g. annual averages), with some based on short-term objectives. Objectives only apply where a member of the public may be exposed to pollution over the relevant averaging time.
Biomass boiler	System of heating where biomass, usually wood or wooden pellets, are used as the fuel
Construction Environmental Management Plan (CEMP)	Construction Environmental Management Plan – used to manage and minimise environmental impacts from construction and demolition.
Clean Air Zones (CAZ)	Zone implemented by a local authority setting nationally set emission standards for vehicles. Non-charging zones can be implemented through policies covering bus and taxi emissions. Charging zones require non-compliant lorries and possibly vans to pay a charge to enter the zone.
CHP	Combined heat and power
Damage Costs	Damage Costs are a simple way to value changes in air pollution. They estimate the cost to society of a change in emissions of different pollutants
Defra	Department for Environment, Food and Rural Affairs

[34] https://uk-air.defra.gov.uk/aqma

Emission Factor Toolkit	On-line toolkit provided by Defra to calculate emissions from road transport vehicles in current and future years
Environmental Impact Assessment (EIA)	Assessment required for projects specified in Environmental Impact Assessment Directive. Governed by the Town & Country Planning (Environmental Impact Assessment) Regulations 2017
EU Limit Value	Legally binding pollutant concentration limit
Euro Standards	European Emission Standard (progressively tightened emission standards for vehicles. Euro Standards for cars and small vans are stated in Hindu-Arabic numbers and HDVs in Roman numerals)
Exceedance	Concentrations of a specified air pollutant greater than the appropriate Air Quality Objective or EU Limit Value
Exceedance area	Area where concentrations of a specified air pollutant greater than the appropriate Air Quality Objective or EU Limit Value
HDV	Heavy Duty Vehicle (lorry or bus greater than 3.5 tonnes gross vehicle weight)
IGCB	Interdepartmental Group on Costs and Benefits led by the (Defra)
LAQM.TG(22)	Defra's Local Air Quality Management Technical Guidance (2022). This document provides national advice on how local authorities should assess air quality.
LETCP	Low Emission Towns & Cities Programme[35] – joint programme between all 7 West Midlands Metropolitan Authorities to produce the West Midlands Low Emission Vehicle Strategy (LEVS), including good practice guidance on planning and procurement
Low Emission Strategy (LES)	Overarching strategy to integrate policies and practices to achieve year on year vehicle emission reductions, optimising opportunities for national funding assistance
Low Emission Zone (LEZ)	Council area in which emission standards apply for either road transport vehicles or power generation/industrial emissions. The council can set emission standards that differ in standard and scope from the Government requirements for implementing Clean Air Zones for vehicles

[35] https://go.walsall.gov.uk/low_emissions_towns_and_cities_programme

LDV	Light duty vehicle (car or small van less than 3.5 tonnes gross vehicle weight
Limit Values/EU limit values	The maximum pollutant levels set out in the EU Daughter Directives on Air Quality. In some cases, the limit values are the same as the national air quality objective but may allow a longer period for achieving.
Mitigation	Mitigation measures will minimise, but not necessarily remove, the impact of or effect of poor air quality on a development
National Air Quality Objectives	See Air Quality Objectives
National Air Quality Plan	Government Plan to improve roadside concentrations of nitrogen dioxide (July 2017)[36]
Non-road mobile machinery (NRMM)	Diggers, cranes, bulldozers, plant etc used on construction sites
NO_2	Nitrogen dioxide
NO_x	Nitrogen oxides, which includes nitric oxide and nitrogen dioxide. Most pollution sources emit nitrogen oxides primarily as nitric oxide. However, once in the atmosphere nitric oxide can be converted to nitrogen dioxide. Therefore, it is important to know the concentrations of both NO_x and NO_2.
Offsetting	Measures which 'compensate' for anticipated increases in pollution in the area but not necessarily at the same locality. This might be for example by funding more general measures in the air quality action plan/Local Air Quality Strategy.
PM	Particulate matter
$PM_{2.5}$	Particulate matter with a diameter of 2.5 microns or less
PM_{10}	Particulate matter with a diameter of 10 microns or less.
Part A1 and A2 Processes	Industrial processes which are regulated under the Pollution Prevention and Control (PPC) Regulations and subsequent Integrated Pollution Prevention and Control (IPPC) for emissions to all media (i.e. atmosphere, land and water).
Part B Processes	Industrial processes which are regulated under the Local Air Pollution Control (LAPC) and Local Air Quality Pollution Prevention and Control (LAPPC) Regulations for emissions to air only.

[36] www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017

Point sources	Chimneys
Polluting development	A development which will directly or indirectly increase levels of relevant pollutants. This may include industrial processes but may also include developments which could cause increased traffic emissions.
PERT	Population exposure reduction target
Road canyon	A road which is flanked by buildings on both sides, creating a canyon-like environment that can inhibit the dispersion of pollutants
SCR	Selective Catalytic Reduction – abatement equipment on vehicles to reduce NO_x emissions. Requires the addition of urea (commercially known as AdBlue)
SCRT	SCR and continuous regeneration technology (soot / particulate filter)
Sensitive development	A development which would allow users of the site to potentially be exposed to pollutants above the objective for the relevant period. For example, the introduction of a new residential development into an area where an air quality objective is already exceeded, would create the potential for the exposure of residents to poor air quality above the objective. Incidentally, this type of development may also generate significant additional traffic flow and also be a polluting development.
Standby generator	Back-up electrical generator that automatically starts up and provides power following a utility outage

This document has been published by Nuneaton and Bedworth Borough Council

September 2026

planning.policy@nuneatonandbedwrth.gov.uk

Schedule of Additional Trigger Criteria for Major Air Quality Developments

This schedule sets out the additional trigger criteria used to determine whether a proposed major development requires an Air Quality Assessment. Meeting any single threshold listed below will trigger this requirement.

- Proposals in areas where sustained compliance with EU Limit Values may be at risk[1]
- Any development proposing a net increase of 100 or more parking spaces
- Any development that could increase the existing traffic flows on roads of > 10,000 Annual Average Daily Traffic (AADT) by 5% or more
- Any development that causes a change in Light Duty Vehicles (cars and small vans) flows of:
  - more than 100 AADT within or adjacent to an AQMA, CAZ or exceedance area
  - more than 500 AADT elsewhere
- Any developments that could increase traffic flows by 5% or more in road canyons (or creates a canyon) with > 5,000 AADT
- Any development that causes a change in Heavy Duty Vehicle (HDV) flows (lorries, large vans and buses) of:
  - more than 25 AADT within or adjacent to an AQMA, CAZ or exceedance area
  - more than 100 AADT elsewhere
- Proposals that could introduce or significantly alter congestion and includes the introduction of substantial road infrastructure changes
- Proposals that reduce average speeds by more than 10 km per hour
- Proposals that include additional HGV movements by more than 10% of total trips
- The construction, widening or repositioning of a road in the vicinity of sensitive receptors[2]
- Where significant demolition and construction works are proposed[3]

[1] Where current monitoring data shows NO_2 annual average concentrations of 36 ug/m3 or more
[2] See section Stage 2 - Air Quality Impact Assessment
[3] Significance determined by professional judgement based on scale of works and proximity of sensitive receptors

- Where a centralised combustion unit of thermal input >300kWh is proposed
- All biomass boiler applications
- All stand-by/short-term power generation units regulated by the Environment Agency

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 7

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Cabinet

Date of Meeting: 4 November 2026

Subject: Endorsement of Warwickshire Local Nature Recovery Strategy

Portfolio: Planning, Enforcement and Public Services

Responsible Officer: Assistant Director - Planning

Corporate Plan – Theme: Green Spaces and Environment

Corporate Plan – Aim: Explore opportunities to promote, protect and enhance biodiversity in the Borough.

Ward Relevance: All

Public or Private: Public

Amendment to Budget: No Council Tax Related: No

Recommendation to Council: No

Forward Plan: Yes

Subject to Call-in: Yes

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1. Purpose of Report

1.1 A Local Nature Recovery Strategy (LNRS) sets out to help reverse the decline of nature by identifying the best places to protect, restore and connect habitats across England. The

purpose of this report is to introduce the Warwickshire Local Nature Recovery Strategy (LNRS) to Cabinet and to inform Cabinet of its purpose and its status.

1.2 This report recommends that Cabinet agrees to endorse the LNRS in the context of the Nuneaton and Bedworth Borough Council's (NBBC) role as a Supporting Authority. It also recommends that Cabinet note the context of the report and recognise the LNRS as a material planning consideration for planning officers in the planning decision making process and in plan-making.

1.3 The report also seeks approval from Cabinet to publish the LNRS on the Council's website.

2. Recommendations

2.1 That Cabinet agree to endorse the LNRS (Appendix A) in NBBC's role as Supporting Authority.

2.2 That Cabinet note the context of this report and recognise the LNRS as a material planning consideration in the planning decision making process and in plan-making.

2.3 That Cabinet approve the publication of the LNRS on the Council's website.

3. Background

3.1 Local Nature Recovery Strategies are statutory plans introduced by the Environment Act 2021 to support nature recovery and environmental improvement by identifying the actions and locations which have had the greatest impact.

3.2 The main statutory requirements of an LNRS are that it must:

a) Agree priorities for nature's recovery

b) Prepare a 'Local Habitat Map' to identify the most valuable existing areas for nature, and

c) Provide a Local Habitat Map which identifies specific Measures for creating or improving habitat for nature and which also contribute wider environmental benefits.

3.3 The Secretary of State for Environment, Food and Rural Affairs (SoS) appointed 48 Responsible Authorities to lead on preparing a LNRS for their area. In Warwickshire, the LNRS has been developed by Warwickshire County Council (WCC) who were appointed as a Responsible Authority under section 105 of the Environment Act 2021 with a duty to prepare and publish a LNRS.

NBBC's role as a 'Supporting Authority'

3.4 Under the Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023, supporting authorities, including local planning authorities and Natural England, have a statutory role in the preparation of a LNRS. The Responsible Authority must take reasonable steps to involve supporting authorities in the development of the strategy, provide them with relevant information, and have regard to their views during its preparation. Following adoption, supporting authorities do not have ownership of the LNRS and are they not responsible for its formal adoption. However, supporting authorities are important delivery partners and should have regard to the strategy, where relevant, in the exercise of their functions, including biodiversity, land-use and planning related activities.

3.5 NBBC, as a Supporting Authority, has worked with WCC throughout the development of the LNRS, by helping to review and shape the strategy, support engagement, and align local actions to aid nature recovery.

3.6 Going forward, the LNRS will help inform the preparation of planning policies within the new Local Plan, support the identification of opportunities for biodiversity enhancement and green infrastructure and assist in securing appropriate mitigation, compensation and biodiversity net gain through the planning process. In decision-making, the LNRS will be a

material consideration that helps ensure development proposals contribute positively to nature recovery objectives.

4. Body of report and reason for recommendations

Purpose of the Warwickshire LNRS

4.1 The Warwickshire LNRS is a web based strategy designed to empower and enable everyone and every organisation in Warwickshire to collectively contribute positively and meaningfully to nature's recovery locally and nationally. It does not create new planning restrictions, alter land designations, allocate development sites or impose new obligations on landowners. Instead, it provides a coordinated county-wide approach to biodiversity recovery which NBBC will be expected to take into account when exercising its planning and environmental functions.

4.2 In summary, a LNRS is a map[1], or series of mapped data, and an accompanying narrative report setting out what is planned, where, and why. The main purpose of an LNRS is to identify locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment. The strategies do not force the owners and managers of the land identified to make any changes. Instead, the Government is encouraging action through, for example, opportunities for funding and investment.

4.3 In terms of what a LNRS can achieve its important to distinguish between what the LNRS can do and can't do. The Warwickshire LNRS will:

- Identify locations and activities that will have the biggest impact to improve nature recovery over this first iteration of the LNRS (envisaged to be 8 years).
- Be used by local authorities when developing planning strategies and to inform decision making.

[1] https://maps.warwickshire.gov.uk/LNRS/

- Be used to incentivise locations for habitat creation within Biodiversity Net Gain implementation.
- Continue to support nature recovery actions in Nature Improvement Areas.
- Provide evidence for farmers, land managers and advisers of which management actions will improve a site for nature.

4.4 The Warwickshire LNRS could:

- Support local or Government targeting of funding applications, opportunities and advice.
- Be used by some funding bodies to target grant awards.

4.5 The LNRS will not:

- Require land owners or managers of land to make specific proposed land use changes
- Place new restrictions on developing land
- Identify areas to be given legal nature protections that create restrictions on how land can be used
- Provide detailed site specific advice. The recommendations within the LNRS are still subject to detailed checks at a site level.

How the LNRS works

4.6 The LNRS is a tool that can inform positive land management to support nature recovery.

4.7 The LNRS will be a useful guide to help nature recovery in the Borough, and will be used by the Council in several ways, including:

- Supporting Biodiversity Net Gain (BNG) – identifying potential sites on Council land to deliver biodiversity units through habitat creation and enhancement.
- Supporting local nature projects – providing clear priorities than communities and partners can use to deliver nature recovery

- Using it as evidence – informing policy development and environmental reports with local data and priorities.

How the LNRS will be delivered

4.8 The LNRS will help people to see where action to recover nature in the area would be most effective. There is no requirement that any specific proposed action must be carried out. Instead, the proposals are intended to guide where the public, private and voluntary sectors focus their nature recovery efforts for greater collective impact.

Reviews and Updates

4.9 WCC, as Responsible Body, will be required to review progress against the LNRS periodically and to update the strategy to reflect what has been done and where more action is needed. Part 3 of the LNRS addresses how the LNRS will be monitored and recorded.

4.10 The SoS will announce when all strategies across England must be reviewed. Responsible authorities will then publish updated strategies. This process must happen every 3 to 10 years.

Policy Context

4.11 The updated National Planning Policy Framework (NPPF) published in August 2026, gives greater prominence to Local Nature Recovery Strategies within both plan-making and decision making. The NPPF requires planning policies relating to biodiversity, habitat enhancement and nature recovery to take account of LNRS priorities and opportunities, helping ensure that development contributes to wider environmental objectives and the delivery of nature recovery at a strategic scale.

4.12 In a local context, Policy NE3 (Ecology, Biodiversity, Geodiversity and Local Nature Recovery) of the Borough Plan Review was prepared in consultation with Warwickshire County Council. The Policy requires development proposals

to have regard to the Warwickshire LNRS and its priority habitats and species and any Areas of Particular Importance for biodiversity or opportunity areas.

Status of LNRS

4.13 The LNRS was adopted by Warwickshire County Council on 16 April 2026 and subsequently submitted to central government.

4.14 The LNRS has now been formally acknowledged by the Secretary of State and as such Local Authorities must now 'have regard' to the document in respect of planning decisions and can inform wider decision making across the Council.

4.15 To aide developers, stakeholders and interested parties a Local Nature Recovery Strategy User Guide (Appendix B) has been prepared.

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

5.1 Consultation on the emerging LNRS was undertaken by Warwickshire County Council in Summer 2024. A statutory consultation took place in 2025. Nuneaton and Bedworth Borough Council, as Supporting Authority, were consulted throughout.

6. Financial Implications

6.1 The endorsement of the LNRS would have no direct financial implications. Whilst the recommendations of the LNRS may influence future decisions made by the Council in respect of nature activities or projects, the LNRS does not in itself require or commit the Council to any additional spending.

6.2 The management of land, or nature improvement actions or projects carried out on land for which the Council is

responsible, has the potential to be informed by the LNRS, however, this would rely on existing budgets, or where available, on obtaining external funding.

7. Legal Implications

7.1. Section 40 of the Natural Environment and Rural Communities Act (as amended by the Environment Act 2021) places a duty on all public authorities who operate in England to consider how they can conserve and enhance biodiversity. In complying with this duty all public authorities must "have regard" to any relevant LNRS. This includes the process of plan-making and decision taking.

8. Equalities implications

8.1. None.

9. Health implications

9.1. The LNRS is a strategy to recover nature which is essential to maintain a healthy environment (e.g. air, soil and water quality) and to provide food (e.g. pollination). The LNRS will also facilitate improved access to nature across the County which has well-being benefits for residents and visitors of the Borough. The LNRS will also have impacts upon carbon reduction and will assist in mitigating climate change.

10. Environmental implications

10.1. The LNRS will have impacts upon carbon reduction and will assist in mitigating climate change. Where action is taken against the LNRS, this will contribute to the expansion of a nature recovery network, a commitment from Government's 25 Year Environment Plan.

11. Section 17 Crime and Disorder Implications

11.1. None.

12. Risk management implications

12.1. No risks to the Council have been identified associated with the endorsement of the LNRS. The LNRS has been produced by Warwickshire County Council, and a Cabinet decision has been made by Warwickshire County Council to adopt the strategy. The endorsement of the strategy sought as part of this report would confirm the Council's support for the strategy; its status and scope would remain unaffected.

13. Human resources implications

13.1. None.

14. Biodiversity Implications

14.1 The LNRS provides a strategic framework for the recovery and enhancement of biodiversity across the county. The endorsement of the strategy does not introduce new statutory obligations on the Council but informs decision making, plan making, partnership working and future investment in nature recovery.

15. Local Government Reorganisation (LGR) Implications

15.1 There are no direct LGR implications given the LNRS covers the whole of Warwickshire.

16. Options considered and reason for their rejection

16.1. In formulating this report and its recommendations, the following option was identified. The reasons for its rejection are outlined below.

Option Ref	Option Title	Reason for rejection
A	To not proceed with the endorsement of the Warwickshire	Rejected – To endorse the LNRS would help to demonstrate the Council's wider compliance with the relevant provisions of

	Local Nature Recovery Strategy.	the Environment Act 2021. It would also provide an underlying strategy that can inform the development of the Local Plan and would assist in steering the direction and outcomes of development proposals when planning permission is being sought.

17. Conclusion

17.1. That Cabinet approve the three recommendations set out in section 2 of this report.

18. Appendices

18.1. Please note the following appendices:

(i) Appendix A – Warwickshire Local Nature Recovery Strategy [weblink to Warwickshire LNRS]
(ii) Appendix B – Local Nature Recovery Strategy Guide

19. Background papers

19.1. There are no background papers.

20. Report Writer Details:

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Appendix A

Warwickshire Coventry & Solihull
Local Nature Partnership

WARWICKSHIRE
LOCAL NATURE RECOVERY STRATEGY

Warwickshire County Council

Contents

Part one	**3**
Foreword LNP Chair	4
Foreword County Councillor	5
Introduction	6
What will the Warwickshire LNRS do and not do?	8
Governance and Structure	9
Why are the LNRSs required?	9
Strategy Area Description	10
Geology	12
Landscape	13
Habitats	15
Species	16
Water	17
Farming	19
Wider Ecological Connections beyond Warwickshire	20
Heritage & Culture	21
Population	23
Part two – Overarching Themes	**24**
Climate Change Adaptation, Mitigation and Resilience	30
Alignment of the Warwickshire Local Nature Recovery Strategy Overarching Principles with the Environmental Improvement Plan (EIP) goals	31
Habitat Priorities and Actions	33
Species Priorities List	43
Species Priorities	44
Priority Assemblages	56
Possible Reintroduction/Translocation Species	76
Part three – Delivering the LNRS	**77**
Targeted Approach	79
Delivery Mechanisms Overview	80
Monitoring	82
Part Four – Glossary & Acronyms	**83**
Appendix A – Governance and Structure LNP Chair	**90**

Published May 2026

Part one



Foreword LNP Chair



David Lowe: Chair of the Warwickshire Coventry and Solihull Local Nature Partnership (WCS LNP)

The recovery of nature is not a new concept in Warwickshire; nor is partnership working. However, the Warwickshire Local Nature Recovery Strategy (LNRS) heralds a promising new era; a strategic approach to draw together all the threads of activity happening throughout the county and weave a living tapestry as important as that of the Sheldon Tapestry that hangs in the Warwick Museum.

The Warwickshire LNRS has been prepared by the constituent members of the WCS LNP after extensive local group and public engagement to find out what makes Warwickshire's wildlife so important. From these discussions, plus the Local Biodiversity Action Plans fostered by the partnership, we have fashioned a strategy that looks to meet all our hopes and dreams for Warwickshire's past, current and future biodiversity.

Now that we know what we must do, it is time for all communities and sectors of society to adopt the aims and objectives within the Warwickshire LNRS's and reconstruct a Warwickshire where natural capital is core to all our understandings. After all, natural capital is what brings us life; the oxygen we need to breathe; the water we need to drink; the stress-release to get us through the day. However, it will not come easy and will need dedication, resources and financing.

The Warwickshire LNRS has been written by the people of Warwickshire for the biodiversity of Warwickshire. It is a strategy that pledges our support to protect, conserve and enhance Warwickshire's wildlife and its habitats. It holds actions, objectives and priorities that we must meet should we wish to continue to hear the dawn chorus across our towns and countryside; have clean water to drive industry and grow our food; have pollinators to maximize yields.

As Chair of the WCS LNP, I am honoured to have overseen the production of the Warwickshire LNRS and I, speaking on behalf of the LNP members, pledge to do all we can to help you make all within the strategy a reality.



Foreword County Councillor



Cllr Darren Cheshire, Warwickshire County Council's Portfolio Holder for Environment, Heritage and Culture.

In Warwickshire, we are justly proud of our cultural heritage background: From the coal mining in the north, manufacturing in the heartlands and agriculture throughout. The past has shaped our landscape and the biodiversity that lives within our rural and urban communities.

However, it is time we ask ourselves some basic questions:

Why do we pollute the water in our rivers and aquifers that we rely on for drinking, brewing and irrigating our food? Why don't we work with nature to allow our water to flood our flood plains and not our homes, businesses and transport networks. Why don't we store this life-giving resource in times of excess ready for the lean months?

Why don't we promote nature friendly farming and embrace innovation to reduce our reliance on chemicals yet increase productivity.

What do we, as the current landscape stewards and architects, want the future to look like?

The Warwickshire Local Nature Recovery Strategy has been shaped by Warwickshire residents, industrialists and landowners to create places where we would be proud to live and work.

This vision for the future, includes towns and villages with more trees, wildlife rich public open spaces, green roofs and road verges. Places that link to rural landscapes of functional hedgerows that connect to more resilient, wildlife rich woodlands, ponds and grasslands.

How do we create this future?

We need to all work together in our gardens, parks and fields. We need to work with businesses to invest in our natural capital to increase its (and our) wealth.

Warwickshire is leading the way in this new approach towards environmental net gain. This delivery of the Warwickshire Local Nature Recovery Strategy will be our legacy of responsible stewardship of the natural world that we will leave for future generations.

Introduction

What is a Local Nature Recovery Strategy?

Welcome to the Warwickshire Local Nature Recovery Strategy. Local Nature Recovery Strategies (LNRS) are locally led plans mandated by the Environment Act 2021. They aim to recover nature and improve the environment by focusing on actions with the greatest impact on nature recovery. The Warwickshire LNRS in collaboration with the other 48 LNRS will cover the whole of England, to become a Nature Recovery Network across the country. More information on LNRSs can be found on the UK Government's LNRS webpages[1] and in Appendix A.

The Warwickshire LNRS

The Warwickshire LNRS is split into 4 parts:

Part 1: Introduction to the LNRS

Part 2: LNRS Themes and Priorities (including species priorities)

Part 3: LNRS Delivery and Monitoring

Part 4: LNRS Glossary

The LNRS habitat map for Warwickshire is embedded into Part 2 and can be viewed online via the Warwickshire Local Nature Partnership website (**https://www.wcslnp.co.uk/lnrs**). The map includes:

- **Areas of Particular Importance for Biodiversity (APIB):** Existing sites of high value for nature, including nationally designated sites (e.g., SSSIs, SACs, LNRs), irreplaceable habitats such as ancient woodland and veteran trees, and Local Wildlife Sites. These areas are protected and play a vital role in conserving biodiversity. The nationally designated sites in Warwickshire currently include Sites of Special Scientific Interest (SSSIs), one Special Area of Conservation (SAC), and several Local Nature Reserves (LNRs). The only irreplaceable habitats present in Warwickshire are ancient woodland and ancient and veteran trees.

[1] *https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies*

- **Areas that Could Become Important for Biodiversity (ACB):** ACBs are places where action should be focused to bring the greatest benefits for nature and the wider environment. They represent the best opportunities to create, expand and connect habitats to support wildlife and improve natural systems – helping wildlife thrive and strengthening natural systems. This layer is created by combining the Potential Actions for Nature Recovery layer with the Areas of Particular Importance for Biodiversity (APIB) layer removed. The result is a single map showing a vision for expanding Warwickshire's nature network, focusing on areas where action should be prioritised during the lifetime of this Local Nature Recovery Strategy.



What will the Warwickshire LNRS do and not do?

The Warwickshire LNRS will:

- Identify locations and activities that will have the biggest impact to improve nature recovery over this first iteration of the LNRS (envisaged to be 8 years).
- Be used by local authorities when developing planning strategies and to inform decision making.
- Be used to incentivise locations for habitat creation within Biodiversity Net Gain implementation.
- Continue to support nature recovery actions in Nature Improvement Areas.
- Provide evidence for farmers, land managers and advisers of which management actions will improve a site for nature.
- Be used by local groups and individuals for community or home-based nature recovery projects, and as an educational resource.

The Warwickshire LNRS should:

- Support local or government targeting of funding applications, opportunities and advice.
- Be used by funding bodies to target grant awards.

The Warwickshire LNRS will not:

- Require owners or managers of land to make specific proposed land use changes.
- Place new restrictions on developing land.
- Identify areas to be given legal nature protections that create restrictions on how land can be used.
- Prevent nature conservation work in areas not prioritised by the LNRS.
- Provide detailed site specific advice. The recommendations within the LNRS are still subject to detailed checks at a site level

Governance and Structure

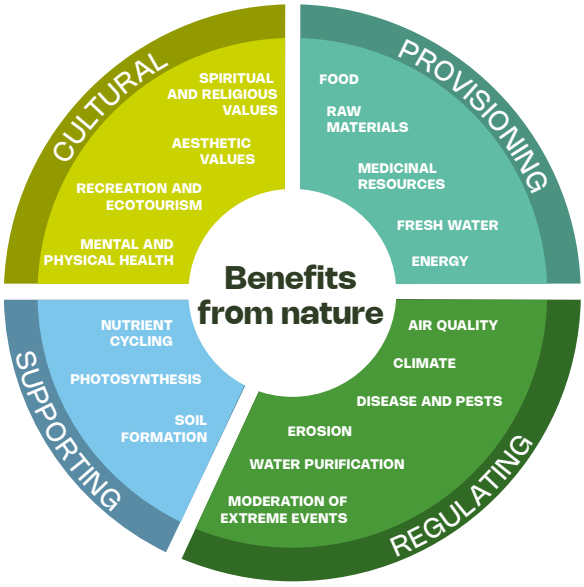
Warwickshire County Council is the principal owner of the Warwickshire LNRS having been appointed by the Secretary of State to oversee its preparation. However, the Warwickshire, Coventry & Solihull Local Nature Partnership (WCS LNP) is the lead delivery organisation to promote and enact the strategy. More information on the WCS LNP can be found in Appendix A and on the **LNP website**[2] along with other user-friendly resources.

The LNRS will have no impact without the active participation of many landowners and managers, the LNP will strive to encourage and support them to keep doing what they are already doing for wildlife and to do more.

Why are the LNRSs required?

Nature and wildlife are declining at an alarming rate across the UK. The State of Nature (2023) report indicates that one in six species are at risk of extinction in Britain. Since 1970, wildlife has declined by 19% on average, and many important habitats are in poor condition. Yet, nature provides essential ecosystem services- such as clean air and water, pollination, climate regulation, and flood control – that are fundamental to our survival. Without these services, societies would struggle to grow food, maintain health, or adapt to climate change. Protecting and restoring nature is not just an environmental priority, but a human one. Together, all the LNRSs around the country will create a national approach to recovering nature.

Figure 1: *benefits and co-benefits that nature provides as divided into the four ecosystem services divisions.*



[2] https://www.lnpwcs.uk/

Strategy Area Description

The Warwickshire Local Nature Recovery Strategy (LNRS), as shown in Figure 2, covers the administrative county of Warwickshire and includes the five districts and boroughs of North Warwickshire, Nuneaton and Bedworth, Rugby, Stratford-on-Avon, and Warwick. Solihull and Coventry are not part of the Warwickshire LNRS, as they fall within the West Midlands Combined Authority (WMCA) LNRS.

Warwickshire holds a unique place in history as the first county to have its antiquities documented in detail by Sir William Dugdale in Antiquities of Warwickshire (1656). Later, The Victoria History of the County of Warwick (1904) by Herbert Arthur Doubleday described its geology, natural history, and human heritage, listing species recorded at the time. His description remains true today albeit exacerbated by the increased fragmentation of the landscape from development, road and rail infrastructure plus the changing climate:

"In treating of the flora of a county, it is well to refer not only to that which is now prevalent; but also, so far as knowledge serves, to that which has prevailed in the past, but whose existence has become impossible owing to altered surroundings. In few of our midland counties have the changes incidental to the growth of population been more marked than in Warwickshire. A glance at a map of the county, and a study of the names of localities, will show that formerly heaths, wastes, commons and marshes existed, indeed were extensive in all parts of the county; and the records of the older botanists show that plants characteristic of such localities, though now in many cases either extinct or very rare, were then of more frequent occurrence; but heaths, wastes and commons have been enclosed and reclaimed, marshes and bogs drained, and the only portions of the county which at the present time really represent these past conditions, are some of the wilder portions of Sutton Park ***[now no longer in the County of Warwickshire].*** *The distribution of plants is to a certain extent determined by climate; proximity or otherwise to maritime influences, altitude, and by the general character of its rocks, whether igneous, calcareous or sandstone. The insular position of Warwickshire, and*

Figure 2: *Warwickshire's five districts (Source: Warwickshire County Council. State of Warwickshire.*



the absence of any great irregularities in its surface produce a mildness of climate; while it is free from the disturbing influences of either sea or mountain. Although everywhere undulating beautifully, the greatest altitude is only 855 feet above sea-level, and the average altitude about 380 feet above the sea, or well within the lowest zone of climatic influence. Its rocks are varied, beginning with the Cambrian and ending with the Inferior Oolite, but these are often in a degree obscured by the sands, gravels and clays of the drift, and these deposits materially affect the character of the flora. Throughout its area Warwickshire is well covered with trees, many of the woods being extensive, probably remains of the Great Forest of Arden, and are often rich in characteristic plants, as in the well-wooded district around Atherstone and Hartshill." (Victoria History of the County of Warwick, Herbert Arthur Doubleday, 1904).

The publication continues by noting flora distinctive of each area, which was repeated in the Computer-Mapped Flora in 1971 and Warwickshire's Wildflowers (S Falk, 2009) afterwards.

Today, this proud tradition of documenting Warwickshire's natural heritage continues through the Warwickshire Biological Records Centre and the tireless efforts of local recorders in the community. Their meticulous observations and data collection provide an invaluable evidence base for understanding species distribution, monitoring trends, and informing conservation priorities. These records underpin the Local Nature Recovery Strategy by ensuring decisions are grounded in the best available knowledge. The commitment of Warwickshire's recorders, past and present, remains central to safeguarding biodiversity, enabling us to track changes and trends over time and respond effectively to the challenges of habitat loss, fragmentation, and climate change.

Geology

The vegetation, species and crops grown in Warwickshire are influenced by the type of soils and these are determined by the underlying geology. Figure 3 Rock Types in Warwickshire illustrates the occurrences of different rock units as they occur at the surface.[3] On this map, the yellow patches are the younger Jurassic sandstones, ironstones and limestones; the red corresponds to early Jurassic clays and limestones; the pink is Triassic clay and sandstone; the green is the Carboniferous rock of the Warwickshire Coalfield, and the blue is the ancient Precambrian and Cambrian rocks of north Warwickshire'. Source: Jon Radley (28/01/2016).

The harder ironstones and limestones form high ground. In brief, the soils in Warwickshire range from light to medium silty loams, with sandy soils in the north and centre, and heavier loams in the south.[4] The corresponding pH levels of these soils are primarily neutral, with pockets of acidity and more calcareous alkaline areas along the river Avon and limestone ridges in the south.

Figure 3: *Rock types in Warwickshire.*





[3] *Heritage and Culture Warwickshire. The Geology of Warwickshire – Our Warwickshire. [Online]. 2016. [Accessed 03.12.2024]. URL: < The Geology of Warwickshire – Our Warwickshire >*

[4] *[Countryside survey topsoil_pH_bulkdensity]*

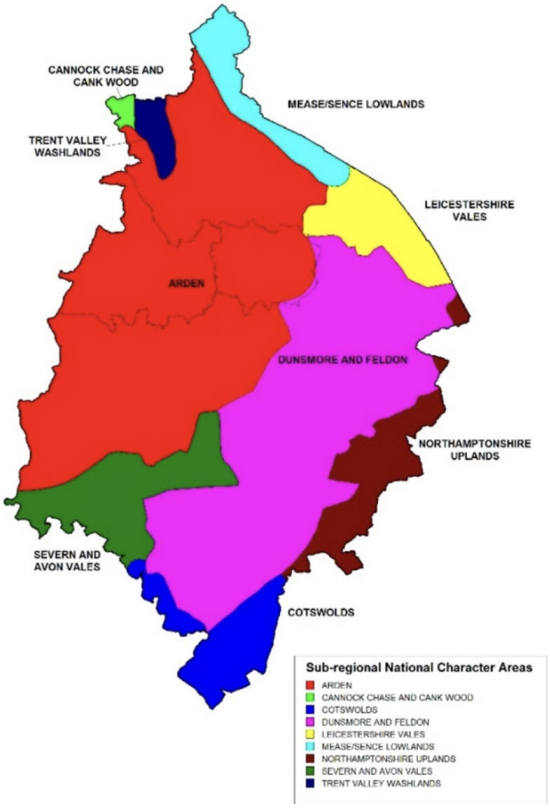
Landscape

The County is sub-divided into nine National Character Areas (NCAs),[5] based on landscape, geology, biodiversity, history, culture and economics.

- **The Cotswolds** (NCA 107) are dominated by steep scarps crowned by open wold with wooded valleys.
- **The Dunsmore and Feldon** (NCA 96) is a predominantly open rural, agricultural landscape, crossed by numerous small rivers.
- **The Northamptonshire Uplands** (NCA 95) is a landscape of gently rolling hills and valleys with open field systems, and distinctive nucleated villages with scattered broadleaved woodlands.
- **The Severn and Avon Vales** (NCA 106) consists of a low-lying open agricultural vale landscape made up of distinct and contrasting vales.
- **The Arden** (NCA 97) comprises farmland and former wood-pasture where mature oaks are set in hedgerows. Distinctive field boundaries, historic parklands and narrow river corridors are key features that are all on the doorstep of a heavily urbanised area.
- **The Leicester Vales** (NCA 94) are an open landscape of gentle clay ridges and valleys which gives way to the Mease/Sence Lowlands (NCA 72) a gently rolling agricultural landscape centred around the rivers Mease, Sence and Anker.
- **The Trent Valley Washlands** (NCA 69) comprise the river flood plain corridors of the middle reaches of the River Trent's catchment in the heart of England. It is a distinctly narrow, linear and low-lying landscape, often clearly delineated at its edges by higher ground, and it is largely comprised of the flat flood plains and gravel terraces of the rivers.
- **The Cannock Chase and Cank Wood** (NCA 67) forms a plateau, rising above its surroundings.

The Warwickshire Landscape Character[6] study adds further detail to the NCAs with the seven areas: Arden, Avon Valley, Feldon, Cotswolds, Mease Lowlands, High Cross Plateau and Dunsmore. These are further divided into areas for which there are specific recommendations to retain and enhance their individual features of importance, of which many are brought forward in this strategy.

Figure 4: *National Character Areas for Warwickshire*



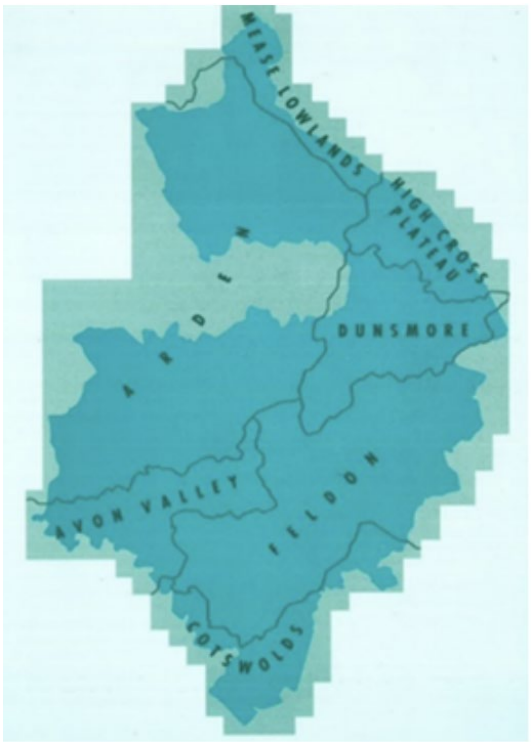
[5] *Natural England. National Character Area Profiles: [Online]. 2024. [Accessed 23.11.2024]. URL: <* *Natural England – National Character Area Profiles – National Character Area Profiles >*

[6] *Warwickshire County Council. Landscape architecture service – landscape character and guidelines. Online. 2024. [Accessed 23.11.2024]. URL: Landscape architecture service – landscape character and guidelines – Warwickshire County Council*

The Warwickshire Landscape Character areas have made a significant contribution in the designation of the Nature Improvement Areas and project areas brought forward and approved by the Local Nature Partnership of which there are four that include Warwickshire and cross into the West Midlands, Staffordshire and Worcestershire LNRSs.

- **Tame Valley Wetlands NIA –** The Tame Valley Wetlands landscape covers the Tame Valley between Birmingham and Tamworth, in North Warwickshire and south-east Staffordshire, following 29 km of the middle River Tame, and lower sections of tributaries including the River Anker, Bourne, Cole and Blythe SSSI. The Tame Valley Wetlands has a wide variety of habitats that host a rich diversity of wildlife (website coming soon) and rare species. Home to several of the most important wildlife sites (website error) in the Midlands, this regionally important river corridor is also a vital north-south migration route, providing essential resting and feeding places for hundreds of migrating birds.
- **Dunsmore Living Landscape NIA –** At the heart of the Dunsmore area lie **20** woodlands covering **618** hectares. They represent more than **10%** of the whole of Warwickshire's ancient woodland. These woodlands are a treasure trove of biodiversity, home to many species of insect, butterfly, plants and birds. This area also tells a fascinating story of prehistoric Heidelberg man and the rise and fall of empires. From the discovery of a half a million year old hand axe in a quarry near Bubbenhall, to Roman barracks at Baginton, Saxon settlements at Wappenbury and Norman fortifications at Brinklow, a visitor to the area is able to discover much of the nation's history. Grand landscape designs at Coombe Abbey and Stoneleigh Abbey have also left their mark, not least in the nationally important collections of veteran and ancient trees.
- **South-West Warwickshire NIA (in draft) –** an ancient landscape area of wooded river valleys and pastures that makes a significant contribution to sustaining landscape permeability for species movement through the country; linking the south of Warwickshire to the northern Tame Valley Wetlands through Solihull and Coventry's strategically significant 'Meriden Gap' that separates the urban settlements of Birmingham and Coventry.
- **Sherbourne Valley –** covering an urban living landscape area where people, nature and culture can thrive. The Sherbourne and its minor tributaries flow from Corley Moor, right under and through the heart of Coventry city centre and out to Whitley Abbey, this 9 mile waterway is rich in built, natural and cultural heritage; from scheduled monuments to precious natural habitats and unique histories.

Figure 5: *Warwickshire Landscape character map*



Habitats

Warwickshire's habitats and Local Wildlife Sites (LWSs) have been systematically mapped and updated annually since 1997 by the Natural Capital Assessment Partnership.[7]

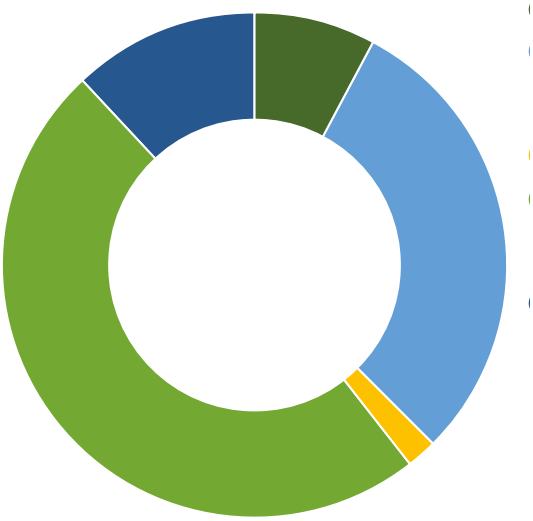
Warwickshire has **92** sites with national statutory protection of which 28 are Local Nature Reserves (LNRs), **63** are Sites of Special Scientific Interest (SSSIs) and 1 Special Area of Conservation (SAC). These sites account for **1%** of Warwickshire's 197,756 hectares.[8] When including the **489** Local Wildlife Sites, which are of county-level importance, the total area coverage rises to **3%**. An additional, **1,210** potential LWSs await surveying. Of the **489** Local Wildlife Sites, **237** were assessed as being in good or favourable management condition at the time of survey; the remaining sites, either lack data or require improved management.

Heathland and wetlands are the rarest broad habitat types across Warwickshire. Heathland covers less than 0.01% of the local authority area (10 hectares), with **35%** found in North Warwickshire Borough Council and **55%** found in Stratford District Council. The wetland habitats of 'mire' and 'swamp, marginal and inundation' habitats collectively represent **0.1%.**

The most widespread habitat type is 'cultivated and disturbed land', comprising 49% of Warwickshire. This category includes 'amenity grassland', 'arable land', and 'introduced shrub'. In contrast, the 'Woodland and Scrub' category – which encompasses 'parkland', 'woodland', 'recently felled woodland', and 'wet woodland' – covers **7%** of the county[9], compared to a national average of **13%.**[10]

Urban features such as roads and buildings cover approximately **7%** of Warwickshire. When considering 'improved grassland', set-aside, and arable land as the primary agricultural land uses across the sub-region, these collectively account for an estimated **69%** of the county. Additionally, around **10%** of Warwickshire's grasslands are classified as semi-natural, supporting distinctive plant communities associated with calcareous, neutral, acid, or marshy grassland types.

Figure 6: *Proportion of Broad Habitats across Warwickshire (NCAP, 2019)*



- Woodland and scrub (**8%**)
- Grassland and marsh – including improved and semi-natural grasslands (**30%**)
- Other (**2%**)*
- Cultivated and disturbed land – including arable land and amenity grassland (**49%**)
- Unsurveyed or urban features* (**12%**)

* Urban features, e.g. buildings/roads and other 'artificial' surfaces are not included in the Phase 1 survey process and so are included in un-surveyed areas. 'Other' includes 'heathland', 'mire' and 'swamp', marginal and inundation' wetlands, 'tall herbs', 'open water' and 'rock exposure and waste'.

[7] Natural Capital Assessment Partnership (previously the Habitats Biodiversity Audit), 1997 – 2025. Natural Capital Assessment Partnership (NCAP) | Warwickshire Wildlife Trust

[8] Ordnance Survey. OS Boundary-Line: Warwickshire District and Borough Boundaries [Data set – Open Govt license]. Ordnance Survey, 2024.

[9] These figures are derived from historic environment and local habitat datasets and not taken from the National Forestry Inventory

[10] Forest Research. Woodland Area & Planting. In: Forest Research. Forestry Statistics 2023. Midlothian: Forest Research, 2023.

Species

Warwickshire's central location in the midlands sees the movement of species both northward and southward, resulting in a significant overlap of both northern and southern notable species distributions. The colonisation of species is continuing with those that utilising the River Avon and Tame and their tributaries and wetlands. These species include the migratory fish listed within the Special Areas of Conservation and RAMSAR designations associated with the Humber and Severn estuaries. The Worcestershire and Gloucestershire colonisers also include Beckstein and lesser horseshoe bats and other mammals such as otter. From the north, Warwickshire has seen the arrive of invertebrates such as the Black Darter dragonfly and potentially beavers.

Monitoring colonisers verses visitors can be problematic and, therefore, it is often easier to document local extinctions than to confirm the establishment of new arrivals. Figure 7 illustrates the timeline of local extinction for 78 plant species recorded as lost from Warwickshire.

A similar trend is observed among larger moth species. Nineteen species are considered extinct, with an additional 24 likely lost before 1950. Over the past 30 years, a further 41 species have experienced significant declines. However, since 1980, there has been a positive shift, with 33 species showing population increases and 29 new species establishing residency in the county. (David Brown, Larger Moths of Warwickshire, 2006).

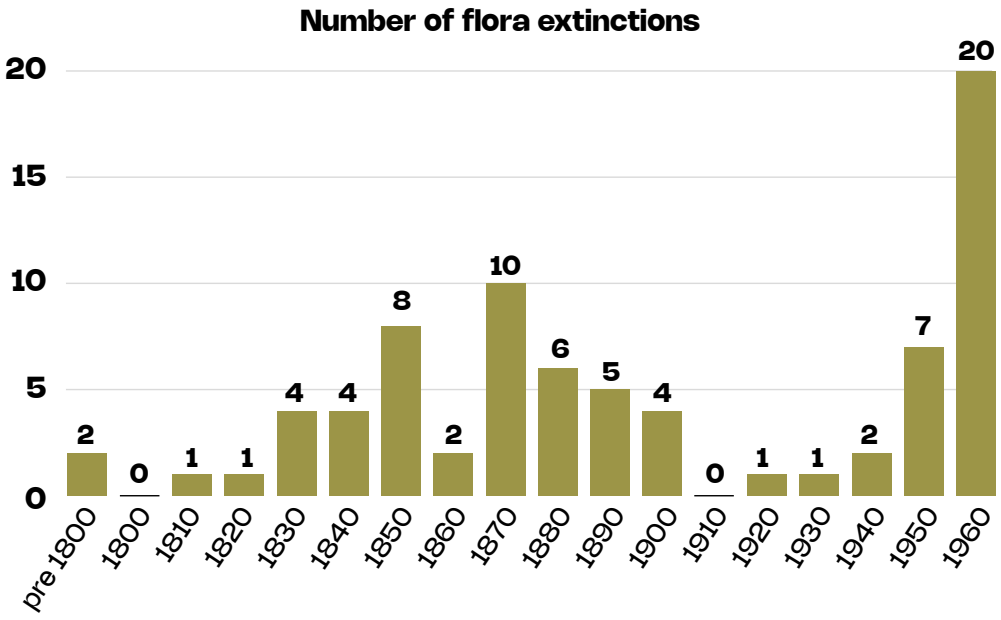


Figure 7: *Last recorded decade for 78 Warwickshire extinct native plants, 1670–1960 (S Falk, 2009)*

Water

Warwickshire contains 72 river water bodies, either fully or partially within its boundaries. According to the Water Framework Directive (2022), only one of these is classified as having 'good' ecological status. Of the remainder, 42 are rated as 'moderate', 22 as 'poor', and 2 as 'bad'.

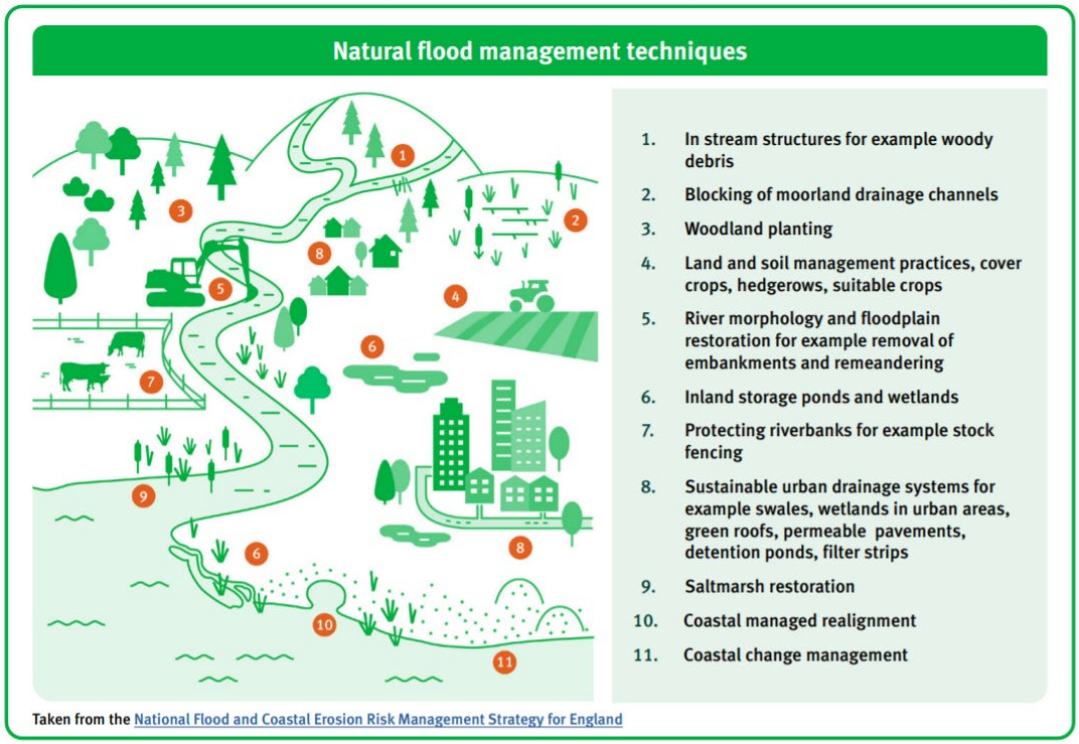


Phosphates account for approximately 70% of the reasons for not achieving 'Good' with 71 out of 72 river water bodies failing for this reason, and 54 out of 72 failing for nutrient pollution. The top two significant water management issues are diffuse source and point source pollution, with the top diffuse source reasons being attributed to poor livestock management, urbanisation and poor nutrient management respectively, and the top point source reasons being attributed to sewage discharge (continuous and intermittent sources respectively).

Warwickshire's water environment is essential to nature's recovery. While water is available for new abstractions within the county's catchments, it is subject to regulatory restrictions.11 Any new consumptive abstraction is likely to be restricted by abstraction conditions requiring abstractors to stop when flows fall below a pre-set threshold. This is required to protect river ecology at lower flows and is set at an appropriate flow according to the resource balance in the Trent/Severn catchment downstream and at the local assessment point. Restrictions vary between watercourses, with some being more sensitive than others—particularly during dry conditions, when enforcement is more likely. Some watercourses have been closed completely to new abstraction; for the Tame Anker & Mease these include the River Anker (upstream of the confluence with the Sence), Bourne Brook, Darnford Brook and the Darklands Brook and for the Warwickshire Avon they include the River Leam plus some smaller tributaries such as the River Sherbourne, Finham Brook, Canley Brook, Blockley Brook, Batchley Brook and Upper Bow Brook.

[11] *Tame Anker & Mease ALS and the Warwickshire Avon ALS.*

Figure 8: *Natural flood management techniques essential for water resilience*



Warwickshire's aquifers are also under pressure. Overall, in the Tame Anker and Mease catchments there is limited water availability for further licensing from the principal aquifers. Whereas in the Warwickshire Avon there is a very limited water availability for further licensing. This demand on water coupled with the impacts of climate change means that water security, quality and aquifer recharge will continue to be significant concerns if the county's water supply is to meet the needs for humans, livestock and crops as well as nature.

Warwickshire has also seen excessive rainfall causing localised flooding that damages homes, crops as well as road and rail infrastructure. Causal factors being the historical deepening and straightening of watercourses and heavily modifying waterbodies that has reduced the natural processes of erosion and deposition affecting the way the watercourse interacts with its floodplain. There is, therefore, a need to make land available for natural flood management and making the most of nature-based solutions to help with the natural regulation of hydrological systems.

Warwickshire has a significant canal infrastructure which connects with the Warwickshire Avon at Stratford-on-Avon enabling some connectivity across natural water catchments areas as well as providing nature rich habitat. They, along with watercourses, are essential in connecting people with nature through recreation and tourism opportunities.

Farming

Warwickshire is traditionally a farming county, with rich fertile soils which support arable and pasture farming. However, horticultural industries are flourishing in the vales, together with tree nurseries supplying stock to meet tree planting commitments.



Warwickshire is the home to the National Farmers Union and the acclaimed Warwickshire Rural HUB that encourages farmers to adopt sustainable farming practices that enhance biodiversity, including pollinators, and minimise environmental impacts.

Agriculture plays an important role in the attractive rural location that underpins our wider economic base. With approximately 2000 farm holdings, managing 160,000 hectares of land, the local farms support 6,000 people, generating £138 million towards the Warwickshire economy. Warwickshire agricultural businesses are well placed to take advantage of the advancements of Agri-tech given their proximity to the University of Warwick's Wellesbourne Campus, a centre for innovation in Agri-tech.

The rural economy in Warwickshire consists of a wide variety of businesses from artisanal food and drink producers to hospitality businesses and farmers, contributing to a thriving community of businesses. Overall, 38.33% of employment and 37.8% of places of work are within a rural setting which means over 1 in 3 workplaces is based rurally in the county, and these make up 38% of the county's total Gross Value Added (approx. £7.4bn of £19.6bn total (Office of National Statistics/Inter-Departmental Business Register).

It is essential that nature's recovery is considered collectively within farm diversification, the growing variety of farming systems and those landowners that wish to maintain their current identity and prestige. Nature and environmental farming practices need to support landowner's income.

Wider Ecological Connections beyond Warwickshire

In order to secure the recovery of nature in the face of climate change we need to plan and act to help nature move through the landscape as it adapts to a warming climate. We need to think about Warwickshire's future wildlife. What species will need to be living here in 10, 50 and 100 years' time and how will they get here? More mobile species are already moving at a scale greater than an individual county and Warwickshire has an important role to play in supporting movement at this scale.



Calcareous (limestone and chalk) landscapes in the south of England contain the most species-rich habitats within the UK. When combined across the whole landscape, these habitats make the calcareous landscapes one of the best places to allow wildlife to recover and adapt to climate change. With a north south reach of 171 miles, Big Chalk[12] represents one of the best opportunities offered by the English landscape to support the northward movement of species to a new climate space. Warwickshire plays an important role as both a destination for these species and as part of a route further north. Big Chalk is a pan-England partnership programme designed to facilitate this recovery and movement across the calcareous (chalk and limestone) landscapes of southern England. It seeks to amplify the efforts of partners to create a robust ecological network on a scale hitherto unimagined.

The Arden Forest of small pastures within a woodland landscape stretches out of Warwickshire to the western reaches of West Midland Combined Authorities, southward to Worcestershire and north into Staffordshire. This connected landscape including the 'Meriden Gap' between Coventry and Solihull represents a key cross-boundary ecological corridor and a vital green buffer that is taken into consideration within planning decisions with regard to settlement coalescence between Coventry and Solihull. It is essential to sustaining landscape permeability, supporting species movement, and delivering LNRS spatial priorities and plays an important role in the midlands region's nature recovery.

[12] www.big-chalk.org

Heritage & Culture

Warwickshire's nature is intrinsically linked to its heritage and culture as evidenced through historic sites such as Warwick Castle and its parklands that is one of the best Medieval Castles in the country attracting visitors from all over the world. Warwickshire has a landscape of designed parklands, buried settlements, barrows and ridge and furrow, which can be viewed throughout the county. Other historic sites include Edgehill where the first battle of the English Civil War took place, Shakespeare's Birthplace on Henley Street in Stratford upon Avon and Anne Hathaway's (Shakespeare's wife) Cottage in Shottery, Charlecote Deer Park on the banks of the River Avon, plus Kenilworth Castle and its Elizabethan Garden, where fossils are evident in some parts of the surrounding sandstone walls.

Warwickshire also has historic market towns such as Henley in Arden, Alcester, Stratford upon Avon and Warwick. Royal Leamington Spa has regency buildings, mineral waters, historic buildings and the Jephson Gardens. Furthermore, with Shakespeare in the south, J R R Tolkien visiting the west, and George Eliot in the north of Warwickshire's landscapes, nature has been a source of inspiration to be immortalised in English literature.

The beautiful rural setting also attracts visitors to the country parks and to cycle along a growing number of established routes throughout Warwickshire taking in rustic local villages and towns. There is a growing demand for 'outdoor' experiences. Warwickshire has a world-class reputation for its visitor economy based on the iconic attractions of Shakespeare's Stratford and Warwick Castle in the south. To the east, Rugby School boasts the birthplace of the game that bears its name. In the north of the county, business tourism has traditionally been strong, supported by significant meetings and events industry clustered around Birmingham, Coventry, and the NEC. Other visitor attractions of national significance include The Belfry Golf Course in the North Warwickshire and the British Motor Museum at Gaydon.

Scheduled Monuments are designated through Historic England and are equivalent to the nationally important ecological and geological Sites of Special Scientific Interest. They are conserved for education and culture.[13] There are many historical sites in Warwickshire such as Baddesley Clinton, Stoneleigh Abbey and Coughton Court. Other local Monuments, Statues and Follies in Warwickshire can be found by going to the Heritage and Culture website.[14] All of these and other places are visitor attractions and add to the cultural heritage, vibrancy and economy of the county.

Nature has played it part in creating Warwickshire's communities yet the disconnection with biodiversity has been never greater. Nature's recovery can only be successful if humans and nature can reconnect in a positive way to understand how wildlife and nature has shaped our lives and home.



[13] *Ancient Monuments. Scheduled Ancient Monuments in the Historic County of Warwickshire. [Online]. 2024. [Accessed 09.01.2025]. URL: Scheduled Ancient Monuments in the Historic County of Warwickshire*

[14] *Heritage & Culture Warwickshire. Our Warwickshire. Monuments, Statues and Follies. [Online]. 2024. [Accessed 07.01.2025]. URL: https://www.ourwarwickshire.org.uk/content/subject/monuments-statues-follies*

Population

In 2024, Warwickshire had an estimated human population of 632,207 (Office for National Statistics, 2025)[15] projected to increase to 716,378 by 2040 (Office for National Statistics, 2025).[16] Eighty four percent of the area of Warwickshire is classified as rural, with 31% of the population living in these areas.[17] The highest population density is in Nuneaton and Bedworth Borough with 1,794 people per square kilometre compared to 150 people per square kilometre in Stratford-on-Avon District.

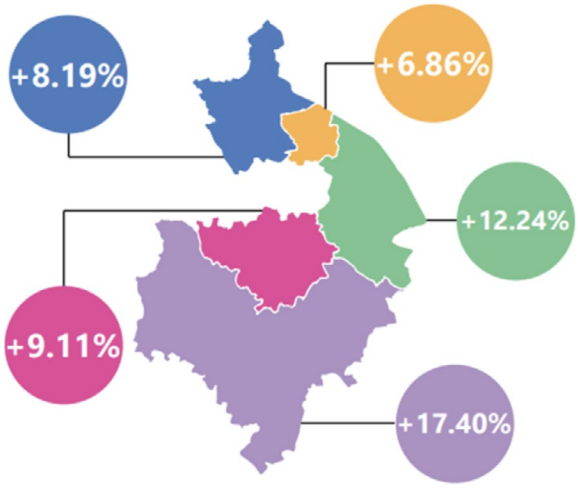
Warwickshire is projected to have a population of nearly 675,000 by 2032, an 11% increase from 2022. This is a greater percentage increase than the 6.4% England average. Over the ten-year period from 2022 to 2032 Stratford-on-Avon District is projected to have the 3rd highest rate of population growth in England at 17.4% increase.[18] The projected population change for Warwickshire is illustrated in Figure 9.

The age composition of the population is also projected to change over the next 20-25 years with both the proportion of working age adults (16-64 yrs) and those on state pension increasing, with the proportion of children (0-15 yrs) decreasing.

It is anticipated that most of the population increase in Warwickshire will be focused within or around existing major settlements although inevitably new settlements will be promoted. This population growth will inevitably increase pressure on greenspaces and natural assets, it is, therefore, essential for nature to be integral to the place-making of all large and small developments. Place-making that retains and conserves natural assets such as trees, ponds, hedgerows and nature rich habitat, whilst integrating them with new wildlife features like sustainable urban drainage, wildlife boxes and hedgehog highways with public spaces for nature to ensure that wildlife connectivity reaches the heart of the community.

The human connection with nature is crucial for the health and wellbeing of Warwickshire's current and future population.

Figure 9: *Projected population change between 2022 and 2032*



[15] *ONS (2025) Estimates of the population for England and Wales - Office for National Statistics*

[16] *ONS (2025), Population projections*

[17] *ONS (2025), 2021 Rural Urban Classification*

[18] *Warwickshire 2022-based Sub-National Population Projections, WCC Business Intelligence 2022 based sub-national population projections Briefing Note*

Part two

Overarching Themes

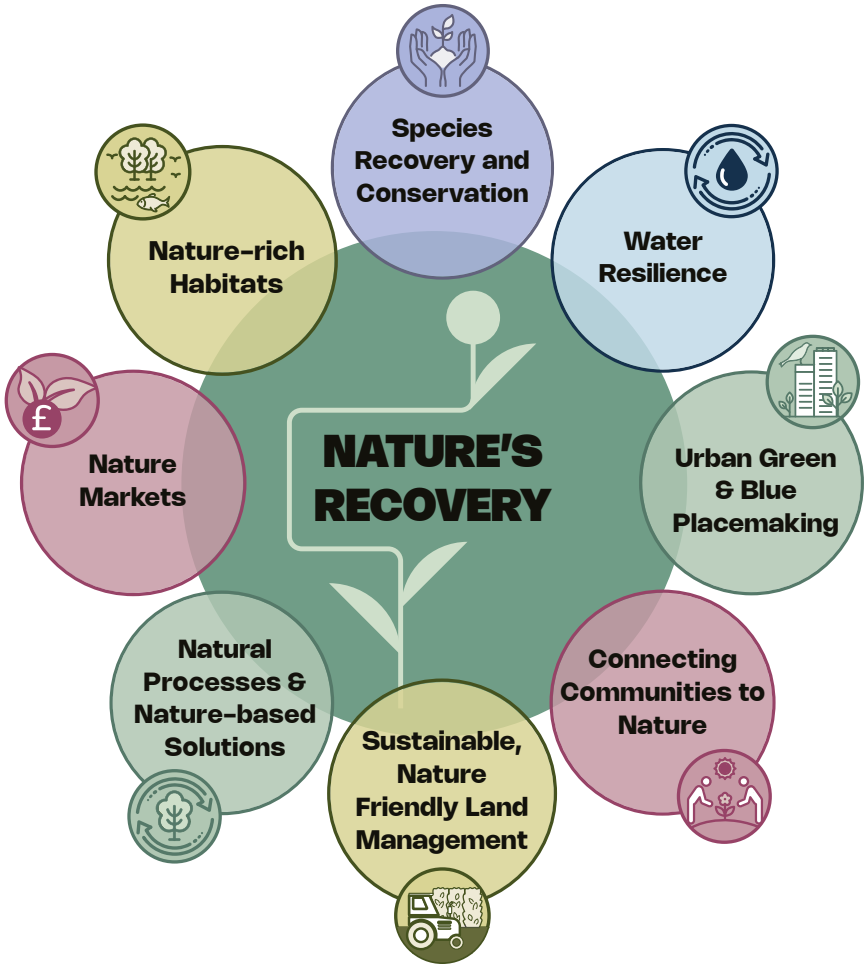


The Warwickshire LNRS is built upon a set of Overarching Themes designed to guide collective efforts where all members of society ("we") can take actions to conserve and enhance the natural environment and deliver the LNP Vision:

"The natural, historic, urban, and farmed environments are in a vibrant condition that enables the economy, nature and people to thrive. A place where everyone is empowered to reverse wildlife losses and create beneficial connections with nature and where nature can flourish in a stable climate."

These themes are the key opportunities for nature improvement in Warwickshire. They serve as the foundation for priorities, actions and initiatives, ensuring a cohesive and effective approach to nature recovery. By adhering to these themes and their priorities, the aim is to address existing problems for nature in Warwickshire and create a resilient and thriving natural landscape that supports biodiversity, mitigates climate change, and enhances the well-being of our communities whilst supporting strong business growth. The Warwickshire LNRS Overarching Themes are:

Figure 1: *Warwickshire LNRS's Overarching Themes*



The Overarching Themes and their Priorities to be taken forward by the actions within the strategy are as followed:

Nature-rich Habitats

Warwickshire can make meaningful and significant contributions to support the international and government 30 by 30 targets1 plus those in the Environmental Improvement Plan (EIP). We already celebrate and value existing nature rich habitat be it on designated sites, temporary incentivised management prescriptions, gardens and farms having comprehensively collated and mapped assets since 1997. From this data, scientific modelling and local knowledge we have identified and mapped opportunities for biodiversity to grow the essential building blocks that will enable nature to thrive in an ecologically connected landscape. For example, our connectivity modelling has and can be used to identify green bridges and underpasses at critical locations to defragment road and rail infrastructure at specific locations. We will also look to safeguard these habitats, through the promotion of biosecurity measures to prevent and control invasive species as well as appropriate, meaningful and proportional policies and strategies. We will also look to create nature rich habitats to enhance and strengthen and extend ecological corridors, both at the local levels, for examples, through hedgerow networks, and at the landscape scale, such as reinforcing and maintaining the environmental integrity of the 'Meriden Gap', which functions as an essential ecological and strategic green buffer separating Coventry from Solihull. Its recognition is essential to sustaining landscape permeability, supporting species movement, and delivering LNRS spatial priorities.

Priorities: Warwickshire will identify, conserve, create, restore, enhance and maintain nature-rich habitats at scale to strengthen ecological resilience and secure long-term connectivity.

Species Recovery and Conservation

Through extensive amateur and professional expert engagement we have identified key and species priorities that need more than well managed nature rich habitat to thrive, i.e. species that require specific actions or requirements. These species could be ones that are holding on in the county, special to Warwickshire or have recently moved in. We will also enable a 'warm welcome' to those species that are at our boundaries and support any reintroductions within neighbouring Local Nature Recovery Strategies or national programmes. Within Warwickshire we will look to support those species reintroduction programs listed in this strategy. We have and will continue to map specific action areas through existing Nature Improvement Area responsibilities and created Species Action Areas where more direct actions will be targeted.

Priorities: Warwickshire will identify bespoke opportunities and actions in combination with the nature-rich habitat actions to support the recovery, establishment or re-establishment of species priorities and those that have the potential for reintroduction.



Water resilience

Warwickshire faces growing flood risk, poor water quality, and biodiversity loss driven by land use pressures, ageing infrastructure, and climate change. While flooding is the immediate concern, future climate-driven drought and water shortages could threaten food security and economic growth. These impacts hinder sustainable development, harm public health, and degrade quality of life and natural habitats. Without a functioning hydrological system on all watercourses as well as maximising rainwater harvesting techniques Warwickshire will continue to experience human, plant and animal health issues that will significantly affect the local and national economy.



Priorities: Warwickshire will deliver a catchment that is resilient to climate and nature-related water risks delivering tangible benefits for Nature, People, and the Economy. It will identify sustainable and holistic land and water management interventions which tackle water security challenges including flooding, water quality and water availability across the catchment.

Urban Green and Blue Placemaking

Nature plays an integral role in shaping and defining where and how we live. The Warwickshire Director of Public Health Annual Report 20242 focused on the built and natural environment and recommended promoting the health and wellbeing benefits of the natural environment to improve community access and use of rural and urban green spaces across Warwickshire. Having biodiversity on our doorstep and accessible nature-rich greenspace within 15 minutes of stepping out of our homes is vital to our health and wellbeing[3]. These spaces also help combat climate change and urban heat island effects. In addition, watercourses and canals also play important roles in shaping our towns and villages, evident as namesakes, e.g. Royal Leamington Spa and Stratford-on-Avon. Often integrated with parks and nature reserves, these blue infrastructure features enhance urban environments, support biodiversity, and bring vitality to community spaces.

Priorities: Warwickshire will promote access for all to nature through existing greenspace to address health inequalities. We will identify areas of nature deficiency and encourage new areas of green spaces in urban and peri-urban areas. We will map green and blue corridors to connect urban green spaces together as well as the wider countryside to encourage wildlife into our urban fabric and conurbations over the border. We will also promote nature-friendly developments and projects that seek nature-based solutions such as the reopening of culverts be they voluntarily or mandatorily through appropriate, meaningful and proportional policies within spatial strategies.

Connecting Communities to Nature

A population that has a close relationship with nature and recognises their shared futures will greatly improve our ability to take meaningful action on the climate and improve the future for wildlife. Nature needs people and organisations that take the challenge of transforming the human relationship with nature seriously. Benefits of being connected with nature include, improved mental wellbeing, more pro-environmental behaviours, greater vitality and happiness, more pro-nature conservation behaviours, more satisfied with life and a greater meaning and purpose in life[4]. The Warwickshire Director of Public Health Annual Report 2024[5] recommended that community-based services and amenities actively tackle social isolation, improve social connectivity and enable individuals and groups to take an active part in society. Another way for communities to connect with nature is social accountability by having an active role in decision making and the future of the nature that surrounds them.

Priorities: Warwickshire will advocate putting social accountability at the heart of decision-making by actively involving existing and future local communities in nature recovery projects. We will promote the environmental education, events and practical activities to raise awareness about the importance of nature recovery and the benefits it gives us to help us reach our targets and we will facilitate and support citizen science initiatives to help us monitor them. We will enable and empower local nature groups and organisations to assist in this role. We will build on the new and existing partnerships with universities, local authorities, environmental Non-Government Organisations, farm clusters, and other relevant stakeholders to foster a collaborative approach to nature's recovery. We will promote active involvement of businesses in practical support through social responsibility and through engaging with local community projects.

Sustainable, Nature Friendly Land Management

Sustainable farming practices that enhance soil health and biodiversity with minimising environmental impacts is critical for Warwickshire's nature recovery. This includes increasing habitat and features for pollinators and wider farmland bird assemblages. As farming is critical to the county's economy all biodiversity priorities must be considered alongside food security, production and profitability. Environmental farm advisors cover the whole of the county who promote and encourage the establishment of farm clusters to enable landowners to share good practice and attract significant green investment.



Priorities: Warwickshire will support farmers and landowners to adopt and advocate good soil health, the importance of biosecurity, pollinators and other good farm and farmyard management practices, such as pollution pathway management, to support biodiversity. We will encourage sustainable riparian management along watercourses. Warwickshire will also promote the research, investment and use of new innovative technological advances that has demonstrable environmental benefits encouraging sustainable intensification alongside increased biodiversity. We will work with the Warwickshire RuralHUB and environment farm advisors plus other existing partnerships and organisations that support sustainable farm practices to enhance farmland for nature recovery.

Natural Processes and nature-based solutions

Enabling Warwickshire's landscape to function naturally, such as through natural colonisation and regeneration, has been demonstrated as the most successful mechanism to deliver nature-rich habitats. While these approaches may take time and often conclude once the desired habitat is achieved, they support long-term ecological resilience. Natural processes like hydrological flow and nutrient cycling can be enhanced through nature-based solutions, such as allowing floodplains to flood or planting woodlands in upper catchments to retain water. These interventions help restore the landscape's natural balance and functionality. Wherever possible, nature-based solutions should be prioritised over hard engineering, offering more sustainable and adaptive outcomes.



Priorities: Warwickshire will advocate naturally functioning landscapes through by restoring natural processes and utilising nature-based solutions to support resilience against both ecological and for projected climate change impacts.

Nature Markets

The previous funding models have failed to recover nature, and the cost of inaction is clear, for example flooding has significant immediate and long-term economic costs and undermines economic growth. A new approach is required to complement the existing grants, incentives and philanthropic mechanisms to deliver nature projects in Warwickshire. Establishing Nature Markets through the blending of public and private finance through green investment is this new approach. Warwickshire has gained extensive knowledge and experience of establishing nature markets through implementing Biodiversity Net Gain since 2012. A regulated Carbon Market is forming, and water markets are being explored within a Nature4Water project.[6] The blending of regulatory markets with voluntary markets and environmental rewarding corporate responsibility partnerships is essential to support nature's recovery.

Priorities: Warwickshire will encourage the 'scaling up' of high integrity green investment to enact the actions detailed in this strategy and other nature recovery projects. We will build upon the Local Authorities Natural Capital Investment Strategy, environmental net gain policies and support the establishment of other partnerships to attract investment and encourage corporate environmental responsibility – benefiting both wildlife and the businesses, particularly farming.

Climate Change Adaptation, Mitigation and Resilience

Organisations across Warwickshire have acknowledged a climate change emergency is upon us and made pledges to reduce their carbon impacts. The biodiversity emergency, which this strategy looks to address, is complementary and requires similar pledges and commitments from individuals, organisations and businesses across the county.

The themes, priorities and actions, and data modelling used to produce the maps have all been carefully developed with consideration for climate change addressing both mitigation and adaptation. Thereby, all supporting sectorial guidance documents to be produced to enhance this strategy will also be in consideration to the effects that climate change is having on our species and habitats.

In essence, this strategy's overarching aim to follow the Lawton Principle of "more, bigger, better and joined' will enable species to move through the county.

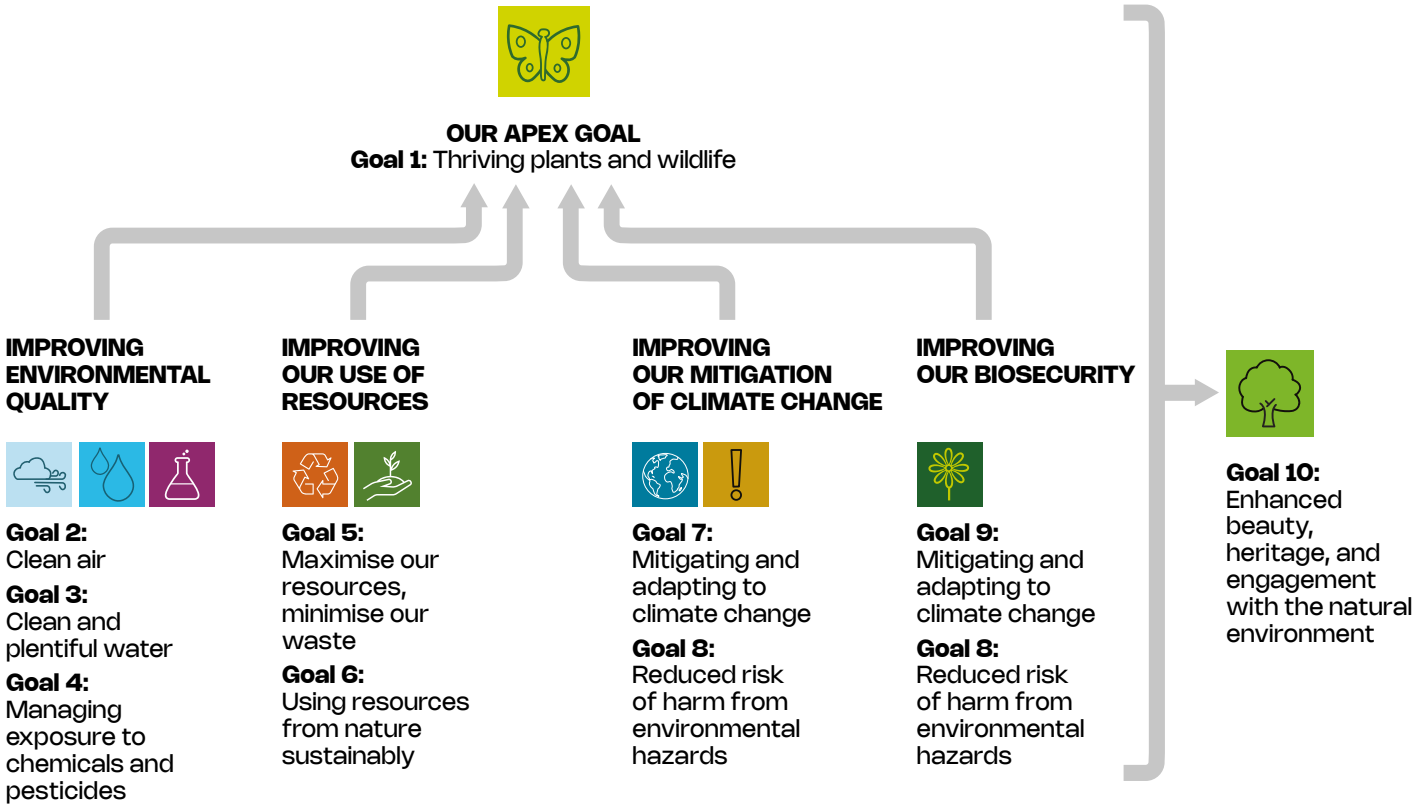


Alignment of the Warwickshire Local Nature Recovery Strategy Overarching Principles with the Environmental Improvement Plan[7] (EIP) goals

The LNRS is a comprehensive framework designed to enhance and restore natural habitats, promote biodiversity, and engage communities in environmental stewardship. By aligning its themes and overarching priorities with the EIP goals shown in Figure 2, the Warwickshire LNRS demonstrates a strong commitment to achieving a sustainable and resilient natural environment.

Table 1 shows this alignment and whilst the Warwickshire Local Nature Recovery Strategy (LNRS) aligns with many of the Environmental Improvement Plan (EIP) goals, not all EIP goals are fully addressed by the LNRS. Some EIP goals such as Goal 4: 'Managing exposure to chemicals and pesticides' and Goal 5: 'Maximise our resources, minimise our waste' are not directly addressed by the LNRS principles, but some actions may be indirectly linked.

Figure 2 : *Diagram showing the environmental Improvement Plan Goals and their connections*



Whilst the LNRS contributes significantly to many environmental goals, a comprehensive approach involving additional strategies and policies is necessary to achieve all EIP goals.

Warwickshire LNRS Themes	EIP Goals
Nature-rich Habitats	1, 2, 3, 6, 7, 8, 9,10,
Species Populations	1, 7, 9, 10
Water Resilience	1, 3, 6, 7, 10
Urban Green and Blue Placemaking	1, 2, 5, 6, 7, 10
Connecting Communities to Nature	1, 6, 10
Sustainable, Nature–Friendly Land Management	1, 2, 3, 5, 6, 7, 8, 9, 10
Natural Processes and Nature-based Solution	1, 2, 3, 6, 7, 10
Nature Markets	1, 2, 3, 4, 5, 6, 7, 8, 9, 10



Habitat Priorities and Actions

The Warwickshire LNRS identifies a range of Habitat Priorities that will deliver the Themes identified: habitats essential for supporting biodiversity and ecosystem services. Each of these habitats play a crucial role in maintaining ecological balance, supporting species, and providing environmental and social benefits to our communities. Our approach focuses on conserving, creating, enhancing, and maintaining these habitats, and by connecting them together, to ensure their resilience at landscape scale. The Habitat Priorities and their associated Actions have been prepared with wide partnership engagement to ensure alignment with both local and national environmental objectives, existing plans and strategies, Local Biodiversity Action Plans (LBAPs) plus local groups and organisations to ensure that they meet each partner's objectives. In so doing the Warwickshire LNRS aims to support all partners in their campaigning, objective setting, funding bids and most importantly delivery on the ground.

The tables that follow show the 'habitat-focused' priorities and actions that can be mapped to various degrees on the Local Habitat Map. To view the priorities and actions for the Areas that Could Become of particular importance (ACB), visit the online map here [link]:

The list below outlines Habitat Priorities in accordance with the **LNRS** guidance.

- **Habitat Priorities** are the key habitats in Warwickshire identified as being at risk or of particular importance for conservation focus.
- **Potential Actions** are the targeted, practical steps—referred to as 'measures' in statutory guidance, designed to support the recovery and protection of Habitat Priorities.

Priority Habitat and Themes	Potential Actions	Key Action Areas (Linked to LNRS Mapping) LNRS
All Habitats   Guidance: LNRS guidance Environment Improvement Plan Goals	Encourage community engagement, education, natural play and other activities that benefit Natural Health and Wellbeing and the appreciation of the natural environment where they are sympathetic to the management or species objectives of the site.	Unmappable
	Encourage the uptake of Local Nature Action Plans currently being led by parish and town councils.	Unmappable
	Encourage the development of regulatory and voluntary Nature Markets and Farm Assurance Schemes that are of High Integrity and adhere to relevant British Standards Institute standards.	Unmappable
	Promote the control of invasive species to enable native species to thrive and preserve their genetic heritage.	Unmappable
Built Environment   Guidance: Urban & Built Environment Environment Improvement Plan Goals	Identify, create, enhance and maintain nature-rich green and blue space and other nature opportunities (such as public parks and public green spaces, avenues, raingardens, green roofs and living walls) within urban and peri-urban environments to maximise biodiversity benefits for people and bring wildlife into urban centres.	Unmappable
	Encourage new developments to make meaningful, positive contributions to nature and nature's recovery on and above those required under planning and other regulations.	Unmappable
	Encourage the retrofitting of nature-based solutions and other wildlife friendly measures into existing urban and peri-urban areas.	Unmappable
	Encourage wildlife friendly gardening to assist in maximising the benefits of nature for people and bring biodiversity into urban centres or contribute to rural ecosystem service functioning (such as pollinators).	Unmappable

Priority Habitat and Themes	Potential Actions	Key Action Areas (Linked to LNRS Mapping) LNRS
Roadside Verges  Guidance: Roadside Verges Environment Improvement Plan Goals	Conserve, create, enhance, and maintain nature-rich road verges and streets to act as ecological oases and corridors through both rural and urban environments. Native species are to be promoted in rural areas whereas pictorial mixes may be considered appropriate within urban settings.	Unmappable
Sacred Grounds and Memorial Sites  Guidance: Sacred Grounds and Memorial Sites Environment Improvement Plan Goals	Create, enhance, and maintain nature-rich sacred grounds (including places of worship, burial grounds etc.) and memorial sites in ways that supports biodiversity	Unmappable

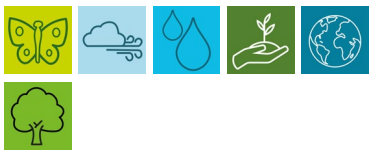


Priority Habitat and Themes	Potential Actions	Key Action Areas (Linked to LNRS Mapping) LNRS
Farmland & Horticulture (excluding Grassland)   Guidance: Farmland & Horticulture Environment Improvement Plan Goals	Encourage nature friendly, sustainable, and environmental farming practices that reduce the impacts of intensive farming and increase the biodiversity value of farmland. Actions include establishment and proactive management of nature-rich headlands, in-field trees, flora plots and pollen and nectar mixes plus reduced reliance on the use of chemicals.	Unmappable
	Promote best practice to create, enhance and maintain healthy soils, through maintaining a natural biological, chemical and physical balance.	Unmappable
	Identify, conserve, and manage above and below ground archaeological and historic monuments and features (such as tythe barns, ridge and furrow and barrows) through nature-rich habitat enhancements and management practices.	Unmappable
	Encourage tree planting, where appropriate, to increase canopy cover in farmland including by means of 'agroforestry' or by planting small copses or trees within existing hedgerows.	Priority Woodland Creation Areas
Grassland (Acid, Calcareous & Neutral)   Guidance: Grasslands Environment Improvement Plan Goals	Encourage the conservation of existing nature-rich habitat through secured management plans and appropriate policies in spatial strategies focusing on the important grassland types to any particular area.	Existing Acidic Grassland Existing Calcareous Grassland Existing Semi-Improved Grassland
	Identify, create, restore, enhance, and maintain nature-rich grassland prioritising those in strategic areas or would make significant contributions to nature's recovery.	Existing Acidic Grassland Existing Calcareous Grassland Existing Semi-Improved Grassland Priority Grassland Creation Areas

Priority Habitat and Themes	Potential Actions	Key Action Areas (Linked to LNRS Mapping) LNRS
Floodplain Meadows   Guidance: Floodplain Meadows Environment Improvement Plan Goals	Encourage the conservation of existing nature-rich floodplain meadows through secured management plans and appropriate policies in spatial strategies.	Unmappable
	Identify, create, restore, enhance, and maintain nature-rich floodplain meadows prioritising those that reconnect the watercourse to the floodplain and make significant contributions to nature's recovery.	Priority Areas for Floodplain Meadow Creation
Lowland Heathland   Guidance: Lowland Heathland Environment Improvement Plan Goals	Encourage the conservation and buffering of existing lowland heathland through secured management plans and appropriate policies in spatial strategies focusing on the important grassland types to any particular area.	Existing Lowland Heath
	Identify, create, restore, enhance and maintain lowland heathland.	Existing Lowland Heath
	Expand and connect ericaceous vegetation/ heathland and also associated habitats such as mire, acid grassland and boggy woodland.	Existing Lowland Heath



Priority Habitat and Themes	Potential Actions	Key Action Areas (Linked to LNRS Mapping) LNRS
Watercourses & Canals   Guidance: Watercourses & Canals Environment Improvement Plan Goals	Expand, restore, enhance, and maintain riparian habitat to improve biodiversity and water quality through secured management plans and appropriate policies in spatial strategies.	Existing Rivers, Ditches and Watercourses Canals
	Promote industry good practice to reduce pollution events, such as through re-routing or retrofitting nature-based solutions or pollution traps.	Existing Rivers, Ditches and Watercourses Canals
	Restore, enhance, buffer, and maintain watercourses to improve their morphology, substrate, aquatic vegetation to bring all watercourses towards at least 'good' Water Framework Directive standards.	Existing Rivers, Ditches and Watercourses Canals Priority Areas for Floodplain Reconnection and Restoration
	Promote, encourage, and restore natural flow regimes, re-naturalisation and enable natural flood management and natural flood alleviation measures.	Priority Areas for Floodplain Reconnection and Restoration Leaky barrier
	Increase watercourse connectivity through the removal of artificial barriers and, where restoration of natural function is not feasible, implement fish, eel and lamprey etc passages.	River Obstacles
	Restore, enhance, and maintain canals to improve their aquatic vegetation and marginal habitat especially along hard engineered banks.	Canal
Ponds, Scrapes and Reedbeds   Guidance: Ponds, Scrapes & Reedbeds Environment Improvement Plan Goals	Conserve, create, enhance, and maintain existing nature-rich ponds, scrapes, reedbeds and other wetland habitat including on disused mineral excavation sites or as part of restoration schemes as well as through secured management plans and appropriate policies in spatial strategies.	Ponds, pools and scrapes
	Identify and restore existing ponds and ghost ponds (where it would not be detrimental to other priority or important species or habitat).	Ponds, pools and scrapes
	Promote sensitive management and industry good practice to reduce pollution and improve water quality.	Ponds, pools and scrapes

Priority Habitat and Themes	Potential Actions	Key Action Areas (Linked to LNRS Mapping) LNRS
Standing Water, Lakes and Reservoirs  Guidance: Standing Water, Lakes & Reservoirs Environment Improvement Plan Goals	Encourage the use of nature rich, well-designed nature-based solutions for rainwater harvesting, whether through new or existing lakes and reservoirs, regardless of whether these water bodies are intended for drinking water or agricultural use.	Unmappable
Traditional Orchards   Guidance: Traditional Orchards Environment Improvement Plan Goals	Encourage the conservation of existing traditional orchards through secured management plans and appropriate policies in spatial strategies.	Existing Traditional Orchard
	Create, restore, enhance, and maintain traditional orchards and promote or encourage them to meet the People's Trust for Endangered Species Grade 1 condition.	Existing Traditional Orchard
Ancient Woodlands   Guidance: Woodlands & Ancient Woodlands Environment Improvement Plan Goals	Restore, enhance, and maintain existing Ancient Woodland, Ancient Semi-Natural Woodland (ASNW)and Plantations on Ancient Woodland Sites (PAWS). Including the restoration of PAWS to more natural woodland conditions where appropriate.	Existing Ancient Woodlands
	Encourage natural regeneration to create buffer zones and sites beside ancient woodland to retain local provenance	Existing Ancient Woodlands

Priority Habitat and Themes	Potential Actions	Key Action Areas (Linked to LNRS Mapping) LNRS
Woodland (newly created, plantation & commercial)   Guidance: Woodlands & Ancient Woodlands Environment Improvement Plan Goals	Encourage the conservation of existing nature-rich woodland through secured management plans and appropriate policies in spatial strategies.	Existing Woodland
	Create, restore, enhance, buffer, and maintain woodland to maximise its nature potential, through increasing structural and species diversity and the management of invasive non-native species (including grey squirrel and deer), prioritising those that would make significant contributions to nature's recovery and sites which will reconnect woodlands.	Existing Woodland Priority Woodland Creation Areas
	Identify and encourage woodland creation sites, prioritising historic woodland sites and where they would improve woodland connectivity using species that are resilient to climate change and conform to the Warwickshire Landscape Guidelines where the creation site is located.	Floodplain reconnect and restoration Priority Woodland Creation Areas
	Establish and promote local markets for woodland produce from woodlands that evidence their commitment to nature's recovery focusing primarily on semi-natural ancient and other broad-leaved woodlands.	Existing Woodland Floodplain reconnect and restoration Priority Woodland Creation Areas
Wet Woodland   Guidance: Woodlands & Ancient Woodlands Environment Improvement Plan Goals	Encourage the conservation of existing nature-rich wet woodland through secured management plans and appropriate policies in spatial strategies.	Wet woodland
	Create, restore, enhance, and maintain wet woodland to maximise its nature potential, prioritising those in strategic creation areas or would make significant contributions to nature's recovery.	Wet woodland Priority Areas for Floodplain Reconnection and Restoration Priority Woodland Creation Areas
	Identify and encourage wet woodland creation sites prioritising sites that will improve the water quality of any hydrologically connected watercourse.	Priority Areas for Floodplain Reconnection and Restoration

Priority Habitat and Themes	Potential Actions	Key Action Areas (Linked to LNRS Mapping) LNRS
Wood Pasture and Parkland  Guidance: Wood Pasture & Parkland Environment Improvement Plan Goals	Encourage the conservation of existing Wood Pasture and Parkland through secured management plans and appropriate policies in spatial strategies.	Wood Pasture & Parkland
	Create, restore, enhance, and maintain Wood Pasture and Parkland to maximise its nature potential, prioritising those in strategic areas or would make significant contributions to nature's recovery.	Wood Pasture & Parkland Priority Woodland Creation Areas
	Identify and encourage Wood Pasture and Parkland creation sites prioritising historic sites and where they would improve woodland or grassland connectivity using species that are resilient to climate change and conform to the Warwickshire Landscape Guidelines where the creation site is located.	Wood Pasture & Parkland Priority Woodland Creation Areas
Ancient and Veteran Trees  Guidance: Ancient & Veteran Trees Environment Improvement Plan Goals	Identify, conserve, and maintain existing and future Ancient and Veteran Trees through secured management plans and appropriate policies to maximise their nature potential.	Areas Particular Importance for Biodiversity (APIB)
	Maintain genetic provenance of Warwickshire Ancient and Veteran trees through seed collection and cuttings.	Unmappable
Scrub  Guidance: Scrub Environment Improvement Plan Goals	Create, restore, enhance, and maintain scattered and dense scrub to maximise its nature potential, prioritising those where they make significant contributions to nature's recovery.	Unmappable

Priority Habitat and Themes	Potential Actions	Key Action Areas (Linked to LNRS Mapping) LNRS
Hedgerows  Guidance: Hedgerows Environment Improvement Plan Goals	Create, restore, enhance, and maintain species-rich hedgerows prioritising those that link existing habitat together, contain standard trees and are managed to compliment other nature benefit management objectives (such as pollinators, species priorities and assemblages).	Hedgerows
Open Mosaic Habitat  Guidance: Open Mosaic Habitat Environment Improvement Plan Goals	Encourage the conservation of existing Open Mosaic Habitat through secured management plans and appropriate policies in spatial strategies. Create, restore, enhance, and maintain species-rich Open Mosaic Habitat, particularly on disused mineral excavation sites or their restoration.	Open Mosaic Habitat Open Mosaic Habitat
Quarries, stone walls, rock, stone habitat  Guidance: LNRS guidance Environment Improvement Plan Goals	Conserve, restore, enhance, and maintain existing old quarries and areas of rock/cuttings that are nature-rich and does not conflict with any geological interest.	Unmappable

Species Priorities List

Warwickshire is home to many notable, threatened and near-threatened species and require significant habitat improvements, increased connectivity, and the creation of new habitats to facilitate their population recovery and expansion. The Warwickshire LNRS's Habitat Priorities and associated actions will inherently support these species. By implementing these actions, we can establish a more extensive, interconnected, and ecologically valuable network of habitats across Warwickshire and neighbouring LNRSs which will benefit a broad range of species.



However, some species require more targeted conservation efforts beyond general habitat-based actions. These are grouped as:

- **Species Priorities:** Individual species in Warwickshire that are at risk or of particular conservation importance.
- **Priority Assemblages:** Groups of species that share similar habitat needs and face similar threats, allowing them to be addressed collectively.

Each Species Priority or Species Assemblage is supported by one or more Actions—targeted, practical steps designed to aid their recovery and long-term viability. These actions are usually bespoke and go beyond the general habitat actions provided for Habitat Priorities, ensuring that the specific needs of these species or groups are met.



The tables below includes:

- **17 Species Priorities** identified for Warwickshire,
- **16 Priority Assemblages** of associated species for Warwickshire, and
- **3 Species for Potential Reintroduction or Translocation** within Warwickshire.

The methodology used to select these species is detailed in LNRS Appendices.

Species Priorities

Species *(latin name)*	Species Detail and Background	Actions that will be promoted and encouraged	Key Action Areas (Linked to LNRS Mapping)
Bittern ***(Botaurus stellaris)***	Bitterns are regular winter visitors to Warwickshire, but their breeding numbers remain low. To improve this, we need to focus on managing and enhancing their habitat, particularly reed beds, to encourage breeding. Current efforts include improving reedbed habitat at Brandon Marsh Site of Special Scientific Interest (SSSI), creating deeper pools where they can hunt and breed and at Middleton Lakes, on the Staffordshire border. The Species Recovery Programme Fund has funded a project in 2023 – 2025 for Bittern in Warwickshire targeting actions to ensure its survival. Bitterns are also included in several neighbouring Responsible Authorities' LNRS's highlighting the regional importance of their conservation.	▪ **Increase Fish Populations:** Enhance fish stocks in wetlands to provide a reliable food source for Bitterns. ▪ **Create, Manage and Enhance Reedbeds:** Develop and restore reedbed habitats to create suitable breeding and feeding grounds. Including practices such as lowering reedbeds at risk from drying out and managing the reed structure to achieve diversity within the reedbed (aiming for no more than 30 per cent being older than 7 years and no more than 5 per cent of the area being scrub). Manage the reedbed through cyclical cutting of different sections of reed over time and regularly remove willow.	Unmappable
Black poplar ***(Populus nigra)***	The Black Poplar is Britain's rarest native timber tree. In Warwickshire, most specimens have been deliberately planted, including in urban parks and streets. Some of the oldest rural trees may be descendants of naturally occurring ones. Since 2005, the 'Big Tree Hunt' has significantly increased the number of recorded specimens from 30 to nearly 600, one of the highest figures for any county. About a third of our trees are within floodplains, with important concentrations of mature trees occurring along parts of the River Blythe, River Tame, River Alne, lower River Avon and the lower River Dene. Notable specimens can be seen at Coombe Country Park and the Moathouse Car Park in Stratford-upon-Avon. Despite this, only about 20 female trees have been confirmed.	▪ **Establish a tree nursery:** for growing local provenance black poplar with the intention of increasing the number of trees (in particular females) in Warwickshire. ▪ **Increase the numbers of black poplar** in Warwickshire by planting new specimens, preferably using those established in a Warwickshire tree nursery. ▪ **Retain dead and dying poplars:** where feasibly possible and don't remove or burn deadwood.	Black Poplar Action Areas

Brown Hairstreak *(Thecla betulae)*	The brown hairstreak butterfly, a rare species in the UK, is experiencing a promising spread from a population in Worcestershire. As a neighbouring county to Worcestershire, Warwickshire plays a crucial role in supporting the expansion of this species. The main threat to the brown hairstreak is the poor management or removal of mature blackthorn habitats, which are essential for their survival. These butterflies benefit from long-term habitat restoration and the creation of sheltered (but unshaded) stands of blackthorn, which should be allowed to grow to about 5 meters in height. Populations do not readily spread away from blackthorn, so connecting habitats is key to their expansion. In Warwickshire, the brown hairstreak has been rediscovered in the Princethorpe area and the Heart of England Forest (which is now a key location for the species), with populations spreading in both areas. Conservation efforts in Warwickshire are vital to ensure the continued expansion and survival of this species.	▪ **Retain Existing Blackthorn Thickets:** Preserve current thickets of blackthorn and mature hedges containing blackthorn. ▪ **Plant New Blackthorn:** Establish new thickets and hedgerows with blackthorn. ▪ **Manage and Coppice:** Implement management and coppicing routines for hedges, trees, and thickets suitable for the species. ▪ **Increase Habitat Connectivity:** Enhance connectivity by creating and extending stands, trees, and hedgerows with blackthorn to link existing areas. Develop wide rides, glades, and scrub edges in and around woodlands. ▪ **Correct Hedgerow Management:** Manage blackthorn-rich hedgerows with a rotational cutting cycle of 3 years (or 4-5 years if necessary). Connectivity is important as this species relies on appropriately managed hedgerows between known sites. Brown hairstreak favours the south-facing sides of hedges and favours 1-2 years of hedge growth. Blackthorn suckering should be retained on both sides of the hedgerow. ▪ **Citizen Science:** Utilise citizen science for recording and mentoring efforts. ▪ **Establish New Orchards:** Create new orchards as it is a useful habitat for the species. Blackthorn is the primary food plant, but fruit trees are also utilised. ▪ **Co-benefits:** Use blackthorn planting to support brown hairstreak and deliver additional benefits, including deterrence of anti social behaviour through defensive planting.	Unmappable

Species *(latin name)*	Species Detail and Background	Actions that will be promoted and encouraged	Key Action Areas (Linked to LNRS Mapping)
Common Lizard *(Zootoca vivipara)*	The Common Lizard is a severely declining species in the Warwickshire Strategy Area. They are found in various habitats, including heathlands, grasslands, and woodlands. However, their populations have been dwindling due to habitat loss and fragmentation.	▪ **Safeguard and appropriately manage key habitats** such as Baddesley Common and Kenilworth Common. ▪ **Maintain railway lines and other corridors** to ensure they remain viable pathways for lizard movement. ▪ **Expand suitable habitat** on adjacent to corridors and locations of known recent records.	Common Lizard Action Areas
Eurasian Curlew *(Numenius arquata)*	Dependent on wet grassland and marsh for breeding and feeding. In Warwickshire, the species faces severe challenges due to habitat loss and degradation and predation of fledgelings. As of 2024, only five pairs were identified in the Strategy Area, highlighting the urgent need for conservation efforts. Fencing techniques have proven successful in supporting curlews to hatch chicks with a good success rate in neighbouring Counties. Warwickshire's farmers, nature recovery organisations, and volunteers should continue to adopt and support these methods to aid in the recovery of curlew populations.	▪ **Fencing:** Erect protective (electric) fencing around known nests to prevent disturbance and predation. ▪ **Conservation Grazing:** Apply appropriate conservation grazing practices to maintain suitable habitat conditions for Curlews. ▪ **Predator Control:** Predator control should be utilised where appropriate to increase adult and chick survival rates. ▪ **Expand suitable habitat:** to increase breeding areas and increase breed success as well as increased breeding pairs.	Curlew Action Areas
Eurasian otter *(Lutra lutra)*	Otter is recovering well within the Strategy Area but there are hot spots where road traffic collisions (specifically where roads cross watercourses) are causing high incidents of mortality.	▪ **Retrofit mammal ledges under bridges:** at known road–watercourse intersections to reduce road traffic accidents when rivers are in flood. ▪ **Erect fences** alongside roads to direct otters to safe crossing points	Otter Action Areas

European Beaver *(Castor fiber)*	Individual wild beavers have been recorded infrequently in north Warwickshire from 2023 and there are established populations in the Tame Anker Mease catchment as well as several hundred wild beavers in England as of 2025, therefore their natural arrival is feasible due to dispersal from established populations elsewhere in the UK. Beavers play a pivotal role in the restoration of riverine habitats and the enhancement of ecosystem health. Their activities, including dam construction and wetland creation, foster a diverse range of wildlife, establishing them as a keystone species. This strategy endorses the natural arrival of beavers, ensuring their integration into the local environment is appropriate. Key initiatives should focus on engaging with landowners, managing potential conflicts, and monitoring the impacts of beavers on the landscape.	▪ **Enhance riparian habitats:** to support the natural arrival and spread of beavers. Allow natural revegetation of buffer zones next to watercourses to provide space for beavers to forage, build dams and create wetlands. Suitable habitats include a mix of woodlands, trees, shrubs, grasses, and water-dependent vegetation. ▪ **Encourage beavers to settle in locations that offer significant ecological benefits:** including improved ecosystem structure, hydrology, water quality, and freshwater ecology. ▪ **Plant suitable tree species that coppice easily:** for example, willow, aspen, poplar to encourage beavers to settle in suitable locations. ▪ **Raising Public Awareness:** Educate the public about the benefits of beavers and their role in natural flood management (NFM). ▪ **Engage landowners:** in supporting return of beavers to the county and support a system to address any conflicts that may arise in the future.	Unmappable



Species *(latin name)*	Species Detail and Background	Actions that will be promoted and encouraged	Key Action Areas (Linked to LNRS Mapping)
Hazel dormouse *(Muscardinus avellanarius)*	Despite their expected presence in large, deciduous, semi-natural woodlands in the Strategy Area, dormice are known only in a few sites. Efforts to reintroduce dormice began in 1998 with 65 individuals introduced to Bubbenhall Wood. Surveys in 1999/2000 found dormice in Brandon Wood and four other isolated locations. Subsequent introductions in 2009–2010 at Windmill Naps and in 2012 at Alne Wood have shown mixed success. Further releases in 2017 and 2018 aimed to restore habitat continuity through the Dunsmore Living Landscape Partnership Scheme. There has been successful natural breeding, retaining the population. Despite these efforts, dormice are struggling to expand from the relocation areas, highlighting the need for continued conservation focus.	▪ **Appropriate hedgerows management–:** to allow existing populations to expand (increasing landscape connectivity). ▪ **Coppicing and thinning of regenerating woodland:** Regular coppicing and thinning help maintain a dense understorey and create a mosaic of different habitat types and ages, ensuring continuous food supply and nesting sites. Keep some standards throughout the woodland. ▪ **Deer management:** Manage deer populations to prevent overgrazing or implement ways to protect young trees and shrubs from deer browsing, ensuring the growth of a diverse and dense understorey. ▪ **Monitoring:** continue to maintain knowledge of the population and breeding success.	Unmappable



Hedgehog *(Erinaceus europaeus)*	Hedgehogs will benefit from general habitat improvements such as hedgerow creation and appropriate land management, as well as nature-friendly farming techniques. However, bespoke actions are essential to support hedgehogs in urban and semi-urban areas, where they face unique challenges.	▪ **Promote Wildlife-Friendly Gardening:** – Reduce the use of pesticides. – Provide areas with longer grass and reduced mowing, for foraging areas and shelter in gardens. – Create compost, log, and leaf piles. – Ensure ponds are not steep-sided or have ramps to allow hedgehogs to climb out. – Encourage allotments to retain hedgerows and shelter areas ▪ **Increase Habitat Permeability:** Promote the creation of 'hedgehog highways' (13cm x 13cm holes in fences). These should be listed as a planning condition on new-build sites. ▪ **Professional Guidance:** Ensure greenspace managers, landscapers, and other professionals receive specific guidance or training on hazards, mitigation, and appropriate timings for habitat clearance, including promoting the reduction of pesticides in public parks and spaces to remove toxic chemicals ▪ **Public Awareness:** Educate public on needs of hedgehogs and the simple actions to maintain and expand populations.	Hedgehog Action Areas
Lesser horseshoe *(Rhinolophus hipposideros)*	The lesser horseshoe bat is rare in the British Isles, primarily found in Wales, western England, and western Ireland. They are particularly sensitive to disturbance, especially at their maternity and hibernation roosts. This species will benefit from general habitat improvements and increased connectivity between habitats but conservation efforts for lesser horseshoe bats should focus on protecting their roost sites and ensuring the availability of suitable feeding habitats.	▪ **Identify, safeguard, manage and create suitable habitat around maternity roosts within the Core Sustenance Zone (CSZ);** such as broadleaved woodland, wooded riparian corridors, as well as along mature tree lines and tall hedgerows that have associated hedge margins that support prey insects. ▪ **Identify, safeguard and/or create suitable hibernation roosts;** to secure populations and enhance colonisation.	Lesser horseshoe Action Areas

Species *(latin name)*	Species Detail and Background	Actions that will be promoted and encouraged	Key Action Areas (Linked to LNRS Mapping)
Osprey *(Pandion haliaetus)*	Ospreys are visitors to Warwickshire, using known migratory pathways through the region. They occasionally stop to hunt in the area's wetlands and reservoirs. Despite the presence of potentially suitable habitats, Ospreys are not known to breed in Warwickshire. Conservation efforts should focus on encouraging Ospreys to breed within the Strategy Area.	▪ **Install nest platforms:** in suitable locations near large waterbodies and other suitable habitat. This should also include the implementation of a 400-metre exclusion zone around nest sites/ platforms to protect nests and prevent disturbance. ▪ **Protection:** Measures should be taken to protect nest sites from persecution and egg collection. ▪ **Desilting Lakes:** Consider desilting lakes to provide sufficient food sources where appropriate and required. ▪ **Raise Awareness:** Promote and improve communication and information about the requirements of ospreys and how to protect fishery areas, in order to prevent conflict.	Unmappable
Slow worm *(Anguis fragilis)*	The slow worm is a declining species in Warwickshire, facing challenges from habitat fragmentation and loss. They are also subject to predation by pheasants. Slow worm will benefit from general habitat improvements such as appropriate grassland and woodland management and creation and known populations are present in Kenilworth Common nature reserve and Brandon Marsh nature reserve. However, bespoke actions are essential to support slow worm in urban and semi-urban areas, where they face unique challenges.	▪ **Raise awareness:** of the importance of gardens and allotments for wildlife ▪ **Establish/create suitable habitat and buffer strips** in public parks, churchyards and cemeteries and nature reserves to support population ▪ **Promote Wildlife-Friendly Gardening to support slow worm and their prey:** -Promote creation of wildlife ponds in gardens and allotments -Identify and retain any confirmed or potential hibernation sites. -Avoid using pesticides	Unmappable

Snipe *(Gallinago gallinago)*	The snipe, listed on the UK Amber List of Birds of Conservation Concern is declining markedly throughout the county and is experiencing a significant decline in Warwickshire due to habitat loss and there are no known breeding pairs of snipe in the County. Whilst this species will benefit from general wetland management and improvements, bespoke actions are required to help this species thrive. Snipe is also a species priority in neighbouring RAs, highlighting the regional importance of their conservation.	▪ **Appropriate Habitat Management:** Implement suitable cattle grazing practices to maintain optimal ground conditions. ▪ **Maintain Water Tables:** Ensure water tables are within 20cm of field level throughout the breeding season to provide soft, damp soils. ▪ **Fencing:** Erect protective (electric) fencing around known nests to prevent disturbance and predation.	Snipe Action Areas



Species *(latin name)*	Species Detail and Background	Actions that will be promoted and encouraged	Key Action Areas (Linked to LNRS Mapping)
Water vole *(Arvicola amphibius)*	Water voles have experienced drastic declines in England. By 2010, water vole numbers in Warwickshire had plummeted by up to 95%, with fragmented colonies primarily in the Coventry/ Nuneaton area and a few isolated colonies elsewhere. However, by 2018, the situation had improved due to mink displacement by otters and targeted habitat enhancements. Water voles have since expanded their range along the Coventry and Oxford canals, with significant populations at the Hawkesbury and Marston junctions. The isolated population on Noleham Brook remains, and extending the potential Local Wildlife Site at Long Marston could further aid their dispersal. The Species Recovery Programme Fund funded in 2023-2025 a project in Warwickshire aimed at ensuring the survival of water voles. Conservation efforts, including reconnecting fragmented populations and extending potential Local Wildlife Sites, are crucial for their continued survival.	▪ **Monitor and Reduce Mink Numbers:** Monitor mink distribution and reduce populations to lessen impacts on water voles, using sensor equipped mink rafts and catchment wide trapping. ▪ **Reduce Livestock Grazing:** Fence off buffer zones of 2m or more from the water's edge to reduce trampling but allow access for periodic grazing of the buffer zones. Create designated livestock drinking areas or use off-stream watering troughs or pasture pumps. ▪ **Control Trees and Scrub:** Manage the number of trees and scrub along waterways to prevent them from dominating the banks or overshading vegetation that water voles rely on for food and shelter. ▪ **Habitat Management:** If required, cut bankside vegetation on a two-year rotation (or longer), leaving one bank uncut each year. Cutting should take place in early Autumn, from late September. De-silt ditches (only remove silt, do not remove any soil from banks or sides of channel) on a five-year rotation, avoiding machinery that could crush fragile banks. ▪ **Encourage Grassy Buffer Strips:** Create buffer strips of 4-6m wide along watercourses, ditches, and in-field ponds, especially along intensively managed grassland or cultivated fields. ▪ **Create and restore habitat:** Create pools connected to watercourses and canals, restore straightened ditches and streams by re naturalising channels and increasing bank habitat, and remove redundant hard engineered embankments to enable burrowing and vegetation growth. ▪ **Soften Engineered Embankments:** Establish vegetation along hard engineered embankments to give food plants and access to and from canals.	Water vole Action Areas

White clawed crayfish (Austropotamobius pallipes)	The UK is home to approximately a quarter of the world's population of white-clawed crayfish, the country's only native crayfish species. However, it is under threat due to the spread of invasive non-native crayfish, which are driving native crayfish towards extinction through the spread of crayfish plague and competition for resources (refuges in particular). Ensor's Pool in Nuneaton, a Special Area of Conservation, was once a notable site for white-clawed crayfish but surveys in 2014 and 2015 found no native crayfish, likely due to non-native crayfish infection. In Warwickshire, white-clawed crayfish are only surviving in very localised areas and are vulnerable to extinction. Key locations include the River Alne and its tributaries, the Coventry Canal, and possibly Newbold Quarry. Populations may also exist in several other rivers and at Middleton Hall. The River Blythe population is thought extinct, replaced by signal crayfish. Local Wildlife Sites for white-clawed crayfish include the River Alne, and Perch Hill Quarry. The Species Recovery Fund has funded a project for white clawed crayfish in Warwickshire targeting the creation of an Ark site and reintroductions of the species.	▪ **Strategic Approach:** Develop a regional strategy to retain the species — including reintroduction / translocation actions (see Potential Reintroduction/ Translocations table below). ▪ **Implement Biosecurity Actions:** Control crayfish plague by promoting the 'Check Clean Dry' biosecurity campaign at all watercourses. ▪ **Control Invasive Signal Crayfish:** Implement actions to control the population of invasive signal crayfish if suitable techniques emerge. ▪ **Disease Control:** Focus on controlling crayfish plague through community and angler awareness of biosecurity actions. ▪ **Prioritise Habitat Needs:** Ensure consistent, steady flows of good quality water. Offer numerous natural (or artificial where appropriate) refuges along riverbanks to provide hiding spots from predators.	White clawed crayfish Action Areas





Species *(latin name)*	Species Detail and Background	Actions that will be promoted and encouraged	Key Action Areas (Linked to LNRS Mapping)
White-letter Hairstreak *(Satyrium w-album)*	The white-letter hairstreak butterfly has faced significant declines nationally over recent decades, largely due to the loss of elm trees to Dutch Elm Disease. Elm trees, which are now relatively rare, are crucial for the survival of this species. Targeted conservation actions around remaining, or newly planted elm sites are essential. In Warwickshire, the white-letter hairstreak is widespread (which is rare countrywide) and holds a nationally significant population, making the region a core area for this species in the UK. Efforts to protect and enhance elm habitats, are vital for the continued survival of this butterfly in Warwickshire.	▪ **Retain and Plant Elm Trees:** Preserve existing elm trees and plant new disease-resistant elms (noting that no elm is currently fully disease resistant and the most suitable species should be used at the time of planting), especially within 2km of existing elm woodlands. ▪ **Avoid Felling Healthy Elms:** Do not cut down mature, healthy elm trees as a precaution against Dutch Elm Disease. ▪ **Encourage Elm Suckers:** Where appropriate, allow elm suckers to grow wherever they appear. ▪ **Introduce Coppicing:** In areas affected by Dutch Elm Disease, implement coppicing on a 10-year cycle. ▪ **Manage Hedgerow Shelterbelts:** Maintain hedgerow shelterbelts containing elm and avoid cutting edges where new elm suckers appear. ▪ **Enhance Woodland Rides and Glades:** Improve rides and glades and create extensive networks within woodlands. ▪ **Connect and expand Habitats:** Link habitats with hedgerows containing Wych Elm (Ulmus glabra) and disease-resistant elms as hedgerow trees. ▪ **Plant other hosting species;** consider the planting of suitable non-native species where appropriate.	White-letter Hairstreak Action Areas

Willow tit *(Poecile montanus)*	The willow tit, whose core range includes mid-Wales and the Midlands, is extremely rare and on the brink of extinction in Warwickshire. Climate change is significantly impacting their survival; however, they are present in very low numbers in the Tame Valley NIA. The Species Recovery Programme Fundhas funded a project in 2023-2025 aimed at implementing targeted actions to secure the survival of the willow tit in the region. This species will benefit from general actions to improve, create and connect wet woodland and ex quarries and abandoned industrial/brownfield sites but bespoke, immediate and effective conservation actions are essential to ensure the species' continued presence in Warwickshire.	▪ **Surveying:** Identification and safeguarding of key remaining nesting sites and population strongholds. Monitoring can include 'call back' surveys in early spring. ▪ **Increase availability of specialist nest sites:** in key population strongholds — such as rotting logs in suitable positions. ▪ **Retain and create a successive supply of deadwood:** such as tall stumps, within and around wet woodland and scrub. ▪ **Create structural diversity and promote dense scrub growth:** near willow tit nesting sites through selective felling or the reintroduction of coppicing within damp woodlands, former quarries, abandoned industrial/brownfield and open mosaic sites ▪ **Restore wet woodlands:** by reversing drainage where suitable. ▪ **Improve Connectivity:** To improve the stability of willow tit populations, link up suitable habitats by creating or retaining scrub lined river corridors and mature hedgerows.	Willow tit Action Areas



Priority Assemblages

Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Aspen *(Populus tremula)* A Leaf-rolling Weevil *(Byctiscus Populi)* *(Sciota Hostilis)* *(Phyllonorycter Sagitella)* Light Orange Underwing *(Archiearis Notha)* Dusky clearwing (*Paranthrene Tabaniformis)*	Aspen is an important species for a number of invertebrates in the West Midlands. **Leaf-Rolling Weevil:** Feeds on Aspen, with Oversley Wood part of a key woodland alignment in the West Midlands. Whilst ideally the population size and range in Warwickshire should be increased by further reintroductions to historic and appropriately managed sites, the current population at Oversley Wood is not strong enough at present to source reintroductions. Details on how the Forestry Commission are managing Oversley Wood are detailed within this document: warwickshire woodlands forest plan 24-34 web use.pdf **Both *Sciota hostilis* and *Phyllonorycter sagitella:*** require mature Aspen for their survival. **Light Orange Underwing:** This species also depends on mature Aspen. **Dusky Clearwing:** Recently rediscovered in Warwickshire in 2021, this species prefers wet woodlands and river valleys with Aspen, making it crucial for the survival of the Dusky Clearwing.	▪ **Retention and Planting:** Retain and plant Aspen within woodlands to support the survival of various invertebrate species. ▪ **Regeneration for Leaf-Rolling Weevil *(Byctiscus populi):*** – Implement coppicing to provide young Aspen, which is crucial for this species. – Encourage suckering and sapling stages of Aspen growth, preferred by the weevil. – Allow Aspen suckers at the edge of rides to mature by clearing around them during ride management. – Maintain sheltered, warm pockets of woodland edge habitat. ▪ **Habitat management for *Sciota hostilis, Phyllonorycter sagitella* and *Light Orange Underwing:*** – Ensure mature Aspen develop with longer rotation periods for coppice with standards. A 12 year coppice cycle is recommended to cater for both species. ▪ **Habitat management for Dusky Clearwing:** – Maintain wet woodland, broad-leaved woodland, and river valleys where Aspen and Poplar grow. ▪ **Diverse Aspen Ages:** – Various ages of Aspen are required to support all these species. – Practice coppicing on long rotations, allowing some Aspen to grow older, leaving some as standards, and coppicing others to encourage new growth. – Tailor management to specific species where known.	Aspen Assemblage Action Areas

Bats Western Barbastelle (*Barbastella Barbastellus)* Serotine *(Eptesicus Serotinus)* Bechstein's Bat *(Myotis Bechsteinii)* Brandt's Bat (*Myotis Brandtii)* Daubenton's Bat *(Myotis Daubentonii)* Whiskered Bat (*Myotis Mystacinus)* Natterer's Bat (*Myotis Nattereri)* Leisler's Bat *(Nyctalus Leisleri)* Noctule *(Nyctalus Noctula)* Nathusius's Pipistrelle *(Pipistrellus Nathusii)* Common Pipistrelle (*Pipistrellus Pipistrellus)* Soprano Pipistrelle (*Pipistrellus Pygmaeus)* Brown Long-eared Bat: (*Plecotus Auritus)* Lesser Horseshoe Bat (also see Species Priorities)	There are 18 species of bat in the UK and 14 bat species have been recorded in Warwickshire. Bats can be found in almost all habitat types and general habitat improvement actions/ appropriate management/ improved connectivity will benefit this assemblage. However, human disturbance needs to be addressed particularly the effects of light and noise in key areas/corridors, particularly around roost sites.	▪ **Mitigate effects of light and noise in key areas/corridors:** especially near known roost sites for all species, by maintaining unlit areas, reducing light trespass, and implementing dimming or partial night lighting. ▪ **Dark Corridors:** Restore and retain dark corridors along waterways. Where lighting is unavoidable, use best practice guidance and avoid the use of white and blue light. ▪ **Safeguard roost sites:** particularly maternity and hibernation roosts of rarer species. ▪ **Create hibernation and maternity roosts:** create purpose-built bat barns and towers in or adjacent to core sustenance zones. ▪ **Community Engagement:** Promote wider understanding of the problem by identifying community members who will pioneer light management. ▪ **Hedgerows with high vegetation and trees:** Promote tall hedges with standard trees, and no gaps wider than 5-10m, to provide important commuting and foraging corridors for bats. ▪ **Night-flowering species:** Encourage the planting of night flowering species such as campions and honeysuckle that attract moths and other night flying invertebrates. ▪ **Connectivity:** Promote the creation, enhancement and bat-friendly maintenance of hedgerows and other connectivity features to link woodlands and other roost sites to for foraging sites and zones.	Unmappable

Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Birds of Wet Woodland Willow Tit (also see Species Priorities) Marsh Tit *(Poecile Palustris)* Lesser Spotted Woodpecker *(Dryobates Minor)*	The birds within this assemblage, will benefit from the actions set out for wet woodlands including the creation of new wet woodlands. However, to help these species group thrive, additional actions are necessary in woodlands where they are present or could potentially frequent. These actions include targeted conservation actions and habitat enhancements tailored to their specific needs.	▪ **Identify and Safeguard Nesting Sites:** Protect key remaining nesting sites and areas where populations are still present. ▪ **Monitor Populations:** Regularly monitor these areas, focusing on the impacts of competition and predation. ▪ **Increase Nest Site Availability:** Enhance the availability of specialist nest sites in key areas. ▪ **Create areas of dense under canopy and ample dead wood within new and existing Wet Woodlands:** to provide specific habitat nesting. ▪ **Improve Habitat Connectivity:** Enhance connectivity of remaining populations by creating new wet woodlands in targeted areas. See willow tit in the Species Priorities table above for more details specific to willow tit.	Birds of Wet Woodlands Action Areas



Deadwood Assemblage *Species dependent on deadwood (dead, dying, and decaying) including detritovores, invertebrates, fungi and lichen*	This assemblage will benefit with proper management of ancient and long-established woodlands, wood pasture, parklands, and ancient and veteran trees, all of which include deadwood. However, some additional actions have been provided to ensure this assemblage group is able to thrive in Warwickshire.	▪ **Retain Older Trees:** Preserve older trees that are typically removed for health and safety reasons or for tidiness. ▪ **Keep or Introduce Dead, Decaying, or Dying Wood:** As far as safe and possible, retain or introduce dead, decaying, or dying wood in the environment. Ensure a range of sizes and ages of deadwood, including standing deadwood (upright trees, trunks, or stumps), fallen deadwood (wood on the floor), and deadwood branches on live trees. Where management of dying trees is necessary look to manage the declining tree by reducing the height of dead and dying trees in stages to make them safe and prolong the presence of dead and dying wood in the location. ▪ **Vernalisation technics:** consider the deliberate damaging or wounding of 'younger' trees to accelerate the development of microhabitats typical of large, old trees (veterans) ▪ **Minimise Land Use Intensification Impacts**: Implement actions to reduce the impacts of land use intensification, such as minimising root damage or concentrating defaecation in shaded areas increasing nitrogen impacts that impacts lichens ▪ **Avoid Cutting Up Dead Limbs and Fallen Trunks:** Prevent changes in the microclimate of the heartwood decay environment by not cutting up dead limbs and fallen trunks. ▪ **Log Piles:** Where log or wood piles are required, orientate them north—south. Where possible, use a mix of species and partially bury logs to support a wide range of beetles and fungi. ▪ **Manage woodland grazing appropriately:** ensure grazing levels enable regeneration. Where there is no grazing in woodlands, consider introducing and carefully maintain grazing in woodlands to prevent older trees from being smothered by secondary growth. ▪ **Avoid chemical use:** Avoid using fungicides, pesticides and fertilizers to allow and encourage fungal growth on deadwood. ▪ **Natural Regeneration of Larger Trees:** Through allowing and/or planting native thorny scrub in wood-pasture and parkland. This can enable natural regeneration of larger trees, and species like Hawthorn are key nectar sources for saproxylic invertebrates.	Deadwood Assemblage Action Areas

Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Scarce Wall Ferns Brittle bladder-fern *(Cystopteris Fragilis)* Maidenhair Fern (*Adiantum Capillus-veneris)* Rusty-back fern (*Asplenium Ceterach)*	These ferns typically grow in mortar crevices, often on historic walls and within churchyards. Their survival is increasingly at risk due to modern preferences for urban cleanliness and tidiness, the replacement of aging structures where they are found, and the destruction of their habitats through re-plastering or other excessive and uninformed 'tidying' practices.	▪ **Identify, monitor, and safeguard sites for scarce wall ferns,** ensuring sites are not disturbed, removed, or restricted. ▪ **Promote public awareness and education.** Inspire community stewardship to help safeguard these plants, as well as informing land managers especially churchyard and parish management groups on the need to conserve existing wall ferns encouraging them not to use sprays or mechanical means to remove them.	Unmappable



Farmland Birds Corn Bunting (*Emberiza Calandra)* Yellowhammer (*Emberiza Citrinella)* Linnet *(Linaria Cannabina)* Yellow Wagtail (*Motacilla Flava)* Tree Sparrow (*Passer Montanus)* Skylark *(Alauda Arvensis)* Lapwing (*Vanellus Vanellus)* Barn Owl (*Tyto Alba)* Grey Partridge (*Perdix Perdix)* Turtle Dove (*Streptopelia Turtur*) Reed Bunting (*Emberiza Schoeniclus)* Swallow (*Hirundo rustica)*	A substantial number of our characteristic farmland birds have declined dramatically in range and number over recent decades. Approximately 49% of Warwickshire is classified as Phase 1 'cultivated and disturbed' land, encompassing habitats like amenity grassland, arable land, and introduced shrub. Given that a significant portion of Warwickshire's land is used for agriculture, it is crucial to focus on species that can benefit from sustainable farmland management to achieve population recovery. The species in this assemblage are expected to benefit from wider habitat action across the county to create and appropriately manage habitats including grasslands, hedgerows, wetland-edges, and floodplain meadows, however, appropriate management of farmland is crucial for this assemblage group.	▪ **Enhance Arable Land:** Create wildflower, grass, and nectar-rich margins or plots to boost insect populations and provide other food resources for breeding birds. ▪ **Retain Habitat Diversity:** Maintain diverse habitats and unfarmed wild corners to support birds that feed on invertebrates. Keep and/or plant trees, hedgerows, ditches, grass banks, scrub, bramble, and/ or gorse to provide diverse habitats and foraging opportunities. ▪ **Provide and Maintain Seed Sources:** Support birds by providing seed during late winter or allowing plants to go to seed in suitable areas. ▪ **Manage Ploughing:** Reduce, delay, or avoid ploughing after harvest to increase winter stubble cover. Spray (if only absolutely necessary) and cultivate stubbles as late as possible in spring. Consider not using pre-harvest desiccants enabling greener stubbles. Consider sowing or establishing winter cover crops wherever possible. ▪ **Manage Hedgerows:** Avoid cutting hedgerows before March to provide winter berries. Also cut hedges on a rotational basis, leaving some areas of the farm uncut each year to meet the various needs of the birds, and leaving some trees and high growth. ▪ **Boost Seed Food:** Provide uncut areas on grasslands, a mix of crops, stubbles, or seed-rich wild bird cover crops. ▪ **Avoid Nesting Sites during the Cutting or Grazing Silage in Spring:** identify and protect ground nests prior to cutting. ▪ **Increase Crop Rotation Diversity:** Include a range of crops in rotation, such as winter wheat and spring cereals, where possible to create a variety of crops over the farm. ▪ **Restore and Maintain Wet Features:** Maintain wet features like open wet ditches, ponds, and scrapes. ▪ **Reduce Over-Grazing:** Lower grazing levels to prevent over-grazing of pasture to maintain a varied sward structure all allow plants to flower and set seed. ▪ **Reduce Herbicide and Insecticide Use:** Minimise herbicide and broad-spectrum insecticides use to protect arable plants and insect prey. ▪ **Create Skylark Plots:** Establish Skylark plots within winter cereals. ▪ **Create Corn Bunting plots:** Establish corn bunting plots away from hedgerows or trees. ▪ **Install Nesting Boxes:** Offer nesting boxes specific to local species, such as Swallows, Tree Sparrows and Barn Owls.	Unmappable

Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Freshwater Invertebrates This includes dragonflies, damselflies, snails, sponges, mayflies, stoneflies, caddisflies, alderflies, pond skaters, some beetles, freshwater woodlice, shrimps and more. Freshwater habitats include ponds, springs, seepages, ditches, lakes, rivers and streams. Specific species include: Mere Wainscot (*Chortodes Fluxa)* Fen Wainscot (*Arenostola Phragmitidis)* Cream-bordered Green Pea (*Earias Clorana)*	Freshwater invertebrates play a vital role in maintaining clean water — helping to break down and filter organic matter. They are also an important food source for fish, birds and mammals. Their presence is the standard indicator of the health of the habitat they live in. However, many of our freshwater invertebrates are declining in the face of pollution, watercourse straightening and hard engineering, invasive species, abstraction and development, and are already being affected by climate change with an increase in water temperature. This assemblage will benefit from water quality improvements to rivers and other freshwater habitats. However, some additional actions have been provided to ensure this assemblage group is able to thrive in Warwickshire.	▪ **Introduce Large Woody Debris:** Add logs and branches into watercourses to create shelter, feeding areas, and breeding sites for invertebrates. ▪ **Plant Riparian Trees:** Establish native trees along riverbanks to provide shade, regulate water temperature, and allow roots to extend into the water, enhancing habitat complexity. ▪ **Encourage Riparian Vegetation:** Promote the growth of plants that overhang or extend into the water's edge, offering cover, food sources, and microhabitats for aquatic invertebrates. ▪ **Pond Management:** Cut reeds on a rotation to prevent encroachment. This is particularly important for Cream-bordered Green Pea. ▪ **Foodplants for Specific Species:** – Mere Wainscot – wood small-reed *(Calamagrostis epigejos)* – Fen Wainscot – common reed *(Phragmites australis)* – Cream-bordered Green Pea – various willows *(Salix)*, including osier *(S. viminalis)*	Freshwater Invertebrates Action Areas

Garden Invertebrates Garden Tiger (*Arctia Caja)* Golden Plusia (*Polychrysia Moneta)*	Some of the species in this assemblage are considered Nationally Scarce in Britain. They will benefit from general habitat improvements but are reliant on specific food plants for survival. The garden tiger moth, once a quite common moth in most of Britain, has declined in many places in the last few years largely due to climate change. The golden plusia was first discovered in south-east England in 1890, this classic 'invasion' moth species rapidly spread north-westwards, reaching Scotland, but has shown signs of range decline in recent decades.	▪ **Promote Wildlife Friendly Gardening for Invertebrates:** Encourage less intensive gardening by leaving areas undisturbed for overwintering and creating mini-meadows through reduced mowing and increased plant diversity. ▪ **Include Larval Foodplants:** The food plants of the species in this assemblage should be considered for inclusion/ promotion when designing gardens to support these invertebrates in Warwickshire. **Foodplants for Each Species:** – **Garden Tiger:** The larvae are generalists and feed on a wide variety of herbaceous plants, including foxglove, nettles, dock, and plantain. – **Golden Plusia:** The larvae feed on Delphiniums, Larkspur, and Aconitum.	Unmappable



Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Hedgerow Invertebrates Including but not exclusive of: Small Eggar (*Eriogaster Lanestris)* Pretty Chalk Carpet (*Melanthia Procellata*) Pinion-spotted Pug (*Eupithecia Insigniata)* Mocha (*Cyclophora Annularia)* Dusky-lemon Sallow (*Xanthia Gilvago)* Lesser-spotted Pinion (*Cosmia Affinis)* Clouded Magpie (*Abraxas Sylvata)* Scarce Tissue (*Rheumaptera Cervinalis)*	Some of the species in this assemblage are considered Nationally Scarce in Britain. They will benefit from general habitat improvements but are reliant on specific food plants for survival.	▪ **Provide for overwintering invertebrates:** Leave a proportion of hedgerow at a site/ on a farm uncut each year to accommodate overwintering invertebrates. ▪ **Introduce standard trees to hedgerows:** Strengthen hedgerow connectivity and habitat value by establishing standard trees, particularly oak, within existing hedgerows. ▪ **Ensure a continuous blossom sequence:** Use diverse planting mixes that provide a continuous sequence of flowering from spring through summer, ensuring a consistent food source for invertebrates, including solitary bees. ▪ **Include Larval Foodplants:** The food plants of the species in this assemblage should be considered for inclusion/ promotion when designing the habitat (i.e. hedgerows) to support these invertebrates in Warwickshire. **Foodplants for Each Species:** – **Small Eggar:** Hawthorn *(Crataegus)* and Blackthorn *(Prunus spinosa)* – **Pretty Chalk Carpet:** Traveller's-joy *(Clematis vitalba)* – **Pinion-spotted Pug:** Hawthorn and Apple *(Malus)* – **Mocha:** Evergreen Oak *(Quercus ilex)* – **Dusky-lemon Sallow:** Wych Elm and English Elm *(Ulmus procera)* – **Lesser-spotted Pinion:** English Elm and Wych Elm – **Clouded Magpie:** Wych Elm and English Elm – **Scarce Tissue:** Various species of Prunus, including Almond, Cherry, Blackthorn, and Hawthorn	Hedgerow Invertebrates Action Areas



Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Invertebrates of calcareous grasslands Including but not exclusive of: Adonis Blue (*Lysandra Bellargus)* Chalkhill Blue (*Lysandra Coridon)* Duke of Burgundy (*Hamearis Lucina)* Grizzled Skipper (*Pyrgus Malvae)* Small Blue (*Cupido Minimus)* Green hairstreak (*Callophrys Rubi)* Dark Green Fritillary (*Speyeria Aglaja*) Dingy Skipper (*Erynnis Tages)* chalk carpet moth (*Melanthia Procellata)* light feathered rustic (*Agrotis Cinerea)* Dark brocade (*Mniotype Adusta)* *(Osmia Aurulenta* *Osmia Spinulosa)* Red-tailed Mason Bee (*Osmia Bicornis)* Yellow-shouldered Nomad Bee *Nomada Fulvicornis)* Dotted Bee-fly *Bombylius Discolor)* Clover stilt (Parectopa Ononidis) *Ethmia dodecea* *(Pancalia Schwarzella* *Coleophora Squamosella* *Stephensia Brunnichella* *Commophila Aeneana)* *(Aethes Williana* *Notocelia Incarnatana)* Rock-rose Pot Beetle *(Cryptocephalus Primarius)* Rugged Oil Beetle *(Meloe Rugosus)*	Calcareous grasslands in Warwickshire are vital for invertebrates, supporting over 500 calcareous species, including many that are nationally or regionally scarce. Key species include flies, bees, wasps, moths, beetles, and bugs. Important sites for calcareous insects include the Bishops Hill – Bishops Bowl complex and Southam Quarry, which are significant for their rich invertebrate populations. Southam Quarry is particularly notable as the richest bumblebee site in the Midlands. Warwickshire is a crucial region in the Midlands for the conservation of these species, providing essential habitats for a diverse range of invertebrates. The adonis blue is not currently present in Warwickshire but is spreading northwards. It is a Species Priority in the Oxfordshire LNRS (a neighbouring RA). Invertebrates within this assemblage will benefit from calcareous grassland actions and other neutral / semi-improved grassland habitat priorities, however, bespoke actions are also required.	▪ **Manage Grassland Mosaic:** Create a mosaic of long and short grassland sward heights and bare earth areas through rotational livestock grazing, ensuring appropriate stocking densities to avoid overgrazing to encourage a wide range of invertebrates from this assemblage group. ▪ **Appropriate Grazing and Cutting:** Ensure grazing and cutting practices support the spread of required food plants. ▪ **Scrub management:** Scrub-edge conditions are required to provide shelter for many warmth-loving invertebrates associated with calcareous grassland but should be managed to ensure it does not take over. ▪ **Continue to Create Habitat for Adonis Blue:** Continue to prepare habitats for the adonis blue i.e. warm south facing slopes with sheltered hallows. ▪ **Include Larval Foodplants:** Incorporate larval foodplants in seed mixes or allow them to colonise naturally to encourage invertebrate colonisation. Seed mixes should ideally be of local provenance. **Foodplants for Each Species:** – **Adonis Blue:** Horseshoe vetch – **Chalkhill Blue:** Horseshoe vetch – **Dingy Skipper:** Common birds-foot trefoil – **Dark Green Fritillary:** Violets – **Duke of Burgundy:** Cowslip/ primrose – **Small Blue:** Kidney vetch – **Red-tailed Mason Bee:** Bird's-foot-trefoils and vetches – **Yellow-shouldered Nomad Bee:** Willows – **Dotted Bee-fly:** Ground-ivy, violets, coltsfoot	Invertebrates of Calcareous Grassland Action Areas

Light Feathered Rustic (*Agrotis Ciner)*

Bordered Sallow (*Pyrrhia Umbra)*

Ruddy Carpet (*Catarhoe Rubidata)*

Netted Pug (*Eupithecia Venosata)*

Shaded Pug (*Eupithecia Subumbrata)*

Chalk Carpet (*Melanthia Procellata)*

Reddish Light Arches (*Apamea Sublustris)*

invertebrates dependent on Devil's-bit scabious (*Succisa Pratensis*):

Marsh fritillary (*Euphydryas Aurinia*)

Narrow-bordered Bee (*Hemaris Tityus)*

Hawk-moth *(Hemaris Tityus)*

- **Clover Stilt, Ethmia dodecea, Pancalia schwarzella, Stephensia brunnichella:** Path edges
- **Coleophora squamosella:** Blue fleabane
- **Commophila aeneana:** Ragwort
- **Aethes williana:** Wild carrot
- **Notocelia incarnatana:** Rose, particularly burnet rose
- **Rock-rose Pot Beetle:** Common rock-rose
- **Rugged Oil Beetle:** Species-rich grasslands
- **Light Feathered Rustic:** Wild thyme
- **Bordered Sallow:** Restharrow
- **Ruddy Carpet:** Bedstraw
- **Netted Pug:** Bladder campion
- **Shaded Pug:** Field scabious, hawk's-beard
- **Chalk Carpet:** Common bird's-foot-trefoil, other trefoils, clovers, vetches
- **Reddish Light Arches:** Grass roots
- **Marsh Fritillary, Narrow-bordered and Bee Hawk-moth:** Devil-bit scabious



Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Open Mosaic Habitat Invertebrates (including post-industrial sites and brownfield sites) Dark Spinach *(Pelurga Comitata)* Wormwood *(Cucullia Absinthii)* Annulet *(Charissa Obscurata)* Bloody-nosed beetle *(Timarcha Tenebricosa)* Common glow-worm *(Lampyris Noctiluca)* Grizzled skipper *(Pyrgus malvae)* Dingy skipper *(Erynnis tages)* Small blue *(Cupido minimus)*	Open Mosaic Habitats in Warwickshire provide essential habitats for diverse invertebrates. These areas, characterised by bare ground, flower-rich meadows, patchy grassland, scrub, and wet areas, create high biodiversity value when combined. They occur on previously developed sites or heavily modified ground. In the Midlands, these habitats are among the best for invertebrates, including many nationally rare species. Some species in this assemblage are Nationally Scarce in Britain and rely on specific food plants for survival, benefiting from general habitat improvements and some bespoke actions are required.	▪ **Include Larval Foodplants:** When designing habitats, especially brownfield sites, include and promote food plants that support the species in this assemblage in Warwickshire. ▪ **Create Structural Diversity:** Develop and sustain a variety of sward heights and areas of bare ground (roughly 10%- 20% per site)through periodic ground disturbance and rotational scrub clearance, so that scrub is present but does not dominate. ▪ **Identify and monitor invertebrates at key sites.** **Food plant:** – **Dark Spinach:** Larvae feed on orache (Atriplex) and goosefoot (Chenopodium). – **Wormwood:** Mugwort. – **Annulet:** Common Bird's-foot Trefoil (Lotus corniculatus), Wild Strawberry (Fragaria vesca). – **Bloody-nosed Beetle:** Cleavers. – **Cinnabar Moth:** Ragwort. – **Small Blue:** Kidney Vetch. – **Dingy Skipper, Green Hairstreak:** Common Bird's-foot Trefoil. – **Dingy Skipper:** Greater Bird's-foot Trefoil. Horseshoe vetch. – **Grizzled Skipper:** Wild Strawberry, Creeping Cinquefoil, Agrimony.	Unmappable

Open Mosaic Habitat Plants Including bare ground/ disturbed ground plant specialist and post-industrial site plants	Open mosaic habitat plants face several significant threats, primarily due to changes in land use and lack of appropriate management. As these habitats often occur on previously developed land such as old industrial sites, they are frequently targeted for redevelopment, leading to direct habitat loss. When left unmanaged, natural succession allows scrub and woodland to encroach, outcompeting the specialist plant species that rely on open, disturbed ground. Additionally, a general lack of awareness and understanding of the ecological value of these sites often results in neglect or inappropriate management, further endangering the unique plant communities they support.	▪ **Maintain and Restore Open Mosaic Habitats:** Actively manage sites by clearing encroaching scrub and trees, using controlled disturbance techniques like light grazing or soil scraping, and restoring degraded areas—such as former industrial or brownfield sites—through reintroduction of native plant species and appropriate habitat management. ▪ **Safeguard Sites through Planning and Development Collaboration:** Protect key habitats from redevelopment by incorporating them into local planning policies, and work with developers to integrate open mosaic habitat features into new projects wherever possible. ▪ **Raise Awareness and Involve Communities:** Educate the public and landowners about the ecological value of open mosaic habitats and encourage citizen science initiatives to involve volunteers in monitoring and conservation efforts.	Unmappable

Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Pollinators Pollinating insects, including, but not limited to bees, hoverflies, butterflies, moths and flower-visiting beetles. **Including Warwickshire's Rare Bumblebees:** Red-shanked Carder Bee (*Bombus ruderarius)* Brown-banded Carder Bee (*Bombus humilis)* Large Garden Bumblebee (*Bombus ruderatus)* **Associated species:** Necklace Ground Beetle (*Carabus monilis)*	Pollinating insects are widely recognised for their benefits to food production. In Warwickshire, pollinators such as bees, butterflies, beetles, and wasps are essential for the health of our environment and the food we eat. However, they face significant challenges due to habitat loss, urban growth, climate change, and pesticide use. Efforts like the #Plant4Pollinators campaign aim to support these vital species by encouraging the planting of pollinator-friendly plants. Supporting pollinators is crucial for maintaining biodiversity and ensuring the sustainability of food production in Warwickshire. Red-Shanked Carder Bee: One of the sub-region's rarest surviving bumblebees, showing severe national declines. Brown-Banded Carder Bee: Another rare bumblebee species facing national declines.	**Actions for Landowners and Farmers:** ▪ **Safeguard and Restore Wildflower-Rich Grasslands:** Prioritise safeguarding existing wildflower-rich grasslands and restore abandoned or heavily grazed areas. Preserve permanent pastures with diverse flowers and features like anthills. Protect existing flower-rich meadows from ploughing, spraying, or fertiliser input. ▪ **Reduce Pesticide Use:** Minimise the use of pesticides to protect pollinators. ▪ **Create Bee Banks and Hotels:** Establish bee banks for ground-nesting bees and set up bee hotels for solitary bees. ▪ **Promote Wild Grasslands:** Allow areas of grassland to grow wild or create wildflower meadows. ▪ **Manage Hedgerow Cutting:** Rotate the cutting of hedgerows on a three-year basis to ensure continuity of food resources. ▪ **Enhance Hedgerows:** Plant shrubs and trees that flower at different times of the year and manage hedgerows to provide continuous food resources and shelter. ▪ **Maintain Flower-Rich Margins:** Create uncultivated flower-rich margins of at least 5m width, cutting only after flowering in autumn and removing cut material. Flower-rich margins may shift with crop rotation; however, the aim should be to provide the same amount of habitat across the landscape (no more than 500m between patches). ▪ **Scarify Permanent Margins:** permanent margins can benefit from occasional scarification to maintain diversity of flowering plants. ▪ **Sow Spring Oilseed Rape:** Sow Oilseed Rape in the spring to extend its value to foraging pollinators into midsummer. ▪ **Encourage Wildflowers in between Crops and Margins:** Allow wildflowers like mayweeds, dead-nettles, poppies, and pansies to grow within crops for additional food sources and can provide a valuable late summer bloom between harvesting and ploughing.	Unmappable

Large Garden Bumblebee: Warwickshire is designated as the second national stronghold for this species, which thrives on red clover and agricultural field margins.

Necklace Ground Beetle: Although not technically a pollinator, this beetle is included due to the impact from pesticides and its need for good field margins. It has a stronghold in the Midlands and is at risk of going extinct in Britain in the next decade.

- **Use Fodder and Seed Mixes:** Plant fodder crops, wild bird seed, and 'bumblebird' or AB15s and AB1 seed mixes that contain valuable food plants for pollinators; such as legumes, brassicas, borage and fodder radish.
- **Delay Hay-Cutting:** Delay hay-cutting until late summer to extend foraging value and improve seed production or alternatively implement a rotational cutting regime to ensure nectar is still available throughout the season.
- **Leave Uncut Patches:** Leave patches or margins uncut to create refuges for invertebrates and overwintering opportunities.
- **Common Ragwort and Thistles:** Where legally acceptable, allow these plants to grow as they provide important foraging resources for pollinators.
- **Limit Worming Medications:** Reduce the use of worming medications like avermectin to protect invertebrates, including dung beetles which help to maintain healthy soils.

Specific actions for Warwickshire's Rare Bumblebees and Beetles include:

- Create flower-rich habitats with legumes and labiates
- Create field margins with red clover and common birds foot trefoil.
- Connect field margins with well managed hedgerows.

Actions for Community Groups and Individuals:

- **Use Pollinator-Friendly Planters:** Place planters with pollinator-friendly plants in heavily urbanised areas.
- **Promote Wild Grasslands:** Allow areas of grassland to grow wild or create wildflower meadows/ verges.
- **Relax Mowing Regimes:** Implement a relaxed mowing schedule for areas like road verges, mowing after the end of May.
- **Plant Nectar-Rich Flora:** Introduce a variety of nectar-rich flowers, shrubs, and trees.

Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Scarce arable plants Including but not limited too: Blue Pimpernel *(Anagallis arvensis ssp. foemina)* Corn Buttercup *(Ranunculus arvensis)* Corn Gromwell *(Lithospermum arvense)* Corn Marigold *(Chrysanthemum segetum)* Corn Spurrey *(Spergula arvensis)* Dwarf Spurge *(Euphorbia exigua)* Field Woundwort *(Stachys arvensis)* Large Hemp-Nettle *(Galeopsis speciosa)* Narrow-Leaved Hemp-Nettle *(Galeopsis angustifolia)* Night-Flowering Catchfly *(Silene noctiflora)* Prickly Poppy *(Papaver argemone)* Shepherd's Needle *(Scandix pecten-veneris)* Small Flowered Buttercup *(Ranunculus parviflorus)* Spreading Hedge-Parsley *(Torilis arvensis)* Stinking Chamomile *(Anthemis cotula)* Wild Pansy *(Viola tricolor hbrids)* Others Include: Sharp-Leaved Fluellen *(Kicksia elatine)*	Since the mid-twentieth century, arable weeds have experienced the most significant decline among British plants, primarily due to modern farming practices and possibly climate change. Many arable plants grow not only in arable fields but also in small-holdings, roadsides, waste places, allotments, parks, and gardens. However, some specialised species are almost entirely dependent on arable land and have significantly declined or become extinct due to intensive farming and horticulture. These species often reappear after ploughing releases old seedbanks. The best sites for arable weeds tend to have lighter, often calcareous soils. Warwickshire still boasts a moderately diverse range of these plants. Whilst this assemblage is likely to benefit from general habitat improvements to farmland, particularly field margins, bespoke actions are required.	▪ **Create conditions for existing plant populations to flourish,** enabling natural seedbank replenishment and local range expansion. Where necessary, supplement with carefully selected local provenance seed mixes to support habitat restoration and maintain genetic integrity. ▪ **Reduce Herbicide and Fertiliser Use:** Minimise herbicides and fertilisers, and leave untouched field margins by not ploughing up to the base of the field boundary. ▪ **Allow Natural Recolonisation:** At appropriate locations after works (e.g., road works), let bare soil recolonise naturally from the seed bank and avoid topsoiling. ▪ **Implement Good Farming Practices:** Maintain field margins, beetle banks, conservation headlands and adopt minimal tillage systems at appropriate locations. ▪ **Manage Arable Plants as Crops:** Treat arable plants with the same care as commercial crops to create areas with annual flowers, supporting invertebrates, small mammals, and farmland birds. ▪ **Select Appropriate Cultivation Timing:** Choose autumn or spring cultivation to favour target species and fit with cropping regimes. Rotate cultivation around the farm to avoid continuous autumn or spring cropping. This can help control some pernicious weeds, such as autumn germinating grasses and Bristly Oxtongue. ▪ **Ploughing for Arable Plants:** At historic sites, traditional ploughing may be necessary to stimulate the germination of arable plant species, as minimal tillage often fails to sufficiently disturb the soil. This can result in dense grass cover that shades out smaller, less competitive arable plants. It's important to consider the earlier point about adopting minimal tillage systems where appropriate, recognising that different sites may require tailored approaches based on their specific conditions and conservation goals.	Unmappable

Round-Leaved Fluellen *(Kicksia spuria)*

Venus' Looking Glass *(Legousia hybrida)*

Mousetail *(Myosurus minimus)*

Please note this is not a comprehensive list of the sub-region's scarce arable plants.

Falk (2009) provides a checklist of plants strongly associated with local arable land plus a county checklist revealing which ones, additional to the fifteen listed above, are considered scarce at a county level.

- **Cultivate Plots with Care:** Cultivate plots to a fine tilth, providing the best growing medium for arable plants, similar to cereal crop cultivation. Without cultivation, arable plants won't germinate, and weeds like Creeping Thistle can dominate.
- **Rotate Plots:** Rotate plots to manage weed problems and maintain low fertility soils, which are ideal for arable flowers.

Unmappable



Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Urban Nesting Birds Swift (*Apus apus)* House martin (*Delichon urbicum)* Starling (*Sturnus vulgaris)* House sparrow (*Passer domesticus*)	This bird assemblage, while associated with various habitats, will benefit from actions aimed at improving urban nesting sites. Many of these birds migrate from Africa to the UK each summer to breed. They require good foraging habitats, particularly along rivers, which are being enhanced through wider habitat improvements. Swifts and House Martins, found in towns and cities across Warwickshire, present an opportunity for local communities to support urban wildlife. Hotspots for swift 'screaming parties' and nest locations include Nuneaton, Rugby, Warwick, Harbury, Stratford-upon-Avon, Shipston-on-Stour, and Stockton. To support their recovery, providing additional nesting spaces (such as boxes, swift bricks, and spaces in buildings) and retaining existing sites is crucial. Renovation or redevelopment of older buildings can lead to the loss of nesting sites, but new nesting spaces can mitigate this. These efforts also benefit other urban birds like house sparrows and starlings.	▪ **Install Bird Boxes:** Support species by installing homes for wildlife on buildings, such as swift bricks, swift boxes, and house martin nesting cups. ▪ **Identify, monitor, and safeguard nesting sites,** ensuring nests are not disturbed, removed, or restricted. ▪ **Mitigate Redevelopment Impacts:** Where older buildings are being renovated or demolished, incorporate new nesting features into the design of replacement structures. ▪ **Engage Local Communities:** Raise awareness and encourage residents, schools, and businesses to participate in urban bird conservation.	Urban Nesting Birds Action Areas

Assemblages	Assemblage Detail and commentary	Actions needed help the assemblage to recover	Action Areas
Woodland Invertebrates Some key species within this assemblage are listed below but are not exclusive too: Autumn Green Carpet (*Chloroclysta miata)* Cloaked Carpet (*Euphyia biangulata)* False Mocha (*Cyclophora porata)* Mottled Grey (*Colostygia multistrigaria)* White-marked (*Cerastis leucographa)* Oak Lutestring (*Cymatophorina diluta)* Angle-striped (*Sallow Enargia paleacea)* Dark Brocade (*Mniotype adusta)* Wood white Purple emperor White admiral	Some of the species in this assemblage are considered Nationally Scarce in Britain. They will benefit from general habitat improvements but are reliant on specific food plants for survival.	▪ **Ensure a continuous blossom sequence:** Use diverse planting mixes that provide a continuous sequence of flowering from spring through summer, ensuring a consistent food source for invertebrates, including solitary bees ▪ **Include Larval Foodplants:** The food plants of the species in this assemblage should be considered for inclusion/ promotion when designing the habitat (i.e. woodlands) to support these invertebrates in Warwickshire. Foodplants for Each Species: ▪ **Autumn Green Carpet:** Rowan (Sorbus aucuparia) and Sallow (Salix). ▪ **Cloaked Carpet:** Various chickweeds (Stellaria spp.). ▪ **False Mocha:** Oak (Quercus spp.). ▪ **Mottled Grey:** non-invasive Cotoneaster. ▪ **White-marked:** A variety of tree species including Oaks, Black Locust, Hackberry, Hickory, and Willow. ▪ **Oak Lutestring:** Oak (Quercus spp.). ▪ **Angle-striped Sallow:** Birch (Betula spp.) and Aspen. ▪ **Dark Brocade:** A variety of herbaceous and woody plants, including Bog-myrtle, Heather, and Alder.	Woodland Invertebrates Action Areas

Possible Reintroduction/Translocation Species

Species	Species Detail *(specific to Warwickshire – existing problems/ projects etc.)*	Actions needed help the assemblage to recover	Action Areas *(link to mapping)*
Black-veined White *(Aporia crataegi)*	This species was believed to have gone extinct in the UK due to climatic conditions. However, the current weather has become suitable for its return. The last known site of this species prior to its extinction was on the Worcestershire/ Warwickshire border. The Heart of England Forest has since created numerous suitable habitats to support its re-establishment.	▪ The Heart of England Forest has established a diverse range of high-quality habitats, including structurally varied, flower-rich hedgerows and rides. Subject to the availability of appropriate funding and opportunities, Heart of England Forest sites could serve as a strategic location for reintroduction initiatives for this species	Unmappable
European beaver *(Castor fiber)*	There have been infrequent records of beaver in the Tame Valley Wetland NIA since 2023 and suitable sites within Warwickshire may be identified for the release and subsequent reintroduction of beavers. Warwickshire's watercourses are failing and are in overall poor health. Restoring beavers to Warwickshire would greatly improve the ecological, biological and chemical status of rivers due to their dynamic habitat alterations as a Nature-based Solution (NbS). Evidence for this is shown across Europe and in other parts of the UK for up to 40 years. Long term management advice and incentivised management changes will need to be implemented.	▪ Consider (re)introducing beaver into habitats which are identified as suitable ensuring full compliance with current best practice and all necessary licensing and permitting requirements.	Unmappable
White clawed crayfish *(Austropotamobius pallipes)*	The UK is thought to support a quarter of the world's population of White-Clawed Crayfish – the UK's only native crayfish species. It is under threat due to the spread of invasive non-native species which quickly eradicates native crayfish populations. The Species Recovery Programme Fund is currently funding a project for white-clawed crayfish in Warwickshire targeting actions to ensure its survival, including looking at Ark sites for reintroductions.	▪ **Establish ARK sites:** identify suitable locations to relocate native crayfish and build a population in Warwickshire. ▪ **Control INNS:** Take suitable effective actions to exclude American Signal Crayfish if effective techniques emerge.	Unmappable



Part three

Delivering the LNRS

Warwickshire's Local Nature Recovery Strategy (LNRS) is designed to empower and enable everyone and every organisation in Warwickshire to collectively contribute positively and meaningfully to nature's recovery locally and nationally.

Warwickshire have over 25 years of spatial habitat data. This data has been used to track land use and habitat changes across the county. Similarly, it has a strong amateur expert community that supports the Warwickshire Biological Record Centre (WBRC)

As a county, Warwickshire lacks large contiguous areas designated for nature or landscape purposes, such as National Nature Reserves (NNRs), Sites of Special Scientific Interest (SSSIs), National Landscapes, or National Parks. This, among other factors, has led to increasing fragmentation across the county over time, exacerbated by large national infrastructure projects, urban sprawl, new settlements and general development, both residential and commercial. This fragmentation contrasts with other Strategy Areas where extensive land is designated and/ or protected for their ecological or landscape importance.

Warwickshire, however, remains crucial for nature conservation. Centrally located in England, Warwickshire is essential for ecological connectivity at both regional and national levels. This connectivity is crucial for facilitating species and habitat range shifts in response to the changes in climate. Therefore, the Warwickshire LNRS must prioritise enhancing connectivity across the entire landscape to support biodiversity and environmental resilience.

Nationally LNRS's are mandated to spatially target conservation efforts to achieve better localised outcomes for nature over the lifetime of the strategy; envisaged to be eight years. This will be accomplished by focusing actions within targeted areas coupled with Biodiversity Net Gain strategic areas based on scientific modelling and local knowledge. However, given Warwickshire's pivotal position within the country, this should not preclude broader activities across the county. Together these approaches will deliver our Overarching Themes and contribute to the Local Nature Partnership's (LNP) vision.

Targeted Approach

The Warwickshire LNRS will target action in two key ways by focusing recovery efforts in both the Areas of Importance for Biodiversity and Potential Actions for Nature Recovery locations:

Areas of Importance for Biodiversity (APIB)

These are mapped locations where valuable habitat exists. Key actions here will be to conserve, enhance and buffer these existing locations. They will also be used to inform wider land management decisions to create a resilient, ecologically connected landscape.

Potential Actions for Nature Recovery

These include mapped and unmapped areas where specific interventions can help achieve LNRS overarching themes. Actions will be focused on:

Conserve, Enlarge, Enhance and Connect – These are areas of existing habitat of biodiversity value that could be restored or buffered to compliment the APIB sites.

Create – These are priority and opportunity areas for habitat creation (e.g. priority areas for floodplain meadow creation) or interventions (e.g. opportunity areas for installation of leaky barriers or green bridges).

Species Action Areas – mapped locations where specific species actions have been identified

Species Assemblage Action Areas – There are mapped locations where specific species assemblage actions have been identified.

Importantly this does not preclude nature recovery actions from taking place outside the above mapped and unmapped areas, which covers 48% of Warwickshire.

Mapping

The APIB, Potential Actions for Nature Recovery and the Biodiversity Net Gain Strategic Areas that can be mapped are publicly accessible online:

Warwickshire LNRS Maps **[LNRS]**.[1]

The Warwickshire LNP will also look to provide partner focused online mapping with more informative datasets to assist with their decision making on what is best for nature and their own objectives. For example, the Warwickshire Coventry & Solihull Green Infrastructure mapping[2] has maps specific to spatial planners and developers.

1 https://maps.warwickshire.gov.uk/LNRS

2 Green Infrastructure – Warwickshire, Coventry and Solihull

Delivery Mechanisms Overview

The LNRS supports the implementation of a range of nature-recovery delivery mechanisms. These are essential for achieving habitat and species targets and the overall goal of thriving plants and wildlife.

Recognising the varied needs and priorities of different stakeholders, it is imperative that these mechanisms are adaptable and versatile, enabling stakeholders to employ the most suitable approaches or a combination thereof to achieve the desired outcomes.

Some of the key delivery mechanisms are outlined below.

Key Delivery Mechanisms:

Policy and Regulatory Frameworks

Implementing Biodiversity Net Gain (BNG) policies will ensure that new development projects contribute positively to biodiversity. Additionally, exploring opportunities to apply broader Environmental Net Gain (ENG) principles, through the establishment of and other Nature Markets, will consider a wider range of environmental benefits beyond biodiversity through, for example, nature-based solutions. This mechanism will primarily benefit developers and local planning authorities by providing clear guidelines and incentives for incorporating biodiversity enhancements into their projects.

Integrating the Warwickshire LNRS into local planning policies will guide development and ensure that nature recovery is considered at all stages of the planning process, benefiting local authorities and planners by embedding nature recovery into the planning framework.

Financial Mechanisms and Incentives

Recognising the need for financial support, the Warwickshire LNRS and its partners emphasise securing funding from diverse sources, including government initiatives and schemes. Although LNRSs are spatial strategies rather than delivery plans, this Delivery section of the Warwickshire LNRs aims to identify mechanisms that offer the best chance of achieving the strategy's goals.

Securing funding from various sources, including government grants, charitable trusts and private sector investment will support nature recovery projects. This approach will benefit conservation organisations, local authorities, businesses and community groups by providing the necessary financial resources to implement nature recovery initiatives.



Undertaking soil surveys, Warwickshire Wildlife Trust Farm and Wildlife Advice team. Photo by Libby Keysell WWT.

Utilising environmental land management schemes will enable farmers and landowners to adopt nature-friendly practices. These schemes will directly benefit farmers and landowners by offering financial incentives for sustainable land management practices.

Exploring opportunities to participate in emerging regulatory and voluntary nature markets, such as carbon markets and biodiversity net gain, can also generate income for nature recovery projects, benefiting landowners, businesses, and conservation organisations by creating new revenue and capital streams.

Partnership and Collaboration

Effective delivery of the LNRS requires collaboration among various stakeholders, including local authorities, parish councils, Non-Government Organisations, businesses, community groups, and landowners and farmers. Forming or utilising existing relevant partnerships, cooperatives, farm clusters and networks with appropriate structures for collaborative decision-making and continued engagement is crucial. These partnerships can help mitigate conflicts over land use decisions and enable multifunctional land use that supports a collective approach for both nature recovery and economic/social uses.

Parish councils across Warwickshire are being encouraged to prepare Local Nature Action Plans, which are their plans to declare what they will do to help nature's recovery. Each plan will be slightly different, depending on location and resource availability. These plans will directly relate to the LNRS and have shared ambition.

Engaging local businesses to promote biodiversity on their premises, reduce their environmental impact, and support local nature recovery initiatives is essential. This approach will benefit businesses by enhancing their corporate social responsibility and contributing to local conservation efforts.

Working closely with farmers and landowners through existing channels such as the Rural Hub and the Warwickshire Wildlife Trust, farm advisors will help implement sustainable land management practices and create wildlife-friendly habitats. This collaboration will benefit farmers and landowners by continuing to provide expert advice and support for nature-friendly practices.

Encouraging public participation in nature recovery through citizen science, volunteering, and community-led projects will further enhance the strategy's impact, benefiting local communities by fostering a sense of ownership and involvement in nature recovery efforts.



Meadow survey work. Warwickshire Wildlife Trust Farm and Wildlife Advice Team. Photo by Libby Keysell WWT.

Monitoring

Tracking our progress

Tracking our progress is crucial to understand our successes or alter our priorities or approaches if necessary. The Convention on Biological Diversity, draws attention to the need to identify and monitor ecosystems, habitats, species, communities, genomes and genes. However, it is not possible nor practical to monitor all species, communities, and ecosystems. Therefore, there must be some kind of prioritisation and utilise the latest advances in technology to help us. The LNP will provide this direction and will produce a LNRS monitoring framework and report appropriately. The framework will need to be resourced and financed.

Citizen Science

Warwickshire has a strong ecological recording community that will continue to be supported and will enable species and habitat targets to be monitored. This community comprises of amateur experts and is open to all. The public including landowners, through citizen science, contributes most of the species records within the Warwickshire Biological Record Centre and this community spirit will remain a core philosophy of this strategy.

The LNP will continue to encourage and support local, parish and county recording schemes and events that will foster community recording of all wildlife and their habitats and not just those specifically mentioned in this strategy.

Surveillance

The LNRS monitoring framework will include a long-term, systematic survey program. This will enable the collection of ecological data in a standardized manner at regular intervals over time on dedicated sites across the county. It will comprise both traditional and modern survey techniques.

The LNP will continue to work with research establishments and county recording groups to develop and deliver the long-term systematic survey program.

Modelling and Research

The LNP will endeavour to ensure that all data gathered through the LNRS Framework will be open to all and made available to those that wish to research past, present, and future ecological trends

Recording LNRS Activity

The LNRS monitoring framework will also include how everyone can register the actions they have taken to fulfil the LNRS. It will look to promote one or more platforms on to which actions can be recorded and celebrated.

Part four

Glossary



Glossary

Agroforestry	A land-use system that integrates trees and shrubs into farming systems.
Ancient Semi-Natural Woodland (AWNW)	Ancient semi-natural woodland (ASNW) is where the stands are composed predominantly of trees and shrubs native to the site that do not obviously originate from planting. However, woodlands with small planting of trees native to the site would still be included in this category. The stands may have been managed by coppicing or pollarding in the past or the tree and shrub layer may have grown up by natural regeneration.
Arable reversion	The process of converting land previously used for arable (crop) farming back to semi-natural habitats such as grassland, heathland, or woodland. It is often used to restore biodiversity, improve soil health, and support nature recovery efforts.
Areas of Particular Importance for Biodiversity (APIBs)	Within the Warwickshire Local Nature Recovery Strategy (LNRS), these are areas already recognised as being of particular importance for biodiversity. They include sites for nature and irreplaceable habitats that are protected through local, national, or international designations—such as Local Wildlife Sites, Sites of Special Scientific Interest (SSSIs), and ancient woodlands. These areas form a vital foundation for nature recovery across the county.
Areas that Could become of particular importance for Biodiversity (ACBs)	As part of the LNRS process in Warwickshire, we've identified and mapped areas that could become particularly important for biodiversity. These are places where targeted actions for nature recovery are likely to have the greatest impact, helping to restore habitats, support species, and strengthen ecological networks across the county.
Biodiversity	Variety of all living organisms ranging from the genes of an individual to entire ecosystems and biospheres.
Biodiversity net gain	Approach to land development and management that holds developers accountable for contributing to the net gain of biodiversity.
Carbon Market	Market dedicated to the trading of carbon emission allowances to promote fewer carbon dioxide emissions by improving awareness.
Carbon sequestration	Uptake/ storage of carbon e.g. absorption of carbon dioxide in plants through natural processes like photosynthesis.
Climate Change	A pattern of change in response to natural processes or human activity on global and region climates.

Climate Resilience	The ability of a system—such as a community, ecosystem, or economy—to anticipate, prepare for, respond to, and recover from the impacts of climate change. It involves adapting to climate risks while maintaining essential functions and minimising long-term damage.
Ecological resilience	The capacity of an ecosystem to absorb disturbances- such as extreme weather, pollution, or human activity- while maintaining its essential structure, functions, and processes. A resilient ecosystem can recover from disturbance events and continue to support biodiversity and ecosystem services.
Ecosystem services	Direct and indirect ways that humans benefit from the natural environment.
Green infrastructure	Integration of innovative multi-functioning greenspaces within a community whether that be rural or urban. For example, community gardens.
Habitat Biodiversity Audit (HBA)	Now known as the Natural Capital Assessment Partnership (NCAP). Please see below.
Habitat Fragmentation	The process by which large, continuous habitats are broken into smaller, isolated patches, often due to human activities like agriculture, urban development, or road construction. It reduces biodiversity, disrupts wildlife movement, and weakens ecosystem resilience.
Husbandry	The practice of farming, including cultivation of soil, raising livestock, and other agricultural practices.
Intensive farming	A type of agriculture that involves intensive use of inputs, such as fertilisers, pesticides, and machinery, to maximize output.
Natural Capital	Economic metaphor of liking the value of living and non-living aspects of ecosystems to that of stock.
Natural Capital Assessment Partnership (NCAP)	Established in 1995 and formerly known as the Habitat Biodiversity Audit (HBA), the Natural Capital Assessment Partnership (NCAP) has collected and collated over 25 years of habitat data. With its primary remit being habitat mapping and conservation, NCAP data covers the vast majority of Warwickshire. It offers comprehensive and continuously updated habitat data through 'Phase 1 surveying', which is crucial for tracking habitat changes, identifying connectivity opportunities, and supporting wildlife movement. Additionally, NCAP manages Local Wildlife Sites (LWS).

Natural capital assets	All the environmental factors and natural resources e.g. rain, sun, biodiversity that is needed to provide marketable goods or environmental benefits.
Natural capital depletion	Increase of capital gain and standards of living at the expense of natural capital.
Natural capital investment	The allocation of financial resources into the protection, restoration, or sustainable management of natural assets—such as forests, wetlands, rivers, soils, and biodiversity—with the goal of generating both environmental and economic returns.
Natural capital stocks and flows	Flows of services from stocks of natural capital that overtime provide marketable goods, or positive interactions between an individual and their ecosystem (from water purification to recreational benefits).
Nature Based Solutions	Using nature as a technique to help solve environmental issues
Nature Markets	Private investment into nature by funding ecological services for example restoration projects.
Nature Rich	A setting, whether urban or rural, characterised by a high density and diversity of biological life and natural features.
Net Zero	Equal balance between carbon dioxide emissions and mitigation, so there is no overall net gain or loss.
Non-Government Organisations (NGOs)	Independent entities that operate separately from government control. They are typically non-profit organisations focused on addressing social, environmental, cultural, or humanitarian issues. NGOs can work locally, nationally, or internationally, and they often rely on donations, grants, and volunteers to carry out their missions.
Nutrient cycling	The natural process by which essential nutrients (like nitrogen, phosphorus, and carbon) are transferred between living organisms and the environment, supporting ecosystem health and productivity.
Open Mosaic Habitat	A unique type of habitat predominantly found on brownfield sites, consisting of a complex mix of unvegetated or sparsely vegetated surfaces interspersed with more densely vegetated areas. This creates a dynamic 'mosaic' of habitats that can support a diverse range of species. Open Mosaic Habitats (OMH) are recognised for their high ecological value.
Pictorial Meadows	A type of designed flower meadow that focuses on creating a visually striking, colourful display rather than replicating a traditional wildflower meadow. It typically consists of a carefully selected mix of annual and perennial flowering plants chosen for their vibrant colours, long blooming periods, and aesthetic appeal.

Planetary boundaries	A scientific framework outlining nine environmental limits within which humanity can safely operate. Breaching these boundaries (e.g., climate change, biodiversity loss) risks destabilising Earth's systems.
Plantation on Ancient Woodland Sites (PAWS)	Plantations on ancient woodland sites (PAWS, also known as ancient, replanted woodland). These are areas of ancient woodland where the former native tree cover has been felled and replaced by planted trees, predominantly of species not native to the site. These will include conifers such as Norway spruce or Corsican pine, and also non-native broadleaves such as sweet chestnut. These sites often retain some ancient woodland features such as soils, ground flora, fungi, and woodland archaeology — and they can respond well to restoration management.
Range Shifts	The movement of species and habitats in response to climate change, involving shifts to higher latitudes or elevations to maintain suitable climate conditions.
Responsible Authority	The designated public body appointed by the Secretary of State for Environment, Food and Rural Affairs to lead the preparation, publication, and maintenance of a Local Nature Recovery Strategy (LNRS) within a defined area in England. This authority is typically a local authority, combined authority, or the Mayor of London, depending on the region. The responsible authority is tasked with coordinating stakeholders, gathering evidence, and developing strategic plans to enhance biodiversity and support nature recovery at the local level.
Ridge and Furrow	An ancient ploughing technique for cultivating arable land, depicting the raised earth banks and intervening depressions that result from prolonged ploughing activities.
Scheduled Monument	A nationally important archaeological site or historic building that has been given legal protection by the government. In the UK, this designation is made under the Ancient Monuments and Archaeological Areas Act 1979.
Silage	A fodder crop (such as grass or clover) preserved in airtight conditions, typically in a silo.
Social Accountability	The mechanisms through which the public and civil society organisations hold authorities and other responsible parties accountable for their actions. This is achieved through participation, engagement, and collective mobilisation.[1]

[1] *Natural England (2025) Social accountability for place-based nature recovery (NECR585) [https://publications.naturalengland.org.uk/publication/4568060193931264*

Spring topping	A land management practice typically used in grassland, heathland, or conservation areas to control the growth of certain plants – especially coarse grasses, bracken, or early-flowering species—without completely removing vegetation. It helps maintain open habitats for ground-nesting birds, pollinators, and a variety of invertebrates by promoting plant diversity.
Stocking density	The number of animals kept per unit area of land, typically expressed as animals per hectare. It influences grazing pressure, pasture health, and animal welfare, and is a key factor in sustainable land management.
Strategic Area	The defined geographic boundary within which a Local Nature Recovery Strategy (LNRS) is developed. Each strategic area is assigned a responsible authority and is designed to ensure full national coverage without overlaps or gaps. It serves as the spatial framework for identifying local biodiversity priorities, mapping valuable habitats, and planning targeted actions to support nature recovery.
Supporting Authority	A public body that must be involved in the preparation of a LNRS, though it is not the lead organisation. This includes Local Planning Authorities (LPAs), Environment Agency, Forestry Commission, and Natural England. Supporting authorities are required to collaborate with the responsible authority to help shape the strategy, ensure it aligns with local priorities, and contribute relevant data, expertise, and feedback throughout the process.
Sustainable development goals (SDGs)	A set of 17 global goals adopted by the United Nations to end poverty, protect the planet, and ensure peace and prosperity for all by 2030. They cover areas such as health, education, climate action, and economic growth.
Sustainable Urban Drainage Systems (SUDS)	A set of water management practices designed to mimic natural drainage processes in urban areas. SuDS help manage surface water runoff, reduce flood risk, improve water quality, and enhance biodiversity by using features like permeable surfaces, swales, green roofs, and wetlands.
Vegetative succession	The process of gradual change in plant and animal communities in an area over time.
Wetland	An area of land where water covers the soil or is present near the surface for part or all of the year.

Acronyms

ACB	Areas that Could become of particular importance for Biodiversity
APIB	Areas of Particular Importance for Biodiversity
ASNW	Ancient semi-natural woodland
EIP	Environmental Improvement Plan
HBA	Habitat Biodiversity Audit
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategy
NCAP	Natural Capital Assessment Partnership
NCAs	National Character Areas
NGOs	Non-Government Organisations
NIA	Nature Improvement Area
OMH	Open Mosaic Habitat
PAWS	Plantation on Ancient Woodland Site
RA	Responsible Authority
SAC	Special Area of Conservation
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage Systems

Appendix A

Governance and Structure
LNP Chair

Warwickshire County Council is the principal owner of the Warwickshire LNRS having been appointed by the Sectary of State to oversee its preparation. The County may review or republish the Warwickshire LNRS although the SoS may also, by regulations, make provision about the procedure to be followed in any review and republication. The County with District and Borough Councils of Warwickshire have adopted the Warwickshire LNRS as one of their core strategies. The County, Borough and District authorities have asked the Warwickshire, Coventry & Solihull Local Nature Partnership (WCS LNP) to be the lead delivery organisation to promote and enact the strategy.

Warwickshire Coventry & Solihull Local Nature Partnership

The WCS LNP was established in 2012 following the Government commitment within the Natural Environment White Paper to strengthen local action for nature. As defined by Defra, the LNP's purposes are to:

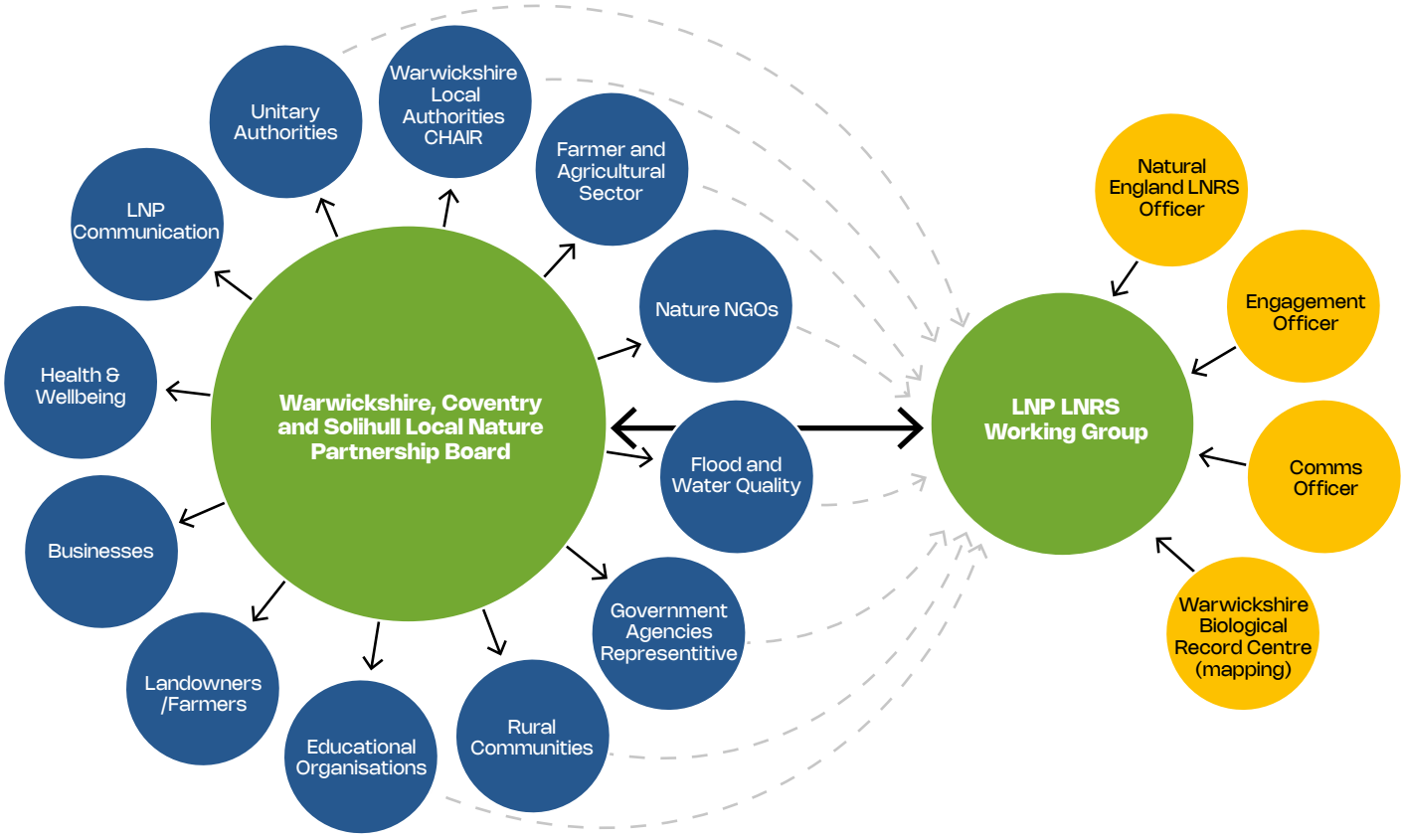
- Drive positive change in the local natural environment, taking a strategic view of the challenges and opportunities involved and identifying ways to manage it as a system for the benefit of nature, people and the economy.
- Contribute to achieving the Government's national environmental objectives locally, including the identification of local ecological networks, alongside addressing local priorities.
- Become local champions influencing decision-making relating to the natural environment and its value to social and economic outcomes.

The WCS LNP vision is to create a region where

"The natural, historic, urban, and farmed environments are in a vibrant condition that enables the economy, nature and people to thrive. A place where everyone is empowered to reverse wildlife losses and create beneficial connections with nature and where nature can flourish in a stable climate."

The WCS LNP board comprises of single representatives from key sectors of the community. These include Unitary Authorities, County/District/Borough Authorities, Health, Landowners, Farming, Community, Education, Business and Government Agencies, Environmental non-Government Agencies. Amongst other duties, the role of a representative is to act as an ambassador for nature and oversee mechanisms to deliver the Warwickshire LNRS objectives and actions that fall within their influence.

Figure 2 : *Membership sectors of the Warwickshire Local Nature Partnership and that of the LNRS Working Group during the formation of the Warwickshire LNRS (2023-April 2026).*





Appendix B

2026

Local Nature Recovery Strategy User Guidance

Nuneaton & Bedworth

United to Achieve

Planning Policy

Nuneaton and Bedworth Borough Council

01/10/2026

Local Nature Recovery Strategy Guidance Document

A document written to guide applicants and others through the process of what the Local Nature Recovery Strategy document is, why it was produced and how it is intended to be used. Covering detailed legislative context, mapping guidance and Biodiversity Net Gain advice.

Planning Policy

Version 1

Date 01/10/2026

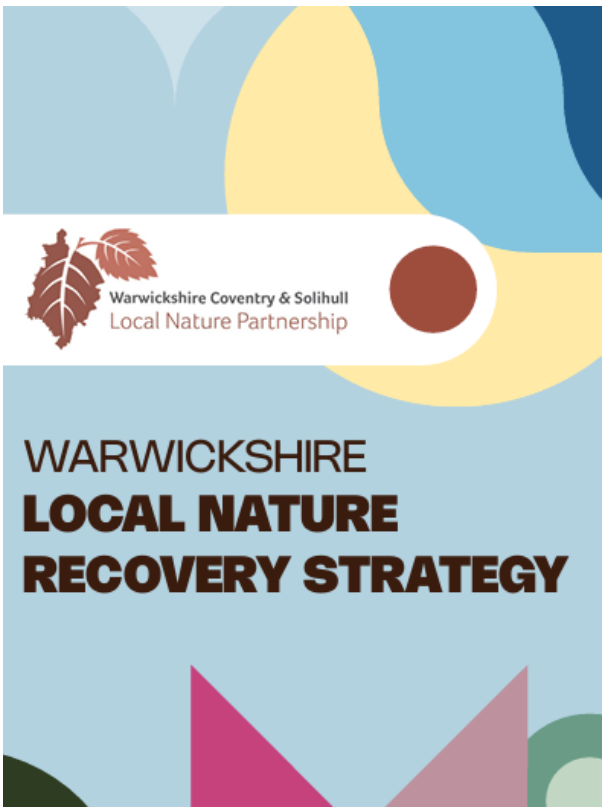
Contents

Page	Description
Page 3	Local Nature Recovery Strategy Background
Page 4	What is a Local Nature Recovery Strategy
Page 5	How to use the LNRS
Page 6	Warwickshire's LNRS
Page 7	Legislative context
Page 9	Mapping
Page 10	Biodiversity Net Gain
Page 11	Other Resources

1.0 Local Nature Recovery Strategy Background

All local authorities have a duty to 'have regard' to the Local Nature Recovery Strategy.[1]

The Local Nature Recovery Strategy (LNRS) has been instructed by the Government under the Environment Act 2021, as part of their ambition to reverse the decline of biodiversity.



A total of 48 Local Nature Recovery Strategies are currently being developed across England, with the purpose of creating a strategic, shared vision for where and how to best help nature recover.

In Warwickshire, the LNRS has been developed by Warwickshire County Council who were appointed as a Responsible Authority under section 105 of the Environment Act 2021 with a duty to prepare and publish a LNRS. They are supported by the Warwickshire Coventry and Solihull Local Nature Partnership in promoting and enacting the strategy.

The document can be viewed here: https://www.wcslnp.co.uk/lnrs

[1] Planning Practice Guidance

1.1 What is a Local Nature Recovery Strategy?

The new National Planning Policy Framework (August 2026) defines them as ‘A system of spatial strategies for nature and environmental improvement required by law under s.104 of the Environment Act 2021’.

In summary, a LNRS is a map, or series of mapped data and an accompanying report setting out what is planned, where and why. The main purpose of an LNRS is to identify locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment.

The Warwickshire LNRS will:

- Identify locations and activities that will have the biggest impact to improve nature recovery over this first period of the LNRS, which is envisaged to be 8 years.
- Be used by local authorities when developing planning strategies and to inform decision making.
- Be used to incentivise locations for habitat creation within Biodiversity Net Gain implementation.

The overall strategy and actions in the LNRS will be a material consideration when making decisions on relevant planning applications and will influence plan making. It may also be used to influence decisions made by the Council in respect of the management of Council owned land.



(Source: Warwickshire LNRS)

1.2 How to use the LNRS

Planners and Developers should use the LNRS to identify where nature recovery efforts should be prioritised within Local Plans. As well as to ensure that planning decisions and processes support local biodiversity goals and contribute to the broader Nature Recovery Network. The LNRS will also guide developers when choosing the location of off-site Biodiversity Net Gain (BNG) units.

Role in Plan Making

“Have Regard To” the LNRS:

Local Nature Recovery Strategies are intended to support local planning authorities in preparing Local Plans that conserve and enhance biodiversity and the natural environment, and Local Planning Authorities have a legal duty to ‘have regard’ to the relevant strategy for their area. Local planning authorities should consider the priorities set out in the relevant Local Nature Recovery Strategy when determining how their Local Plan should contribute to and enhance the local and natural environment.

Safeguarding Areas

National Planning Policy Framework (2026) Policy N1 states that ‘Development plans should safeguard and enhance the natural environment and reflect the wider benefits from natural capital and ecosystem services, by using Local Nature Recovery Strategies, Protected Landscape Management Plans…to.

c) Steer the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework…Areas which could become of particular importance for nature identified in Local Nature Recovery Strategies should be taken into account as opportunities to integrate development with environmental restoration…’

1.2 Warwickshire's LNRS

The document is split into 6 sections:

Introduction to the LNRS, LNRS Themes & Priorities, LNRS Delivery & Monitoring, LNRS Glossary, Warwickshire LNRS Map and LNRS Guidance.

1- The first section sets out the Introduction to the Local Nature Recovery Strategy which includes a Strategy Area Description and details the different Geology, Landscape, Habitats, Species, Water, Farming and the Wider Ecological Connections beyond.

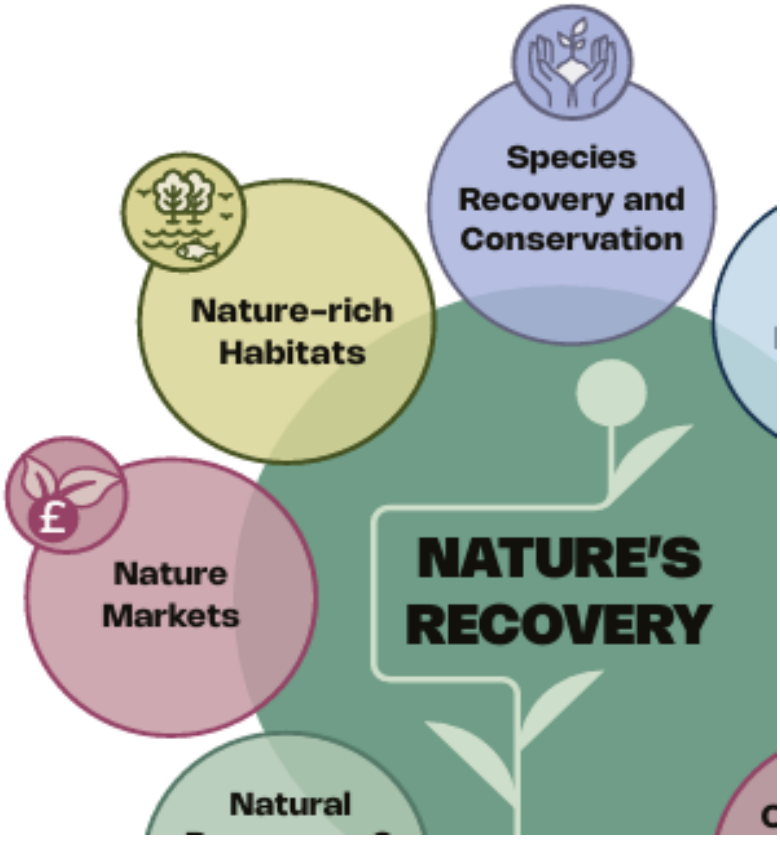
2- Section two sets out the LNRS themes and priorities, Environmental Improvement Plan (EIP) goals, Habitat Priorities and Actions, Species Priorities List and Species Priorities.

3- Section 3 sets out the LNRS Delivery & Monitoring, including a Targeted Approach, Delivery Mechanisms, Overview and Monitoring.

4- Section 4 is a list of terminology set out in a Glossary & Acronyms.

5- Warwickshire LNRS Map.

6- Local Nature Recovery Strategy supporting Guidance.



Warwickshire LNRS's Overarching Themes

2.0 Legislative context

Producing a Local Nature Recovery Strategy (LNRS) is a requirement of Section 104 of the Environment Act 2021, so the Warwickshire LNRS has been produced in line with Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023.

The Local Nature Recovery Strategy has now received approval for publication from all of Warwickshire's District Councils, the County Council, and Natural England.

Local Plan

Policy NE3 (Ecology, Biodiversity, Geodiversity and Local Nature Recovery) of the Borough Plan Review (2025) was prepared in consultation with Warwickshire County Council. The Policy requires development proposals to have regard to the Warwickshire LNRS and its priority habitats and species and any Areas of Particular Importance for biodiversity or opportunity areas.

National Planning Policy Framework

The new National Planning Policy Framework (August 2026) states:

National decision-making policy

N2: Improving the natural environment:

c. Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies..

Paragraph 19. Conserving and enhancing the natural environment

N1: Identifying environmental opportunities and safeguards

1. Development plans should safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by using Local Nature Recovery Strategies..

CC1: 1. Development plans should take a proactive approach…by:

d. Identifying opportunities for green infrastructure provision and nature-based solutions which can safeguard and improve carbon storage, support nature recovery and resilience, and which take account of Local Nature Recovery Strategies in accordance with policy N1.

HO4: Land for strategic site development

1. The development plan should…identify suitable locations for strategic sites for housing-led development…These locations should:

c. Address strategic environmental opportunities and safeguards, including those set out in Local Nature Recovery Strategies.



(Source: Warwickshire LNRS)

3.0 Mapping

The LNRS map is an Opportunity Map. The inclusion of land in the LNRS is not a statutory designation. It is an opportunity map intended to guide investment and action.

When interpreting the mapping note the following:

• Mapping indicates areas where the potential measures could be delivered. In some incidences, these are wide ranging areas, in others they are specific areas depending on the mapping capability. The mapped areas are indicative.

• The desk-based approach means the mapping is theoretical and not based on actual known site condition. Site assessments, and other permissions and prerequisites, will determine the action to that location.

• Sites of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas, Ramsar sites and National Nature Reserves are statutory national and international designations. The mapped potential measures do not override or replace existing management associated with the designation nor do they negate the need for any requisite consents or approvals.

• The Strategy and associated maps do not determine actions or implementation, they are a guide for how landowners and managers could use or manage the land, or approach their operations, in a way that could support the recovery of nature.

• Although mapping indicates where this action may be most needed or result in the greatest gains, the introduction of this action can be applied outside of the target area. Nature recovery action does not need to be limited to the areas that could become of particular importance to biodiversity.

4.0 Biodiversity Net Gain

The LNRS provides a spatial strategy for nature recovery, helping developers to identify where their BNG provision will be most impactful and beneficial to the Nature Recovery Network, through a financial incentive.

BNG requires developers to provide a 10% net gain for biodiversity. This can be achieved by delivering habitat onsite or buying off-site biodiversity units. LNRSs and BNG policies work together to support nature recovery and create joined-up outcomes for the wider environment.



(Source: Warwickshire LNRS)

5.0 Other resources

Further resources are listed below:

- Visit the government website for more information about BNG: Biodiversity net gain - GOV.UK Biodiversity net gain: guidance for developers, land managers and authorities - GOV.UK
- More information about key issues in implementing policy to protect and enhance the natural environment can be found here: https://www.gov.uk/government/collections/biodiversity-net-gain-guidance-for-developers-land-managers-and-authorities
- The Environment Act 2021: Environment Act 2021Environment Act 2021
- The Planning Practice Guidance includes a section on LNRS
- See the frequently asked questions about Local Nature Recovery Strategies on the Planning Advisory Service website Planning for Nature | Local Government Association
- The Biodiversity Metric User Guide identifies how to use the LNRS to assign strategic significance in Biodiversity Net Gain calculations.

Warwickshire County Council ecologists will also be able to provide further advice

This document has been published by Nuneaton and Bedworth Borough Council

Planning Policy

planning.policy@nuneatonandbedworth.gov.uk

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 8

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	4 November 2026
Subject:	Infrastructure Funding Statement
Portfolio:	Planning, Enforcement and Public Services
Responsible Officer:	Assistant Director - Planning
Corporate Plan – Theme:	Place and Prosperity, Housing, Health and Communities and Green Spaces and Environment.

Corporate Plan – Aim:

- Continue to promote and enable events across the Borough.
- Deliver the construction and opening of the Bedworth Physical Activity Hub (BPAH) 2026.
- Promote active travel across the Borough.
- Regenerate Nuneaton Town Centre; Completing the Transforming Nuneaton Programme.
- Facilitate warm, safe, sustainable and affordable housing.
- Work with Public Health colleagues and partners to address community inequalities.
- Promote and develop play area facilities in line with the Parks and Green Space Strategy.

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Ward Relevance:	All
Public or Private:	Public
Amendment to Budget:	No Council Tax Related: No

Recommendation to Full Council: No

Forward Plan: Yes

Subject to Call-in: Yes

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1. Purpose of report

1.1. The purpose of this report is to seek approval to publish the 2025/26 Infrastructure Funding Statement (IFS).

2. Recommendations

2.1. That Cabinet approve the Infrastructure Funding Statement 2025/26 and its publication on the website, in line with statutory requirements set out in the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019.

2.2. That Cabinet note the monies received, held and spent from Section 106 Agreements in the financial year 2025/26.

2.3. That delegated authority be given to the Assistant Director for Planning, in consultation with the Portfolio Holder for Planning, Enforcement and Public Services, to make any minor changes to the document prior to publication.

3. Background

3.1. The Community Infrastructure Levy Regulations 2010 (as amended) require a contribution receiving authority to publish an IFS by no later than 31st December in each calendar year. Nuneaton and Bedworth Borough Council is a contribution receiving authority and, therefore, must publish an IFS before the end of this year (2026).

3.2. The IFS sets out a summary of all developer contributions relating to Section 106 planning obligations (S106 agreements) collected and managed within the Borough within the reported year, which for this reporting year is the period between 1st April 2025 and 31st March 2026.

3.3. The IFS is also required to report on Community Infrastructure Levy (CIL) monies collected. The Borough does not have CIL in place and therefore there is nothing to report on CIL in this IFS.

4. Body of report and reason for recommendations

4.1. That the 2025/26 IFS be noted and published.

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

5.1. Finance and Planning Development Control Officers.

6. Financial Implications

6.1. None directly attributable to the IFS.

7. Legal Implications

7.1. Local authorities are required to publish an IFS no later than 31st December of the reporting year. This is a mandatory requirement set out within the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019).

7.2. The proposed Infrastructure Funding Statement will need to be approved by Cabinet.

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. Environmental implications

10.1. No direct 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 HR 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	That the 2025/26 Infrastructure Funding Statement (IFS) is not approved or published	Rejected- The Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019 require a contribution receiving authority to publish an IFS.

17. Conclusion

17.1. That the 2025/26 Infrastructure Funding Statement (IFS) be approved, noted and published.

18. Appendices

18.1. Please note the following appendices:

i. Appendix A – Infrastructure Funding Statement 2025/26

19. Background papers

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

20. Report Writer Details:

Officer Job Title: Planning Policy Manger

Officer Name: Sarah Matile

Appendix A

Infrastructure Funding Statement 2025-26

Nuneaton & Bedworth
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Nuneaton and Bedworth
Borough Council

Table of Contents

1.0 Introduction 1
2.0 Developer Contributions 1
Section 106 Planning Obligations 1
Community Infrastructure Levy (CIL) 1
3.0 Section 106 planning obligations 3
Monies set out in Section 106 obligations 3
Non-Monetary Requirement in Section 106 obligations 5
Monies Received from Section 106 obligations 6
4.0 Conclusion 18

1.0 Introduction

1.1 The Infrastructure Funding Statement (IFS) is an annual report published by Nuneaton and Bedworth Borough Council which provides a summary of all developer contributions relating to Section 106 planning obligations (S106 agreements) collected and managed within the Borough between 1st April 2025 and 31st March 2026. An Infrastructure Funding Statement must also report on Community Infrastructure Levy (CIL) monies collected. However, the Borough does not have CIL in place and, thus, is not reported.

2.0 Developer Contributions

Section 106 Planning Obligations

2.1 Planning obligations (S106 agreements) are legal agreements which can be attached to a planning permission to mitigate the impact of development and can either be provided on-site or off-site. Planning obligations can only be sought where they are directly related to the development, fairly and reasonably related in scale and kind to the development, and necessary to make the development acceptable in planning terms. The Council's requirements for planning obligations are set out in the Council's adopted Borough Plan. The Borough Plan is supported by an Infrastructure Delivery Plan (IDP) that identifies specific projects which are needed in the Borough to help deliver the development set out in the Borough Plan. Monies received through S106 agreements are ringfenced to go towards those projects set out in the IDP.

Community Infrastructure Levy (CIL)

2.2 Unlike planning obligations CIL is intended to fund strategic infrastructure requirements within the Borough to support new development. CIL can be used to fund the provision, improvement, replacement, operation, or maintenance of infrastructure of the area. CIL rates must be set out via a published charging schedule. During 2020/21 the Council progressed a draft charging schedule and consulted on the draft between 9th October 2020 and 9th November 2020 with the intent to adopt it by September 2021. However,

following the consultation further testing and analysis was undertaken to provide a more thorough assessment of CIL implementation compared to existing S106 agreements. The outcome of this assessment was that CIL would be likely to generate more funding towards infrastructure for minor residential developments (1-9 dwellings) and most likely non-strategic developments (10-169 dwellings), but S106 agreements were considered to generate significantly more funding for strategic scale developments of over 170 dwellings. This, together with the administrative burdens and costs associated with CIL implementation means that CIL was considered not to be beneficial compared to the existing S106 arrangements. Therefore, at the Cabinet meeting of 26th May 2021 it was resolved that the Nuneaton and Bedworth Borough Community Infrastructure Levy Charging Schedule would not be submitted to the Secretary of State for independent examination.

3.0 Section 106 planning obligations

Monies set out in Section 106 obligations

3.1 Table 1 below sets out the monies that have been set out in Section 106 planning obligations (S106) between Nuneaton and Bedworth Borough Council and developers that were signed between 1st April 2025 and 31st March 2026. The table is arranged firstly by the date of the agreement (oldest first). Receipt of the monies within planning obligations is triggered either by specific dates set out in the obligation or by activities taking place on the site to which the obligation relates, such as housing completions, and so there can be considerable time lag between signing of the obligation and receipt of the monies. Tables 3, 4, 5, and 6 later in this document present details on the monies received and spent in 2025/26 including where monies have been transferred to others to utilise (Table 6).

Table 1 S106 contributions monies set out in signed planning obligations signed between 1st April 2025 and 31st March 2026.

Agreement Date	Site	Contributions Sum (£)	Contribution Sum Use
24/07/2025	Land at Hall Farm Church Lane	44,250.00	Biodiversity Monitoring Fee
		360,380.81	BNG contribution or Residual BNG Contribution
		11,500.00	Bus Stop RTI Display Maintenance Contribution
		65,000.00	Bus Stop RTI Display Replacement Contribution
		120,000.00	Public Transport Contribution
		537,110.00	Motorway Junction Improvement Contribution
		1,539,789.00	Road Improvement Contribution
		13,000.00	Traffic Regulation Order Contribution
		8,100.00	Legal Fees NBBC
		8,000.00	Legal Fees WCC
		1,650.00	Monitoring Fee WCC
29/07/2025	Vicarage Street	44,250.00	Biodiversity Monitoring Fee
		3,350.00	Monitoring Fee
		1,500.00	Monitoring Fee
		2,850.00	Monitoring Fee

Agreement Date	Site	Contributions Sum (£)	Contribution Sum Use
		1,000.00	Monitoring Fee
30/07/2025	Land at site 97d006 Weston Lane Bulkington, Bedworth, Warwickshire	37,900	Footway and Cycleway Improvements
		657	Libraries Contribution
		4,359.48	Parks and Open Space Initial Contribution
		55,791.85	Parks and Open Space Contribution
		1,221.33	Public Rights of Way Contribution
		£50 per Dwelling up to a maximum of £1,500	Road Safety Contribution
		6,000.00	TRO Contribution
		3,000.00	Sports Recreation and Community Initial Contribution
		66,226.00	Sports Recreation and Community Contribution
		£440.49 Per Dwelling p to a maximum of thirty Dwellings of £13,211.00	Bulkington Village Centre Contribution
		45,474.00	Early Years Contribution
		2,500.00	Monitoring fee County Council
		750.00	Monitoring fee County Council
		2,270.00	Monitoring fee
		1,475.00	Monitoring fee
02/02/2026	Nuneaton Old Edwardians Rugby Football Club	12,146.00	BNG Monitoring Fee
		1,475.00	Monitoring Fee
03/11/2025	New Inn Rugby Road Bulkington Bedworth CV12 9JF	498.00	Libraries Contribution
		85,504.08	Open Space Contribution
		1,450.00	Road Safety Contribution
		90,420.00	Sports and Development Contribution
		1,475.00	Monitoring Fee
		1,100.00	WCC Monitoring Fees
		550.00	WCC Legal Fees
25/03/2026	Land north of Bermuda Road, Nuneaton, Warwickshire	1,495.00	Monitoring Fee NBBC
		£350 + (5 hours x £40 officer time x Number of triggers)	WCC Monitoring and administration fee
		9,557.00	Recreation and Leisure Facilities Contribution
		82,134.00	Bus Services Contribution
		474.00	Library Contribution
		2,110.00	Road Safety Contribution

Non-Monetary Requirement in Section 106 obligations

3.2 Table 2 below sets out the non-monetary contributions that have been set out in Section 106 planning obligations between Nuneaton and Bedworth Borough Council and developers that were signed between 1st April 2025 and 31st March 2026. The table is arranged firstly by the date of the agreement (oldest first) and then alphabetically by the contribution use. The affordable housing contributions do not routinely require any monetary contributions, hence why they are not in Table 1.

Table 2: S106 contributions non-monetary requirements set out in signed planning obligations signed between 1st April 2025 and 31st March 2026.

Agreement Date	Site	Contribution Sum Use
24/07/2025	Land at Hall Farm Church Lane	Biodiversity Mitigation
		Biodiversity Mitigation
		Biodiversity Mitigation
		Biodiversity Mitigation
		Biodiversity Mitigation
		Connectivity From Bowling Green Lane site access to Adjacent Land
		Connectivity From Bowling Green Lane site access to Adjacent Land
29/07/2025	Vicarage Street	Provision of Affordable Housing
		Provision of Affordable Housing
		Provision of Affordable Housing
		Provision of Affordable Housing
		Provision of Affordable Housing
		Provision of Affordable Housing
		Provision of Affordable Housing
		Provision of Affordable Housing
		Biodiversity Offsetting
		Biodiversity Offsetting
		Biodiversity Offsetting
		Biodiversity Offsetting
		Public Open Space
		Public Open Space
		Public Open Space
		Public Open Space
		Public Open Space
30/07/2025	Land at site 97d006 Weston Lane Bulkington, Bedworth, Warwickshire	Biodiversity Net Gain
		Affordable Housing Units
		Affordable Housing Units
		Affordable Housing Units
		Affordable Housing Units

Agreement Date	Site	Contribution Sum Use
03/11/2025	New Inn Rugby Road Bulkington Bedworth CV12 9JF	Affordable Housing
		Affordable Housing Units
		Affordable Housing Scheme
		Biodiversity Net Gain

Monies Received from Section 106 obligations

3.3 Table 3 below sets out the monies that have been received between 1st April 2025 and 31st March 2026 from Section 106 planning obligations signed by Nuneaton and Bedworth Borough Council and developers. The table is arranged alphabetically by contribution use. Please note that the table is reporting on the total monies received in the year 25/26 rather than on the monies received from those obligations signed in 25/26. All the monies in Table 3 have been allocated to a specific use, that is, none remain unallocated by the Authority. The details of what these monies have been allocated to is contained within Tables 5 and 6 below.

Table 3:Total amount of S106 contributions monies received between 1st April 2025 and 31st March 2026 from signed planning obligations.

Contribution Use	Monies Received (£)
Community Centres	94,272.71
Cycleway Contributions	812,335.42
Ecology & Biodiversity	416,437.93
Healthcare Provision	2,051,550.00
Open Space	494,849.90
Police Infrastructure	53,264.78
Road Safety	2,870.00
Sport & Community Recreation	1,011,255.63
Waste Collection	6,625.66
Total	4,943,462.03

3.4 Table 4 below sets out the monies that have been received between 1st April 2025 and 31st March 2026 from Section 106 planning obligations signed by Nuneaton and Bedworth Borough Council and developers that have been allocated but not spent. The table is arranged alphabetically by contribution use. So, Table 4 shows how much of the monies received in 2025/26 in Table 3 above have been designated to a specific project but have not been spent. Table 5 then shows what the unspent monies have been allocated to and Table 6 where that money received in 25/26 has been spent and on what.

Table 4: Total amount of S106 contributions monies received between 1st April 2025 and 31st March 2026 from signed planning obligations which have been allocated but not spent.

Contribution Use	Monies Allocated (£)
Community Centre	43,661.15
Cycle Path	807,164.13
Ecology & Biodiversity	416,437.93
Grounds Maintenance	106,721.14
Open Space	388,128.76
Sport & Community Recreation	993,370.63
Waste Collection	6,625.66
Total	2,762,109.40

3.5 Table 5 below sets out the monies that have been received between 1st April 2025 and 31st March 2026 from Section 106 planning obligations signed by Nuneaton and Bedworth Borough Council and developers that have been allocated but not spent and the infrastructure it has been allocated to. The table is arranged alphabetically by contribution use and then by monies allocated (smallest first). Sub totals are provided throughout the table showing the total monies allocated for each contribution use. Dependent on the age of the Section 106 planning obligation the Council has between 5 and 10 years from receipt of the monies within which to spend them.

Table 5: Total amount of S106 Contributions Monies received between 1st April 2025 and 31st March 2026 from signed planning obligations which have been allocated but not spent and the items of infrastructure it has been allocated to.

Contribution Use	Site	Monies Allocated (£)
Allotments	Barnacle Lane - Increase capacity	3,403.42
Allotments	Bowling Green Lane -Increased capacity and facilities	7,439.19
Allotments	Higham Lane - Increase capacity	11,980.10
Sub Total		22,822.71
Community Centre	Bulkington Community Centre	43,661.15
Sub Total		43,661.15
Ecology & Biodiversity	Biodiversity off-setting - Bulkington	416,437.93
Sub Total		416,437.93
Grounds Maintenance	Grounds Maintenance*	106,721.14
Sub Total		106,721.14
Open Space	Bulkington Recreation Ground/Barnacle Lane- Play, paths and landscaping	5,743.66
Open Space	Sandon Park - Changing facility capacity	6,705.94
Open Space	Cycleway Bridge over Change Brook	18,812.27
Open Space	Miners Welfare Park - path links, green gym and access improvements	20,371.97
Open Space	Rectory Drive Play Area - Additional play equipment	43,076.85
Open Space	Bulkington Recreation Ground/Barnacle Lane/Brewer Road - Play, paths and landscaping	47,862.13
Open Space	Riversley Park - Visitor facility improvements	76,049.89
Open Space	Sidings Pool - Play, paths and landscaping	80,789.05
Open Space	Miners Welfare Park - Access improvements, play provision and event facilities	84,706.56
Open Space	Cycleway - (Blacktrack) The Shuntings	793,523.15
Sub Total		1,177,641.47

Contribution Use	Site	Monies Allocated (£)
Sport & Community Recreation	Design & Development Bedworth HUB	384,832.04
Sport & Community Recreation	Design and Development - new leisure centres Nuneaton	608,538.59
Sub Total		993,370.63
Waste Contribution	The provision of bins to site off Leyland Road, Bedworth	6,625.66
Sub Total		6,625.66
Total		2,767,280.69

*Grounds maintenance contribution is apportioned over a 20-year period to support revenue costs.

3.6 Table 6 below sets out the monies that have been received and then spent between 1st April 2025 and 31st March 2026 from Section 106 planning obligations signed by Nuneaton and Bedworth Borough Council and developers.

Table 6: Total amount of S106 contributions monies received and spent between 1st April 2025 and 31st March 2026 from signed planning obligations (this includes transfer to another body to spend).

Contribution Use	Monies Spent (£)
Police Infrastructure	53,264.78
Road Safety	2,870.00
Total	56,134.78

3.7 Table 7 below sets out the monies that have been received during any year, but which were spent between 1st April 2025 and 31st March 2026 from Section 106 planning obligations signed by Nuneaton and Bedworth Borough Council and developers and the infrastructure it has been spent on. The table is arranged alphabetically by contribution use and then by monies allocated (smallest first). Sub totals are provided throughout the table showing the total monies allocated for each contribution use. Table 7 contains all monies spent set out in Table 6 but is greater because it is those monies received from all years not just those received in 2025/26. For ease, those which are also in Table 6 have been highlighted in a pale blue,

therefore, those not highlighted have been received by the Authority prior to 2025/26 but spent in 2025/26.

3.8 This is the sixth IFS produced by the Council and as such some elements can be tracked through from the first IFS (2019/20) to this one (2025/26).

Table 7: Total amount of S106 contributions monies spent between 1st April 2025 and 31st March 2026 from signed planning obligations (this includes transfer to another body to spend) and the items of infrastructure it has been spent on.

Contribution Use	Site	Monies Spent (£)
Affordable Housing	Affordable Housing	96,861.18
Sub Total		96,861.18
Allotments	Greenmoor Road Allotments	4,349.38
Allotments	Ryders Hill Allotments	7,878.00
Allotments	Higham Lane Allotments	11,846.00
Allotments	Bulkington Allotments	12,400.00
Sub Total		36,473.38
Sport & Community Recreation	Bulkington Community Centre	50,611.56
Sub Total		50,611.56
Ecology & Biodiversity	Biodiversity	1,793.00
Ecology & Biodiversity	Bermuda Balancing Lake	20,133.90
Sub Total		21,926.90
Healthcare Provision	Healthcare Provision	1,940,075.67
Sub Total		1,940,075.67
Open Space	Sandon/Weddington Cycle Track	3,706.78
Open Space	Coronation Walk Cycle Track	5,171.29
Open Space	Lilleburne Play Area	30,991.03

Contribution Use	Site	Monies Spent (£)
Sub Total		39,869.10
Police	Police Infrastructure	53,264.78
Sub Total		53,264.78
Sport & Community Recreation	Buttermere Recreation Ground	2,207.11
Sport & Community Recreation	Bermuda Phoenix Centre	21,617.40
Sport & Community Recreation	Bedworth Physical Activity Hub	177,404.02
Sub Total		201,228.53
Transport	Road Safety	2,870.00
Sub Total		2,870.00
Total		2,443,181.10

3.9 None of the monies received between 1st April 2025 and 31st March 2026 from signed Section 106 planning obligations was spent on repaying money borrowed, including any interest. Between 1st April 2025 and 31st March 2026. £5,386.67 was received under planning obligations and spent on the monitoring of the delivery of planning obligations.

3.10 Table 8 below sets out the monies that have been received during any year, but which were retained between 1st April 2025 and 31st March 2026 from Section 106 planning obligations signed by Nuneaton and Bedworth Borough Council and developers and the infrastructure it has been allocated to. The table is arranged alphabetically by contribution use and then by monies allocated (smallest first). Sub totals are provided throughout the table showing the total monies allocated for each contribution use. Table 8 contains all monies allocated but unspent as set out in Table 5 but is greater because it is also those monies received from all years not just that received in 2025/26. For ease, those which are also in Table 5 have been highlighted in a pale blue, therefore, those not highlighted have been received by the Authority prior to 2025/26.

Table 8: Total amount of monies received during any year from signed Section 106 planning obligations, but which were retained between 1st April 2025 and 31st March 2026.

Contribution Use	Site	Monies Allocated (£)
Affordable Housing	Affordable Housing - Weddington	0.00
Affordable Housing	Affordable Housing - Whitestone	0.00
Affordable Housing	Affordable Housing - Attleborough	20,000.00
Sub Total		20,000.00
Allotments	Greenmoor Road Allotment increase capacity	0.00
Allotments	Milford Street Allotments	0.00
Allotments	Bulkington Allotment - Increase capacity	0.00
Allotments	Mount Pleasant Allotments	243.87
Allotments	Queen Street Allotments increase capacity	749.85
Allotments	Hilltop East Allotment - increase capacity	2,857.54
Allotments	Barnacle Lane Allotment capacity increase	4,526.50
Allotments	Wheelwright Lane Allotment - facilities	4,830.20
Allotments	Grange Road Allotments - increase capacity	5,017.83
Allotments	School Lane Allotment - Increase capacity	6,847.67
Allotments	Bowling Green Lane Allotment - Increase capacity	9,126.26
Allotments	Ryders Hill Allotments Increase capacity	9,375.08
Allotments	Weddington Allotment Extension	12,956.44
Allotments	Aberdeen Road Allotments increase capacity	16,830.19
Allotments	Higham Lane Allotments increase capacity	28,220.47
Sub Total		101,581.90
Community	Bulkington Community Centre	43,661.15
Sub Total		43,661.15

Contribution Use	Site	Monies Allocated (£)
Ecology & Biodiversity	Biodiversity Offsetting - Faultlands Farm	19,000.00
Ecology & Biodiversity	Biodiversity Offsetting - The Long Shoot, Nuneaton	24,181.92
Ecology & Biodiversity	Ecological Works - Stubbs Pool	25,612.00
Ecology & Biodiversity	Biodiversity Offsetting - Caldwell	29,860.61
Ecology & Biodiversity	Biodiversity Offsetting - Plough Hill Road	63,653.29
Ecology & Biodiversity	Biodiversity Offsetting - St Georges Way	68,414.86
Ecology & Biodiversity	Biodiversity Offsetting - South Milking Lane, Nuneaton	68,963.37
Ecology & Biodiversity	Biodiversity Offsetting - Higham Lane	74,513.79
Ecology & Biodiversity	Biodiversity Offsetting - Eastboro Way	82,178.00
Ecology & Biodiversity	Biodiversity Offsetting - The Long Shoot, Nuneaton	119,479.60
Ecology & Biodiversity	Biodiversity Offsetting - Bedworth Rugby Club	155,796.78
Ecology & Biodiversity	Biodiversity off-setting - Bulkington	416,437.93
Sub Total		1,148,092.15
Grounds Maintenance	Grounds maintenance 20 year contribution*	1,439,998.39
Sub Total		1,439,998.39
Open Space	Bermuda - Natural play provision	0.00
Open Space	Buttermere or Callendar - Additional play Provision	0.00
Open Space	Lilleborne Drive - Upgrade Play provision	0.00
Open Space	The Dingle - Upgrade paving	0.00
Open Space	Miners Welfare Park - Play pitch provision	123.49
Open Space	Stockingford Recreation Ground	197.89
Open Space	Newdigate Recreation Ground - Improvements	513.31
Open Space	The Long Shoot - Play & Open Space improvements	885.74

Contribution Use	Site	Monies Allocated (£)
Open Space	Vale View Community Centre - New gate and path	1,138.55
Open Space	Miners Welfare Park - K barrier under railway bridge	1,400.41
Open Space	Greenmoor Road Recreation Ground - Pitch provision	1,494.63
Open Space	Whittleford Cycleway - Signage	2,029.44
Open Space	Keresley Play Area - Upgrade	2,255.79
Open Space	Riversley Park - Green network signage	2,813.43
Open Space	Newdigate Park - Installation of signs off Potters Road	3,672.55
Open Space	Bedworth Sloughs - Access and path improvements	4,060.53
Open Space	Sandon Park - Improved access to play pitch	4,621.27
Open Space	Miners Welfare Park - All wheels provision	5,331.49
Open Space	Buttermere Park - Design & delivery of additional play provision	5,500.00
Open Space	Buttermere Park - Footpaths, play area and teenage facility improvements	5,743.66
Open Space	Miners Welfare Park - Path improvements	6,192.33
Open Space	Riversley Park - Improvements to Gold belt tunnel	6,457.28
Open Space	Riversley Park - Cycle path	6,874.72
Open Space	Sandon Park - Improvements	7,050.63
Open Space	Sandon Park - Footpath resurfacing	7,252.46
Open Space	Attleborough Rec - Cycle stands, green network signage	7,379.67
Open Space	Park Lane - Play pitch improvements	8,519.01
Open Space	Attleborough Recreation Ground - Improvements to football pitch	8,873.75
Open Space	Pauls Land - Provision of bins and benches	8,893.93
Open Space	Rannoch Drive - Junior play facilities	9,388.80
Open Space	Bermuda Bowling Green - Improvements	10,000.00

Contribution Use	Site	Monies Allocated (£)
Open Space	Pauls Land Pavilion - Improvements	10,573.75
Open Space	Windmill Hill - Provision of footpaths	11,777.89
Open Space	Heckley Park - Access paths, play and landscaping	12,181.58
Open Space	Upgrade of Play Areas	12,552.05
Open Space	Riversley Park - Creation of vistas and river maintenance	13,462.44
Open Space	Whittleford Park - Upgrade of footpaths	15,744.69
Open Space	Bermuda Open Space - Improvements	15,860.62
Open Space	Riversley Park - Entrance improvements	16,403.63
Open Space	Miners Welfare Park - Improvements from Rye Piece ring way entrance	16,539.08
Open Space	Riversley Park - Pingles area event facility	16,724.46
Open Space	Bermuda Phoenix Centre - Football pitch improvements	17,049.40
Open Space	Bulkington Recreation Ground - Improvements	19,328.45
Open Space	Riversley Park - Path creation	23,027.22
Open Space	Fusiliers Rest - Natural Play	29,055.90
Open Space	Miners Welfare Park - BMX provision and ball court	30,662.32
Open Space	Oaston Road - Footpath Construction	31,675.74
Open Space	Bermuda - Enhancement of Play Area	31,720.28
Open Space	Sandon Pavilion - Community facilities	33,565.31
Open Space	George Eliot Gardens - Gateway entrance	33,646.95
Open Space	Buttermere Park - Path and signage improvements	34,463.13
Open Space	Miners Welfare Park - Teenage play facilities	38,824.83
Open Space	Miners Welfare Park - Improvements to paths & signage	39,741.75
Open Space	Riversley Park - Football provision	41,124.01

Contribution Use	Site	Monies Allocated (£)
Open Space	Jubilee Centre - Footpath improvements	44,458.66
Open Space	Bulkington Recreation Ground/Barnacle Lane- Play, paths and landscaping	47,862.13
Open Space	Plough Hill Road - provision of sports pitches and signage in vicinity	52,365.00
Open Space	Rectory Drive Play Area - Additional play equipment	54,234.58
Open Space	Heckley Park/Bayton Lake - Natural Play	54,493.27
Open Space	Heckley Park - Teenage play facilities	66,419.91
Open Space	Miners Welfare Park - Splash park provision & Entrance improvements	72,460.71
Open Space	Riversley Park - Provision of Green Gym	72,683.15
Open Space	Heckley Recreation Ground - Pavilion & football pitch Improvements	77,811.26
Open Space	St Giles Rec. - Play provision, paths and signage	80,425.35
Open Space	Heckley Park - play facilities & green gym	80,795.65
Open Space	Riversley Park - Design and delivery of equipped play & fitness facility	90,727.21
Open Space	Riversley Park - New cycle bridge	106,741.01
Open Space	Sidings Pool, Smorrall Lane - Path & equipment improvements	111,437.58
Open Space	Whittleford Park - Improvements	111,827.55
Open Space	Miners Welfare Park - path links, green gym and access improvements	116,408.20
Open Space	Bulkington Recreation Ground - Teenage Leisure Provision	137,445.07
Open Space	Weddington - Footpath improvements	140,706.03
Open Space	Miners Welfare Park - Access improvements, play provision and event facilities	164,100.56
Open Space	Frensham Drive/Chaucer Drive - Play equipment & pathways	165,278.44
Open Space	Riversley Park - Visitor facility improvements	167,535.55
Open Space	Horeston Grange - Provision of Green Gym and Cycle works	172,160.85
Open Space	Weddington - Cycle Way	234,787.21

Contribution Use	Site	Monies Allocated (£)
Open Space	Coronation walk - Cycle Path	256,054.53
Open Space	Tiverton Drive Play Area - Upgrade	295,498.48
Open Space	Cycleway - (Blacktrack) The Shuntings	793,523.15
Sub Total		4,442,611.33
Sport & Community Recreation	Pingles LC - increase capacity for disabled facilities	20,233.75
Sport & Community Recreation	Design & Development Pingles HUB	50,000.00
Sport & Community Recreation	Heckley Fields - Provision of pitches & sports facilities	76,455.02
Sport & Community Recreation	Design and Development - new leisure centres Nuneaton	817,880.86
Sport & Community Recreation	Bedworth Rugby Club - New facilities	1,250,000.00
Sport & Community Recreation	Design & Development Bedworth HUB	1,932,103.81
Sub Total		4,146,673.44
Waste Contribution	The provision of bins to site off Leyland Road, Bedworth	6,625.66
Sub Total		6,625.66
Total		11,349,244.02

*Grounds maintenance contribution is apportioned over a 20-year period to support revenue costs.

4.0 Conclusion

4.1 This Infrastructure Funding Statement (IFS) reports on the Section 106 planning obligations that have been set out in those agreements signed by Nuneaton and Bedworth Borough Council and developers between 1st April 2025 and 31st March 2026 (Tables 1 and 2). It reports on those monies that the Borough Council has received from Section 106 planning obligations between 1st April 2025 and 31st March 2026 and explains the status of that money, whether it has been allocated or not to a specific project, and whether it has been spent and if so on what (Table 3 – 7). Finally, Table 8 sets out those monies that have been received from Section 106 planning obligations signed during any time but that the monies were retained between 1st April 2025 and 31st March 2026.

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Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 9

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	4 November 2026
Subject:	Street Naming and Numbering Fees and Charges
Portfolio:	Planning, Enforcement and Public Services
Responsible Officer:	Assistant Director - Planning
Corporate Plan – Theme:	Your Council
Corporate Plan – Aim:	All
Ward Relevance:	All
Public or Private:	Public
Amendment to Budget:	Yes Council Tax Related: No
Recommendation to Full Council:	Yes
Forward Plan:	Yes
Subject to Call-in:	Yes

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1. Purpose of Report

1.1 The purpose of this report is to inform Cabinet of the proposed increases to Street Naming and Numbering Fees and Charges currently being charged by the Council.

1.2 The report seeks Cabinet approval for the proposed Fees and Charges to be introduced from 1st April 2027.

1.3 The report also seeks approval for the implementation of the proposals to be delegated to the Assistant Director for

Planning, in consultation with the Portfolio Holder for Planning, Enforcement and Public Services where required.

2. Recommendations

It is recommended that Cabinet recommend to Full Council that:

2.1 The Street Naming and Numbering Fees and Charges proposed within this report be approved;

2.2 Delegated authority to make the necessary amendments to the Council's Central Fees and Charges Schedule to enable the proposed Fees and Charges within this report to be introduced from 1st April 2027 be given to the Assistant Director for Planning and the Assistant Director for Finance, in consultation with the respective Portfolio Holders where required.

3. Background

3.1 The Council's Street Naming and Numbering Fees have not been increased for a number of years. It is also recognised that the time and resources required to process and resolve Street Naming and Numbering applications, queries and issues, as well as to consult with relevant rate payers and other consultees such as the Royal Mail, can be significant. As such, a review has been undertaken into the existing Fees and Charges being charged by the Council in respect of the Street Naming and Numbering Service to ascertain whether or not the existing fees should be increased.

3.2 The relevant powers for local authorities for undertaking Street Naming and Numbering are contained in Sections 64 and 65 of the Towns Improvement Clauses Act 1847, and Sections 17, 18 and 19 of the Public Health Act of 1925. Under the provision of the Public Health Act 1925 – Section 18, Local Authorities are responsible for ensuring that street names and numbers for all new roads and housing developments are provided. They are also responsible for maintenance and replacement of street nameplates on adopted roads.

3.3 The Council can charge for elements of the naming and numbering function (which are discretionary services) by virtue of Section 64 and 65 of the 1847 Act cited above, coupled with Section 93 of the Local Government Act 2003.

3.4 The Local Government Act 2003 (as amended) also includes a general power for Best Value Authorities (as defined in section 1 of the Local Government Act 1999) in both England and in Wales to charge for discretionary services. Charges made under the power to charge at section 93 of the Act are limited to cost recovery. The Localism Act 2011 (as amended) introduced the General Power of Competence which permits Councils to charge for discretionary services at a level that recovers the cost of delivery.

3.5 Increasing Street Naming and Numbering Fees and Charges would ensure that the Council have a Street Naming and Numbering service that is sufficiently funded by the people that use it, and that the Council supports the local community by processing applications in a timely manner.

3.6 Following approval of the recommendations set out in section 2 of this report, the department will work with the Finance Department to ensure that the Council's Central Fees and Charges Schedule is updated accordingly to facilitate the fees being introduced from 1st April 2027.

3.7 This report does not seek approval to make any changes to the existing staff structure, and no additional budget is required to implement the proposed changes to the Fees and Charges for Street Naming and Numbering.

4. Body of report and reason for recommendations

Setting Fees and Charges

4.1 With regard to fee setting, due consideration has been given to the Council's Fees and Charges Policy (July 2025) ("the Policy"). The Policy sets out the Council's corporate approach that will be taken on fees and charges where the

Council has discretion on what charges are set for services provided. Following the Policy ensures the effective management of fees and charges and that the Council maximises commercial opportunities to generate income on the delivery of chargeable services.

4.2 The Policy states that when setting fees and charges, the following should be considered:

1. Service users must have agreed to receive and pay for the service.
2. Charges may be set differentially, allowing people to be charged different amounts.
3. The income must not provide an overall surplus to the Council.
4. Horizon scan other Local Authorities fees and charges.
5. The market in which services are operating.
6. Any market changes and whether the services need to be adapted to reflect changes.
7. Introducing a new chargeable service will require an Equalities Impact Assessment to identify and consider any impact on vulnerable groups.

4.3 In this case, the increases included in this report relate to Fees and Charges associated with discretionary services. These are non-statutory services that the Council is not obliged to provide, the associated Fees and Charges are set by the Council.

4.4 The Council's position is that charges for discretionary services are to be set at the appropriate level to fully recover their costs of delivery, unless there is a specific decision approved by Cabinet to subsidise the service provision for policy reasons. In this case it is considered appropriate to seek to recover the full cost of delivery of all discretionary services provided by the Street Naming and Numbering Team, including the relevant amount of organisational overheads.

4.5 The current 2026/27 Fees and Charges are set out below:

		2026/27 Prices
Street Naming & Numbering		
Numbering up to 10 addresses		£148.00
Numbering over 10 addresses	per address	£15.00
Street Naming	per street	£148.00
House naming or renaming	per house	£72.00
Street renaming	per street	£435.00

4.6 It is important that the resource required to provide a service is understood to ensure that the Fees and Charges cover the cost of the service. The Council's fees for Street Naming and Numbering should be based on the cost of Officer time taken to process and consider applications, consult and notify relevant parties, input data into corporate databases and otherwise disseminating the updated street and property information, in particular liaising with GeoPlace to ensure that the national address database is current and accurate. The time taken to liaise with applicants, stakeholders, and to produce reports for Portfolio Holders should also be considered. An uplift figure to recover any indirect costs to the Council of providing the service should also be taken into account. It is therefore important that the resource required to provide a service is understood to ensure that the agreed Fees and Charges cover the cost of the service.

4.7 Estimations of Officer resources required in the delivery of all existing Street Naming and Numbering services have been made by the Council's most experienced Street Naming and Numbering Officer. Each of the estimated fees has also been uplifted to account for all costs incurred by the Council in the delivery of the services, including infrastructure, staffing and equipment and so on, to enable full cost recovery in all respects. The corporate overheads

calculation has been provided by the Council's Finance Team.

4.8 The estimations indicate that the Council are currently undercharging for all discretionary services currently delivered by the Street Naming and Numbering Team. This is also a position supported by the benchmarking exercise provided at Appendix A of this report. As set out within the Policy, in scenarios where there is an undercharge for discretionary services, council taxpayers in general are subsidising the cost of the delivery of these services – potentially at the expense of the provision of another essential service to other Council residents.

4.9 As such, this report seeks approval to implement an increase in the Street Naming and Numbering Fees and Charges in respect of all discretionary services currently delivered. The Fees and Charges will be reviewed annually as part of the Council's budget setting process.

Proposed Street Naming and Numbering Fees and Charges

The below Fees and Charges for 2027/28 are proposed:

	2027/28 Prices
Street Naming & Numbering	
Numbering up to 10 new addresses	£1,050.00
Numbering over 10 new addresses	£1,050 (first 10 addresses) +

		£40.00 per additional address
Renumbering or renaming of existing addresses	per address	£150.00
Street naming (new street)	per street	£215.00
Street renaming	per street	£435.00 (no increase in fee)
House naming or renaming	per house	£135.00

4.10 Street Naming and Numbering as a service is not unique, nor are the individual services offered authority specific. Therefore, in order to sense check the proposed Fees and Charges, a benchmarking exercise has been carried out against other authorities offering the same discretionary Street Naming and Numbering services. A summary and comparison of these charges against the Council's existing charges has been provided in Table 1 below. The summary and comparison reveals that, in a number of cases, the Council's Street Naming and Numbering Fees and Charges are significantly lower than those being charged by the benchmarked authorities.

Table 1: Summary of other Council's Street Naming and Numbering Charges 2026/27 compared with proposed NBBC charges					
Request Type	Lowest Fee	Highest Fee	Average Fee	Current NBBC Fee (2026/27)	Proposed NBBC Fee (2027/28)
Street Naming and Numbering					

Numbering up to 10 addresses	£322.50	£1,246.000	£658.60	£148.00	£1,050.00
Numbering over 10 addresses	*Worked example of fees based on 50 dwellings: Rugby Borough Council: £1,077.00 (£21.54 per address) Warwick District Council: £2,742.00 (£54.84 per address) North Warwickshire Borough Council: £2,506.00 (£50.12 per address) Stratford Upon Avon District Council: £2,691.00 (£53.82 per address) Hinckley and Bosworth Borough Council: £1,600 (£32 per address) Harborough District Council: £1,810 (£36.20 per address) West Northamptonshire Council £1,612.50 (£32.25 per address) Tamworth Borough Council £2,110 (£42.20 per address) Birmingham City Council £3,500			£15.00 per address 50 dwellings: £750.00	£1,050 (first 10 addresses) + £40.00 per additional address

	(£70 per address)				
Renumbering or renaming of existing addresses (per address)	£31.70	£203.00	£100.93	£72.00	£150
House naming or renaming (per house/flat)	£31.70	£169.00	£73.55	£72.00	£135
Street renaming (per street)	£253.50	£394.00	£317.43	£435.00	£435.00 (no increase in fee)
Naming of a new street	£126.70	£1,890.00	£449.10	£148.00	£215.00
*Worked example provided as each Council's fees for numbering large developments are expressed differently					

4.11 Whilst the proposed fees in this report are based on cost recovery, the benchmarking exercise has allowed the department to ensure that the proposed fees are in line with other Fees and Charges set by other authorities.

Additional Income Generated

4.12 Whilst the proposed Fees and Charges set out within this report have the potential to significantly increase Street Naming and Numbering fee income, it should be noted that the amount of income which could be generated by the Street Naming and Numbering Team as a result of the proposed fee increases will depend on the amount of new development being constructed in the Borough at any one

time. It will also depend on the number of requests received by the Council for the renaming of existing streets and properties, both of which will fluctuate significantly.

4.13 Taking the Arbury allocated site as an example, the Council could charge the developer/s £61,650 in application fees to process and determine an application to number all 1,525 properties which may be developed on that site. This amount is based on the proposed fees set out in this report. In contrast, the same application to number 1,525 dwellings, if the existing fees charged by the Council are applied, would yield only £22,875 in application fees, £38,775 less than the proposed fees.

Price Reviews

4.14 Should the recommendations set out in this report secure approval from Cabinet and Full Council, the Street Naming and Numbering Team will adopt the use of time recording which will allow regular fee reviews to take place, in line with the Policy, and to assist with the Council's annual budget setting process.

4.15 The Policy confirms that reviews are to be conducted annually for all services fees and charges in time to inform the budget setting process. Resourcing formulas would be reviewed at least once a year to reflect inflation, as well as any changes to staffing and overhead costs.

Notification of Charges

4.16 In line with the Policy, if the proposed Fees and Charges are approved by Cabinet and Full Council, the Council's existing webpages would be updated to ensure that all service users are made aware of the relevant fee that is payable in advance of accessing a particular discretionary service. The Fees and Charges would also be published at the point of sale of each service.

4.17 Service users will be given sufficient notice before the introduction of new and increased Fees and Charges from 1st April 2027 which is in accordance with the Policy.

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

5.1 The Fees and Charges proposed in this report are proposed to be introduced from 1st April 2027. Consultation has taken place with the Council's Finance Team, the Council's Monitoring Officer and the Portfolio Holder for Planning, Enforcement and Public Services.

6. Financial Implications

6.1. The additional income generated would be used to invest in the Street Naming and Numbering Team in order to deliver various service improvements and to create additional resource and capacity where needed.

7. Legal Implications

7.1. The Localism Act 2011 introduced the General Power of Competence which permits councils to charge for discretionary services at a level that recovers the cost of delivery. This however does not permit a local authority to charge for any services rendered to an individual for which it has a statutory duty to provide unless legislation permits a specific charge to be made. This report does not propose any increases in charges in respect of services which the Council is mandated or has a duty to provide.

7.2. The recommendations set out within this report will ensure that the charges or the increase of existing charges for discretionary services would be in accordance with the provisions of the Localism Act 2011 (as amended), as well as the provisions set out in Section 93 of The Local Government Act 2003 (as amended).

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. None.

10. Environmental implications

10.1. None.

11. Section 17 Crime and Disorder Implications

11.1. None.

12. Risk management implications

12.1. This report does not propose any increases in charges in respect of services which the Council is mandated or has a duty to provide.

13. Human resources implications

13.1. It is not anticipated that additional resources in the Street Naming and Numbering Team will be required as the increase in Fees and Charges proposed under this report relate to services already being delivered by the Team.

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 its recommendations, the following option was identified. The reasons for its rejection are outlined below.

Option Ref	Option Title	Reason for rejection
A	To not proceed with the proposed increases in Street Naming and Numbering Fees and Charges	Rejected – Not approving the proposed increases in Street Naming and Numbering Fees and Charges will result in the Council continuing to undercharge for discretionary Street Naming and Numbering services and not recovering the costs associated with providing the services.

17. Conclusion

17.1. That Cabinet approve the recommendations set out in section 2 of this report.

18. Appendices

18.1. Please note the following appendices:

(i) Appendix A – Street Naming and Numbering Fees and Charges Benchmarking

19. Background papers

19.1. Please note the following background papers:

(i) Nuneaton and Bedworth Borough Council Fees and Charges Policy – July 2025

20. Report Writer Details:

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Officer Name: Louise Hryniw

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Appendix A – Street Naming and Numbering Fees and Charges Benchmarking

Stratford Upon Avon District Council Fees 2026/27	
Street Naming and Numbering	Fee (inc. VAT as applicable)
Per New dwelling/unit following demolition/conversion	£169
Numbering of new development	£846 (First 5 plots) + £41 per additional plot
Amend a development layout	£169 per new plot affected

Rugby Borough Council Fees 2026/27	
Street Naming and Numbering	Fee (inc. VAT as applicable)
Add a name to an existing address - Price per address	£31.70
Change an existing address - Price per address	£31.70
Register a new address - Price per address	£31.70
New Addresses on Large Developments - Price per 2 - 5 plots	£126.70
New Addresses on Large Developments - Price per 6 - 10 plots	£253.50
New Addresses on Large Developments - Price per 11 - 19 plots	£380.20

New Addresses on Large Developments - Price per 20+ plots	£507.00
Price per additional plot	£19.00
Register a new street – Price per street	£126.70
Rename an existing street - Price per street	£253.50
+ a per address charge - Price per address	£31.70

North Warwickshire Borough Council Fees 2026/27	
Street Naming and Numbering	Fee (inc. VAT as applicable)
New Development (Residential and Commercial)	£156 application fee +£47 per property
Amend a Development layout after confirmation (per plot)	£47.00
Naming of a New Street	£202.00
Add/Rename/Renumber a PAF registered property	£88.00
Correcting an address anomaly	£47.00
Confirmation letter to solicitors/others	£36.00

Warwick District Council Fees and Charges 2026/27	
Street Naming and Numbering	Fee (inc. VAT as applicable)
Naming of a new street	£205.70
New dwelling/unit(s) following demolition/conversion	£124.60 per plot
Numbering of new development: 1 to 10 plots	£124.60 per plot
Numbering of new development: 11+ plots	£1246.00 + £37.40 per plot
Rename or renumber of an existing property	£62.30
Add a name to existing numbered property	£62.30
Amend a development layout	£124.60 per new plot affected
Additional copies of ‘confirmation of address’ letters	£37.40

Renaming of a street	Price upon request

Hinckley and Bosworth Borough Council Fees and Charges 2026/27	
Street Naming and Numbering	Fee (inc. VAT as applicable)
Renaming/renumbering of existing property	£50
Naming/Numbering of one to five properties	£50 each
Naming/ Numbering for more than five plots	£30 each additional
Naming of a street	£175 each
Change to a development after notification	£60 admin fee plus £25 per plot
Street re-naming at residents' request	£270 plus all compensation met by applicant with a two thirds majority agreement from residents
Written confirmation of postal address details	£30
Numbering of a new flat complex	£35 per flat

Harborough District Council Fees and Charges 2026/27	
Street Naming and Numbering	Fee (inc. VAT as applicable)
Naming/Numbering of one to five properties	£56 each
Naming/Numbering for more than five plots	£280 for 5 properties plus £34 for each additional property
Naming/Numbering of new buildings of multiple occupancy	£56 plus £34 per unit/flat within
Naming of a street	£225 each street
Changes to a development after notification	£113 admin fee plus £29 per plot

Renaming/renumbering of existing single property	£56
Street re-naming at residents request	£394 plus all compensation met by applicant with a two thirds majority agreement from residents
Written Confirmation of postal address details	£34

West Northamptonshire Council Fees and Charges 2026/27	
Street Naming and Numbering	Fee (inc. VAT as applicable)
House name change (existing property) - charge per property	£55
Numbering/naming per plot/property	£32.25
Numbering/naming (new properties) - 1 to 5 plots - charge per plot	£32.25
Numbering/naming (new properties) - 6 to 25 plots - charge per plot	£32.25
Numbering/naming (new properties) - 26 to 75 plots - charge per plot	£32.25
Numbering/naming (new properties) - 76+ plots - charge per plot	£32.25
Additional charge where this includes naming of a building (for example, block of flats) - charge per building	£180
Renaming of existing street where requested by residents	£352.25 plus £37.50 per property
Additional charge to house numbering where this includes naming of new street - charge per property	£25

Amending schedule of development already issued following plot change by developer (per plot affected)	£42

Tamworth Borough Council Fees and Charges 2026/27	
Street Naming and Numbering	Fee (Inc VAT as applicable)
Single residential/commercial property	£150
Each additional residential or commercial property (e.g. 5 houses would result in £150 + 4 x £15 = £210)	£40 per plot
Change of development layout after notification	£40 per plot
Addition or change of property name	£80
Building conversions (includes subdivision into flats)	£25 per unit created
New street name	£190
Confirmation of postal address (commercial enquiries)	£32

Birmingham City Council Fees and Charges 2026/27	
Street Naming and Numbering	Fee (Inc VAT as applicable)
Street naming - application fee (non-refundable) plus fee for each property/unit/plot below	£210
Street naming - addressing of each property, unit or plot	£70
Street naming - naming a new road or roads (plus cost as for property numbering)	£347
Revising an address after notification of postal address - application fee (non-refundable)	£210

plus fee for each property, unit or plot below	
Revising an address after notification of postal address - fee for each property, unit or plot	£70
Confirmation of postal address to solicitors, commercial organisations and so forth - application fee (non-refundable) plus fee for each property, unit or plot below	£210
Confirmation of postal address to solicitors, commercial organisations and so forth - fee for each property, unit or plot	£70
Renaming of a street - application fee (non-refundable) plus fee for staff time below	£1,890
Renaming of a property or a street - hourly rate for staff time plus legal fees where appropriate	£39
No maximum fee set for street naming and numbering	

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 10

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	4th November 2026
Subject:	Great Crested Newt District Licensing scheme
Portfolio:	Planning, Enforcement and Public Services
Responsible Officer:	Assistant Director - Planning
Corporate Plan – Theme:	Green Spaces and Environment
Corporate Plan – Aim:	Explore opportunities to promote, protect and enhance biodiversity in the Borough.
Ward Relevance:	All
Public or Private:	Public

Amendment to Budget: No

Council Tax Related: No

Recommendation to Council: No

Forward Plan:	Yes
Subject to Call-in:	Yes

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1. Purpose of report

1.1 The purpose of the report is to set out the proposal for the Council to enter into a Memorandum of Understanding with the NatureSpace Partnership to join the Warwickshire, Coventry & Solihull Great Crested Newt (GCN) District Licensing Scheme.

1.2 This report also recommends granting delegated authority to the Assistant Director – Planning for the issuing of authorisations under the Warwickshire, Coventry & Solihull Great Crested Newt District Licensing Scheme.

2. Recommendations

2.1 That Cabinet approves the Council entering into a Memorandum of Understanding with the NatureSpace Partnership ('NSP') to join the Warwickshire, Coventry & Solihull Great Crested Newt District Licensing Scheme ("the Scheme"), which is run by Natural England.

2.2 That Cabinet delegates authority to the Assistant Director – Planning to sign the Memorandum of Understanding if the Assistant Director deems necessary in order to protect the Council's interests and also to enter into all other associated documents on the same terms.

2.3 That Cabinet delegates authority to the Assistant Director-Planning to issue authorisations under the Council's District Licensing Scheme for Great Crested Newts.

3. Background

3.1 Developments affecting GCNs, or habitats known likely to be utilised by GCNs, often require surveys, mitigation measures and a European Protected Species Licence issued by Natural England before development can proceed.

3.2 Under the established traditional licensing procedure, surveys are seasonally constrained between March and June, licensing can take 90 plus days to obtain and projects can be delayed significantly, in some cases up to a year, due to the survey window.

3.3 Warwickshire County Council had previously explored establishing its own District Licensing Scheme, however, this is no longer progressing. Following a review of available options, the Planning team's preferred approach is to partner with the NSP who are an independent not-for-profit organisation who have been authorised by Natural England to operate a District Licensing Scheme on behalf of Local Authorities. The Scheme currently covers 12 counties,

working with over 70 local authorities and several major infrastructure providers.

4 Body of report and reason for recommendations

What is District Licensing?

4.1 District Licensing is a Natural England approved alternative to the traditional licence approach. It simplifies requirements and streamlines the process for developers and can be used for any development that requires planning permission and council led permitted development works.

4.2 The proposed partnership with NatureSpace – agreed through the MoU – enables the Council to issue licences to developers rather than the developers applying to Natural England. NatureSpace acts as in effect a managing agent on behalf of the Council to ensure that developers have everything correctly in place in order to be granted a licence for the development.

4.3 By committing to the Scheme and meeting all its requirements developers can be assured of being granted a licence thus removing potential uncertainty. In comparison to the established licensing approach, they also avoid procedural complexities potentially delaying their scheme. In turn, due to the way NSP manages the Scheme, significant practical habitat creation and conservation management beneficial to Great Crested Newts is funded and carried out. There are no costs to the Council. All the Scheme costs including the conservation management work are met from the fees paid by the developers who choose to opt into the Scheme.

4.4 If approved, the proposals will result in NSP applying to Natural England to add NBBC to the existing Warwickshire & West Midlands District Licence. Natural England will only grant the licence to authorities who have provided written consent that they wish to be part of the District Licensing Scheme. The Scheme will be delivered in accordance with the legal requirements of regulation 55 of the Conservation of Habitats and Species Regulations 2017 (as amended) ensuring that any impacts on GCN are properly accounted for and effective mitigation and compensation are delivered for those impacts.

How does it work?

4.5 NSP develops a detailed GCN risk map for the licensed area. Developments which are in high-risk zones that may have an impact on GCNs have the option to use the District Licensing Scheme. The developer pays a proportionate fee for an official report which is completed within 10 working days and is submitted by the Developer alongside the planning application. The Local Planning Authority would then apply planning conditions to integrate planning and licensing. Written authorisation must be provided by the Local Planning Authority to the developer, to enable the developer to carry out development activities under the District Licence. In all cases where a development is to be authorised under a District Licence, the Local Planning Authority will grant authorisation to a developer following a grant of planning permission and only if the developer has provided a NatureSpace certificate to confirm all compensatory payments have been made to NatureSpace.

4.6 The Council will hold its own District Licence and will be the licensee and will be responsible for securing compliance of its licence's terms and conditions within the Borough, where reasonable. NatureSpace provide training and administer the Scheme on the Council's behalf including site assessments, monitoring and reporting on the licence to Natural England and leading on enforcement where necessary, in partnership with the Council.

4.7 For the purposes of this report, 'authorisations' relate to requests made to NatureSpace by a developer to work under the Warwickshire, Coventry and Solihull Great Crested Newt District Licensing Scheme. The final step for a developer to be able to work under the Scheme is to obtain written authorisation from NatureSpace which is a document that must be signed by the Council. This report recommends granting delegated authority to the Assistant Director – Planning for the issuing of authorisations. NatureSpace will carry out the remaining administrative work required in respect of the authorisation process.

4.8 Other associated documents set out in recommendation 2.2 would consist of the approval letter which is signed by the Council and sent by NatureSpace to Natural England for the Council to join the GCN District Licensing Scheme which is in Appendix B, and any other required documentation that is necessary in association with the Council's ongoing participation in the GCN District Licensing Scheme.

4.9 In terms of monitoring for compliance, the Local Planning Authority will monitor compliance with any planning conditions (as a result of the developer entering the scheme), including if conditioned documents aren't complied with in part (with NatureSpace support), monitor compliance with the District Licence conditions, support NatureSpace with compliance site visits (if applicable) and may bring planning enforcement action where expedient to ensure that a developer is complying with their responsibilities under the licence. This work would be undertaken by the District Licensing Officer. Any site visits to development sites would be organised by the District Licencing Officer and would be timed to be in the correct season and at a reasonable time for the development.

What are the benefits?

4.10 The 'traditional' and established Great Crested Newt licensing regime is known to cause delays for developers and increase their costs (in some cases quite significant). There are costs and potential delays associated with every stage of the process: (a) site survey – only by licensed ecologists and in spring / early summer only; (b) detailed site survey reports with recommendations for mitigations often involving replacement habitat to be created; (c) LPA determination of the planning application – Local Planning Authority must be convinced that the licence will be forthcoming from Natural England – i.e. justified.

4.11 The benefits of participating in the District Licensing Scheme for Local Authorities include:

a) Benefit from NatureSpace's expertise in delivering a licensable GCN scheme, including mapping.

b) GCN Offsetting will remain in Warwickshire and/or the sub-region.

c) The Scheme funds a dedicated District Licensing Officer. Warwickshire County Council are recruiting for this post and it is anticipated that this will be filled by the end of 2026. This post is funded by NatureSpace and will work with all Councils and NatureSpace.

d) Become part of a wider partnership to develop and consolidate existing species

e) Ability to opt out at anytime

f) Having a streamlined scheme in place will also help speed up the delivery of development, whether it is residential, commercial property or infrastructure, and support economic growth.

4.12 NatureSpace promotes their scheme as:

- Removing the uncertainties and delays of the old licensing system, as there is no need for newt surveys and no separate licence application to Natural England.
- For the payment of a fixed licence fee, calculated according to the impact of the development on newts, the developer is provided with a certificate which is accepted by the Local Planning Authority as meeting all the developer's Great Crested Newt responsibilities.
- Broadly the Scheme pays for a conservation strategy that creates four new ponds for every newt pond lost, multiplying the benefits for Great Crested Newts along with associated other wildlife.
- Being speedy, straight forward, certain in outcome and sustainable.

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

5.1 Discussions have taken place with Warwickshire County Council's Ecology Team and the NatureSpace Partnership with regard to how the Scheme will operate alongside the existing Service Level Agreement (SLA) currently in place with Warwickshire County Council and the benefits of participating in the District Licensing Scheme. The current SLA sets out the terms and conditions upon which Warwickshire County Council will provide advice for the purposes of planning functions to the Planning Authority, including ecology. As the District Licensing Officer is being recruited into the Warwickshire County Council's ecology team to provide District Licence support to all of the LPAs, this additional factor would need to be covered in the SLA. The draft Memorandum of Understanding has been reviewed by the Legal Team who have not recommended any changes.

6 Financial Implications

6.1 Other than staff involvement which would be focussed primary in the early stages of entering into the Scheme, the Scheme would be cost neutral to the Council with no financial input required.

6.2 There are no direct costs for participating Councils and the Scheme is entirely funded through developer contributions from those who choose to participate.

7 Legal Implications

7.1 Local Planning Authority partners are required to sign-up to the Memorandum Of Understanding. A copy is attached as Appendix A. The draft Memorandum of Understanding has been reviewed by the Legal Team who have not recommended any changes.

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

10 Environmental implications

10.1 No environmental implications have been identified. However, the Scheme will allow opportunities to promote, protect and enhance biodiversity in the Borough.

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 Staff time from the Council would be required to provide data and to liaise with NatureSpace both in relation to the strategic delivery and over individual applications (development management and planning policy officers).

14 Biodiversity Implications

14.1 No direct biodiversity implications have been identified. However, the Scheme will allow opportunities to promote, protect and enhance biodiversity in the Borough.

15 Local Government Reorganisation (LGR) Implications

15.1 The following LGR implications have been identified:

i. The GCN licence will need to be adapted to cover the new authorities and resent to Natural England for the licence to be renewed. NatureSpace are experienced in this process.

16 Options considered and reason for their rejection

16.1 In formulating this report and recommendations, the following option was identified. Reasons for its rejection or why the option and recommendations proposed in section 2 of the report have 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	NBBC does not participate in the District Licensing Scheme.	The Council could choose to not participate in the Scheme. Existing statutory protection for Great Crested Newts would continue to apply and developers and the Council as Local Planning Authority would need to progress planning applications in accordance with established processes. However, the Council would be missing a significant opportunity to both (i) assist developers with their proposals by offering an alternative more stream-lined licensing procedure in places subject to Great Crested Newt protections and (ii) to

		contribute to a significant new Great Crested Newt habitat creation and conservation management project of benefit to wider biodiversity.

17 Conclusion

17.1 Cabinet are asked to approve the recommendations set out in the report.

18 Appendices

18.1 Appendix A- Memorandum of Understanding
18.2 Appendix B- Approval letter which is signed by the Council and sent by Naturespace to Natural England for the Council to join the GCN District Licensing Scheme

19 Background papers

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

19.2 Further information on the District Licensing Scheme can be viewed on the NatureSpace's website: A quick, simple, certain and sustainable solution to newt mitigation - NatureSpace Partnership Limited

20 Report Writer Details:

Officer Job Title: Planning Manager- Development Control

Officer Name: Claire Hill

Appendix A

Memorandum of Understanding

NatureSpace Partnership and XX Council(s)

Delivery of
District Licensing for great crested newts

A partnership in relation to the delivery and implementation of the great crested newt District Licensing Scheme (the Scheme) between

1) The NatureSpace Partnership (NatureSpace) of 22 St. Peters Street, Stamford, Lincolnshire, England, PE9 2PF (company number 10755017) ("NatureSpace") and;

2) The XX Council of XX.

Each "Party" and together "The Parties"

Effective date: XX

Review date: XX

Background

Great crested newts are a European protected species (EPS) and are protected in the UK under the Conservation of Habitats and Species Regulations 2017 (as amended) and, to a certain extent, the Wildlife and Countryside Act 1981 (as amended). Where works would harm this species or their habitats, a licence is required in order to make those activities lawful.

Natural England is the licensing authority in England and is able to grant organisational licences ('District Licences') for great crested newts to local planning authorities (LPAs). This enables LPAs to grant authorisation to developers to work under the District Licence at the same time or following the granting of planning permission for a development. Before granting a District Licence, Natural England must be satisfied that the legal licensing tests, as set out in Regulation 55 of the Conservation of Habitats and Species Regulations 2017 (as amended), are fully met.

The availability of the District Licence creates an easier, quicker licensing option for developers, where the need for a separate licensing process can be avoided and thus save developers considerable time and expense in dealing with great crested newts. District Licensing Schemes also improve planning processes and deliver net gain for great crested newts at no extra cost to LPAs.

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The District Licence is granted to LPAs based on:

- eDNA survey and modelling – to enable mapping of great crested newt habitat suitability across the region;
- the design and implementation of a spatial conservation strategy to deliver net gain for, and an improvement in conservation status of great crested newts across districts and regions;
- the design and implementation of an operational scheme to fairly and proportionately charge developers that wish to enter the scheme and which meets all legislative and policy planning requirements, designed and delivered by NatureSpace for participating LPAs;
- a commitment to the implementation, by NatureSpace and the Newt Conservation Partnership, of the spatial conservation strategy to ensure that development impacts on the species are mitigated, compensated, monitored and reported; and
- detailed annual reporting and 5-yearly renewal process that confirms uptake, success of the scheme and delivery by NatureSpace on behalf of the LPAs.

NatureSpace has been working with LPAs, Amphibian and Reptile Conservation Trust, Freshwater Habitats Trust and the Durrell Institute for Conservation and Ecology (DICE) since 2017 to design and implement the Scheme. The Scheme:

- Works across several contiguous LPAs at a landscape scale.
- Funds the preparatory work necessary for LPAs to apply for and operate a District Licence.
- Creates and administers all of the mechanisms needed for developers to (voluntarily) engage with the process.
- Funds the up-front creation of ponds and habitat so that compensatory gain precedes loss.
- Funds a not-for-profit Community Benefit Society (the Newt Conservation Partnership) to work with landowners to deliver pond and habitat creation, restoration, management and monitoring.
- Independently creates and applies a 'newt metric' that embeds the mitigation hierarchy and prescribes in advance planning conditions relating to newts – so that LPAs are not liable for these decisions.
- Delivers a conservation strategy that ensures a ratio of at least 4 high-quality ponds created for every occupied pond lost through development authorised under the District Licence.
- Funds the long-term management and monitoring programme.
- Funds the appointment of District Licensing Officers to support LPAs.
- Reacts and adapts to developer uptake.

Though there are many advantages for developers in applying to have their work covered by a great crested newt District Licence, it is not mandatory for them to do so – developers can, if they choose, continue to apply for a licence under the standard licensing system via Natural England. However, it is expected that LPAs will raise awareness amongst developers and their agents etc. of the availability of the District Licence option. All licensing decisions that *are* made under the District Licensing scheme must then contribute to the spatial conservation strategy and must be delivered through NatureSpace.

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This MoU between NatureSpace and XX Council seeks to protect all parties through clear definition of roles and responsibilities. This MoU will apply for the period XX to XX, or for as long as any District Licence issued by Natural England to the LPA(s) is operational.

Terms:

1. The spatial conservation strategy, the scheme design and metrics, and all other documentation to be submitted to Natural England as the basis for the District Licence applications, reports and renewals will be funded and delivered by NatureSpace, in close co-operation with, and to the satisfaction of, and agreement by, the Council.

2. The spatial conservation strategy, the scheme design and metrics, and all other documentation remain the intellectual property of NatureSpace.

3. NatureSpace will adhere to the terms of any District Licence issued and will provide timely and appropriate advice and recommendations to the Council(s) in accordance with the District Licence. All services and arrangements will be facilitated in an unbiased, independent and transparent manner.

4. There are no costs to the Council(s) associated with taking part in the District Licensing scheme.

5. Participating Council(s) agree to promote and publish details of the District Licensing scheme.

6. Whilst District Licensing saves LPA planners and ecologists time, the effective delivery of the District Licence does require (relatively minor) administrative, planning and enforcement resources from the Council(s). NatureSpace will provide resources to ensure Council(s) are fully supported to implement the scheme either via a dedicated District Licensing Officer employed by NatureSpace at a County level, or by funding to the LPA to cover all reasonable costs associated with LPA resource needs (on an annual basis, in advance, subject to detailed agreement). A job description for District Licensing Officers support within or for LPAs is provided in Schedule 2.

7. The Council(s) agree to use NatureSpace as the sole provider of district great crested newt licensing services for the duration of the MoU period.

8. The Council(s) agree to work within the guidelines and protocols set out in the Licence and any guidance issued by Natural England relating to District Licensing, insofar as relevant to the Council(s), and to provide information, evaluation and feedback on use of the Licence to Natural England, where requested, according to the terms of the District Licence.

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9. For the purposes of securing compliance with the scheme, the District Licensing Officer is responsible for establishing and maintaining communications with authorised developers, undertaking compliance checks (desk-based and site-based) and reporting relevant findings to all parties. NatureSpace and the Council agree to work together to ensure compliance with District Licence requirements (including related planning conditions) at authorised development sites.

10. All parties agree to consult each other in relation to any publicity material that references each party in any way, or the relationship that exists, or any particular development or compensatory site brought about by the scheme via this MoU.

11. All parties agree to share any relevant detail about arrangements or partnerships with other parties that may affect the working relationship or the outcomes of the District Licence Scheme, save as prevented by law or pre-existing contractual agreement. This must at least include the relevant Local Biological Records Centre.

12. NatureSpace and the Council agree to share relevant mapped information and records, not subject to other restrictions, that are relevant to the District Licence scheme.

13. The Partnership Leads listed in Schedule 1 are the main contacts for all parties to use and will be jointly responsible for arranging any meetings required between parties.

Confidentiality

Subject to the requirements of the Freedom of Information and Environmental Information requests the parties agree not to divulge the details, methodology, processes or inner workings of the District Licence scheme to third parties (including artificial intelligence tools) without the express permission of all the parties in writing. The parties shall use all reasonable endeavours to ensure that the employees of each of the parties shall observe a similar obligation of confidence.

Artificial Intelligence Use Restriction

The Parties agree that they shall not, directly or indirectly, input, disclose, or otherwise incorporate any Data or information relating to District Licensing into artificial intelligence programmes or systems (including, without limitation, ChatGPT, Microsoft Copilot, or AI functionality embedded in applications or software), unless agreed in writing by all Parties. This prohibition extends to the use of such Data or Project information for the purposes of training, fine-tuning, validating, or otherwise developing any artificial intelligence, machine learning, or automated decision-making systems, and to the generation, publication, or dissemination of any derivative datasets, models, or outputs arising therefrom. The foregoing examples are illustrative only and shall not be construed as an exhaustive list of prohibited uses.

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Data Sharing

The parties agree to share relevant data and information necessary to fulfil the objectives outlined in this MoU. Shared data should only be used for the purposes specified herein and should be handled in accordance with applicable data protection laws, confidentiality obligations and may require a separate data sharing agreement. Each party shall ensure that any data shared is accurate, complete, and provided in a timely manner.

Intellectual Property Rights

a. All pre-existing intellectual property owned by either party prior to the execution of this MoU shall remain the sole property of that party.

b. All rights, including Intellectual Property Rights in or arising out of or in connection with the District Licensing scheme shall be owned by NatureSpace.

Termination

Any party may terminate the relationship as detailed within this MoU subject to 4 weeks' notice given in writing to the other parties specifying the reason. The Agreement and any associated terms would no longer apply to that party should this occur. Alternatively, should either a party's business, organisation or department cease to exist then the MoU will be immediately reviewed.

Dispute Resolution

In the event of any significant dispute arising between any of the parties in relation to any aspect of this MoU, which must be made formal as soon as is reasonable, the named Partnership Leads in Schedule 1 will meet as soon as possible, with other parties as may be necessary, to try and resolve the issue and ideally within 2 weeks of formal notice of a dispute. With the agreement of all Partnership Leads additional parties may attend any dispute resolution meetings. If a resolution cannot be found, then the MoU will be terminated with regard to that party according to the termination conditions detailed above.

Execution

This Agreement has been entered into on the date stated at the beginning of this Agreement.

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Schedule 1 – Partnership Leads

A named representative for NatureSpace
A named representative for the/each Council

There shall also be a named substitute for each Partnership Lead who can act when that individual is either one of the parties in dispute or cannot be involved for other reasons.

Named Partnership Leads are to be confirmed by the parties to this agreement within one month of signing this Memorandum of Understanding

Signed by Date:)
)
)
Print name:)
for and on behalf of NatureSpace Partnership

Signed by Date:)
)
)
Print name:)
for and on behalf of XX Council

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Schedule 2 - Summary role description

The role of the District Licensing Officer is to understand the extent, scope and detail of the scheme, raise awareness of the scheme internally within the local planning authority (especially with planning colleagues), understand planning and licensing requirements, ensure the required processes are followed internally, and monitor and advise on compliance and enforcement measures. The District Licensing Officer will also raise awareness of the scheme to developers, consultants and agents.

Main duties:

Raise general awareness of GCN licensing requirements and the optional licensing scheme

- With developers, planning agents & ecologists – through LPA websites, literature, pre- (and during) application discussions & correspondence, etc.
- Within the LPA - promote the scheme, and the newt conservation strategy, across all appropriate staff and Council members.

Ensure good planning decisions

- Ensure planning officers are familiar with the scheme and the process (dealing with NatureSpace certificates, reports and authorisations)
- Assess planning applications to assess potential ecological impacts (specifically impacts on great crested newts) to ensure that developments properly identify and where appropriate, address their ecological impacts.
- Provide clear, timely, accurate and specific advice to LPA ecologists and planning officers on any development in respect of great crested newts and the options/requirements for licensing including the district licensing scheme
- Support planning officers to ensure that the District Licence requirements for developments wishing to use the District Licence are converted fully and appropriately into planning conditions and authorisations at the appropriate time
- Monitor developer compliance with any newt-related planning conditions and advise planning and enforcement teams, NatureSpace and Natural England on any compliance and enforcement issues
- Undertake site visits and meetings as required, to provide advice and guidance on newt licensing requirements

Data management

- Provide accurate and timely data on planning work and outcomes

Good communication

- Participate in and contribute to the District Licensing Officer network across the wider District Licensing Scheme area to ensure consistency and high standards
- Provide a point of contact for newt-related matters for planning authorities to liaise with NatureSpace Partnership, the Newt Conservation Partnership and Natural England as required

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- Provide a point of contact for members of the public/consultants/developers and other interested parties wanting information and advice on the district licensing scheme
- Ensure relevant Council staff and members are informed of the outputs and outcomes of the scheme, as appropriate.

Qualifications & experience requirements

1. A relevant degree in ecology or environmental management
2. Knowledge and understanding of the UK planning system, including ecological impact assessment and/or biodiversity in planning
3. Knowledge of European protected species legislation, licensing, planning and licensing policies
4. A genuine enthusiasm for ecology and conservation in the UK
5. A full driving licence with access to a car for business travel.

Essential key skills:

- Highly organised, methodical and conscientious - able to juggle and prioritise multiple cases, enquiries and tasks, and work efficiently to meet tight deadlines
- An excellent communicator with good inter-personal skills - able to liaise proactively and confidently with clients, consultants (e.g. ecologists, planners), planning and other regulatory authorities, NGO partners and colleagues
- Highly literate, able to prepare documents quickly and diligently to a high standard, following defined processes, protocols and guidance.
- Excellent I.T. skills
- Self-motivated and independent - able to work flexibly and with minimal supervision, as part of a small, dispersed team
- Willingness and ability to travel as necessary

Desirable key skills:

- Practical first-hand experience in great crested newt survey, mitigation practice and licensing
- Competence in using GIS software, preferably ArcGIS or QGIS

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LETTER HEAD

DATE

Dear Natural England DLL team

Re: District Licence application for the COUNTY region on behalf of XX Council

I can confirm XX Council wishes to apply for a District Licence for great crested newts. The request and application documents have been prepared by NatureSpace Partnership on our behalf.

I am authorised to sign on behalf of XX Council.

It is our intention to take this scheme into account in development management and in formulation or review of planning policies, where appropriate.

If you have any queries, please contact XX (email / telephone) or Matt Blee at NatureSpace Partnership (matt.blee@naturespaceuk.com / 07747821027).

Yours sincerely,

signed

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 11

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	4th November 2026
Subject:	Planning Income Generation Project
Portfolio:	Planning, Enforcement and Public Services

Responsible Officer: Assistant Director - Planning

Corporate Plan – Theme: Your Council

Corporate Plan – Aim: All

Ward Relevance: All

Public or Private: Public

Amendment to Budget: Yes Council Tax Related: No

Recommendation to Full Council: Yes

Forward Plan: Yes

Subject to Call-in: Yes

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1. Purpose of Report

1.1 The purpose of this report is to inform Cabinet of the Planning Income Generation Project which encompasses a set of income generation proposals for the Planning Department ("the department"). It provides details of 9 proposed income streams which would be generated through a number of proposed operational changes. These include expanding the department's existing commercial operations, and introducing charges for the discretionary services it already provides free of charge.

1.2 The report seeks Cabinet approval for the proposed S106 Monitoring Fees to be introduced from 1st January 2027 which would require changes being made to the Council's Central Fees and Charges Schedule in-year. The remaining 8 proposed income streams are proposed to be introduced from 1st April 2027.

1.3 Full details of all 9 proposed income streams are provided within the appended Planning Income Generation Project Supporting Paper (Appendix A).

2. Recommendations

It is recommended that Cabinet recommend to Full Council that:

2.1 The Fees and Charges arising as a result of the income generation proposals for the Planning Department (as set out in section 4 and Appendix A of this report) be approved.

2.2 That the necessary amendments to the Council's Central Fees and Charges Schedule to enable the proposed Fees and Charges within this report to be introduced from 1st April 2027, save for the proposed S106 Monitoring Fees which would be introduced from January 1st 2027, be delegated to the Assistant Director for Planning and the Assistant Director for Finance, in consultation with the respective Portfolio Holders where required.

2.3 That the implementation of the Income Generation proposals be delegated to the Assistant Director for Planning, in consultation with the Portfolio Holder for Planning, Enforcement and Public Services where required.

3. Background

3.1 A review has been undertaken into the types of fees and charges currently in place in the department to ascertain whether the department are able to generate any additional income by expanding its existing commercial operations, and in respect of introducing charges for the discretionary services it already provides free of charge.

3.2 The Local Government Act 2003 (as amended) includes a general power for Best Value Authorities (as defined in section 1 of the Local Government Act 1999) in both England and in Wales to charge for discretionary services. Charges made under the power to charge at section 93 of the Act are limited to cost recovery. The Localism Act 2011 (as amended) introduced the General Power of Competence which permits Councils to charge for discretionary services at a level that recovers the cost of delivery.

3.3 A number of changes are in the process of being rolled out within the department to modernise systems and processes to improve efficiency and productivity. These include the implementation of IDOX software for the service which took place earlier in the year. Alongside this, the implementation of charges for discretionary services would ensure that the Council have a planning service that is sufficiently funded by the people that use it, and that the Council supports the local community by processing applications in a timely manner. Further, carrying out discretionary services without passing any fee on to the users of those services slows down the Planning Department's ability to process and assess other applications due to the drain placed on Officer resources.

3.4 The majority of Councils across the country have or are making efforts to increase their commercial activity, and different approaches are being taken. A review of the discretionary services offered by other Councils has been undertaken to assist with this review and a benchmarking exercise against other Local Planning Authorities' charges for discretionary services has been provided at Appendix A. It is proposed to implement several operational changes including a series of new and amended discretionary Fees and Charges, that are projected to generate additional income for reinvestment in the service. The following report, in addition to Appendix A, sets out the details of all 9 proposed income streams.

3.5 Following Cabinet and Full Council approval, a detailed project plan would be developed to assist with the

implementation of the proposals, including producing the necessary material needed to advise service users of the new and amended Fees and Charges, and working with staff in the department to ensure they are fully briefed and trained on the new services. The work involved in preparing for the implementation of several new discretionary services has led to the proposal to implement the majority of the proposed Fees and Charges from 1st April 2027. The department will also work with the Finance Department to ensure that the Council's Central Fees and Charges Schedule is updated accordingly.

3.6 This report does not seek approval to make any changes to the existing staff structure, and no additional budget is required to implement the proposed operational changes.

4. Body of report and reason for recommendations

4.1 A review into the types of charges in place within the department has been carried out to ascertain whether any additional income can be generated by expanding the department's existing commercial operations, and in respect of introducing charges for the discretionary services it already provides free of charge.

Proposed New Fees and Charges

4.2 As a result of the review, it was clear that the department could expand its commercial operations. The following sets out the proposed operational changes which are proposed to be implemented by the Development Control Team:

1. Introduction of a chargeable fast-track application service;
2. Introduction of a chargeable invalid advice service;
3. Introduction of charges for requests for confirmation of compliance with obligations and conditions;
4. Introduction of charges for organisations and individuals to join and remain on the Council's self-build and custom housebuilding register;

5. Introduction of charges for processing amendments to submitted planning applications;
6. Introduction of charges for planning history searches and copies of the Sustainable Design and Construction Supplementary Planning Document 2020;
7. Introduction of an admin fee for processing postal and email planning application submissions.

Proposed Increases to Existing Fees and Charges

4.3 The review has also looked at the current Fees and Charges in place for discretionary services already provided. Increases to the existing charges in respect of the charge types listed below are also proposed for inclusion in the Council's Fees and Charges Schedule:

1. Increase of S106 Monitoring Fees;
2. Increase of planning document fees in respect of copies of decision notices (including appeals decisions and enforcement notices), approved/refused plans, S106 agreements, the Borough Plan, and other A1/A3/A4 planning application documents;
3. Increase of pre-application fees in respect of householder extensions and development, advertisements, permitted development, and non-residential development (less than 200sqm);

4.4 Full details of the above proposed operational changes and the associated charges are set out in full in the Income Generation Summary Paper (Appendix A). However, the below two tables provide a summary of all proposed changes:

Table 1: Summary of Proposed New Planning Fees and Charges	
Charge Type	Proposed Charge
Compliance with Obligations request	£240
Compliance with Conditions request	£65 for a householder extension request, £225 for all other requests
Fast-track Application Service Charges	
Householder planning applications (to include any associated listed building consent application)	£270
Lawful Development Certificates for Proposed Use (Householder only)	£135
Prior Approval Applications for Larger Homes Extensions	£135
Invalid Advice Service Charges	
Minor application	£110 per attempt
Small major application	£160 per attempt
Major application	£220 per attempt
All other application types not falling within the above categories	£50 per attempt
Self-Build and Custom Housebuilding Register Charges	
Fee to join the register	£40
Fee to remain on the register (annual subscription fee)	£20
Processing Amendments to Submitted Planning Applications	
Minor applications	£110 per amendment
Small Major applications without PPA in place	£140 per amendment
Major applications without PPA in place	£170 per amendment

Advertisement consent applications	£110 per amendment
All other application types not falling within the above categories	£110 per amendment
Other Proposed Charges	
Planning property history search Available in 5 working days	£40
Printed Copy of Sustainable Design and Construction Supplementary Planning Document 2020 Posted within 5 working days	£10 + £4.75 postage (residents) £20 + £4.75 postage (non-residents)
Admin Fees	
Admin Fees for Postal and Email Planning Application Submissions	£50 for postal applications £40 for email applications

Table 2: Summary of Proposed Increases to Existing Planning Fees and Charges

Charge Type	Existing Charge	Proposed Charge
S106 Monitoring Fees (also applicable to Unilateral Undertakings and Deeds of Variation)	£1,475.00 per agreement	£600 per non-financial head of term plus 5% of cost per Nuneaton and Bedworth Borough Council financial head of term
Decision notices (including appeal decisions) & enforcement notices Available in 5 working days	£12.00 electronic or £15.96 postal	£20 + £2.75 postage if posted
Copies of approved/refused plans (per set) or legal agreement Available in 5 working days	£2.89	£40 + £2.75 postage if posted

Printed Copy of Borough Plan Posted within 5 working days	£22.28 + £2.75 postage for residents. £36.42 + £2.75 postage for non-residents.	£25 + £4.75 postage (residents) £50 + £4.75 postage (non- residents)
A1/A3/A4 printed copies of other Planning Application Documents and Plans Posted within 5 working days	£1.39 (A3) £0.86 (A4) £2.89 (A1)	£5.00 (per A1 colour/black and white sheet) + £2.75 postage if posted £3.50 (per A3 colour/black and white sheet) + £2.75 postage if posted £2.00 (per A4 colour/black and white sheet) + £2.75 postage if posted
Pre-application Fees		
Householder Extension or Development	£168	£200
Advertisements	£180	£200
Permitted Development	£120	£230
Non-residential (less than 200sqm)	£168	£300
Postage rates are aligned with Royal Mail charges effective from October 2026.		

Estimated Annual Income

4.5 The total estimated annual income that could be generated by implementing all 9 proposed income streams would be at least £108,302.00, this is broken down in Table 3 below. It should be noted that this is an estimate and is dependent on the demand for the discretionary services introduced.

4.6 It should however be noted that the below Table does not account for the additional income that would be generated through implementing a S106 Monitoring Fee Schedule of Charges, charges for document requests, and charges for property history searches.

4.7 The income generated by S106 Monitoring Fees will entirely depend on the number of S106 legal agreements entered into in any given year, the number of obligations being secured under each agreement, in addition to the total NBBC financial contributions being secured. Whilst this cannot be predicted as each agreement is negotiated based on the specific nature of each development, the additional income to be generated is likely to be significant, this is because the proposal is to move away from the Monitoring Fees being charged for at present which are based on a flat fee charged on a 'per obligation' basis set at £1,475.00 per S106 legal agreement, and introduce a percentage based charging structure of 5% of the cost per Nuneaton and Bedworth Borough Council financial head of term, plus a £600 fee per non-financial head of term.

4.8 A worked example provided as part of Proposed Income Stream 6 (Appendix A) shows that the Council charged 4% of the Monitoring Fees that could have been charged in respect of strategic housing allocation HSG1 when compared to the Monitoring Fees now proposed. The total income generated is therefore likely to significantly exceed the estimated figure set out in Table 3 below.

Table 3: Estimated annual income to be generated from all 9 proposed income streams	
Proposed Income Stream	Estimated Annual Income
Proposed Income Stream 1 Charge for requests for compliance with planning conditions and planning obligations	£55,800
Proposed Income Stream 2	£12,690

Operate a fast-track planning service for householder-related applications	
Proposed Income Stream 3 Charging for an invalid advice service	£9,500
Proposed Income Stream 4 Charges for the self build and custom housebuilding register	£320, plus an additional £40 per new registration
Proposed Income Stream 5 Charges to amend submitted planning applications (excluding householder applications)	£27,150
Proposed Income Stream 6 S106 Monitoring Fee Schedule of Charges	Dependent on number of S106 agreements entered into
Proposed Income Stream 7 Charges for document requests and property history searches	Dependent on number of requests received
Proposed Income Stream 8 Charging an administration fee for postal and email applications	£1,480 - £1,850
Proposed Income Stream 9 Increasing Pre-application Fees	£1,362
Total:	At least £108,302.00

Setting Fees and Charges

4.9 The fees and charges proposed as part of this report have been calculated in line with the Council's Fees and Charges Policy - July 2025.

Price Reviews

4.10 Should the recommendations set out in this report secure approval by Cabinet and Full Council, the department will begin to roll out the operational changes and will adopt the use of time recording as standard practice. This will allow regular fee reviews to take place to assist with the Council's annual budget setting process.

4.11 The fees and charges proposed as part of this report will be subject to price reviews which are conducted annually for all services fees and charges in time to inform the budget setting process.

Notification of Charges

4.12 In line with the Policy, if the proposed Fees and Charges are approved by Cabinet and Full Council, the Council's existing webpages would be updated to ensure that all service users are made aware of the relevant fee that is payable in advance of accessing a particular discretionary service. The Fees and Charges would also be published at the point of sale of each service.

4.13 Service users will be given notice before the introduction of new and increased Fees and Charges from 1st April 2027. In respect of the increase to S106 Monitoring Fees, a period of 4 weeks' notice will be provided which is considered to be a reasonable period of notice in accordance with the Policy.

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

5.1 The Fees and Charges proposed in this report are proposed to be introduced from 1st April 2027, save for S106 Monitoring Fees which are proposed to be introduced from 1st January 2027. Consultation has taken place with the Council's Finance Team, the Council's Monitoring Officer, The Council's Legal Team and the Portfolio Holder for Planning, Enforcement and Public Services.

6. Financial Implications

6.1 The total estimated annual income that could be generated would be at least £108,302.00. This figure excludes any additional income that would be generated through increasing s106 Monitoring Fees which is likely to be significant.

6.2. The additional income generated through the proposed income streams would be used to invest in the department in order to deliver various service improvements and to create additional resource and capacity where needed.

7. Legal Implications

7.1. The Localism Act 2011 introduced the General Power of Competence which permits councils to charge for discretionary services at a level that recovers the cost of delivery. This however does not permit a local authority to charge for any services rendered to an individual for which it has a statutory duty to provide unless legislation permits a specific charge to be made. This report does not propose any charges in respect of services which the Council is mandated or has a statutory duty to provide.

7.2. The recommendations set out within this report will ensure that the charges or the increase of existing charges for discretionary services would be in accordance with the provisions of the Localism Act 2011 (as amended), as well as the provisions set out in Section 93 of The Local Government Act 2003 (as amended).

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. None.

10. Environmental implications

10.1. None.

11. Section 17 Crime and Disorder Implications

11.1. None.

12. Risk management implications

12.1. This report does not propose any charges in respect of services which the Council is mandated or has a duty to provide.

12.2. Any pre-application advice or fast-track service provided would not bind the Council in how it assesses any future planning application.

13. Human resources implications

13.1. Resources required to deliver the proposed fast-track service will need to be reviewed regularly by the Planning Manager – Development Control in response to the demand for the service.

13.2. It is not anticipated that additional resources in either the Planning Policy or Development Control Teams would be required to implement the suite of charges proposed in so far as they relate to discretionary services already being provided free of charge.

13.3. Consideration has been given to the capacity available for the Planning Manager – Development Control to roll any new services out in a timely manner and to prepare staff to undertake the work associated with the additional services being offered. An Income Generation Project Timetable would be prepared by the Planning Manager – Development Control, in consultation with the Assistant Director – Planning, which would ensure the delivery of any new services is sufficiently phased to ensure any additional workload is manageable.

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 its recommendations, the following option was identified. The reasons for its rejection are outlined below.

Option Ref	Option Title	Reason for rejection

A	To not proceed with the proposed income generation proposals or the implementation of the associated Fees and Charges.	Rejected – Not approving the proposed income streams and the associated Fees and Charges will not facilitate additional income generation for the Planning Department. In many cases, not approving the proposed income streams would result in the Development Control and Planning Policy Teams continuing to provide a number of discretionary services free of charge, or undercharging and not recovering the costs associated with providing the service.

17. Conclusion

17.1. That Cabinet approve the three recommendations set out in section 2 of this report.

18. Appendices

18.1. Please note the following appendices:

(i) Appendix A – Planning Income Generation Project Supporting Paper

19. Background papers

19.1. Please note the following background papers:

(i) Nuneaton and Bedworth Borough Council Fees and Charges Policy – July 2025

20. Report Writer Details:

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Appendix A – Planning Income Generation Project Summary Paper

Introduction

The following Income Generation Summary Paper sets out the details of the proposed 9 Income Streams, the service offer, as well as how the proposed Fees and Charges have been arrived at.

Proposed Income Stream 1: Charging for confirmation of compliance with obligations and/or conditions request

The Planning Department receives requests for confirmation that a developer has complied with a Section 106 Agreement for a particular property or development and requests to confirm that planning conditions have been complied with. Currently these requests are fulfilled free of charge by Planning Officers (including Principal Planning Officers and the Planning Manager Development Control), and the Technical Conditions Officer, and can be time consuming to respond to.

In line with Government Planning Fee Regulations, the Council can charge for confirming compliance with conditions and obligations. These fees help cover the costs of reviewing application files, and legal documents, and providing a written response.

There are a number of Councils across the country charging for compliance with conditions requests and compliance with planning obligations requests. The charges for these requests, together with the response targets, are set out in Appendix A of this report.

Income Generation

Requests relating to discharging conditions relating to householder applications are uncommon, however the Planning Department receives approximately 10 requests per month for all other application types. The Planning Department also receives approximately 10 compliance with obligation requests per month. The Planning Manager Development Control has estimated the work involved in delivering these two services and these calculations are provided at Appendix B.

The following fees and response targets are proposed:

Table 1: Proposed Fees and Response Targets		
Charge Type	Charge	Response Target
Compliance with Obligations request	£240	56 days (8 weeks)
Compliance with Conditions request	£65 for a householder extension request, £225 for all other requests	56 days (8 weeks)

Using £240 as a proposed fee for compliance with obligations requests would generate an income of approximately £28,800 per year. Using £225 as a suggested fee for compliance with conditions requests would generate an income of approximately £27,000 per year. These suggested fees broadly align with the charges imposed by the Councils listed in Appendix A.

Resources

It is not anticipated that any additional resource would be required within the department to resource this proposed income stream as this is a service that is already being provided by the department free of charge. It is considered necessary to update the website with information relating to the proposed charges and set out when the new charges would come into effect.

Outcomes

Charging for requests for confirmation of compliance with obligations and/or conditions could generate an additional approximate annual income of £55,800 per year.

Recommendations

It is recommended that the Planning Department begin to charge for requests for compliance with planning conditions and planning obligations (a “compliance with conditions or obligation request”) in line with Table 1 above.

Proposed Income Stream 2: Implementation of a Fast-Track Application Service

The following proposal is for the implementation of a new initiative in the Planning Department to fast-track certain key planning applications from initial submission to planning decision by providing a seamless service and cutting through unnecessary delays.

The proposal seeks to raise additional income but would also assist applicants and developers in being able to deliver projects quicker and with more certainty by delivering an efficient and fast-tracked process for the determination of certain planning applications.

The evidence base to support this proposed income stream is set out in Appendix C of this report.

Proposed Service Offer

The proposal seeks approval to roll out a fast-track service for the most minor types of application. The following types of applications have been identified for the fast-track service:

- Householder Planning Applications;
- Applications for Listed Building Consent where they accompany a Householder Planning Application;
- Prior Approval Applications for Larger Homes extensions; and,
- Certificates of Lawfulness for Proposed Use (householder only).

Householder-related applications such as those listed above lend themselves to a fast-track service since the developments subject to these applications tend to be of a simpler nature and rarely require the involvement of statutory consultees. For Certificates of Lawfulness, no consultation is required as the outcome is based on compliance with criteria set out within legislation, so a decision could be made quicker than 28 days where that becomes feasible. Furthermore, it is not possible to call a Certificate of Lawfulness application to Planning Applications Committee, so this will not require a change to the Scheme of Delegation.

In addition, validation of these applications tends to be straightforward and therefore the administration of the proposal can be accelerated. Once any statutory consultation with neighbours has been carried out, the majority of Householder, Certificates of Lawfulness and Prior Approval applications for Larger Homes Extensions can be determined within a 4-week period.

Fast-track charges would be payable in addition to the application fees payable under the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (as amended).

The Planning Department will require applications for fast-tracking an application to be received the same day as the planning application has been submitted, regardless of how the application is submitted to the Council. Paying a fast-track fee will not guarantee an approval of any application.

The below table outlines the proposed delivery of a fast-track service according to each stage:

Table 2: Proposed Delivery of a Fast-track Service

	Stage 1: Registration and Validation	Stage 2: Site Visit	Stage 3: Review and Recommendation	Stage 4: Decision
Traditional Service	Up to 4 days	Up to 4 weeks	Up to 8 weeks	Decision made within 8 weeks or within 42 days for Prior Approval applications for Larger Homes Extensions
Fast-track service – Householder Applications and any accompanying Listed Building Consent application	1 day	5 days	22 – 26 days	Decision made within 28 days (a reduction of 4 weeks compared to the traditional service)
Fast-track service – Lawful Development Certificates and Prior Approval applications for Larger Homes extensions	1 day	5 days (only where needed)	10 – 20 days	Decision made by 28 days (a reduction of 2 weeks for Prior Approval Applications for Larger Homes Extensions and a

				reduction of 4 weeks for Lawful Development Certificates compared to the traditional service)

Decision Targets

It is important to note that the fast-track applications would need to maintain the statutory consultation periods for stakeholders, including neighbours. Where a householder planning application and any associated listed building consent application is 'called in' by a member for consideration by the Council's Planning Applications Committee, the Planning Department would not guarantee that the fast-track timeframe will be met, and this would be communicated to applicants on the Council's website. In this scenario, the fast-track fee would not be refundable.

In the event of not being able to meet the fast-track determination target, to include cases where a small extension of time has been agreed (where required due to information needed from the applicant for example, or where an objection from a statutory consultee needs to be addressed), the fast-track element of the fee would not be refundable.

The fast-track proposals will affect the Scheme of Delegation, i.e. the timescales for applications to be referred to the Planning Applications Committee. In order to provide a fast-track service for householder planning applications and any associated listed building consent application, the time period provided to members to call-in an application would need to be reduced from 28 days to 21 days of the date of the relevant weekly list of planning applications being published.

An alternative option is to offer a fast-track service decision within 35 days to enable the 28 day member call-in to remain, however this would only provide a 3 week reduction to the existing 8 week statutory determination period which would not be a particularly attractive reduction in time for those seeking a fast-track option.

The fast-track service will not be made available for any Members or Officers of the Council, as applications submitted by Members and Officers of the Council are automatically determined by Planning Applications

Committee. This would be communicated to applicants on the Council's website.

It is not considered that any consultation is required with stakeholders given the statutory consultation period of 21 days would remain and all parties would still have an opportunity to participate in the process.

Income Generated

The Council currently receive an average of 200 householder applications, 50 householder-related Lawful Development Certificates for Proposed Use, and 20 Prior Approval applications for Larger Homes Extensions per year.

The proposed charges for a fast-track service have been established based on charging approximately 50% of the cost of the associated planning application fee.

It is difficult to gauge what share of the market a fast-track service would attract, however if 20% of the existing identified applications were to use a fast-track service, this could generate the below income per annum:

Table 3: Proposed Fast-track Service Charges

Application Type	Proposed Charge	Additional Estimated Income per annum
Householder planning applications (to include any associated listed building consent application)	£270	£10,800
Lawful Development Certificates for Proposed Use (Householder only)	£135	£1,350
Prior Approval Applications for Larger Homes Extensions	£135	£540
		Total: £12,690

The income to be generated would ultimately depend on the marketing of the service, the quality and timeliness of the service offered, and the resources in the department to be able to deliver the service.

Resources

Providing a fast-track service for applicants will require efficient processes and effective time and project management, as well as monitoring. It is

anticipated that this will be covered within the current staffing levels of the department by focussing a proportion of Planning Officer time on managing fast-track applications.

The operation of a fast-track service is considered to be achievable for the department given the minor nature of the proposals the fast-track service would apply to. The Officers involved in the delivery of the service would be at Planning Officer level and the demands associated with its delivery would not therefore affect the processing and assessment of other more complex applications, or applications of strategic importance.

In the longer term, if demand for the service increases significantly, there may be additional staff required to meet the demand, however this can be considered and addressed by the Planning Manager Development Control at a later date.

It is anticipated that minimal resources will be required to set the service up, these resources include producing a fast-track application form, creating an associated webpage setting out the Council's charges and the process, producing a communications update to introduce the service, and implementing a change to the existing process when applications are submitted to flag fast-tracked applications.

It will be important that the Planning Department reserve the right to refuse fast-track requests subject to resources and availability and this would be communicated to applicants on the Council's website.

Reviewing and Monitoring the Service

The tracking and monitoring of fast-track applications will be a key component to the project's success and will rely on the Planning Manager Development Control to manage this effectively. It will be important to collate data on the numbers of fast-track applications received, the time taken to determine each one, and the fee income received as a result of the service. In addition, customer feedback should be taken into consideration and amendments to the processes actioned by the Planning Manager Development Control where and when necessary. Operation of the service will also depend on capacity and resource within the team, and the service will be reviewed by the Planning Manager Development Control, with the service paused temporarily if it cannot be delivered for a specific reason.

Feedback should be sought by the Planning Manager Development Control from Members with regard to the proposal to amend the call-in time for householder applications and any associated listed building consent application.

Outcome and Recommendations

It is recommended that a fast-track planning service be rolled out in line with the above Proposed Delivery of a Fast-track Service and Fast-track charges set out in Tables 2 and 3 above.

Proposed Income Stream 3: Implementing an Invalid Advice Service

The majority of planning applications received by the Planning Department are incorrect (known as 'invalid') upon submission. An invalid application is an application submitted to the Planning Department that is missing information the department needs to assess the application. In these scenarios, the Planning Department currently assist the applicant in an attempt to make the application valid.

It is difficult to gauge what percentage of planning applications received by the Planning Department are invalid upon submission as this is not data which is captured by the department's planning software. However, the Planning Portal has reported that an average of 50% of planning applications are invalid[1]. The work associated with processing this percentage of invalid planning applications results in a drain on officer time also slows down the processing and assessment of other valid applications.

Other councils have implemented an 'invalid advice service' which is a paid for service designed to cover officer time associated with assisting applicants in correcting applications so that they can be made valid. Implementing invalid advice service fees can help to address poor quality applications and can act as a deterrent, encouraging applicants to ensure their applications are well thought through and valid at the point of submission.

A review of fees charged by other authorities who have implemented an invalid advice service has been undertaken. The evidence base to support this proposed income stream is set out in Appendix D of this report.

[1] Source: https://blog.planningportal.co.uk/2023/03/30/addressing-invalidation-due-to-location-plan-errors/

Potential Service Offer

If a planning application is invalid upon a review undertaken by a Planning Officer, the Planning Officer will contact the applicant to let the applicant know why the application is invalid. At this point, the applicant can decide to withdraw the planning application which will mean the Planning Officer will let the Planning Portal know to issue the applicant a refund (where the applicant has submitted the application via the Planning Portal). In cases where an applicant has submitted their application directly to the Council via email or post, a refund could be refunded, less an administration charge, set at 10% of the planning application fee, to cover the Council's time for having reviewed the application.

Alternatively, the applicant can choose to use an optional paid for invalid advice service where the Planning Officer will assist the applicant in correcting the application so that it can be made valid. Where the invalid advice fee is not paid, and the application is not withdrawn by the applicant, the Planning Department will return the application to the applicant within 28 days of receipt, less an administration charge, set at 10% of the planning application fee, to cover the Council's time for having reviewed the application.

Income Generated

Appendix D shows that, based on the fees charged by 7 authorities, the average invalid advice fee for major applications is £231, for minors is £131, and for householders/all other applications it is £66. However, there are some relatively low fees charged by Tewkesbury Borough Council which bring these averages down.

The table below sets out the proposed fees for this service by application type:

Table 4: Proposed Invalid Advice Fees

Application Type	Description	Invalid advice fee per attempt	Maximum attempts before withdrawal
Householder application	Householder applications, listed building consent applications relating to dwellinghouses, and	£0	Two

	Certificates of Lawfulness relating to dwellinghouses		
Minor application	Up to 9 dwellings and up to 0.99 hectares or 999 square metres floor area.	£110	Three
Small major application	Between 10 and 199 dwellings and between 1.9 and 3.9 hectares or 1,000 and 9,999 square metres floor area.	£160	Three
Major application	200+ dwellings and over four hectares or 10,000 square metres floor area.	£220	Three
All other application types not falling within the above categories	E.g. Advertisement Consent	£50	Three

Assuming that only 25% of all applications received in the above categories utilise the invalid advice service one time, this could generate an estimated annual income of £3,410 (minor applications), £800 (small major applications), £440 (major applications), and £4,850 (all other application types). These figures are based on the number of planning applications received in the last 12 months[2].

Resources

It is not anticipated that any additional resource would be required to implement this service as processing amended plans is work that is already undertaken by Planning Officers for all types of application. In addition, the department does not have an adopted amendments policy which would support officers to reject the submission of amended plans.

Outcomes and Recommendations

It is recommended that householder applications are not charged invalid advice fees. A maximum of two attempts to make the application invalid

[2] The total number of planning applications received in the last 12 months is 735. This is made up of 243 householder applications, 125 minor applications, 18 small major applications with no PPA, 9 major with no PPA, 16 advertisement consent applications, and 324 applications not falling within these categories.

before the Planning Department requires the application to be withdrawn is recommended to be adopted. This is in order to ensure that the Council's resources required in assisting with invalid householder applications are not unreasonably drained.

It should be noted that a decision to not pass these charges onto those applicants of householder planning applications would accord with the provisions of section 93(5) of the Local Government Act 2003 (as amended) which sets out that a relevant authority may set charges as it thinks fit and may, in particular charge only some persons for providing a service. The same section of the Act also allows a relevant authority to charge different persons different amounts for the provision of a service. This approach also accords with the Council's Fees and Charges Policy (2025).

It is recommended that the Planning Department implement an invalid advice service applying the fees and maximum attempts set out at Table 4 above.

Proposed Income Stream 4: Fees to those who apply to be entered on or to remain on the Self-Build and Custom Housebuilding Register

Responsibility for keeping a self-build and custom housebuilding register falls to "relevant authorities" as set out in section 1 of the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016). The Council therefore keeps a register of people who are interested in delivering self-build or custom build projects in the Borough.

The Government's guidance on self-building and custom housebuilding states that relevant authorities can charge fees to those who apply to be entered on or to remain on their register. The guidance makes it is clear that this should be on a cost recovery basis.

Many councils now charge for this service. The evidence base to support this proposed income stream is set out in Appendix E of this report.

Proposed Charges

When reviewing the fees charged by other authorities, the average fee charged for processing new registrations is £90.90, and the average fee charged to remain on the register is £37.50. The following proposed

charges are considered to be proportionate and would align with fees charged by other authorities.

A calculation of officer time spent on delivering these two services has been undertaken and the below charges are proposed based on that exercise.

Table 5: Proposed Self-Build and Custom Housebuilding Register Charges	
Fee to join the register	£40
Fee to remain on the register (annual subscription fee)	£20

How the charges would work

It is proposed that where an application is received from an association of individuals, each member of the association must pay the fees to join and remain on the register.

It is proposed that the annual subscription fee would be payable by 30 October (end of each self-build base period) each year. This would allow those individuals or organisations to be included on the register for the following base period (starting 31st October each year).

It is proposed that, if payment is not made within 28 days of a request being made to be added to the register, or within 28 days of the council contacting an individual or organisation requesting confirmation that they wish to remain on the register, then those individuals or organisations will either not be added to the register, or will be removed from the register, as appropriate. This would be clearly communicated on the Council's self-build and custom housebuilding webpage and in the communication sent out to existing individuals or organisations who are on the register.

Income Generation

Currently the Council's register includes 16 registrations (last base period the register included 40 registrations). As such, the proposed fees to remain on the register could have generated £320 (based on a fee of £20 and 16 registrations which were carried over to this current base period which started on 31st October 2025).

Any new registrations requests would generate an additional £40 per registration, in addition to any associated future annual subscription fees.

Whilst the registration numbers are currently relatively low for this current base period, other councils have experienced surges in the number of requests received from individuals and organisations to join the register, and should this happen at NBBC, there would be no fees in place to cover the additional work this surge would generate.

Having reviewed the number of entries (or 'registrations') included on the Government's latest Right to build register (2016 to 2023-24) over the last 5 monitoring years (monitoring years 2019 – 2020 and 2023 – 2024), the number of new entries to the register varied from between 1 and 11. Therefore, the income generated from new registrations, based on historical new entries to the register, may vary between £40 and £440. Fees to be generated as a result of individuals or groups wishing to remain on the register will wholly depend on whether those individuals and groups express an intention to remain on the register once approached by the Council. This cannot be predicted; however, it is noted that the Council have not reported any entries being removed from the register historically.

Resources

It is not anticipated that any additional resource would be required within the Planning Policy Team to implement this service as this is work which is already being delivered by the team free of charge.

Outcome and Recommendations

Whilst this potential income stream would generate a relatively low annual income, as this work is already being carried out by the team, and given there would be no extra resource required for its operation, it is recommended that the Planning Policy Team implement the charges set out within Table 5 above.

Proposed Income Stream 5: Charge Fees for Proposing Amendments to Planning Applications

The submission of amendments to planning applications requires the Planning Department to carry out additional work that an applicant has not paid for, from re-validating plans, through to reconsulting with neighbours and stakeholders on amended plans. This extra work demands additional officer time and additional letters being sent in the post to neighbouring properties which are costs currently being absorbed by the Council.

Once an applicant has submitted a planning application, the Council are not legally obliged to accept any amendments to the plans or documents which accompany that application. As such, allowing the submission of amendments to change or alter an application in a way that improves the quality of the development, overcomes a potential reason for refusal, or addresses the concerns of the case officer, consultees or local residents, is a discretionary service provided by the Council that can be charged for.

A number of authorities already charge for this service. The evidence base to support this proposed income stream is set out in Appendix G of this report.

Proposed Charges

The Planning Department receives an average of 50 major planning applications per year. Amended plans submitted in respect of major planning applications are generally the most time consuming for Planning Officers to process and the most costly to the Council in terms of the number of neighbour notification letters which are required to be posted. However, amendments to all applications require officer and administrative time to process which are costs currently being absorbed by the Council.

The least onerous form of amended plans to process are those associated with householder planning applications. It is therefore suggested that no fee is charged for those applicants of householder planning applications wishing to submit amended plans for consideration. This is also considered to be a proposal which would be more supportable ensuring that further costs are not passed on to residents of the Borough. In order to reduce the costs incurred by the Council, it is proposed that a 'Negotiating on Submitted Planning Applications Protocol' is prepared by the Planning Manager Development Control and presented for adoption which would support the introduction of the proposed fees and the new approach in respect of limiting the maximum number of amendments that can be made by applicants before requiring a new planning application to be submitted.

The following charges are proposed for processing amended plans for each application type.

Table 6: Potential Charges for Processing Amendments to Submitted Planning Applications		
Application Type	Fee charged per amendment	Maximum number of

		amendments accepted before application proceeds to determination
Householder applications	No charge	1
Minor applications	£110	3
Small Major applications without PPA in place	£140	Case by case basis
Major applications without PPA in place	£170	Case by case basis
Advertisement consent applications	£110	3
All other application types not falling within the above categories	£110	Case by case basis

Proposed Process

When a Planning Officer notifies an applicant that they need to pay an amendment fee if they wish to amend their plans, they can choose to either withdraw their application at that point, or have their ‘as submitted plans’ assessed, with a decision made based on the originally submitted plans. An internal process would be set up by the Planning Manager Development Control to ensure the amendment submission process is operated efficiently.

Income Generation

It is difficult to gauge exactly how many planning applications are amended as this is not data which is currently collated by the Development Control Team, however, the Planning Manager Development Control has estimated that all minor and all major planning applications submitted for consideration will be amended by the applicant. The number of times an application is amended is also estimated to be anywhere between 1 – 30 times for major planning applications and 1 – 10 times for minor planning applications. Therefore, the team are currently spending a significant

amount of time on accepting, processing, consulting on, and assessing amendments to submitted planning applications.

Assuming at least every major and every minor planning application received would be amended at least once, the above charges, when based on the application numbers received over the last 12 months[3], could generate an estimated annual income of £13,750 (minors) and £4,050 (majors). Assuming that only 25% of submitted advertisement consent applications and 'all other application types' (see footnote 3) would be amended once, this could generate an estimated annual income of £9,350. These estimated figures are considered to be conservative and are based on only one amendment being charged and only a 25% amendment rate for advertisement consent applications and 'all other application types.' It is therefore considered that charging for processing amended plans could generate significantly more income than the figures estimated above.

Outcomes

Carrying out discretionary services without passing any fee on to the users of those services slows down the Planning Department's ability to process and assess other applications due to the drain placed on officer resources. The implementation of a charge for submitting amended plans may encourage more applicants to utilise the pre-application service so that their proposals are supportable upon submission without the need for the submission of amended plans. Introducing a charge for the submission of amendments would likely avoid continuous changes to designs throughout the process, often triggering repeat and costly consultation exercises for the Council.

Recommendations

It is recommended that the Planning Department implement fees for applicants where they are proposing to submit amendments to planning applications as set out in Table 6 above. It is proposed that this fee excludes householder planning applications and all other householder-related applications, such as Certificates of Lawfulness, or listed building consent applications relating to dwellinghouses.

[3] The total number of planning applications received in the last 12 months is 735. This is made up of 243 householder applications, 125 minor applications, 18 small major applications with no PPA, 9 major with no PPA, 16 advertisement consent applications, and 324 applications not falling within these categories.

In order to reduce the costs incurred by the Council, it is proposed that a 'Negotiating on Submitted Planning Applications Protocol' is prepared by the Planning Manager Development Control and presented for adoption which would support the introduction of the proposed fees and the new approach in respect of limiting the maximum number of amendments that can be made by applicants before requiring a new planning application to be submitted.

Proposed Income Stream 6: Section 106 Agreement Monitoring Fees

The completion of a planning obligation involves the Council in various administrative/monitoring work, which has a cost. This work is directly related to S106 agreements, which are themselves necessary to enable development.

The Community Infrastructure Levy (Amendment) (England) (No.2) Regulations (2019) ("The Regulations"), enables local planning authorities to charge a fee for the cost of monitoring in relation to the delivery of planning obligations in S106 agreements.

The Regulations state that such monitoring fees can be sought where:

- the sum to be paid fairly and reasonably relates in scale and kind to the development; and
- the sum to be paid to the authority does not exceed the authority's estimate of its cost of monitoring the development over the lifetime of the planning obligations which relate to that development.

The Government's Community Infrastructure Levy Guidance[4] states that fees could be a fixed percentage of the total value of the Section 106 agreement or individual obligation; or could be a fixed monetary amount per agreement obligation (for example, for in-kind contributions). It states that authorities may decide to set fees using other methods. However, in all cases, monitoring fees must be proportionate and reasonable and reflect the actual cost of monitoring. It also states that authorities could consider setting a cap to ensure that any fees are not excessive.

[4] Paragraph: 180 Reference ID: 25-180-20190901

Current Fees

The Monitoring Fees being charged for at present are based on a flat fee charged on a 'per obligation' basis set at £1,475.00 per S106 agreement. This fee is charged regardless of the number of obligations/triggers or funds included within a legal agreement. This is a charging structure which fails to reflect the costs associated with monitoring the more complex legal agreements on larger sites which will have a number of obligations and various triggers.

Proposed S106 Monitoring Fee Schedule of Charges

Whilst a significant amount of strategic development has been consented in the Borough in recent years which have been subject to relatively low monitoring fees, there are still large-scale developments coming forward which will include complex and significant S106 agreements. It is therefore proposed that the authority introduces a S106 Monitoring Fee Schedule of Charges which would secure a proportionate fee for monitoring of S106 Agreements.

The following sections of this report are focused on the work which has been undertaken in order to produce a S106 Monitoring Fee Schedule of Charges.

Methods for calculating monitoring fees

As there is no set formula or guidance on how to set the fees, local planning authorities are required to establish their own charging regime and to justify the monitoring fees for S106 agreements. The Council needs to justify the costs of monitoring S106 agreements to meet the requirements of the national guidance, ensuring any charges are *'reasonable and proportionate.'*

To ensure the Council proposes monitoring fees for S106 agreements which are proportionate and reasonable, a benchmarking review of how other councils charge has been undertaken. This review, outlined in Appendix H of this report, shows that a variety of methods have been adopted and this highlights a varied approach to setting monitoring fees for planning obligations in line with guidance.

The following charging options have been considered:

1. Based on percentage value of the total amount secured in the agreement - this may be the most fair method of ensuring

proportionality of monitoring fees to the value and complexity of an agreement. The fees would also be easy to translate commuted payments into an appropriate monitoring fee. This method also lends itself to the principle that larger scale developments (i.e. those developments generally subject to the largest amount of funds being secured) tend to have a greater number and complexity of obligations within an agreement. The use of a percentage linked to the total funds secured would require a monitoring fee to be set for non-financial obligations.

2. Based on the number of obligations within each agreement – each S106 agreement will include one or more obligation on the developer. Some obligations are easier and quicker to monitor than others, and whilst using the number of obligations within an agreement is one method that could be used, it may not capture the range of complexities that may arise in the monitoring of each obligation. It therefore cannot be guaranteed that this method of calculating monitoring fees would be proportionate and fair.
3. Based on the scale and nature of the proposals – monitoring fees based on the nature and scale of development would result in a set of fees based on a scale of development and the nature of each obligation. This could relate to the number of dwellings. It is however considered that this method may not capture the costs associated with monitoring complex obligations within an agreement.

Proposed Fees

The preferred method of charging for S106 monitoring is adopting a fee based on the percentage of total funds secured. A 5% monitoring fee is a well-used percentage and is equal to the maximum administration fee which can be charged by CIL charging authorities to help cover administration of the Levy, which includes its monitoring.

Whilst NBBC is not a CIL charging authority, it is recognised that both CIL and S106 planning obligations are subject to formal, legislative requirements on what is collected, how much is spent and what it has been spent on, reported through an annual Infrastructure Funding Statement. Together with the list of what monitoring involves (see below 'Staffing and Resources' section) they carry similar resource implications for the Council. In this sense, setting the same fee (where it relates to a financial contribution) is considered to be fairly and reasonably related in scale and kind to the development, in line with the CIL Regulations. It is considered

that a fixed percentage would automatically scale the fee charged to ensure compliance with the CIL Regulations.

In terms of non-financial planning obligations, it is considered that a set fee of £600 per obligation would be fair amount in comparison to fees charged by other authorities in the benchmarking exercise which has been undertaken (see Appendix H).

The proposed monitoring fees are therefore set out below:

- £600 per non-financial head of term (outside the scope of VAT)
- 5% of cost per Nuneaton and Bedworth Borough Council financial head of term (outside the scope of VAT)

These proposed fees are considered to be consistent with the monitoring fees being charged for by Merton London Borough Council, Spelthorne Borough Council, Surrey Heath Borough Council, London Borough of Hillingdon and Havant Borough Council who all adopt a 5% monitoring fee based on the total financial funds secured. Rushmore Borough Council charges a 7.5% monitoring fee based on the total financial funds secured. A number of Councils have chosen to introduce a cap to the monitoring fee to be secured, however introducing a cap is not recommended as this would not reflect the work required in monitoring complex legal obligations, nor would it result in monitoring fees which are proportionate across a range of large scale developments.

Income Generated

Income from the introduction of the S106 Monitoring Fee Schedule of Charges will vary year on year, as it will be driven by the planning applications received and the size/infrastructure requirements of those permitted developments.

However, in order to provide an illustration of the additional income which could be secured, the monitoring fees secured in respect of a consented strategic allocation have been reviewed. Using the consented HSG1 allocation as an example which related to the development of the site for at least 4,419 dwellings, the Council secured a total of £13,410.00 in monitoring fees across the total number of planning applications relating to this allocation[5]. Adopting the proposed monitoring fees in this report (i.e. 5% of total NBBC funds secured with no cap, plus a flat fee of £600 per

[5] Application reference numbers 033758, 035279, 034076, 034615, 036873, 032336, 032438, 032578, 032992 and 031741.

non-financial obligation) would have yielded at least £328,891.77 in monitoring fees which works out at just £74.42 per dwelling based on a total of 4,419 dwellings being built out. The breakdown of this calculation is provided in Appendix N.

The above worked example shows that the Council charged only 4% of the monitoring fees that could have been charged in respect of strategic allocation HSG1. Any additional revenue generated could be used to fund staff resource and associated equipment and software (Exacom monitoring software for example) to proactively monitor and report on planning obligations and the associated costs.

Outcomes

The introduction of the S106 Monitoring Fee Schedule of Charges aims to enable the authority to recover its costs in monitoring future S106 agreements. The fees have been based on a fixed 5% of each Nuneaton and Bedworth Borough Council financial head of term (outside the scope of VAT). A fixed fee of £600 per non-financial head of term is also proposed. The fees have been benchmarked against the fees that other local authorities are charging (Appendix H).

It is considered that the proposed method of setting the monitoring fees outlined in detail in this report will provide the best balance between ensuring that the authority recovers associated monitoring costs whilst being simple to apply and administer and compliant with the requirements of the CIL Regulations.

Recommendations

It is recommended that the Development Control Team implement the S106 Monitoring Fee Schedule of Charges per 'head of term' as allowed by The Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019. It is recommended that the fees are based on a fixed 5% of each Nuneaton and Bedworth Borough Council financial head of term (outside the scope of VAT). A fixed fee of £600 per non-financial head of term is also recommended. The fees would also be applicable to Unilateral Undertakings and Deeds of Variation.

It is recommended that the monitoring fees are payable immediately on completion of the S106 agreement as a one-off payment to ensure funding is available to resource the monitoring of agreements from the outset. It is

however recommended that consideration be given to developers making staged payments of the monitoring fee for large scale development which would be considered by the Planning Officer in consultation with the S106 Agreement Monitoring Officer.

The charges for monitoring planning obligations will remain separate from the authority's legal costs for drafting and signing S106 agreements, which will remain independently recovered by Legal Services.

It is recognised that the timing of introducing the S106 Monitoring Fee Schedule of Charges is an important consideration. There are a number of S106 agreements currently being negotiated for applications which are at various stages of development. Introducing a new financial obligation for those developments without sufficient lead-in could adversely affect the target time for planning decisions and could have a bearing on the delivery of development. It is therefore recommended that the monitoring fees set out in the S106 Monitoring Fee Schedule of Charges, subject to securing Cabinet approval, take effect four weeks after obtaining Cabinet approval. The charges would therefore be applied to all affected planning applications which are granted planning permission after that date, including all S106 legal agreements which have not yet been signed and sealed.

The S106 Monitoring Fee Schedule of Charges should be reviewed annually to ensure that the fees collected reflect the true monitoring costs.

It is recommended that both the Development Control Team and Legal Services actively check the monitoring fees which are being drafted in legal agreements to ensure that they accord with the Council's most up to date Fees and Charges Schedule.

Proposed Income Stream 7: Charges for document requests and property history searches

The Planning Department receives requests from a range of individuals and organisations for the release of planning documents. The fees currently charged by the Planning Department for this service are set out in Appendix M.

A review of other fees charged by other authorities is set out in Appendix I of this report.

Proposed Service and Charges

The below table sets out the proposed service and the charges proposed to be implemented. The proposed charges reflect the workload demand associated with responding to the requests. A number of these services are already provided by the department, however the fee for these services are proposed to be increased.

Table 7: Proposed charges

Service	Response Target	Current Charge	Proposed Charge
Decision notices (including appeal decisions) & enforcement notices	Available in 5 working days	£12.00 electronic or £15.96 postal	£20 + £2.75 postage if posted
Planning property history search	Available in 5 working days	N/A	£40
Copies of approved/refused plans (per set) or legal agreement	Available in 5 working days	£2.89	£40 + £2.75 postage if posted
Printed Copy of Borough Plan	Posted within 5 working days	£22.28 + £2.75 postage for residents. £36.42 + £2.75 postage for non-residents.	£25 + £4.75 postage (residents) £50 + £4.75 postage (non-residents)
Printed Copy of Sustainable Design and Construction Supplementary Planning Document 2020	Posted within 5 working days	N/A	£10 + £4.75 postage (residents) £20 + £4.75 postage (non-residents)
A1/A3/A4 printed copies of other Planning Application Documents and Plans	Posted within 5 working days	£1.39 (A3) £0.86 (A4) £2.89 (A1)	£5.00 (per A1 colour/black and white sheet) + £2.75

			postage if posted £3.50 (per A3 colour/black and white sheet) + £2.75 postage if posted £2.00 (per A4 colour/black and white sheet) + £2.75 postage if posted

Income Generation

It is difficult to estimate the additional income which could be generated by implementing and increasing charges associated with document requests and property history searches as the number of requests received is not data which is currently monitored by the department. However, it is considered that where the service is already being provided, the fees charged would need to be increased to account for the cost of providing the service.

Resources

No additional resource would be required within the Council to implement these charges as the administrative work associated with responding to these requests is already being carried out by the Planning Department, and in some cases the Admin team, free of charge. Work would be required to update the Council's website to provide transparent rationale as to why the charges are being implemented.

Outcomes and Recommendations

That the Development Control Team implement charges, and increases to existing charges, for document requests and property history searches in line with Table 7 above.

Proposed Income Stream 8: Charge admin fees for postal and email application submissions

The Planning Portal implements a service charge for planning applications that attract a planning fee of over £100 of £70.83. The fee partly covers the cost of providing the service, but also providing free-to-use content and interactive guidance on the website

Surrey Heath Borough Council charge a £100 admin fee (inclusive VAT) for postal applications and £50 admin fee (inclusive of VAT) for email applications to account for the additional work associated with scanning hard copies of applications and manually inputting information into planning software which is an automated process where the Planning Portal is used.

The introduction of a charge would encourage more applicants to utilise the Planning Portal which is a streamlined service and one which places fewer administrative demands on the Planning Department.

Proposed Fees

The admin fee proposed is £50 for postal applications and £40 for email applications.

Income Generation

It is difficult to estimate the additional income which could be generated by implementing an admin charge for postal and email application submissions as the number of postal and email planning applications received by the department is not data which is currently monitored by the department. However, the Planning Manager Development Control has estimated that around 5% of applications received are submitted via email or post. Based on 5% of the number of planning applications received in total over the last 12 months being charged an admin fee of between £40 - £50, this proposed income stream could generate an additional annual income of between £1,480 - £1,850.

Resources

No additional resource would be required within the Council to implement this charge as the administrative work associated with processing postal and email submissions is already being carried out by the Planning Department and Admin team free of charge. Work would be required to update the Council's website to provide transparent rationale as to why the charges for email and postal submissions are being implemented and how the charges can be avoided by the customer.

Outcomes and Recommendations

That the Development Control Team implement a £50 admin fee for postal applications and £40 admin fee for email applications to account for the additional work associated with scanning hard copies of applications and manually inputting information into planning software.

Proposed Income Stream 9: Increasing Pre-application Fees

The estimated resource demands associated with delivering the existing pre-application service have been reviewed by the Planning Manager Development Control. A review of the existing pre-application fees charged by other authorities against the estimated resource demands arising from each pre-application development type has been carried out by the Planning Manager Development Control. The evidence base to support this potential income stream is set out in Appendix L of this report.

Appendix L shows that a number of pre-application fees charged do not cover the estimated costs associated with resourcing the service in respect of providing pre-application advice on the following four pre-application advice categories; householder developments, permitted development, advertisements, and non-residential (less than 200sqm).

Proposed Fees

The following table sets out the proposed pre-application fee increases for the four pre-application categories which would be required to cover the costs incurred by the Council in providing advice in respect of these pre-application enquiries.

Table 8: Proposed Increase in Pre-application Fees			
Pre-application Advice Category	Current Fee	Proposed Fee	Fee Increase of
Householder Extension or Development	£168	£200	£32
Advertisements	£180	£200	£20
Permitted Development	£120	£230	£110
Non-residential (less than 200sqm)	£168	£300	£132

Income Generated

Taking into account the pre-application requests that have been received within the last 12 months[6], the fee increases for the above would generate an estimated £1,364 in extra income per annum.

Resources

No additional resource would be required within the Council to implement these increased pre-application fees.

Outcomes and Recommendations

A number of pre-application fees charged do not cover the estimated costs associated with resourcing the service in respect of providing pre-application advice on four types of development. It is recommended that the Planning Team increase the pre-application fees for those four development types in accordance with Table 8 above.

Resources Required

A number of the proposed income streams would be generated through proposed services which are not already being delivered by the Development Control department. As such, the responsibility for rolling out any new services would fall to the Planning Manager – Development Control. There would also be a requirement for the Planning Manager – Development Control to prepare guidance material, both or internal purposes and for the Council's website (for example a Guidance Note and

[6] 24 Housholder Extension or Development pre-application requests, 0 Advertisements pre-application requests, 3 Permitted Development pre-application requests and 2 Non-residential (less than 200sqm) pre-application requests were received in the last 12 months

Fee Guide), and to sufficiently brief all staff involved in the work required in the delivery of these services.

It is also important to note that the implementation of a Fast-Track Planning Service will require a shift to a more commercial approach in the department and help and support should be provided to all staff involved in the delivery of this service to ensure that they understand and think about the level of service required and the requirements of the customer.

It is recommended that an Income Generation Project Timetable be prepared by the Planning Manager – Development Control, in consultation with the Assistant Director – Planning, which would ensure that the delivery of any new services is sufficiently phased to ensure any additional workload is manageable. The broad recommendation would be to begin work on rolling out those services which would yield the most income for the Council first (i.e. Proposed Income Stream 6: Section 106 Agreement Monitoring Fees).

Appendices List

Appendix A – Authorities Charging for Compliance with Obligations and/or Conditions Requests and Proposed NBBC Fees and Response Targets

Appendix B – Proposed Fees for Compliance with Obligations and/or Conditions Requests

Appendix C – Authorities Offering a Fast Track Service

Appendix D – Authorities Charging for Processing Invalid Applications

Appendix E - Authorities Charging for Individuals and Organisations to be added to and to remain on the Self-build and Custom Housebuilding Register

Appendix F - Proposed Fees for Charging for Individuals and Organisations to be added to and to remain on the Self-build and Custom Housebuilding Register

Appendix G – Authorities Charging for Processing Amendments to Planning Applications

Appendix H – Authorities Charging S106 Monitoring Fees

Appendix I - Fees charged by other authorities for document release and property history searches

Appendix J – Proposed Fees for document release and property history searches

Appendix K – Proposed Fees for processing postal and email planning applications

Appendix L – Proposed Pre-application Service Fees

Appendix M – Current Planning Document Charges in the Council's Fees & Charges 2024/25

Appendix N – Monitoring Fees Secured in Respect of Allocated Site HSG1

Appendix A – Authorities Charging for Compliance with Obligations and/or Conditions Requests and Proposed NBBC Fees and Response Targets

Compliance with obligations requests		
Council	Charge	Response Target
Chelmsford City Council	£250	N/A
Cherwell District Council	£224.40	28 days
East Suffolk Council	£96 per property/group of properties on same site	N/A
Huntingdonshire District Council	£67 per hour of work, plus VAT	N/A
Gloucester City Council	£24	10 working days
Tower Hamlets Council	Fee not specified	20 working days
Merton Council	£180 per hour	N/A
Nuneaton and Bedworth Borough Council (proposed)	£240	56 days (8 weeks)

Compliance with conditions requests		
Council	Charge	Response Target
Cherwell District Council	£86 for householders, £298 for all other apps	56 days
Hinckley and Bosworth Borough Council	£86 for householders, £298 for all other apps	56 days
Bracknell Forest Council	£86 for householders, £298 for all other apps	42-56 days
Stevenage Borough Council	£43 for householders, £145 for all other apps	10 working days
North Somerset Council	£43 for householders, £145 for all other apps	10 working days
Wakefield Council	£77.63 for all apps	21 days
Merton Council	£180 per hour	N/A
Nuneaton and Bedworth Borough Council (proposed)	£65 for a householder extension request, £225 for all other requests	56 days (8 weeks)

Appendix B – Proposed Fees for Compliance with Obligations and/or Conditions Requests

Proposed Fees and Response Targets			
Type	Estimated resourcing costs including overheads 2026/27	Proposed Charge	Response Target
Compliance with obligation requests	£237.66	£240	56 days
Compliance with conditions requests	£65.54 householder extension request £222.85 for all other requests	£65 for a householder extension request, £225 for all other requests	56 days

Appendix C – Authorities Offering a Fast Track Service

Authority	Decision within	Charge
Lichfield District Council Planning fees – Fast track application fee	Prior-approvals and householders: 3 working days from end of consultation LDCs: 5 working days	Prior approvals and LDCs: £85 Householders: £165 Pay within 3 calendar days from submission.
Luton Council Planning fees	LDCs: 10 working days from receiving valid app. Householders and prior-approvals: 5 working days from end of consultation	Householder: £250 LDCs: £300 Prior approval: £200
Kensington & Chelsea Fast Track Application Service | Royal Borough	Householders: 2 working days from end of consultation period. LDCs: 10 working days	Householders and LDCs: £800 each

of Kensington and Chelsea		
Redbridge Redbridge - Fees and fast track	Householders: 5 working days from end of consultation. LDCs: 10 working days	Householders: £239 LDCs: £120
Surrey Heath Fees | Surrey Heath Borough Council	Offer fast track for all services – validation ,site visits, decisions, for various applications including minors.	From £100 depending on service. Maximum for householder £600, LDCs £400
Barnet London Borough Fast Track planning application service | Barnet Council	Offers a fast track service on a range of applications and services.	Fees depend on the type of application and the level of service
Nuneaton and Bedworth Borough Council (proposed)	Householder planning applications (to include any associated listed building consent application)- Decision made within 28 days Lawful Development Certificates and Prior Approval applications for Larger Homes extensions- Decision made by 28 days	£270 £135

Appendix D – Authorities Charging for Processing Invalid Applications

Authority	Charged when	Charge
Lichfield District Council	If application invalid, given the option to withdraw and refund (minus 10% planning fee as admin charge) or pay for invalid	Withdrawal – 10% of planning fee. Invalid advice service: Householder/advertisement - £60 Minors - £180 Small major - £240

Planning fees – Invalid advice fees	advice service to help correct application.	Major - £360 All (inc vat)
Tewkesbury Borough Council Apply and pay for planning permission - Tewkesbury Borough Council	Only charged if a satisfactory response to an invalid letter isn't received within 28 days and the application is returned, or if the application is withdrawn after being notified of it being invalid.	Major applications – £185 Minor applications – £95 Householder and other application types – £50
Luton Council Planning fees	If application is invalid, if a satisfactory response to an invalid letter isn't received within 28 days, or if the application is withdrawn after being notified of it being invalid.	Major applications - £250.00 Non-major commercial/new residential unit(s) applications - £150.00 All other applications - £100.00
Surrey Heath Planning fees | Surrey Heath Borough Council	When the application is first made invalid, and when an application is withdrawn after notification it is invalid.	Majors - £225 Non- majors commercial/ new dwelling (s) - £150 Householder, LDC and any other planning application (excluding priors and NMA) - £75
Barnet London Borough Planning administration fees | Barnet Council	Payment needs to be made to validate the application	Majors - £250 Minors - £150 All others - £75
Dacorum Borough Council Planning application fees	Only charged if a satisfactory response to an invalid letter isn't received within 28 days and the application is returned, or if the application is withdrawn after being notified of it being invalid.	Majors - £200 Minors - £120 All others - £60
Tewkesbury Borough Council	Only charged if a satisfactory response to an invalid letter isn't received	Majors - £150 Minors - £75 Householders and others - £45

Invalid-application-charges-customer-note.pdf	within 28 days and the application is returned, or if the application is withdrawn after being notified of it being invalid.	Note, they count changes to the description as app being invalid e.g., changing from kitchen extension to single storey rear extension would be chargeable.

Proposed Fees for Invalid Advice Service		
Application Type	Estimated resourcing costs including overheads 2026/27	Proposed Fee
Minor applications	£107.93	£110 per attempt
Small major application	£155.90	£160 per attempt
Major application	£215.87	£220 per attempt
All other application types not falling within the above categories	£47.97	£50 per attempt

Appendix E - Authorities Charging for Individuals and Organisations to be added to and to remain on the Self-build and Custom Housebuilding Register

Authority	Charge
Lichfield District Council Self build and custom build homes – Self-build register	£100 to join Register £50 annual subscription fee to remain on the register
The London Borough of Camden Self-build and Custom Housebuilding Register - Camden Council	Part 1 of Register (have lived in Borough for 5 years) - £445.67 Part 2 of Register - £222.83
West Northamptonshire Council Register of self-build and custom-build | West Northamptonshire Council	Part 1 of Register - £81.60, then £81.60 per year Part 2 of Register - £40.80
Guildford Borough Council Fees - Guildford Borough Council	Part 1 of Register - £31 Part 2 of Register - £13
Royal Borough of Greenwich Council Register for a self-build or custom-build plot | Royal Borough of Greenwich	Part 1 of Register - £150, then £25 annually Part 2 of Register - £95
Basingstoke and Deane Borough Council Self-build and Custom Build Register	£15 to join Register

Nuneaton and Bedworth Borough Council (proposed)	£40- to be added to the register £20- reviewing each registration each year

Appendix F - Proposed Fees for Charging for Individuals and Organisations to be added to and to remain on the Self-build and Custom Housebuilding Register

Proposed Fees for Charging for Individuals and Organisations to be added to and to remain on the Self-build and Custom Housebuilding Register	
Estimated resourcing costs including overheads 2026/27	Proposed Fee
Applications to be added to the register £38.03	£40
Work associated with reviewing each registration each year £19.01	£20

Appendix G – Authorities Charging for Processing Amendments to Planning Applications

Authority	Charge
Lichfield District Council Planning fees – Amendment charges	Householders and Minors: No amendments accepted, new application required. Small major (10- 199 dwellings, 1.9 - 3.9 hectares or 1,000 - 9,999 square metres floor area): £200 per amendment, maximum 3 amendments. Major application (200+ dwellings and over four hectares or 10,000 square metres floor area): £350 first request, £450 second request, £600 third request (unless in a PPA), maximum 3 amendments.
Merton Planning fees and charges | Merton Council	Lawful Development Certificates (Householders): Proposed: £129 per amendment, Existing: £420 per amendment. Householders: £420 per amendment, but £210 for ancillary householders. Advertisements, Listed Building Consents, Minors, Lawful Development Certificates (Use), Discharge of Conditions:

	£210 per hour (unclear whether they mean per amendment rather than hour)
Dartford Borough Council Charging to amend a planning application – Dartford Borough Council	Householders: £150 per amendment Minors: £250 per amendment Small major with no PPA (10 - 49 houses/flats, 0.51 - 2 hectares or 1,000 - 4,999 square metres floor area): £700 per amendment. Major application with no PPA (50 + houses/flats, 2 + hectares or 5,000 + square metres floor area): £1000 per amendment. Advertisement Consent: £100 Permission in Principle: £100
Southwark Council Service charges | Southwark Council	Householders: £60 an hour, up to £100 (N/A when providing access for a disabled resident) Advertisement Consent: £60 an hour, up to £100 maximum charge, £2000 max charge for advertisement boards not attached to business premises. Listed Building Consent: £60 an hour, up to £200 maximum charge Minors: £60 an hour, up to £2000 maximum charge Telecommunication: £60 an hour, up to £2000 maximum charge
St Albans City and District Council Planning Application Amendment Service | St Albans City and District Council	Apply to make amendments by contacting case officer. Charge £240 for the service, case officer must accept request before changes made. OR: Case Officer requests amendments, applicant has to option to withdraw, refuse suggested amendments, or accept amendments and pay charge. £240.
Averages:	Householders: £227.50 Advertisement Consent: £162.50 Listed Building Consent: £225 Small Majors: £380 Large Majors: £566

	Minors: £200 Telecommunication: £170

Proposed Charges for Processing Amendments to Submitted Planning Applications		
Application Type	Estimated resourcing costs including overheads 2026/27	Fee charged per amendment
Householder applications		No charge
Minor applications	£103.82	£110
Small Major applications without PPA in place	£136.73	£140
Major applications without PPA in place	£167.72	£170
Advertisement consent applications	£103.82	£110
All other application types not falling within the above categories	£103.82	£110

Appendix H – Authorities Charging S106 Monitoring Fees

Authority	Fees
Central Bedfordshire Planning obligations | Central Bedfordshire Council	Fee based on % of funds secured 5% up to £100,000 £5000 + 4% between £100,001 to £500,000 £21,000 + 3% between £500,001 to £1,000,000 £36,000 + 2% between £1,000,001 - £3,000,000 £76,000 + 1% over £3,000,001 £500 per non-financial obligation Stage payments of the fee due for large scale development will be considered and is to be agreed with the Planning Officer in consultation with the S106 Monitoring team
East Suffolk Council Planning obligations monitoring fees	£460 per obligation trigger towards administration costs

<table>
<tr><td>» East Suffolk Council</td><td></td></tr>
<tr><td>Merton London Borough Section 106 agreements and other planning obligations | Merton Council</td><td>
A + B + C + D = base charge for each financial contribution
<table>
<tr><td>Contribution portion</td><td>Charge portion</td></tr>
<tr><td>(A) First £25k</td><td>£500</td></tr>
<tr><td>(B) £25,000.01 to £100k</td><td>Plus 5% of the value of the portion of the contribution over £25k and up to and including £100k</td></tr>
<tr><td>(C) £100,000.01 to £250k</td><td>Plus 2% of the value of the portion of the contribution over £100k up to and including £250k</td></tr>
<tr><td>(D) £250,000.01 and above</td><td>Plus 1% of the value of the portion of the contribution over £250k</td></tr>
<tr><td>Examples</td><td></td></tr>
<tr><td>1. £30k financial contribution</td><td>(A) £500 + (B) (5% x £5k) = £750</td></tr>
<tr><td>2. £300k financial contribution</td><td>(A) £500 + (B) (5% x £75k) + (C) (2% x £150k) + (D) (1% x £50k) = £7,250.50</td></tr>
</table>
</td></tr>
<tr><td>Tonbridge and Malling Planning obligations – Tonbridge and Malling Borough Council</td><td>£460 per obligation</td></tr>
<tr><td>South Holland Section 106 Monitoring Fees - South Holland District Council</td><td>Minors - £1825
Small majors - £3035
Large majors - £4195</td></tr>
<tr><td>Spelthorne Microsoft Word - Spelthorne S106 Monitoring fees</td><td>Financial - 5% per obligation (capped at a maximum fee of £10,000)
Non-financial - £600 per obligation</td></tr>
<tr><td>Guildford Borough Council</td><td>£840 per payment trigger (financial and non financial)</td></tr>
<tr><td>Surrey Heath Borough Council</td><td>5% of total contribution (financial)
£650 per trigger (non-financial)</td></tr>
<tr><td>London Borough of Hillingdon</td><td>5% of total contribution (financial)</td></tr>
<tr><td>East Hampshire District Council</td><td>5% per head of term (financial)
£951 per trigger (non-financial)</td></tr>
</table>

Rushmoor Borough Council	7.5% of total contribution (financial) up to a maximum of £30,000 for full or hybrid applications and £15,000 for outline applications
Havant Borough Council	5% of cost per financial head of term. Capped at £10,670 (financial) £739 (non-financial head of term)
Nuneaton and Bedworth Borough Council (proposed)	£600 per non-financial head of term (outside the scope of VAT) 5% of cost per Nuneaton and Bedworth Borough Council financial head of term (outside the scope of VAT)

Appendix I - Fees charged by other authorities for document release and property history searches

Authority	Request Type	Fee
Litchfield District Council Planning fees – Document charges	Decision notices (including appeal decisions) & enforcement notices from 1974 (available in 5 working days)	£10
	Decision notices (including appeal decisions) & enforcement notices (available in 1 working day) from 1997	£20
	Planning property history search	£50
	Copies of approved/refused plans (per set)	£50
Luton Borough Council Planning fees	A request for historic or archive documents such as a decision notice, section 106 document or a set of plans)	£100 (with 10 working days) £150 (within 24 hours)
Hinckley and Bosworth Borough Council How to check the history of a property or piece of land | Planning history check | Hinckley & Bosworth Borough Council	Planning property history search	£68.30

Appendix J – Proposed Fees for document release and property history searches

Request Type	Response Target	Estimated resourcing costs including overheads 2026/27	Charge
Decision notices (including appeal decisions) & enforcement notices	Available in 5 working days	£15.83	£20
Planning property history search	Available in 5 working days	£35.98	£40
Copies of approved/refused plans (per set) or legal agreement	Available in 5 working days	£35.98	£40

Appendix K – Proposed Fees for processing postal and email planning applications

Submission Type	Estimated resourcing costs including overheads 2026/27	Proposed Admin Fee
Email application	£35.98	£40
Postal application	£47.97	£50

Appendix L: Proposed Pre-application Service Fees

Pre-application Advice Category	Estimated resourcing costs including overheads 2026/27	Current Fee	Proposed Fee
Householder development			
Extension or development	£198.16	£168	£200
Non residential			
Advertisements	£198.16	£180	£200

Non-residential floorspace - less than 200 sqm	£300.38	£168	£300
Other development			
Permitted Development	£228.42	£120	£230

Appendix M - Current Planning Document Charges in the Council's Fees & Charges 2024/25

	2024/25 Prices	
Planning Documents		
Borough Local Plan - Residents	22.28	+ £2.75 Postage
Borough Local Plan - Non-Residents	36.42	+ £2.75 Postage
Residential Design Guide	4.61	
Postal Numbering Plans	94.37	
Ann.Sub.- Weekly List of Planning Applications (post)	125.01	
Ann.Sub.- Weekly List of Planning Applications (email)	81.30	
Copies of Decision Notices (Electronic)	12.00	
Copies of Decision Notices (Postal)	15.96	
Breach of Conditions Notice	18.85	
Copy of Tree Preservation order	33.64	
A3 Copies of Other Planning Application Documents	1.39	
A4 Copies of Other Planning Application Documents	0.86	
Plans - Up to A1	2.89	
Sewer Map Extracts	28.39	

Appendix N - Monitoring Fees Secured in Respect of HSG1

Planning permission reference 033758	
Financial Obligations	Funds secured
Allotments	£10,809.65
Community Park	£148,717.30
Destination Park	£87,817.28
On-Site Open Space Maintenance Contribution	£15,458.77
Playing Pitch	£8,471.55
Total sum of financial Obligations	£271,274.55
Non-financial Obligations	
Open space	N/A
Affordable Housing	N/A
Management company	N/A
Monitoring Fee Secured	£1,130.00
Monitoring Fees as a result of Proposed Income Stream 6	£13,563.73 (5% of £271,274.55) £1,800 (3 x £600 for each non-financial obligation) Total = £15,363.73

Planning permission reference 035279	
Financial Obligations	Funds secured
Open Space	£867,996.94
Cycle Path contribution	£238,054.46
Sports and Leisure Contribution	£1,904 per dwelling
Total sum of financial Obligations	At least £1,106,051.40
Non-financial Obligations	
Cycle Bridge Scheme	N/A
Leisure Land	N/A
Management Company	N/A
Affordable Housing	N/A
Open Space	N/A
Monitoring Fee Secured	£3,000
Monitoring Fees as a result of Proposed Income Stream 6	At least £55,302.57 (5% of £1,106,051.40) (this excludes the Sports and Leisure Contribution) £3,000 (5 x £600 for each non-financial obligation) Total = £58,302.57

Planning permission reference 034076	
Financial Obligations	Funds secured
Biodiversity Offsetting Contribution	£62,156.98
Parks, Play and Open Space Contribution	£198,022.79
On Site Maintenance Contribution	£86,502.83
Sports, Recreation and Community Contribution	£868,688.74
Total sum of financial Obligations	£1,215,371.34
Non-financial Obligations	
SuDS	N/A
Management Company	N/A
Affordable Housing	N/A
Open Space	N/A
Monitoring Fee Secured	£1,130.00
Monitoring Fees as a result of Proposed Income Stream 6	At least £60,768.57 (5% of £1,215,371.34) £2,400 (4 x £600 for each non-financial obligation) Total = £63,168.57

Planning permission reference 034615	
Financial Obligations	Funds secured
Open Space Maintenance Contribution	£170,710.72
Off Site Sports and Recreation Contribution	£1,629,994.00
Off-Site Open Space Contribution	£286,365.00
Total sum of financial Obligations	£2,087,069.72
Non-financial Obligations	
Management Company	N/A
Affordable Housing	N/A
Open Space	N/A
Landscape Management Plan	N/A
Monitoring Fee Secured	£1,130.00
Monitoring Fees as a result of Proposed Income Stream 6	£104,353.49 (5% of £2,087,069.72.) £2,400 (4 x £600 for each non-financial obligation) Total = £106,753.49.

Planning permission reference 036873	
Financial Obligations	Funds secured
Biodiversity Contribution	£92,443.60
Parks and Open Space Contribution	£130,490.65
Sports Facilities Contribution	£92,242.00
Total sum of financial Obligations	£315,176.25
Non-financial Obligations	
Management Company	N/A
SUDS	N/A
Affordable Housing	N/A
Open Space	N/A
Monitoring Fee Secured	£1,130.00
Monitoring Fees as a result of Proposed Income Stream 6	£15,758.81 (5% of £315,176.25.) £2,400 (4 x £600 for each non-financial obligation) Total = £18,158.81.

Planning permission reference 032336	
Financial Obligations	Funds secured
Open Space Maintenance Contribution	£1,185.45 per 1 bed dwelling and £1,693.63 per 2+ bed dwelling
Community Facility Contribution	£29,675.00
Total sum of financial Obligations	At least £29,675.00
Non-financial Obligations	
Management Company	N/A
Balancing Ponds	N/A
Affordable Housing	N/A
Community Facility Improvements	N/A
Open Space	N/A
Monitoring Fee Secured	£1,000.00
Monitoring Fees as a result of Proposed Income Stream 6	£1,483.75 (5% of £29,675.00.) £3,000 (5 x £600 for each non-financial obligation) Total = At least £4,483.75

Planning permission reference 032438	
Financial Obligations	Funds secured
Open Space Contribution	£1,926.00 per 1 bedroom dwelling and £2,750.00 per 2+ bedroom dwelling = At least £231,120.00
Total sum of financial Obligations	At least £231,120.00
Non-financial Obligations	
Management Entity	N/A
Balancing Ponds	N/A
Affordable Housing	N/A
Open Space	N/A
Monitoring Fee Secured	£1,130.00
Monitoring Fees as a result of Proposed Income Stream 6	£11,556.00 (5% of £231,120.00.) £2,400 (4 x £600 for each non-financial obligation) Total = At least £13,956.00

Planning permission reference 032578	
Financial Obligations	Funds secured
Open Space Contribution	£202,926.93
Total sum of financial Obligations	£202,926.93
Non-financial Obligations	
Management Entity or Management Company	N/A
SUDS	N/A
Affordable Housing	N/A
Open Space	N/A
Monitoring Fee Secured	£1,130.00
Monitoring Fees as a result of Proposed Income Stream 6	£10,146.35 (5% of £202,926.93) £2,400 (4 x £600 for each non-financial obligation) Total = £12,546.35

Planning permission reference 032992	
Financial Obligations	Funds secured
Off-Site Open Space Contribution	£503,750.09
Total sum of financial Obligations	£503,750.09
Non-financial Obligations	
Management Company	N/A
SUDS	N/A
Affordable Housing	N/A
Open Space	N/A
Monitoring Fee Secured	£1,130.00
Monitoring Fees as a result of Proposed Income Stream 6	£25,187.50 (5% of £503,750.09) £2,400 (4 x £600 for each non-financial obligation) Total = £27,587.50.

Planning permission reference 031741	
Financial Obligations	Funds secured
Open Space Contribution	£1,870.00 for each 1 bed dwelling and £2,670.00 in respect of each 2+ dwelling = At least £123,420
Total sum of financial Obligations	At least £123,420
Non-financial Obligations	
Management Company	N/A
SUDS	N/A
Affordable Housing	N/A
Open Space	N/A
Monitoring Fee Secured	£1,500.00
Monitoring Fees as a result of Proposed Income Stream 6	At least £6,171 (5% of £123,420) £2,400 (4 x £600 for each non-financial obligation) Total = At least £8,571

Total Monitoring Fees secured across HSG1	£13,410.00
Total Monitoring Fees as a result of Proposed Income Stream 6	At least £328,891.77

AGENDA ITEM NO.

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	4th November 2026
Subject:	Consultation on the Budget 2027/28
Portfolio:	Finance
Responsible Officer:	Assistant Director - Finance
Corporate Plan – Theme:	All
Corporate Plan – Aim:	All
Ward Relevance:	All
Public or Private:	Public
Amendment to Budget:	No Council Tax Related: No
Recommendation to Council:	No
Forward Plan:	Insert
Subject to Call-in:	No – To ensure the consultation feedback can be factored into the 2027/28 budget setting process.

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1. Purpose of report

1.1. To seek delegated authority from Cabinet to produce and run a public consultation as part of the Council's budget setting process for 2027/28.

2. Recommendations

2.1. Delegated authority be granted to the Strategic Director for Corporate Resources in consultation with the Portfolio

Holder for Finance to produce and run a public consultation ahead of the Council's budget setting for 2027/28.

2.2. It be noted the outcome of the consultation will be issued back no later than 24th February 2027 to ensure proposals for the 2027/28 budget have considered feedback provided in the consultation.

2.3. The report be marked not for call in, due to the timescales for consultation and, ensuring feedback can be factored into the 2027/28 budget setting process, as provided for in paragraph 15(f) of the Overview and Scrutiny Procedure Rules in Part 4 of the Constitution

3. Background

3.1. Local authorities in England have a statutory duty to consult on certain aspects of their budget-setting process under the Local Government Finance Act 1992.

3.2. The act specifically references the requirement to consult with representatives of business rate payers, and a requirement to publish notices of Council Tax.

3.3. However, the best practice suggests that the Council should extend this consultation on a wider public basis, seeking to gather feedback on budget proposals from those whom the budget is intended to serve.

4. Body of report and reason for recommendations

4.1. The Council is required under Section 65 of the Local Government Finance Act 1992 to consult with representatives of non-domestic ratepayers prior to setting its budget. While this statutory requirement is limited in scope, it is widely recognised that broader public consultation represents good governance and supports transparency and accountability in decision-making.

4.2. Engaging the wider public in budget setting process allows the Council to better understand community priorities, identify potential impacts of proposed changes, and ensure that resources are allocated in a way that reflects the needs and expectations of residents and stakeholders.

4.3. The proposed public consultation will provide an opportunity for individuals, community groups, businesses, and other stakeholders to comment on the Council's budget proposals for 2027/28. This feedback will be considered alongside other evidence and statutory requirements in finalising the budget.

4.4. Delegating authority to the Strategic Director for Corporate Resources, in consultation with the Portfolio Holder, will enable the timely development and delivery of the consultation process, ensuring that it aligns with the Council's budget timetable and statutory deadlines.

4.5. It is proposed to hold the consultation for a minimum of eight (8) weeks in line with the Constitution, given the development of the Budget forms part of the Budget and Policy Framework. The proposed timetable is as follows assuming no call-in:

4.5.1. Cabinet Meeting: 4th November 2026
4.5.2. Decision come into force: 5th November 2026
4.5.3. Consultation launched: 5th November 2026
4.5.4. Consultation ends no later than: 4th January 2027

4.6. The consultation will take place via a survey on the Council website, with other options available for the public for accessibility purposes where it is not possible for completion via the website.

4.7. The content of the survey and consultation will cover key themes and topics such as asking for views on delivery of key services, opportunities for growth, opportunities for savings and/or delivery of key services of importance to residents.

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

5.1. Consultation with the Council's Corporate Executive Tem, and Cabinet.

6. Financial Implications

6.1. The consultation will help shape the forthcoming budget. Associated costs will be met from existing resources within Finance.

7. Legal Implications

7.1. Consultation will satisfy the legal requirement under Section 65 of the Local Government Finance Act 1992. Broader public engagement also aligns with the principles of transparency and accountability under the Local Government Act 1999.

8. Equalities implications

8.1. No specific equality implications have been identified following the completion of an equality impact assessment, however, an consultation will be designed to ensure wide accessibility.

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	Do nothing	The Council could choose to only comply with the letter of the legislative requirement and not consult on a wider public basis. However, it is widely recognised that public consultation is best practice.
B	Delay	Delaying consultation could risk misalignment with budget-setting timelines and reduce the opportunity for meaningful feedback. Furthermore, as the development of the Budget forms part of the Budget and Policy Framework under the Council Constitution, consultation shall be no less than eight (8) weeks. It is also noted that the budget will need to be finalised and included as a key report for 24th February 2027 Cabinet and Council meeting

17. Conclusion

17.1. In line with statutory requirements and best practice, the Council recognises the importance of engaging with stakeholders in the budget-setting process. While the legal duty to consult is limited to representatives of non-domestic ratepayers, a broader public consultation will enhance transparency, accountability, and community involvement. This will be undertaken no less than eight (8) weeks in line with the Constitution.

17.2. Delegating authority to the Strategic Director for Corporate Resources, in consultation with the Portfolio Holder, will ensure that the consultation is designed and delivered effectively, in a way that is timely, inclusive, and

aligned with the Council's strategic priorities and financial planning cycle.

17.3. The feedback received through the consultation will be used to inform the final budget proposals for 2027/28, helping to ensure that the Council's resources are targets in a way that reflects the needs and aspirations of the communities it serves.

18. Appendices

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

19. Background papers

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

20. Report Writer Details:

Officer Job Title: Assistant Director - Finance

Officer Name: Liam Brown

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 13

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Cabinet
Date of Meeting:	4 November 2026
Subject:	Publication of the register of licences for Houses in Multiple Occupation.
Portfolio:	Planning, Enforcement and Public Services
Responsible Officer:	Strategic Director Culture and Environment
Corporate Plan – Theme:	Housing, Health and Communities Your Council
Corporate Plan – Aim:	Facilitate warm, safe, sustainable and affordable housing; Strive for transparency and accountability, in all that we do. Increase public scrutiny.
Ward Relevance:	All
Public or Private:	Public
Amendment to Budget:	No Council Tax Related: No
Recommendation to Council:	No
Forward Plan:	Yes
Subject to Call-in:	Yes

1. Purpose of report

1.1. This report has been prepared following the Leader's stated intention to publish the Council's register of licences for Houses in Multiple Occupation online.

1.2. To advise Cabinet of the Council's current statutory arrangements regarding the House in Multiple Occupation (HMO) Register.

1.3. To confirm that the Council is compliant with its legal obligations by maintaining an HMO Register and making it available for inspection in accordance with legislative requirements.

1.4. To present Cabinet with options regarding the publication of HMO Register information on the Council's website, including the officer recommendation to retain existing arrangements.

1.5. To advise Cabinet that consultation has been undertaken with relevant partners, including the Police, Fire and Rescue Service and Warwickshire County Council colleagues and that a risk assessment has been completed and is attached as an appendix to this report.

1.6. It sets out the legal framework, appraises the available options, makes a recommendation and identifies the decision route.

1.7. The scope is limited to the manner and extent of public access to the register maintained under section 232 of the Housing Act 2004.

2. Recommendations

2.1. Cabinet is recommended to:

2.1.1. Consider the report and options contained in the report;
2.1.2. Consider the associated risks and appendices attached to the report; and
2.1.3. Approve either option A, B, C or D.

3. Background

3.1. Local housing authorities are required to maintain a register of licensed Houses in Multiple Occupation (HMOs)

in accordance with the Housing Act 2004. The legislation states:

(1)Every local housing authority must establish and maintain a register of—

(a)all licences granted by them under Part 2 or 3 which are in force;
(b)all temporary exemption notices served by them under section 62 or section 86 which are in force; and
(c)all management orders made by them under Chapter 1 or 2 of Part 4 which are in force.

(2)The register may, subject to any requirements that may be prescribed, be in such form as the authority consider appropriate.

(3)Each entry in the register is to contain such particulars as may be prescribed.

(4)The authority must ensure that the contents of the register are available at the authority's head office for inspection by members of the public at all reasonable times.

(5)If requested by a person to do so and subject to payment of such reasonable fee (if any) as the authority may determine, a local housing authority must supply the person with a copy (certified to be true) of the register or of an extract from it.

(6)A copy so certified is prima facie evidence of the matters mentioned in it.

(7)In this section "prescribed" means prescribed by regulations made by the appropriate national authority.

3.2. The Register is available for inspection by members of the public upon request and appropriate arrangements are in place to facilitate access. Consequently, the Council is compliant with current legislative requirements and there is no statutory requirement for the register to be published online or made available in a downloadable format.

3.3. While the register must be available on request, many local authorities publish a register to proactively support

transparency, improve compliance, and assist residents in identifying licensed properties.

3.4. The proposal has been the subject of significant discussion at Cabinet and in the media, and concerns relating to public safety have been raised. This has resulted in the Council receiving concerns regarding the publication of the register, and to the extent that the Council's insurance provider has been notified of such risk by others.

3.5. Advice has been sought from Warwickshire Police, Warwickshire Fire and Rescue and Warwickshire County Council teams.

4. Body of report and reason for recommendations

4.1. There is no statutory requirement to publish the register online. Online publication is a discretionary act and hence the report coming before Cabinet. Continued withholding from the website is lawful, provided the inspection and copy on request duties are discharged.

4.2. Regulation 11 of the Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 prescribes the particulars for each entry. These include the name and address of the licence holder, the name and address of the person managing the property, the address of the licensed property, a short description of it, a summary of the licence conditions, the permitted number of households and persons, the commencement and expiry dates, and summary information on any tribunal proceedings.

4.3. For individual landlords, the prescribed address is frequently a home address. It is personal data and its publication requires separate justification.

Data Protection

4.4. Proactive publication to the world at large is a materially different processing operation from inspection at the Town Hall or supply of a copy on request. It requires its own lawful basis. Article 6(1)(c) of the United Kingdom General Data Protection Regulation supports disclosure to the extent required by section 232, but publication going

beyond that duty must rest on Article 6(1)(e) and be shown to be necessary and proportionate to the Council's public task.

4.5. The data minimisation principle at Article 5(1)(c) requires the published fields to be limited to what is necessary. A Data Protection Impact Assessment is required under Article 35 before publication proceeds, given the scale of the processing and the risk to the rights and freedoms of both occupants and licence holders. A data protection impact assessment has been completed based on option A, B and C the noting these three options cover no publication, partial publication and full publication, a copy of the assessment is attached at appendix C. Option A as recommended as this results in the lowest risk rating overall.

4.6. Section 21 of the Freedom of Information Act 2000, covering information reasonably accessible to the applicant by other means, is available while the register remains accessible under section 232. Sections 38 and 40 may apply to entries or fields. Each request falls to be considered on its own facts, and a blanket position should not be adopted.

Limitation on the effect of withholding

4.7. The duty at section 232(5) to supply a copy of the register on request contains no public safety exemption in the English provision. This may be contrasted with the position in Northern Ireland, where councils are under an express duty to exclude from the register information likely to jeopardise safety or welfare, and where Belfast City Council removed its register from its website after properties of this type were targeted. The English provision offers no equivalent route.

4.8. The practical consequence is that withholding the register from the website changes the ease and the scale of access, not whether the information can be obtained. This limitation must be stated plainly in the decision report so that the decision maker is not invited to treat non-publication as a complete answer to the safety concern.

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

Warwickshire Police Response

5.1. Warwickshire Police acknowledges receipt and review of the HMO Publication Risk Assessment provided by Nuneaton and Bedworth Borough Council. Having considered the assessment, they consider it to be a comprehensive, balanced and proportionate evaluation of the potential risks and benefits associated with publication.

5.2. From a policing perspective, Warwickshire Police has not identified any additional risks beyond those already captured within the assessment and associated discussions. They would, however, note that the level of any potential risk remains significantly dependent upon the accuracy of the information published, together with the context and explanatory narrative provided alongside it. Clear communication regarding the purpose of the register and the broad definition of HMOs will be important in reducing misunderstanding and unintended community impacts.

Warwickshire County Council

5.3 County Council colleagues acknowledges the receipt and review of the HMO Publication Risk Assessment provided by Nuneaton and Bedworth Borough Council. Having considered the assessment, they considered it to be comprehensive consideration and proportionate of the potential risks and benefits associated with publication. With specific emphasis on protecting potential impact on vulnerable occupants placed in such accommodation.

Crime and disorder

5.4 Section 17 of the Crime and Disorder Act 1998 requires the council to exercise its function with due regard to the likely effect of the exercise of those functions on and the need to do all that it reasonably can to prevent crime and disorder in its area. Crime and disorder for this purpose includes anti-social behaviour adversely affecting the local environment and the duty extends in the same terms of violence. It applies to every function the council exercises, including a discretionary decision about how a statutory register is made available and how a statutory register is made available and it applies in addition to the duties described above.

Access to information

5.5 Section 21 of the Freedom of Information Act 2000, covering information reasonably accessible to the applicant by other means, is available while the register remains accessible under section 232. Sections 38 and 40 may apply to particular entries or fields. Each request falls to be considered on its own facts, and a blanket position should not be adopted.

Equality

5.6 Section 149 of the Equality Act 2010 is the Public Sector Equality Duty. It requires the Council, when exercising its functions, to have due regard to the need to:

a) eliminate discrimination, harassment, victimisation and other prohibited conduct;
b) advance equality of opportunity between people who share a protected characteristic and those who do not; and
c) foster good relations between those groups.

For the HMO-register decision, this means the decision-maker should consciously consider the potential equality effects before deciding whether and how to publish, supported by an equality impact assessment. The relevant characteristics may include race, age, disability and sex. Appendix B of the report is the equality impact assessment considering this decision.

Warwickshire benchmarking

5.7 A benchmarking exercise across Warwickshire has been undertaken. The table below outlines the comparison between other borough/district council's in Warwickshire in regard to the online publication of the HMO register.

Information field	Warwick District Council Register accessed online	North Warwickshire Borough Council Register accessed online	Rugby Borough Council Register not available online	Stratford Upon Avon District Council Register accessed online
Property address	Yes	Yes	N/A	Yes
Licence holder name and address	Name – Yes Address - No	No	N/A	Yes
Licence Issue date	Yes	Yes	N/A	Yes
Licence expiry date	Yes	Yes		Yes
Maximum permitted occupants	Yes	Yes	N/A	Yes
Licence reference number	Yes	Yes	N/A	Yes
Geo coded location	No	No	N/A	No
Manager details	Yes	No	N/A	Yes
Properties housing vulnerable tenants	Not included	Not included	N/A	Not included

6 Financial Implications

6.4 There are no direct financial implications resulting from the content of this report. However, please note 7.4 and 12.2 of the report and thus a need to resource any legal challenge if the Council received claims arising from any publication.

6.5 Publication of a redacted register (option B) if Cabinet were minded to publish, would result in minor officer resource requirements relating to preparation, publication, review, ongoing maintenance and information governance oversight. Remaining with status quo (Option A), results in the least amount of officer resource.

7 Legal Implications

7.4 As outlined earlier in the report, the Council is required to maintain an HMO Register and make it available for inspection in accordance with applicable housing legislation.

7.5 The Council is currently compliant with those statutory requirements.

7.6 Any publication of information beyond the statutory minimum should have regard to data protection legislation, common law confidentiality obligations and wider public law considerations.

7.7 Cabinet should note that if C or D is decided, the Council legal team would be unable to defend a claim against the Council and so, an external legal appointment would be required.

8 Equalities implications

8.4 Further to 5.5 of the report, Cabinet should consciously consider the potential equality impact (and its legal obligations under the Public Sector Equality Duty) before deciding whether and how to publish the register. The relevant characteristics which this decision may impact include race, age, disability and sex. Appendix B is the equality impact assessment considering this decision.

9 Health implications

9.1 No specific or direct health implications have been identified following the completion of an impact assessment. However, Cabinet are advised to consider the attached risk assessment and equality impact assessment when considering its decision in terms of any indirect health implications dependent on its decision.

10 Environmental implications

10.1 No specific environmental implications have been identified.

11 Section 17 Crime and Disorder Implications

11.1 Please see 5.1 to 5.3 of the report. Furthermore, Cabinet are advised to consider the attached risk assessment and equality impact assessment when considering its decision.

12 Risk management implications

12.1 Risks are outlined in the report and attached risk assessment at Appendix A, B, C and D. No direct risk management implications have been identified for option A.

12.2 Options C and D carry the highest risk for the Council, from a claim, GDPR and defence position. This in term can result in a direct cost implication for any future insurance renewal for the Council.

12.3 Cabinet are advised to consider the attached risk assessment and equality impact assessment when considering its decision.

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	Description	Advantages	Disadvantages
A	Maintain the current position. No online publication. Statutory access provided by inspection at the Town Hall and by certified copy on request.	Lawful and fully compliant with section 232. Lowest exposure in relation to occupant safety. No new processing of personal data requiring justification. Preserves the ability to consider each request on its facts.	Attracts criticism for lack of transparency and is out of step with many authorities. Does not prevent access, as the copy on request duty remains. Increases the volume of individual requests and the associated officer resource.
B	Publish a reduced dataset. Withhold licence holder and manager names and addresses and HMO property address but retain postcode excluding the last two digits of the postcode for example “CV11 3”.	Delivers most of the transparency benefit. Removes the home address exposure for individual landlords and managers. Proportionate under data minimisation principles and straightforward to defend.	Does not reduce the risk to occupants, because the property address is itself the sensitive element. Requires a Data Protection Impact Assessment and a documented necessity and proportionality case. Creates a downloadable, searchable list of licensed properties.
C	Publish the full prescribed register online, including all particulars set out in regulation 11.	Maximum transparency. Removes the need to triage individual requests.	Highest exposure on both occupant safety and landlord safety. Publishes home addresses of individual licence holders and managers to the world at large. Weakest position to defend if harm follows, particularly where advice against publication has been received and not followed.

Option	Description	Advantages	Disadvantages
D	Publish a reduced dataset online including all particulars set out in Regulation 11, with the exception of properties used to accommodate individuals fleeing domestic abuse where publication could undermine the purpose of the accommodation	Next maximum transparency. Aligns largely with the practice of a number of other authorities. Requests will require triaging.	Next highest exposure on both occupant safety and landlord safety. Publishes home addresses of individual licence holders and managers to the world at large. Next weakest position to defend if harm follows, particularly where advice against publication has been received and not followed. Furthermore, as this requires a sift process, it is subject to human error and a property being published invertedly.

The distinction that matters most is that Option B mitigates the risk to licence holders and the data protection risk but does not mitigate the risk to occupants. The property address is itself the sensitive element, and Option B aligns with this risk. Only Option A materially reduces that risk whilst options C and D publish the address information and thus, creates the highest risk against the Council.

17 Conclusion

17.1 The Council already complies with all relevant legislative requirements by maintaining an HMO Register and making it available for public inspection (existing Option A).

17.2 There is no legal requirement to publish the register online.

17.3 Officers have reviewed the matter, undertaken consultation with relevant partners and completed a risk assessment considering the available options.

17.4 Having considered the legal position, consultation responses and risk assessment findings, officers advise to

Cabinet is to retain the current arrangements (Option A) but notes a desire from Cabinet to publish a register.

18 Appendices

18.1 Please note the following appendices:

i. Appendix A – HMO register publication Risk Assessment
ii. Appendix B – Equality impact assessment considering this decision
iii. Appendix C – Data Protection Impact Assessment

19 Background papers

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

Nuneaton and Bedworth Borough Council

Risk Assessment: Online Publication of the Register of Licences for Houses in Multiple Occupation

1. Purpose and scope

1.1 This assessment has been prepared following the Leader's stated intention to publish the Council's register of licences for Houses in Multiple Occupation online. It assesses the risks arising both from publication and from continued withholding, sets out the legal framework, appraises the available options, makes a recommendation and identifies the decision route.

1.2 The scope is limited to the manner and extent of public access to the register maintained under section 232 of the Housing Act 2004.

1.3 This assessment is a draft for comment. It takes account of the response received from Warwickshire County Council, summarised at paragraphs 2.7 and 2.8. At the Chief Executive's request, it also addresses the Council's duty under section 17 of the Crime and Disorder Act 1998, at paragraphs 3.12 to 3.14. Advice from Warwickshire Police has not yet been incorporated, and the conclusions below are provisional to that extent.

2. Background

2.1 The Council is required to maintain a register of licences. The register was previously published on the Council's website and is not currently published.

2.2 The Leader has indicated an intention to publish the register online again.

2.3 The proposal has been the subject of significant discussion at Cabinet and in the media, and concerns relating to public safety have been raised.

2.4 The Council's insurers have been contacted regarding the proposal.

2.5 Advice is being sought from Warwickshire Police and other partner agencies, in light of instances of disorder directed at properties of this type elsewhere in the country.

2.6 A material local factor is the dispersed asylum accommodation procured in the district. However, Serco properties are not on the register, and the Council is not provided with this information by the Government. The register will therefore contain the addresses of properties that are being used by private tenants in the ordinary way, none of which are known to the Council to be in use as asylum accommodation. Two consequences follow. Publication would not deliver transparency about dispersed accommodation, because the properties that are the subject of local concern do not appear. It would, however, place a searchable list of licensed properties into the public domain that may be assumed, wrongly, to be accommodation of that type.

2.7 This assessment was shared in draft with Warwickshire County Council and Warwickshire Police on 17 September 2026. The Executive Director for Children and Young People at Warwickshire County Council responded on 18 September 2026. He supported the weight given to the potential impact on vulnerable occupants,

particularly people placed through homelessness, social care or care leaver arrangements, and to the consequences for children and young people if a property becomes the focus of attention or disorder. He described the recommendation that publication should not proceed until the Police advice, the Data Protection Impact Assessment, Legal advice and the other assessments at section 6 have been completed and considered as a sensible and proportionate approach.

2.8 He asked that the following be established: when and how the decision to remove the register from the website was taken and recorded, and whether a risk assessment was completed at the time; whether the removal followed any specific incident, intelligence, disorder, complaint or concern about targeted properties; whether Warwickshire Police holds any local intelligence on the targeting of licensed properties; how many requests to inspect the register or to obtain a copy have been received since its removal; and whether any assessment has been made of whether vulnerable households, care leavers, people fleeing domestic abuse or others subject to safeguarding concerns are resident in licensed properties that could be identified through publication, including whether any property used as a refuge should be excluded. These points are carried at paragraphs 2.1, 5.4 and 5.15, at C7 and at actions 1 and 8 to 10.

3. Legal framework

Statutory duty

3.1 Section 232(1) of the Housing Act 2004 requires the Council to establish and maintain a register of licences granted under Part 2 and Part 3 of the Act, of temporary exemption notices and of management orders.

3.2 Section 232(4) requires the Council to ensure that the contents of the register are available at its head office, which for this Council is the Town Hall, for inspection by members of the public at all reasonable times. Section 232(5) requires the Council, on request and subject to payment of such reasonable fee as it may determine, to supply a certified copy of the register or of an extract from it.

3.3 There is no statutory requirement to publish the register online. Online publication is a discretionary act. Continued withholding from the website is lawful, provided the inspection and copy on request duties are discharged.

3.4 Regulation 11 of the Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 prescribes the particulars for each entry. These include the name and address of the licence holder, the name and address of the person managing the property, the address of the licensed property, a short description of it, a summary of the licence conditions, the permitted number of households and persons, the commencement and expiry dates, and summary information on any tribunal proceedings.

3.5 For individual landlords, the prescribed address is frequently a home address. It is personal data and its publication requires separate justification.

Data protection

3.6 Proactive publication to the world at large is a materially different processing operation from inspection at the Town Hall or supply of a copy on request. It requires its own lawful basis. Article 6(1)(c) of the United Kingdom General Data Protection

Regulation supports disclosure to the extent required by section 232, but publication going beyond that duty must rest on Article 6(1)(e) and be shown to be necessary and proportionate to the Council's public task.

3.7 The data minimisation principle at Article 5(1)(c) requires the published fields to be limited to what is necessary. A Data Protection Impact Assessment is required under Article 35 before publication proceeds, given the scale of the processing and the risk to the rights and freedoms of both occupants and licence holders.

Human rights

3.8 Section 6 of the Human Rights Act 1998 requires the Council to act compatibly with Convention rights. Where the Council knows, or ought to know, of a real and immediate risk to the life or physical safety of identifiable individuals, positive obligations under Articles 2 and 8 are engaged. The advice sought from Warwickshire Police is therefore evidence that the decision maker must have before them, rather than a matter of courtesy, and it should be recorded in the decision report whether or not it supports publication.

Limitation on the effect of withholding

3.9 The duty at section 232(5) to supply a copy of the register on request contains no public safety exemption in the English provision. This may be contrasted with the position in Northern Ireland, where councils are under an express duty to exclude from the register information likely to jeopardise safety or welfare, and where Belfast City Council removed its register from its website after properties of this type were targeted. The English provision offers no equivalent route.

3.10 The practical consequence is that withholding the register from the website changes the ease and the scale of access, not whether the information can be obtained. This limitation must be stated plainly in the decision report so that the decision maker is not invited to treat non-publication as a complete answer to the safety concern.

Access to information

3.11 Section 21 of the Freedom of Information Act 2000, covering information reasonably accessible to the applicant by other means, is available while the register remains accessible under section 232. Sections 38 and 40 may apply to particular entries or fields. Each request falls to be considered on its own facts, and a blanket position should not be adopted.

Crime and disorder

3.12 Section 17 of the Crime and Disorder Act 1998 requires the Council to exercise its functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. Crime and disorder for this purpose includes anti-social and other behaviour adversely affecting the local environment, and the duty extends in the same terms to serious violence. It applies to every function the Council exercises, including a discretionary decision about how a statutory register is made available, and it applies in addition to the duties described above.

3.13 The duty holds on this decision in two ways. The first is that the decision maker must consider the likely effect of each option on crime and disorder in the borough. The pathway described at paragraph 5.6 is a pathway to crime and disorder: criminal

damage, arson, assault, harassment and intimidation, and gatherings at or near the homes of people who have no part in the decision. The second is that the duty is not confined to considering that effect. It requires the Council to do all that it reasonably can to prevent crime and disorder, so that if publication proceeds, the controls identified in this assessment become part of the discharge of a statutory duty rather than matters of good practice. These include the exclusion mechanism at T2, the removal protocol at T1, the joint response with Warwickshire Police at T3 and the avoidance of publication at a point of heightened tension.

3.14 The duty does not point in one direction only. The licensing regime exists in part to address offences, including the operation of an unlicensed house in multiple occupation and the harassment and unlawful eviction of occupiers, and publication could make it easier for tenants and others to check whether a property is licensed. That benefit is partial, because the register is not a determination of whether a property requires a licence, as noted at C8, so absence from it does not show that a property is being let unlawfully. It would also be offset to the extent that occupants disengage from the Council as described at T5. The Police advice at paragraph 6.1.1 is the principal evidence available on the likely effect of publication on crime and disorder in the borough. A decision taken without demonstrable regard to the duty would be open to challenge, and the decision report should address it expressly under its own heading rather than leave it to be inferred from this assessment.

Equality

3.15 Section 149 of the Equality Act 2010 requires the Council, in exercising its functions, to have due regard to the need to eliminate discrimination, harassment and victimisation, to advance equality of opportunity, and to foster good relations between people who share a protected characteristic and those who do not. The duty is engaged because the risk at T1 arises from an assumption that occupants are migrants or asylum seekers, which relates to race, including nationality and national origins, and because the occupants described at paragraph 5.4 and at T4 include children, care leavers, adults placed under social care duties and people who have left an abusive partner, so that age, disability and sex are also likely to be engaged. An equality impact assessment should be completed alongside the Data Protection Impact Assessment and placed before the decision maker.

4. Options

4.1 Three options have been considered.

Option	Description	Advantages	Disadvantages
A	Maintain the current position. No online publication. Statutory access provided by inspection at the Town Hall and by certified copy on request.	Lawful and fully compliant with section 232. Lowest exposure in relation to occupant safety. No new processing of personal data requiring justification. Preserves the ability to consider each request on its facts.	Attracts criticism for lack of transparency and is out of step with many authorities. Does not prevent access, as the copy on request duty remains. Increases the volume of individual requests and the associated officer resource.

Option	Description	Advantages	Disadvantages
B	Publish a reduced dataset. Withhold licence holder and manager names and addresses and HMO property address but retain postcode excluding the last two digits of the postcode for example “CV11 3”.	Delivers most of the transparency benefit. Removes the home address exposure for individual landlords and managers. Proportionate under data minimisation principles and straightforward to defend.	Does not reduce the risk to occupants, because the property address is itself the sensitive element. Requires a Data Protection Impact Assessment and a documented necessity and proportionality case. Creates a downloadable, searchable list of licensed properties.
C	Publish the full prescribed register online, including all particulars set out in regulation 11.	Maximum transparency. Removes the need to triage individual requests.	Highest exposure on both occupant safety and landlord safety. Publishes home addresses of individual licence holders and managers to the world at large. Weakest position to defend if harm follows, particularly where advice against publication has been received and not followed.
D	Publish a reduced dataset online including all particulars set out in Regulation 11, with the exception of properties used to accommodate individuals fleeing domestic abuse where publication could undermine the purpose of the accommodation	Next maximum transparency. Aligns largely with the practice of a number of other authorities. Requests will require triaging.	Next highest exposure on both occupant safety and landlord safety. Publishes home addresses of individual licence holders and managers to the world at large. Next weakest position to defend if harm follows, particularly where advice against publication has been received and not followed. Furthermore, as this requires a sift process, it is subject to human error and a property being published invertedly.

4.2 The distinction that matters most is that Option B mitigates the risk to licence holders and the data protection risk but does not mitigate the risk to occupants. The property address is itself the sensitive element, and Option B publishes it. Only Option A materially reduces that risk, and only in part for the reasons given at paragraph 3.10.

5. Risk assessment

5.1 Risks are scored on a five-by-five basis. Likelihood and impact are each rated from 1, being the lowest, to 5, being the highest, and the score is the product of the two. Impact is held constant for each risk, and it is the likelihood that changes between the two positions assessed, so that the effect of the decision can be seen directly. Each risk is scored as it stands now, with the register not published online; as it would

stand if the register were published in full under Option C; and as a residual score on the basis of the recommendation at section 8.

Score	Rating	Response required
1 to 4	Low	Accept and monitor through normal service management.
5 to 9	Moderate	Manage through identified controls. Review at agreed intervals.
10 to 15	High	Active mitigation required. Escalate to the Strategic Director.
16 to 25	Very high	Not to be accepted without an explicit, recorded decision by the decision maker.

Who is affected, and how the risk arises

5.2 Three groups are affected by a decision to publish. The first is the tenants and other occupiers of licensed properties. The second is the owners, licence holders and managers of those properties. The third is the Council itself. The three tables at the end of this section deal with each in turn.

5.3 The occupiers are private tenants. They take no part in the licensing decision, are not consulted on publication and in most cases cannot readily move. A licensed property is by definition occupied by several unrelated people, and it is that characteristic which has led properties of this type to be assumed to accommodate migrants or asylum seekers whether or not they do. As set out at paragraph 2.6, none of the dispersed accommodation in the borough appears on the register, so every address published would be one occupied by tenants with no connection to it.

5.4 Licensed properties also accommodate people whose address is sensitive for reasons unconnected with immigration. These include people who have left an abusive partner, people placed by this Council or by another authority under homelessness or social care duties, care leavers and people rehoused following harassment or intimidation. Any licensed property in use as refuge accommodation should be excluded from any published dataset as a matter of course and identified in the first exclusion pass at action 10. The wider concern is that ordinary licensed shared houses are used to accommodate individuals for whom the disclosure of an address is not an inconvenience but a direct route by which they can be found.

5.5 The owners and licence holders are a mixed group, from individuals letting a single property from their own home address to corporate landlords with portfolios. The prescribed particulars include their names and addresses, so the risk to them arises from two distinct things: the exposure of their own home address, and the exposure of the properties they hold.

5.6 The pathway from release of the information to harm is as follows. Publication creates an authoritative and complete list of addresses. That list can be filtered, mapped, downloaded and circulated, and it remains in circulation once copied, whether or not the Council later withdraws it. Individuals or groups seeking to identify properties of a particular type use it as a starting point. Properties are then subject to surveillance, doorstepping, filming, graffiti and criminal damage, and in the most serious cases to

arson or assault. Occupants who were never the intended target are harmed alongside those who were, because the list does not distinguish between them.

5.7 The protection that currently exists is not a legal protection. It is the practical difficulty of attending the Town Hall or making a traceable request, and the fact that no compiled and searchable list is in circulation. Section 232(5) contains no public safety exemption, so a determined requester can still obtain the register. What the decision changes is the ease and the scale of access, and whether the Council itself places the list in the public domain. The tables below are therefore structured to show the position now, the position that would follow publication, and the impact if the risk materialises.

5.8 It is necessary to be clear about what publication would and would not introduce, because the register was previously published on the Council's website. The addresses of licensed properties were in the public domain for that period. Material published online is copied, cached, scraped and saved, so removal from the website did not recover what had already been taken. Part of the exposure assessed in the tables below is therefore not new. What would be new is a current, complete and accurate dataset, kept up to date by the Council, and the attention that a decision to publish would attract.

5.9 Two consequences follow. The first is operational and does not wait on the decision. Any property that ought to be excluded for a protective reason may already have been published, so the exclusion exercise described at T2 should be carried out now rather than held as a condition of publication. Because section 232 contains no public safety exemption (paragraph 3.9), Legal advice should be taken on whether any entry identified can lawfully be withheld from inspection or from a copy supplied on request, having regard to the obligations described at paragraph 3.8. The second is that the earlier publication was passive: it was not announced, not promoted and attracted little attention, and its withdrawal was not announced either. A decision now would be reported as the introduction of something new, which is assessed at T7.

Evidence from elsewhere

5.10 Belfast City Council removed its register from its website in 2025 after properties of this type were targeted. Reporting has since established that the council had been warned about threats to such properties around a year earlier, and that requests to suspend registers had been received in a number of council areas. Attacks in east Belfast earlier that year involved windows being broken and graffiti daubed on the properties concerned. The Northern Ireland legislation expressly requires councils to exclude from the register information likely to jeopardise safety or welfare, and confines access to persons with a particular interest in the property. The English provision contains no equivalent, which makes the decision here a matter of discretion rather than of statutory direction.

5.11 In August 2024 a hotel in Rotherham accommodating more than two hundred people was attacked and set alight. Staff barricaded themselves in a panic room and the occupants were trapped inside. One man was later sentenced to nine years for arson with intent to endanger life. In February 2023 a similar disturbance took place outside a hotel in Knowsley following rumours circulated on social media. Those incidents concerned hotels rather than licensed properties, but they establish the level of harm that can follow once a location becomes publicly associated with a particular group,

and a hotel has a degree of physical security and staffing that a terraced house does not.

5.12 In Williams v Information Commissioner, decided by the First-tier Tribunal in January 2026, the Home Office was held entitled to neither confirm nor deny whether it held information that would reveal whether a site was used as asylum accommodation. The tribunal accepted evidence of repeated harassment, assault and threats at accommodation sites between 2023 and 2025. It found that official confirmation was qualitatively different from press speculation, carrying an authority that would be likely to embolden those inclined to target such sites, and that the public interest in transparency was outweighed. That reasoning applies directly here. An entry on a published council register is official confirmation of the character of a property.

5.13 In the context of council owned property, the Information Commissioner and the Information Tribunal have accepted that addresses used to accommodate individuals requiring protection may be withheld, and that unfairness arises where disclosure identifies individuals as members of a vulnerable group, the examples given including asylum seekers and people who have left a violent partner.

5.14 Practice among authorities that do publish is not uniform, and it is not unconditional. The City of York publishes its register but states that where a property houses vulnerable tenants, such as persons seeking refuge from domestic abuse, the details are redacted, and that a small number of properties are excluded for public safety reasons. Oxford publishes a searchable register linked to a map. Birmingham and Reading publish in full. Publication and targeted exclusion are not alternatives. Authorities that publish routinely operate an exclusion mechanism alongside it, and this Council has none.

Assessment: tenants and other occupiers

Ref	Risk	Position now, register not published online	Position if published online	Impact if the risk materialises	Score	Mitigation
T1	The property is targeted because it is assumed to accommodate asylum seekers or migrants.	The address is obtainable only by attending the Town Hall or making a request for a copy. That requires a deliberate and traceable approach to the Council and produces no searchable list. No current and complete list is in circulation, although material taken during the earlier period of online publication may have been copied and retained.	A complete and authoritative list of every licensed address in the borough is available to anyone at any time without contact with the Council. It can be filtered, mapped, downloaded and re-circulated, and remains in circulation once copied even if the Council later withdraws it.	Surveillance, doorstepping, filming, graffiti and criminal damage, and in the most serious cases arson or assault. Occupants with no connection whatever to asylum accommodation are exposed, because none of the dispersed accommodation in the borough appears on the register.	Now 10 Published 20 Residual 10	Only Option A materially reduces this, and only in part. Obtain written advice from Warwickshire Police and place it before the decision maker. Agree a protocol for immediate removal of the dataset in the event of an incident, recognising that removal does not recall copies already taken.
T2	A person living at an address that must not be disclosed is located through the register.	The register is indexed by property and by licence holder, not by occupant, so it cannot be searched for a named person. Obtaining it requires attendance at the Town Hall or a traceable request. The protection is practical friction rather than any statutory prohibition, and it is incomplete, because these addresses were published online during the earlier period.	Every licensed address is searchable and mappable from any device, anonymously and without contact with the Council. Someone holding partial information, such as a street or an area, can narrow a search quickly and without leaving any record of having done so.	A person who moved for their own safety is found at their new address. Any licensed property in use as a refuge should be excluded from publication as a matter of course. Beyond that, it concerns individuals living in ordinary licensed shared houses: people who have left an abusive partner, people placed under homelessness or social care duties, care leavers, and people rehoused following harassment or intimidation. Consequences range from intimidation and assault to, in the most serious cases, death.	Now 10 Published 15 Residual 5	The exclusion exercise should be carried out now, not held as a condition of publication, because these addresses were published previously and the risk to any affected occupant may already be live. Agree the referral route with Housing Options, Adult and Children's Social Care, Warwickshire Police and registered providers, and a route for an occupant or landlord to request exclusion without explaining the reason in detail. The mechanism must then be operating before any further publication.

Ref	Risk	Position now, register not published online	Position if published online	Impact if the risk materialises	Score	Mitigation
T3	Occupants are subjected to harassment and intimidation falling short of criminal offending.	Occupants are not identifiable as such from any published source. Contact depends on local knowledge rather than on a list.	Occupants can be identified by address by anyone, including neighbours, campaigners, commercial parties and journalists.	Sustained doorstepping, filming, leafleting and abuse, with effects on mental health and on the sense of security at home. Individual incidents are unlikely to meet a criminal threshold, which makes them difficult for the Council or the Police to act on.	Now 6 Published 12 Residual 9	Publish reporting arrangements alongside any dataset. Agree a joint response with Warwickshire Police for occupants reporting harassment linked to publication. Brief front line teams so that such reports are escalated rather than treated as routine neighbour disputes.
T4	Children and other vulnerable occupants are exposed to disorder at or near the home.	Any disorder affecting an occupant is geographically incidental to where they live.	The home itself may become the focus of attention or of a gathering.	Children present during disorder at their own home. Disruption to schooling, harm to health and wellbeing, and potential safeguarding referrals arising from events the household did not cause.	Now 10 Published 15 Residual 10	Assess this expressly in the Data Protection Impact Assessment rather than treating occupants as a single undifferentiated group. Notify Children's Services of the publication decision. Avoid publication at a point of heightened local tension.
T5	Occupants disengage from the Council and stop reporting conditions in the property.	Occupants deal with the Council as the body that inspects and enforces on their behalf. The licensing regime depends on that relationship.	Occupants may associate the Council with the exposure of their address and may not distinguish between the Council's regulatory and publishing roles.	Disrepair, harassment and illegal eviction go unreported. Housing conditions deteriorate unobserved. The stated purpose of the licensing regime is undermined by the act of publishing the register that the regime produces.	Now 4 Published 12 Residual 8	Communicate the decision and its reasons to occupants as well as to landlords. Maintain a reporting route that does not require the occupant to give their address at first contact.

Ref	Risk	Position now, register not published online	Position if published online	Impact if the risk materialises	Score	Mitigation
T6	Occupants lose their home, through their own decision to leave or through the landlord ending the tenancy.	Tenancies are unaffected by the existence of the register.	Landlords may seek to end tenancies or change the use of the property to reduce attention, and occupants may leave of their own accord.	Loss of settled accommodation, homelessness applications to the Council, and disruption to employment and schooling. The cost falls on the Council as well as the household.	Now 4 Published 12 Residual 8	Model the potential demand with Housing Options before a decision is taken and present it to the decision maker as a cost as well as a harm.
T7	Publicity attending the decision makes a far larger number of people aware that the register exists and where to find it.	The earlier online publication was passive. It sat on the website, was not promoted, and attracted little attention. Awareness among the wider public is correspondingly low, and the withdrawal was not announced either.	The Leader has publicly described publication as something he intends to introduce, so the step will be reported as new whether or not it is. The Forward Plan entry required by Article 12.3, the Cabinet report and the media coverage all precede or accompany go live.	Many people who never knew the register was published become aware of it and are told where to find it. Use of the dataset is concentrated in the weeks immediately following publication, which is also when local attention and tension are at their highest. This risk acts as a multiplier on T1 to T4 rather than as a separate harm.	Now 4 Published 20 Residual 12	Largely outside the Council's control, since the framing of the decision is a matter for members and the press. Agree the communications position before the Forward Plan entry rather than after. If publication proceeds, consider phasing go live away from any period of heightened tension, and do not pair publication with promotion.

Assessment: owners, licence holders and managers

Ref	Risk	Position now, register not published online	Position if published online	Impact if the risk materialises	Score	Mitigation
L1	The licence holder or manager is identified at a home address.	The name and address are prescribed particulars and are already available on inspection or by copy, so they are not confidential. They are not, however, compiled into a searchable form.	Every licence holder's and manager's name and address, including the home addresses of individual landlords, sits in a single searchable dataset alongside the properties they hold.	Harassment and intimidation at home, extending to family members who have no connection with the business. Unsolicited commercial approaches. Where a property attracts hostility, the landlord is treated as the responsible party and located accordingly.	Now 6 Published 12 Residual 6	Option B withholds these particulars from publication and considers requests for them individually under section 232(5). Advise applicants at the point of application which particulars are prescribed and how the Council intends to handle them.

Ref	Risk	Position now, register not published online	Position if published online	Impact if the risk materialises	Score	Mitigation
L2	The property is damaged, with consequent cost and loss of rent.	The property is not identifiable as licensed from any published source.	The property is publicly identifiable as a licensed house in multiple occupation, which is the characteristic that attracts attention.	Criminal damage, arson, loss of rent during repair, and increased premiums or withdrawal of cover. A pattern of incidents could affect the insurability of licensed properties across the borough.	Now 8 Published 16 Residual 8	This risk cannot be mitigated by redaction, because it attaches to the property address. Removal protocol as at T1. The insurance market position should be established before a decision is taken.
L3	Compliant landlords bear exposure that non-compliant landlords avoid, creating a disincentive to apply for a licence.	Licensed and unlicensed properties are indistinguishable to the public, so compliance carries no public exposure.	Only licensed properties appear. Landlords who have complied are listed. Those who have not are absent from the list and remain unidentified.	A direct disincentive to apply for a licence, working against the enforcement objective the register exists to serve. Increased difficulty in bringing unlicensed properties into the regime, and a fairness objection that compliant landlords can reasonably make.	Now 3 Published 9 Residual 6	Recognise the perverse incentive expressly in the decision report. If publication proceeds, pair it with a communication making clear that absence from the register is not evidence that a property is lawful, and with a visible enforcement programme against unlicensed properties.
L4	Landlords withdraw from the licensed shared housing market.	No effect on market participation.	Some landlords may sell, revert properties to single household use, or decline to renew licences.	Reduction in available shared accommodation in a district where supply is already constrained, with consequent pressure on the Council's homelessness function and on the tenants displaced.	Now 3 Published 9 Residual 6	Test this with the landlord forum and in any consultation before a decision is taken, rather than assuming it will not occur.

Assessment: the Council

Ref	Risk	Position now, register not published online	Position if published online	Impact if the risk materialises	Score	Mitigation
C1	Personal data is processed unlawfully.	Processing is limited to what section 232 requires. The lawful basis is the legal obligation at Article 6(1)(c) and no impact assessment is required for the statutory minimum.	Publication to the world at large goes beyond the statutory duty. It must rest on Article 6(1)(e) and requires a documented necessity and proportionality case and a Data Protection Impact Assessment under Article 35.	Regulatory action by the Information Commissioner, compensation claims from affected individuals, and reputational damage. The absence of a completed impact assessment would be the first matter examined.	Now 4 Published 16 Residual 8	Complete the Data Protection Impact Assessment before any publication and obtain sign off from the Data Protection Officer. Record the lawful basis and the necessity and proportionality assessment. Apply data minimisation to the published fields.
C2	The Council is held responsible for harm to an occupant or a landlord.	The Council has not placed the information in the public domain, and the statutory access routes are those Parliament provided.	The Council has taken a positive and discretionary act to publish, in the knowledge of the risk and, potentially, against advice received.	Claims in negligence or under the Human Rights Act 1998, exposure to criticism at an inquest or public inquiry if serious harm follows, and an uncertain insurance position. The decision maker is personally exposed if advice was received and not followed.	Now 5 Published 15 Residual 10	Ensure the Police advice, the insurer response and the impact assessment are before the decision maker at the point of decision, and that the reasons and the alternatives considered are recorded. Obtain Legal advice on the final recommendation.
C3	The decision is challenged, whether the Council publishes or refuses to publish.	The current position is lawful and, so far as is known, unchallenged.	Either outcome may be challenged by judicial review or by complaint to the Information Commissioner, particularly if reasons are not recorded or advice not demonstrably considered.	Cost, delay, the decision being quashed and having to be retaken, and adverse publicity during the proceedings.	Now 8 Published 12 Residual 8	Take the decision through the correct formal route as set out at section 9, with reasons and alternatives recorded. Do not take the decision before the material at section 6 is available.

Ref	Risk	Position now, register not published online	Position if published online	Impact if the risk materialises	Score	Mitigation
C4	Community tension and reputational harm to the Council.	The matter is contested but largely contained within Cabinet and local media coverage.	The Council becomes the identifiable source of the list and is associated with whatever follows from its use.	Loss of confidence among tenants, landlords and partner agencies. Criticism from opposing directions simultaneously. Damage to working relationships with Warwickshire Police and the Home Office.	Now 12 Published 16 Residual 9	Agree a communications position in advance covering both outcomes. Coordinate with Warwickshire Police and partner agencies. Avoid publication at a point of heightened local tension.
C5	Insurance exposure.	Cover is in place on the current basis.	Insurers may attach conditions, increase premiums, or decline cover for consequences arising from publication.	Uninsured loss following an incident, increased cost, and restriction on the Council's freedom of action in a matter members expect to decide.	Now 4 Published 12 Residual 8	Obtain the insurer position in writing, including any conditions or exclusions that would apply following publication, and record it in the decision report.
C6	The Council is criticised for a lack of transparency.	The Leader has stated publicly at Cabinet his intention to publish the register online, and the matter has attracted local media coverage.	This risk largely falls away. Publication answers the transparency criticism directly.	Reduced member and public confidence, allegations of concealment, sustained requests and continuing media interest.	Now 12 Published 3 Residual 9	If publication is not pursued, publish a clear statement explaining the statutory position, the access routes that remain available, and the reasons for the decision, and commit to a stated review point.
C7	Volume of individual requests, with resource cost and exposure of front line staff.	Requests are handled individually, with officer time and occasional contentious contact.	Requests reduce. Section 21 of the Freedom of Information Act 2000 and the availability of the dataset would answer most of them.	Officer time diverted from licensing and enforcement, delay to casework, and exposure of reception and licensing staff to hostile contact.	Now 8 Published 4 Residual 6	Agree a standard handling process and a reasonable fee for certified copies. Consider sections 38 and 40 on the facts of each request. Brief front line staff on handling contentious contact.

Ref	Risk	Position now, register not published online	Position if published online	Impact if the risk materialises	Score	Mitigation
C8	Inaccurate or out of date entries are relied upon.	An error affects only the individual requester and can be corrected on the next request.	An error is visible to everyone, is copied and re-circulated, and cannot be recalled once taken.	A property wrongly shown as licensed or unlicensed. A property wrongly exposed. Complaints, and reliance by third parties on information the Council has told them not to rely on.	Now 6 Published 9 Residual 6	Validate the dataset before publication. Agree a refresh frequency and a named officer responsible for it. Publish the date the dataset was last updated, and a statement that the register is not a determination of whether a property is a licensable house in multiple occupation.

What the assessment shows

5.16 For tenants and occupiers every risk increases on publication, and none decreases. T1 and T2 carry an impact rating of 5 because each includes a risk to life, and T2 is the one least capable of being remedied afterwards, because a person who has been found cannot be un-found. T7 scores as highly as T1 on publication and is the risk most easily overlooked, because it is not about the data at all. The addresses were published before and attracted little notice. Presenting publication as a new step is what creates the awareness, and awareness is what turns an available dataset into a used one.

5.17 For owners and licence holders the exposure of home addresses at L1 can be removed by redaction under Option B, but the exposure of the properties themselves at L2 cannot, because it attaches to the address. L3 identifies a consequence that runs against the purpose of the register: publication exposes the landlords who have complied and leaves those who have not unidentified.

5.18 For the Council publication increases the data protection, liability, challenge, tension and insurance risks. It reduces the transparency criticism at C6 and the request handling burden at C7. Those two are the only risks in the whole assessment that publication improves, and both are risks to the Council's standing and workload rather than to any person's safety. The decision maker should be told that plainly, because the case for publication rests substantially on them.

5.19 A number of the risks that publication increases are risks of crime and disorder in the borough: T1 to T4 for occupants, L1 and L2 for owners and licence holders, and C4 for the Council, with T7 acting as a multiplier on T1 to T4. These are the matters to which section 17 of the Crime and Disorder Act 1998 requires the Council to have due regard, and which it must do all that it reasonably can to prevent, as set out at paragraphs 3.12 to 3.14. Even if publication proceeds on the basis recommended at section 8, T1, T4 and T7 remain in the high band, and the decision report should explain how that has been weighed in discharging the duty.

6. Advice and assessment required before a decision

6.1 The following must be obtained and placed before the decision maker. A decision taken without them would be difficult to defend if harm followed.

6.1.1 Written advice from Warwickshire Police on the risk of targeting of licensed properties in the district, including any current intelligence. This is also the principal evidence available to the Council on the likely effect of publication on crime and disorder, for the purposes of the duty at paragraph 3.12.

6.1.3 A completed Data Protection Impact Assessment addressing Options B and C, signed off by the Data Protection Officer. An equality impact assessment should be completed alongside it, for the reasons given at paragraph 3.15

6.1.4 Advice from Legal, and the view of the Monitoring Officer, on the recommendation, the decision route and the adequacy of the reasons recorded.

6.1.5 A request to the Home Office and its accommodation provider for the addresses of dispersed accommodation in the district, so that the Council can

assess whether any of those properties are licensable and whether any specific intelligence attaches to them. The Council does not currently hold this information.

6.1.6 An agreed communications position covering both outcomes.

6.1.7 A designed and agreed exclusion mechanism, so that a property can be withheld from any published dataset where the Council is aware of a protective reason. This must be operating before first publication rather than introduced after an incident.

7. Forward context

7.1 The Private Rented Sector Database created by the Renters' Rights Act 2025 opens for registration on 15 December 2026, with a phased regional rollout beginning with the West Midlands. The first stage provides access to landlords and local authorities. Wider public access and data sharing follow at a later stage. The Council's own register will therefore become progressively less significant as a source of this information, although not immediately as a public source.

7.2 Local government reorganisation in Warwickshire is paused. On 7 September 2026 the Secretary of State for Housing, Communities and Local Government made a statement to Parliament announcing a review of the reorganisation programme following updated legal advice. The decisions taken in the four Devolution Priority Programme areas were withdrawn, and the fourteen other areas, of which Warwickshire is one, were paused pending a rapid review by the Minister for Local Government, Devolution and Regional Growth. The July 2026 decision, under which the six Warwickshire councils would have been replaced by two unitary authorities with this Council forming part of a northern authority alongside North Warwickshire and Rugby, is therefore no longer a settled basis for planning.

7.3 Two consequences follow for this decision. The first is that this Council and its present functions continue for a period that cannot presently be dated. Elections in May 2027 will be held on existing council boundaries, and the shadow authority elections that were to precede reorganisation will not take place. The Secretary of State also stopped short of ruling out the retention of two-tier arrangements when asked directly. The Council should therefore proceed on the basis that it will own the register, any published dataset, the exclusion mechanism and the refresh process for a longer and currently indeterminate period, rather than until April 2028.

7.4 The second is that this removes the argument, available a week ago, that a publication route need not be built properly because it would shortly pass to a successor authority. It also removes the argument that the matter should be left to a successor authority to decide. The Council must decide it and must resource whatever it decides. If publication proceeds, the controls at T2, C7 and C8, being the exclusion mechanism, the request handling process and the named officer responsible for accuracy, have to be sustainable arrangements rather than transitional ones.

7.5 The Private Rented Sector Database remains the nearer and more certain change of the two, and it is unaffected by the pause. A decision on the register need not await the outcome of the reorganisation review, which one member has been given to understand may conclude within weeks, but neither should it be justified by reference

to reorganisation in either direction. [Placeholder: update this section once the outcome of the rapid review is known.]

7.6 Taken together, these factors support a decision that is recorded as capable of review, with a stated review point, rather than one framed as permanent.

8. Recommendation

8.1 That the register is not published online until the advice and assessment listed at section 6 have been obtained and considered.

8.2 That, once that material is available, a decision report is prepared setting out the three options, the advice received and this assessment, for determination through the route identified at section 9.

8.3 That, if the advice received does not support continued withholding, Option B is adopted as the minimum position, publishing the property address, licence reference number, permitted number of households and persons and the licence dates, and withholding licence holder and manager names and addresses, and that publication does not proceed until the exclusion mechanism described at T2 is in place and operating.

8.4 That any decision to publish includes a stated review point, a named officer responsible for the accuracy of the dataset, and an agreed protocol for immediate removal of the dataset in the event of an incident.

8.5 That the decision report states expressly the limitation identified at paragraph 3.10, so that the decision maker is not invited to treat non-publication as a complete mitigation.

8.6 That the decision report states expressly the position at paragraph 2.6, namely that publication would not provide transparency about dispersed asylum accommodation, because those properties do not appear on the register and the Council is not provided with their addresses.

8.7 That the exclusion exercise described at T2 is carried out now and not held as a condition of publication, since any property requiring exclusion may already have been published during the earlier period, and that Legal advice is taken on whether any entry identified can lawfully be withheld from inspection or from a copy supplied on request.

8.8 That the decision report addresses expressly, under their own headings, the duty at section 17 of the Crime and Disorder Act 1998 and the public sector equality duty at section 149 of the Equality Act 2010, as described at paragraphs 3.12 to 3.15, setting out the likely effect of each option on crime and disorder in the borough and the steps the Council will take to prevent it.

9. Decision route

9.1 This is an executive function, and the Constitution is explicit about where it sits. Article 8.1 provides that, with the exception of licensing and gambling policy under the Licensing Act 2003 and the Gambling Act 2005, all other licensing policy is an executive function discharged by Cabinet. Publication of the register maintained

under Part 2 of the Housing Act 2004 falls within that description. It is not a matter for the Licensing Committee or any other regulatory committee.

9.2 This now sits within Culture and Environment. Article 7.1 also provides that the Leader has power to take any executive decision of the Council, including decisions that could be taken by a portfolio holder, so the Leader could lawfully take this decision personally.

9.3 This is a key decision. Article 12.3 defines a key decision as one taken in the exercise of an executive function which either is likely to result in the Council incurring expenditure or making savings of one hundred and twenty-five thousand pounds or more, or is likely to be significant in terms of its effect on communities in any Borough Ward. The second limb is met. The Council's threshold is expressed by reference to any single ward, which is a lower threshold than the two or more wards formulation used by many authorities, and licensed properties are distributed across the Borough.

9.4 A key decision may only be taken in accordance with the Cabinet Procedure Rules at Part 4D and the Access to Information Procedure Rules at Part 4B. It must be entered on the Forward Plan and the required period of public notice given before the decision is taken. That has a practical consequence: the decision cannot be taken quickly, and the Forward Plan entry will itself make the proposal public before any decision is made.

9.5 An Individual Cabinet Member Decision under the protocol at Part 5H is available, and the Leader could take the decision under Article 7.1. Cabinet is nonetheless recommended, for three reasons. Article 8.1 identifies Cabinet as the body that discharges licensing policy. The proposal is contested, and a collective decision taken on a published report with recorded reasons affords the decision maker the protection described at C2. And the officer advice, the Police advice and the impact assessment would be before Cabinet as appendices, which is what Article 12.2 requires.

9.6 Article 12.2 sets out the Council's own principles of decision making: proportionality, due consultation and the taking of professional advice from officers, respect for human rights, a presumption in favour of openness, clarity of aims and desired outcomes, options offered for consideration explained, and reasons recorded. Two of those bear directly on this decision and pull in opposite directions. The presumption in favour of openness supports publication. The requirement to respect human rights, taken with the assessment at T1, T2 and T4, does not. The decision report should address both expressly rather than resting on the presumption of openness alone.

9.7 Although officer delegations exist for private sector housing functions, this should not be taken under officer delegation, given the level of public and member interest, the human rights dimension and the need for recorded reasons.

9.8 A Cabinet or individual Cabinet Member decision is subject to call in by the relevant Overview and Scrutiny Panel. Private sector housing sits within the remit of the Communities, Corporate Resources and Housing Overview and Scrutiny Panel. The decision should not be implemented until the call-in period has expired, and the publication itself should not go live before then.

9.9 Article 11.3 requires the Monitoring Officer, who at this Council is the Assistant Director Democracy and Governance, to report to Cabinet if a proposal, decision or omission would give rise to unlawfulness, and such a report has the effect of stopping

the proposal or decision being implemented until it has been considered. Given the data protection and human rights issues identified at section 3, the Monitoring Officer should be consulted on the draft decision report rather than only on the final version.

9.10 If publication required expenditure not provided for in the budget, Article 4.3(c) would require the matter to be referred to Full Council.

9.11 Whichever route is used, the record must set out the reasons for the decision and the alternative options considered and rejected and must show that regard has been had to the duties described at paragraphs 3.12 to 3.15.

Appendix B - Equality Impact Assessment - Screening

Name of Policy/Procedure/Service	Publication of the register of licences for Houses in Multiple Occupation
Service Unit	Planning, Enforcement and Public Services
Date of Implementation	4th November 2026

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	
Sex		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	□	Amber
Needs no further action	X	Green

Comments:

Before a decision is reached as to whether the register of licences for Houses in Multiple Occupation (HMO) is published, Cabinet must take into considerations its obligations under the Public Sector Equality Duty (as set out in the report).

The characteristics highlighted by this assessment that may be negatively impacted should option B or C be selected by Cabinet include race, age, disability and sex. Each person who posses one or more of the characteristics (who own, operate or reside in a HMO) could be made more vulnerable & at risk of harm should the details of the property be published online.

Adverse impact could also be caused if someone is fleeing anti-social behaviour, domestic violence, stalking etc and possess one or more of the characteristics above.

No further equality action is required at this stage, as the report outlines the equality and other factors Cabinet must consider.

Signed	
Officer completing assessment	Craig Dicken
Date	26th October 2026

Appendix C

HMO Register Publication Review

Data Protection Impact Assessment

Purpose

The Council is required under the Housing Act 2004 to maintain a register of licensed Houses of Multiple Occupation (HMOs) and make that register available for public inspection. Cabinet is considering whether the current arrangements should remain unchanged or whether some form of online publication should be introduced.

Whilst there is a statutory requirement to make the register available for inspection, there is no requirement that the full register must be published online. Any decision to publish information on the Council's website should therefore be assessed against the UK GDPR principles of lawfulness, necessity, proportionality, data minimisation and data protection by design.

The key consideration is whether publication of property-level information online is necessary to achieve the Council's transparency objectives, particularly where less intrusive alternatives may be available.

Options Considered

Option A - Status Quo

Maintain the current arrangements whereby the register is available upon request in accordance with Section 232 of the Housing Act 2004.

Benefits

- Lowest privacy and safeguarding risk.
- Prevents large-scale aggregation and mapping of HMO locations.
- Fully compliant with statutory inspection requirements.
- Information disclosed in a controlled manner.

Considerations

- Lowest level of proactive transparency.
- Information is less readily accessible to residents.

Option B - Reduced Dataset Publication

Publish a limited dataset online including:

- Licence reference number.
- Postcode sector only (e.g. CVXX XXX).
- Ward.
- Licence status.
- Licence issue and expiry dates.
- Permitted occupancy levels.

Exclude:

- Full property addresses.
- Licence holder names.
- Manager names.
- Correspondence addresses.

Benefits

- Increased transparency regarding HMO licensing activity.
- Supports public awareness and accountability.
- Reduces the risk of individual properties being identified and mapped.
- More closely aligns with the principles of data minimisation and privacy by design.

Considerations

- Does not provide information about specific properties.
- Some location-based analysis may still be possible at postcode-sector level.

Option C - Full Online Register

Publish the complete register online without redaction.

Benefits

- Highest level of transparency.
- Immediate public access to the full register.

Considerations

- Enables identification and mapping of licensed HMO properties.
- Information could be harvested, aggregated and republished by third parties.
- Potential for individual properties to become the focus of complaints, protests or unwanted attention.
- Increased safeguarding, privacy and reputational risks.
- More difficult to demonstrate compliance with the principles of necessity and proportionality where less intrusive alternatives exist.

Risk Assessment Summary

Risk Area	Option A	Option B	Option C
Privacy Risk	Low	Low-Medium	High
Safeguarding Risk	Low	Low	High
Data Aggregation / Mapping	Very Low	Low	Very High
Community Cohesion Risk	Low	Low-Medium	High
Reputational Risk	Low	Low	High
GDPR Compliance Risk	Low	Low	Medium-High
Overall Risk Rating	Low	Low-Medium	Very High

Key Data Protection Considerations

As part of the assessment, consideration has been given to:

- The purpose and intended benefits of online publication.

- Whether those benefits can be achieved through less intrusive means.
- The impact upon landlords, managing agents and occupiers.
- The ability for information to be aggregated, mapped and shared.
- Potential secondary use by social media platforms and third-party websites.
- Safeguarding implications for vulnerable residents.
- Equality and community cohesion considerations.
- The Council's obligations under UK GDPR and the Housing Act 2004.

Consideration should also be given to local circumstances and known sensitivities surrounding housing provision within communities. Whilst HMO licensing information is not special category data, wider publication of property-level information may increase the likelihood of properties being identified, mapped, shared and discussed beyond the Council's control.

Publication on the internet differs significantly from making information available through a controlled inspection process, as information may be copied, retained, redistributed and republished indefinitely.

Residual Risk Position

Option	Residual Risk Assessment
Option A	Within normal organisational risk tolerance.
Option B	Risks can be mitigated through routine governance controls and periodic review.
Option C	Significantly higher residual risks arising from unrestricted online publication and subsequent use of information by third parties.

Conclusion

All three options can support compliance with the Housing Act 2004, but they present different levels of transparency, accessibility, privacy risk and potential impact on affected individuals.

The decision requires a balance to be struck between the benefits of increased transparency and accessibility, and the identified privacy, safeguarding, community cohesion and reputational risks associated with each approach.

This DPIA is intended to ensure that Members are fully informed of those risks and considerations when determining the most appropriate approach to publication of the HMO register.

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 14

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Cabinet

Date of Meeting: 4th November 2026

Subject: Agile Working Policy

Portfolio: Resources and Internal Affairs

Responsible Officer: Chief Executive Officer

Corporate Plan – Theme: N/A – HR

Corporate Plan – Aim: N/A – HR

Ward Relevance: All

Public or Private: Public

Amendment to Budget: No **Council Tax Related:** No

Recommendation to Council: No

Forward Plan: Yes

Subject to Call-in: Yes

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1. Purpose of report

1.1. The purpose of this report is to seek Cabinet approval to undertake a structured review of the Council's current agile working arrangements to ensure they continue to support effective service delivery, accessibility for residents, and engagement with elected Members.

1.2. The review will consider how current arrangements are operating across services and identify whether any refinements may be required to support operational

effectiveness. No changes to the Council's Agile Working Policy are proposed as part of this report.

2. Recommendations

2.1. Cabinet is recommended to:

i. Note the current Agile Working arrangements, including the existing expectation that employees in hybrid-eligible roles attend a Council workplace or approved work location for a minimum of 60% of their working time, and note that the current 60% attendance requirement is an interim position pending the outcome of the ongoing review of Agile Working arrangements.

ii. Request Directors and Assistant Directors to undertake a review of services and roles as outlined in the report, within their areas to assess operational requirements, workplace attendance arrangements and service delivery needs.

iii. Request the Chief Executive to present the findings of the review, together with any recommendations arising, to a future meeting of Cabinet.

iv. Note that any proposed amendments to current working arrangements or policies will be subject to a separate report and decision-making process.

3. Background

3.1. The Council adopted the Agile Working Policy in 2015. The policy applies to all employees and provides a framework through which managers and employees can agree working arrangements that support service delivery whilst allowing work to be undertaken from a range of suitable locations, including Council offices, home and other work locations where appropriate.

3.2. The policy was introduced as part of a wider modernisation programme and identifies a number of intended benefits, including improved flexibility, more efficient use of accommodation, support for recruitment and retention, business continuity, employee wellbeing and sustainability.

3.3. Since its introduction, working practices across the public and private sectors have evolved significantly. Hybrid and agile working arrangements are now common amongst many local authorities and other large employers, although attendance requirements vary between organisations.

3.4. In August 2026, the Council clarified its attendance expectations and from September 2026 most employees have been expected to undertake face-to-face working for a minimum of 60% of their working time. This has been implemented within the existing Agile Working Policy framework and without amendment to the policy itself.

3.5. The Portfolio Holder confirmed that the administration has agreed an interim position with the Chief Executive which is for a minimum 60% attendance expectation for officers in roles suitable for hybrid working, and is thus an interim position pending the outcome of the review.

3.6. As a result, Cabinet wishes to obtain a clearer understanding of how agile working arrangements are operating across the organisation and whether current arrangements continue to meet service delivery requirements. The review will provide a consistent assessment of roles and service requirements to inform any future considerations relating to agile working arrangements.

4. Body of report and reason for recommendations

4.1. The Council is committed to ensuring that residents receive responsive, accessible and high-quality services and that elected Members are able to engage effectively with officers.

4.2. To support this objective, it is proposed that each service area undertakes a review of its current working arrangements. The review will consider the operational requirements of individual services and postholders in the service area, and the extent to which current attendance arrangements support service delivery. The scope will therefore cover fixed workplace or operational roles, community based roles and potentially hybrid roles.

4.3. The review will consider matters including:

- service delivery requirements;
- public-facing responsibilities;
- availability of staff throughout the working week;

- team collaboration, supervision and development;
- customer responsiveness and accessibility;
- accommodation and workspace requirements; and
- any service-specific operational issues.

4.4. Managers will complete assessments using a standard template supported by Human Resources. Directors and Assistant Directors will review submissions to ensure consistency and completeness before a consolidated report is prepared. The review will include service cover and skill mix for each working day; public access and customer contact; councillor and internal service responsiveness; as well as operational matters such as administration cover (telephone, inbox and appointment cover); collaboration, supervision, induction and handovers; outputs, quality and statutory deadlines; accommodation, ICT, accessibility, health and safety; workforce and equality effects; risks; and costs.

4.5. The findings of the review will be consolidated into a corporate assessment setting out role profiles, service requirements, key findings and any recommendations for future consideration by Cabinet. Subject to approval of the recommendations, Directors will aim to complete the process to enable a report to be issued before the end of the financial year. This will provide sufficient time for any call-in period, the development of assessment standards, completion of the assessment, preparation of the final report, and its submission for consideration. The proposed timetable has also been developed having regard to organisational capacity and the significant corporate programmes currently being progressed, including budget setting, Local Government Reorganisation, the LGA Peer Review, the Housing Regulator programme, internal and external audits, regeneration initiatives, the introduction of food waste collections, and changes to Planning Committee arrangements.

4.6. The review will provide an evidence base to inform any future decisions relating to agile working arrangements across the Council. The report can also be used as a good opportunity to provide an overview of the current workforce and establishment data. That can then be used to explain the difference between headcount, posts and roles so that coverage is auditable.

4.7. The recommendations within this report do not alter existing attendance expectations, the employment arrangements or

terms and conditions of employment, including any agreements under reasonable adjustment or statutory requests. It is also noted that subject to the review, some roles may support continued agile working; others may require greater or full attendance at a Council workplace or another specified location. No arrangement should be recommended for continuation unless the evidence shows that it meets the role and service requirements.

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

5.1. The proposals contained within this report have been discussed between Cabinet Members and senior officers.

5.2. The review process will involve Directors, Assistant Directors and service managers, with support and guidance provided by Human Resources.

5.3. Should the review identify proposals requiring changes to policy or working arrangements, appropriate consultation will be undertaken with employees and recognised Trade Unions in accordance with established procedures.

6. Financial Implications

6.1. There are no direct financial implications arising from the recommendations contained within this report.

6.2. Any financial implications identified through the review process will be reported to Cabinet as part of a future report.

7. Legal Implications

7.1. There are no direct legal implications arising from the recommendations contained in this report. It nevertheless has HR and governance implications that must be assessed before any change is implemented.

7.2. Any future proposals affecting terms and conditions of employment, working arrangements or Council policy will be subject to appropriate legal review and consultation before implementation.

8. Equalities implications

8.1. No specific equality implications have been identified at this stage. This report seeks approval to undertake a review of current arrangements. Any equality implications arising from future recommendations will be considered as part of any subsequent report to Cabinet.

9. Health implications

9.1. Commissioning the review does not itself change working arrangements. Each role assessment must identify relevant health, safety and wellbeing implications of the work location and proposed attendance pattern. Any future proposal must be supported by the appropriate assessment before a decision is made.

10. Environmental implications

10.1. No direct climate and/or environmental implications have been identified. The report back should identify any material effects of proposed arrangements on employee travel, building use, energy consumption or other relevant environmental matters, and include these in the appraisal of options.

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. If the recommendations are approved, the decision will bring the following benefits from a risk management perspective:

Improved understanding of workforce deployment across services.

Evidence-based consideration of any future changes to agile working arrangements.

Greater assurance that staffing arrangements support effective service delivery.

13. Human resources implications

13.1. No direct human resources implications arise from this report. The review will consider current workforce deployment arrangements and any future HR implications will be reported separately to Cabinet where appropriate. This decision does not itself change policy, employment terms or individual arrangements.

13.2. Human Resources will support the common assessment method and advise on workforce data and consultation.

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	Rejected as Members have expressed a desire to understand how the workforce is deployed, and to receive a to Cabinet at a future point.

17. Conclusion

17.1. The Council's Agile Working Policy remains in place, and no amendments are proposed through this report.

17.2. The proposed review will enable Cabinet to better understand how current arrangements are operating across services and

whether they continue to support effective service delivery, accessibility and organisational priorities.

17.3. The review findings will be reported back to Cabinet to inform any future consideration of agile working arrangements.

18. Appendices

18.1. Agile Working Policy (2015)

19. Background papers

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

20. Report Writer Details:

Officer Job Title: Chief Executive Officer

Officer Name: Tom Shardlow

Appendix A

Nuneaton & Bedworth

United to Achieve

Agile Working Policy

Issued by Human Resources
December 2015 **EMP40**

NUNEATON & BEDWORTH BOROUGH COUNCIL

Agile Working Policy

Quality Record

Issue No.	Date	Comments
1	5 June 2015	Initial Draft (Work style Group)
2.	23 Sept 2015	Management Team
3.	15 Oct 2015	Central Services Portfolio Holder
4.	16 Oct 2015	Trade Union Consultation
5.	27 Nov 2015	Equality Impact Assessment
6.	15 Dec 2015	Single Member Decision
7.		
8.		
9.		
10.		

NUNEATON & BEDWORTH BOROUGH COUNCIL

AGILE WORKING POLICY

INDEX **PAGE**

1. INTRODUCTION 3
2. PURPOSE 3
3. SCOPE 4
4. DEFINITIONS 4
5. BENEFITS 4
6. RESPONSIBILITIES 5
7. OPERATIONAL REQUIREMENTS 6
8. HEALTH & SAFETY REQUIREMENTS 10
9. ADDITIONAL INFORMATION 11
10. OTHER RELEVANT POLICIES AND DOCUMENTS 13

APPENDICES

A - GUIDANCE FOR MANAGERS 14
B - LETTER TO INSURERS 16
C - LETTER TO MORTGAGE LENDER, LANDLORD 17

1. INTRODUCTION

1.1 Nuneaton and Bedworth Borough Council is committed to delivering best value in service to our customers. Agile working will empower our employees to work where, when and how they choose, with maximum flexibility and minimum constraints, optimising performance. Working in line with our IT Strategy and changing technology, we aim to reduce costs, increase productivity and improve sustainability whilst continuing to meet the needs of our customers.

1.2 Agile working is based on the concept that work is an activity that we do, rather than a place we go. With this in mind, the flexibility allowed by this way of working will aid employees in their work/life balance.

1.3 Agile working means being able to work more efficiently, accessing required applications where ever you are and using the communications tool Skype for Business. This applies to all employees whether working remotely or in a fixed location as this tool will show availability and location status improving communication between all employees.

2. PURPOSE

2.1 This policy provides a framework for consistent and fair practice to address issues that should be taken into account when managing Employees and agile working implementations.

2.2 It enables the workforce to gain a better understanding of agile working and the basic principles to be considered and applied to specific roles.

2.3 Although Agile Working may incorporate flexible working practices, this policy does not negate or supersede the Flexible Working Policy of the Council that already exists for use by all Employees.

2.4 This policy does not replace the Home Working Scheme which is for use by Employees whose base is their home.

2.5 This document covers the provision of facilities by the Council to enable staff, working for (or on its behalf), to have secure and reliable access to any information systems which they have been authorised to use. Agile working enables staff to access such systems remotely (i.e. away from fixed NBBC locations) which in turn results in the more timely updating of systems, faster and better informed decision-making and improved overall efficiencies.

3. SCOPE

3.1 Agile working applies to all employees, whether permanent or temporary.

3.2 In order for agile working to become successfully embedded within teams, a mutual agreement must be reached between the staff member and Manager with regards to the logistics of the agile working arrangement. It is recommended that this agreement is held on the employees HR file.

4. DEFINITIONS

4.1 There are four Agile Work Styles that can be attributed to any role of the Council as follows:

- **Fixed -** A post holder permanently based in an office location because their role involves direct contact, face to face with internal/ external customers and suppliers
- **Flexible -** A job role with no requirement for a permanent workspace within the main area of work often referred to as “hot-desking” and frequently works in different locations internally and externally
- **Field -** A job role which can be delivered from any location at any given time (home, office, or any other location within the borough and spend a significant proportion of their working time on the move visiting sites or clients.
- **Home -** These roles are covered by the Home Working Scheme and will be those that are permanently and contractually classified as homeworkers.

5. BENEFITS

5.1 Agile working, when used effectively, delivers benefits to the Council and its Employees. It is a flexible and sustainable way of working with Employees who are not fixed to one location or desk and are provided with the tools to work anywhere, at any time, including the ability to work from home if the Employee so chooses.

5.2 Agile working can benefit services by matching Council needs with Employees preferred work style. This allows Employees to achieve a better balanced split between work and home life. However, not all Employees needs can be met as there is an overarching requirement to provide Council Services at the times and places necessary.

5.3 Employee benefits:

- potential for reduced travelling costs and travelling time
- potential for reduced stress (due to less travel)
- potential for increased free time (due to less travel)
- greater personal responsibility and job satisfaction
- increased flexibility in working life
- ability to work at home on a particular piece of work, avoiding the interruptions that can be part of the office environment.

- potential to provide a solution to a temporary problem where travel to the office is not possible.
- reduce the time spent travelling to specific meetings or sites
- the flexibility to care for a dependant such as dropping off or picking up a child from school in standard work day hours, catching up out of standard work day hours to suit. (NB. this needs to be as business needs allow)
- Increased sense of value as a result of autonomy and trust at work
- Increase in wellbeing and health – reduced stress, better sense of control, ability to integrate exercise into the day more easily, etc.

5.4 Council benefits:

- reduction in the need for office accommodation
- provision of a more effective service, owing to fewer interruptions and allowances for different Employees' productivity patterns
- new Employee attraction
- existing Employee retention
- use home working for a temporary period as a means of helping an Employee return to work following a long-term illness or disability.
- Enable learning and development activity to be undertaken remotely, including e-learning.
- Enable the Council to respond to an individual's need for flexibility in working arrangements, for example, to support staff with responsibilities as carers.
- Provide alternative solutions to short or longer term office accommodation issues.
- Reduction in organisation and personal carbon footprint
- Increased motivation and engagement of staff
- Improved Business Continuity – less disruption due to weather, travel problems, etc.

6. RESPONSIBILITIES

6.1 Managers

Managing employees in an agile working environment can be challenging, especially where contact may not be made in the traditional way. However, the management of performance of an agile worker should be no different to any other, i.e. the focus should be on what an employee achieves and how they achieve it.

The line Manager should establish clear arrangements for supervising the agile worker including;

- Setting clear objectives and targets in relation to the work to be completed;
- Implementing procedures, in consultation with the Employee, for monitoring the Employee's job performance and outputs and

recording hours worked, including the frequency of telephone contact and meetings with the Employee. Agile working should not impact the regularity of individual face to face meetings. These need to occur as they do now on a regular basis;
- Ensuring effective communication between the agile worker and other team members.

6.2 Employees

Employees should be clear and understand the following:

- What they are expected to do
- The method for agreeing/monitoring workload, e.g. one to ones, etc.
- How success/productivity will be measured
- What communication is required from them
- How their manager will communicate with them

Agile workers are responsible for, and are required to record the hours worked via timesheets, electronic diaries and/or other formal means as instructed by their line Manager. Existing policies that cover time away from duties, such as taking medical appointments, remain the same.

Home working may not be a suitable option for some Employees and there is no requirement for Employees to work from home.

Employees must not have any work related meetings in their own homes. This does not include any welfare meetings that may be appropriate if the employee is absent due to sickness.

7. Operational Requirements

7.1 Support

- Both Managers and Employees must ensure that working arrangements are effective and delivering the best possible customer service. Managers must continue to support Employees and both parties are responsible for maintaining good working relationships.

7.2 Communication

- Managers must put arrangements in place to ensure that all information is openly and frequently shared and that Employees remain briefed of corporate and team developments. Managers must also consider mechanisms for communication and networking between team members and other relevant parts of the Council.

7.3 Absence Reporting

- The Council's Managing Attendance Policy applies to all Employees regardless of their work style. All Employees must follow the processes contained within the Managing Attendance Policy.

- In the event of an accident, it is important to be able to ascertain whether an Employee was working or not for insurance purposes. Whilst this is a matter for all Employees it may be of particular relevance to those Employees who are not working in a fixed agile work style.

7.4 Performance Management

- There should be clear objectives and measurable outputs, set by Managers linked to service plans. These need to be reviewed by Managers and Employees through regular supervision, meetings and appraisals.

7.5 Equipment

- The Council will supply equipment needed to enable each Employee to work effectively in their respective work styles. Information technology and communications equipment must not be used by anyone other than the Employee who is authorised to do so.

- All Council policies apply to all Employees regardless of their work style, including the e-mail and Internet policies.

7.6 Business Mileage and Subsistence

- The Councils Business Mileage and Subsistence Policy will apply to all Employees

- All Employees will continue to have a designated base for travel claim purposes. This will be an existing Council location, unless the employee is a home worker.

7.7 Security of Data

- All data used must be secure in order to ensure compliance with the Data Protection Act 1998.

- Employees must comply with the requirements of the Computer and Data Protection policy.

7.8 Training and Development

- Through the personal development planning process along with regular contact meetings, Managers must ensure that all

Employees receive appropriate training in all areas to ensure the delivery of an efficient and effective service. It is important that all workers have access to regular training and development opportunities, including team development. Where required employees must attend training and development activities at the designated location.

7.9 Changing a Work Style

- A work style may change either permanently or temporarily as a result of:

  - An Employee moving into a different post
  - An Employee making a request to change their work style. In this event, the change will need to be mutually agreed between the Manager and Employee and must not have a detrimental effect on service delivery. This will also be dependant on availability of suitable IT equipment.
  - An Employee returning from long term sickness absence
  - An Employee being monitored in accordance with the Council's Capability policy
  - An Employee being subject to an internal disciplinary investigation

7.10 Housekeeping

- As all desks will be used by other Employees, it is essential that a "clear desk approach" needs to be adopted. All desks, keyboards and screens used must be left in a clean state for other users.

- Lockers will be provided so that Employees may securely store Council equipment and personal belongings

7.11 Hours of Work/Availability

- Employees and Managers must agree appropriate working patterns. Most teams will operate within the Council's Flexitime Scheme. In any event, any request to vary an agreed working pattern must be authorised by the Manager in advance.

- Flexible and Field Workers may work from home. If an Employee is working from home their availability times must be agreed. Any requirements of the Employee to make contact with the Manager/office must also be communicated and the Employee should ensure that they are contactable during the agreed hours by email and/or by telephone.

- When working at home the employee instructions detailed in the Flexitime Guidance for Employees should be observed. For

example taking rest breaks and maximum consecutive worked hours.

- When working at home the principles of flexitime still apply with arranged cover for office opening hours 0900 to1700 hours, Monday to Friday, provided. The maximum bandwidths 0730 to 1900 hours only apply when working from a council building and do not need to be adhered to at the Employees home however availability and cover for the service must have been agreed with the Service Manager.

- When working at home, Core time will still be 10.00 to 12.00 and 14:00 to 15:00 when working is required by all employees except those on authorised absence or working part time.

- The communications system (Skype for Business) must be kept up to date with the Employees' availability status and location during office opening hours (0900 to 1700 hours Monday to Friday) either automatically via Outlook calendar integration or manually if necessary.

- It should be noted that the IT Helpdesk will not be available 24/7 if any issues arise.

- All Employees have the right to privacy out of hours. There must be clarity about the times during which an Employee is available for contact and when / how often they should make contact with the Manager/office.

- It is likely that all routine meetings will take place at the office base. Managers can also request Employees to attend meetings at different venues, attend the office or be part of an audio conference remotely if required. Meetings must not be held at the Employees home.

- Flexible and Field Workers must retain the ability to attend the office to provide cover for annual leave or sickness absence and should not make personal commitments that could not be changed. For example, an employee should not commit themselves to caring for a dependant if this would not enable them to attend their office location if requested or required to do so.

7.12 Time Recording when working away from the normal contractual base

- Time should be recorded in the normal way; deducting breaks from work for private appointments to make up the agreed contractual hours

- Journey time to and from a work base is not counted as working time; rather this is personal commuting time. Travel time to other sites or locations is counted as working time, however when undertaking these journeys from home, the equivalent time of one journey to and from home should be deducted from the total travel time. Any time over and above one journey to and from the work base is counted as working time.

8. HEALTH & SAFETY REQUIREMENTS

8.1 Health & Safety at Work Act 1974 (HSWA)

- It is the Duty of the Council to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all Employees. Suitable and sufficient risk assessments must be carried out by the Employer. The purpose is to identify hazards, assess the probability that harm may arise from them and evaluate the effectiveness of control measures

- All Employees of the Council have a duty while at work to take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work; and to co-operate with the Council or other persons so far as is necessary to enable them to perform their duties or requirements under the HSWA

8.2 Health & Safety Risk Assessment

- To comply with all relevant health and safety legislation the Council must undertake appropriate risk assessments, including a DSE assessment for all remote locations, for each member of staff who is working in an agile manner. These risk assessments will look at the Employee's work activities, equipment and environment and if any issues are raised as a result of these risk assessments necessary action will be taken; this could include suspending agile working arrangements.

- All workstations within Council buildings are compliant with all relevant Heath & Safety [DSE] requirements, but will be subject to specific individual adjustment should the need arise.

- A DSE Assessment is to be carried out by any employee who is working/based at home. This will be undertaken by completing

an Assessment on AssessNET. Employees who work from two locations e.g., home and the office on a regular basis will be required to complete one DSE Assessment for each location. The DSE Assessment will be reviewed by the local DSE Assessor.

- This will need to be carried out again if any substantial changes are made to the working environment or arrangements. Employees must fully participate in completing the necessary risk assessment paperwork and review this with their Manager.

- Field workers/flexible workers who do not have a fixed desk arrangement will be provided with information, training and guidance to enable them to set up their workstation wherever they may be working.

- Due consideration to lone working arrangements should be explored fully between the Service Manager and Employee to ensure safe working arrangements are in place.

- When working from home, even if it is only on an ad-hoc basis, the Employee has a responsibility to ensure they have an appropriate workspace with adequate security, storage and screening from activities and noise in the rest of the home. There must also be adequate ventilation, lighting and heating.

For personal safety reasons, meetings with clients MUST not under any circumstances be held at the Employees' homes.

9. ADDITIONAL INFORMATION

9.1 Normal Contractual Base

- The Employee's contractual designated base will remain unchanged. Employees who have agile working arrangements which include working from home or from a non-Council site will continue to have a contractual base at an appropriate Council location.

9.2 Property and Liability Insurance

- Computers and other items of equipment provided by the Council as part of the agile working arrangement will be covered by the Council's insurance policy.

- Care and security of equipment should be observed when not working at the contractual base. Appropriate action will be taken if negligence is proved.

- Home workers are required to contact their own insurance company to inform them that they will be working at home. This does not usually result in an increase in premium and it is unlikely that working from home will affect cover. Any increase in premium that does result will not be covered by the Council. An example letter is attached if needed. (Appendix B).

- Liability insurance arranged by the Council will operate once the risk assessments are completed satisfactorily; Risk control measures identified as a result of risk assessment must be addressed prior to the agile working arrangement commencing.

- If an Employee has any personally adapted equipment (e.g. left-hand orientation or widescreen laptop) that they require in order to undertake their duties then this will be specifically allocated to them and will be for their use wherever they are working under this arrangement.

- Employees working at or from home are covered by the Council's Employer's Liability Policy. Any accidents must be reported immediately in accordance with the Council's health and safety guidelines.

- Before commencing any working from home, Employees should advise mortgagees or landlords that they intend to do so. The Council will not be responsible for any additional costs as a result, or liable for any outcomes that result from non-disclosure. An example letter is provided (See Appendix C).

- Using a room or part of a room at home to work in would not normally require planning permission.

- Working from home should not affect your payment of Council Tax.

9.3 Review

- Agile working arrangements should be reviewed as part of the annual PDR process, or earlier if deemed necessary.

- If problems arise every effort will be made to resolve these. However, in some cases, it may be necessary to terminate the agile working arrangement. If the agile working arrangement is terminated, the Employee will revert back to their previous working arrangement or Manager set arrangement

- Managers will only terminate agile working arrangements for sound business or performance reasons and after fully consulting the Employee. The termination should be agreed and noted on the Employees HR file.

10. OTHER RELEVANT POLICIES AND DOCUMENTS

The following policies and guidance are applicable to Agile working and should apply as appropriate

- Flexible Working Policy
- Managing Attendance Policy and Procedures
- Business Mileage & Subsistence Policy
- Adverse Weather Guidance
- Capability Procedure
- Dismissal & Disciplinary Policy & Procedures
- Flexitime Guidance
- Personal Development Review
- Corporate Induction Procedure
- Data Protection Policy
- Health and Safety Policies
- Display Screen Equipment at Work
- IT Policies
- IT Security Policy
- Equalities Policies
- DBS (Disclosure and Barring Service)
- Business Conduct Policy
- Confidentiality Policy
- Information Governance Framework Policy

AGILE WORKING - Guidance for Managers

In order for Agile Working to be successful, Managers should develop and create a culture of empowerment where employees are trusted to make responsible decisions regarding their work.

Some Agile Working arrangements, such as homeworking and mobile working, will result in little or no direct supervision of work. A high level of trust and confidence is expected between the line Manager and the Employee.

It is advisable to have in place arrangements that monitor work output and performance including effective workplace communication and support. Both parties need to recognise that the success of any arrangement will depend on this collaborative constructive relationship being in place and may require a different approach to supervision.

Managers should be aware that some staff may be uncomfortable with the change towards more agile working styles and find it difficult to lose their permanent workstation. Some Employees may need extra support during the transition period whilst they get used to the new way of working.

When considering the practicalities of agile working and in particular during initial discussions between the Manager and Employee, the following principles should be considered:

- There should be no adverse effect on the level and quality of service to the public/council/Employee or team.
- There should be tangible benefits for the public, council and/or the Employee.
- The work style chosen should be compatible with the amount of face-to-face contact and direct supervision required.
- The work style encourages greater levels of empowerment and responsibilities on Employees.
- It is advisable to have clear objectives and measurable outputs, which are set and regularly reviewed between Manager and the Employee.
- The total workload for the team needs to be considered as there should not be an increase to colleagues as a result of an Employee working away from a team base. The expectation is that productivity will increase from the new work styles.
- It must be safe for the work to be carried out (at home or when working in a mobile way) so health and safety assessments, including DSE assessments using the Borough Council's AssessNet software need to be made and any issues identified appropriately resolved. .
- Satisfactory arrangements need to be in place to protect confidential and personal information held on remote devices electronically and in physical form at home.

- Effective and secure communication arrangements with home/remote workers need to be maintained.
- Supervisory responsibility should not exclude Employees from consideration of agile working.
- Moving to agile working should not give rise to loss of grade, status or career prospects

APPENDIX B

HOME WORKING – LETTER TO INSURERS

Address Line 1
Address Line 2
Address Line 3
Address Line 4 <date>

Dear Sir

Insurance Policy No (where appropriate)

I have agreed with my employer, Nuneaton & Bedworth Borough Council that I will be working at home under the Council's Agile Working Policy.

The Council will provide me with items of office furniture and the following equipment to enable me to work at home.

(List all equipment)

The furniture and equipment remains the property of the Council, and is insured or self-insured by them in respect of property damage and third party liability risks.

I require written confirmation of receipt of this letter and acceptance of these terms. I would be grateful for an early response.

I would appreciate your confirmation that this will not affect in any way the validity or cost of my household insurance cover which is placed with you (policy number as above).

Yours sincerely

APPENDIX C

HOME WORKING LETTER TO MORTGAGE LENDER, LANDLORD, ETC

Address Line 1
Address Line 2
Address Line 3
Address Line 4 <date>

Dear Sir

Mortgage / Rent Reference Number (Where appropriate)

I have agreed with my employer, Nuneaton & Bedworth Borough Council that I will be working at home under the Council's Agile Working Policy.

The Council will provide me office furniture and the following items of equipment to enable me to work at home.

(List all equipment)

The furniture and equipment remains the property of the Council, and is insured or self-insured by them in respect of property damage and third party liability risks.

The area set aside in my home will not be used exclusively for business purposes and there will be no structural alterations to the property. There will not be a marked rise in traffic or in people visiting at the property and there will be no disturbance to neighbours as a result of my working from home.

I require written confirmation of receipt of this letter and acceptance of these terms. I would be grateful for an early response.

Yours sincerely