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Date: 29th October 2024

Dear Sir/Madam,

A meeting of the **CABINET** will be held in the Council Chamber, Town Hall, Nuneaton, on **Wednesday, 6th November 2024** at **6.00 p.m.**

Yours faithfully,

Tom Shardlow

Chief Executive

To: Members of Cabinet

Councillor Chris Watkins (Leader)	-	Housing
Councillor Jill Sheppard (Deputy Leader)	-	Environment and Public Services
Councillor Steve Hey	-	Resources and Customer Service
Councillor Tim Jenkins	-	Leisure, Communities and Health
Councillor Nicola King	-	Business and Regeneration
Councillor Robert Roze	-	Planning and Enforcement

Observer

Councillor Kris Wilson	-	Leader of the Main Opposition Group
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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 for interests that are declared regularly by members to be appended to the agenda (**Page 6**). Any interest noted in the Schedule at the back of the agenda papers will be deemed to have been declared and will be minuted as such by the Committee 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 9th October 2024 (**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. SAFEGUARDING POLICY a report of the Assistant Director – Governance and Democracy attached (**Page 16**)

7. REVOCATION OF LEICESTER ROAD GYRATORY AIR QUALITY MANAGEMENT AREA a report of the Assistant Director – Environment and Enforcement attached (**Page 50**)
8. HOUSING STRATEGY 2024-29 a report of the Assistant Director – Strategic Housing attached (**Page 132**)
9. CREATIVE EXPLORERS PROJECT UPDATE – report of the Assistant Director – Leisure and Recreation attached (**Page 231**)
10. GENERAL FUND BUDGET MONITORING Q2 a report of the Assistant Director – Finance attached (**Page 239**)
11. HRA BUDGET MONITORING Q2 - report of the Assistant Director – Finance attached (**Page 248**)
12. CAPITAL MONITORING Q2 - report of the Assistant Director – Finance attached (**Page 258**)
13. RECOMMENDATIONS FROM OVERVIEW AND SCRUTINY PANELS
None
14. ANY OTHER ITEMS - which in the opinion of the Chair of the meeting should be considered as a matter of urgency because of special circumstances (which must be specified)

Nuneaton and Bedworth Borough Council

Building A Better Borough

Nuneaton and Bedworth 2032: working in partnership, restoring pride in our borough

AIM 1: LIVE

We want to make our borough a place where our residents enjoy living and in which others choose to make their home.

Priority 1: Promote residents' health and wellbeing

Priority 2: Enable appropriate housing development

Priority 3: Sponsor a sustainable green approach

Priority 4: Prioritise community safety and empowerment

AIM 2: WORK

Using our prime location within the national road and rail networks and responding to the needs of private companies, we want to make our borough a place in which businesses choose to locate and where our residents enjoy a range of employment options.

Priority 1: Grow a strong and inclusive economy

Priority 2: Champion education and skills

Priority 3: Embrace new and emerging technology

Priority 4: Support local businesses

AIM 3: VISIT

Taking advantage of our open green spaces, our heritage, and our location within the West Midlands, we want our borough to be a vibrant destination for residents and visitors alike. A place where people and families want to spend time relaxing, socialising and taking part in leisure and cultural activities.

Priority 1: Create vibrant and diverse town centres

Priority 2: Stimulate regeneration

Priority 3: Celebrate and promote our heritage

Priority 4: Improve the physical environment

Cabinet - Schedule of Declarations of Interests – 2024/2025

	Name of Councillor	Disclosable Pecuniary Interest	Other Personal Interest	Dispensation
	General dispensations granted to all members under s.33 of the Localism Act 2011			Granted to all members of the Council in the areas of: <ul style="list-style-type: none"> - Housing matters - Statutory sick pay under Part XI of the Social Security Contributions and Benefits Act 1992 - An allowance, payment given to members - An indemnity given to members - Any ceremonial honour given to members - Setting council tax or a precept under the Local Government Finance Act 1992 - Planning and Licensing matters - Allotments - Local Enterprise Partnership
	S. Hey	Director – - Heywire Ltd - Brilliant Bookings Ltd	Member of the Labour Party, National Trust, CAMRA (Campaign for Real Ale), Royal Photographic Society. Representative on the following Outside Bodies: <ul style="list-style-type: none"> • West Midlands Employers Board (NBBC representative) • Local Government Superannuation Scheme Consultative Board • Grayson Place (NBBC) Limited • West Midlands Employers • Nuneaton and Bedworth Older People’s Forum 	
	T. Jenkins	Managing Partner – Gribblybugs LLP	The Labour Party (sponsorship) - Committee Member of Warwickshire Amphibian & Reptile Team - Member of Warwickshire Wildlife Trust - Member of Equity – Trade Union Members of National Trust and English Heritage Representative on the following Outside Bodies:	

	Name of Councillor	Disclosable Pecuniary Interest	Other Personal Interest	Dispensation
			<ul style="list-style-type: none"> • Nuneaton and Bedworth Sports Forum, • Safer Warwickshire Partnership Board, • Warwickshire Health and Wellbeing Board, • Warwickshire Police and Crime Panel, • Biodiversity Champion • Committee of Management of Hartshill and Nuneaton Recreation Ground • Exhall Education Foundation • Foleshill Charity Trustee – Proffitt's Charity 	
	N. King	Employed by Love Hair and Beauty	Representative on the following Outside Bodies: <ul style="list-style-type: none"> • Nuneaton Town Deal Board 	
	R. Roze	Director – InfiniTEN Ltd	Representative on the following Outside Bodies: <ul style="list-style-type: none"> • A5 Member Partnership • Nuneaton and Bedworth Community Enterprises Ltd • PATROL (Parking and Traffic Regulations Outside of London) Joint Committee Services. • Building Control Partnership Steering Group • Bedworth Town Deal Board 	
	J. Sheppard		Representative on the following Outside Bodies: <ul style="list-style-type: none"> • Sherbourne Asset Co Shareholder Committee • Warwickshire Direct Partnership • Warwickshire Waste Partnership • Nuneaton Neighbour Watch Committee 	
Director of Wembrook Community Centre.			Dispensation to speak and vote on any matters of Borough Plan that relate to the Directorship of Wembrook Community Centre	
Member of Labour Party				

	Name of Councillor	Disclosable Pecuniary Interest	Other Personal Interest	Dispensation
	C.M. Watkins	Employee of Nutri Pack	Representative on the following outside bodies: <ul style="list-style-type: none"> • Nuneaton and Bedworth Community Enterprises Ltd. (NABCEL) • Coventry, Warwickshire and Hinckley and Bosworth Joint Committee • Local Government Association • Nuneaton and Bedworth Home Improvement Agency • Nuneaton and Bedworth Safer and Stronger Communities Partnership • Nuneaton and Bedworth Community Enterprises Ltd • Warwickshire Housing Support Partnership • West Midlands Combined Authority Board (WMCA) • West Midland Combined Housing and Land delivery Board 	

NUNEATON AND BEDWORTH BOROUGH COUNCIL

CABINET

9th October 2024

A meeting of Cabinet was held on Wednesday 9th October, 2024 in the Council Chamber at the Town Hall.

Present

Councillor J. Sheppard (Deputy Leader and Environment & Public Services)
Councillor S. Hey (Resources & Customer Services)
Councillor R. Roze (Planning & Enforcement)
Councillor N. King (Business and Regeneration)

CB37 Apologies

Councillor C. Watkins (Leader and Housing) and Councillor T. Jenkins (Leisure, Communities and Health)

CB38 Declarations of Interest

RESOLVED that the Declarations of Interest for this meeting are as set out in the Schedule attached to these minutes.

CB39 Minutes

RESOLVED that the minutes of the Cabinet meeting held on 11th September 2024, be approved, and signed by the Chair subject to an amendment at CB29 to read '17th July 2024'

CB40 Museum Operational Hours

The Strategy Director – Public Services submitted a report recommending to approve the change in museum operational hours from April 2025

RESOLVED that

- a) the proposed operational hours for the museum be approved as per section 4.1 of the report; and
- b) Delegated Authority be given to the Assistant Director – Recreation and Culture in consultation with the Assistant Director – Finance and Portfolio Holder for Leisure, Communities and health to restructure the museum to accommodate the operational hours.

Speakers:

Mr K. Kondakor
Mr P. Smith
Councillor Michele Kondakor

Options

- a) the recommendations are not approved and
- b) alternative opening times be proposed

Reasons

The museum has been operating on seasonal hours and significantly reduced hours for the last 18 months, following several vacancies and a recruitment freeze. This has led to the museum opening hours being inconsistent and running the museum on skeleton staff.

CB41 Nuneaton Markets Operations

The Assistant Director – Economy and Regeneration submitted a report to Cabinet outlining the proposal to move the Market operation to a fully self-supply and erect model of market stall set up and the financial implications.

RESOLVED that the proposed move to a self-erect model by January 2025 be approved.

Speakers:

Mr K. Kondakor
Mrs B. Tooby
Mr P. Smith
Councillor Michael Bird
Councillor Michele Kondakor

Options

- 1) Continue with the existing model of operation which would present a significant financial burden on the general fund.
- 2) Investigate other operating models. Please note external operator model already considered and rejected.

Reasons

Falling trader numbers across the UK, together with pressures on Local Authority funding and rising operational costs, necessitate a review of the current operation of our town centre markets. We aim to consider all alternative options for the future delivery of the service to ensure value for money and resilience. We want to provide opportunities for markets to thrive as town centres evolve in the face of the changing retail and town centres landscape.

CB42 Green Bin Update

The Strategic Director – Public Services presented to Cabinet an update on the Green Bin service.

RESOLVED that the following be noted :-

- a) a review of the green bin charges to take place as part of the Council's annual process of reviewing all its fees and charges.
- b) to ensure the service is meeting the needs and expectations of residents, a full review of the service, including a public consultation will take place in June and July 2025. This review will also examine the impact of the mandatory requirements on food waste collections.

- c) the portfolio holder will be undertaking a review of the impact of food waste collections for the Borough, working with the Environment and Leisure Overview and Scrutiny Panel.

Speakers

Mr K. Kondakor
Councillor Michele Kondakor

Options

N/A

Reasons

The price of the service has remained unchanged since its introduction in 2018 and has never been reviewed. The Environment Bill 2001 will require the Council, as a waste collection authority, to collect food waste through a separate weekly collection. The Green Bin will no longer be able to accept food waste once a weekly food waste collection service is implemented.

CB43 Bedworth Physical Activity Hub (BPAH)

The Strategic Director – Public Services provided and update to the Leisure Development update in relation to Bedworth Physical Activity Hub and leisure management procurement timetable.

RESOLVED that

- a) the progress on the BPAH be noted and further reports and updates be brought back to Cabinet as appropriate; and
- b) the progress on the Leisure Procurement be noted and further updates be brought back to Cabinet as applicable on the final procurement outcomes

Speakers

Mr K. Kondakor
Mr P. Smith
Councillor Michele Kondakor

Options

Note the update reports
Do not accept the updates

Reasons

To note the progress made on the BPAH project and Leisure Operator procurement activities.

CB44 Council Tax Premium Charges

The Assistant Director – Finance submitted a report to Cabinet seeking approval to introduce an additional levy on the Council Tax charge from April 2025 for long term empty dwellings and second homes from April 2026

RESOLVED that

- a) the proposed change to introduce an additional levy of 100% on properties empty for a period in excess of 12 months from April 2025 be approved.
- b) the proposed change to introduce an additional levy of 200% on properties empty for a period in excess of 5 years from April 2025 be approved.
- c) the proposed change to introduce an additional levy of 300% on properties empty for a period in excess of 10 years from April 2025 be approved.
- d) the proposal to remove the 100% discount that is applied for the first 14 days that a property is empty and unfurnished from April 2025 be approved.
- e) the introduction of the Second Homes Levy up to a maximum of 100% from April 2026 be approved.
- f) a brief consultation process as outlined at paragraph 4 of the report be approved.

Speakers

Mr K. Kondakor
Mr P. Smith
Councillor M. Kondakor

Options

To accept the report; or
To oppose the recommendations

Reasons

To reduce empty homes across the Borough

CB45 Recommendations From Overview and Scrutiny Panels

None

CB46 Any Other Items

None

Chair

PUBLICATION DATE: 14TH OCTOBER 2024

DECISIONS COME INTO FORCE: 22ND October 2024

Cabinet - Schedule of Declarations of Interests – 2024/2025

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	N. King	Employed by Love Hair and Beauty	Representative on the following Outside Bodies: <ul style="list-style-type: none"> • Nuneaton Town Deal Board 	
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Director of Wembrook Community Centre.			Dispensation to speak and vote on any matters of Borough Plan that relate to the Directorship of Wembrook Community Centre	
Member of Labour Party				

	Name of Councillor	Disclosable Pecuniary Interest	Other Personal Interest	Dispensation
	C.M. Watkins	Employee of Nutri Pack	<p>Representative on the following outside bodies:</p> <ul style="list-style-type: none"> • Nuneaton and Bedworth Community Enterprises Ltd. (NABCEL) • Coventry, Warwickshire and Hinckley and Bosworth Joint Committee • Local Government Association • Nuneaton and Bedworth Home Improvement Agency • Nuneaton and Bedworth Safer and Stronger Communities Partnership • Nuneaton and Bedworth Community Enterprises Ltd • Warwickshire Housing Support Partnership • West Midlands Combined Authority Board (WMCA) • West Midland Combined Housing and Land delivery Board 	

Cabinet/Individual Cabinet Member Decision

Report Summary Sheet

Date: 6th November 2024

Subject: Safeguarding Policy

Portfolio: Resources and Customer Service

From: Assistant Director – Democracy and Governance

Summary: To seek approval of the Councils updated Safeguarding Policy.

Recommendations: That Cabinet approve the Safeguarding Policy for adoption across the Council.

Options:

- 1) Approve the Safeguarding Policy
- 2) Do not approve the Safeguarding Policy

Reasons: To ensure the Council has a Safeguarding Policy in place in order to set out its approach to Safeguarding concerns when they arise and to ensure the wellbeing and safety of both children and adults, within the responsibility of the Council, remain safeguarded.

Consultation undertaken with Members/Officers/Stakeholders

Management Team – 15th October 2024
Human Resources
Portfolio Holder for Resources and Customer Service

Subject to call-in:

Yes

Ward relevance:

All

Forward plan:

Yes

Building a Better Borough Aim:

1 - Live

Building a Better Borough Priority:

1 - Promote residents' health and wellbeing

Relevant statutes or policy:

Children Acts 1989 & 2004

Care Act 2014

Working Together 2023 (Government Statutory Guidance for multi-agency working)

Equalities Implications:

No equality implications have been identified.

Human resources implications:

No direct Human Resources implications.

Financial implications:

No direct financial implications.

Health Inequalities Implications:

Implementing the Safeguarding Policy will ensure the Council have process in place to identify abuse & neglect and improve the health and wellbeing of the residents of the Borough.

Section 17 Crime & Disorder Implications:

None identified

Risk management implications:

Not having a Policy in place could result in allegations the Council is not taking its safeguarding responsibilities seriously. A Policy not only sets out our compliance with legislation but what, as a Council, we expect of our employees, elected members, contractors and other relevant stakeholders when dealing with safeguarding issues.

Environmental implications:

None identified

Legal implications:

- The Council is required under the Children Act 2004 to fulfil its obligations under the Act to safeguard and protect the welfare of children. Having a Policy in place sets out our commitment to complying with this legislation.
- Working Together 2023 (statutory guidance) places further responsibilities on the Council to safeguard children while discharging its functions.
- The Care Act 2014 places responsibilities on the Council due to being a Housing provider and requires the Council to work effectively with other agencies to ensure adults are provided with adequate care and support (where safeguarding concerns are present).

Contact details: Craig Dicken, Equality and Safeguarding Officer

craig.dicken@nuneatonandbedworth.gov.uk

02476376333

AGENDA ITEM NO.6

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Cabinet 6th November 2024

From: Assistant Director – Democracy and Governance

Subject: Safeguarding Policy

Portfolio: Resources and Customer Service

Building a Better Borough Aim: 1 - Live

Building a Better Borough Priority: 1 - Promote residents' health and wellbeing

1. Purpose of Report

1.1 To seek approval of Cabinet of the revised Safeguarding Policy.

2. Recommendations

2.1 That Cabinet approve the Safeguarding Policy for adoption across the Council.

3. Background

3.1 It has been several years since the Safeguarding Policy was reviewed/updated.

3.2 During this time, numerous changes have taken place both internally and external to the Council. Due to this, the previous Safeguarding Policy was reviewed, and it was determined a rewrite of the Policy was needed.

3.3 While there has been changes in legislation, revisions to Government and Warwickshire guidance and documentation, the Council does not now provide many services where it would directly provide a service which supervises children e.g. Breakaway Club, Play rangers. This has resulted in guidance related to this activity being removed from the Policy and reduced the size of the document.

3.4 Should the Council, in the future, carry out any activities which requires Officers to directly supervise children, there are procedures/guidance produced by the Safeguarding Warwickshire Boards which the Council would follow/adhere to.

4. Body of Report

4.1 As a summary of the Policy:

4.1.1. The Policy sets out Responsible Officers for Safeguarding within the Council and information on other agencies involved with safeguarding in Warwickshire.

4.1.2. There is a section on the relevant legislation in respect of Safeguarding.

4.1.3. The definitions of abuse are set out in respect of Safeguarding Children and Adults. Other definitions in relation to Safeguarding are detailed.

4.1.4. The NBBC reporting procedures are detailed, both within NBBC and then to other statutory agencies.

4.1.5. Guidance is provided to Employees, Members and Volunteers on the following issues:

- Professional Curiosity
- Safe Working Practices for Council Employees
- How to Respond to Disclosures
- Looking After Yourself (as an employee)
- Suicide Threats
- Escalation Procedure

4.1.6. The following information in respect of issues in relation to safer recruitment & employment:

- Recruitment and Selection
- Disclosure and Barring Service (DBS)
- Supervision and Annual Development Review
- Induction and Training
- External Clubs / Organisations using Borough Council facilities
- Use of Contractors
- Allegations against a member of Staff
- Allegations against people who work with adults at risk
- General Data Protection Regulations (GDPR)
- Photography/image recording

4.1.7. The appendix to the Policy includes the Multi Agency Contact form (which is the form used to make a referral to Children Services). There are currently no referral forms for Safeguarding Adult Referrals or Mental Health.

4.1.8. The NBBC referral form is now an on-line form on DASH, which employees and elected members can complete to share any safeguarding concerns they have.

5. Conclusion

5.1 The Safeguarding Policy has been revised and updated to reflect current practices and arrangements within the Council.

5.2 It is therefore recommended that Cabinet approve the Policy for adoption across the Council.

6. Appendices

6.1 Safeguarding Policy – Appendix A.



Safeguarding Policy & Guidance

SEPTEMBER 2024

Craig Dicken
Equality and Safeguarding Officer
Town Hall, Coton Road
Nuneaton, Warks
CV11 5AA

Telephone: 024 7637 6333

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Introduction

Nuneaton and Bedworth Borough Council is committed to the protection and safeguarding of children, young people and adults at risk.

This Policy documents the arrangements for safeguarding activity and outlines the Authority's responsibilities and procedures for its employees and elected Members.

Safeguarding is everyone's responsibility, and the Borough Council will ensure that its employees, elected Members and everyone associated with the provision of its services will take all reasonable steps to protect and safeguard children, young people and adults at risk from harm, discrimination or degrading treatment and ensure that their rights, wishes and feelings will be respected.

This Policy is written in reflection of the following legislation & documentation:

- Working Together to Safeguard Children 2023
- Children and Social Work Act 2017
- The Care Act 2014
- Children Act 1989 & 2004
- Domestic Abuse Act 2021
- Modern Slavery Act 2015

Child Protection

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes (Source: Working Together 2023 and the Children and Social Work Act 2017)
- A "child" is defined as any young person under the age of 18 years (including unborn children).

Adult Safeguarding

This involves people and organisations working together to stop abuse and neglect occurring and intervening effectively in situations where there is risk of abuse or neglect, or where abuse is seen to be taking place. The Care Act 2014 sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect. An "adult at risk" is any adult, aged 18 years or over, who:

- Has a need for care and support (whether or not the local authority is meeting any of those needs) and:
 - Is experiencing, or at risk of, abuse or neglect; and
 - As a result of those care and support needs, is unable to protect themselves from either the risk, or the experience, of abuse or neglect.

"Care and support" are the mixture of practical, financial and emotional support for

adults who need extra help to manage their lives and be independent, including older people, people with a disability or long-term illness, people with mental health problems and carers. Care and support include an assessment of people's needs, provision of services and the allocation of funds to enable a person to purchase their own care and support. It could include care home, home care, personal assistants, day services, or the provision of aids and adaptations (Care Act 2014).

When supporting an adult at risk it is essential that their wishes are understood and acknowledged. This is critical to ensuring that the approach that an Officer or an organisation takes is the right one. This is called "making safeguarding personal". Making safeguarding personal is about talking people through the options they have and what they want to do about their situation. Before deciding what needs to be done, the views of the adult at risk need to be explored and understood.

Responsible Officers and Partnership Arrangements

Strategic Director – Corporate Resources

The Strategic Director for Corporate Resources has ultimate responsibility for safeguarding activities within the Council and is the designated Safeguarding Champion for the Council.

Assistant Director responsible for Democracy and Governance

The Assistance Director for Democracy and Governance has the responsibility for the safeguarding function within the Council. They oversee the operational safeguarding activities. The Assistant Director, in the absence of the Equality and Safeguarding Officer, will act as the deputy for liaison with Warwickshire Front Door and will deal with referrals to and requests for information from the Warwickshire Front Door and other statutory agencies.

Elected Member Safeguarding Champion

The champion is nominated at full Council every year and is normally the Portfolio Holder for Resources and Customer Service. The Champion acts as the member lead on safeguarding issues both internal and external to the Council and is responsible for ensuring that the Council has the relevant policies in place to ensure compliance with the relevant legislation.

Equality and Safeguarding Officer

The Equality and Safeguarding Officer carries out the operational activities for safeguarding within the Council. The post is the allocated Single Point of Contact (SPOC) for liaison with Warwickshire Front Door and will deal with referrals to and requests for information from the Front Door & other relevant agencies. The Equality and Safeguarding Officer is the Council's representative at the Warwickshire Safeguarding Partnership meetings and lead Officer on related partnership working & responding to information requests for Safeguarding Practice Reviews. The post holder also deals with any allegations relating to safeguarding in accordance with the procedures of the Warwickshire Safeguarding Partnerships and the Council's procedures. The post holder would act as a liaison between the Local Authority Designated Officer regarding allegations made against Council employees.

Support Officers for Specific Point of Contact

Support Officers across the Council have been nominated to support the SPOC in supplying information to the Warwickshire Front Door. Once a request for information is made by the SPOC, they will supply the requested information from the data they hold on to a child/adult/family.

Strategic Directors & Assistant Directors

Strategic Directors & Assistant Directors are required to consider the impact of their policies, procedures and services on children and adults with care and support needs. They must ensure compliance with this policy.

Other Council Employees

Council employees are responsible to report any safeguarding concerns they have to the Equality and Safeguarding Officer, People Services Manager, Human Resources or the Safeguarding Champion.

Warwickshire Safeguarding Boards

The countywide arrangements for safeguarding adults and children are overseen by the respective Warwickshire Safeguarding Adult and Children Boards.

Warwickshire Front Door (Front Door)

In Warwickshire, a new integrated "Front Door" has replaced the Multi Agency Safeguarding Hub (MASH) as the first point of contact for safeguarding concerns for children and young people. This brings together Early Help and Children's Social Care to ensure that children and young people receive the right support at the right time. The "Front Door" incorporates the MASH function and is a partnership between the County Council, Warwickshire Police, Health and other key partners.

The Front Door does deal with Adult Safeguarding concerns however the main mechanisms for referrals for Adult Safeguarding concerns would be made to Adult Social Care or Mental Health Services.

Legislation Overview

Children Act (1989 & 2004)

The Children Act of 1989 was introduced to give a comprehensive legal framework for Protecting Children and securing their lives and futures. The Children Act 2004 is an extension of the 1989 Act and enhances & strengthens legislation.

The Borough Council has a duty under Section 11 of the Children Act 2004 to ensure that it considers the need to safeguard and promote the welfare of children when carrying out its functions and that it will act as part of the Warwickshire Safeguarding arrangements.

Working Together to Safeguard Children 2023

Working Together to Safeguard Children (usually referred to as Working Together) is statutory guidance produced by the government which outlines how practitioners working with children, young people and families should work together in order to ensure that children and young people remain safe from harm. This document has been reviewed & updated regularly sets out the requirements of the Council to fulfil its role in safeguarding children, the latest version being in 2023.

The Children and Social Work Act 2017

This legislation introduced new, flexible arrangements for safeguarding children. The County Council, Chief Officer for Police and Clinical Commissioning Groups have an equal and shared duty to work together in partnership with other relevant agencies to safeguard and promote the welfare of all children in a local area.

Care Act 2014

The Care Act 2014 is a reform of care and support in Britain. It sets out local authorities' duties in relation to assessing people's needs and their eligibility for publicly funded care and support. The Act created a consistent route to establishing an entitlement to public care and support for all adults with needs for care and support and produced the first ever entitlement to support for carers, on a similar basis.

Domestic Abuse Act 2021

This legislation improves and enhances protection for victims of domestic abuse. It introduces a number of requirements on public bodies including the Council. These requirements have been included within Council Policy, mainly relating to Housing and Homelessness however it is recognised that the whole Authority has a role to play in respect of the Domestic Abuse Act.

Modern Slavery Act 2015

The Modern Slavery Act 2015 is a piece of legislation designed to combat modern slavery and human trafficking. Section 54 of Act requires certain organisations to develop a Modern Slavery and Human Trafficking Statement each year.

The Statement must set out what steps the organisation has taken during the previous financial year to mitigate modern slavery in any part of its business or supply chain. It is a requirement for any organisation which supply goods or services and have a total turnover of not less than £36m to create and publish a statement.

Definitions of Abuse

Within child protection and adult safeguarding, there are various forms of abuse. The definitions of these are set out below:

Child Protection

Physical Abuse: Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional Abuse: Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to the child they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on the child. These may include interactions that are beyond the child's developmental capability, as well as over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another, bullying (including cyber bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Neglect: Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food and clothing,
- provide shelter including exclusion from home or abandonment,
- protect a child from physical and emotional harm or danger,
- ensure adequate supervision including the use of inadequate care-takers,
- provide appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to a child's basic emotional needs.

Sexual Abuse: Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (e.g., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities such as involving children in looking at, or in the production of pornographic material, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Safeguarding Adults

Physical abuse: Physical abuse is the use of physical force or mistreatment of one person by another which may, or may not, result in actual physical injury. This may include assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

Domestic abuse: Domestic abuse is when someone you are in a close relationship with behaves in a way that causes psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.

Sexual abuse: Sexual abuse is any behaviour perceived to be of a sexual nature which is unwanted or takes place without consent or understanding. Sexual violence and abuse can take many forms and may include non-contact sexual activities, examples are as rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, grooming and stalking.

Psychological abuse: Psychological (or emotional abuse) is harmful behaviour that can cause mental distress. It can include both verbal and non-verbal abuse which can scare, humiliate and isolate a person.

This may include threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Financial or material abuse: Financial abuse is another name for trying to steal, stealing or defraud someone of their money, goods and/or property. This may include theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Modern slavery: encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory abuse: Discriminatory abuse is when someone picks on someone or treats them unfairly because something about them is different. This can include forms of harassment, slurs or similar treatment, because of race, gender and gender identity, age, disability, sexual orientation or religion.

Organisational abuse: Organisational (or institutional abuse) is the mistreatment or neglect of an adult at risk by a regime or individuals. It takes place within settings and services that adults at risk live in or use, including any organisation, within or outside of the Health and Social Care sector.

This can include neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and acts of omission: Neglect occurs when a person deliberately withholds, or fails to provide, appropriate and adequate care and support needed by another adult. It may be through a lack of knowledge or awareness, or through a decision not to act when they know the adult in their care needs help. It may impair the health or well-being of an adult.

This can include including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-neglect: Self-neglect is any failure of an adult to take care of himself or herself that causes or is reasonably likely to cause within a short period of time, serious physical, mental or emotional harm or substantial damage to or loss of assets.

This can cover a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Other definitions in relation to Safeguarding.

Child Sexual Exploitation (CSE) & Missing Persons

Child sexual exploitation is a form of child abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, and / or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Sexual exploitation often involves a grooming stage. Grooming describes the variety of methods that are used to manipulate and control victims, including:

- the giving of gifts or presents.
- the giving of rewards, such as like mobile phone top-ups or games
- credits

- false promises of love and / or affection
- the supply of alcohol and / or drugs

It is common for the grooming of children and young people to take place online. Children and young people can make themselves vulnerable through their online activities, which abusers are quick to exploit. Victims may have been persuaded or coerced into posting indecent images or performing sexual acts on a webcam. Online grooming can also progress to meeting face-to-face.

As a result of the grooming process, children and young people will rarely recognise the coercive and abusive nature of the relationship in which they are involved, and they will often prioritise their attachment or loyalty to the offender over their own safety.

The perpetrators of sexual exploitation are skilled at driving a wedge between a child and their family and they will also isolate them from their usual friends and support networks. Sexually exploited children also suffer physical, psychological, behavioural and attitudinal changes, all of which present severe challenges to their parents and carers.

It is important to remember that:

- Boys and girls are equally vulnerable to becoming victims of child sexual exploitation.
- Coercers and perpetrators are usually adults, of either gender, in a position of power, but can be other children and young people.
- Young people may exchange or sell sex as a result of constrained circumstances, such as poverty, isolation and historic abuse.
- Parents / carers may be involved in the sexual exploitation of their children or fail to prevent / protect their children from abuse.
- Groups of children and young people and multiple perpetrators may be involved.
- No child under 13 years of age nor a child with a learning disability will be assessed as low risk if their behaviours indicate involvement in CSE.
- Children and young people with additional needs, up to and including those aged 24 years, will require special consideration.
- Disclosure of information may take time and evident risks may only emerge during an on-going assessment, support, and intervention with the young person and / or their family.

If you suspect a child is a victim of CSE, reporting should be via the main safeguarding reporting mechanism.

County Lines

County Lines is the name given to drug dealing where organised criminal groups use phone lines to move and supply drugs, usually from cities into smaller towns and rural areas.

The criminal groups exploit vulnerable people, including children and those with

mental health or addiction issues, by recruiting them to distribute the drugs, often referred to as” drug running”.

There are several signs to look out for that may indicate that someone is involved in County Lines activity:

- Repeatedly going missing from school or home and being found in other areas.
- Having money, new clothes or electronic devices and they cannot explain how they paid for them.
- Getting high numbers of texts or phone calls, being secretive about to whom they are speaking.
- Decline in school or work performance.
- Significant changes in emotional or physical wellbeing

Organised criminal groups often use high levels of violence and intimidation to protect the County Line and control those involved. One of these forms of control exploits vulnerable people by using their home as a base for dealing drugs, a process known as “cuckooing”. Dealers often convince the vulnerable person to let their home be used for drug dealing by giving them free drugs or offering to pay for food or utilities.

Often the criminal groups target people who are lonely, isolated, or have addiction issues. It is common for them to use a property for a short amount of time, moving address frequently to reduce the chance of being caught.

There are several signs to look out for that may indicate that someone is a victim of cuckooing:

- Frequent visitors at unsociable hours
- Changes in household daily routines
- Unusual smells coming from a property.
- Suspicious or unfamiliar vehicles outside an address

If you have any suspicions or information that could help in identifying any form of County Lines activity they should be reported to the Police on 101.

Harmful Practices

Harmful practices include Female Genital Mutilation (FGM), Honour Based Violence (HBV) and Forced Marriage.

Female Genital Mutilation:

FGM involves the partial or total removal of the external female genitalia or other damage to the genital organs for supposed cultural, religious or non-medical reasons. FGM, also known as female circumcision (cutting or sunna), can affect females from birth to pregnancy. It inflicts severe physical and psychological damage, which can last a lifetime. While there is intelligence to suggest that FGM is being physically performed in the UK, most victims are usually taken abroad, commonly on flights in the holiday periods of Easter, summer and Christmas. If it

suspected that a child has been a victim of FGM, or there are concerns that a child is at risk of FGM, contact Warwickshire Police on 101. In an emergency call 999.

Honour Based Violence:

HBV is a crime or incident that has or may have been committed to protect or defend the honour of the family and / or community. If this is suspected, no contact should be made with the family. HBV has the potential to be both a domestic abuse and child abuse concern. There are specific behaviours, attitudes and actions that may constitute dishonour and they are wide ranging. Individuals, families and communities may take drastic steps to preserve, protect or avenge their honour, which can lead to substantial human rights abuses. If it is suspected that a child or adult has been a victim of HBV, it should be reported. to Warwickshire Police on 101. In an emergency call 999.

Forced Marriage:

Unlike an arranged marriage, where the prospective spouses may choose whether or not they wish to accept the partnership, a forced marriage is an arrangement in which one or both spouses do not consent to the marriage, or when consent is extracted through duress. From June 2014, forcing someone to marry against their will is crime and anyone found guilty can face up to seven years in prison. If it is suspected that a child or adult has been a victim of forced marriage, it should be reported to Warwickshire Police on 101. In an emergency call 999.

Modern Slavery and Human Trafficking

Modern slavery or human trafficking is the movement of a person(s) from one place to another (this could be country to country, town to town, or even as simple as one room in a building to another) into conditions of exploitation, using deception, coercion, abuse of power or the abuse of the person's vulnerability. It can include slavery, servitude and forced or compulsory labour. Even if a victim consents and is willing to be moved, trafficking could still be taking place. It involves either the threat of harm or actual harm to the person themselves or their family.

National Referral Mechanism (NRM)

There is a national framework, known as the National Referral Mechanism, to assist in the formal identification of modern slavery victims and to help co-ordinate their referral to appropriate services. Certain public bodies, such as local authorities, have a statutory duty to refer potential victims to the NRM.

In England and Wales, a "First Responder" organisation is a body that is authorised to refer a potential victim of modern slavery into the National Referral Mechanism. As a Local Authority, the Borough Council is a First Responder organisation. First Responder organisations have the following responsibilities:

- To identify potential victims of modern slavery and recognise the indicators of modern slavery.

- To gather information in order to understand what has happened to potential victims.
- To refer victims into the NRM (in England and Wales, this includes notifying the Home Office if an adult victim does not consent to being referred)
- To provide a point of contact for the Single Competent Authority (SCA) to assist with decisions and to request a reconsideration, where a First Responder believes it is appropriate to do so.

If it is suspected that a child or adult is a victim of Modern Slavery, it should be reported to Warwickshire Police on 101. In an emergency call 999.

Domestic Abuse

The Domestic Abuse Act 2021 states that the behaviour of a person towards another person is domestic abuse if they are personally connected to each other and the behaviour is abusive. Behaviour is defined as abusive if it consists of physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse or psychological, emotional or other abuse.

Local authorities and the Police have duties to protect and support individuals who experience domestic abuse. They provide these duties both as individual organisations and collaboratively. They include ensuring that safe accommodation is available for households.

Controlling behaviour is defined as:

“A range of acts designed to make a person subordinate and / or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour”.

Coercive behaviour is defined as:

“An act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim”.

Threatening behaviour includes threats of violence, threats of suicide or threats to take the children from the abused person.

Domestic abuse affects people of all ages, social backgrounds, gender, religion, sexual preference or ethnicity, and in a range of relationships: married, separated, divorced, living together, dating, heterosexual, gay or lesbian, and includes child on parent abuse and elder abuse. Domestic abuse that causes serious physical injury is mainly committed by men against women. Male victims of domestic abuse may find it harder to seek help. Domestic abuse affects children who witness the abuse and may require safeguarding action to be taken.

If you have any concern that a person may be at risk from domestic abuse, either directly or indirectly (in the case of children and young people), the Police should be contacted immediately.

Prevent

In Warwickshire, authorities and communities are working together to deliver the Government's Prevent Strategy. Prevent is one of four objectives that make up the Government's Strategy for Countering Terrorism – CONTEST.

The Prevent Strategy has three key objectives:

- 1) Respond to the ideological challenge of terrorism and the threat faced from those who promote it.
- 2) Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- 3) Work with sectors and institutions where there are risks of radicalisation that need to be addressed.

The Strategy challenges all forms of terrorism, including the influence of far right and far left extremists. It defines extremism as “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs”.

Prevent operates in a pre-criminal space, providing support and re-direction to vulnerable individuals at risk of being groomed into terrorist activities before any crimes are committed. Radicalisation could be comparable to other forms of harm and abuse. It is, therefore, considered to be a safeguarding issue and is considered alongside the wider safeguarding agenda.

Anyone with concerns in relation to Prevent should be reported in line with

Equality

All people, regardless of their protected characteristics, should be given the same level of support and protection. Regard should always be given to a person's religion or belief however this should not override acts of abuse or a breach of law e.g. underage marriage, Female Genital Mutilation (FGM).

It should be noted that people with disabilities, migrant adults and children, unaccompanied asylum-seeking children (UASC), victims of trafficking, domestic abuse and bullying may have additional care needs, and this should be remembered when considering the behavioural indicators.

Additional guidance is available on the Safeguarding Warwickshire website.

NBBC Reporting Procedure

Any safeguarding suspicions should be reported as soon as possible. Any delay should result in further abuse & making a situation worse.

Upon identifying a safeguarding concern, a referral should be made to the Designated Safeguarding Lead within 1 working day.

The referral form is on DASH under NBBC processes.

Once this referral is received, the Designated Safeguarding Lead (in discussion with the referrer) will decide whether there is sufficient evidence to make a referral.

Once the decision has been made to make a referral, the Designated Safeguarding Lead will then make the referral to the appropriate agency.

In the absence of the Designated Safeguarding Lead, if there is a high level of concern, a referral should be made without delay. The Designated Safeguarding Lead should be notified of any referral made.

Any child referral made to the Warwickshire Triage Hub/Front Door should be made using the MAC form attached as Appendix 1.

Any allegations of historical abuse should be responded to in the same way as current concerns.

Contact Information

Warwickshire Triage Hub/Front Door:

01926 414144 (Monday to Thursday 8.30am to 5.30pm, Friday 8.30am to 5.00pm)

01926 886922 (out of hours)

Triage Hub email: triagehub@warwickshire.gov.uk

Adult Social Care: 01926 410410

Adult Referral emails: adultreferrals@warwickshire.gov.uk

Coventry and Warwickshire Mental Health Services: 08081 966798

MH Referrals (RYG) C&W PARTNERSHIP TRUST email
mhreferrals@covwarkpt.nhs.uk

The email addresses above should only be used by professionals and not disclosed to the public.

Consent for referrals

Children

While it ideal for consent to be obtained to make a referral in respect of a child, it is not mandatory to do so.

Both the Children Acts (1989 & 2004) and the General Data Protection Regulations enable professionals to make referrals when they have concerns about the welfare of a child.

Adults

Officers should always try and obtain consent from an Adult to make a referral on their behalf (e.g., to Adult Social Care, Mental Health).

While it would be preferable to have this consent in writing, verbal consent is acceptable also.

If an adult doesn't consent to the Council making a referral this should be respected. However, there are certain circumstances where this will not apply, and a referral can be made:

- other people are, or may be, at risk, including children.
- sharing the information could prevent a crime.
- the alleged abuser has care and support needs and may also be at risk.
- a serious crime has been committed.
- employees are implicated.
- the person has the mental capacity to make that decision, but they may be under duress or being coerced.
- the risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral.
- a court order or other legal authority has requested the information.
- the person lacks the mental capacity to make the decision – *this must be properly explored and recorded in line with the Mental Capacity Act*

Guidance for Employees, Members and Volunteers

The following guidelines will help safeguard children, young people and adults; our Employees, Members, volunteers and contractors; the Borough Council and other concerned organisations (This group will be referred to as Council Employees throughout the rest of the document). The guidelines aim to promote positive practice and are some examples of care which should be used by everyone while working with children, young people and adults at risk.

Professional Curiosity

Professional curiosity is the capacity and skill for proactive questioning and challenge (rather than making assumptions or professional optimism not based on an assessment of history and current circumstances).

Council Employees should never be frightened to ask the obvious question and share concerns with colleagues or their supervisor/line manager. A fresh take on the situation can sometimes really help practitioners and organisations maintain good practice standards and develop a critical mindset.

The Council encourages Employees to challenge any situation which they are not happy with the response or outcome.

Safeguarding Warwickshire has an Escalation Procedure to follow should Employees wish to challenge decisions made by Children Services or Adult Social Care.

Safe Working Practices for Council Employees

Should the situation arise where an employee comes into contact with a child or an adult who may have care and support needs, the following should be adhered to:

- When working with children and adults, avoid situations where you and an individual are alone and unobserved.
- Do not take children or adults alone on a car journey, however short.
- Children or young people should never be left unattended. For example, it is the parent / carer's responsibility to supervise any children in their care when they are visiting the Council offices, or when any Council Employee is carrying out a home visit.
- Children and adults have the right to privacy, respect, and dignity. Respect the individual and provide a safe and positive environment.

Staff, Members, and volunteers should never:

- Engage in rough physical games, including horseplay.
- Engage in sexually provocative games.
- Allow or engage in inappropriate touching of any form.
- Allow children or adults to use inappropriate language unchallenged or use it yourself.
- Make sexually suggestive comments about or to a child or adult with needs for care and support, even in fun.
- Let any allegation a child or adult makes be ignored or go unrecorded.
- Do things of a personal nature for children or adults that they can do for themselves, e.g., assist with changing, handle money.

- Take a child or adult to the toilet, unless this is an emergency and a second, same-sex member of staff is present.
- Use a mobile phone, camera or other recording device in any changing or other single sex location, such as toilets, when the area is occupied.

How to Respond to Disclosures

Listening to a disclosure can be difficult, and although it is not expected that employees will actively seek or probe people for disclosures, if someone does disclose information about abuse you should:

- Listen carefully.
- Take the person seriously.
- Write down, as soon as you can, what has been said (using their words) and any extra information about their actions whilst giving the information (for example, if someone said “they hurt my arm” but pointed to their leg you would need to record both elements)
- Follow the safeguarding procedures outlined within this Policy.
- Tell the person what you are going to do next.
- Do not promise to keep anything a secret. Remember, it is a statutory duty to report safeguarding concerns.
- Do not ask leading questions. If you do not feel comfortable, confident or the situation is having a negative impact on your emotional wellbeing, seek support from your Line Manager or the Designated Safeguarding Lead.

In some circumstances, a passive disclosure may be received i.e., a conversation may disclose information of abuse. The same process above should be followed should this be the case and the person disclosing should be informed that the conversation is being treated as a safeguarding concern.

Looking After Yourself

Receiving a disclosure can have a significant impact on your emotional wellbeing. If you are affected by anything you have read or heard about safeguarding, you can:

- Discuss the matter with your Line Manager
- Access counselling through the Authority (via Human Resources).
- Talk through the issue with your Line Manager or the Designated Safeguarding Lead
- Access medical support outside of NBBC e.g., GP.

Suicide Threats

Any threats of suicide made to the Council should be treated extremely seriously.

Further guidance on suicide threats can be sought from the Councils specific guidance on dealing with suicide threats.

Escalation Procedure

If an employee has an issue about how a safeguarding concern has been dealt following a Front Door or Adult Social Care referral, they should raise this with the Council’s Designated Safeguarding Lead who will then follow the Warwickshire Safeguarding Partnership Escalation Process.

Safer Recruitment & Employment

Recruitment and Selection

All the Borough Council's staff will be appointed in line with the Authority's Recruitment and Selection Policy and other associated procedures to ensure that all of the necessary checks are carried out on individuals expected to work with children and adults who may have care and support needs.

Pre-selection checks will include the following:

- Completion of an application form, including a self-disclosure about criminal records
- Where appropriate, consent to obtain information from the Disclosure and Barring Service in order to assess an applicant's suitability to work within the role they have applied for working with children and adults at risk in accordance with legislation.
- Receipt of two relevant references
- Proof of qualifications
- Confirmation of identity

Disclosure and Barring Service (DBS)

In line with the Borough Council's Recruitment and Selection Policy and DBS Policy and Guidelines, DBS checks will be carried out on all employees involved in 'Regulated Activity' relating to children and adults at risk. The Council has a separate Policy covering DBS checks. These Policies, in addition to the list of posts which require a DBS check, is administered by Human Resources.

Supervision and Annual Development Review

All employees working, or having regular contact, with children and adults with possible care and support needs, should have the opportunity to discuss any safeguarding concerns they have (whether as part of their role or outside of work) as part of their one-to-one meetings.

Safeguarding issues, either achievements or challenges, should also be raised/discussed during an Employees Annual Development Review.

Induction and Training

All employees who start employment with the Council will be required to undertake an induction programme which includes mandatory safeguarding elements.

In addition to this, all Employees who may come into contact with children or adults with care and support needs will be required to undertake the Councils Safeguarding Training every three years. This training will cover the principles of this Policy including the definitions of abuse, how to better identify signs of abuse in addition to reporting mechanisms.

Further specific training identified will be provided as appropriate.

External Clubs / Organisations Using Borough Council Facilities

All clubs and organisations working with children, young people and adults with care & support needs that use Borough Council facilities will be expected to have appropriate arrangements in place to safeguard their users/members. These arrangements may include, for example and where relevant, formal compliance with the safeguarding requirements of the governing body for the sport or activity concerned.

If a club or organisation does not have its own policy, (or evidence of formal compliance with the safeguarding requirements of an appropriate governing body), a copy of this Policy will be distributed with the Terms and Conditions of Hire. The club/organisation will then be required to commit to adhere to the provisions of this Policy.

Use of Contractors

The Council and its Employees, Elected Members and volunteers will exercise reasonable care to ensure that contractors undertaking work on behalf of the Authority are appropriately supervised and monitored.

As part of the procurement process, any contractor or sub-contractor engaged by the Borough Council in areas where workers are likely to come into contact with children or adults at risk, should have their own equivalent Safeguarding Policy. Failing this, it must demonstrate that they will comply with the terms of this Policy.

If a contractor's work brings them within the definition of 'regulated activity', it will be a requirement that anyone working within this definition will be required to have an enhanced DBS check.

Allegations Against a Member of Staff

Allegations Against People Who Work with Children / Young People

Referrals to the Local Authority Designated Office (LADO) should be made where there are concerns that someone who works with children may have:

- Behaved in a way that has harmed, or may have harmed, a child.
- Possibly committed a criminal offence against, or related to, a child.
- Behaved towards a child or children in a way that indicates that they may pose a risk of harm to children.

These behaviours should be considered within the context of the four categories of child abuse (physical, sexual, emotional and neglect). These include concerns relating to inappropriate relationships between members of staff and children or young people, for example:

- Having a sexual relationship with a child under 18 years of age if in a position of trust in respect of that child, even if it is consensual.
- 'Grooming', i.e., meeting a child under 16 years of age with intent to commit a relevant offence.
- Other grooming behaviour giving rise to concerns of a broader child protection nature (e.g., inappropriate text / email messages or images, gifts, socialising, etc.)
- Possession of indecent photographs / pseudo-photographs of children

If concerns arise about a person's behaviour towards their own children, the standard referral process should be followed.

Referrals of this nature will be made on the Position of Trust Multi-Agency Contact Form (POT MAC) and emailed to the LADO at their direct email address, which is lado@warwickshire.gov.uk. It is the responsibility of the Equality and Safeguarding to inform the Local Authority Designated Office (LADO) within one working day.

Any allegations of historical abuse should be responded to in the same way as current concerns.

If, following an investigation, the allegations are founded and the employee dismissed, the information will be shared with the Disclosure and Barring Service. Further advice on this can be found in the Disciplinary Policy and Dismissal procedures.

Allegations Against People Who Work with Adults at Risk

All concerns should be reported to the Strategic Director of the service in which the Officer is employed. The Strategic Director will then liaise with Human Resources.

A referral will then be made to Adult Social Care and/or the Police depending on the circumstances.

Relevant Human Resources Policy will be followed while an investigation is being carried out. Any Council investigation may be dependent on any investigation being carried out by an external body i.e. Police.

General Data Protection Regulations (GDPR)

The General Data Protection Regulations (GDPR) supersedes the Data Protection Act 1998. Practitioners must have due regard to the relevant data protection principles that allow them to share personal information.

The GDPR and Data Protection Act 2018 place greater significance on the need for organisations to be transparent and accountable in relation to their use of data. All organisations handling personal data must ensure that they have in place comprehensive and proportionate arrangements for collecting, storing, and sharing information. This also includes arrangements on informing service users about the information that they will collect and how this may be shared.

The GDPR and Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

To effectively share information:

- All employees should be confident of the processing conditions that allow them to store and share the information that they need to carry out their safeguarding role. Information that is relevant to safeguarding will often be data which is considered to be “special category personal data”, meaning that it is sensitive and personal.
- Where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as one of conditions that allows practitioners to share information with others without consent.
- Information can be shared legally without consent, if a practitioner is unable to, or cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.
- Relevant personal information can also be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental or emotional wellbeing.

The Borough Council will use personal data for a limited number of purposes and always within the rules set out in the GDPR and Data Protection Act 2018. The Authority will process data to protect individuals from potential harm or injury.

Photography/image recording/CCTV

Many people now carry sophisticated mechanisms of capturing high quality pictures and videos, mainly via a smartphone. This, together with the popularity of tablet/portable computers, creates opportunities to record and share images in a variety of places and situations, and as a consequence presents opportunities for potential misuse.

The Council's priority at all times will be to safeguard the welfare of children and the Council will aim to minimise opportunities for the inappropriate capture of images and/or video.

Photography is therefore banned on Council premises in the following areas:

- All changing areas
- Toilets
- First aid rooms
- Shower/Washing areas

Any person who is found to be capturing pictures and/or videos in these areas should be asked to stop immediately.

As a rule, Council employees should actively discourage photography and video recording on Council premises. Council employees should be mindful of photography/image recording and challenge people when they feel the photography/image recording is inappropriate and report this to their Line Manager immediately.

At any Authority-led event in a public area, it would be deemed unreasonable to request consent from everyone present. These images can only be used in promotional material relating to the event and must not be passed to third parties.

The Borough Council is not responsible for collating consent for external organisations or individuals (e.g., journalists) who are not employed by the Authority when they are taking photographs at Council run events.

For each occasion photos are being taken of children, Council employees should set out explicitly on each occasion to parents/guardians how the photos are going to be used. Consent should be obtained for each media platform e.g., Facebook, twitter, newspaper etc. Photos should not be kept longer than required and should be destroyed as soon as they are not required.

Images taken by Council employees should be stored on a secure Council system and under no circumstances should images of children or adults at risk be stored on an employee's personal or work mobile / other handheld device.

Appendix A: MAC form

Multi-agency Contact - MAC

This form should always be completed (to the best of your knowledge) when making a contact to the Warwickshire Children and Families Front Door. Please contact the Front Door first to discuss this matter.

If you have previously rung, please provide the reference number.

It is important to note that this MAC will be assessed to see if it meets the threshold for becoming a referral for further action.

For an immediate concern about a child in danger dial 999.

In Warwickshire we are working restoratively with families, so it is important to tell us what is working well in the family, the strengths and the barriers to change.

[In line with the Pathway to Change Model which can be accessed here.](#)

1. About the Child

First Name		Last Name	
Address		Postcode	
Telephone		Gender	
Date of Birth/ Expected Delivery Date		What does the child say / how does the child see themselves?	
Ethnicity		Religion	
Disability		National health number	
Interpreter required? If yes, which language			

2. Details of parent/carer's/key family members including siblings

First Name	Last Name	DOB/EDD/Age	Ethnicity	Address	Tel	Email address	Relationship to Child

Interpreter required? If yes, which language?	
---	--

3. About You

Your Name			
Name of organization		Job Title	
Email address		Telephone number	
Relationship to child / your agency's role or service provided		Contact address	

4. Informing the parent(s) and carer(s).

As a professional working with the child or family, it is your responsibility to speak to the parents or carers about your concerns; unless by doing so will place the child at risk of significant harm or cause undue delay.

Have you informed parents or carer's about making this contact to the Front Door?	
---	--

Parent/carers signature	
-------------------------	--

If not informed can you say why?

5. Reason for contact

What is happening now?	
------------------------	--

Who is affected and how?	
--------------------------	--

Do you know what has happened in the past?	
--	--

What has triggered this matter now?													
<p>Are there clear child protection concerns? If so, please state what they are? Tick all which apply.</p> <p>Physical harm <input type="checkbox"/></p> <p>Emotional harm <input type="checkbox"/></p> <p>Neglect <input type="checkbox"/></p> <p>Sexual abuse <input type="checkbox"/></p> <p>Exploitation <input type="checkbox"/></p>													
What keeps the issue going?													
What is working well in this family?													
What changes need to happen?													
How will we know change has been achieved?													
If nothing changes in your view how serious is this matter?	<table style="width: 100%; border: none;"> <tr> <td style="width: 16.6%;">1</td> <td style="width: 16.6%;">2</td> <td style="width: 16.6%;">3</td> <td style="width: 16.6%;">4</td> <td style="width: 16.6%;">5</td> <td style="width: 16.6%;">6</td> </tr> <tr> <td>7</td> <td>8</td> <td>9</td> <td>10</td> <td></td> <td></td> </tr> </table> <p>No harm High harm</p>	1	2	3	4	5	6	7	8	9	10		
1	2	3	4	5	6								
7	8	9	10										

6. Details of professionals involved with child or family (GP, school, health, voluntary organisation etc.)

Name	Organisation	Relationship to Child	Email Address and telephone number
Has an Early Help pathway plan been considered?			Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please attach the plan to this contact.

https://www.warwickshire.gov.uk/children-families/early-help-warwickshire/1	
---	--

7. Contact has been sent to the Children and Families Front Door at TriageHub@Warwickshire.gov.uk

Date of contact:	
Date Front Door responded to the person submitting the Contact:	

Cabinet/Individual Cabinet Member Decision

Report Summary Sheet

Date: 6th November 2024

Subject:

Air Quality Management – Revocation of Leicester Road Gyratory Air Quality Management Area

Portfolio: Planning and Enforcement

From: Assistant Director – Environment and Enforcement

Summary: Cabinet is asked to consider approval of revocation of Leicester Road Gyratory Air Quality Management Area (AQMA 1). The AQMA was declared on 1st March 2007 for exceedances of the nitrogen dioxide national air quality objective. However nitrogen dioxide concentrations in AQMA 1 have been below 90% of the annual mean objective value for more than 10 years. Concentrations in 2023 (as well as from 2020 to 2022) were all below 75% of the annual mean objective. As part of the Annual Status Reporting process, Defra have confirmed that AQMA 1 should be revoked.

Recommendations:

It is recommended that Cabinet approve the revocation of AQMA 1

Options:

- Cabinet can approve revocation of the Air Quality Management Area, or
- Cabinet could not approve the revocation of the Air Quality Management Area

Reasons:

Demonstrable compliance with air quality objectives over a prolonged period. Defra have requested revocation in accordance with updated guidance to retain the integrity of the Local Air Quality Management regime.

Consultation undertaken with Members/Officers/Stakeholders

Defra - as part of the Annual Status Reporting process.
Members - via the Housing, Environment and Health Overview and Scrutiny Panel.
Air Quality Steering Group.

Subject to call-in: Yes

Ward relevance: St Nicolas

Forward plan: Yes

Building a Better Borough Aim: 1

Building a Better Borough Priority: 1

Relevant statutes or policy:

Part IV of the Environment Act 1995
Local Air Quality Management Policy Guidance PG22
Local Air Quality Management Technical Guidance TG22

Equalities Implications:

(Does this require an Equalities Impact Assessment? If so please append.)

None – confirmed no impact assessment required.

Human resources implications:

None

Financial implications:

None

Health Inequalities Implications:

Air Quality is an area of national concern affecting the health and wellbeing of the UK population. However the demonstrable compliance with national air quality objective mean the AQMA can be revoked.

Section 17 Crime & Disorder Implications:

None

Risk management implications:

None

Environmental implications:

Improving air quality means the AQMA can be revoked. Nitrogen dioxide monitoring will continue unchanged within the current AQMA area to identify trends in future and particularly to identify any deterioration in air quality.

Legal implications:

If revocation is approved the AQMA will be legally revoked in accordance with the Environment Act 1995.

Contact details:

Andrew Snowden

Senior Environmental Health Officer

andrew.snowden@nuneatonandbedworth.gov.uk

02476376337

AGENDA ITEM NO. 7

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Cabinet

From: Assistant Director – Environment and Enforcement

**Subject: Air Quality Management – Revocation of Leicester Road Gyratory
Air Quality Management Area**

Portfolio: Planning and Enforcement (Councillor Rob Roze)

Building a Better Borough Aim: 1

Building a Better Borough Priority: 1

1. Purpose of the Report

1.1. Cabinet is asked to consider approving the revocation of Leicester Road Gyratory Air Quality Management Area (AQMA 1), following the requirement from Defra and subsequent recommendation from the Councils Housing, Environment and Health Overview and Scrutiny Panel.

2. Recommendations

2.1. It is recommended that Cabinet approve the revocation of AQMA 1.

3. Background

3.1. Part IV of the Environment Act 1995 requires Local Authorities, through the Local Air Quality Management (LAQM) system, to assess air quality in their area and designate Air Quality Management Areas (AQMAs) if improvements are necessary.

3.2. NBBC carries out monitoring of nitrogen dioxide concentrations using a network of diffusion tubes. The Council has declared two Air Quality Management Areas (AQMAs), both within Nuneaton, for exceedances of the annual mean nitrogen dioxide (NO₂) objective. These AQMAs are Leicester Road gyratory (AQMA 1) and Midland Road/Central Avenue/Corporation Street (AQMA 2). Where an AQMA is designated, local authorities are required to produce an Air Quality Action Plan describing the pollution reduction measures it will put in place.

3.3. AQMA 1 was declared on 1st March 2007. The NO₂ level at declaration was 43 µg/m³ set against a national objective of 40 µg/m³. The boundary of the AQMA is shown in figure 1 below. Nuneaton and Bedworth Borough Council produced an action plan as required by the Environment Act 1995 in April 2022 which replaced the previous action plan produced in 2011. The action plan sets

out measures the Council will take to achieve compliance with national air quality objectives.

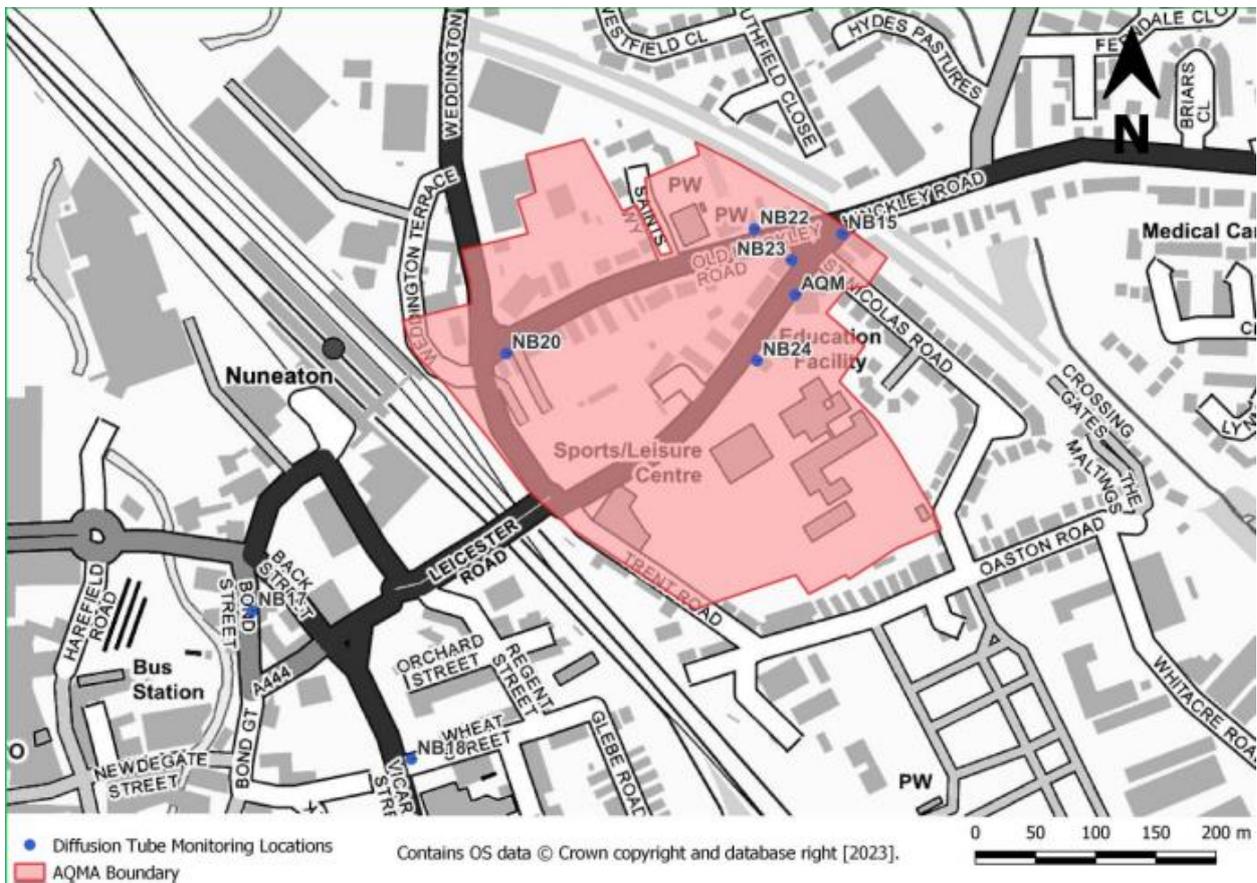


Figure 1. Leicester Road Gyratory Air Quality Management Area (AQMA 1)

4. Body of Report – AQMA Revocation

4.1. In accordance with Local Air Quality Management (LAQM) requirements the Council must produce an Annual Status Report (ASR). This details pollutant levels and progress against the action plan over the previous year.

4.2. NO₂ concentrations measured in AQMA 1 have been below 90% of the annual mean NO₂ objective value of 40 µg/m³ (i.e. below 36 µg/m³) for more than 10 years. Concentrations in 2023 (as well as from 2020 to 2022) were all below 75% of the annual mean objective. The highest NO₂ concentration in AQMA 1 in 2023 was 23.8 µg/m³. AQMA 1 NO₂ levels between 2019 and 2023 at all monitoring positions are shown in figure 2 below.

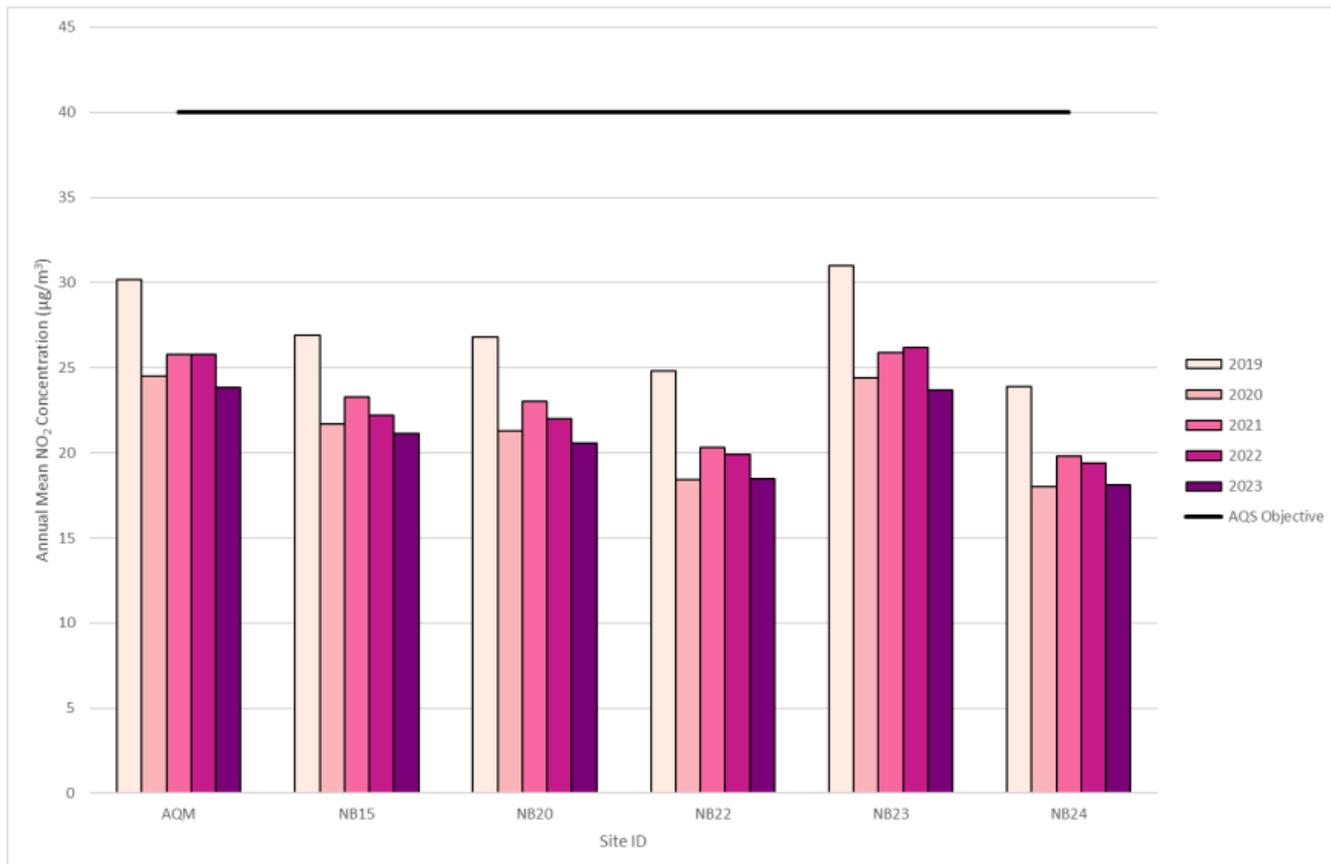


Figure 2: AQMA 1 NO₂ Levels 2019 – 23 at all monitoring positions

4.4. Following ASR appraisal Defra first recommended revocation of AQMA 1 in 2018. This was subsequently not taken forward as a result of concern around increased traffic arising from extensive housing developments to the north of Nuneaton. However changes to technical and policy guidance in 2022 strengthened the revocation requirement. Upon appraisal of the 2023 ASR (Appendix B) Defra commented;

“following a strengthened approach in 2023, it is now recommended that the revocation of this AQMA progresses in the upcoming reporting year unless there is sufficient evidence that the proposed development(s) will cause significant impacts on air quality.

The revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objective as evidenced through monitoring. Where there have been no exceedances for the past five years, local authorities must proceed with plans to revoke the AQMA. The LAQM Technical Guidance 2022 is clear in this respect:

“There should not be any declared AQMAs for which compliance with the relevant objective has been achieved for a consecutive five-year period.” (Point 3.57, page 50).”

Please be aware that unless a likely exceedance has been identified in the area, Defra will not appraise AQAPs for AQMAs that have been in compliance for five years. Local Authorities will instead be advised to revoke the AQMA.

AQMAs should identify areas where air quality objectives are not being met or are likely to be at risk of not meeting them. Keeping AQMAs in place longer than required risks diluting their meaning and impacting public trust in LAQM”

This requirement was reiterated in the Defra appraisal of the 2024 ASR (Appendix C);

The Council should continue with the revocation process of AQMA 1 and report progress in the 2025 ASR. Monitoring should continue at site AQM to highlight the possible impacts of housing development(s) surrounding the AQMA. Where possible, details of the housing development(s) and any submitted air quality assessments could be included in future ASRs to support the decision to revoke the AQMA.

4.4. The revocation proposal was considered by Housing, Environment and Health Overview and Scrutiny Panel on 1st February 2024. The panel supported the revocation proposal (Minute HEH38).

5. Conclusion

5.1. Evidence of Nitrogen Dioxide levels obtained over a number of years and national policy requirements clearly set out the basis and justification for revocation the AQMA. It should be noted that the revocation would not, in anyway, reduce the level of ongoing monitoring in the area currently covered by AQMA 1. Monitoring would continue and as such would identify any deterioration in air quality standards.

6. Appendices

- Appendix A – 2024 Annual Status Report
- Appendix B – Defra appraisal report - ASR 2023
- Appendix C – Defra Appraisal Report - ASR 2024

7. Background Papers

- Defra - Local Air Quality Management. Technical Guidance (TG22) Available at: [LAQM-TG22-August-22-v1.0.pdf](#)
- Defra - Local Air Quality Management. Policy Guidance (PG22) Available at: [LAQM-Policy-Guidance-2022.pdf](#)



Nuneaton and Bedworth Borough Council

Annual Status Report 2024

Bureau Veritas

June 2024



Move Forward with Confidence

Document Control Sheet

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2024 Air Quality Annual Status Report (ASR)

In fulfilment of Part IV of the Environment Act 1995
Local Air Quality Management, as amended by the
Environment Act 2021

Date: June, 2024

Information	Nuneaton and Bedworth Details
Local Authority Officer	Sara Warne
Department	Environmental Protection Team, Regeneration and Public Protection
Address	Town Hall Coton Road Nuneaton CV11 5AA
Telephone	02476 376 405
E-mail	envhealth@nuneatonandbedworth.gov.uk
Report Reference Number	AIR22017201
Date	June 2024

Executive Summary: Air Quality in Our Area

Air Quality in Nuneaton and Bedworth

Breathing in polluted air affects our health and costs the NHS and our society billions of pounds each year. Air pollution is recognised as a contributing factor in the onset of heart disease and cancer and can cause a range of health impacts, including effects on lung function, exacerbation of asthma, increases in hospital admissions and mortality. In the UK, it is estimated that the reduction in healthy life expectancy caused by air pollution is equivalent to 29,000 to 43,000 deaths a year¹.

Air pollution particularly affects the most vulnerable in society, children, the elderly, and those with existing heart and lung conditions. Additionally, people living in less affluent areas are most exposed to dangerous levels of air pollution².

Table ES 1 provides a brief explanation of the key pollutants relevant to Local Air Quality Management and the kind of activities they might arise from.

Table ES 1 - Description of Key Pollutants

Pollutant	Description
Nitrogen Dioxide (NO ₂)	Nitrogen dioxide is a gas which is generally emitted from high-temperature combustion processes such as road transport or energy generation.
Sulphur Dioxide (SO ₂)	Sulphur dioxide (SO ₂) is a corrosive gas which is predominantly produced from the combustion of coal or crude oil.
Particulate Matter (PM ₁₀ and PM _{2.5})	<p>Particulate matter is everything in the air that is not a gas.</p> <p>Particles can come from natural sources such as pollen, as well as human made sources such as smoke from fires, emissions from industry and dust from tyres and brakes.</p> <p>PM₁₀ refers to particles under 10 micrometres. Fine particulate matter or PM_{2.5} are particles under 2.5 micrometres.</p>

¹ UK Health Security Agency. Chemical Hazards and Poisons Report, Issue 28, 2022.

² Defra. Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

The main sources of air pollution within Nuneaton and Bedworth are from road traffic, contributing to elevated concentrations of nitrogen dioxide (NO₂) and fine particulate matter (PM₁₀ and PM_{2.5}). Currently, there are two designated Air Quality Management Areas (AQMA) in the borough, both of which have been declared in relation to exceedances of the Air Quality Strategy (AQS) annual mean objective for NO₂ and both are adjacent to busy roads and interchanges within Nuneaton. The boundaries of the two AQMAs can be viewed online at [Local Authority Details - Defra, UK](#), details are provided in Table 2.1 and maps are presented in Figure D.1 to Figure D.5 (Appendix D).

Compared to 2022 levels, air pollutant concentrations decreased across Nuneaton and Bedworth at all monitoring locations in 2023. Air pollutant concentrations in Nuneaton and Bedworth are generally demonstrating a long-term reduction. Consistently low NO₂ concentrations in the Leicester Road Gyratory AQMA (AQMA 1) led to Defra recommending its revocation in 2018; this revocation is currently delayed by the local election process. The plan is to take the report to the September cabinet and for AQMA 1 to be revoked. The Midland Road / Corporation Street AQMA (AQMA 2) has achieved four consecutive years of compliance since 2020. Considering the first year of compliance was achieved in 2020 which was under the impact of COVID-19 lockdown and may not be representation of long term trends, the monitoring results will be reviewed in the 2025 ASR to decide whether to revoke the AQMA.

Actions to Improve Air Quality

Whilst air quality has improved significantly in recent decades, there are some areas where local action is needed to protect people and the environment from the effects of air pollution.

The Environmental Improvement Plan³ sets out actions that will drive continued improvements to air quality and to meet the new national interim and long-term targets for fine particulate matter (PM_{2.5}), the pollutant of most harmful to human health. The Air Quality Strategy⁴ provides more information on local authorities' responsibilities to work towards these new targets and reduce fine particulate matter in their areas.

³ Defra. Environmental Improvement Plan 2023, January 2023

⁴ Defra. Air Quality Strategy – Framework for Local Authority Delivery, August 2023

The Road to Zero⁵ details the Government's approach to reduce exhaust emissions from road transport through a number of mechanisms, in balance with the needs of the local community. This is extremely important given that cars are the most popular mode of personal travel and the majority of Air Quality Management Areas (AQMAs) are designated due to elevated concentrations heavily influenced by transport emissions.

Nuneaton and Bedworth Borough Council has successfully progressed and implemented the following measures:

- Vehicle Policy relating to taxis and private hire vehicles came into effect in October 2023 - all taxis and private hire vehicles have to be Euro 4 or above. This will have a positive impact on air quality as the vehicle fleets will become less polluting;
- Warwickshire Energy Strategy was adopted in 2023;
- Warwickshire's Local Cycling and Walking Infrastructure Plan (LCWIP) was approved by Warwickshire County Council in February 2024;
- Warwickshire County Council approved a new EV (Electric Vehicle) Parking Policy. This policy allows the council to make on-street EV charging bays 'EV-Only';
- Nuneaton and Bedworth Borough Council (NBBC) Health and Wellbeing Officer Steering Group was established in 2023. Amongst other issues the group aims to raise awareness of air quality on the health and wellbeing of employees;
- Since August 2022, the Safe and Active team have completed 72 'Dr. Bike' safety checks and security marked 55 bikes within NBBC, all helping to encourage modal shift; and
- An Award Programme has been introduced in schools to decrease the number of car journeys, increase walking, cycling and scooting and educate on the benefits of active travel on health and the environment. For the academic year 23-24, fourteen primary schools across Nuneaton and Bedworth received 'Safe and Active Travel' awards training. Many of these schools have also promoted active travel throughout the year, with activities such as Bike to School week and Bikeability Cycle Training.

⁵ DfT. The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy, July 2018

Nuneaton and Bedworth Air Quality Supplementary Planning Document⁶ was adopted in 2020, which sets the requirements and guidance for detailed assessments and/or low emission strategies as part of planning applications.

Revised Action Plan for Nuneaton and Bedworth was adopted in 2022. The action plan outlined the actions that have been developed to address the exceedance of the annual mean NO₂ objective along Midland Road in Nuneaton, and also more strategic issues to reduce emissions of both NO₂ and PM_{2.5} across the borough, to improve health in a more equitable way. The measures are presented under five broad topics:

- Support and Collaborate with Warwickshire County Council (WCC) on Traffic Management Measures Directly Impacting Midland Road;
- Promotion of Behaviour Change away from Single Occupancy Private Vehicle Use;
- Promotion of the Use of Alternatively Fuelled Vehicles;
- Developing Policies to Support Better Air Quality; and
- Controlling Domestic Emissions.

The Plan recognises that concentrations of NO₂ are reducing and therefore, to be proportionate, focusses on actions which can be implemented within the next few years, with costs that are proportionate to the level of exceedance.

The Action Plan was written in collaboration with a Steering Group which included WCC, Highways Authority, planning and climate change colleagues and the Consultant in Public Health, Warwickshire. The Transforming Nuneaton team were also consulted with.

Conclusions and Priorities

In 2023, measured concentrations were below relevant air quality objectives, although it is acknowledged that the health impacts of air pollution exposure can occur at concentrations below the objectives. Our priorities are to ensure that the air quality objectives continue to be met along Midland Road in Nuneaton, largely through traffic management measures as well as encouragement of alternatively fuelled vehicles (in particular electric cars and buses).

⁶ Nuneaton and Bedworth Borough Council. Supplementary Planning Document: Air Quality, 2020. Available at: <https://www.nuneatonandbedworth.gov.uk/downloads/download/106/supplementary-planning-documents>

Secondly, the Nuneaton and Bedworth Borough Council Air Quality Action Plan (AQAP) aims to reduce emissions more generally across the borough through collaborative working with other policy areas such as County transport, public health, planning and work underway to tackle the Climate Emergency declared in Nuneaton and Bedworth. We will ensure that air quality is considered within transport schemes, the Borough Plan and within other policy areas which are looking to reduce vehicle use, either by encouraging active travel, by reducing travel demand, encouraging freight onto different modes, or increasing the use of non-diesel and petrol vehicles. By taking this more strategic approach, air quality and the associated health outcomes should improve across the district.

Local Engagement and How to get Involved

The main source of air pollution within Nuneaton and Bedworth originates from road traffic emissions. Therefore, the best way for members of the public to help improve air quality within the borough is to adjust travel patterns to more sustainable methods of transport. There are online tools available to help you plan your journey, including WCC's car share database ([Carshare Warwickshire community - part of the Liftshare network](#)), How You Move website and Facebook page <https://www.facebook.com/ChooseMoveCW/>, local bus timetables ([Public transport – Warwickshire County Council](#)) and cycling information ([Cycling – Warwickshire County Council](#)). The following are suggested alternatives to private travel:

- Use public transport where available – this reduces the number of private vehicles in operation, thereby reducing pollutant concentrations through a reduction in the number of vehicles and reducing congestion;
- Walk or cycle if your journey allows – from choosing to walk or cycle for your journey, the number of vehicles is reduced and also there is the added benefit of keeping fit and healthy. In addition, many of the cycle routes are off-road meaning you are not in close proximity to emissions from road traffic sources;
- Car / lift sharing – where a number of individuals are making similar journeys, such as travelling to work or to school, car sharing reduces the number of vehicles on the road and therefore the amount of emissions being released. This can be promoted via travel plans through the workplace and within schools;
- Alternative fuel / more efficient vehicles – choosing a vehicle that meets the specific needs of the owner. Fully electric, hybrid fuel and more fuel-efficient cars are available and all have different benefits by reducing emissions; and

- Home working – choosing to work from home can help to alleviate congestion on the roads during peak times and therefore reduce the amount of emissions being released.

Local Responsibilities and Commitment

This ASR was prepared by the Environmental Protection Team of Nuneaton and Bedworth Borough Council with the support and agreement of the following officers and departments:

- WCC Transport Planner for Walking, Cycling and Wheeling
- WCC Project and Programme Management Team
- NBBC Licensing Officers
- WCC Strategy and Policy Team, Transport
- WCC Road Safety Education Officer
- WCC Transport Planning (Active Travel) Team
- NBBC Home Energy Efficiency Officers

This ASR has been signed off by a Director of Public Health for Warwickshire County Council – Dr Shade Agboola.

If you have any comments on this ASR please send them to Sara Warne at:

Town Hall, Coton Road, Nuneaton, CV11 5AA

02476 376 405

envhealth@nuneatonandbedworth.gov.uk

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1 Local Air Quality Management

This report provides an overview of air quality in Nuneaton and Bedworth during 2023. It fulfils the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995), as amended by the Environment Act (2021), and the relevant Policy and Technical Guidance documents.

The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the air quality objectives are likely to be achieved. Where an exceedance is considered likely the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in order to achieve and maintain the objectives and the dates by which each measure will be carried out. This Annual Status Report (ASR) is an annual requirement showing the strategies employed by Nuneaton and Bedworth Borough Council to improve air quality and any progress that has been made.

The statutory air quality objectives applicable to LAQM in England are presented in Table E.1.

2 Actions to Improve Air Quality

2.1 Air Quality Management Areas

Air Quality Management Areas (AQMAs) are declared when there is an exceedance or likely exceedance of an air quality objective. After declaration, the authority should prepare an Air Quality Action Plan (AQAP) within 18 months. The AQAP should specify how air quality targets will be achieved and maintained, and provide dates by which measures will be carried out.

A summary of AQMAs declared by Nuneaton and Bedworth Borough Council can be found in Table 2.1. The table presents a description of the two AQMAs that are currently designated within Nuneaton and Bedworth. Appendix D: Map(s) of Monitoring Locations and AQMAs provides maps of AQMAs and also the air quality monitoring locations in relation to the AQMAs. Both AQMAs are designated for exceedances of the annual mean NO₂ air quality objective.

There were no exceedances of the annual mean NO₂ objective recorded at any monitoring site in Nuneaton and Bedworth in 2023.

Annual mean NO₂ concentrations in 2023 were lower than those measured in 2022 at all monitoring locations (average reduction of 8.9%).

Exceedances of the annual mean NO₂ objective were measured prior to 2020 within the existing Midland Road / Corporation Street AQMA (AQMA 2). Measured concentrations for the last four years of monitoring have been below 90% of the annual mean NO₂ objective value of 40 µg/m³ (i.e. below 36 µg/m³). However, considering the first year of compliance was achieved in 2020 which was under the impact of COVID-19 lockdown, it is recommended that concentrations within AQMA 2 are reviewed in the 2025 ASR and a decision taken as to whether to revoke the AQMA.

NO₂ concentrations measured in the Leicester Road Gyratory AQMA (AQMA 1) have been below 90% of the annual mean NO₂ objective value of 40 µg/m³ (i.e. below 36 µg/m³) for more than 10 years; concentrations in 2023 (as well as from 2020 to 2022) were all below 75% of the annual mean objective. Revocation of AQMA 1 was recommended by Defra upon review of the 2018 ASR. The recommendation to revoke AQMA 1, was taken to NBBC's Overview and Scrutiny Panel in February 2024. The panel recommended

revocation. The local election process has delayed the next steps of revocation. The plan is to take the report to the September cabinet and for AQMA 1 to be revoked.

Table 2.1 – Declared Air Quality Management Areas

AQMA Name	Date of Declaration	Pollutants and Air Quality Objectives	One Line Description	Is air quality in the AQMA influenced by roads controlled by Highways England?	Level of Exceedance: Declaration	Level of Exceedance: Current Year	Number of Years Compliant with Air Quality Objective	Name and Date of AQAP Publication	Web Link to AQAP
AQMA 1 – Leicester Road Gyratory, Nuneaton	Declared 01/03/2007	NO ₂ Annual Mean	An area of Nuneaton centred on the Leicester Gyratory system and incorporating sections of the Leicester, Old Hinckley and Weddington Roads	NO	43 µg/m ³	23.8 µg/m ³	>10	Nuneaton and Bedworth Borough Council, Air Quality Action Plan 2022	Link to AQAP
AQMA 2 – Midland Road / Corporation Street, Nuneaton	Declared 01/10/2009	NO ₂ Annual Mean	Centred on Midland Road and Corporation Street but also includes parts of Central Avenue and Manor Court Road	NO	53 µg/m ³	31.6 µg/m ³	4	Nuneaton and Bedworth Borough Council, Air Quality Action Plan 2022	Link to AQAP

- Nuneaton and Bedworth Borough Council confirm the information on UK-Air regarding their AQMA(s) is up to date.
- Nuneaton and Bedworth Borough Council confirm that all current AQAPs have been submitted to Defra.

2.2 Progress and Impact of Measures to address Air Quality in Nuneaton and Bedworth Borough Council

Defra's appraisal of last year's ASR stated that conclusions reached were accepted for all sources and pollutants, and that the report overall was well structured, detailed and provided the information specified in the Guidance. It was concluded that: *"Overall, the report is well structured and provides a good amount of detail. The Council is commended for their hard work in improving air quality across the Borough."* The following comments are raised in the appraisal:

- It has been noted that AQMA 1 has been compliant for 10 years. Following a strengthened approach in 2023, it is now recommended that this AQMA is revoked in the upcoming year. Monitoring should continue at site AQM to highlight the possible impacts of housing development(s) surrounding the AQMA. Where possible, details of the housing development(s) and any submitted air quality assessments could be included in future ASRs to support the decision to revoke.

Revocation of AQMA 1 was recommended by Defra upon review of the 2018 ASR. The recommendation to revoke AQMA 1, was taken to NBBC's Overview and Scrutiny Panel in February 2024. The panel recommended revocation. The local election process has delayed the next steps of revocation. The plan is to take the report to the September cabinet and for AQMA 1 to be revoked.

- Graphs highlighting the trends of monitored concentrations at diffusion tube sites have been provided. These are clear and well-formatted. It may be useful to include a line highlighting the annual mean objective for easy comparison.

The 2024 ASR presents graphs highlighting the trends of monitored concentrations at diffusion tube sites and a line of the annual mean objective has been included.

- Excellent figures have been provided demonstrating the locations of AQMAs and monitoring sites. Monitoring sites are easy to distinguish, and the labels are clear to read. The Council should continue to produce figures of the same standard in future ASRs.

The 2024 ASR continue to present figures of AQMA locations and monitoring sites of the same standard.

- The Council have addressed the comments from the previous ASR appraisal. This demonstrates good practice, and the Council should continue to address all future appraisal comments in future reports.

The 2024 ASR continue to address the comments from the previous ASR appraisal for better reporting.

- It should be confirmed within the report, underneath Table B.1, whether the diffusion tube data has been uploaded into the DTDES.

It has been stated in this report that the diffusion tube data has been uploaded into the DTDES.

Nuneaton and Bedworth Borough Council has taken forward a number of direct measures during the current reporting year of 2023 in pursuit of improving local air quality. Details of all measures completed, in progress or planned are set out in Table 2.2. Five measures are included within Table 2.2, with the type of measure and the progress Nuneaton and Bedworth Borough Council have made during the reporting year of 2023 presented. Where there have been, or continue to be, barriers restricting the implementation of the measure, these are also presented within Table 2.2.

More detail on these measures can be found in the [Nuneaton and Bedworth Air Quality Action Plan](#), which was updated in 2022. This Action Plan aims to improve air quality in Nuneaton and Bedworth Borough Council's AQMAs through the following means:

- Enhancing cycling infrastructure, along with creating new infrastructure to encourage sustainable travel;
- Reducing congestion;
- Promoting active travel and alternatively fuelled vehicles; and
- Ongoing implementation of the Air Quality Supplementary Planning Document (SPD), which was adopted in 2020, to ensure air quality is fully considered in the development control process.

Key completed measures are:

- Vehicle Policy relating to taxis and private hire vehicles came into effect in October 2023 - all taxis and private hire vehicles have to be Euro 4 or above. This will have a positive impact on air quality as the vehicle fleets will become less polluting;
- Warwickshire Energy Strategy was adopted in 2023;

- Warwickshire's Local Cycling and Walking Infrastructure Plan (LCWIP) was approved by Warwickshire County Council in February 2024;
- Warwickshire County Council approved a new EV (Electric Vehicle) Parking Policy. This policy allows the council to make on-street EV charging bays 'EV-Only';
- Nuneaton and Bedworth Borough Council (NBBC) Health and Wellbeing Officer Steering Group was established in 2023. Amongst other issues the group aims to raise awareness of air quality on the health and wellbeing of employees;
- Since August 2022, the Safe and Active team have completed 72 'Dr. Bike' safety checks and security marked 55 bikes within NBBC, all helping to encourage modal shift;
- An Award Programme has been introduced in schools to decrease the number of car journeys, increase walking, cycling and scooting and educate on the benefits of active travel on health and the environment. For the academic year 23-24, fourteen primary schools across Nuneaton and Bedworth received 'Safe and Active Travel' awards training. Many of these schools have also promoted active travel throughout the year, with activities such as Bike to School week and Bikeability Cycle Training; and
- NBBC have secured a grant of over 3 million pounds from the Government's Public Sector Decarbonisation Scheme to invest in the Pingles Leisure Centre in Nuneaton. The investment will see new commercial heat pumps installed to replace the existing gas boilers. This will not only help meet NBBC's Net Zero target but have a positive impact on local air quality by reducing emissions from the leisure centre.

Another significant development is the completion of the Bermuda Connection scheme, with the Bermuda Bridge opening in 2024. During 2023, the residential road where monitoring site NB47 is located was reduced to one lane for the entire calendar year and controlled by traffic lights. The scheme has opened an existing pedestrian bridge (Bermuda Bridge) to two-way traffic, aiming to reduce congestion and improve air quality in parts of the town centre while enhancing connectivity. Data from monitoring location NB47 will be used to determine the impact of additional traffic on residents living near the bridge, now that it is fully operational.

Nuneaton and Bedworth Borough Council expects the following measures to be completed over the course of the next reporting year:

- Support and collaborate with WCC on traffic management measures directly impacting Midland Road, particularly the continuation of the Ring Road upgrades;
- Promote behaviour change away from single occupancy private vehicle use;
- Promote the use of alternatively fuelled vehicles;
- Develop policies to support better air quality; and
- Control domestic emissions.

Nuneaton and Bedworth Borough Council's priorities for the coming year are that the air quality objectives continue to be met along Midland Road in Nuneaton, largely through traffic management measures as well as encouragement of alternatively fuelled vehicles (in particular electric cars and buses).

Nuneaton and Bedworth Borough Council worked to implement these measures in partnership with the following stakeholders during 2023:

- Warwickshire County Council;
- Warwickshire County Council Highway Authority;
- Consultant in Public Health, Warwickshire; and
- Transforming Nuneaton team.

The principal challenges and barriers to implementation that Nuneaton and Bedworth Borough Council is facing are issues concerning funding. Previously funded costly upgrades to the ring road as part of TNP, including works to improve traffic flow in AQMA2 have had funding reallocated. The road schemes were to be funded partly through the My Town government cash scheme – however, other regeneration projects within the TNP have now been prioritised. The road and cycling infrastructure schemes are being reviewed by WCC.

Nuneaton and Bedworth Borough Council anticipates that the measures stated above and in Table 2.2 will help maintain compliance in AQMA 2 – Midland Road / Corporation Street.

Table 2.2 – Progress on Measures to Improve Air Quality

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
1	Promote Behaviour Change away from Single Occupancy Private Vehicle Use	Promoting Travel Alternatives	Encourage/ facilitate home working, active travel campaign & infrastructure, Personalised Travel Planning, Promotion of Cycling, Promotion of Walking, School Travel Plans, Workplace Travel Planning	Ongoing and 2021 onwards	Ongoing for the measure as a whole,	WCC and NBBC	WCC	Possible	Ongoing	>£10 million for all aspects of the measure	Ongoing projects	n/a – strategic measure which will also assist in achievement of air quality objective in AQMA	Monitoring strategy for LTP	<p>Ongoing work with schools and businesses, and travel plans through planning system.</p> <p>Warwickshire's Local Cycling and Walking Infrastructure Plan (LCWIP) was approved by the County Council in February 2024. This County wide plan aims to create a safe and attractive environment for walking, wheeling and cycling, so that these modes become the natural choices for shorter journeys and outdoor recreation.</p> <p>Planning permission was been granted for a segregated pedestrian and cyclist pathway along a section of Corporation Street which is located in AQMA 2. This was due to be constructed in 2023, however this scheme is now on hold as funding has been withdrawn.</p> <p>WCC is pausing work on the development of new cycle routes on the A47 Nuneaton between Eton College and the A5 to consider next steps and funding options. This is due to a combination of factors including concerns over the level of community support for initial proposals, which to unlock funding had been designed to meet Government infrastructure design guidance and therefore provided dedicated facilities for cyclists wherever feasible. Designs included utilising some of the existing carriageway to create space for the proposed cycling infrastructure. In addition, the Hinckley</p>	<p>A number of initiatives across the borough encourage walking and cycling, Not costed specifically as wider measures to reduce emissions.</p> <p>The TNP incorporates cycling infrastructure improvements, but reallocation of funds means that several planned schemes have been halted.</p>

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
															<p>Road section is yet to secure all funding needed based on initial designs. To avoid potential abortive work, the Council also wants to clarify how the proposals will link with National Highways' emerging proposals for the A5 at Dodwells as well as potential additional housing development in the area. The pause provides an opportunity to reflect on work completed to date alongside the wider opportunities and constraints affecting the scheme, wider transport network and strategic growth requirements with the aim of presenting recommendations to elected members during 2024 for how local needs can best be met.</p> <p>The A444 Weddington Road cycle route has also been paused due to it's funding being reallocated to alternative priorities within the TNP. Work to review the scheme and the funding required to deliver it at a later date is underway.</p> <p>Information promoting active travel (walking, wheeling and cycling) can be found on WCC website. Including, active travel maps, cycle training and active travel schemes. WCC are currently piloting a School Streets traffic management scheme, which closes the school road to traffic at the start and end of the school day. The impact of these changes on active travel and air quality are being monitored and will be assessed to decide if the</p>

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
														<p>change should be made permanent and possibly implemented at other schools across Warwickshire including Nuneaton and Bedworth.</p> <p>WCC run 'Cars and Kids Don't Mix' campaign which encourages walking to school. Officers continue to use the ethos of #JustOneJourney when talking to residents, businesses, and community groups across Warwickshire, to encourage residents to choose more active travel. The Active Travel team review and provide comments on Travel Plans that are submitted as conditions for planning approval. They also support those responsible for delivering travel plans, by offering advice, guidance and practical support – such as events, resources and access to digital tools.</p> <p>The Safe and Active team also both deliver and support events. In Nuneaton and Bedworth, they have delivered a number of events at Leisure centres and at the George Eliot Hospital. Since August 2022, they have completed 72 'Dr. Bike' safety checks and security marked 55 bikes within NBBC, all helping to encourage modal shift.</p> <p>An Award Programme has been introduced in schools to decrease the number of car journeys, increase walking, cycling and scooting and educate on the benefits of active travel on health and the environment. For the academic year 23-24,</p>	

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation	
															fourteen primary schools across Nuneaton and Bedworth received 'Safe and Active Travel' awards training. Many of these schools have also promoted active travel throughout the year, with activities such as Bike to School week and Bikeability Cycle Training.	
2	Promote the use of Alternatively Fuelled Vehicles	Promoting Low Emission Transport	Priority Parking for LEVs, procuring alternative refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging, taxi emission incentives, taxi licensing conditions	Ongoing and 2021 onwards	Ongoing with aim to become carbon neutral by 2030	WCC and NBBC	DfT, Office for Low Emission Vehicles (OLEV), Energy Savings Trust (EST), WCC	Possible	Ongoing	£1-10 million	Ongoing – some EV charging points already completed	n/a – strategic measure which will also assist in achievement of air quality objective in AQMA	Proportion of alternatively fuelled vehicles in the fleet on Warwickshire's roads	Electric Vehicle (EV) Charging points EV charging points increasing in NBBC as funding will allow. All new developments are required to have EV charging points in line with the Air Quality SPD. WCC have been awarded an allocation of Local Electric Vehicle (LEV1) funding from Central Government which will be used to rollout on and off-street charging infrastructure in the coming years. The total number of charge points and their locations are still to be determined, but WCC's focus is on providing widespread and evenly distributed coverage for the whole county. WCC recently adopted a new EV Parking Policy that will allow WCC to make parking spaces adjacent to EV charge points 'EV-charging only'. This will make it easier for drivers to access the charge points, and give future EV drivers confidence to swap their vehicles, lowering emissions. Changes will be made via the TRO process and will be open to consultation. WCC have also secured funding through the Towns Fund for EV charging	EV charging infrastructure to be implemented over next few years in line with Carbon Reduction Strategy. High cost, but grants and private sector funding available and will be actively targeted.	

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
														<p>points. An additional 10 charging points are to be installed in Abbey Street in 2024.</p> <p>Resident engagement is encouraged through the dedicated EV web pages and suggests of locations for EV charging points are welcomed.</p> <p>WCC are also trialling cable protectors to enable home charging on terraced streets.</p> <p>EV Buses</p> <p>National Express Coventry are now operating 130 all electric buses on several routes, some of which are cross boundary into NBBC.</p> <p>National Express Coventry are procuring a further 20 all- electric buses to complete their fleet by 2025, some of which may be cross boundary into NBBC.</p> <p>Stagecoach Midlands and Transport for West Midlands (TfWM) are close to signing of a Grant Agreement and Delivery Programme for their electric buses and at-depot charging infrastructure, Several of these routes are cross boundary into NBBC.</p> <p>WCC are working with TfWM to incorporate several cross boundary services operated by WCC into the Coventry All-electric bus scheme. Many of which cross boundary into NBBC.</p> <p>Additional funding has also been secured through the Warwickshire Zero Emission Bus Regional Area 2 (ZEBRA 2) by Stagecoach Midlands and WCC. The</p>	

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
														<p>scheme will introduce 27 all-electric buses on several routes within Nuneaton and be supported by charging infrastructure at the Nuneaton bus depot.</p> <p>Taxis Policy</p> <p>The Vehicle Policy relating to taxis was approved by committee in 2023 and came into effect in October 2023. NBBC no longer accepts vehicle licence applications for hackney carriage and private hire vehicles that are Euro 4 or less.</p>	
3	Control Domestic Emissions	Promoting Low Emission Plant	Regulations for fuel quality for stationary and mobile sources	2022	n/a	NBBC	NBBC	Possible	Ongoing	<£10K unless a significant project on solid fuel burning is progressed	Ongoing, SPD already completed	n/a – strategic measure which will also assist in achievement of air quality objective in AQMA	Level of solid fuel burning	<p>2023 saw the completion of: 52 external wall insulations, 214 central heating system replacements, 59 loft insulations, 6 Cavity wall insulations, 2 solar panels and 1 air source heat pump, through home efficiency grants for Private Sector housing.</p> <p>As part of the Social Housing Decarbonisation Fund (SHDF) Wave 1, 212 properties benefited from external wall insulation in 2023. Additional funding has been secured as part of SHDF Wave 2.1. This will be used to improve the energy efficiency in an additional 150 local authority owned dwellings.</p>	Very difficult to quantify any change in the level of solid fuel burning without detailed survey work. Cost of measure already within existing budgets.
4	Develop Policies to Support Better Air Quality	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance, Low emission strategy, other policy, regional groups	Ongoing and 2021 onwards	n/a – ongoing collaborative working	NBBC	Mainly from existing budgets at both Borough and County level. Planning system generates funding, which could be used for measures within this Action Plan.	Possible	Ongoing	<£10K unless significant projects are progressed	Ongoing, SPD already completed	n/a – strategic measure which will also assist in achievement of air quality objective in AQMA	n/a as no specific projects identified as yet	<p>Air Quality SPD adopted and being implemented. Working closely with Warwickshire Public Health, mainly through the Warwickshire and Coventry Air Quality Alliance .</p> <p>Discussions are ongoing with Development Control Officers, to develop Planning Policy for the allocation of</p>	Non statutory function will require additional resources to implement. No specific budget for this work as ongoing collaborative work.

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
														damage costs money obtained through the planning process to projects to improve air quality..	
5	Support and Collaborate with Warwickshire County Council on Traffic Management Measures Directly Impacting Midland Road	Traffic Management	Strategic Highway Improvements	2021 onwards	The scheme will be phased with the first phase due to be completed 2024. The whole scheme is anticipated to be completed by the end of 2025	WCC and NBBC	Developer contributions, Transforming Nuneaton project	No	Funding secured by WCC	>£10 million (including existing programme)	In planning phase	Reductions large enough to achieve the annual mean NO2 at all relevant monitoring locations	Traffic flows on Midland Road, Nuneaton, and resulting nitrogen dioxide concentrations	<p>The Transforming Nuneaton Programme (TNP) which included significant highway improvement schemes that were predicted to have a positive impact on the Midland Road AQMA (AQMA2) has been subjected to significant funding reductions. This means that the regeneration programme has had to be scaled back.</p> <p>The Abbey green cycleway, has been paused until a full north-west corridor scheme can be found and funded - there are currently no timescales.</p> <p>Funds originally allocated for the Corporation Street works have been reallocated by NBBC's Cabinet, into other Towns Fund projects. As the scheme is no longer fully funded work has halted on this scheme.</p> <p>Prior to the scaling back of the TNP a preliminary assessment of the Midland Road and Corporation Street corridor was conducted in 2023. It was concluded that no additional traffic management measures were necessary outside of the proposed major TNP works. Due to reallocation of funds and delays to the implementation of the major schemes, interim measures will be reassessed.</p> <p>Towns fund money originally allocated for the Wheat Street part of the scheme has also been</p>	Upgrades to the Ring Road are high cost. Significant funding that had been secured has been reallocated in cost reduction measures. Some additional funding has been secured from s106 agreements.

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation	
																<p>reallocated by NBBCs cabinet. However, the shortfall for this project has been plugged from s106 contributions. Design work is due to recommence and it is anticipated that works on site will commence early 2025.</p> <p>The Leicester Road gyratory part of the scheme (AQMA 1) is progressing, with design work and land negotiations both ongoing.</p>

2.3 PM_{2.5} – Local Authority Approach to Reducing Emissions and/or Concentrations

As detailed in Policy Guidance LAQM.PG22 (Chapter 8) and the Air Quality Strategy⁷, local authorities are expected to work towards reducing emissions and/or concentrations of fine particulate matter (PM_{2.5}). There is clear evidence that PM_{2.5} (particulate matter smaller 2.5 micrometres) has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases.

The 2018-based background pollutant maps published by Defra⁸, which predict concentrations across the UK on a 1 x 1km grid, show that predicted 2023 concentrations of PM_{2.5} within Nuneaton and Bedworth Borough Council are well below the annual mean air quality objective of 25 µg/m³, alongside the annual mean targets published in the Environment Act 2021, corresponding to an interim target of 12 µg/m³ to be achieved by the start of 2028⁹, and a long-term target of 10 µg/m³ to be achieved by the end of 2040. The highest concentration is predicted to be 11.2 µg/m³ (predicted for 2023 from base year 2018), located in Exhall close to the Coventry Road.

Background concentrations of PM_{2.5} are predicted to decrease into the future.

The Public Health Outcomes Framework tool¹⁰, compiled by Public Health England, has a number of public health indicators that are used for public health actions, to identify areas of health inequality and concern, and monitor the differences in health impacts across regions in the UK. This framework includes an indicator “D01- Fraction of Mortality Attributable to Particulate Air Pollution” which is calculated using background annual average PM_{2.5} concentrations, modelled at a 1km² resolution based on measured concentrations from the AURN. The fraction of mortality attributable to particulate air

⁷ Defra. Air Quality Strategy – Framework for Local Authority Delivery, August 2023

⁸ Defra. Background Mapping data for local authorities - 2018. Available: [UK-AIR Background Mapping](#)

⁹ Meaning that it will be assessed using measurements from 2027. The 2040 target will be assessed using measurements from 2040. National targets are assessed against concentrations expressed to the nearest whole number, for example a concentration of 10.4 µg/m³ would not exceed the 10 µg/m³ target.

¹⁰ Public Health England. Public Health Outcomes Framework tool, 2023. Available: [Public Health Outcome Framework - Data - OHID \(phe.org.uk\)](#)

pollution in Nuneaton and Bedworth in 2022 was 5.8%, which is in line with the England average of 5.8%. The 2022 data is presented as the 2023 dataset has not been made available at the time of writing.

Nuneaton and Bedworth Borough Council is working to reduce emissions of air pollution across the borough, with many of the measures designed to reduce emissions of NO₂ also reducing emissions of PM₁₀ and PM_{2.5}:

- NBBC will be reviewing and improving the information on our website and social media communication platforms, relating to PM_{2.5}. NBBC aim to raise awareness of the impacts that woodburning stoves and open fireplaces have on local levels of PM_{2.5} concentrations and indoor air pollution.
- NBBC will be utilising the findings of an NBBC officers MSc project that assessed the indoor levels of PM_{2.5} associated with the burning of solid fuel. This will support education to control domestic emissions of PM_{2.5}. The findings have been presented to the Air Quality Alliance for Coventry and Warwickshire, to help support the knowledge and help shape future planned Public Health projects in Warwickshire on internal PM_{2.5} from woodburning stoves.
- There has been significant house building in NBBC, changing the development boundary. NBBC will be reviewing the smoke control areas to make sure that they incorporate all relevant areas.
- Defra have selected a site in Bedworth to install a monitoring station for the National PM_{2.5} monitoring network.
- NBBC have secured a grant of over 3 million pounds from the Government's Public Sector Decarbonisation Scheme to invest in the Pingles Leisure Centre in Nuneaton. The investment will see new commercial heat pumps installed to replace the existing gas boilers. This will not only help meet NBBC's Net Zero target but have a positive impact on local air quality by reducing emissions from the leisure center.

The following pollutant emission reduction measures included within Nuneaton and Bedworth Borough Council's AQAP are also likely to reduce emissions of PM_{2.5}:

- Traffic management measures targeted at Midland Road;
- Behaviour change away from single occupancy private vehicle use;
- Promoting the use of alternatively fuelled vehicles;
- Developing planning policies to support better air quality; and
- Controlling domestic emissions.

3 Air Quality Monitoring Data and Comparison with Air Quality Objectives and National Compliance

This section sets out the monitoring undertaken within 2023 by Nuneaton and Bedworth Borough Council and how it compares with the relevant air quality objectives. In addition, monitoring results are presented for a five-year period between 2019 and 2023 to allow monitoring trends to be identified and discussed.

3.1 Summary of Monitoring Undertaken

3.1.1 Automatic Monitoring Sites

Nuneaton and Bedworth Borough Council does not undertake automatic (continuous) monitoring.

3.1.2 Non-Automatic Monitoring Sites

Nuneaton and Bedworth Borough Council undertook non- automatic (i.e. passive) monitoring of NO₂ at 39 sites during 2023. Table A.1 in Appendix A presents the details of the non-automatic sites.

Since 2021, the roadside monitor AQM has changed from a duplicate to a single monitoring site. One new monitoring site was installed in November 2022 (NB54), located on 139 The Longshoot to monitor the potential air quality impact of the strategic housing allocation to the north of Nuneaton. The installation of NB54 was a response to a concern raised by local residents and the appraisal comment of 2022 ASR stated “*the Council have highlighted that the revocation of AQMA 1 is to be delayed due to the construction of new housing developments. This demonstrates that the Council is committed to maintaining good air quality and ensuring that areas of concern are highlighted. The Council could consider additional monitoring around this area to further support the revocation of the AQMA and to gather information on the impacts of the new housing developments*”.

Maps showing the location of the monitoring sites are provided in Appendix D. Further details on Quality Assurance/Quality Control (QA/QC) for the diffusion tubes, including bias adjustments and any other adjustments applied (e.g. annualisation and/or distance correction), are included in Appendix C.

3.2 Individual Pollutants

The air quality monitoring results presented in this section are, where relevant, adjusted for bias, annualisation (where the annual mean data capture is below 75% and greater than 25%), and distance correction. Further details on adjustments are provided in Appendix C.

3.2.1 Nitrogen Dioxide (NO₂)

Table A.2 in Appendix A compare the adjusted monitored NO₂ annual mean concentrations for the past five years with the air quality objective of 40µg/m³. Note that the concentration data presented represents the concentration at the location of the monitoring site, following the application of bias adjustment and annualisation, as required (i.e. the values are exclusive of any consideration to fall-off with distance adjustment). There is one monitoring site in 2023 requiring annualisation (where the annual mean data capture is below 75% and greater than 25%). The annualisation detail is provided in Appendix C.

For diffusion tubes, the full 2023 dataset of monthly mean values is provided in Appendix B. Note that the concentration data presented in Table B.1 includes distance corrected values, only where relevant.

In 2023, annual mean NO₂ concentrations experienced an average decrease of 2.1µg/m³ which is 8.9% reduction when compared with average 2022 annual mean concentrations. There were no recorded exceedances of the annual mean NO₂ objective, or concentrations within 10% of the objective, at any of the monitoring sites in Nuneaton and Bedworth in 2023. The highest annual mean NO₂ concentration in 2023 was recorded at roadside site NB29 within the Midland Road / Corporation Street AQMA (AQMA 2), which measures a concentration of 31.6µg/m³.

Within the Leicester Road Gyratory AQMA (AQMA 1), the highest concentration in 2023 was recorded at roadside site AQM, with a value of 23.8µg/m³. Concentrations have remained below the objective within AQMA 1 for more than 10 years. It has therefore been recommended that this AQMA is revoked. The recommendation to revoke AQMA 1, was taken to NBBC's Overview and Scrutiny Panel in February 2024. The panel recommended revocation. The local election process has delayed the next steps of revocation, the plan is to take the report to the next cabinet and for AQMA 1 to be revoked as soon as possible.

Within the Midland Road / Corporation Street AQMA (AQMA 2), there were no recorded exceedances of the annual mean NO₂ objective, or concentrations within 10% of the objective since 2020 and achieve compliance for consecutive four years. The highest concentration in 2023 within AQMA 2 was recorded at roadside site NB29, with a value of 31.6µg/m³. The concentrations within AQMA 2 on average decreased 2.8µg/m³ from 2022 to 2023. Considering the first year of compliance within AQMA 2 was achieved in 2020 which was under the impact of COVID-19 lockdown and exceedances were recorded at NB29 and NB30 in 2019, it is recommended that concentrations within AQMA 2 are reviewed in the 2025 ASR. If five consecutive years of compliance is achieved in 2024, the AQMA 2 will be revoked.

The impact of the Bermuda Connection scheme on local air quality can be observed through the monitoring results at site NB47. In 2023, the residential road where NB47 is located was reduced to one lane for the entire year and controlled by traffic lights to enable road works to progress. The annual mean NO₂ concentration decreased to 13.1 µg/m³ in 2023 due to the traffic control for road works. Continued monitoring at this location will be important to assess the long-term air quality impacts now that the bridge is fully operational.

Figure A.1 and Figure A.2 present the trend in measured annual mean NO₂ concentrations over the past five years (2019 to 2023) at monitoring sites within AQMA 1 and AQMA 2, respectively. Figure A.3 presents the trend in measured annual mean NO₂ concentrations over the same period at the remainder of the monitoring sites located within Nuneaton, while Figure A.4 presents the trend for monitoring sites within Bedworth.

No monitoring site measured an annual mean NO₂ concentration greater than 60µg/m³ in 2023, indicating that an exceedance of the 1-hour mean NO₂ objective was highly unlikely.

Appendix A: Monitoring Results

Table A.1 – Details of Non-Automatic Monitoring Sites

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
AQM	AQ Monitor, Leicester Rd	Roadside	436844	292251	NO ₂	YES -AQMA 1	1.5	4.2	No	1.3
NB01	142 Norman Avenue	Urban Background	435969	291303	NO ₂	NO	N/A	N/A	No	1.8
NB02	5 Conifer Close	Urban Background	436427	287646	NO ₂	NO	N/A	N/A	No	2.1
NB04	Leisure Ctr 72 Coventry Rd	Roadside	435793	286545	NO ₂	NO	0.0	3.6	No	3.2
NB06	Tudor Ct Bowling Green Ln	Roadside	434313	285292	NO ₂	NO	11.0	0.9	No	2.9
NB07	115 Newtown Rd Bedworth	Roadside	435345	286992	NO ₂	NO	6.0	4.4	No	2.4
NB09	Church, Manor Ct Rd	Roadside	435634	292280	NO ₂	YES -AQMA 2	1.5	2.2	No	2.4
NB15	Bridge Grove, Leicester Rd	Roadside	436883	292302	NO ₂	YES -AQMA 1	8.0	1.4	No	2.3
NB17	Balti Hut, 41 Bond Gate	Roadside	436393	291987	NO ₂	NO	0.0	1.3	No	2.3
NB18	Wheat St, Nuneaton	Roadside	436525	291863	NO ₂	NO	23.0	4.0	No	2.3

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
NB20	17 Old Hinckley Rd	Roadside	436604	292202	NO ₂	YES -AQMA 1	0.0	6.9	No	2.0
NB22	58 Old Hinckley Rd	Roadside	436810	292306	NO ₂	YES -AQMA 1	0.0	8.8	No	1.9
NB23	46 Leicester Rd Nuneaton	Roadside	436841	292280	NO ₂	YES -AQMA 1	0.0	4.5	No	2.1
NB24	Lodge, 31 Leicester Rd	Roadside	436812	292196	NO ₂	YES -AQMA 1	0.0	11.0	No	2.2
NB25	25 Central Avenue	Roadside	435814	292274	NO ₂	YES -AQMA 2	0.0	6.4	No	2.1
NB26	26 Central Avenue	Roadside	435759	292311	NO ₂	YES -AQMA 2	0.0	4.6	No	2.1
NB27	90 Corporation St	Roadside	435950	292113	NO ₂	YES -AQMA 2	0.0	4.8	No	2.4
NB28	138 Corporation St	Roadside	435893	292205	NO ₂	YES -AQMA 2	0.0	4.7	No	2.4
NB29	16 Midland Road	Roadside	435626	292343	NO ₂	YES -AQMA 2	0.0	4.0	No	2.1
NB30	52 Midland Road	Roadside	435554	292378	NO ₂	YES -AQMA 2	0.0	3.8	No	2.1
NB31	376 Longford Road	Roadside	435146	284563	NO ₂	NO	0.0	12.7	No	2.5
NB35	60 Watling St	Roadside	439268	293457	NO ₂	NO	0.0	11.7	No	1.9
NB36	78 Coventry Rd Exhall	Roadside	435217	285246	NO ₂	NO	0.0	2.3	No	2.3

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
NB37	19 Croft Road Nuneaton	Roadside	435051	291594	NO ₂	NO	0.0	5.8	No	2.0
NB38	115 Highfield Rd	Roadside	437198	290732	NO ₂	NO	0.0	7.2	No	1.8
NB41	11 Newtown Rd (salon)	Roadside	435619	287042	NO ₂	NO	0.0	4.8	No	2.0
NB42	18 George Street Bedworth	Roadside	435655	287135	NO ₂	NO	0.0	8.3	No	1.8
NB43	43 Hanover Glebe	Roadside	436303	290796	NO ₂	NO	0.0	11.6	No	2.0
NB44	503 Heath End Rd	Roadside	434298	290930	NO ₂	NO	2.0	2.3	No	2.2
NB45	80 Heath End Rd	Roadside	435593	290728	NO ₂	NO	4.6	2.5	No	2.4
NB46	30 Bermuda Rd	Roadside	435135	290583	NO ₂	NO	0.0	9.2	No	2.0
NB47	10 The Bridleway	Roadside	435452	290087	NO ₂	NO	0.0	4.6	No	2.0
NB48	288 Heath End Rd	Roadside	435066	290689	NO ₂	NO	0.0	8.5	No	2.1
NB49	Co-op Coventry Rd	Roadside	435231	285236	NO ₂	NO	0.0	4.2	No	2.5
NB50	66 Coventry Rd Exhall	Roadside	435201	285198	NO ₂	NO	0.0	8.3	No	2.3
NB51	Abbey Green School	Roadside	435638	292357	NO ₂	YES -AQMA 2	0.0	5.0	No	2.2

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
NB52	Bridge St, Mower Shop*	Roadside	436147	290868	NO ₂	NO	3.0	7.2	No	2.2
NB53	McDonnell Drive	Roadside	434846	284736	NO ₂	NO	39	16	No	2.1
NB54	139 The Long Shoot	Roadside	439049	292781	NO ₂	NO	0.0	17.0	No	2.1

Notes:

(1) 0m if the monitoring site is at a location of exposure (e.g. installed on the façade of a residential property).

(2) N/A if not applicable.

Table A.2 – Annual Mean NO₂ Monitoring Results: Non-Automatic Monitoring (µg/m³)

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
AQM	436844	292251	Roadside	100.0	100.0	30.2	24.5	25.8	25.8	23.8
NB01	435969	291303	Urban Background	82.7	82.7	19.3	14.6	15.5	15.0	14.6
NB02	436427	287646	Urban Background	100.0	100.0	18.9	14.3	14.7	14.0	12.4
NB04	435793	286545	Roadside	100.0	100.0	30.1	26.2	27.0	25.5	23.1
NB06	434313	285292	Roadside	92.3	92.3	31.0	25.1	26.4	26.5	24.1
NB07	435345	286992	Roadside	100.0	100.0	30.9	26.0	26.1	24.8	23.3
NB09	435634	292280	Roadside	92.6	92.6	29.9	22.8	23.8	24.7	21.0
NB15	436883	292302	Roadside	100.0	100.0	26.9	21.7	23.3	22.2	21.1
NB17	436393	291987	Roadside	75.0	75.0	28.4	21.5	24.9	25.3	22.7
NB18	436525	291863	Roadside	100.0	100.0	31.6	24.9	27.1	27.0	24.2
NB20	436604	292202	Roadside	100.0	100.0	26.8	21.3	23.0	22.0	20.6
NB22	436810	292306	Roadside	100.0	100.0	24.8	18.4	20.3	19.9	18.5
NB23	436841	292280	Roadside	92.3	92.3	31.0	24.4	25.9	26.2	23.7

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
NB24	436812	292196	Roadside	100.0	100.0	23.9	18.0	19.8	19.4	18.1
NB25	435814	292274	Roadside	92.3	92.3	30.5	24.0	25.2	25.9	23.5
NB26	435759	292311	Roadside	100.0	100.0	28.5	22.9	24.8	25.6	23.3
NB27	435950	292113	Roadside	90.7	90.7	36.0	-	-	31.5	28.5
NB28	435893	292205	Roadside	100.0	100.0	35.7	28.5	29.8	30.2	27.1
NB29	435626	292343	Roadside	100.0	100.0	41.0	33.7	35.2	34.5	31.6
NB30	435554	292378	Roadside	100.0	100.0	42.4	33.0	35.2	34.5	29.9
NB31	435146	284563	Roadside	100.0	100.0	29.1	23.5	25.3	23.7	21.0
NB35	439268	293457	Roadside	100.0	100.0	23.0	16.7	16.8	17.6	15.5
NB36	435217	285246	Roadside	100.0	100.0	33.4	26.6	28.1	27.3	24.3
NB37	435051	291594	Roadside	100.0	100.0	32.3	24.8	28.3	27.5	25.6
NB38	437198	290732	Roadside	100.0	100.0	27.4	22.2	23.1	22.7	21.3
NB41	435619	287042	Roadside	100.0	100.0	30.5	24.9	27.1	25.2	23.2
NB42	435655	287135	Roadside	92.3	92.3	26.7	20.5	21.6	19.5	18.4

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
NB43	436303	290796	Roadside	100.0	100.0	25.0	18.6	20.5	20.1	17.8
NB44	434298	290930	Roadside	100.0	100.0	29.2	22.5	24.9	24.0	21.6
NB45	435593	290728	Roadside	100.0	100.0	32.6	26.6	26.4	27.2	25.0
NB46	435135	290583	Roadside	100.0	100.0	19.1	13.8	14.1	15.2	12.3
NB47	435452	290087	Roadside	100.0	100.0	18.0	14.4	14.9	15.0	13.1
NB48	435066	290689	Roadside	100.0	100.0	22.7	18.3	19.8	18.5	16.9
NB49	435231	285236	Roadside	100.0	100.0	29.1	23.7	25.0	24.2	22.5
NB50	435201	285198	Roadside	50.0	50.0	30.9	25.3	27.0	25.3	24.8
NB51	435638	292357	Roadside	100.0	100.0	27.4	19.7	20.9	21.2	20.9
NB52	436147	290868	Roadside	100.0	100.0	32.1	26.2	26.6	26.6	24.2
NB53	434846	284736	Roadside	100.0	100.0	-	-	23.2	23.6	21.5
NB54	439049	292781	Roadside	100.0	100.0	-	-	-	-	12.5

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22.

Diffusion tube data has been bias adjusted.

Reported concentrations are those at the location of the monitoring site (bias adjusted and annualised, as required), i.e. prior to any fall-off with distance correction.

Notes:

The annual mean concentrations are presented as $\mu\text{g}/\text{m}^3$.

Exceedances of the NO_2 annual mean objective of $40\mu\text{g}/\text{m}^3$ are shown in **bold**.

NO_2 annual means exceeding $60\mu\text{g}/\text{m}^3$, indicating a potential exceedance of the NO_2 1-hour mean objective are shown in **bold and underlined**.

Means for diffusion tubes have been corrected for bias. All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

Concentrations are those at the location of monitoring and not those following any fall-off with distance adjustment.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Figure A.1 – Trends in Annual Mean NO₂ Concentrations – Leicester Road Gyratory AQMA 1

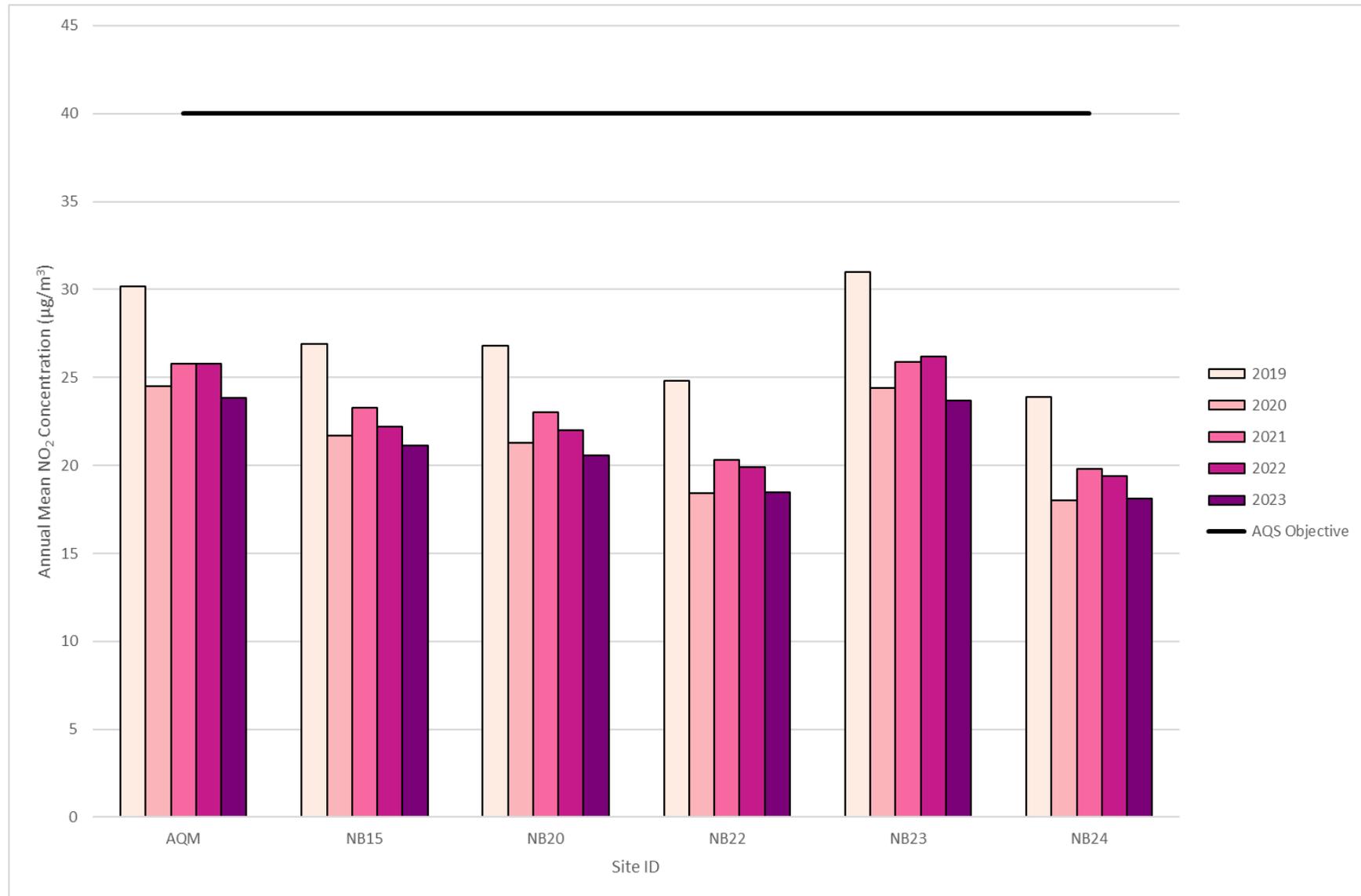


Figure A.2 – Trends in Annual Mean NO₂ Concentrations – Midland Road / Corporation Street AQMA 2

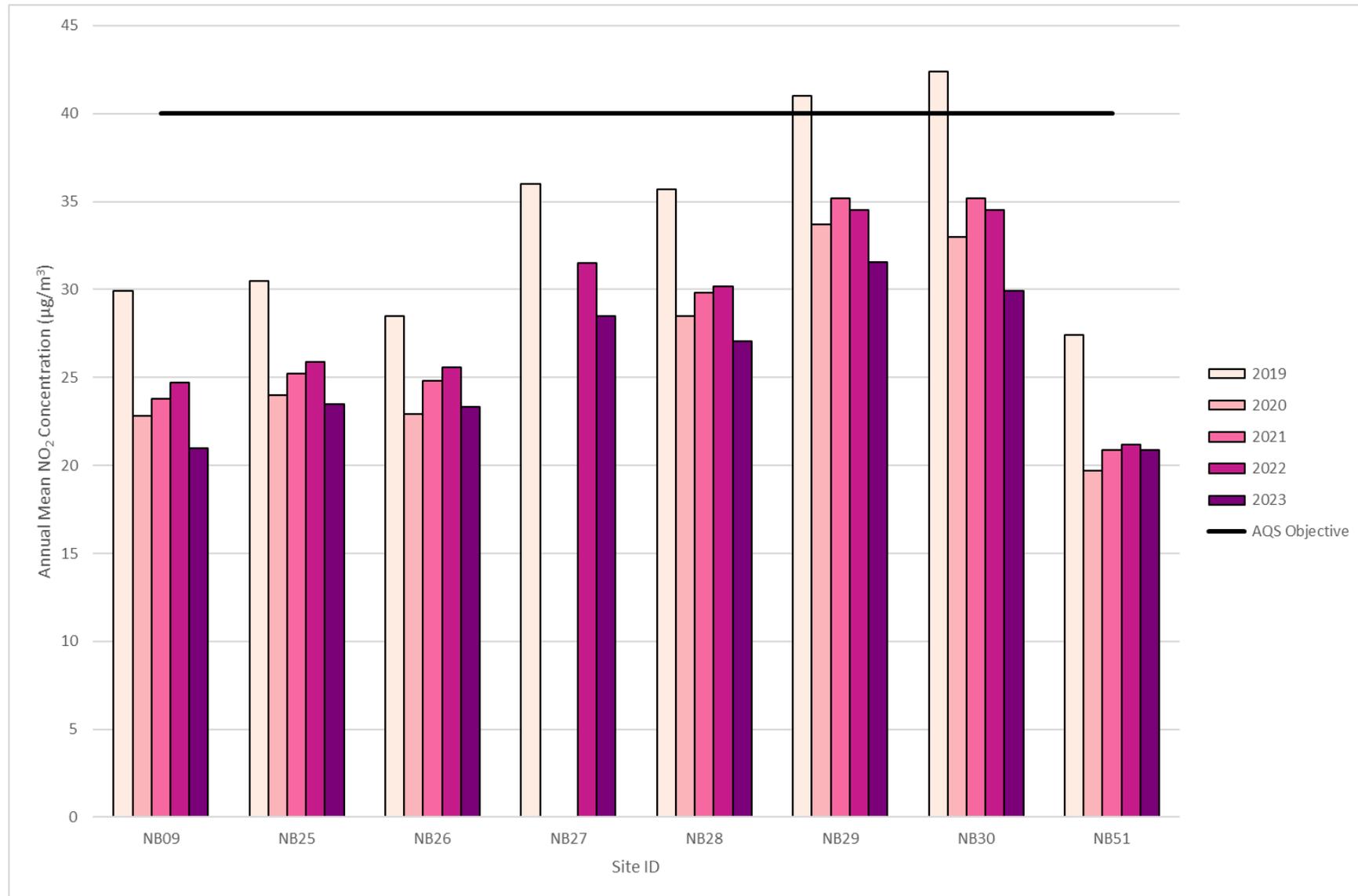


Figure A.3 – Trends in Annual Mean NO₂ Concentrations – Outside of AQMAs: Nuneaton

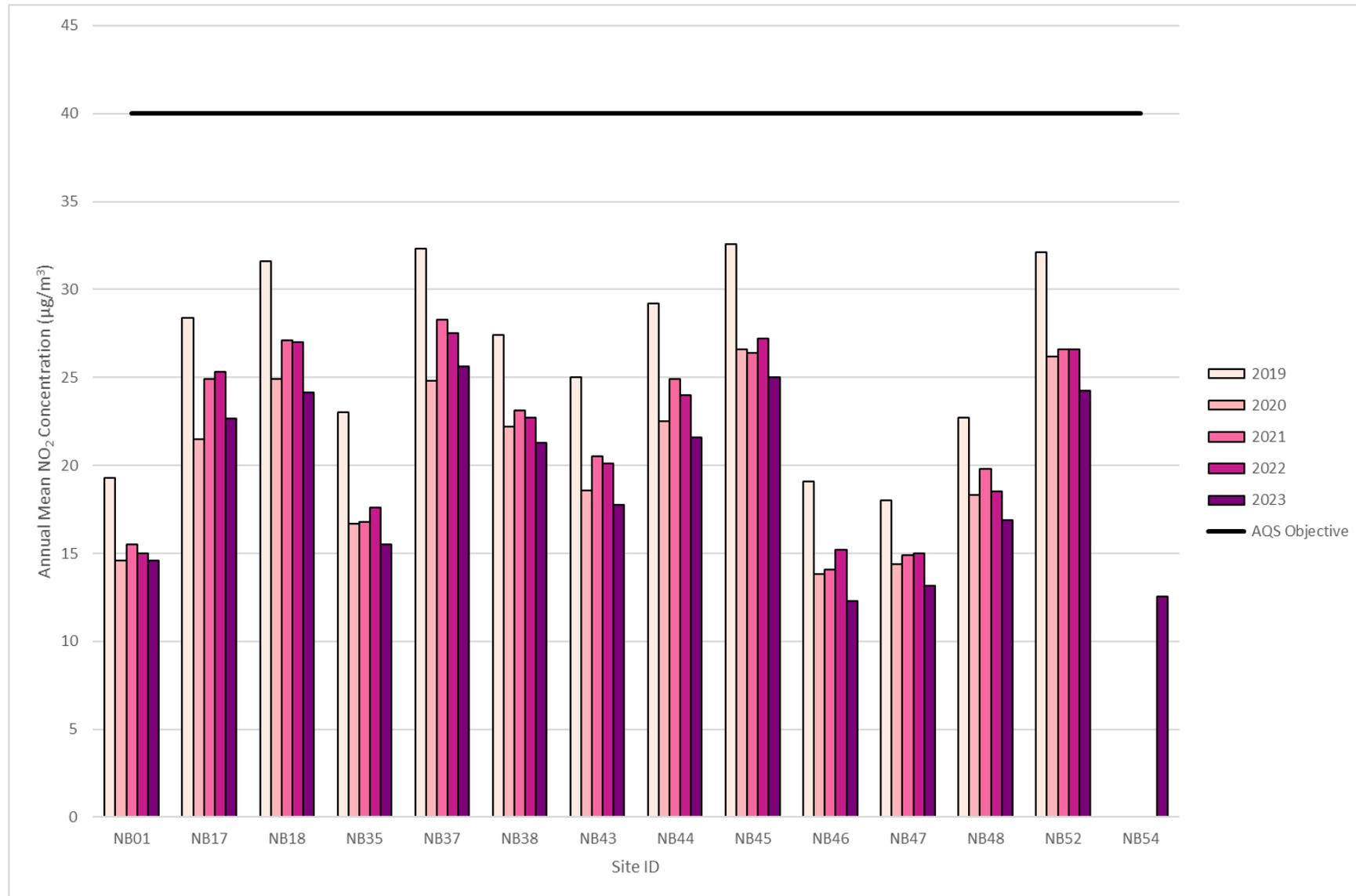
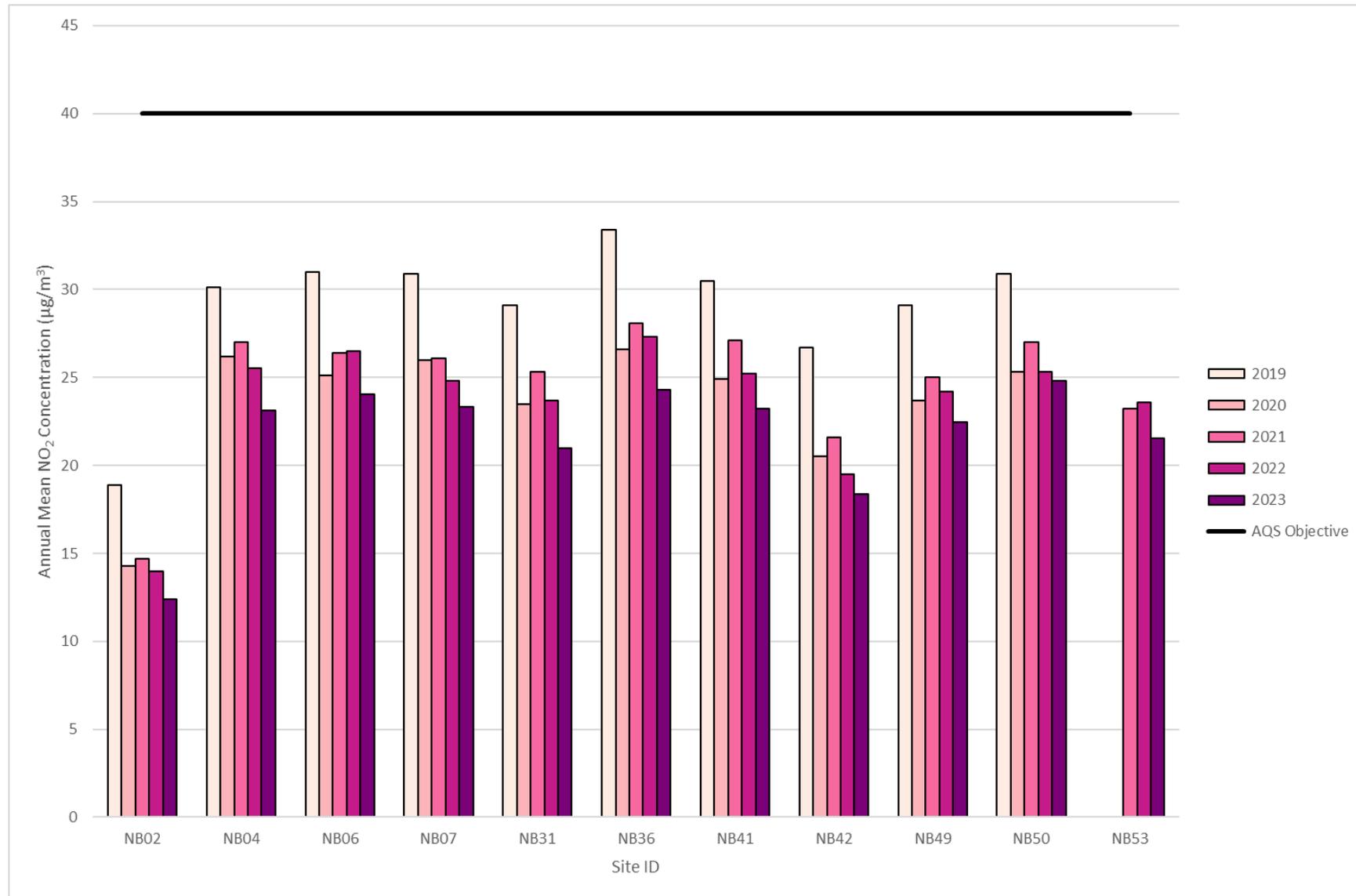


Figure A.4 – Trends in Annual Mean NO₂ Concentrations – Outside of AQMAs: Bedworth



Appendix B: Full Monthly Diffusion Tube Results for 2023

Table B.1 – NO₂ 2023 Diffusion Tube Results (µg/m³)

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.81)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
AQM	436844	292251	36.2	36.3	31.0	27.8	23.9	25.5	27.4	25.0	30.7	28.1	30.6	30.3	29.4	23.8	-	
NB01	435969	291303	23.5	22.1	19.3	16.0	12.6	11.8			16.4	19.1	23.0	16.7	18.0	14.6	-	
NB02	436427	287646	23.2	21.9	16.2	12.6	10.1	8.1	9.1	11.1	15.5	17.2	22.7	16.0	15.3	12.4	-	
NB04	435793	286545	34.9	32.5	30.9	28.3	25.4	24.1	21.9	23.2	30.9	30.7	33.9	26.0	28.6	23.1	-	
NB06	434313	285292	36.2	35.9	29.8	27.9		25.0	28.1	24.5	30.6	29.9	30.1	28.8	29.7	24.1	-	
NB07	435345	286992	36.4	38.6	30.4	26.6	24.0	26.1	21.6	22.3	28.8	28.9	33.6	28.1	28.8	23.3	-	
NB09	435634	292280	34.2		29.5	26.5	23.3	21.2	18.5	21.1	25.9	28.2	31.4	25.5	25.9	21.0	-	
NB15	436883	292302	36.7	35.8	30.1	24.9	20.4	19.4	17.3	19.0	24.5	25.5	29.7	29.7	26.1	21.1	-	
NB17	436393	291987	33.0	34.9	30.5	31.2	30.8	30.2	15.8	19.2		26.4			28.0	22.7	-	
NB18	436525	291863	38.8	40.4	31.4	28.0	24.2	21.8	24.8	23.9	30.1	32.3	33.1	29.4	29.8	24.2	-	
NB20	436604	292202	29.2	30.9	29.3	26.5	23.1	24.7	19.4	21.1	24.7	25.9	28.8	21.4	25.4	20.6	-	
NB22	436810	292306	29.0	30.1	23.5	19.3	17.1	18.8	17.8	18.5	25.3	26.1	26.8	21.6	22.8	18.5	-	
NB23	436841	292280	38.0	38.5	29.8	25.6	22.1	24.5	28.0	25.1	28.0	29.0	33.1		29.2	23.7	-	
NB24	436812	292196	29.7	29.2	23.4	19.4	20.2	18.8	16.2	17.0	22.4	23.0	28.5	20.9	22.4	18.1	-	
NB25	435814	292274	40.4	34.7	27.4	26.0	22.8	22.0	26.3	25.0	30.7	30.3	33.7		29.0	23.5	-	
NB26	435759	292311	35.7	36.1	31.2	32.0	30.8	27.4	19.7	23.8	25.8	30.3	30.6	22.4	28.8	23.3	-	
NB27	435950	292113	43.6	41.2	34.1	35.7	35.8	31.7	32.0	30.8	35.1	36.0		31.2	35.2	28.5	-	
NB28	435893	292205	41.0	39.7	35.3	33.7	29.7	27.2	30.0	27.0	34.6	36.3	36.9	29.4	33.4	27.1	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.81)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
NB29	435626	292343	48.0	46.8	37.8	38.5	34.3	34.3	37.6	35.0	40.2	40.5	41.1	33.9	39.0	31.6	-	
NB30	435554	292378	46.0	45.6	26.6	37.8	31.4	30.8	35.2	33.6	40.4	40.2	40.7	35.0	36.9	29.9	-	
NB31	435146	284563	30.9	31.5	27.1	28.2	30.0	21.6	17.8	21.7	25.4	26.5	30.0	19.9	25.9	21.0	-	
NB35	439268	293457	24.7	23.4	20.8	19.5	16.4	15.5	11.8	15.6	19.2	21.9	24.0	16.4	19.1	15.5	-	
NB36	435217	285246	39.8	39.7	31.7	30.0	23.5	22.7	22.2	23.9	33.4	34.8	31.6	27.0	30.0	24.3	-	
NB37	435051	291594	37.5	40.3	31.7	31.7	30.5	27.0	26.5	26.7	31.9	32.4	35.1	28.5	31.6	25.6	-	
NB38	437198	290732	33.7	33.8	27.1	24.4	22.1	20.6	21.0	22.0	27.4	27.2	30.9	25.0	26.3	21.3	-	
NB41	435619	287042	34.8	38.0	26.9	29.7	30.2	28.3	18.7	23.9	28.2	30.0	32.1	23.0	28.6	23.2	-	
NB42	435655	287135		30.3	23.7	21.9	17.3	17.9	17.3	19.0	23.8	26.2	28.3	24.0	22.7	18.4	-	
NB43	436303	290796	30.0	28.2	24.7	22.5	17.7	17.3	14.3	17.4	20.7	22.9	26.9	20.5	21.9	17.8	-	
NB44	434298	290930	31.7	34.3	28.1	29.2	24.6	26.5	16.2	20.2	25.7	29.2	31.8	22.0	26.6	21.6	-	
NB45	435593	290728	39.9	38.4	32.3	29.3	24.7	25.9	24.1	22.8	32.1	35.2	35.3	30.3	30.9	25.0	-	
NB46	435135	290583	20.6	18.8	16.5	14.8	13.3	12.6	8.5	11.3	13.9	17.6	20.0	14.0	15.2	12.3	-	
NB47	435452	290087	24.5	23.2	20.2	18.5	13.7	11.5	9.5	10.5	14.7	17.3	17.2	13.8	16.2	13.1	-	
NB48	435066	290689	26.4	26.0	21.5	19.6	17.2	17.8	15.6	16.9	19.7	24.4	25.4	19.4	20.8	16.9	-	
NB49	435231	285236	34.8	34.3	29.3	27.1	23.9	23.1	22.1	24.0	28.5	30.3	30.9	24.7	27.7	22.5	-	
NB50	435201	285198							25.9	25.0	30.9	34.5	36.5	28.2	30.2	24.8	-	
NB51	435638	292357	32.6	30.9	29.0	27.9	22.4	22.8	17.4	20.9	25.0	26.5	30.0	23.6	25.7	20.9	-	
NB52	436147	290868	36.4	35.5	33.8	30.4	27.5	26.9	23.1	23.2	31.4	34.1	31.3	25.6	29.9	24.2	-	
NB53	434846	284736	32.2	33.9	30.0	28.3	24.0	20.7	18.9	21.1	26.1	29.8	29.0	25.2	26.6	21.5	-	
NB54	439049	292781	21.3	21.3	16.0	13.6	11.6	11.0	10.1	12.3	14.6	16.9	21.7	15.0	15.5	12.5	-	

- All erroneous data has been removed from the NO₂ diffusion tube dataset presented in Table B.1.
- Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22.
- Local bias adjustment factor used.
- National bias adjustment factor used.
- Where applicable, data has been distance corrected for relevant exposure in the final column.
- Nuneaton and Bedworth Borough Council confirm that all 2023 diffusion tube data has been uploaded to the Diffusion Tube Data Entry System.

Notes:

Exceedances of the NO₂ annual mean objective of 40µg/m³ are shown in **bold**.

NO₂ annual means exceeding 60µg/m³, indicating a potential exceedance of the NO₂ 1-hour mean objective are shown in **bold and underlined**.

See Appendix C for details on bias adjustment and annualisation.

Appendix C: Supporting Technical Information / Air Quality Monitoring Data QA/QC

New or Changed Sources Identified Within Nuneaton and Bedworth Borough Council During 2023

The following planning applications within the Nuneaton and Bedworth Borough Council area were received in 2023 and identified to have the potential to impact on air quality in the district. Table C.1 details a list of planning applications which were commented on by the Environmental Health Department in terms of air quality.

Table C.1 – Planning Applications with Air Quality Conditions in 2023

Date consultation received by Environmental Protection	Location	Details	Planning application number
13/01/2023	Part of Judkins, site 39a003 - Tuttle Hill, Nuneaton	Full planning application for the temporary use of site for open storage (Use Class B8) and associated development, for a period of up to 5 years, or until such time as the residential development for which it is allocated commences.	39352
14/03/2023	5 Bridge Street, Nuneaton, Warwickshire (Debenhams)	AQ report for mixed use residential and commercial. Refurbishment and part change of use Class E to Class C3 of existing building, with part demolition to create internal courtyard, part rooftop extension and erection of 3 storey associated building on adjacent loading area, with commercial retail Class E at ground floor and 63 No. apartments, open space, amenity and landscaping	39256
15/03/2023	"Site 98C003-Land off Lancing Road", Findon Close, Bulkington, Bedworth, Warwickshire	Outline application for residential development of up to 230 dwellings with access off Nuneaton Road and Bramcote Close (with all other matters reserved) Damage Costs calculation submitted	39005

06/04/2023	Watling Street	Erection of 34 dwellings and associated infrastructure	39512
09/05/2023	Bowling Green Lane, Bedworth	Outline planning application for the demolition of all existing structures on site, the development of up to 60,000 sq. m of commercial/industrial floorspace (Use Classes B2/B8/E(g)(ii and iii)) including ancillary office space (Use Class E(g)(i)) together with internal access roads, service yards, parking, landscaping, drainage and associated works with all matters reserved (appearance, landscaping, layout and scale) except for access to Bowling Green Lane and the widening of the carriageway of School Lane and associated works.	39611
09/05/2023	Bowling Green Lane, Bedworth	Outline planning application for the development of up to 93 dwellings (Use Class C3) and up to 70 bed care home (Use Class C2) including parking, open space, drainage and associated works with all matters reserved except for access (on to Bowling Green Lane)	39592
27/06/2023	Top Farm, Higham Lane, Nuneaton	Construction of a two storey secondary school building and sports hall, Multi Use Games Area, outdoor sports and recreation areas, parking, and associated infrastructure (within site identified for secondary school use by approved Outline Planning Application 035279)	39665
14/07/2023	Woodlands Road, Bedworth	Hybrid planning application for (i) full planning application for the demolition of the existing Woodlands Farmhouse and agricultural buildings and (ii) outline planning application for the erection of upto 150 residential dwellings (Use Class C3), and associated infrastructure, public open space and landscaping with all matters reserved except for access.	39720
13/12/2023	Coventry Road, Nuneaton	Outline planning application for up to 23,000m ³ of flexible Class E(g)(iii), B2 and B8	39979

		<p>floorspace including associated engineering and ground modelling works, landscaping, sustainable drainage system and associated works.</p>	
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Additional Air Quality Works Undertaken by Nuneaton and Bedworth Borough Council During 2023

Nuneaton and Bedworth Borough Council has not completed any additional works within the reporting year of 2023.

QA/QC of Diffusion Tube Monitoring

Diffusion tubes throughout 2023 were supplied and analysed by Gradko International using the 20% triethanolamine (TEA) in water preparation method. Gradko International is a UKAS accredited laboratory and participates in the AIR-PT Scheme (a continuation of the Workplace Analysis Scheme for Proficiency (WASP)) for NO₂ diffusion tube analysis and the Annual Field Inter-Comparison Exercise. Strict performance criteria are required to be met by participating laboratories, ensuring reported NO₂ data are of a high standard.

In the latest AIR-PT laboratory summary performance report, between September 2021 and October 2023, Gradko International scored 100% in all nine rounds reported (AR046, AR049, AR050, AR052, AR053, AR055, AR056, AR058 and AR059). The percentage score reflects the results deemed to be satisfactory based upon a z-score of $\leq \pm 2$. Gradko International also follows the procedures set out in the Harmonisation Practical Guidance.

The precision of the current 21 local authority co-location studies in 2023 detailed within the national bias adjustment factor spreadsheet (version 03/24) was rated as 'good' (tubes are considered to have "good" precision where the coefficient of variation of duplicate or triplicate diffusion tubes for eight or more periods during the year is less than 20%).

Further information on the precision summary results can be found on the LAQM website.

All diffusion tube changeovers occurred within two days of the dates of the 2023 Diffusion Tube Monitoring Calendar.

All results in Table A.2 have been bias adjusted using the national adjustment factor; further details are described below.

Diffusion Tube Annualisation

As per LAQM.TG(22), annualisation is required for any site which has a data capture of less than 75%, but greater than 25%. Annualisation was therefore required to be completed for three diffusion tube monitoring sites. The four closest continuous monitoring background locations which were selected to annualise the data were:

- Birmingham Ladywood
- Coventry Allesley
- Leamington Spa
- West Bromwich Kenrick Park

These sites have a data capture of >85% and therefore could be used for annualisation.

Table C.2 presents the annualisation summary and is taken directly from the Diffusion Tube Data Processing Tool.

Table C.2 – Annualisation Summary (concentrations presented in $\mu\text{g}/\text{m}^3$)

Site ID	Annualisation Factor - Birmingham Ladywood	Annualisation Factor Coventry Allesley	Annualisation Factor Leamington Spa	Annualisation Factor West Bromwich Kenrick Park	Average Annualisation Factor	Raw Data Annual Mean	Annualised Annual Mean
NB50	0.9977	1.0365	1.0353	0.9909	1.0151	30.2	30.6

Diffusion Tube Bias Adjustment Factors

The diffusion tube data presented within the 2024 ASR have been corrected for bias using an adjustment factor. Bias represents the overall tendency of the diffusion tubes to under or over-read relative to the reference chemiluminescence analyser. LAQM.TG22 provides guidance with regard to the application of a bias adjustment factor to correct diffusion tube monitoring. Triplicate co-location studies can be used to determine a local bias factor based on the comparison of diffusion tube results with data taken from NO_x/NO_2 continuous analysers. Alternatively, the national database of diffusion tube co-location surveys provides bias factors for the relevant laboratory and preparation method.

Nuneaton and Bedworth Borough Council have applied a national bias adjustment factor of 0.81 to the 2023 monitoring data. A summary of bias adjustment factors used by Nuneaton and Bedworth Borough Council over the past five years is presented in Table C.3. A screenshot of the National Bias Adjustment Factor Spreadsheet (v03/24) is also presented below.

Table C.3 – Bias Adjustment Factor

Monitoring Year	Local or National	If National, Version of National Spreadsheet	Adjustment Factor
2023	National	03/24	0.81
2022	National	03/23	0.83
2021	National	03/22	0.84
2020	National	06/21	0.81
2019	National	06/20	0.91

National Diffusion Tube Bias Adjustment Factor Spreadsheet							Spreadsheet Version Number: 03/24				
Follow the steps below in the correct order to show the results of relevant co-location studies Data only apply to tubes exposed monthly and are not suitable for correcting individual short-term monitoring periods Whenever presenting adjusted data, you should state the adjustment factor used and the version of the spreadsheet This spreadsheet will be updated every few months: the factors may therefore be subject to change. This should not discourage their immediate use.							This spreadsheet will be updated at the end of June 2024 LAQM Helpdesk Website				
The LAQM Helpdesk is operated on behalf of Defra and the Devolved Administrations by Bureau Veritas, in conjunction with contract partners AECOM and the National Physical Laboratory.							Spreadsheet maintained by the National Physical Laboratory. Original compiled by Air Quality Consultants Ltd.				
Step 1:		Step 2:	Step 3:	Step 4:							
Select the Laboratory that Analyses Your Tubes from the Drop-Down List		Select a Preparation Method from the Drop-Down List	Select a Year from the Drop-Down List	Where there is only one study for a chosen combination, you should use the adjustment factor shown with caution. Where there is more than one study, use the overall factor ² shown in blue at the foot of the final column.							
If a laboratory is not shown, we have no data for this laboratory.		If a preparation method is not shown, we have no data for this method at this laboratory.	If a year is not shown, we have no data ² .	If you have your own co-location study then see footnote ³ . If uncertain what to do then contact the Local Air Quality Management Helpdesk at LAQMHelpdesk@bureauveritas.com or 0800 0327953							
Analysed By ¹	Method ² <small>As of the year of location, change (All) from the year of test.</small>	Year ³ <small>To the year of location, change (All)</small>	Site Type	Local Authority	Length of Study (months)	Diffusion Tube Mean Conc. (Dm) (µg/m ³)	Automatic Monitor Mean Conc. (Cm) (µg/m ³)	Bias (B)	Tube Precision ⁴	Bias Adjustment Factor (A) (Cm/Dm)	
Gradko	20% TEA in water	2023	R	Monmouthshire County Council	11	33	26	26.5%	G	0.79	
Gradko	20% TEA in water	2023	R	Blackburn With Darwen Bc	12	23	16	43.8%	G	0.70	
Gradko	20% TEA in water	2023	R	Lancaster City Council	10	35	27	28.6%	G	0.78	
Gradko	20% TEA in water	2023	R	Eastleigh Borough Council	12	33	26	26.4%	G	0.79	
Gradko	20% TEA in water	2023	R	Eastleigh Borough Council	12	22	19	12.5%	G	0.89	
Gradko	20% TEA in water	2023	R	Plymouth City Council	12	35	26	38.3%	S	0.72	
Gradko	20% TEA in water	2023	R	Plymouth City Council	10	39	31	24.2%	S	0.80	
Gradko	20% TEA in water	2023	UC	Belfast City Council	10	26	19	38.3%	G	0.72	
Gradko	20% TEA in water	2023	R	Cheshire West And Chester	12	35	32	10.0%	G	0.91	
Gradko	20% TEA in water	2023	R	Cheshire West And Chester	10	32	28	14.6%	G	0.87	
Gradko	20% TEA in water	2023	R	Dudley Mbc	12	27	23	17.1%	G	0.85	
Gradko	20% TEA in water	2023	UB	Dudley Mbc	12	19	13	45.4%	G	0.69	
Gradko	20% TEA in water	2023	R	Dudley Mbc	12	40	37	7.7%	G	0.93	
Gradko	20% TEA in water	2023	R	Gateshead Council	12	23	20	17.7%	G	0.85	
Gradko	20% TEA in water	2023	R	Gateshead Council	11	23	18	26.9%	G	0.79	
Gradko	20% TEA in water	2023	R	Gateshead Council	12	27	22	20.7%	G	0.83	
Gradko	20% TEA in water	2023	R	Gateshead Council	12	29	23	25.9%	G	0.79	
Gradko	20% TEA in water	2023	R	Gateshead Council	12	30	33	-7.8%	G	1.08	
Gradko	20% TEA in water	2023	KS	Magylebone Road Intercomparison	11	45	38	20.3%	G	0.83	
Gradko	20% TEA in water	2023	B	South Holland District Council	10	8	7	12.4%	G	0.89	
Gradko	20% TEA in water	2023	R	Worcestershire	12	12	11	17.4%	G	0.85	
Gradko	20% TEA in water	2023	R	Aids And North Down Borough Council	12	33	21	80.2%	G	0.62	
Gradko	20% TEA in water	2023	R	Lisburn & Castlereagh City Council	11	24	20	22.1%	G	0.82	
Overall Factor² (23 studies)							Use		0.81		

NO₂ Fall-off with Distance from the Road

Wherever possible, monitoring locations are representative of exposure. However, where this is not possible, the NO₂ concentration at the nearest location relevant for exposure has been estimated using the Diffusion Tube Data Processing Tool/NO₂ fall-off with distance calculator available on the LAQM Support website. Where appropriate, non-automatic annual mean NO₂ concentrations corrected for distance are presented in Table B.1.

No diffusion tube NO₂ monitoring locations within Nuneaton and Bedworth required distance correction during 2023.

Appendix D: Map(s) of Monitoring Locations and AQMAs

Figure D.1 – Map of Non-Automatic Monitoring Site – Leicester Road Gyratory AQMA (AQMA 1)

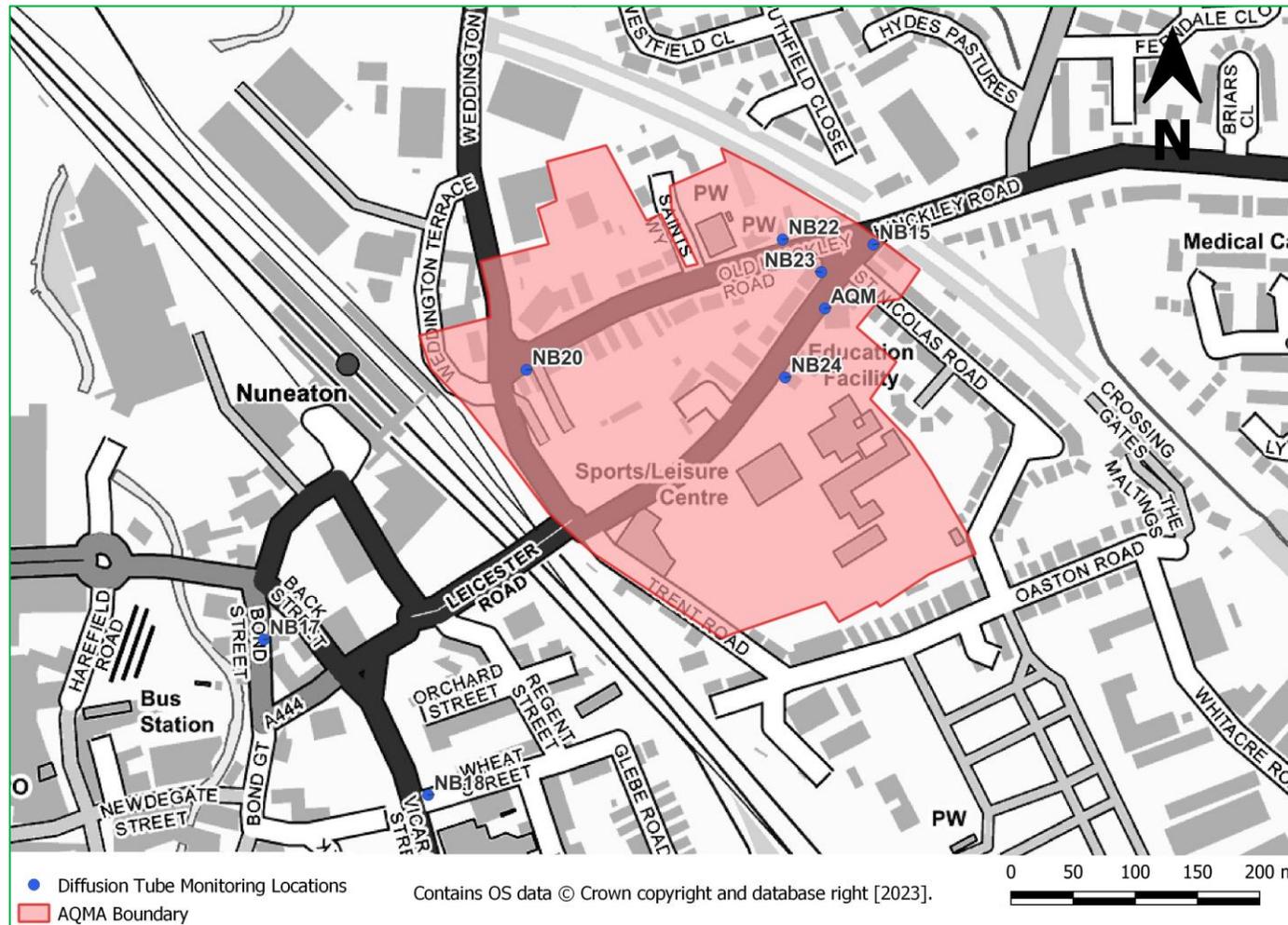


Figure D.2 – Map of Non-Automatic Monitoring Site – Midland Road / Corporation Street AQMA (AQMA 2)

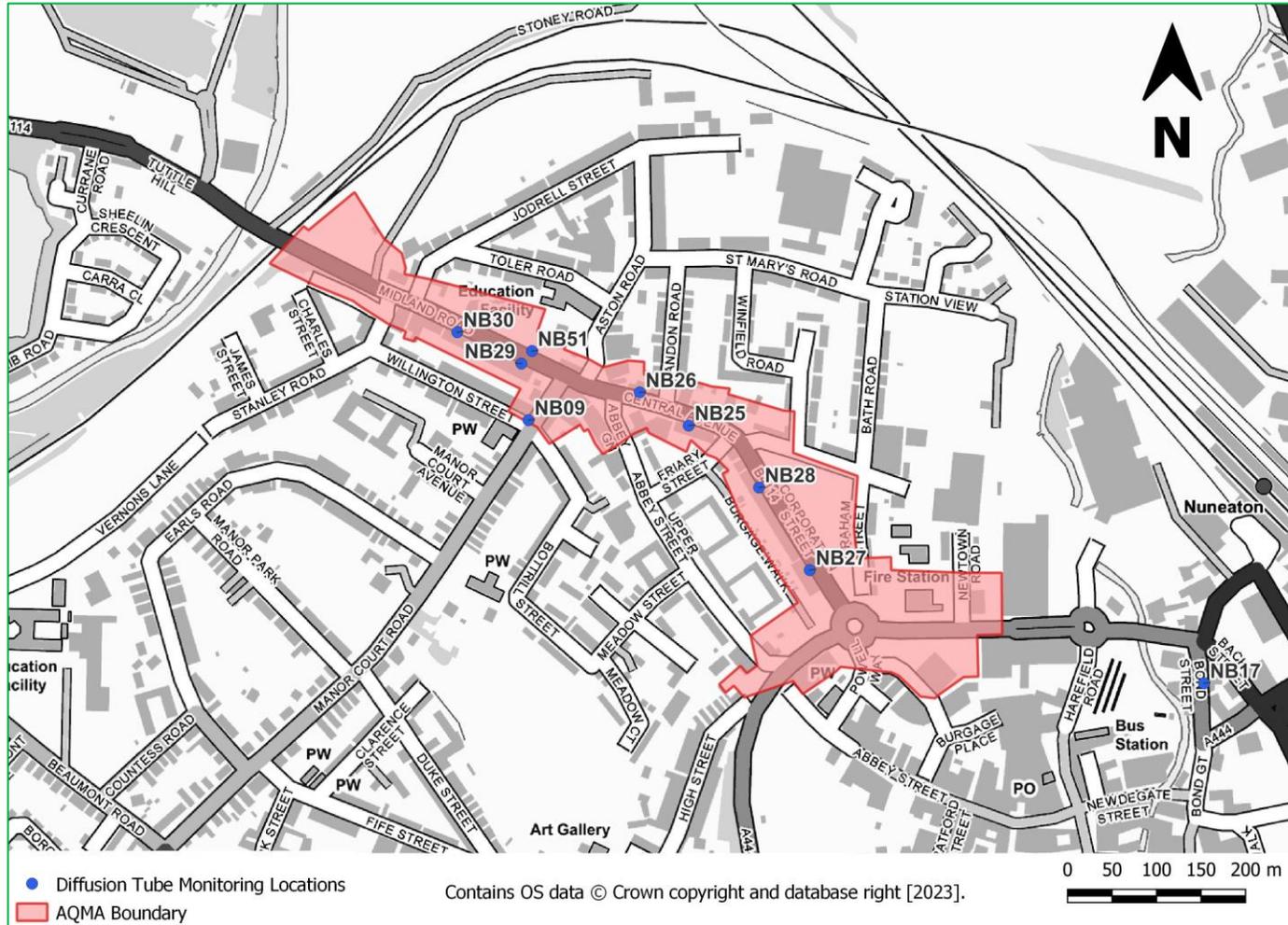


Figure D.3 – Map of Non-Automatic Monitoring Site – South Nuneaton

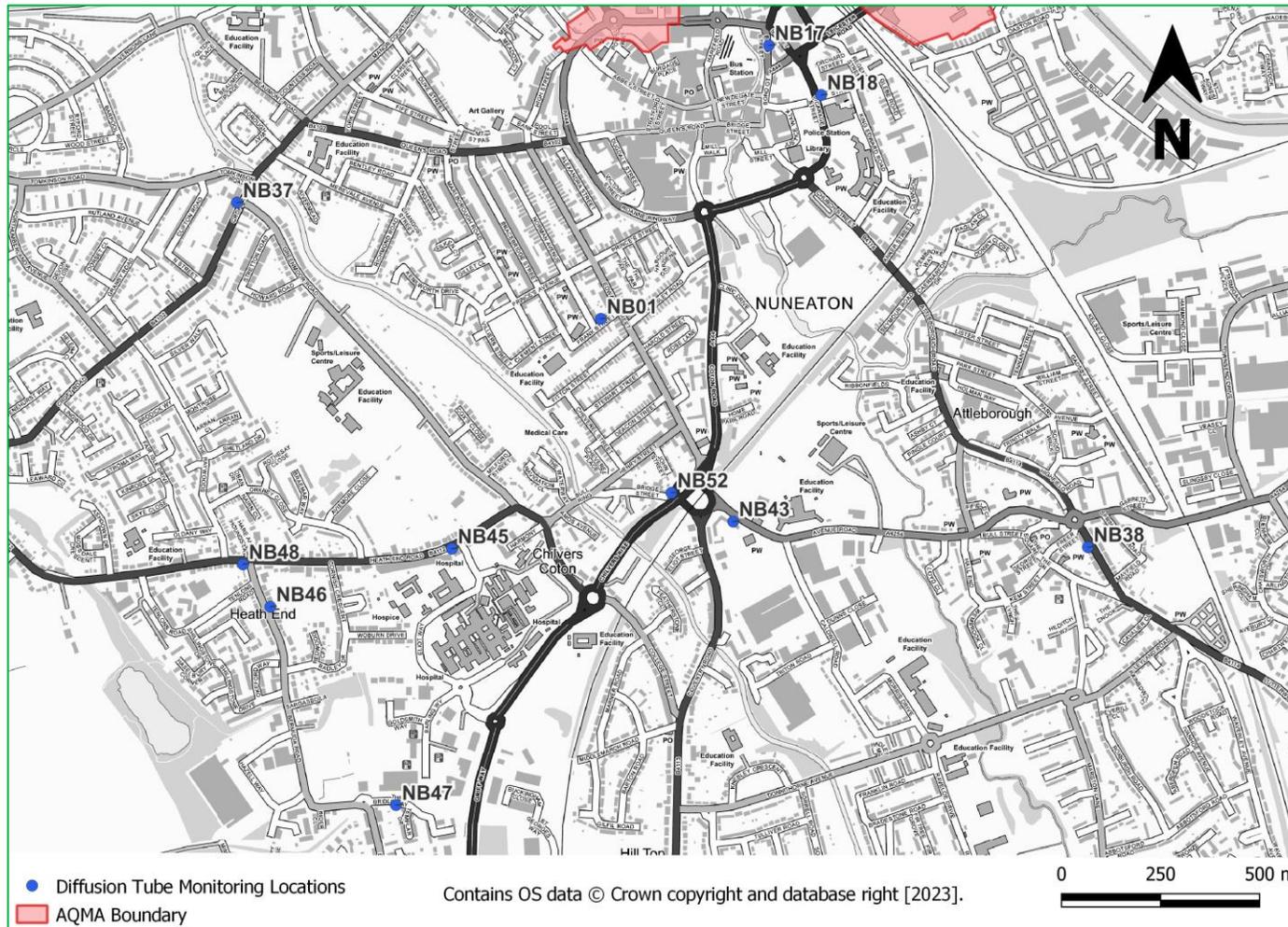


Figure D.4 – Map of Non-Automatic Monitoring Site – North Nuneaton

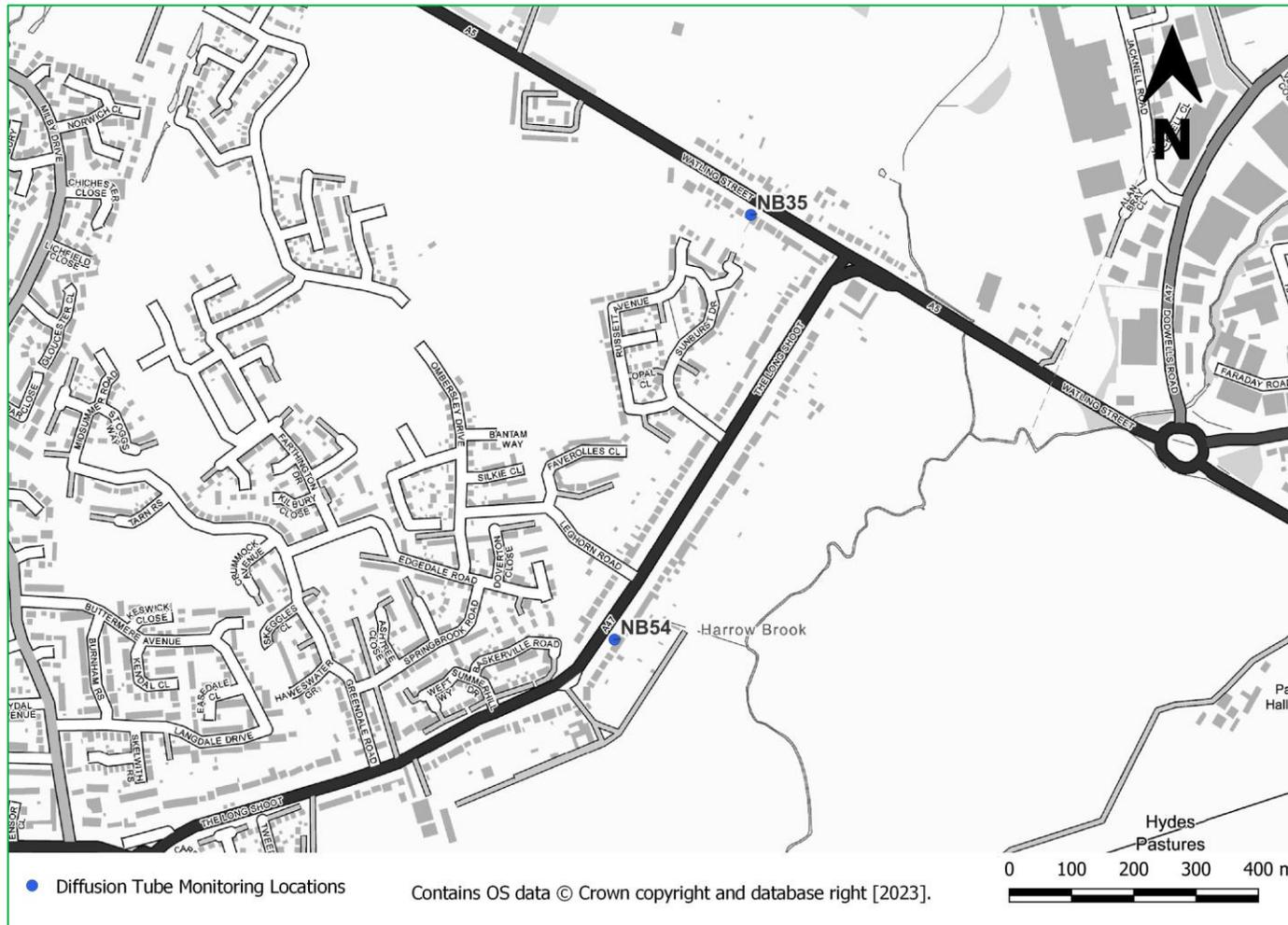
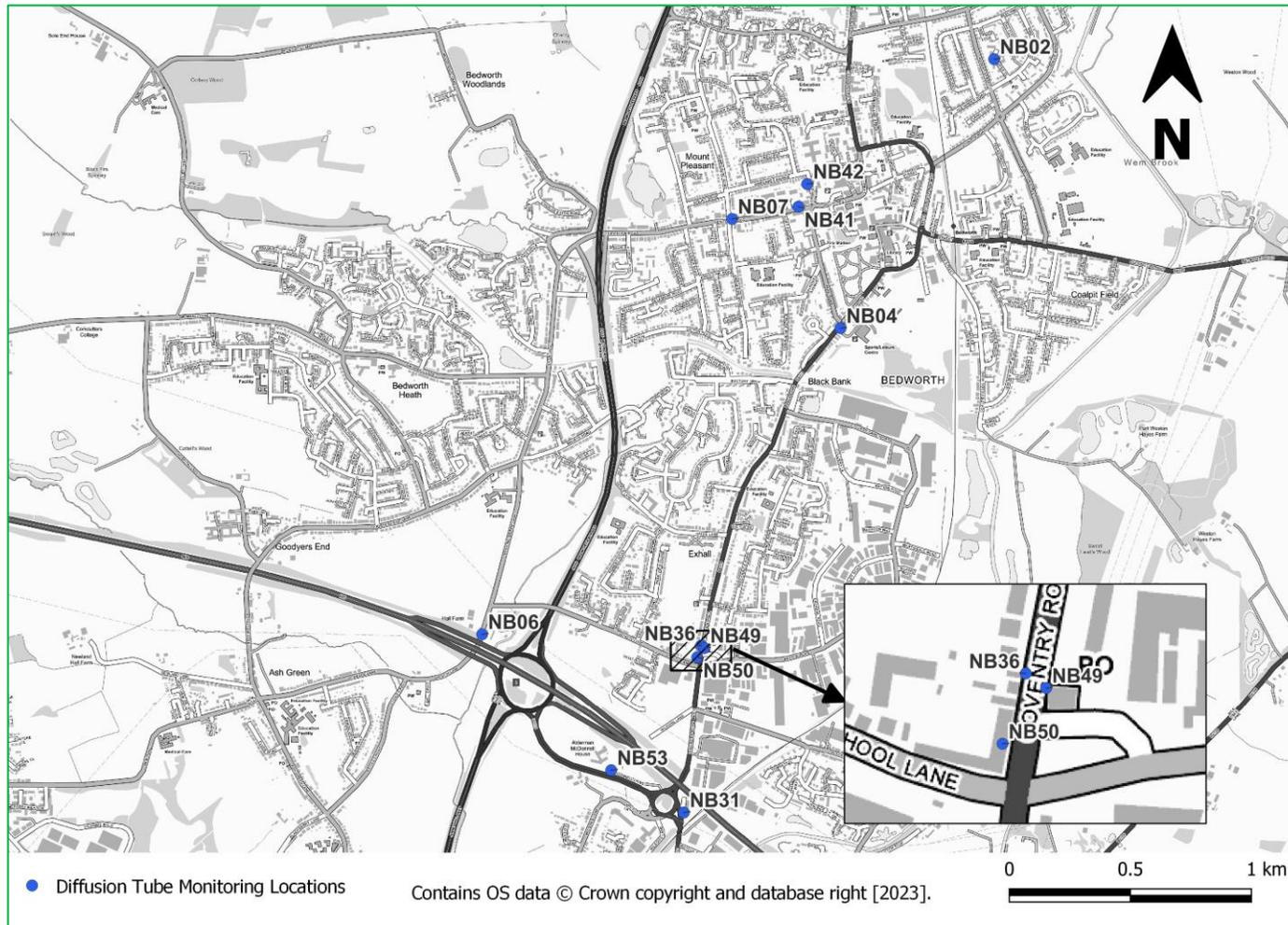


Figure D.5 – Map of Non-Automatic Monitoring Site – Bedworth



Appendix E: Summary of Air Quality Objectives in England

Table E.1 – Air Quality Objectives in England¹¹

Pollutant	Air Quality Objective: Concentration	Air Quality Objective: Measured as
Nitrogen Dioxide (NO ₂)	200µg/m ³ not to be exceeded more than 18 times a year	1-hour mean
Nitrogen Dioxide (NO ₂)	40µg/m ³	Annual mean
Particulate Matter (PM ₁₀)	50µg/m ³ , not to be exceeded more than 35 times a year	24-hour mean
Particulate Matter (PM ₁₀)	40µg/m ³	Annual mean
Sulphur Dioxide (SO ₂)	350µg/m ³ , not to be exceeded more than 24 times a year	1-hour mean
Sulphur Dioxide (SO ₂)	125µg/m ³ , not to be exceeded more than 3 times a year	24-hour mean
Sulphur Dioxide (SO ₂)	266µg/m ³ , not to be exceeded more than 35 times a year	15-minute mean

¹¹ The units are in microgrammes of pollutant per cubic metre of air (µg/m³).

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Annual Status Report
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges – Air quality screening tool produced by National Highways
EST	Energy Savings Trust
EU	European Union
EV	Electric Vehicle
FDMS	Filter Dynamics Measurement System
LAQM	Local Air Quality Management
LEV	Low Emission Vehicle
LTP	Local Transport Plan
NBBC	Nuneaton and Bedworth Borough Council
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
OLEV	Office for Low Emission Vehicles
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
QA/QC	Quality Assurance and Quality Control
SO ₂	Sulphur Dioxide
SPD	Supplementary Planning Document
TNP	Transforming Nuneaton Programme

Abbreviation	Description
WCC	Warwickshire County Council

References

- Air Quality Action Plan. April 2022. Published by Nuneaton and Bedworth Borough Council.
- Air Quality Strategy – Framework for Local Authority Delivery. August 2023. Published by Defra.
- Chemical hazards and poisons report: Issue 28. June 2022. Published by UK Health Security Agency
- Environmental Improvement Plan 2023. January 2023. Published by Defra.
- Local Air Quality Management Technical Guidance LAQM.TG22. August 2022. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Local Air Quality Management Policy Guidance LAQM.PG22. August 2022. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Nuneaton and Bedworth Borough Council 2023 ASR.
- Public Health Outcomes Framework tool. 2023. Public Health England. Available: [Public Health Outcomes Framework - Data - OHID \(phe.org.uk\)](https://publichealthoutcomesframework.org.uk/)
- Supplementary Planning Document: Air Quality, 2020. Published by Nuneaton and Bedworth Borough Council.
- The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy. July 2018. Published by the Department for Transport.

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Annual Status Report Appraisal Report

The Annual Status Report sets out new information on air quality obtained by Nuneaton and Bedworth Council (NBC) as part of the Review & Assessment process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

NBC currently have two AQMAs within their jurisdiction:

- AQMA 1 (Leicester Road Gyratory, Nuneaton), declared in 2007 for exceedances in the annual mean NO₂ objective; and
- AQMA 2 (Midland Road/Corporation Street, Nuneaton), declared in 2009 for exceedances in the annual mean NO₂ objective.

Concentrations within AQMA 1 have been below the objective for 10 years and have not exceeded 10% of the objective in (at least) the past 5 years. It is acknowledged that the Council intend to revoke this AQMA but are yet to do so due to housing developments within the area. However, following a strengthened approach in 2023, it is now recommended that the revocation of this AQMA progresses in the upcoming reporting year unless there is sufficient evidence that the proposed development(s) will cause significant impacts on air quality. Monitoring within the area of the proposed development should continue following this revocation to determine if a new AQMA should be declared. The Council should refer to the Local Air Quality Management Helpdesk with any queries.

The Council have stated that a review of AQMA 2 will be undertaken in the upcoming reporting year to determine whether revocation is necessary. As concentrations within this AQMA have not exceeded the objective since 2019, and concentrations are not within 10% of the objective, this review is supported.

The revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objective as evidenced through monitoring. Where there have been no exceedances for the past five years, local authorities must proceed with plans to revoke the AQMA. The LAQM Technical Guidance 2022 is clear in this respect:

"There should not be any declared AQMAs for which compliance with the relevant objective has been achieved for a consecutive five-year period." (Point 3.57, page 50).

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Please be aware that unless a likely exceedance has been identified in the area, Defra will not appraise AQAPs for AQMAs that have been in compliance for five years. Local Authorities will instead be advised to revoke the AQMA.

AQMAs should identify areas where air quality objectives are not being met or are likely to be at risk of not meeting them. Keeping AQMAs in place longer than required risks diluting their meaning and impacting public trust in LAQM.

Local authorities that do not have an AQMA should continue to monitor for exceedances and should still have a local air quality strategy in place to ensure air quality remains a high-profile issue, thereby enabling a quick response should there be any deterioration in condition. See LAQM Statutory Policy Guidance 2022 for more information.

NBC did not undertake any automatic monitoring in 2022. Monitoring was undertaken at 38 passive monitoring sites within Borough in 2022, including 6 sites within AQMA 1 and 8 sites in AQMA 2. There were no exceedances of the annual mean NO₂ objective in 2022, and no site recorded a concentration within 10% of the objective. A maximum concentration of 34.5 µg/m³ was recorded at NB29 and NB30 within AQMA 2. This is a decrease on concentrations recorded in 2021 and is well below the concentrations recorded in 2019 (pre-COVID). Within AQMA 1, a maximum concentration of 26.2 µg/m³ was recorded at site NB23.

An additional monitoring site has been installed to assess the impacts of proposed housing developments near AQMA 1. Site AQM was installed in November 2022, and therefore does not have sufficient data to be present within this report. The Council should include monitoring results from this site in future ASRs and provide discussion on the significance of the results with relation to AQMA 1.

QA/QC procedures have been discussed in full. No annualisation or distance correction calculations were required for any monitoring site. A national bias adjustment factor of 0.83 has been used for adjustment of monitoring data. This is due to no available automatic monitoring site, and therefore no local bias adjustment factor could be calculated.

On the basis of the evidence provided by the local authority the conclusions reached in the report are **accepted** for all sources and pollutants, on the provision that the grammatical and formatting errors in the report are corrected prior to publication on the council's website. ASRs are public facing documents that serve to keep local communities informed of the steps being taken by their local authority to improve air quality, and as such it is important that they are accessible and easy

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to read. Following the completion of this report, Nuneaton and Bedworth Borough Council should submit an Annual Status Report in 2024.

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Commentary

The report is well structured, detailed, and provides the information specified in the Guidance.

The following comments are designed to help inform future reports:

1. It has been noted that AQMA 1 has been compliant for 10 years. Following a strengthened approach in 2023, it is now recommended that this AQMA is revoked in the upcoming year. Monitoring should continue at site AQM to highlight the possible impacts of housing development(s) surrounding the AQMA. Where possible, details of the housing development(s) and any submitted air quality assessments could be included in future ASRs to support the decision to revoke.
2. Graphs highlighting the trends of monitored concentrations at diffusion tube sites have been provided. These are clear and well-formatted. It may be useful to include a line highlighting the annual mean objective for easy comparison.
3. Excellent figures have been provided demonstrating the locations of AQMAs and monitoring sites. Monitoring sites are easy to distinguish, and the labels are clear to read. The Council should continue to produce figures of the same standard in future ASRs.
4. The Council have addressed the comments from the previous ASR appraisal. This demonstrates good practice, and the Council should continue to address all future appraisal comments in future reports.
5. It should be confirmed within the report, underneath Table B.1, whether the diffusion tube data has been uploaded into the DTDES.
6. Overall, the report is well structured and provides a good amount of detail. The Council is commended for their hard work in improving air quality across the Borough.

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority either in completing the Annual Status Report adequately (if required) or in carrying out future Review & Assessment work.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Government, Scottish Government or DOE.

For any other queries please contact the Local Air Quality Management Helpdesk:

Telephone: 0800 0327 953

Email: LAQMHelpdesk@bureauveritas.com

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Notice for 2023

Changes to the Local Air Quality Management Framework

Through the Environment Act 2021 and updated Local Air Quality Management Statutory Policy Guidance 2022, the Local Air Quality Management (LAQM) framework has been considerably strengthened. This page highlights some of the changes for delivery to help you prioritise action for improved air quality:

1. Strengthened Criteria for Air Quality Action Plans (AQAPs)

Where a Local Authority is not meeting air quality objectives, they must create an AQAP setting out their intentions to improve air quality in the area. Without current action plans in place, Local Authorities risk negatively impacting their communities by not proactively working to reduce air pollution in the area.

The requirements and guidance around AQAPs were recently strengthened under the Environment Act 2021 and revised LAQM Statutory policy guidance, which Local Authorities must have regard to. The key criteria for action plans are that they:

- set out the measures they will take to secure the achievement, and maintenance, of air quality standards and objectives
- specify a date by which each measure will be carried out
- are revised no later than every five years

2. New Escalation Process for Reporting

Government is committed to increasing transparency by requiring timely and accurate publication of Annual Status Reports (ASRs) and AQAPs by local authorities, as set out in the [Environmental Improvement Plan 2023](#). These documents are public-facing and serve to keep local communities informed of the steps being taken by their local authority to improve air quality.

To ensure ASRs and AQAPs are delivered on time, Defra has introduced a new reminder and warning letter system for Local Authorities. This system was set out in the [LAQM Statutory Policy Guidance 2022](#) and started to apply from 30 June 2023.

Local Authority:	Nuneaton and Bedworth Borough Council
Reference:	ASR23-1863
Date of issue	August 2023

If reporting requirements continue to be missed, the matter can be escalated to a Section 85 Secretary of State direction to the relevant Local Authority Chief Executive specifying action. You are therefore advised to ensure all statutory reporting duties for LAQM are met on time.

3. Public Bodies Required to Contribute to Action Plans

The Environment Act 2021 amended the Environment Act 1995 to increase the number of public bodies that have a duty to co-operate with Local Authorities for LAQM. Air quality partners are certain other public bodies that a Local Authority identifies as having responsibility for a source of emissions contributing to an exceedance of local air quality objectives. This could be a neighbouring authority, National Highways, or the Environment Agency. Once identified, there is a statutory requirement for such public bodies to engage and to contribute actions they will take to secure achievement of the local air quality objective and to maintain achievement thereafter.

All tiers of local Government are also now required by law to collaborate to address exceedances of Air Quality Objectives. County councils, the Mayor of London and combined authorities have similar duties to air quality partners. The difference is that, when requested, they must contribute to an action plan being prepared by a Local Authority, regardless of whether the local authority has identified them as being responsible for a source of emissions.

Under the new legislation, you may choose to request the support of another public body in the development of an AQAP and the same may be requested of your organisation.

Please refer to the LAQM Statutory Policy Guidance 2022 for more information. Should you require further assistance, please contact the LAQM Helpdesk: <https://laqm.defra.gov.uk/air-quality/featured/england-exc-london-policy-guidance/>

Web: <http://laqm.defra.gov.uk/helpdesks.html>

FAQs: <http://laqm.defra.gov.uk/laqm-faqs/>

Tel: 0800 032 7953

Email: laqmhlpdesk@uk.bureauveritas.com

The Air Quality Hub also provides free online information and is a knowledge sharing resource for local authority air quality professionals: <https://www.airqualityhub.co.uk/>

Local Authority:	Nuneaton and Bedworth Borough Council
Reference:	ASR23-1863
Date of issue	August 2023

Appraisal Response Comment Form

Contact Name:	
Contact Telephone number:	
Contact email address:	UKLAQMAppraisals@aecom.com

Comments on appraisal/Further information:

Local Authority:	Nuneaton and Bedworth Borough Council
Reference:	ASR24-2366
Date of issue	August 2024

Annual Status Report Appraisal Report

The Annual Status Report sets out new information on air quality obtained by Nuneaton and Bedworth Council (NBC) as part of the Review & Assessment process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

NBC currently have two AQMAs within their jurisdiction; AQMA 1 (Leicester Road Gyratory, Nuneaton), declared in 2007 for exceedances in the annual mean NO₂ objective; and AQMA 2 (Midland Road/Corporation Street, Nuneaton), declared in 2009 for exceedances in the annual mean NO₂ objective.

NO₂ concentrations measured in the Leicester Road Gyratory AQMA (AQMA 1) have been below the annual mean NO₂ objective (AQO) value of 40 µg/m³ for more than 10 years. Revocation of AQMA 1 was recommended by Defra upon review of the 2018 ASR, however it was agreed that this should be delayed as housing developments in close proximity to the AQMA could have significant impacts on air quality. The recommendation to revoke AQMA 1, was taken to NBC's Overview and Scrutiny Panel in February 2024. NBC intend to continue the revocation process in September 2024.

Exceedances of the annual mean NO₂ objective were measured prior to 2020 within the existing Midland Road / Corporation Street AQMA (AQMA 2). Measured concentrations for the last four years of monitoring have been below the NO₂ AQO objective value of 40 µg/m³. However, considering the first year of compliance was achieved in 2020 which was under the impact of COVID-19 lockdown, NBC have taken the approach to review the AQMA 2 revocation in the 2025 ASR.

NBC did not undertake any automatic monitoring in 2023. Monitoring was undertaken at 39 passive monitoring sites within Borough in 2023, including 6 sites within AQMA 1 and 8 sites in AQMA 2. There were no exceedances of the annual mean NO₂ objective in 2023, and no site recorded a concentration within 10% of the objective. A maximum concentration of 31.1 µg/m³ was recorded at NB29 within AQMA 2. Across the majority of diffusion tubes sites, a decrease can be seen from 2021 to 2023. Within AQMA 1, a maximum concentration of 23.8 µg/m³ was recorded at site NB23.

QA/QC procedures have been discussed in full. The laboratory Gradko and analysis method 20% TEA in water used have been clearly stated. NBC have also included details stating that all diffusion tube changeovers occurred within two days of the dates of the 2023 Diffusion Tube

Local Authority:	Nuneaton and Bedworth Borough Council
Reference:	ASR24-2366
Date of issue	August 2024

Monitoring Calendar. Annualisation was required at one diffusion tube monitoring site, NB50, and the following continuous background monitoring sites were used for the annualisation; Birmingham Ladywood, Coventry Allesley, Leamington Spa and West Bromwich Kenrick Park. A national bias adjustment factor of 0.81 has been used for adjustment of monitoring data. No diffusion tube NO₂ monitoring locations within Nuneaton and Bedworth required distance correction during 2023.

On the basis of the evidence provided by the local authority the conclusions reached in the report are **accepted** for all sources and pollutants. Following the completion of this report, Nuneaton and Bedworth Borough Council should submit an Annual Status Report in 2025.

Local Authority:	Nuneaton and Bedworth Borough Council
Reference:	ASR24-2366
Date of issue	August 2024

Commentary

The report is well structured, detailed, and provides the information specified in the Guidance.

The following comments are designed to help inform future reports:

1. Table 2.1 in the Excel ASR table spreadsheet is not filled in completely. This needs to match what is in Table 2.1 in the ASR report. The Council should amend this.
2. The Council should continue with the revocation process of AQMA 1 and report progress in the 2025 ASR. Monitoring should continue at site AQM to highlight the possible impacts of housing development(s) surrounding the AQMA. Where possible, details of the housing development(s) and any submitted air quality assessments could be included in future ASRs to support the decision to revoke the AQMA.
3. Graphs highlighting the trends of monitored concentrations at diffusion tube sites have been provided. These are clear and well-formatted. It may be useful to include a line highlighting the annual mean objective for an easy comparison.
4. Clear figures have been provided demonstrating the locations of AQMAs and monitoring sites. Monitoring sites are easy to distinguish, and the labels are clear to read. The Council should continue the good work for future ASRs.
5. The Council have addressed the comments from the previous ASR appraisal. This demonstrates good practice, and the Council should continue to address all future appraisal comments in future reports.
6. Overall, the report is well structured and provides a good amount of detail. The Council is commended for their hard work in improving air quality across the Borough.

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority either in completing the Annual Status Report adequately (if required) or in carrying out future Review & Assessment work.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Government, Scottish Government or DOE.

Local Authority:	Nuneaton and Bedworth Borough Council
Reference:	ASR24-2366
Date of issue	August 2024

For any other queries please contact the Local Air Quality Management Helpdesk:

Telephone: 0800 0327 953

Email: LAQMHelpdesk@bureauveritas.com

The [Air Quality Hub](#) is now run by Defra, it is a free online information and knowledge sharing resource for local authority air quality professionals. Please consider onboarding on the Air Quality Hub to access a multitude of air quality resources and be kept up to date with local authority air quality activity and air quality news.

Local Authority:	Nuneaton and Bedworth Borough Council
Reference:	ASR24-2366
Date of issue	August 2024

Appraisal Response Comment Form

Contact Name:	Sara Warne
Contact Telephone number:	024 7637 6479
Contact email address:	Sara.warne@nuneatonandbedworth.gov.uk UKLAQMAappraisals@aecom.com

Comments on appraisal/Further information:

Paragraph 7 of the appraisal report and Point 1 of the Commentary state that:

This ASR report did not get sign off from a Director of Public Health. Although, this isn't a requirement, it is recommended that NBC includes this in future reports.

However, NBBCs 2024 ASR was signed off by Shade Agboola the Director of Public Health for Warwickshire and this is stated on **page vi** of the submitted report as detailed below:

This ASR has been signed off by a Director of Public Health for Warwickshire County Council – Dr Shade Agboola.

Can the appraisal be updated accordingly.

The appraisal letter has been updated accordingly.

Cabinet

Report Summary Sheet

Date: 6th November 2024

Subject: Housing Strategy 2024-34

Portfolio: Housing

From: Assistant Director- Strategic Housing

Summary: Housing has an integral part to play in our Borough's ambitions, as set out in our Corporate Strategy.

Having a place to live is a basic human need and our vision is to ensure that all residents have access to affordable and warm housing in a safe and sustainable community leading to better health and well-being outcomes.

Recommendations:

1. That the Housing Strategy 2024-34 be adopted by Cabinet as a document informing residents, stakeholders and interested parties on the housing needs for our Borough.

Options:

1. Adopt the Housing Strategy 2024-34

2. Do not adopt the Housing Strategy 2024-34, instead require further work to be concluded for inclusion and /or amendments.
3. Do not adopt NBBC having a Housing Strategy at all.

Reasons:

1. Though there is no statutory requirement to have a Housing Strategy, the Council recognises the importance to the Borough of having a document that sets out the housing needs of the Borough to enable developers, stakeholders and partners to better inform their services in accordance with the Boroughs needs.

Consultation undertaken with Members/Officers/Stakeholders

Portfolio Holder- Housing
 Housing and Communities OSP 26/09/24
 NBBC Strategic Directors
 NBBC Assistant Directors
 Stakeholders as detailed in the appendment to the Strategy at APPENDIX B

Subject to call-in: Yes

Ward relevance: Borough wide

Forward plan: Yes

Building a Better Borough Aim: 1

Building a Better Borough Priority: Aim 1, Priorities 1 and 2

Relevant statutes or policy:

Housing Act 1996
 Housing Act 2004

Equalities Implications:

EIA conducted by Equality and Safeguarding Officer and attached at APPENDIX B

Human resources implications: None

Financial implications: None

Health Inequalities Implications:

HEAT completed and attached at APPENDIX C

Section 17 Crime & Disorder Implications: None

Risk management implications: None

Environmental implications: Compliance with Housing Act legislation and Environmental Act 2021, including Net Zero ambitions will support the Agenda for improving the Environment within our new build and existing communities.

Legal implications: None

N/A

Contact details:

Jane Grant Assistant Director- Strategic Housing 02476376483

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Cabinet

Date: 6th November 2024

From: Assistant Director- Strategic Housing

Subject: Housing Strategy 2024-34

Portfolio: Housing

Building a Better Borough Aim: 1

Building a Better Borough Priority: of Aim one priorities 1 and 2

1. Purpose of Report

1.1 Housing has an integral part to play in our Borough's ambitions, as set out in our Corporate Strategy. Having a place to live is a basic human need and our vision is to ensure that all residents have access to affordable and warm housing in a safe and sustainable community leading to better health and well-being.

1.2 The Housing Strategy 2024-34, at **APPENDIX A**, sets out the housing needs and housing related needs of the Borough, along with the Councils commitment to responding to those needs, working with our partners to deliver on our ambitions for the Borough.

2. Recommendations

2.1 That the Housing Strategy 2024-34 be adopted by Cabinet as a document informing residents, stakeholders and interested parties on the housing needs for our Borough.

3 Background

3.1 There is no longer a statutory duty on Local Authorities to produce a Housing Strategy. Nuneaton and Bedworth Borough Council have continued to do so because of the value placed on having a

mechanism to inform residents, partners and stakeholders of the housing and associated needs in the borough, along with explaining the landscape that perpetuates those needs.

4. Body of Report

4.2 The principal purpose of the Housing Strategy is to present stakeholders and interested parties with the housing need and associated needs in our Borough.

4.3 The delivery of suitable accommodation for all cannot be achieved by the Council alone, and the many partners referenced in the Strategy play a vital role in supporting our ambition of “seeking to provide the right houses, with the right services, in the right places, to meet the needs of our residents”.

4.4 The document can be used as a single point of information for developers looking to build homes in the borough, statutory and third sector agencies needing to understand the various socio-economic issues present in the area in order to better plan for their service demands, colleagues in internal and external Local Authority departments needing data to support their decisions, and anyone needing to understand the housing needs, and why they exist in Nuneaton and Bedworth.

5. Conclusion

5.1 Having a Housing Strategy that can be used as a reference for all interested parties looking to understand the housing needs in the borough is valuable to both the council and partners.

6. Appendices

APPENDIX A Housing Strategy 2024-34

APPENDIX B Equality Impact Assessment

APPENDIX C Health Equality Assessment Tool (HEAT)

7. Background Papers none

Assistant Director- Strategic Housing

HOUSING STRATEGY

2024 - 2034



PHOTO NEEDED

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FOREWORD

At Nuneaton and Bedworth Borough Council we have a clear vision for the borough, that we set out in our Corporate Strategy. Housing has an integral part to play in our Borough's ambitions and so I am delighted to introduce the new Housing Strategy 2024-34. Our previous Housing Strategy was adopted in 2017 and despite the unforeseeable difficulties and turmoil during the past 7 years, created by the Coronavirus pandemic, Brexit, the war in Ukraine, our exit from Afghanistan, along with new legislation such as the Homelessness Reduction Act, which came in to effect in 2018, we were still able to make very substantial progress in addressing the priorities of that strategy and we have highlighted some of those achievements.

Having a place to live is a basic human need and our vision is to ensure that all residents have access to affordable and warm housing in a safe and sustainable community leading to better health and well-being outcomes. Over the lifetime of the strategy, we intend to work closely with statutory, voluntary and community organisations, and partners to achieve our objectives.

The plan is intended to be strategic, high-level and articulates our goals and priorities over the medium term. This Plan builds on the excellent work of the Council and its partners over recent years and more recently reflects how our communities responded to the pandemic. We believe it shows our ambition to help realise the potential of Nuneaton and Bedworth Borough and will guide our actions as a Council. It sets out the Council's ambitions and actions to improve our local economy, support our residents to gain skills and employment, enhance their physical and mental health, their living environment, and overall prospects for the future.



***Councillor Chris Watkins,
Leader of Nuneaton and Bedworth Borough
Council and Portfolio Lead for housing***

PURPOSE OF THIS STRATEGY

The principal purpose of the Housing Strategy is to present stakeholders and interested parties with the housing needs landscape for our Borough. The document can be used as a single point of information for developers looking to build homes in the borough, statutory and third sector agencies needing to understand the various socio-economic issues present in the area in order to better plan for their service demands, colleagues in internal and external Local Authority departments needing data to support their decisions, and anyone needing to understand the housing needs, and why they exist in Nuneaton and Bedworth.

Throughout the document the Council will demonstrate a commitment to working in partnership to address the many challenges facing residents of the Borough in accessing affordable, safe, warm, and suitable accommodation.

The delivery of suitable accommodation for all, cannot be achieved by the council alone, and the many partners referenced in this document play a vital role in supporting our ambition of “seeking to provide the right houses, with the right services, in the right places, to meet the needs of our residents”.

AIMS

We will seek to provide the right homes, with the right services, in the right places, to meet the needs of our residents and work alongside our partners to transform our borough by:

- **RECOGNISING THE HOUSING CHALLENGES AND OPPORTUNITIES FOR OUR RESIDENTS.**
- **REDUCING THE BARRIERS IN ACCESSING GOOD QUALITY AFFORDABLE HOUSING.**
- **ENABLING APPROPRIATE SOCIAL HOUSING DEVELOPMENT.**
- **IMPROVING THE HOUSING STOCK.**
- **SPONSORING A SUSTAINABLE GREEN APPROACH.**
- **PRIORITISING COMMUNITY SAFETY AND EMPOWERMENT.**
- **PROMOTING RESIDENTS' HEALTH AND WELLBEING**

PRIORITIES 2024 TO 2034

Priority 1:

To maximise the delivery and availability of affordable homes to meet the needs of the Boroughs growing population, and to reduce homelessness and end rough sleeping for good.

Priority 2:

To make best use of the borough's existing and future housing stock, to ensure the residents have access to the right size and type of housing, including adaptations and adapted properties.

Priority 3:

To improve the quality of housing including improving energy efficiency and tackling damp and mould.

Priority 4:

Reduce the health inequalities faced by those requiring housing.

Priority 5:

To promote community safety in existing and future housing communities.

PHOTO NEEDED

NATIONAL CONTEXT

National legislation and policy majorly impact on the priorities and delivery of a council's housing strategy. It is important that the Borough remain current with legislative and policy changes and adopt flexible approaches to meet the challenges and opportunities they offer to improve and maximise housing delivery locally.

At the time of writing this strategy there are a number of important national legislations and policies that greatly influence the Boroughs approach to housing which have been introduced since our last strategy in 2017, including the following:

The Social Housing (Regulation) Act 2023 - significantly enhances the role and powers of the Regulator of Social Housing (RSH) for regulating the social housing sector and aims to protect tenants and improve the service they receive.

The Act has changed the regulation of social housing substantially including introducing new consumer standards for regulating social housing landlords and how the Regulator will regulate landlords against them. It aims to give tenants greater powers and access to redress when things go wrong. Landlords are required to listen to their tenants, to be more accountable and to treat them with fairness and respect, and to know more about the condition of every home and the people who live in them. The new standards also require social landlords to collect, report, and use data about their homes more effectively.

Consumer Standards:

Consumer standards apply to all registered social housing providers including local authorities; set by the Regulator of Social Housing they define the specific expectations and outcomes that all registered providers (landlords) must deliver and apply to the homes they provide and the tenants living in those homes. Below are the standards at the time of this strategy:

Neighbourhood and Community Standard:

- Safety of shared spaces
- Local co-operation
- Anti-social behaviour and hate crime.
- Domestic Abuse

Neighbourhood and Community Standard:

- Allocations and lettings
- Tenancy sustainment and evictions
- Tenure
- Mutual exchange

Safety and Quality Standard:

- Stock quality
- Decency
- Health and Safety
- Repairs, maintenance, and planned improvements
- Adaptations

Transparency, Influence and Accountability (including Tenant Satisfaction Measures):

Requires social landlords to collect and report annually on their performance using a core set of defined measures specified by the regulator, these are called the Tenant Satisfaction Measures (TSM). The TSMs are a core set of performance measures that must be collected and are published, and their main aim is to provide tenants with greater transparency about their landlord's performance. Landlords can demonstrate they make a positive contribution to neighbourhoods.

Awaab's Law 2024

Two-year-old Awaab Ishaak tragically died from exposure to mould in his social housing home; his death shocked the housing sector and following a petition by Awaab's parents, Awaab's Law was created, his law will when introduced be a component of the Social Housing (Regulation) Act. This law which was under consultation at the time of writing this strategy sets out the Governments' commitment to ensure nothing like Awaab's death happens again; it will require landlords to act promptly to address and fix reported damp, mould, and condensation hazards within specified timeframes and will hold landlords accountable if they fail to provide homes that meet specific acceptable standards.

Homelessness Reduction Act 2017-

significantly reformed England's homelessness legislation making amendments to the Housing Act 1996 Part 7 (Homelessness) and introduced new legal duties for local housing authorities. This Act focuses on prevention and relief of homelessness, regardless of priority need.

Housing and Planning Act 2016-

Introduced new measures to tackle Rogue Landlords including:

- Civil penalties as an alternative to prosecution for specified cases.
- Extension to rent repayment orders to cover more offences.
- Data base for rogue landlords and lettings agents.
- Banning order for serious or prolific offenders.
- Regulations for electrical safety.
- Classification on abandonment.

The Licensing of Houses in Multiple Occupation (HMO) (Prescribed Description) (England) Order 2018-

reformed the HMO licensing regime and statutory requirements prescribed under Part 2 of the Housing Act 2004, revoking and replacing the 2006 requirement for all HMOs over three storeys high to be registered by extending the mandatory licensing of HMO to properties that are less than three storeys high. It also introduced new mandatory national minimum bedroom size and waste disposal requirements.

Homes (Fitness for Human Habitation) Act 2019-

introduced on 20 March 2019 the new law aimed to ensure that rented homes (private and social housing) are fit for human habitation, healthy, safe, and free from serious harm. It enabled tenants to take action in court to enforce their landlord to carryout repairs and to pay compensation. This is not enforced by the council but is to empower tenants to hold landlords to account.

Electrical Safety Standards in Private Rented Sector 2020-

from 1 July 2020 for new tenancies and 1 April 2021 for existing tenants, all landlords of private rented accommodation are required to undertake an electrical inspection of the property every 5 years and to provide a copy of the report for the tenant; the report must be provided for all new tenants before they occupy the property.

Domestic Abuse Act 2021-

introduced new statutory duties on local authorities and changed homelessness legislation to give automatic priority need to survivors of domestic abuse. It provided the first legal definition of domestic abuse and recognises the many forms domestic abuse can take.

Supported Housing (Regulation and Oversight) Act 2023-

provides for the regulation, oversight, and enforcement powers of supported exempt accommodation by local housing authorities. The Act is aimed at improving the conditions in supported exempt accommodation.

The Government definitions of exempt and supported accommodation:

- Supported accommodation describes a range of housing types, such as group homes, hostels, refuges, supported living complexes and sheltered housing.
- Exempt accommodation is a type of supported housing where certain Housing Benefit provisions which limit claimants' entitlement to defined local levels do not apply. This means Housing Benefit may cover the full amount of rent charged by the providers.

It is defined as:

- A resettlement place; or
- Accommodation provided by a county council, housing association, registered charity, or voluntary organisation where that body or person acting on their behalf provides the claimant with care, support or supervision.

The Act introduces new regulatory requirements for local housing authorities including:

- Licensing of all exempt supported accommodation and providers.
- Regulation and enforcement using national minimum standards.
- Obligations for local authorities to develop a strategic supported housing plan.

Leasehold and Freehold Reform Act 2024-

introduces reforms to ground rent payments on new residential long leases for properties in England and Wales, the purpose of the act is to make owning a leasehold residential property fairer, more transparent, and more affordable for the leaseholder and to fulfil the government's commitment to set future ground rents to zero.

Renters Rights Bill 2024-

this is a major Bill that was in its' final stages as we developed this strategy; its' aim is to significantly reform the private rented sector. When enacted the Bill will provide new regulations that will change how the private rented sector is regulated and the rights of tenants renting a home privately.

Below are some of the changes the Act aims to:

- Abolish section 21 evictions
- Ensure possession grounds are fair to both parties
- Provide stronger protections against backdoor eviction
- Introduce a new Private Rented Sector Landlord Ombudsman
- Create a Private Rented Sector Database
- Give tenants strengthened rights to request a pet in the property
- Apply the Decent Homes Standard to the private rented sector
- Apply 'Awaab's Law' to the sector
- Make it illegal for landlords and agents to discriminate against prospective tenants in receipt of benefits or with children
- End the practice of rental bidding by prohibiting landlords and agents from asking for or accepting offers above the advertised rent.
- Strengthen local authority enforcement

PHOTO NEEDED

National Planning Policy Framework (NPPF)

Sets out the Governments' economic, environmental, and social planning policies for England and how they should be applied in the preparation of Local and Neighbourhood plans and to decisions on planning applications.

It provides a Framework for planners and developers on the development of housing including affordable housing. The Government reviews and amends the NPPF to ensure the framework is modern and is able to meet the needs and opportunities to increase the number of homes developed. The NPPF is a critical tool for the delivery of homes in the right places.

NPPF definitions of Affordable homes-

housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following NPPF definitions:

A.

Affordable housing for rent meets all of the following conditions:

- a.** the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents (including service charges where applicable).
- b.** the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and
- c.** it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

B.

Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

C.

Discounted market sales: is housing that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

D.

Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.

The NPPF is reviewed and updated to reflect the latest planning requirements; at the time of writing this strategy the Government were consulting on significant reforms to the NPPF to take a different, growth-focused approach.

Levelling Up

Nationally

Levelling Up White Paper 2022

In 2022 the Government published the Levelling Up White Paper which set out a plan to work towards ending geographical disparity.

Not everyone shares equally in the UK's success. While talent may be equally spread across our country, opportunity is not. Levelling up is a mission to challenge and change that unfairness. Levelling up means giving everyone the opportunity to flourish. It means people everywhere living longer and more fulfilled lives and benefiting from sustained rises in living standards and wellbeing.
Levelling Up the United Kingdom (White Paper 2022)

As part of the white paper, the government set out its' 12 clear, medium-term missions to provide consistency and clarity over levelling up policy objectives.

The Government's 12 Missions are:

1. Living standards
2. Research and Development
3. Transport
4. Digital Connectivity
5. Education
6. Skills
7. Health
8. Wellbeing
9. Pride in Place
10. Housing
11. Crime
12. Local Leadership

The Levelling Up and Regeneration Act 2023

The Levelling Up and Regeneration Act 2023 introduced measures to incentivise the faster building of housing. The Government want new homes built faster and to a higher standard. Under the Act, builders are required to submit high quality development plans that meet local needs and to build homes as quickly as possible once planning permission is granted and it supports local authorities to act against those who fail to meet these commitments.

The new measures to incentivise the prompt building are:

- Housing developers will be required to submit a Development Commencement Notice to formally notify the local authority Planning when they commence the development and
- To submit annually a Development Progress Report which will help local authorities to identify where delivery is too slow and to decide whether to sanction a developer for failure to build out their sites promptly.

Regionally

West Midlands Combined Authority – Levelling Up Growth Prospectus

The West Midlands Combined Authority (WMCA) Levelling Up Growth Prospectus sets out the tools needed to tackle the West Midland challenges and blueprint for levelling up. Since the original WMCA devolution deal in 2023, it has brought over £4.7 billion of new funding into the region, which has unlocked stalled investment through new Levelling Up Investment Zones.

The WMCA want to address the peoples' concerns about public services and restore pride of place, further prevent homelessness, and improve community safety.

locally

Delivering a Better Borough Warwickshire and Nuneaton and Bedworth Levelling up Plan:

Created by Warwickshire County Council, Nuneaton and Bedworth Borough Council, and local partners: Levelling up will build on the strengths of the borough and go further to support people to overcome the historic challenges they face and make sure they have good opportunities to get on in life regardless of where they are born in the Borough and who their parents are.

Warwickshire Levelling Up means 4 things:

- **Tackling inequalities:** addressing the gaps and inequalities in standards of living, health, happiness, and well-being including access to good affordable housing.
- **Increasing social mobility:** ensuring the success you enjoy in life is less dependent on where you live, your background and who your parents are.
- **Building community power:** Increasing pride in the place you live in and unleashing your voice and influence of your places.
- **Creating sustainable futures:** ensuring climate change and adaptation are central parts to levelling up so future generations can live in a sustainable county with good opportunities and quality of life.

Levelling up is designed to support everyone in different ways but recognises there are some people in the Borough who face challenges and need additional support in order to have the same opportunities.

The plan focusses on 17 priority Local Super Output Areas (LSOA) in Nuneaton and Bedworth who are amongst the 20% most deprived LSOA's nationally:

Ward	LSOA
Bar Pool	<ul style="list-style-type: none"> • Bar Pool North & Crescents • Bede Cannons
Bedworth Central	<ul style="list-style-type: none"> • Bede East • Bede North
Camphill	<ul style="list-style-type: none"> • East & Quarry • North West & Allotments • Queen Elizabeth Recreation Ground and Camp Hill - St Mary & St John
Exhall	<ul style="list-style-type: none"> • Poplar - Coalpit Field • Poplar - Nicholas Chamberlain
Hill Top	<ul style="list-style-type: none"> • Hill Top • Middlemarch & Swimming Pool • Riversley
Nuneaton Town Centre	<ul style="list-style-type: none"> • Abbey & Town Centre • Abbey North • Abbey Priory
Stockingford	<ul style="list-style-type: none"> • Kingswood - Stockingford Schools • Kingswood Grove Farm & Rural

There is an additional focus on Nuneaton and Bedworth town centres regeneration.

Housing plays a major role in the lives of the key groups identified in the plan and has major impacts on their lifestyle and ability to thrive.

Housing and homes are key detriments to health especially for those living in homes that are overcrowded or with poor living conditions for example living in damp and mouldy dwellings. These can not only affect a person's physical health but can have a major impact on the mental health and wellbeing of a person living in those conditions including children.

The Council will focus on improving housing conditions across the Borough in order to promote good health.

Actions required by Housing:

- To improve our understanding of housing conditions and ways we can reduce the prevalence of damp and mould:
- To take a multi-agency approach towards improving housing conditions that impact on health including damp and mould levels by:
 - First identifying all homes with damp and mould within the 17 priority LSOA areas, and
 - Taking necessary remedial action.
- Boost energy efficiency levels of the Borough's housing stock by:
 - Identifying homes which fall below an EPC rating of C.
 - Taking collective action to ensure homes achieve an EPC of C and above..

At the time of the development of this strategy the local administration were in the process of reviewing the requirements and commitments of levelling up locally.

TACKLING CLIMATE CHANGE: CONTEXT, CHALLENGES AND OPPORTUNITIES

National context

Climate change is a global concern, and the impact is the biggest threat to our planet; we are seeing growing occurrences of extreme weather conditions; floods, droughts, and ecological damage that are causing international disasters and loss of life. It is important therefore that everyone plays their part to reduce the causes of global warming and climate change.

In May 2019 the government became the world's first parliament to declare a "climate and ecological emergency". Adopting the term "climate emergency" this was followed by local authorities and organisations around the country issuing their own declarations and commitments to becoming a carbon neutral organisation.

By declaring a Climate Emergency local councils acknowledged the need to act on the causes and impacts of climate change. Climate change cuts across all council departments, it is important that we acknowledge the causes and impacts of climate in our strategies including housing.

Net Zero Strategy: Build Back Greener –

sets out the Government's policies and proposals for decarbonising all sectors of the UK economy to meet the net zero target of 2050.

From heating homes to filling up cars, burning fossil fuels release greenhouse gases that increase global warming. The commitment to stop burning fossil fuels will mean new ways of making things such as concrete and steel, an end to the petrol and diesel engine and using fossil fuels for heating. Renewable energy is considered to be the way forward including within our homes. The Net Zero strategy sets out the Governments' 4 key principles approach:

1. **We will work with the grain of consumer choice:** no one will be required to rip out their existing boiler or scrap their current car.
2. **We will ensure the biggest polluters pay the most for the transition** through fair carbon pricing.
3. **We will ensure that the most vulnerable are protected through government support** in the form of energy bill discounts, energy efficiency upgrades, and more.
4. **We will work with businesses to continue delivering deep cost reductions in low carbon tech** through support for the latest state of the art kit to bring down costs for consumers and deliver benefits for businesses.

In order to meet their aim, the governments key policies are:

- **Power:** aim is for the UK to be entirely clean electricity subject to the security of supply.
- **Fuel and hydrogen:** to scale up the production of low energy fuel alternatives to fossil fuels.
- **Industry:** to decarbonise industry by supporting them to switch to cleaner fuels.
- **Heat and buildings:** main ambition is that by 2035, no new gas boilers will be sold; investment in Heat Pump technologies, boiler upgrades and delivering cheaper electricity. This includes funding for the Social Housing Decarbonisation Scheme and Home Upgrade Grants that aims to reduce emissions from public sector buildings by 75% by 2037.
- **Transport:** to introduce a zero-emission vehicle mandate. .
- **Natural Resources, waste, and fluorinated gases:** investment to support low-carbon farming and agriculture.
- **Greenhouse Gas Removal (GGR):** Investment in GGR innovation and explore options for regulatory oversight.
- **Supporting the transition with cross-cutting action: by:**
 - Providing funding to support net zero innovation projects,
 - Introducing a new Sustainability Disclosures Regime.
 - Reforming the skills system so that training providers, employers and learners are incentivised and equipped to play their part in achieving the ambition of net-zero.
 - Publishing an annual progress update.

Energy Performance Certificates 2030 Target:

In July 2024 the Government announced that all landlords including local councils will need to attain an Energy Performance Certificate rating of C and above for all of their properties by 1 April 2030. This target also applies to all properties owned by landlords in the private rented sector.

Locally: Tackling climate change in our Borough

At a council meeting on the 4 December 2019, Nuneaton and Bedworth declared a “climate emergency” and in doing so committed to becoming a carbon neutral organisation.

Opportunities – Housing’s contribution to tackling the climate emergency:

In 2023 the Council set out it’s five Health Priorities, these included improving the energy efficiency of housing stock in the Borough. We set out how we propose to improve the energy efficiency of existing and new build council housing and the private housing sector in Nuneaton and Bedworth

OUR COMMITMENTS:

Existing Council Housing:

Energy Performance Certificate 2030 target:

In response to the Government announcement in July 2024 that all landlords must attain an Energy Performance Certificate (EPC) rating of C and above by 1 April 2030; the Council undertook an immediate review of the current energy performance ratings of its' own housing stock. We currently have EPC ratings for 76% of the dwellings in our portfolio and of those only 45% of homes currently meet the Government target EPC rating of C and above. We will implement a programme in the next Financial Year to obtain EPC ratings for all our homes following which a Decarbonisation Strategy will be developed to ensure all our housing stock meet the C and above rating requirements by 2030.

We will adhere to British standard (BS) Publicly Available Specification (PAS) 2035 as Local Authority Delivery (LAD) I, II and wave 1 and 2 (wave 2 to be confirmed) through Social Housing Decarbonisation Fund (SHDF).

The BS PAS 2035 (LAD 1, 11 and wave 1 and 2) is the official framework for the “whole house” approach for retrofitting dwellings for improved energy efficiency in the United Kingdom. It uses the fabric first approach including measures such as insulation and better windows to reduce heating loss first followed by low carbon renewable technology. It considers the home, the environment, the occupancy, and the suitable measures to install.

We have and will continue to:

- Consider a whole house solution focusing on a fabric first approach i.e. external wall insulation, replacement windows and doors, and increased loft insulation.
- Replace, as required, old boiler to hydrogen ready.

Council Housing - New Builds

We have and will continue to include specific design features in all new council housing building specifications to ensure the homes we build deliver maximum energy efficiency. New council homes currently being built by the Borough include the following features:

- Photovoltaic (PV) technology – PV materials and devices that convert sunlight into electrical energy.
- Heat recovery gas boiler flues.
- Insulated lintels
- Increase airtightness measures.
- Better details to reduce cold bridging.
- Increased insulation
- Hydrogen boilers
- Currently reviewing air source pumps

Private Sector Housing

We aim to:

- Secure funding for the delivery of improvements in thermal efficiency of private sector housing stock and aim to deliver improvements to privately owned properties.
- Create a domestic energy efficiency strategy to improve the efficiency of private sector properties which will establish a baseline for the Borough.
- Improve the energy efficiency of private rented housing by promoting and enforcing the Minimum Energy Efficiency Standards (MEES)

Our housing commitment to climate change:

We will continue to increase the energy efficiency of the housing stock in the borough by:

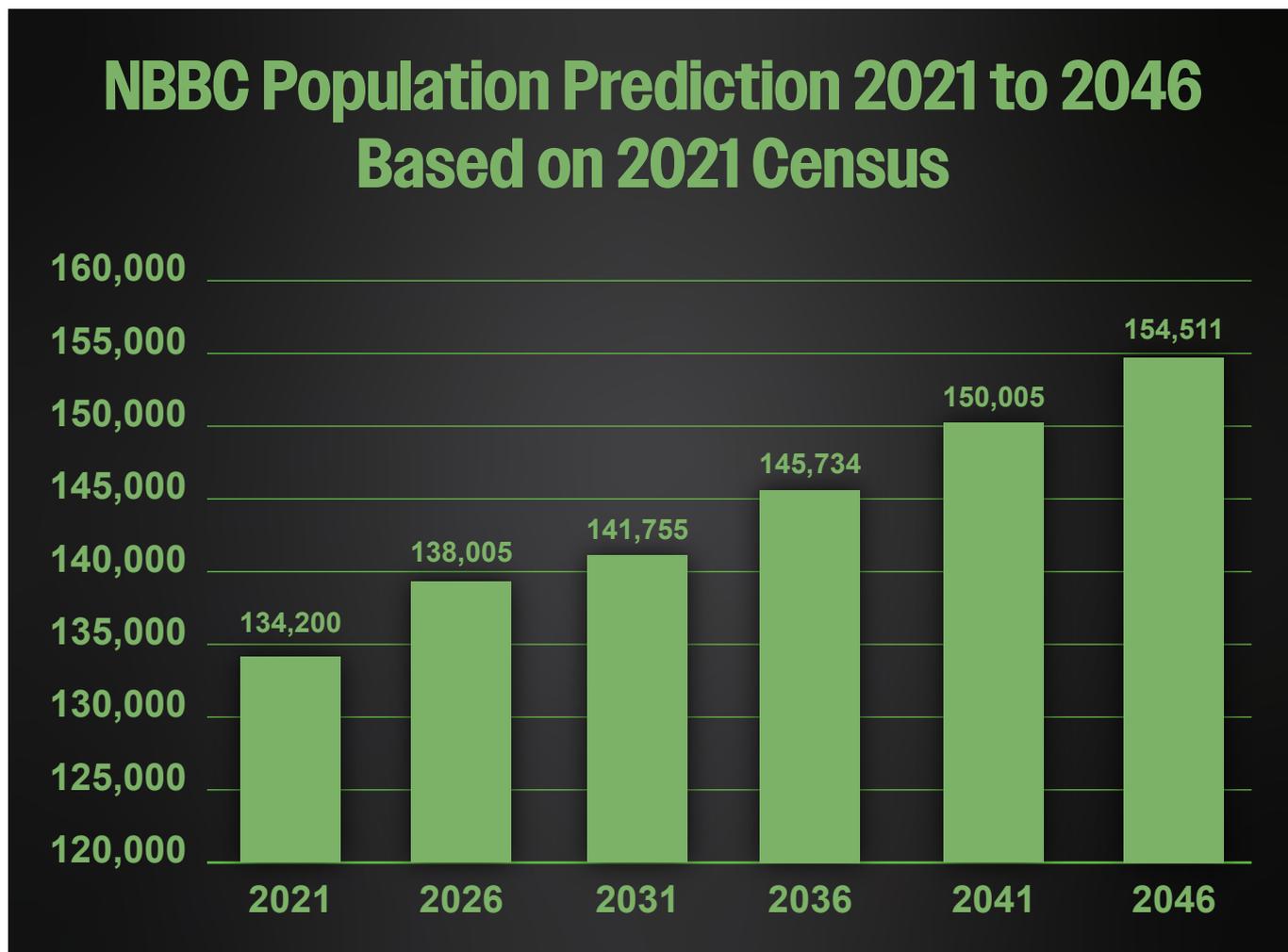
- Implement a Decarbonisation Strategy to meet the Government target for all council dwellings to attain an Energy Performance Certificate (EPC) rating of C or higher by 2030.
- Improving council owned stock by adhering to the BS PAS 2035 and any subsequent sector guidance and by adopting a whole house approach to retrofitting improvements.
- Being innovative in our approach to energy efficiency measures, by including measures in the design specification in the new homes we build.
- Securing funding to improve private sector homes.
- Promoting and enforcing the Minimum Energy Efficiency Standards.
- Raising awareness and supporting the private housing sector by providing information, and signposting eligible homeowners to available funding.
- Working with our colleagues and stakeholders locally, regionally and nationally to help to meet the Borough commitment to become carbon neutral.

OUR BOROUGH: LOCAL CONTEXT

Nuneaton and Bedworth is one of the five borough and district councils within Warwickshire. A largely urban authority, covering 7,895 hectares it is the smallest geographically of the five, but has the 3rd largest population according to the census in 2021.

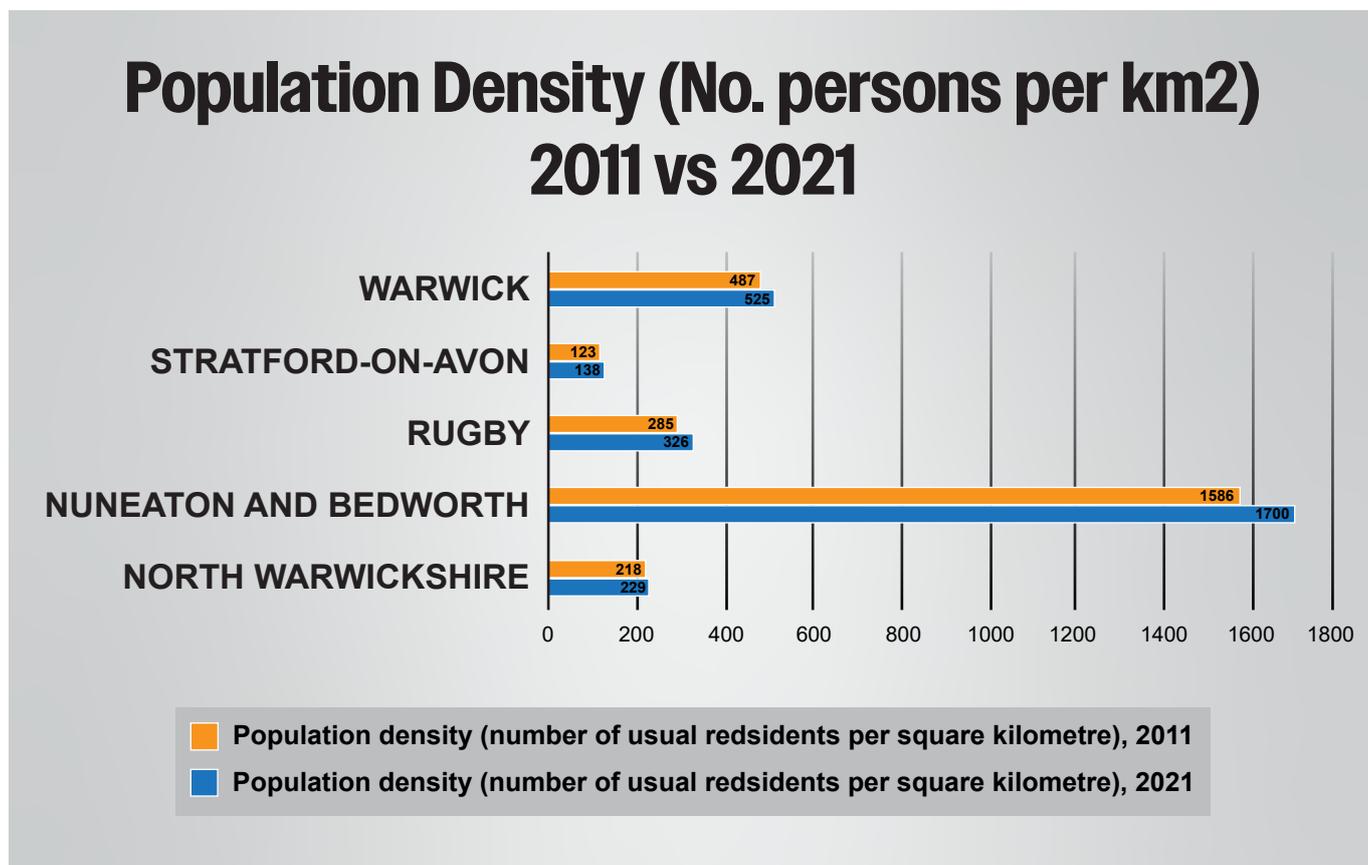
Population:

There were over 134,200 people residing in Nuneaton and Bedworth according to 2021 Census, this equates to an increase of over 8,000 people since the last census in 2011. The rise in population is greater than predicted by the Office of National Statistics in 2018 who predicted the boroughs population would rise to around 131,186 by 2021. The graph below shows that, applying the predicted percentage increases used by the ONS the population in Nuneaton and Bedworth will rise steadily by circa 15% to over 154,000 by 2046.



(Census data 2021 applying ONS prediction percentages)

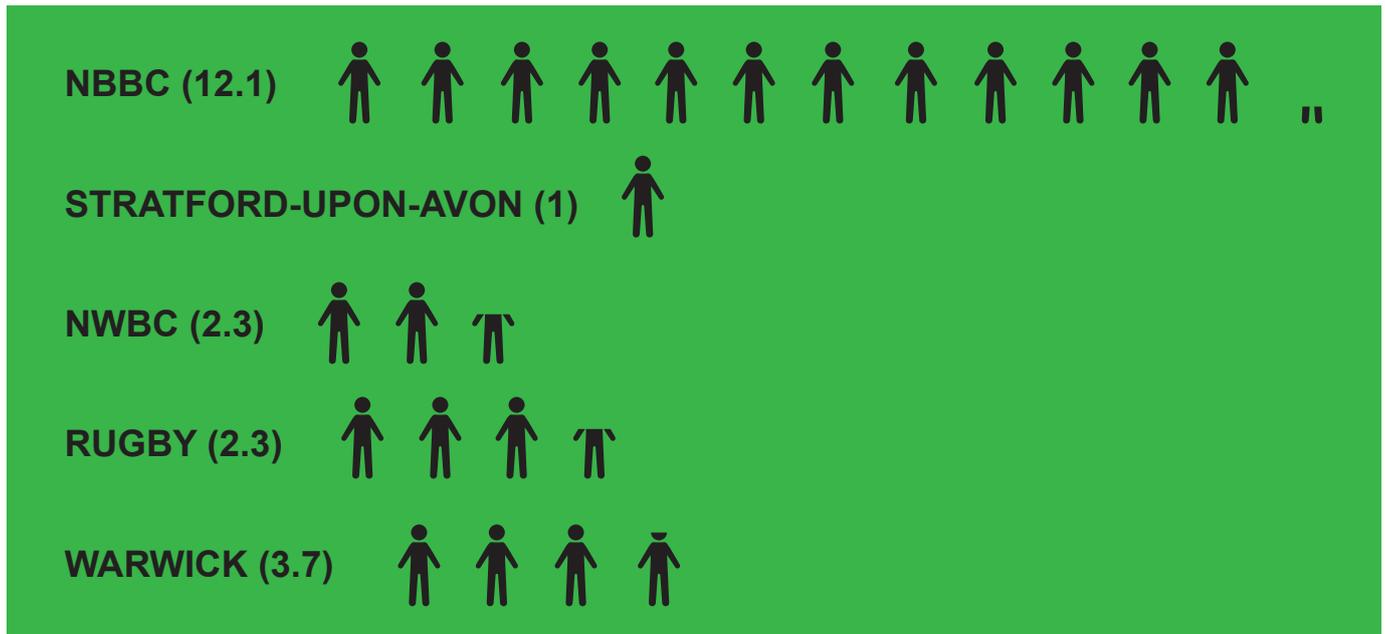
A continued increase in population will also mean a rise in population density. There continues to be a striking difference between the population density in Nuneaton and Bedworth compared to its neighbouring authorities; the borough is the 10th most densely populated local authority area in the West Midlands and amongst 33% of the most densely populated English local authority areas. By contrast our neighbouring authorities in Warwickshire are all within 60% of the least populated areas of England. According to the latest Census in 2021 there were 1,700 people per square kilometre in Nuneaton and Bedworth compared with 229 persons in North Warwickshire and 138 in Stratford-upon-Avon. Below demonstrates the population difference amongst the local authorities in Warwickshire.



Office for National Statistics (ONS) Census 2021 Population Density

Putting population into a context to visualise density, the Office for National Statistics (ONS) display this in terms of number of people per football pitch-sized piece of land, following the Census in 2021 it is estimated that there was the equivalent of 12.1 people per football pitch-sized piece of land in the borough, compared with North Warwickshire 2.3 people, and Stratford-on-Avon only 1 person per football pitch-sized piece of land.

Population Density 2021 – Number of people per football pitch-sized piece of land.



(Source: How Life has changed: 2021 census Office for National Statistics)

Age of the Population

The average age of the Boroughs' population remains at 40 years of age, this is similar to the other local authority areas of Warwickshire, the West Midlands and England.

The number of people aged between 50 to 64 years rose by just under 2,900 (12%) while the number of people aged 35 to 49 years fell by 1,700 (6.3% decrease).

The tables below show the number of people per age band compared with the other local authorities within Warwickshire and the county as a whole.

2021 Census Age data	Total	0 to 19 years	20 to 39 years	40 to 59 years	60 to 79 years	80 years Plus
North Warwickshire	65,035	13,696	14,728	17,921	15,064	3,626
NBBC	134,204	31,032	34,378	35,295	27,032	6,467
Rugby	114,366	26,909	29,365	31,067	21,221	5,804
Stratford-on-Avon	134,727	27,058	26,927	37,478	33,819	9,445
Warwick	148,452	32,931	40,768	38,754	28,018	7,981
Warwickshire	596,784	131,626	146,166	160,515	125,154	33,323

ONS Age report Census 2021

Nuneaton and Bedworth changes in age bands between last 2 censuses:

Percentage in Nuneaton and Bedworth	2011	2021	Change
85 years and over	1.90%	2.20%	0.30%
75 to 84 years	5.40%	6.50%	1.10%
65 to 74 years	9.40%	10.30%	0.90%
50 to 64 years	19.00%	19.90%	0.90%
35 to 49 years	21.60%	18.90%	-2.70%
25 to 34 years	12.60%	13.80%	1.20%
20 to 24 years	6.00%	5.30%	-0.70%
16 to 19 years	5.00%	4.00%	-1.00%
10 to 15 years	7.20%	7.20%	0.00%
5 to 9 years	5.60%	6.10%	0.50%
4 years and under	6.30%	5.80%	-0.50%

Projected Population Aged 60 and over.

Nationally the number of people aged 60 and over is projected to continue to increase over the next 25 years as people are living longer. The draft Nuneaton and Bedworth Housing and Economic Needs Assessment (HEDNA) 2022 predicts there will be a major increase in the number of households aged 60 and over in the Borough; the chart below shows the predicted changes in the over 60's population. It is noticeable all age bands except the 60 to 64 age group are predicted to rise substantially. This prediction shows that by 2039 there will be almost 28,000 people aged over 60 living in the Borough, an increase of over 5,500 since the census in 2021.

It is apparent the population of the Borough is living longer; however, many will be living with poor and declining health; it is important that we encourage and support housing options for older people that will allow them to remain independent and stay in their own home for as long as possible.

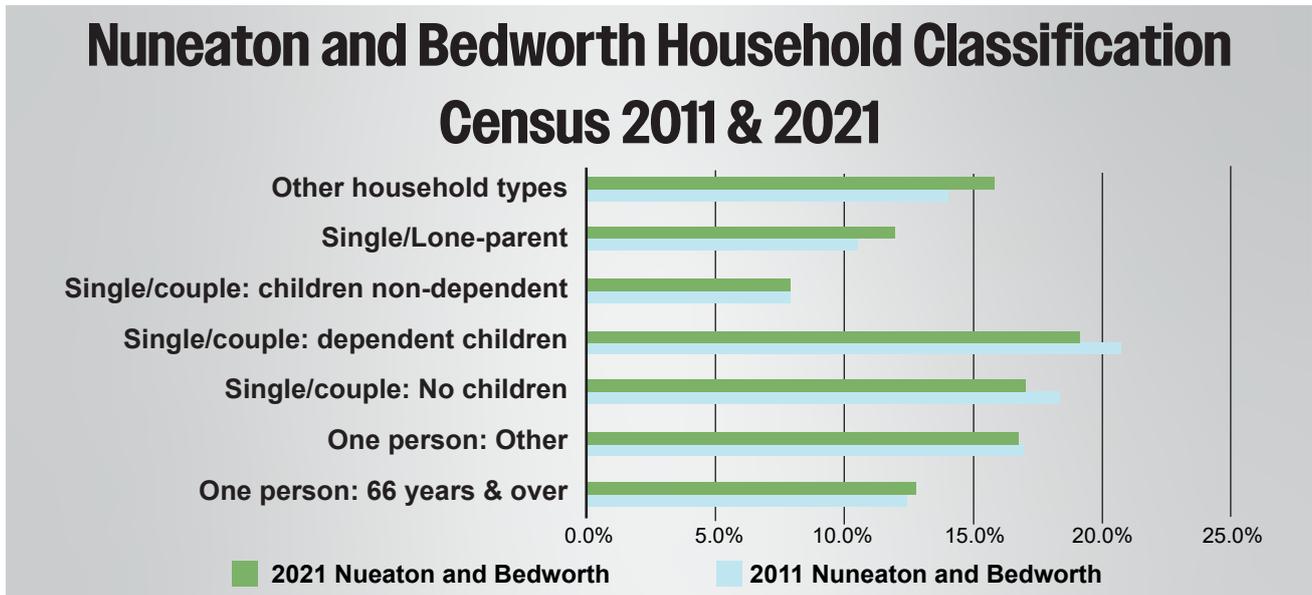
We need to consider a wide range of housing options for older people that are safe, well designed, and self-contained. We will encourage the development of properties suitable for those who just want to downsize, and for those who need specialist supported accommodation, independent living (sheltered housing), and extra care to meet the wide range of needs of our ageing population.

There has been a general shift away from residential care and nursing homes and the extra care housing model is considered to offer a safe and secure accommodation option where care can be provided at varying levels allowing people to remain independent living in their own home. We will work with Warwickshire County Council and their emerging Technical Guidance Standards to ensure the development of supported housing and housing with care meets the required standards.

Over 60's Population changes Sub-Regional HEDNA 2022	2021	2039	Change in Households	% Change
60 - 64	4,711	4,786	75	1.6%
65 - 69	4,434	5,401	967	21.8%
70 - 74	4,640	5,668	1,027	22.1%
75 - 79	3,691	4,700	1,010	27.4%
80 - 84	2,599	3,549	950	36.5%
85 and over	2,090	3,620	1,530	73.2%

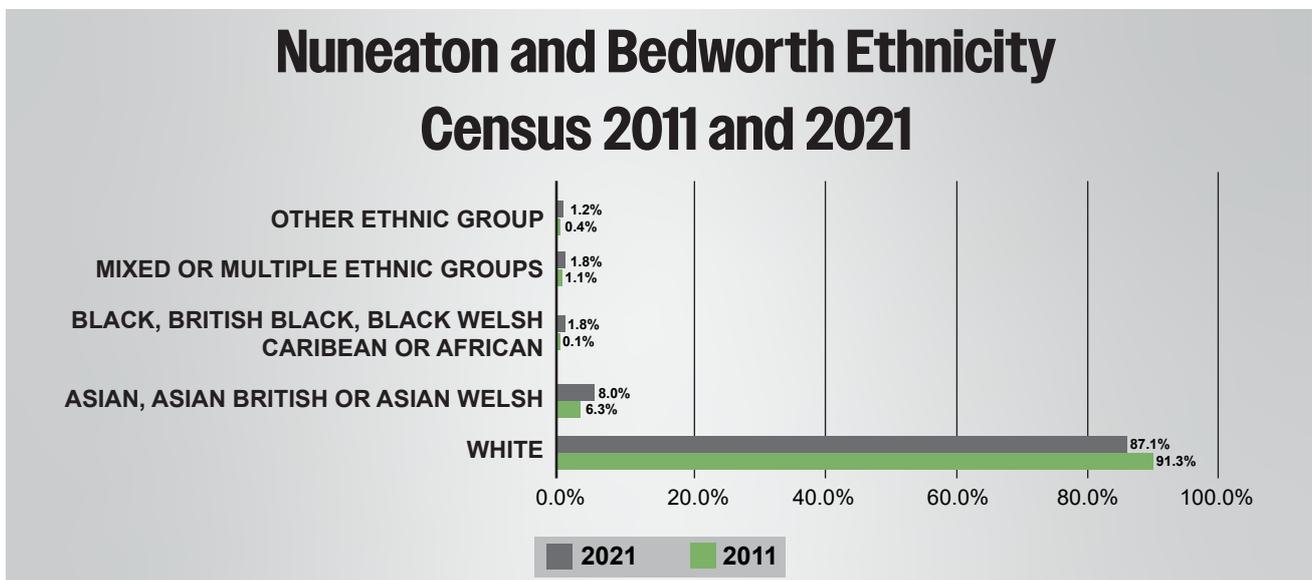
Household Growth and Composition:

The classification of households in Nuneaton and Bedworth in the 2021 census is very similar to both the West Midlands Region and England and shows very little change from the 2011 census.



Ethnicity

The ethnic make-up of the Borough continues to change and diversify. The chart below shows the changes in ethnicity between the 2011 and 2021 censuses.

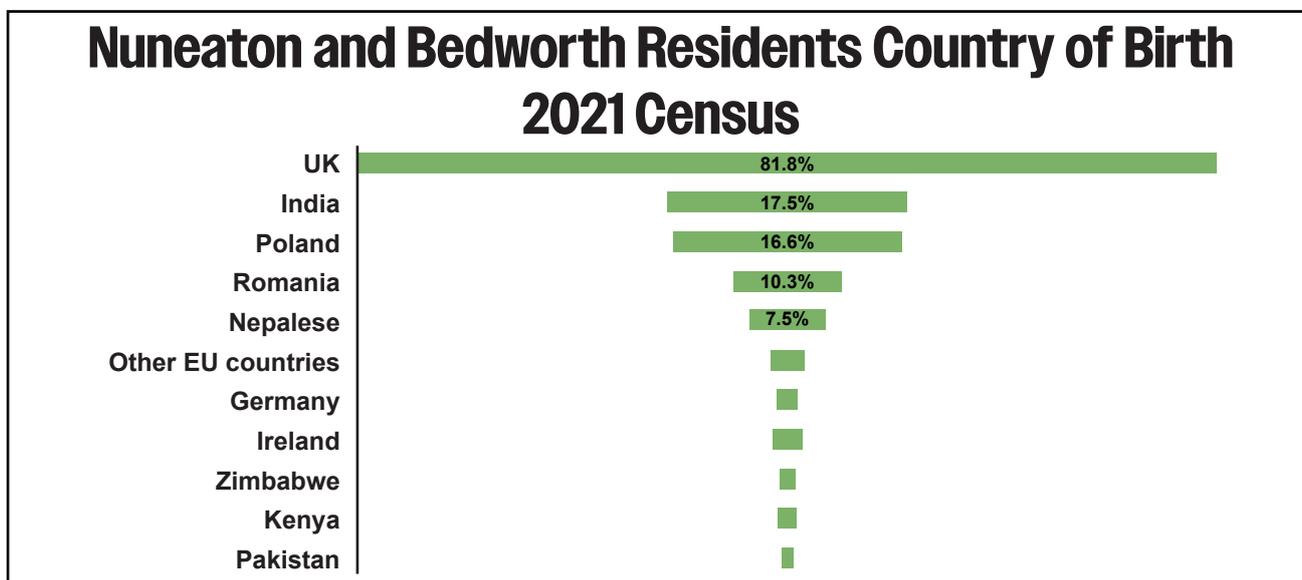


According to the latest Census in 2021, 11.5% of people living in Nuneaton and Bedworth recorded as being born in countries outside of the UK, this is an increase from the 2011 Census that recorded 6.8% of the population.

The most prevalent country of birth (17.5%) after those born in the United Kingdom continues to be India, with people born in Poland being the second highest (16.6%). People identifying as Indian ethnicity continues to be the second largest community in Nuneaton and Bedworth.

The Borough's Nepalese community has continued to grow; the 2021 Census recorded around 1500 residents who identified as Nepalese. The majority are veterans with multiple generations having served in the British Army.

The chart below shows the countries of birth as recorded in the last census including for those not born in the United Kingdom.



Languages spoken:

English remains the main language spoken in the Borough but we now have a larger number of residents aged 3 years and above who identify as speaking other main languages.

The table shows the main languages spoken by the population of Nuneaton and Bedworth aged 3 years and over as identified in the 2011 and 2021 censuses.

Main Language Spoken Age 3 and over	Census 2011	Census 2021
English	95.83%	92.63%
Any other UK Language	0.01%	0.01%
French	0.04%	0.07%
Portuguese	0.03%	0.07%
Spanish	0.03%	0.11%
Polish	0.91%	1.78%
Other (EU) European Language	0.25%	1.63%
Other (Non-EU) European Language	0.02%	0.07%
Russian	0.06%	0.14%
Turkish	0.02%	0.05%
Arabic	0.04%	0.07%
West or Central Asian	0.07%	0.07%
Punjabi	0.82%	0.99%
Urdu	0.17%	0.13%
Bengali (with Sylheti and Chat Gaya)	0.03%	0.03%
Gujarati	0.67%	0.40%
Tamil	0.06%	0.17%
Other South Asian Language	0.65%	1.22%
Chinese	0.12%	0.12%
Other East Asian Language	0.06%	0.07%
African	0.08%	0.11%
Other	0.04%	0.05%

Employment and Education

Not in Education, Employment or Training (NEET):

In 2022 the department of Education reported that the number of 16 and 17 years old who were not in education, employment or training in Warwickshire was less than both the West Midlands and England averages at 1.7%. With on average 2.1% of 16 and 17-year-olds in Nuneaton and Bedworth not in education, employment or training the Borough was the highest of the five Warwickshire district and borough councils but was lower than the averages for both England (4.7%) and the West Midlands (5%). However, the actual number of NEET young persons in the Borough is still highest in Warwickshire.

Below is a table showing the number of NEET 16 and 17 years in each council area based on the average over the three months December 2021 to end of February 2022:

16- and 17-year-olds Not in education, Employment or Training (NEET) @ February 2022	% NEET 16- & 17-Year-olds	No. NEET 16- & 17-year-old
Nuneaton and Bedworth	2.1%	62
North Warwickshire	1.5%	21
Rugby	2.0%	46
Stratford-upon-Avon	1.3%	32
Warwick	1.2%	32

Educational Attainment:

The educational attainments in Nuneaton and Bedworth are generally lower than the other districts and boroughs in Warwickshire and England with the exception of Key Stage 4.

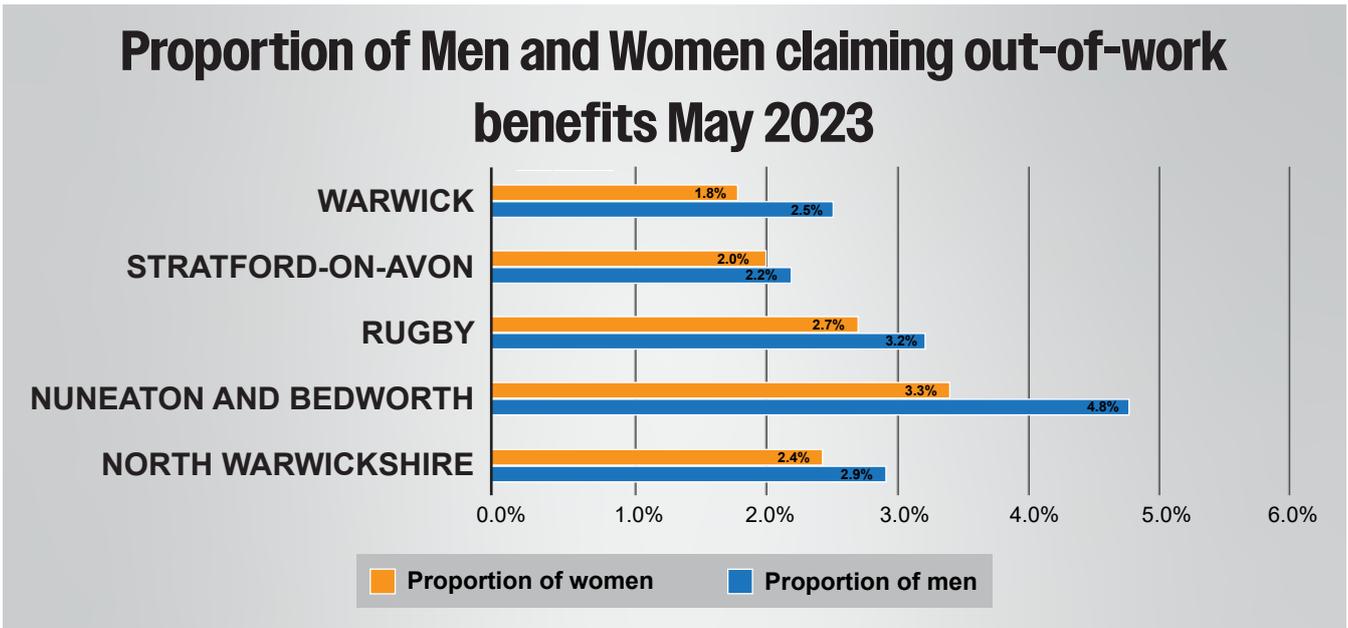
Educational Attainment 2023	Nuneaton and Bedworth	North Warwickshire	Rugby	Stratford-upon-Avon	Warwick	England
Key Stage 4: % of pupils achieving a Strong Pass (Grade5+) in English and Maths GCSEs (15- and 16-year-olds)	40%	34%	55%	58%	52%	45%
Post 16 -A Level students: Average grade	C	C	B-	B	B-	C+
Post 16- % Achieving AAB in at least 2 subjects	7.2%	8.7%	22.1%	30.3%	18.9%	15.6%

Higher level skills attainment:

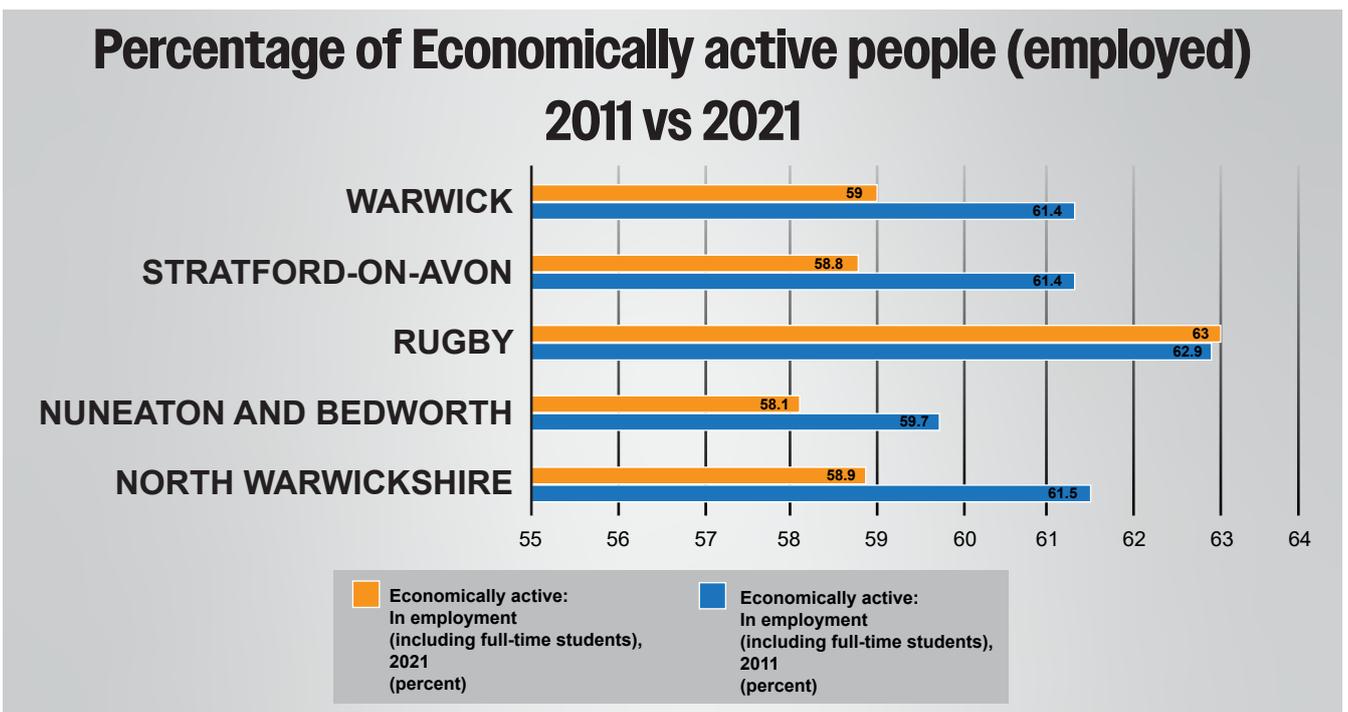
According to the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA), in 2022 Nuneaton and Bedworth had the lowest attainment rate of higher-level skills (NVQ4+) which equates to degree level and above of all five Warwickshire council areas and Coventry with only 30% of people qualified to this level living in the Borough.

Employment:

Number of people claiming out-of-work benefits (Universal Credit and Jobseekers Allowance)



Regional Labour Market Count – ONS Labour and Market data May 2023



ONS Economically active data 2011 & 2021 Census.

Deprivation

The England Indices of Multiple Deprivation (IMD) 2019 highlights the significant inequalities between the Warwickshire districts and boroughs. The Borough has the highest levels of deprivation across the county and ranks as the 101st most deprived local authority district nationally (out of 317).

There is also a divide within the borough, we have five Super Output Areas that are amongst the top 10% most deprived areas in the country, with Bar Pool North and The Crescents ranked within the top 3% deprived Super Output Areas in England.

The IMD demonstrates the Borough has the highest levels of deprivation as well as high numbers of priority families and defined children living in poverty in Warwickshire, all of which contribute to the profile of the Borough's need for social housing. 6% of the Lower Super Output Areas (LSOAs) are in the 10% most deprived nationally, and 59% are within the 50% most deprived area.

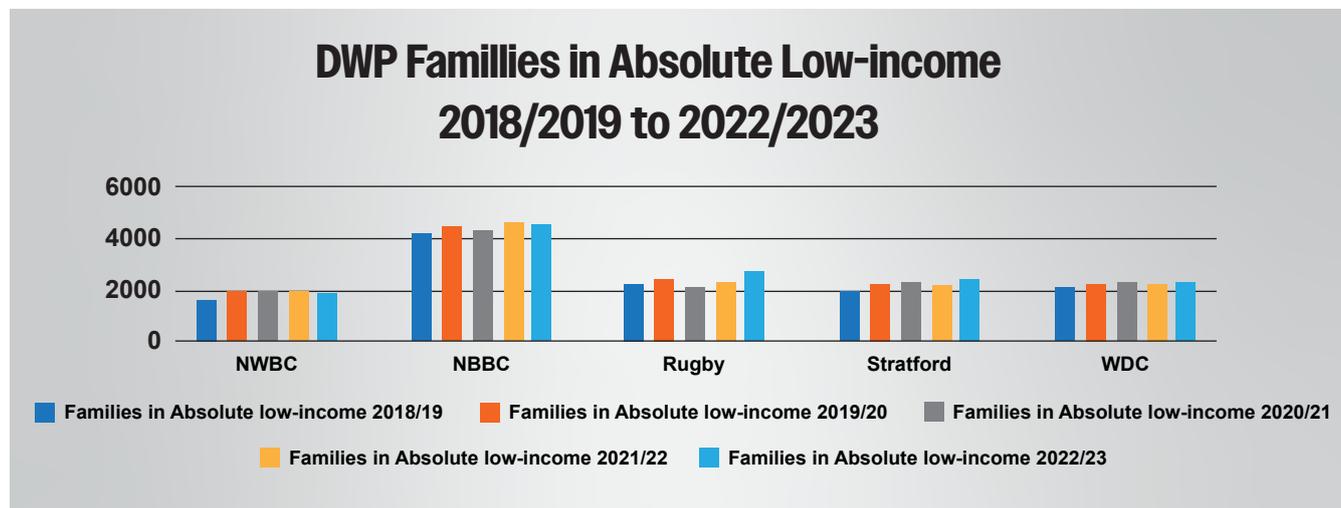
There are 17 LSOAs in Nuneaton and Bedworth that are ranked within the 20% most deprived LSOAs nationally. These 17 most deprived LSOA areas are:

- Bar Pool North & Crescents
- Bede Cannons
- Bede East
- Bede North
- East & Quarry
- North West & Allotments
- Queen Elizabeth Recreation Ground and Camp Hill - St Mary & St John
- Poplar - Coalpit Field
- Poplar - Nicholas Chamberlain
- Hill Top
- Middlemarch & Swimming Pool
- Riversley
- Abbey & Town Centre
- Abbey North
- Abbey Priory
- Kingswood - Stockingford Schools
- Kingswood Grove Farm & Rural

The Boroughs skills and qualifications levels are below average, with the proportion of residents with level 4+ skills (equivalent to degree) at 30% compared to 41% nationally and regionally, however there are above average numbers of residents with levels 1 and 2 skills, which is a reflection of the level of residents employed in lower paid/skilled jobs.

Whilst unemployment at 3.5 % is below the regional average of 4.4%, the median gross weekly pay is low at only £536.60 compared with £650.70 regionally, and £ 681.70 nationally.

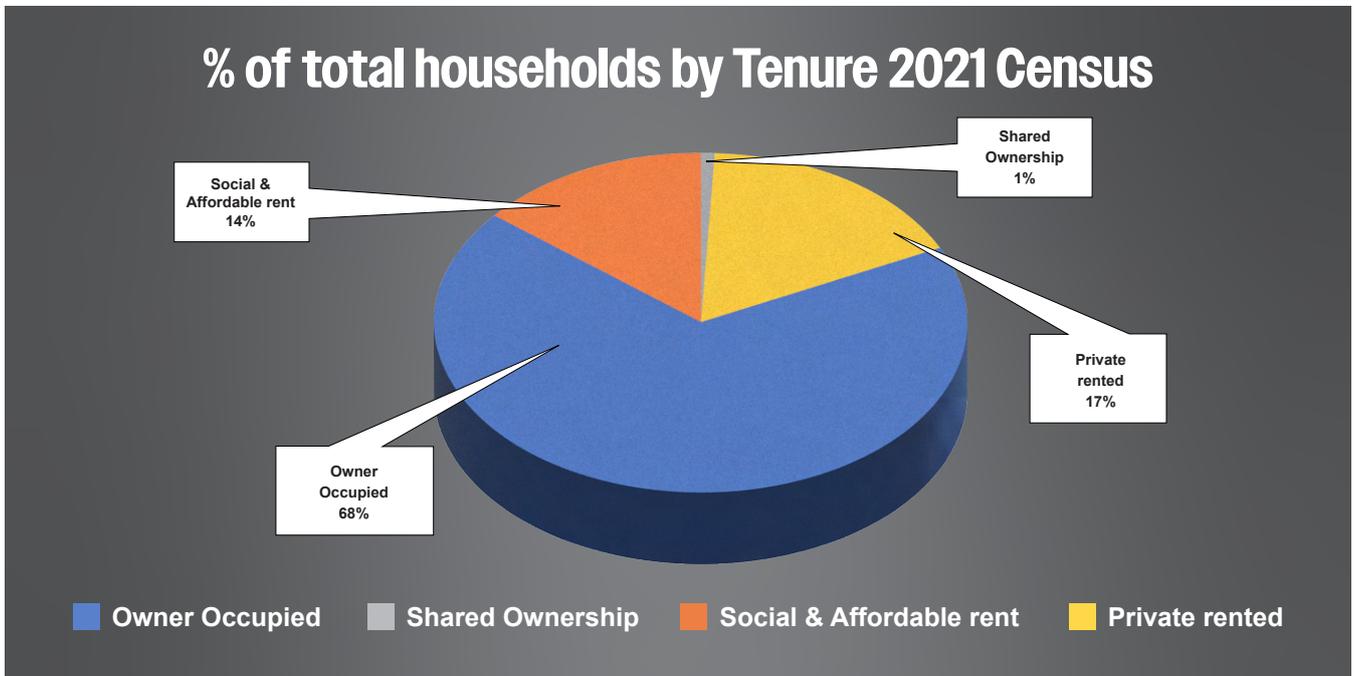
Below is a table showing the Department of Working Pension figures for families in Absolute low-income. Absolute low-income is defined as a family whose equivalised income is below 60 per cent of the 2010/11 median income adjusted for inflation. Gross income measure is Before Housing Costs (BHC) and includes contributions from earnings, state support and pensions. This tables shows that Nuneaton and Bedworth have more families living in Absolute Low-income than any other district or borough in Warwickshire.



The cost-of-living crisis has seen a major increase in the use of food banks such as those provided by The Trussell Trust. According to the Trust in the year 2023 to 2024 they distributed 3.1 million emergency food parcels nationally from their sites around the country. In the year June 2023 to June 2024, 7,928 of those food parcels were issued from the four Trussel Foodbank sites in Nuneaton alone, and of those issued 2,785 were for children. The use of foodbanks is another indicator of the levels of hardship being faced by some households in the Borough.

Housing tenure and affordability

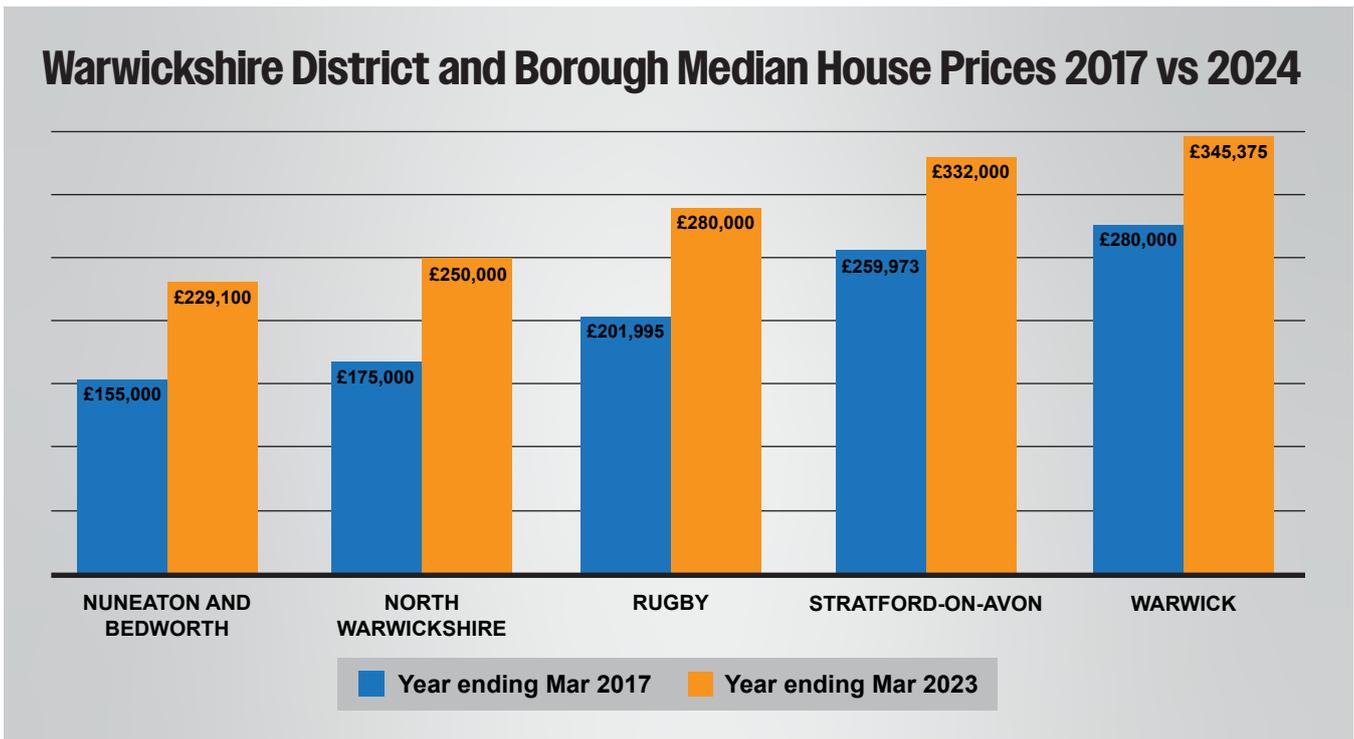
Over 68% of residents in the Borough are owner occupiers, this is higher than the national average for England and Wales at 62%, however the number of owner occupiers has dropped from 71% since the last Housing Strategy. Households renting their homes has increased; the percentage renting in the private rented sector has risen by 5% from 12% in 2011 to 17%, making it the second highest tenure type in the borough. The social rented sector also increased from 12% to 14%, and shared ownership remains the lowest percentage tenure at below 1%.



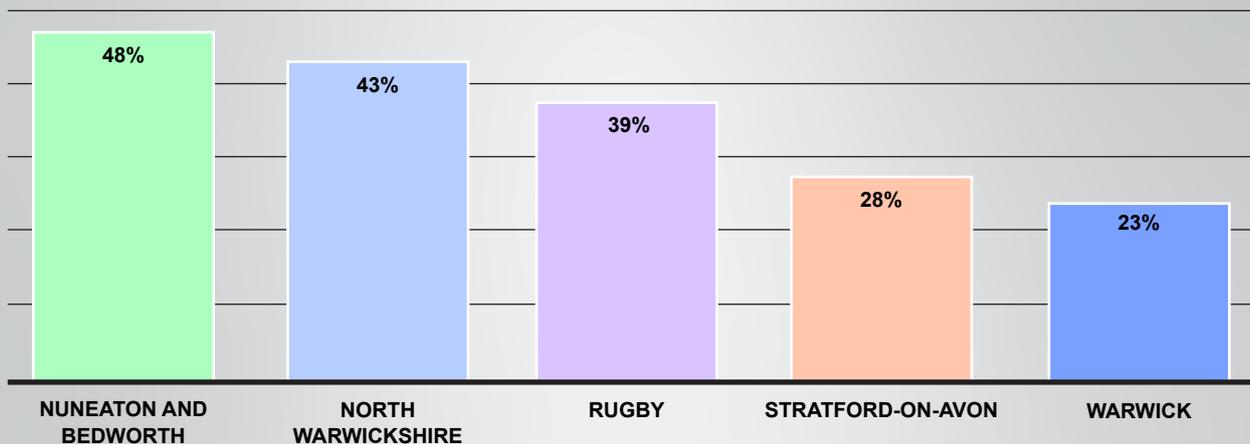
House prices April 2023

The median house prices in the Borough have remained lower than the four other districts and boroughs in Warwickshire, however according to the latest median house price figures published by ONS, Nuneaton and Bedworth have seen a higher percentage increase with a 48% increase in house prices.

The charts below show the comparisons between median house price 2017 to 2024, the percentage and the price increased. House prices in the Borough have risen by the highest percentage.



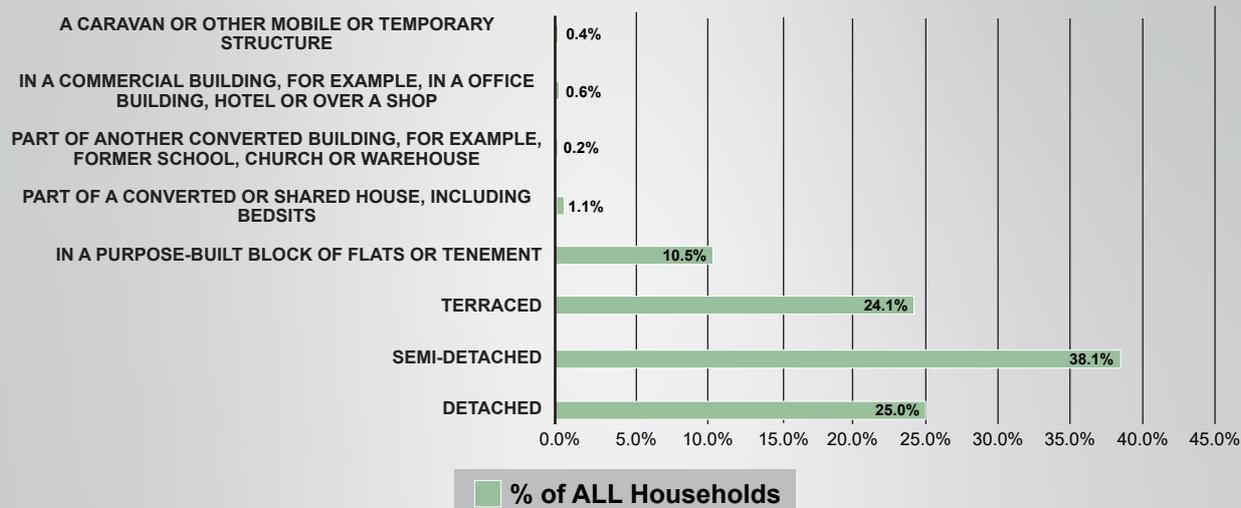
Warwickshire District and Borough Median House Price % increases between 31 March 2017 & 31 March 2023



Government Average House Prices April 2023

Households by Accommodation type Census 2021

NBBC % of Households by Accommodation Type Census 2021



ONS – Accommodation type - Census report 2021

Community Safety

The Council recognise that residents deserve the right to feel is safe in their community and are committed to making Nuneaton and Bedworth a place where people want to live, work and visit. It is important that our residents do not live with or in fear of anti-social behaviour or crime especially in their own home and neighbourhood. The Council is committed to working with our partners and residents to quickly identify, respond and escalate appropriately to address issues of crime and anti-social behaviour in the community to achieve this, and to restore public trust in their community.



Crime

The deprivation Crime domain measures the risk of personal and material victimisation of crime in each LSOA; 10% of the LSOAs in the Borough are ranked within the 10% most deprived areas for crime nationally, and 68% are within the lowest 50%.

Community Safety

The Nuneaton and Bedworth Community Safety Partnership (CSP) work in close collaboration with partner agencies to reduce crime and the fear of crime in the Borough and determine the priority areas based on levels of incidents and local need. The partnership includes members from Warwickshire Police, registered providers, NHS, and staff from our Community Safety and Anti-Social behaviour teams. The Nuneaton and Bedworth CSP priorities for 2021 to 2025 are:

- **Priority 1: Violent Crime** - with a focus on knife and weapon crime, and domestic violence (and serious violence prevention priorities including public place violence).
- **Priority 2: Serious Acquisitive Crime** – respond to volume of crime and disorder categories emerging post COVID-19 (including ASB and Cyber Fraud).
- **Priority 3: Hate Crime**

The Nuneaton and Bedworth CSP has two cross cutting themes for their priorities:

- **Drug and Alcohol Vulnerability**
- **Community cohesion**

The Council take seriously all reports of anti-social behaviour regardless of whether it is in a council owned, privately rented, owner-occupied property or community incident.

Due to the high level of crime, disorder and anti-social behaviour in Nuneaton and Bedworth, on 18 November 2022 the Borough held its' first ever Community Crime Summit. The summit brought together colleagues from the Council, and partners from Warwickshire Police, Warwickshire County Council, registered providers with housing in the borough, support providers and local charities who deal directly with, or who's communities are impacted on by incidents of crime, disorder and anti-social behaviour. It is recognised that by bringing partners together to develop effective multi-agency problem solving approaches it will help organisations better understand the root causes to enable them to tackle problems.

Below are two examples of how we are tackling the problems:

Town Centre Public Space Protection Orders: In September 2024 in response to increasing anti-social behaviour in Nuneaton and Bedworth town centres, and the public not feeling safe and avoiding the locations, the Council and Warwickshire Police launched a public consultation inviting peoples' views on their wish to introduce a Public Space Protection Order (PSPO) in the two town centres.

The Council and the Police both recognise the need to combat such behaviour through enforcement, diversion, and the Criminal Justice System. Forming part of the Council's wider enforcement and engagement strategy to reduce anti-social behaviour and disrupt criminality in the borough towns, the new PSPO will permit collaborative action to be taken against those committing anti-social behaviour in the towns centres and aims to build back public confidence in the community. The PSPO will enable the Council and the Police to effectively deal with any such suspected individuals.

In addition, to deter and deal with potential incidents and offer community reassurance. Warwickshire Police are aiming to introduce a new initiative called Operation Resolve, which commits a heightened officer presence to target areas where incidents have increased since 2023.

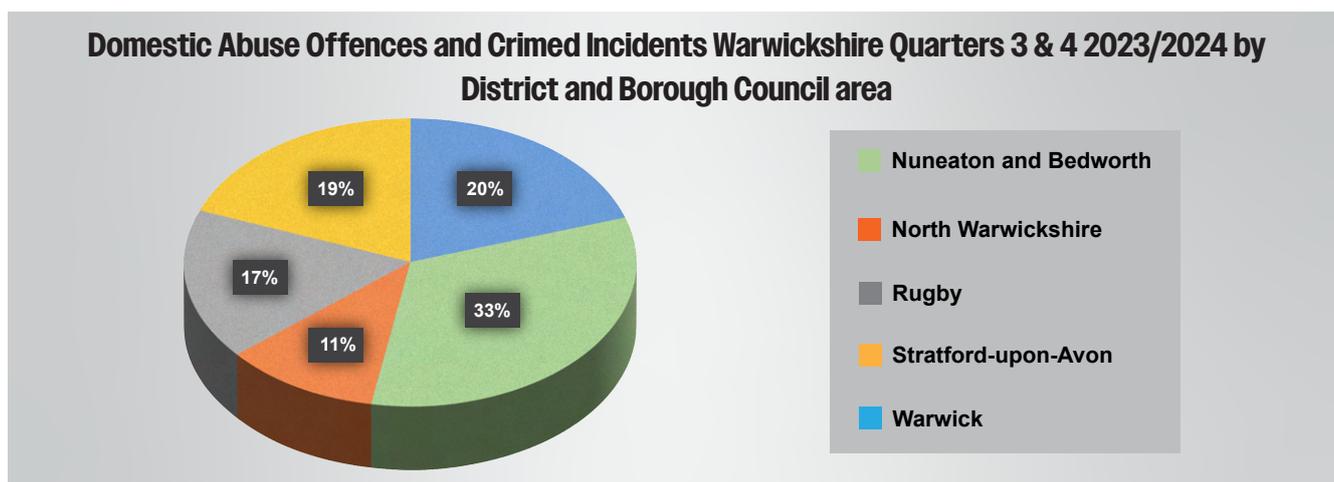
Raising awareness in schools: In 2024 in response to concerns about gangs and knife crime in the Borough, the CSP launched a virtual programme of sessions for local schools to raise young people's awareness of the dangers and consequences of carrying a knife and being a member of a gang.

It is acknowledged that causes of crime, disorder and anti-social behaviour can be complex, multi-faceted and go beyond the scope of any single organisation to understand and resolve. Often no one single partner has the solution, however by bringing partners together they can be more powerful and effective in their approaches and improve the safety outcomes for the communities of Nuneaton and Bedworth by reducing levels of crime and disorder.

The Council will continue to be proactive and collaborative in their approach and work together with our partners to resolve and reduce crime and anti-social behaviour and to rebuild the public's confidence in feeling safe in the communities in the Borough.

Domestic Abuse – Safe Accommodation

The number of domestic abuse offences and related criminal incidents reported to the police in Nuneaton and Bedworth continue to be the highest occurrences of domestic abuse incidents of all the district and borough councils in Warwickshire. In quarters three and four of the year 1 April 2023 to 31 March 2024 alone there were 1691 cases of domestic abuse offences and related criminal incidents in Nuneaton and Bedworth, this is more than 40% higher than in any of the other Warwickshire council areas for the same period and represents 33% of the total for the county.



The Domestic Abuse Act 2021 places a Safe Accommodation duty on Warwickshire County Council (WCC) to develop and publish a Safe Accommodation Strategy to provide an overall and holistic approach to deliver a rounded offer of support to victims in safe accommodation. As a tier 2 district and borough authority Nuneaton and Bedworth have a duty ‘to cooperate’ with the Domestic Abuse Act. The Act defines Safe Accommodation as “Solely dedicated to providing a safe place to stay for victims of domestic abuse including expert support”. For WCC to deliver there is a requirement for all District and Borough authorities to co-operate. The Council work with WCC and partners to achieve the five objectives of the Strategy including objective 3 to provide appropriate safe accommodation.

Appropriate Safe Accommodation

The council have provided and will continue to provide accommodation options and ensure appropriate support is in place for all victim-survivors who need it, such as refuge support, self-contained temporary accommodation, supported with sanctuary schemes (which is a multi-agency victim-survivor centred initiative which aims to enable households at risk of domestic abuse to remain in their own homes), provided permanent social housing.

Through our prevention of homelessness initiatives, we will continue to work in partnership with the private landlords in the Borough to provide suitable permanent housing to maximise the availability of housing options for victim-survivors.

HOUSING NEED IN THE BOROUGH

Housing Need

The number of households applying to join the Borough's housing register has continued to grow year on year over the life of the last housing strategy. The lack of affordable housing options in the private sector for people on lower incomes or those impacted on by the cost-of-living crisis has meant more people see social housing as their only housing option; coupled with the severe lack of availability of social housing has therefore seen the numbers of households on Nuneaton and Bedworth's housing register more than triple from around 1,200 in 2020 to over 4,000 in September 2024. This level of demand is the highest level seen ever and is reflective of the housing crisis faced by local authorities throughout the country.

Despite the number of new affordable housing dwellings built being substantial over the last 5 years, demand continues to outweigh supply. Below are details of the waiting list on 30 September 2024 and a table showing the number of properties allocated to households from our housing register in the year 2023/2024:

Housing Register 30 September 2024:

Nuneaton and Bedworth Borough Council Housing Register 30 September 2024							
Band vs Bed size	1 bed	2 beds	3 beds	4 beds	5 beds		
Band 1+	167	151	107	43	3		
Band 1+	231	202	122	33	9		
Band 2	1410	819	351	84	21		
Band 3	206	96	61	17	0		
Non-Priority	2	1	1	0	0		
Total	2016	1269	642	177	33	Total	4137

Allocations of social housing for the period 1 April 2023 to 31 March 2024: The table below shows the number of applicants on the housing register who were successfully allocated a property in the period 1 April 2023 to 31 March 2024 and their priority need banding. These are allocations to both the Borough's own council housing and to homes provided by registered providers. The second tables show the break down between council and registered providers

All Allocations 2023/2024:

ALL Allocations	Band 1+	Band 1	Band 2	Band 3	Total by Bed size
0 bed	6	19	21	3	49
1 bed	76	68	38	7	189
2 beds	130	58	35	3	226
3 beds	77	16	3	0	96
4 beds	9	1	0	0	10
Total by band	298	162	100	13	573

Breakdown of allocations 2023/2024

Council Dwellings:

NBBC	Band 1+	Band 1	Band 2	Band 3	Total by Bed size
0 bed	6	19	21	3	49
1 bed	51	57	30	7	145
2 beds	56	28	35	3	122
3 beds	33	8	3	0	44
4 beds	4	0	0	0	4
Total by band	150	112	89	13	364

Registered Provider allocations 2023/2024:

RP	Band 1+	Band 1	Band 2	Band 3	Total by Bed size
0 bed	0	0	0	0	0
1 bed	25	11	8	0	44
2 beds	74	30	0	0	104
3 beds	44	8	0	0	52
4 beds	5	1	0	0	6
Total by band	148	50	11	0	209

The level of allocations of registered provider properties to households from the Council's housing register is testament to the important role Registered Providers play in providing affordable housing provision in our Borough.

Homelessness and Rough Sleepers

The level of homelessness in the Borough remains high and we are again seeing an increasing number of people sleeping rough. In 2023 we carried out an in-depth review of homelessness and rough sleeping within the borough and in March 2024 we announced the latest Nuneaton and Bedworth Borough Council Homelessness and Rough Sleeper Strategy. This strategy sets out the priorities for tackling homelessness and rough sleeping for the next 5 years and reflects the wider social and economic causes and effects.

Through this strategy we want to build on the collaborative work we do by setting out our plans for the prevention of homelessness and our approaches to ensure that sufficient accommodation and support will be available for people who become homeless or who are at risk of becoming so.

Our aim is to better understand and address the underlying causes of homelessness and rough sleeping. This will enable multi-disciplined approaches for people with multiple/complex needs; collaborative wrap-around support for those who are at high risk of repeat homelessness, and to enable early interventions to prevent those at risk from losing their home.

Our Homelessness and Rough Sleeper vision: *To reduce homelessness in the Borough by providing information, advice, and early interventions to prevent those at risk losing their home. To support people who are homeless, to find a safe and secure place to call home and reduce the use of temporary accommodation. To end rough sleeping for good.*

Homelessness and Rough Sleeper Strategy 2024 to 2029 Priorities:

- **Priority 1:** To provide access to free housing advice and/or assistance to all who are homeless or facing homelessness.
- **Priority 2:** To enable homelessness prevention.
- **Priority 3:** To relieve homelessness at the earliest opportunity to enable suitable alternative accommodation for those becoming homeless.
- **Priority 4:** To Enable access to suitable and affordable accommodation that is sustainable, with support provided where appropriate.

We recognise the role our partners play and by working collaboratively with our statutory and third sector partners we aim to continue to develop a wide range of innovative solutions to effectively prevent and respond to those who are homeless or who are at risk of losing their homes, including the most extreme form of homelessness, rough sleeping.

Housing and Economic Development Assessment (HEDNA) 2022

In preparation for the emerging Borough Plan in 2021 the Borough commissioned IcenI to produce a borough specific HEDNA and in 2022 a sub-regional Coventry and Warwickshire HEDNA was produced which included evidence from the 2021 census.

A HEDNA is a joint and integrated assessment of the need for housing, economic growth potential, and employment land. It considers the overall housing need of an area, the types of homes needed, the dynamics within different sectors of housing and the specific housing needs of different groups within the population. It considers economic dynamics and growth potential and provides an evidence base assessment need for employment, land and premises.

The HEDNA assessment of need is intended to form part of the evidence base to inform the development of local plans. Evidence from the Borough's own, and the Sub Regional HEDNAs and supported by the independent IcenI report "Towards a Housing Requirement in Nuneaton and Bedworth", all clearly evidence the high level of need for social and affordable rented housing in the Borough. The current level of demand for social housing is evident from the council's growing housing register and demonstrates that the increasing need applies to all property sizes and will continue to exist until there is a substantial change in the affordability of homeownership and earnings levels in the Borough.

Within this overall need, evidence demonstrates that the most pressing requirement is for one bedroom accommodation, however the graph in the housing need section above illustrates there is also a high demand for 2-bedroom properties and for all other sizes of accommodation the demand far outweighs the supply, and this exists within all parts of the Borough. The ratio of prices to earnings means that for many people, even affordable homeownership options for example shared ownership are still unaffordable and the great majority of the housing need within the Borough can only be met by the provision of additional social rented units.

Ensuring the provision of new units of affordable social housing accommodation is therefore the greatest challenge facing the authority in meeting housing need.

Meeting the housing requirements of households with additional support needs:

There are households within the Borough who have additional requirements for their housing in order for them to live independently within the community. These adaptations and environmental considerations are wide and varied based on the individual and their level of need. This can range from property adaptations to support individuals with mobility challenges to soundproofing of properties to support individuals with sensory needs as two examples.

Although the commissioning of care and support services for individuals with additional support needs is the responsibility of Warwickshire County Council, the Council acknowledges the major role we play in encouraging and facilitating the development of specialist housing to meet the needs within the Borough.

We are committed to working with our internal and external partners to better understand the landscape of disability, and challenges faced by households in Nuneaton and Bedworth to be able to encourage the development of the specialised accommodation needed.

Disability:

According to the 2021 Census 8.5% of people living in Nuneaton and Bedworth identified as being disabled under the definitions of the Equality Act 2010 having conditions that limited their day-to-day activities a lot, and 10.9% with conditions that limited their day-to-day activities a little. Over 27% of households reported one person in their home was disabled and 7.9% of households reported having two or more disabled people in their household.

The Borough has the highest percentage of their population identifying as having a disability under the Equality Act out of the 5 local authority areas in Warwickshire; this equates to over 19,000 people living in Nuneaton and Bedworth classed as having a disability under the Act.

Disability Under the Equality Act	People Disabled under the Equality Act: Day-to-day activities limited a lot %	People Disabled under the Equality Act: Day-to-day activities limited a little %	People not disabled under the Equality Act %
Nuneaton and Bedworth	8.5%	10.9%	80.5%
North Warwickshire	7.6%	10.2%	82.2%
Rugby	6.2%	10.0%	83.5%
Stratford-on-Avon	5.3%	9.5%	85.2%
Warwick	5.6%	9.6%	84.8%

Lower tier local authorities	1 person disabled under the Equality Act in household %	1 or more people disabled under the Equality Act in household %	No people disabled under the Equality Act in household %
Nuneaton and Bedworth	27.0%	7.9%	65.1%
North Warwickshire	26.1%	7.2%	66.7%
Rugby	23.7%	6.1%	70.2%
Stratford-on-Avon	23.2%	5.5%	71.3%
Warwick	22.5%	5.3%	72.3%
England and Wales	25.6%	6.7%	67.6%

Specialist Supported Housing (SSH) and Extra Care Housing (ECH)

The Warwickshire County Council Market Position Statement (MPS) published in 2024 gives an overview of the predictions and projections of the needs of the County. The county use data produced by the Projecting Adults Needs and Service Information (PANSI) and Projecting Older People Population Information (POPPI) systems, and data produced by expert organisations for example the Alzheimer's Society to help inform and project the future service needs for services within Warwickshire. Many people will continue to live in their own homes with care and support provided however for those with higher levels of need specialist supported housing and extra care is needed.

The following are headlines from the Warwickshire Market Position Statement 2024 including predicted future levels:

Dementia: The Alzheimer's Society estimate that people living with dementia in Warwickshire will continue to rise; in 2020 it was estimated that approximately 7,760 people were living with dementia in the county, this is expected to rise to over 11,000 by 2030 and to around 14,000 by 2040 based on current trends.

Projecting Older People Population Information (POPPI) system Warwickshire 2020 to 2040:	2020	2025	2030	2035	2040
Number of people predicted to be living with dementia	24,560	25,325	25,841	26,369	26,948

Mental Health: People aged 18 to 64 years predicted to be living with mental health problems is set to rise from around 24,500 in 2020 to around 27,000 by 2040.

Learning Disability: People aged 18 to 64 years predicted to be living with severe or moderate learning disabilities are projected to rise from around 1,800 to 2,000 by 2040.

Moderate Care Need: People aged 18 to 64 years predicted to be living with moderate personal care needs is projected to rise from 13,800 in 2020 to over 14,500 by 2040.

Serious Care Need: People aged 18 to 64 years predicted to be living with a serious care need is set to rise from around 3,000 in 2020 to 3,200 by 2040.

Projecting Adult Needs and Service Information (PANSI) system Warwickshire 2020 to 2040 (Adults aged 18 to 64 years) predicted to have:	2020	2025	2030	2035	2040
A mental health problem	24,560	25,325	25,841	26,369	26,948
Moderate or severe Learning Disability	1,887	1,950	2,002	2,061	2,113
Moderate care disability need	13,854	14,414	14,451	14,614	14,756
Severe care disability need	3,045	3,150	3,172	3,183	3,260

Specialist Supported Housing (SSH)

Current Borough provision:

2020	No. SSH units WCC Nomination Rights	Total Number of units	Client Group
Sil 2 Beada House	16		Mental Health conditions.
Turville House	16		<ul style="list-style-type: none"> • Learning Disabilities • Autism, Physical Disabilities • Acquired brain injuries • Mental health conditions
Weavers Court	14	46	<ul style="list-style-type: none"> • Learning disability • Mental ill health • Autism

Current Pipeline developments of SSH:

2020	No. Units of SSH	NBBC Planning Status	Estimated Completion	Client Group
Heath End Road	10	Full Planning Permission	August 2025	Supported Living Vulnerable Persons
Atholl Crescent	16	Full Planning Permission	January 2025	Supported Living

EXTRA CARE HOUSING (ECH)

Current Borough provision:

Name	No. ECH units WCC Nomination Rights	Total Number of units
Oakwood Gardens / Mayfield Bungalows	60	60

Current pipeline ECH:

Name	No. units of ECH	NBBC Planning Status	Estimated completion
Manor Park	65	Full Planning Permission	2025/2026

Future Demand:

Extra Care Housing:

Using population data for Nuneaton and Bedworth, the County Council forecast that an additional 420 units of Extra Care Housing will be required in the Borough by the year 2040, with a current pipeline development at only 56 units this means there is a need for at least 360 additional units of extra care housing to meet the predicted demand. The Borough will continue to work closely with the Warwickshire County Council and development partners to encourage the building of the additional extra care housing need.

Specialised Supported Housing:

At the time of writing this strategy the County Council were working on gathering the information of future need for Specialist Supported Housing.

In their Market Position Statement, the County Council recognise the importance of working with their Planning and Housing partners, as well as those in Health, and Adult Social Care. Their aim is to integrate services to deliver high quality care and support in the right settings with a focus on minimising hospital admissions. This will include enabling care solutions through innovative technology by the development of digital platforms and assisted technology solutions to promote independent living.

Armed Forces and Veterans

The Armed Forces Covenant is about fair treatment. For most of the armed forces community, the Covenant is about removing disadvantage; so that they get the same access to services as the civilian community. The Armed Forces Covenant sets out the relationship between the nation, the government, and the armed forces. It recognises that the whole nation has a moral obligation to members of the armed forces and their families, and it establishes how they should expect to be treated.

Our Housing Solutions Team have a long-established, mutually supportive working relationship with Veteran Contact Point (VCP) in Nuneaton. We work collaboratively to find wraparound solutions to housing and preventing homelessness. We recognise the importance of the Armed Forces Covenant within our Housing Strategy, and how fortunate we are to have a VCP in Nuneaton.

All applicants completing our on-line application process for housing, are asked to identify if they are serving or former members of the armed or reserve forces. Once they identify themselves, they are automatically sent a digital support leaflet that give specific advice and important links to external services for the armed forces.

Our Allocation policy closely follows the statutory requirements for the armed forces to award additional preferences, placing them in the highest priority banding for housing, providing they meet the other eligibility criteria to join our waiting list.

Gypsies, Travellers, and Travelling Show People

The Housing Act 2004 and the National Planning Policy Framework places a duty on all local authorities to undertake regular assessments of the accommodation needs of Gypsies and Travellers either living in or resorting to their area. Whilst local authorities have the powers to provide, they are under no statutory duty to make provisions for Gypsies and Travellers.

Nuneaton and Bedworth recognise that the culture needs of Gypsies, Travellers, and Travelling Show People may differ from the rest of the population, and that it is important that consideration is given to culturally specific differences when considering residential provisions for the borough. The Borough Plan therefore considers the residential requirements of all parts of our community including specific provisions for Gypsies and Travellers.

According to the 2021 Census the number of people identifying as White: Gypsy or Irish Traveller ethnicity living in Nuneaton and Bedworth is 94 households.

In 2021 the Borough commissioned a new Gypsies, Travellers, and Travelling Show People Accommodation Assessment (GTAA), in 2016 the previous assessment concluded the GTAA must be refreshed every 5 years to ensure that pitch and pitch provision remains appropriate.

The Gypsy and Traveller Site Allocations 2023: NBBC Development Plan Document (DPD):

Vision:

The needs of the travelling community in and visiting the borough to be provided with sufficient pitches so that they can live, work, and rest in the borough. Pitches will be well located and integrated into the environment and local community thereby providing good access to essential services.

Objectives:

- **Objective 1** - To provide sufficient pitches for the needs of the travelling community.
- **Objective 2** - To provide provision in sustainable locations with good access to services.
- **Priority 3** - To provide provision in such a way that the local environment is protected and where appropriate enhanced.

PHOTO NEEDED

SOCIAL HOUSING

Allocating Housing: Housing Allocation Scheme:

The Council is required by Section 166A (1) of the Housing Act 1996 to have an allocation scheme for determining priorities and procedures to be followed when allocating social housing. The Nuneaton and Bedworth Borough Council Housing Allocation Policy aims to ensure that all social housing is allocated fairly and objectively to those in the greatest housing need, having regard to any legislative requirements and Codes of Guidance issued by both the Ministry of Housing, Communities and Local Government (Formerly Department of Levelling Up, Homes and Communities (DLUHC)) and the Regulator of Social Housing.

This scheme meets the requirements set out in Part 6 of the Housing Act 1996 and incorporates flexibilities introduced by the Localism Act 2011. In developing this scheme, the Council has had regard to guidance issued by the Secretary of State giving reasonable and additional preference to applicants in greatest need.

The key objectives:

- To operate a Choice Based Lettings Scheme that offers realistic informed choice for all.
- To improve and encourage a balanced and sustainable community.
- To ensure that every application is dealt with fairly and consistently irrespective of race, disability, gender, age, sexual orientation, gender reassignment, religion and/or belief, pregnancy/maternity, or marriage status.
- To operate a Choice Based Lettings Scheme that is simple, easy to understand, transparent, open, and fair.
- To give appropriate priority to applicants who fall within the 'Reasonable Preference' and 'Additional' categories as set out in Part 6 of the Housing Act 1996.
- To empower applicants by giving them more opportunity to express choice and preferences about where they want to live, whilst taking into consideration both the availability of housing resources and the high demand for housing.
- To assist those applicants who are vulnerable in accessing the lettings scheme.

We will continue to regularly review this policy to ensure that it is fit for purpose, compliant with statutory requirements and is reasonably practical. Due to the rising demand for social housing, it is important that we also regularly review this policy to ensure it is achievable and does not over promise the ability to house all those who apply for housing. This may include making difficult decisions and changes to our housing priorities to ensure those in the greatest need are considered first and could result in restricting those with low level housing need from applying for housing.

The Housing Register

The Housing Register is a single list of all the people who have applied to the Borough for housing. It includes both new applicants and existing social housing tenants who wish to transfer. The Borough as the Housing Authority has the powers to determine who is, or who is not eligible to apply to join the Housing Register. Social housing may only be allocated to a qualifying person.

The current Allocation Policy published in 2020 has four housing need bands based on the level of priority awarded to each applicant. An appropriate priority banding is given to each applicant based on their current personal and housing circumstances and the priority status as determined in housing and homelessness legislation and regulatory guidance. Below are the Boroughs priority bands at the time of writing this strategy 2024:

Housing Need Banding:

Band 1+: Highest housing need: Applicants assessed as having a priority and an additional preference.

Band 1: Urgent housing need: This banding is for applicants who are deemed to have an urgent need for housing.

Band 2: Priority housing need: Applicants deemed to have a priority need for housing with no statutory duty.

Band 3: Applicants whose circumstances are deemed low priority with no statutory duty.

Choice Based Letting:

The Borough uses a choice-based lettings system called NBBC Homes to allocate council and partner Registered Provider housing. NBBC Homes is the Council's platform for allocating properties to rent; it is also used for advertising available shared ownership. Properties that are available for rent are advertised daily.

Registered providers enter into a formal nomination agreement that sets the proportion of lettings they will make available annually to households on the Borough's housing register. Although we set these proportions, the majority of our registered providers no longer hold their own waiting lists and choose to advertise all vacant properties through our choice-based lettings system, this ensures local properties go to local people in the greatest housing need.

Within the nomination agreement Registered Providers are required to advertise 100 percent of any new build affordable housing properties when letting for the first time; this requirement includes shared ownership advertising, however these can also be marketed in the event that advertising on NBBC Homes fails to attract interest.

The Borough's New Build Local Lettings Plan

To ensure fair opportunity for all applicants on our waiting list to be able to bid for new build rented homes, the Council have a New Build Local Lettings Plan. The plan that has been in operation since 2019 confirms the process by which the Council's new build properties, and those of partner Registered Providers will be allocated. Applicants will use the Council's Choice Based Lettings system to register as normal and become LIVE applicants, they will be banded according to their housing need in line with the current Allocations Policy.

At the point of advert however, reference to this Local Letting Plan will come into play and a percentage of the properties advertised as follows:

- **40%** of units will be advertised for those applicants that are currently Council or Housing Association tenants needing to upsize, or downsize, according to their housing needs. (Transferring tenants)
- **30%** of units will be advertised for those applicants registered in Band 1+
- **0%** of units will be advertised for those in Bands 1 to 3 (inclusive)

Shared Ownership

The Borough does not hold a specific list of households seeking shared ownership; advertising these homes on first let gives the opportunity for those on the waiting list who are economically active but are unable to afford a property on the open market to secure a smaller mortgage and purchase a fixed share of a home rather than waiting for social housing.

Suspension of Advertising vacant properties

There are occasions when due to unprecedented numbers of homeless households occupying temporary accommodation; the Council will need to temporarily suspend allocations of vacant council properties for a period of up to three months. During this period households in temporary accommodation will be direct matched to suitable accommodation and only properties that cannot be directly matched will be advertised through NBBC Homes. The Council will continue to review the level of households in temporary accommodation to ensure that normal service can be resumed as soon as possible within the three-month period.

Best Use of stock

There is a limited supply of social housing within the Borough, and it is important that the Borough continue to look for innovative ways to ensure the best use of Council housing stock. Below are examples of how we are currently endeavouring to maximise the number of homes available to those on our waiting list and how we can support people who want to move home.

Right Sizing

In 2024 the Borough introduced an incentive scheme to encourage and support tenants under occupying family sized properties to “right size”. The aim of the scheme is to house people in homes that meet their household size, by providing them with practical support and financial compensation to free up much needed large family homes. The intention is for the rightsizing move to create a further chain of moves for people on our waiting list with the final property in the chain going to a homeless household.

Flexible tenancy

The number of four- and five-bedroom homes, and properties that have undergone substantial adaptation owned by the Council are small in comparison to the level of demand for these types of properties in the Borough; many are now also occupied by households who no longer need the property size or adaptations as their family’s needs have changed and grown-up children have moved on to their own homes.

It is important that we maximise the use of these homes and protect their availability in the future; the complete loss of these properties is also at risk if the existing tenants exercise their right to buy.

In order to protect this limited resource for the future, in 2024 we implemented the use of a flexible tenancy agreement introducing five-year fixed term tenancies for all new lettings of the Boroughs’ four, five and substantially adapted homes. The ability for councils to use flexible tenancy agreements was introduced in the Localism Act 2011.

Mutual Exchange

Is where two or more social housing tenants (Council, Housing Association, or other registered provider) legally swap homes. This is a vital housing option that enables thousands of tenants the opportunity to move to a property and place that meets their family's needs and aspirations.

With the limited availability of properties and the realism that only those with the highest housing need will secure an offer of accommodation it is important to have alternative housing options that provide choice and freedom to move both within and outside the Borough. The council provides access to a web-based platform (currently HomeSwapper). The platform enables tenants from all over the country to advertise and search for suitable homes to exchange with. It is the tenants' responsibility to find a person to exchange with and this site is visited by thousands of households looking to move without having to go through housing application and bidding processes.

Affordable Housing in Nuneaton and Bedworth

Build a Better Borough: Enable appropriate housing development.

Our residents deserve an excellent quality of life, fundamental to which is the homes that are available. We will seek to provide the right homes, with the right services in the right places, to meet the needs of our residents. This means homes that are affordable to both buy and rent, and which are good quality.

Council Housing Stock:

Despite the growing population and the increasing demand for social housing the number of council housing dwellings in the Borough has continued to decline year on year. On 31 March 2024 our total council housing stock was 5619 this is under half of the stock the Borough had before the introduction of the Right to Buy legislation introduced in 1980 when our council housing stock was just under 12,000. The table below gives a breakdown council housing by bedroom size:

Nuneaton and Bedworth Council Housing stock 31 March 2024:

Nuneaton and Bedworth Council Housing Stock 31 March 2024	0 Bed	1 Beds	2 Beds	3 Beds	4 Beds	5 Beds
General Needs	121	801	1618	1811	92	8
Independent Living	215	886	56	16	0	0
Totals	336	1687	1669	1827	92	8

General Needs dwellings by property type and number of bedrooms:

General Purpose dwellings	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	Total General Purpose
Bungalow	0	15	92	31	0	0	138
Flatlet	121	0	0	0	0	0	121
Flat	0	770	443	4	0	0	1217
House	0	16	833	1768	92	8	2717
Maisonette	0	0	245	8	0	0	253
Total No. Bedrooms	121	801	1613	1811	92	8	4446

Independent Living dwellings by property type and number of bedrooms:

Independent Living dwellings	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	Total General Purpose
Bungalow	0	368	47	2	0	0	417
Flatlet	215	0	0	0	0	0	215
Flat	0	518	9	8	0	0	535
House	0	0	0	6	0	0	6
Total No. Bedrooms	215	886	56	1811	0	0	1173

The lack of availability of affordable social housing, and the increasing reliance on the private rental sector for those who would normally have looked to buy a property is affecting rises in the level of private rents which is reducing the amount of affordable rental options available in our borough. Ending of private rented tenancies is already a main reason for homelessness, and we are seeing an increase in households having no option but to give up their private rented homes due to affordability.

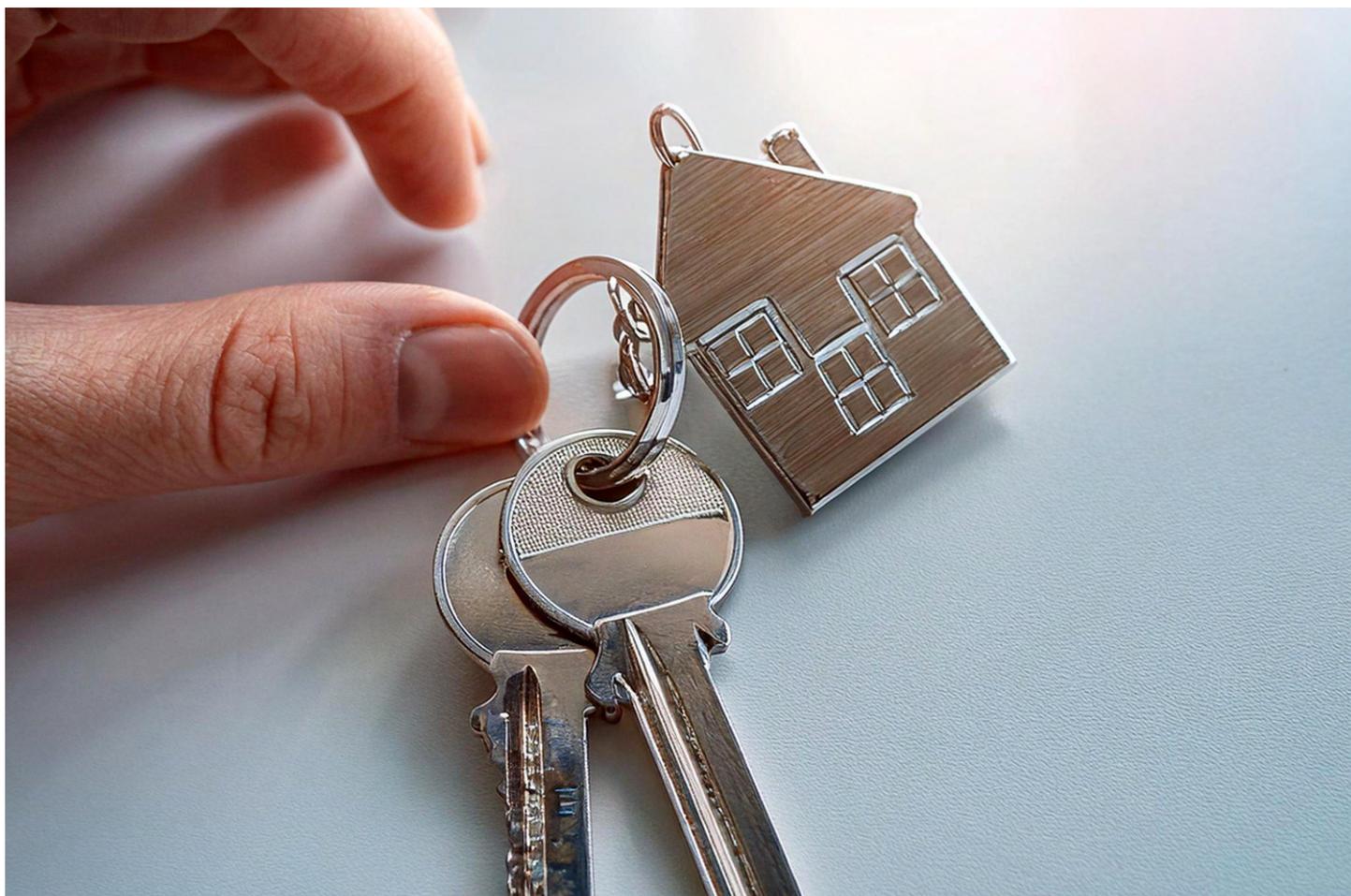
Despite a substantial building of new affordable homes, the demand for affordable rented housing continues to outweigh the supply. The Council have built 32 new Council homes built since 2018; however these do not compensate for the reduction in council housing effected by tenants exercising their right to buy; in the period 1 April 2018 to 31 March 2024, 192 Nuneaton and Bedworth tenants purchased their council home.

PRIVATE HOUSING SECTOR

Private sector housing accounts for 85% of the homes in Nuneaton and Bedworth; 68% of households are owner occupiers and 17% are privately rented tenants. Whilst the percentage of owner occupation reduced between the last two censuses, the private rented sector housing grew by over 5% making it the second tenure type in the Borough.

Under Part 1 of the Housing Act 2004, local authorities have a duty to keep housing conditions under review and to inspect if necessary to identify any actions needed in their local authority area. This Act introduced the Housing Health and Safety Rating System (HHSRS) which is used to identify hazards in a property and to classify the hazard by seriousness. In the case of identifying a Category 1 hazard, the local authority has a statutory duty to take action.

The Borough's Private Sector Housing Team aim is to improve and maintain the private sector housing conditions in Nuneaton and Bedworth.



Key Legislation:

- **Housing Act 2004 Part 1** – Introduced the Housing Health and Safety Rating System (HHSRS) for identifying hazards and specified the powers a local authority has to take action.
Lettings agents and property managers: redress schemes 2014 – from 1 October 2014 it is a legal requirement for lettings agents and property managers to join a government approved redress scheme.
- **The Smoke and Carbon Monoxide Alarm (England) Regulations 2015** – From 1 October 2015 landlords must install at least one smoke alarm on every storey in a rental property and a carbon monoxide alarm in every room when solid fuel is burning.
- **The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015** – set the minimum energy efficiency standards (MEES) stating that private rented properties must have an Energy Performance rating of E or above, initially only applicable for new letting of a property was extended to existing tenants from 1 April 2020 unless the property is included in a private rented sector exemption register.
- **Housing and Planning Act 2016** – including introducing new measures to tackle Rogue Landlords including:
 - Civil penalties as an alternative to prosecution for specified cases.
 - Extension to rent repayment order to cover more offences.
 - Data base for rogue landlords and lettings agents.
 - Banning order for serious or prolific offenders.
 - Regulations for electrical safety.
 - Classification on abandonment.
- **Licencing of Houses in Multiple Occupation (HMO) 2018** – removed the 3-storey or more requirement for HMOs to be licensed and replaced mandatory licencing for all HMOs with 5 or more people. Introduced a national minimum bed size for all new and renewed HMOs.
- **Homes (Fitness for Human Habitation) Act 2019** - introduced on 20 March 2019 the law aimed to ensure that rented homes (private and social housing) are fit for human habitation, healthy, safe, and free from serious harm. It enabled the tenant to act in court to enforce their landlord to carryout repairs and to pay compensation. This is not enforced by the council but is to empower tenants to hold landlords to account.
- **Electrical Safety Standards in Private Rented Sector 2020** – from 1 July 2020 for new tenancies and 1 April 2021 for existing tenants, all landlords of private rented accommodation are required to undertake an electrical inspection of the property every five years and to provide a copy of the report for the tenant occupies the property.

Private Rented Sector Housing

The Private Rented Sector has grown considerably over the last two decades throughout the UK and has become an integral part of the housing market. The continued growth in the private rented sector can be attributed to the rising costs of living and lack of affordability of homeownership; renting a home privately is an important housing option to many households who would have historically purchased their own homes. High quality private rented housing contributes to economic growth and social mobility and can provide affordable housing options for households on low incomes. The quality of some private sector housing has not kept pace with the demands of the modern housing market and the standards of properties offered at the lower end of the private rental market often fail to meet acceptable standards.

The Council play a crucial role in driving up the standards of private rented housing, we must focus on poor performing landlords but adopt a balanced approach for dealing with the issues of unacceptable standards of accommodation. We need to better understand our landlords' business model to be able to future proof our approach to meet the challenges of the changing nature of the private rented sector and support and encourage landlords to improve the standards of their accommodation.

We recognise that the majority of landlords do provide good standard property and service. Through our work with the private rented sector and the members of the Nuneaton and Bedworth Landlords Forum we have an established and trusting relationship with many of the landlords in our Borough, we are committed to working with our private rented sector landlords and lettings agents to ensure they understand their legal obligations and support and signpost them to resources and advice to enable them to manage their homes to a high standard.

Having the flexibility to work proactively with landlords and agents increases the ability to achieve positive outcomes whilst maintaining better relationships with the landlord, tenant, and community.

Challenges:

- PRS Stock condition intelligence.
- Disrepair including Housing Health and Safety Rating Category 1 Hazards.
- Reducing damp, mould, and condensation in private rented dwellings.
- Enforcement for rogue or disengaged landlords for disrepair and non-compliance with regulatory requirements.
- Tenants lack of awareness of their rights and failure to report poor quality landlords due to fear of being evicted.
- Landlords who fail or refuse to engage in improving energy standards.

Opportunities

- To encourage and enable private rented sector landlords and lettings agents to provide good quality, well managed properties in a professional way, by raising awareness of the rights and responsibilities of the tenant and landlords and by addressing the rogue landlords as necessary.
- To use our statutory position and enforcement powers where unavoidable to:
 - Improve the standard and management of the private rented sector homes.
 - Reduce number of Category 1 Hazards
 - Reduce damp, mould, and condensation occurrences.
 - Improve energy efficiency and reduce fuel poverty.
 - Reduce number of empty homes.

We will:

- Continue to review private sector housing in the Borough to identify hazards.
- Take appropriate actions and interventions to ensure the hazard is made safe including taking enforcement action as required.
- Continue identifying and tackling damp, mould, and condensation in private rented accommodation.
- Develop a policy response for resolving damp and mould hazards.
- To continue with reducing hazards through enforcement in the private rented sector and grant assistance.

Illegal and retaliatory Evictions

Private sector tenants should be free from harassment and improper eviction; they should be able to report repairs or problems without fear of their landlords serving them with a notice to quit as a result of reporting an issue, if the landlord retaliates by serving a notice to quit this is called a retaliatory eviction.

If a tenant reports their landlord and suspect that their eviction is illegal or retaliatory, the Council Private Sector Housing Team will review the circumstances of the notice to quit served and if the tenant has acted reasonably and had reported their repairs to the landlord will issue an enforcement notice to postpone the notice.

Challenges:

- Landlords misusing the “no fault eviction notice”, Section 21 notice in retaliation.
- Tenants lack of awareness of their legal rights to report landlord and prevent eviction.
- Tenants fear of retaliation from landlord.
- Quality of landlord service and their failure to accept responsibility for repairs.
- People at risk of becoming of homeless approaching the council in time to prevent eviction.

Opportunities - We will:

- Raise awareness and promote the legal rights of the tenant to report landlords who fail to repair and maintain their homes.
- Take immediate action to encourage the landlord or lettings agent to withdraw the notice and rectify the repair problem(s).
- Take formal enforcement action on those landlords and lettings agents that fail to rectify problems and serve notice where appropriate to prevent evictions.
- Actively seek out poor quality and rogue landlords who refuse to keep their homes in good repair and have a history of using retaliatory notices and utilise the statutory powers we have available to us to deal with them, adopting a strong enforcement policy, and use our powers to disrupt their activity so that they leave the sector.
- Take necessary legal actions including the imposing of civil penalties and/or court proceedings.

Improve the property conditions in the private sector

Challenges:

- Lack of knowledge about the state of repair within the private sector.
- Owner occupied homes that have not been maintained or kept in good repair.
- Owner Occupiers who are unable to or fail to keep their home in good repair, and who are considered vulnerable due to age, disability or health.
- Negative impact that properties in disrepair have on local communities.

Opportunities:

- To raise awareness and promote the services available to support vulnerable people to repair their home.
- To promote and support people who are vulnerable and whose homes are in need adaptations to access help through the Disability Facilities Grants.
- Continue to engage, encourage, and enable owner occupiers to repair and maintain their homes to a good standard by focussing on improving the owner-occupied properties that have not been maintained or kept in good order by raising awareness of the services and support available to owner occupiers who are struggling to maintain their home.

Energy Efficiency and Fuel Poverty

From April 2018 the Governments Minimum Energy Efficiency Standards or (MEES) Regulations came into force, setting a minimum energy efficiency level for all domestic private rented properties in England and Wales. The regulations aim to improve the quality of private rented buildings and to increase energy efficiency and improve the thermal comfort and conditions in the private rented sector and reduce fuel poverty.

Originally in force for new lettings only, these regulations were extended on 1 April 2020 to cover all relevant properties even if there has been no change of tenancy. Landlords with properties assessed at an Energy Performance Certificate (EPC) rating of F or G, must now improve the property rating to E or register an exemption if they want to continue to let it.

Landlords should review the recommendations in their EPC that suggest ways to improve the property's rating which may include:

- Boiler replacement
- Installing thermostatic radiator valves
- Upgrading and installing loft installation
- Installing cavity wall insulation
- Installing energy efficient light bulbs

There are circumstances where a property will become exempt from the regulations, the landlord must register the exemption and provide supporting evidence. Exemptions are defined as:

- High-cost exemptions
- Seven-year payback exemptions
- All improvements made exemptions
- Wall insulation exemptions
- Consent exemptions
- Devaluation exemption
- New landlord exemption

Challenges:

- Knowledge of private rented sector properties with EPC ratings below required standard.
- Lack of tenant awareness of EPC rating requirements.
- Tenants' willingness to accept properties with sub-standard EPC's due to being only accommodation option available.

Opportunities:

Improving the energy efficiency of housing in Nuneaton and Bedworth including private rented sector housing is a key health priority for the Borough. We aim to improve energy efficiency in the private rented sector by:

- Securing funding for the delivery of improvements in thermal efficiency of private sector housing stock and aim to deliver improvements.
- Creating a domestic energy efficiency strategy to improve the efficiency of private sector properties which will establish a baseline for the Borough.
- Improving the energy efficiency of private rented housing by promoting and enforcing the Minimum Energy Efficiency Standards (MEES)

Empty Homes

An empty home is a property that is privately owned and has remained unoccupied for six months or more. Empty homes fall into the categories below:

- Empty, in poor condition and/or causing community problems.
- Empty and maintained.
- Second homes

We recognise the impact empty properties can have on a community, as well as being a waste of a much-needed resource, empty properties can present health and safety risks and become a magnet that attracts unwanted anti-social behaviour that can impact negatively on the image and values of a neighbourhood.

In line with our Empty Homes Strategy, we will investigate reported empty homes and work with the owners to bring these properties back into use as quickly as possible. We will endeavour to be proactive in our approach and work with the owners, however where the owners are unable or unwilling to take the necessary actions to re-use the property we will utilise and deploy the statutory powers we have to resolve the problem.

The Borough's Empty Homes Strategy was under review at the time of writing this Housing Strategy and not due to be finalised before the publication of this document.

Supported Housing (Regulatory Oversight) Act 2023

At the time of writing this strategy the regulation and standard had not been announced. This Act will place regulatory oversight duties on the Borough and are outlined in the legislative changes section.

Private Sector Landlords

Housing Solutions Support Scheme

One of the main hurdles for prospective tenants is that they are unable to afford to access private rented accommodation. Nuneaton & Bedworth Borough Council's Housing Solutions Support Scheme is designed to help overcome this problem, and to encourage more landlords and agents to take on tenants who are struggling to find affordable rented homes.

The scheme works by assisting eligible customers and properties with a bond and/or rent in advance paid directly as a one-off grant to the landlord to help secure the property.

This has worked successfully over the last few years helping many clients to enter the private rented sector. The Council has, however, recently noticed a decrease in landlords willing to accept our customers, which has been attributed to several reasons:

- There is currently a very high demand for rental properties, and landlords are accepting working tenants rather than tenants who claim Universal Credit as they perceive the latter group to be higher risk.
- A lot of the properties used in the past for the Scheme still have the same tenants many years on. Though it is good that these tenancies have been sustained it reduces the number of properties that are available coming onto the market.
- Landlords have been exiting the sector due to increased regulation and mortgage costs.
- Less stock is available on the market driving up rents and making these unaffordable for our customers on Universal Credit.

In response to this, the Council also now has a designated Homelessness Prevention Service.

Our dedicated team of Homelessness Prevention Officers strive to avert homelessness for all housing situations by collaborating with landlords who may be contemplating issuing a notice, and tenants who are at risk of losing their homes.

We emphasise the significance of early intervention in working with both parties to prevent homelessness and any possible evictions.

By engaging with landlords and tenants, we aim to address any concerns before a notice is served or in the initial stages of an eviction notice, with the goal of maintaining the tenancy whenever feasible, and providing help to secure alternative housing if necessary.

The Housing Solutions Support Scheme supports this team by providing funding options to help people remain in their properties such as clearing rent arrears or covering shortfalls in rent where our criteria is met and the tenancy can be sustained, and this is assessed on a case-by-case basis.

Landlord Forum and newsletter

Nuneaton & Bedworth Borough Council has a well-attended Landlord Forum which is open to all private sector landlords and letting agents working within the Nuneaton and Bedworth area. It is held up to four times a year working in partnership with the National Residential Landlords Association.

The forum aims to:

- Provide a platform on which landlords and agents can share their experiences of letting accommodation, both with each other and with the Council.
- Help landlords provide good quality accommodation in Nuneaton and Bedworth.
- Increase awareness of changes in legislation, procedures, and policies.
- Respond to landlords concerns and needs.
- Encourage landlords to work more closely with the Council and to exchange ideas and information, so that we can learn from each other.

The Council also produces an electronic newsletter to engage with the rented sector on current updates and information relating to the private rented sector.

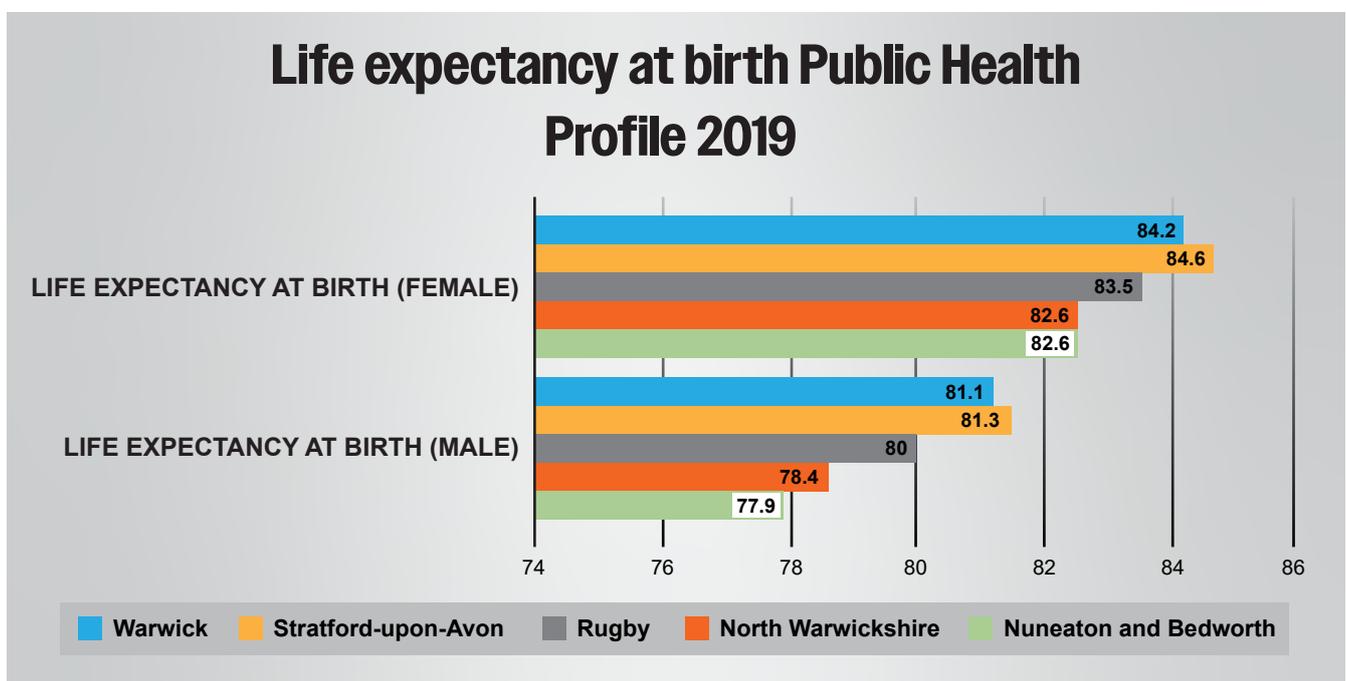
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HEALTH AND HOUSING

The Inequality in Life Expectancy from Birth across Warwickshire shows that on average females in the least deprived areas of the County are likely to live 6.3 years longer than those in the most deprived and is as high as 8.3 years in males.

Given Nuneaton and Bedworth has the most deprived Local Super Outputs Areas (LSOA) in Warwickshire, this demonstrates a significant health inequality for our residents compared to the rest of the County.

Chart below shows the comparisons between the life expectancy at birth between the 5 Warwickshire council areas:



It is well researched and documented that Wider Determinants of Health impact on an individual's ability to enjoy good health; housing is just one of those determinants and for obvious reasons, good quality, warm, and affordable homes are essential for maintaining good health and wellbeing.

To take just one aspect, where issues such as damp, mould and condensation and structural defects exist, things like fuel poverty kick in, the affordability for families to keep their homes warm will sometimes mean they have to make decisions on whether to "Heat or Eat"; often meaning they have to decide whether to keep their home warm and other necessities like food take second place, or vice versa both resulting in a detrimental impacts on physical and mental health potentially.

Evidence has been well documented around excess winter deaths as a direct result of low thermal efficiency of housing and low indoor temperatures.

Of the total excess winter deaths in the UK caused by fuel poverty and cold homes- 30% are due to cold housing conditions, and 10% directly linked to fuel poverty.

Children growing up in cold and damp homes with inadequate ventilation have higher than average rates of respiratory infections and asthma, chronic ill health, and disability. For older people, living in cold temperatures increases the risk of strokes and heart attacks.

Respiratory diseases, including flu are more common, as are falls, injuries and hypothermia because cold negatively affects dexterity.

The Director of Public Health's Annual Report 2022: "Health and the High Cost of Living in Warwickshire" paints a stark picture of the current health and wellbeing of residents in Nuneaton and Bedworth when compared to the rest of Warwickshire, particularly the South of the County. Reviewing the Wider Determinants of Health through the scope of the rising cost of living has shown how the economic issues we are facing is also a public health concern due to the impact on people in terms of things like fuel poverty, food poverty and nutrition, mental-health, and general access to timely and good quality healthcare.

In summary the key recommendations are as follows:

Overarching

Local Authorities, NHS partners and other key organisations focus expertise and capacity on building an inclusive, healthy, and sustainable Warwickshire by:

- **Policy:** adopting and sharing learning from a Health in All Policies approach and using Health Equity Assessment Tool (HEAT) to reduce inequalities in health.
- **Surveillance:** agreeing a single view of raw data and identifying emerging trends to support a coordinated approach, targeted at those who need it most.
- **Workforce development:** through wellbeing support programmes that support staff during the rising cost of living and training and development opportunities.
- **Making Every Contact Count:** utilising every point of contact as an opportunity to support people through the cost-of-living challenges.
- **Access to Services:** consider opportunities to increase accessibility to healthcare services for those who will experience the impact of the rising cost of living most acutely.

Housing

Housing, planning and health leads work together to prevent ill health caused by poor housing and living conditions. This should include a commitment to preventing new homes from being built with an EPC rating of less than C and working with private and public landlords to ensure existing homes have an EPC of C or below and are damp and mould free.

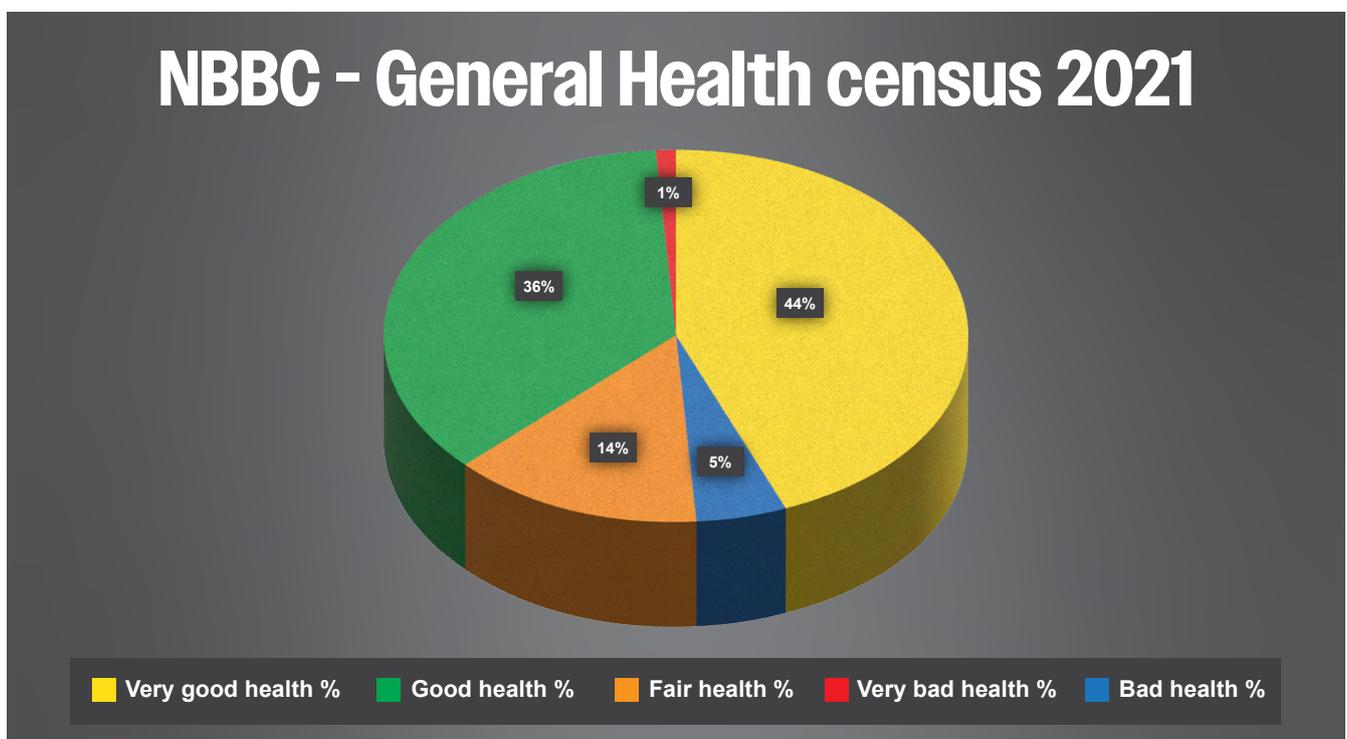
Food

To support children to have the best start in life, Health and Wellbeing Board explores the feasibility of free school meals for all primary school children in Warwickshire, as research shows that children can learn better in school if they have a full stomach.

Transport

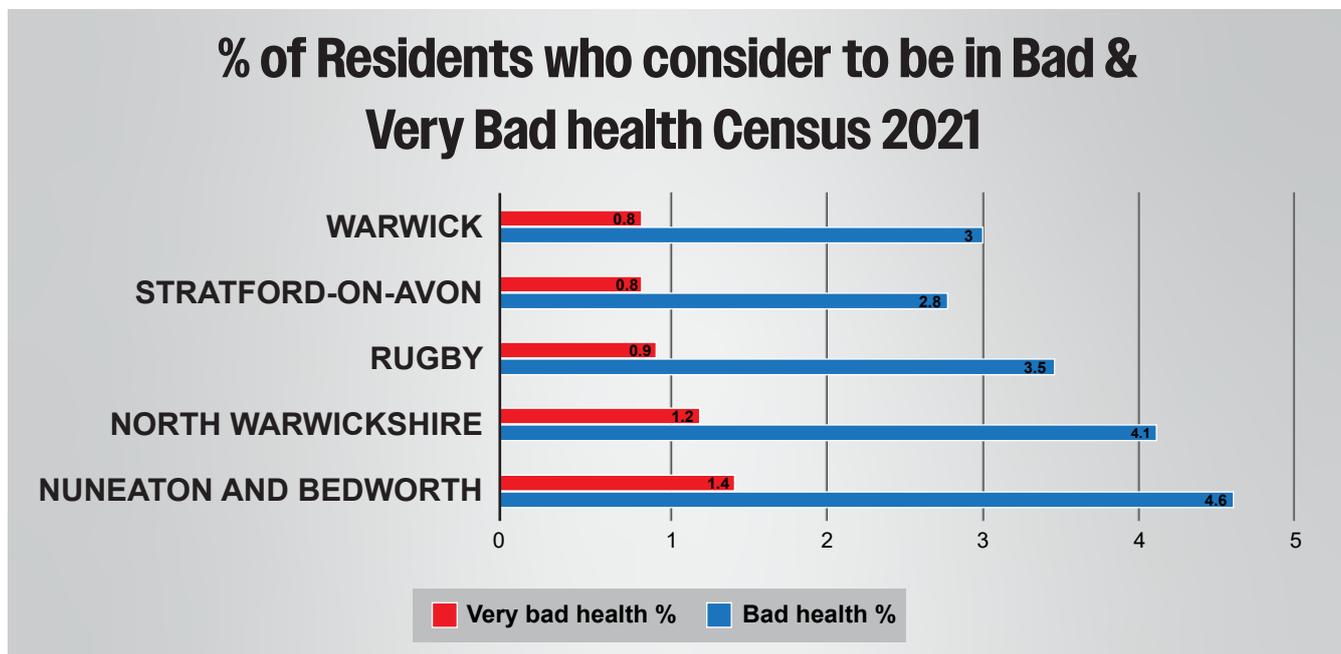
Transport planners and health partners work together to improve transport links for those living in areas with more rural isolation, deprivation and where rates of long-term conditions and access to transport links are poor.

Residents considered health condition Census 2021 all NBBC Wards:

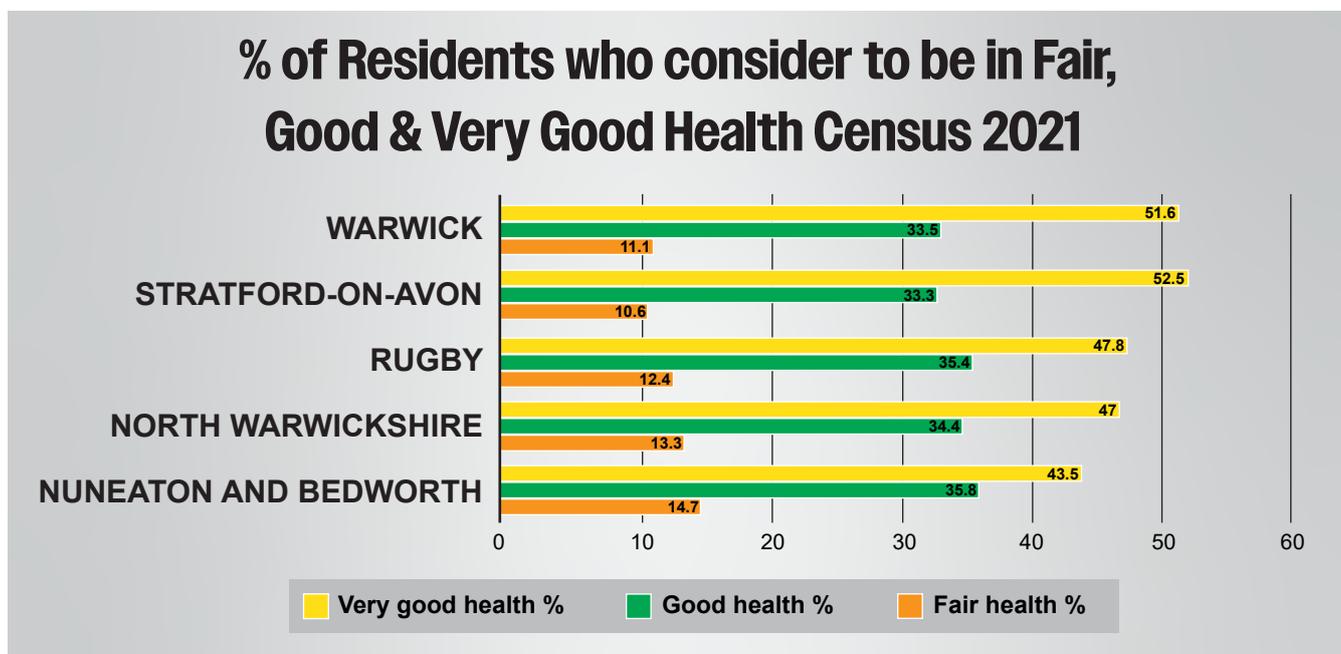


Residents considered health status Census 2021 Warwickshire comparisons.

Residents in Bad and Very Bad Health:



Residents in Fair, Good and Very Good Health:



Home and Environment Assessment and Response Team (HEART):

The HEART service provides assessments for, and delivery of, disabled facilities, adaptations, home improvement grants and home safety prevention work. It is a partnership service hosted by Nuneaton and Bedworth Borough Council on behalf of the other Councils in Warwickshire.

The service aims to maintain residents living independently in warm and safe homes and carry out preventative work to reduce accidents.

In turn this prevents housing crisis as residents are able to continue living independently, accidents are prevented, and health and safety is protected. This is especially true for the older residents who may end up in care, hospital or unsuitable housing following a general decline in ability, accident or housing related ill health. Although unlikely to become homeless in the traditional sense, it does help prevent the need to move from unsuitable accommodation into more expensive care or hospital settings.

The level of demand for adaptations has continued to grow as more people want to remain in their current home and live independently. HEART received 3,674 new cases between 1 April 2022 and 31 March 2023, and 3997 in 2023/2024. These figures are 30% higher than the number of new cases received in 2018/2019 figures. The demand from households in Nuneaton and Bedworth was almost twice as high as that from the other four council areas in Warwickshire.

HEART - New Enquiries 2022 to 2023

HEART new Enquiries 2022/2023	Total Enquiries 2022/2023	% of 2022/2023 Enquiries	Total Enquiries 2023/2024	% of 2022/2023 Enquiries
Nuneaton and Bedworth	1218	33%	1416	35%
North Warwickshire	578	16%	557	14%
Rugby	631	17%	655	16%
Stratford-upon-Avon	590	16%	670	17%
Warwick	657	18%	699	17%
Totals	3674		3997	

Approved Disability Facilities Grant (DFG) approvals for private sector households.

Disability Facilities Grant Approvals	2022/2023	2023/2024
Nuneaton and Bedworth	112	104
North Warwickshire	49	44
Rugby	45	43
Stratford-upon-Avon	95	76
Warwick	46	42
Warwickshire Totals	347	309

Referrals made to the local housing authorities for adaptations.

Local Housing Authority referrals	2022/2023	2023/2024
Nuneaton and Bedworth	105	142
North Warwickshire	66	62
Rugby	57	45
Stratford-upon-Avon	N/A	N/A
Warwick	59	101
Warwickshire Total	287	350

Completed DFG funded adaptations. Adaptation works completed included:

- Level access showers
- Stairlifts
- Building extensions

Disability Facilities Grant Completions	2022/2023	2023/2024
Nuneaton and Bedworth	108	95
North Warwickshire	45	51
Rugby	51	43
Stratford-upon-Avon	98	77
Warwick	50	40
Warwickshire Total	352	306

HEART also delivered:
• Home Safety interventions for minor adaptations:

Homes Safety Interventions	2022/2023	2023/2024
Nuneaton and Bedworth	167	372
North Warwickshire	79	132
Rugby	132	190
Stratford-upon-Avon	80	79
Warwick	75	85
Warwickshire Total	533	858

Warm and Safer Homes (WASH) grants:

Warm and Safer Homes Grants	2022/2023	2023/2024
Nuneaton and Bedworth	30	34
North Warwickshire	5	8
Rugby	9	9
Stratford-upon-Avon	2	3
Warwick	4	4
Warwickshire Total	50	48

In 2022/2023 Category 1 Housing Health and Safety Hazards removed as a result:

Removing 58 Category 1 Hazards	
Excessive Cold	35
Damp and Mould	12
Personal Hygiene	3
Structural collapse	4
Lighting	4
Electrical hazards	4
Warwickshire Total	56

Housing minor adaptations:

Housing Minor Adaptations Warwickshire 2022/2023	2022/2023	2023/2024
External handrail	25	48
Grab rails	148	187
Half Step	14	44
Half step (Home Safety)	32	0
Hand rail	141	154
Key safe	347	391
Steps	5	34
Warwickshire Total	712	858

Provided items of Social Care equipment:

Social care Equipment Provided Warwickshire	2022/2023	2023/2024
Half step	70	80
Toilet frame/raised seat	156	166
Perching stool	56	82
Commode	28	24
Bath board	42	33
Bed grab handle/rail	92	124
Shower seat/stool	166	194
Bath lift	25	40
Raisers chair	25	34
Minor works	30	19
Temp/portable ramp	17	15
Bath step	51	50
Mattress elevator	1	1
Leg lifter	6	2
Telecare	2	4
Other	66	65
Warwickshire Total	833	933

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Learning Disability and Autism

The Department of Health and Social Care (DHSC) define:

Learning disability: is defined as a significantly reduced ability to understand new or complex information, to learn new skills (impaired intelligence), with a reduced ability to cope independently (impaired social functioning), which started before adulthood.

Autism or Autism Spectrum Disorder (ASD): is defined as a neurological and developmental disorder that affects how people interact with others, communicate, learn and behave.

Learning disability and autism is different for every person, it is not a physical disability but is a lifelong condition and cannot be cured. The severity of learning disability vary and affect each individual in very different ways that range from mild to severe or profound.

A learning disability is something which affects the brain development this can be before or during birth or in early childhood, the cause can also remain unknown.

There are a number of conditions and neurological disorders that may cause or result in learning disability, including:

- Down's syndrome
- Autism
- Meningitis
- Epilepsy
- Cerebral palsy

The latest figures published by Mencap calculate that there around 1.3 million people with a learning disability in England and over 950,000 are adults aged 18 or over, it is estimated there are around 1,800 adults with severe learning disabilities living in Warwickshire, this is predicted to rise to over 2,000 by 2030.

Individuals with a learning disability have the same rights as anyone else, including being treated with respect and dignity and to have equal opportunities, to live satisfying and valued lives. The Equality Act (2010) places a statutory duty for employers, staff in healthcare settings and wider society to make reasonable adjustments to ensure an individual with a disability has equal access to services, by making changes in their approach or provision.

Health Inequalities:

LeDeR Compared to people without a learning disability, people with a learning disability tend to experience:

- Poorer physical health
- Poorer mental health
- Health inequalities

In 2021 the Learning from Lives and Deaths (LeDeR) a national service that examines the lives and deaths of people with learning disabilities and autism, reported the median age at death for people with a learning disability is 62 years, this is significantly lower than 82.7 years the median age of death for the general population. LeDeR also report that 49% of the deaths of people with learning disability could have been avoided and prevented with good quality healthcare, compared to 22% of deaths for the general population.

According to Mencap people with a learning disability are also less likely to be in employment, it is estimated that only 5.1% of adults with a learning disability in England are in paid work. They are also more at risk of:

- Living in poverty
- Experiencing extreme
- suffering bullying and discrimination

Children with learning disabilities:

Almost 68,000 children in England are identified as having a primary special educational need (SEN) associated with a learning disability or an education, health and care (EHC) plan, and only 26% of these children attend mainstream schools.

The British Association of Social Workers (BASW) summarises the health inequities determinants experienced by children with a learning disability in the UK:

As with adults with a learning disability, children and young people may also have additional physical and mental health needs. Family members will play a crucial role in advocating for their loved ones and can serve as a valuable resource for information when working as partners with professionals in health, social care and education.

For many their needs including housing will be the same as someone living without a learning disability; they are able to live full active lives, complete their education, be in paid employment, fully socialise and engage with society, and have successful relationships and families of their own.

The Council recognise they must listen to all people using their services including the housing needs and specific housing requirements of individuals with a learning disability. It is important that we understand how the living environment and housing impact on the lives of those living with a learning disability or autism including how it impacts on the individual adult, child and their families. The range of housing need for those with a learning disability is wide, it ranges from independent living in self-contained social housing to specialised supported housing with care and support. We will encourage the development of accommodation and work with Warwickshire County Council to meet these needs and ensure that our services are reasonably adjusted to be accessible and meet the specific needs of those who have difficulties using them.

COLLABORATIVE WORKING – WORKING TOGETHER TO PROVIDE HOUSING

We are proud of the relationship we have with our partners, and never underestimate how important collaborative working is for providing social housing in our Borough. The collaborative work and achievements are testament to how strong, and successful the relationship we have with both the statutory and voluntary sector partners is. It is important to acknowledge this relationship and thank our partners for the platform this has established on which we can continue to grow our relationships and shape future housing delivery in the Borough.

Our Partners and Stakeholders

The Council work with many agencies, both in the statutory and voluntary sectors. The excellent partnerships established over the years in the Borough have enabled the building of new homes and enabled us to adopt a multi-agency approach to housing in general, including tackling homelessness and anti-social behaviour. Without these partners and the excellent homes and services delivered by these organisations the Council would struggle to deliver affordable housing in the Borough.

It is important that we recognise the individual role and services provided by our partners that support the delivery of priorities within this strategy.

Warwickshire County Council

Warwickshire County Council (WCC) is the social services authority for the area and the commissioner of care and support and supported accommodation.

In 2021 the county council with the five district and borough councils in Warwickshire, co-produced the first ever Warwickshire-wide homelessness strategy: **Preventing Homelessness in Warwickshire: a multi-agency approach.**

Developed by the six councils and working in partnership with both statutory and voluntary organisations this strategy is important because it supports the district and borough council's own homelessness and rough sleeper strategies. It aims to address the broader underlying issues of homelessness and brings together the organisations working in those other policy areas to help to develop the way forward to reduce homelessness in Warwickshire.

The Preventing Homelessness in Warwickshire strategy is currently under review and is not due to be published until after the publication of this strategy.

Commissioning

The services they commission are for clients with support needs that place them on the edge of care, supporting them to maintain a tenancy and helping with issues that could lead to homelessness. Some of the services include short-term accommodation to support households who are homeless.

Public Health Warwickshire

Warwickshire County Council is responsible for the delivery of public health services for the county of Warwickshire, they lead on improving and protecting the health of the local population; they are responsible for commissioning key services that support the delivery of housing and services. The Borough are obliged to work with Public Health to ensure decisions are made to improve the health and wellbeing of communities.

Warwickshire District and Borough Councils

Nuneaton and Bedworth Borough Council is one of the five local authority areas in Warwickshire. We work in collaboration with our neighbouring authorities in many ways including developing county wide strategies and approaches; by sharing best practises and learning we aim to ensure that we maximise our opportunities to deliver social housing.

West Midlands Combined Authority

A combined authority is a legal body set up that enables two or more councils to collaborate and take collective decisions to improve the economies across their council areas. A combined authority is more robust than informal partnerships and means councils in combined authorities have greater powers and resources devolved to them from national government. They are locally owned and supported by their member councils, they are politically controlled and led by an elected Mayor and representatives from constituent authorities.

Nuneaton and Bedworth is a non-constituent member of the West Midlands Combined Authority (WMCA). The WMCA was formed in 2016 and consists of seven constituent authorities (West Midlands Metropolitan Borough Councils) who are deemed to be full members and have full voting rights; non-constituent authorities from neighbouring authorities, who have reduced voting rights but still play a vital role at board level and help to shape policy and drive the WMCA agenda. Local Enterprise Partners (LEPs), and Observer Organisations are also part of the combined authority; they have no voting rights but are able to influence the WMCA's work.

Constituent Authorities:

- Birmingham City Council
- City of Wolverhampton Council
- Coventry City Council
- Dudley Metropolitan Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
- Walsall Council

Non-constituent member authorities June 2024:

- Cannock Chase District Council
- North Warwickshire Borough Council
- Nuneaton and Bedworth Borough Council
- Redditch Borough Council
- Rugby Borough Council
- Shropshire Council
- Stratford upon Avon District Council
- Tamworth Borough Council
- Telford and Wrekin Council
- Warwick District Council
- Warwickshire County Council

Local Enterprise Partners (LEPs) June 2024:

- Black Country
- Coventry and Warwickshire
- Greater Birmingham and Solihull

Observers Organisations:

- Hereford Council
- Marches LEP
- West Midlands Fire and Rescue Authority
- West Midlands Police and Crime Commissioner

The membership above is correct at the date of publishing this strategy, however it is subject to change if members join or leave the WMCA.

The 2023 Devolution Deal with the government meant the WMCA had new funding and powers for investment and growth including directly overseeing affordable housing investment across the region. From 2025 the government will also pilot the devolution of housing retrofit funding with the West Midlands. Both of which will be important to the Borough.

The WMCA are working with partners to ensure the residents of the West Midlands region can benefit from investment that will create vibrant inclusive communities. The WMCA 2023 Prospectus details a range of important town centre regeneration projects including Transforming Nuneaton, the Boroughs' town centre regeneration programme that offers major investment opportunities for redevelopment and refurbishment aimed at creating a thriving, vibrant town including accommodation.

The Borough represents the non-constitution authorities on the WMCA Homelessness Taskforce, established in 2017 the taskforce is committed to bring together organisations, people and resources to tackle homelessness in the region. Working together enables wider understanding of causes of homelessness and is working towards designing out homelessness across the region.

PHOTO NEEDED

Homes England

Is an executive non-departmental public body sponsored by the Ministry of Housing, Communities and Local Government, it is the national housing and regeneration delivery organisation. Their role is to ensure that more people in England can have access to good quality homes in the right places. Working closely with their partners including local authorities, housebuilders, investors and developers they are responsible for the delivery of the Affordable Homes Programme 2021 to 2026.

They are currently fully responsible for the Affordable Homes Programme that provides grant funding to support the costs of building new affordable homes in England.

The Borough has worked closely with Homes England who have provided much needed financial support to enable the building of new council housing.

In September 2024 the Council saw the completion of 12 much needed two, three and four bedrooms houses at Byford Court. The new homes are on a former council housing a site made available from the demolition of difficult to let bedsits and enabled with financial support from Homes England. These new homes not only increase the Council's housing stock but more importantly they provide homes that are designed and equipped to be energy efficient with hydrogen ready boilers, solar panels, Showersaves and electric car charging points installed; they also contribute the environment with special bricks installed to encourage wildlife such as bats and birds to nest in the area.



Affordable Housing Programme post 2026:

From 1 April 2026 the West Midlands Combined Authority (WMCA) will be responsible for making key strategic decisions about the delivery and funding of affordable housing for the West Midlands which includes Nuneaton and Bedworth, including some of the decisions currently made by Homes England such as agreeing sites and providers. Homes England will continue to work in close collaboration with the WMCA and its authorities to ensure the building of affordable housing.

The Borough will continue to work closely and in partnership with both Homes England and the WMCA to maximise the opportunity to deliver affordable housing.

Registered Providers

We work closely with the registered providers in our Borough to ensure people on our housing list have maximum opportunity to access the homes they provide. Without their commitment to building homes in Nuneaton and Bedworth the Council would not be able to help households on our housing register to find affordable homes. It is important that we recognise the work they do not only in building much needed social rented homes but also their commitment to working with the Borough to provide homes that are affordable, safe, and warm in inclusive communities where people aspire to live.

We will continue to work closely with providers developing new homes to accelerate and maximise the delivery of properties that best meet the needs of our waiting list, this includes working together to determine the property type, bedroom size, and tenure mix that will best support local housing need.

According to the 2022/2023 Private Registered Providers Statistical Data Return (SDR) registered providers provide 3,800 homes in our borough; many of our providers have been providing homes in Nuneaton and Bedworth for over 20 years, whilst others are reasonably new and have started providing homes in the Borough since the last strategy. The Borough does not have a preferred registered provider and offers an open opportunity for other registered providers to deliver social and affordable housing in our area. Some of the larger RPs provide a variety of tenures within their stock, while others provide specialised housing for older people and/or supported housing for people who need specialised support to maintain or become independent.

Registered Providers in our Borough include:

- Anchor
- Bromford
- Citizen
- Clarion
- Derwent
- Housing 21
- MHA
- Midland Heart
- Orbit
- PA Housing
- Platform
- Sage
- Sanctuary
- Stonewater
- WHG Housing

Below are the details of the Registered Providers housing stock as of 31 March 2023:

Registered Providers of general-purpose homes, housing for older people and supported housing:

Provider	Number of dwellings	General Needs	Supported /Housing for older people	Low-cost home ownership
Midland Heart Limited	851	687	0	164
Orbit Group Limited	799	710	0	89
Bromford Housing Association Limited	378	321	20	37
Stonewater Limited	292	242	0	50
Citizen Housing Group Limited	271	205	0	66
Housing 21	199	0	174	25
Longhurst Group Limited	137	103	30	4
Platform Housing Limited	131	86	0	45
Anchor Hanover Group	124	0	124	0
PA Housing Limited	93	80	3	10
Clarion Housing Association Limited	72	50	0	22
Sage Housing Limited	68	50	0	18
Sanctuary Housing Association	36	36	0	0
MHA	34	0	34	0
Green Square Accord Limited	35	6	29	0
Heylo	27	0	0	27
Legal & General Affordable Homes Limited	19	14	0	5
Places for People Living+ Limited	17	11	1	5
Flint Housing Limited	7	7	0	0
Total number of Dwellings	3590	2608	415	567

Registered Providers who provide specialist supported Housing only:

Specialised / Supported Provider	Number of dwellings	Supported housing/ housing for older people	Low-cost home ownership
Inclusion Housing (CIC)	53	53	0
Bespoke Supportive Tenancies Ltd	44	44	0
Nicholas Chamberlaine's Hospital & Sermon	28	28	0
Golden Lane Housing Limited	22	22	0
Fairplace Homes Ltd	16	16	0
Advance Housing and Support Limited	15	11	4
Reside Housing Association Limited	13	13	0
Trinity Housing Association Limited	8	8	0
The Exaireo Trust Ltd	4	4	0
Falcon Housing Association C.I.C	2	2	0
IKE Supported Housing Limited	2	2	0
Westmoreland Supported Housing Limited	2	2	0
EMH Housing and Regeneration Limited	1	0	1
Totals	210	205	5

Developers

The majority of affordable homes developed in the Borough in recent years have been as a result of a Section 106 Agreements, also known as a developer contribution or planning obligations, a Section 106 Agreement is a legal contract between a local council and developers that forms part of the planning permission. Developers looking to develop homes on Section 106 sites are required to provide at least 25% of the dwellings they build as social or affordable housing for rent or low-cost homeownership. The tenure proportions between rented and low-cost homeownership are determined according to the Boroughs' housing needs and are detailed in our Affordable Housing Supplementary Planning Document (see below)

Since our last Housing Strategy to the end of March 2024, 1395, new affordable homes have been built; 845 social and affordable rented, and 550 affordable home ownership, including 51 First Homes.

Affordable Homes Completions 1 April 2017 to 31 March 2024							
Year	2023/24	2022/23	2021/22	2020/21	2019/20	2018/19	2017/18
Affordable Rent	280	127	116	57	110	103	52
Affordable Home ownership	187	88	59	67	36	33	29
First Homes	20	31	N/A	N/A	N/A	N/A	N/A
Total Affordable	487	246	175	124	146	136	81

Source: NBBC Planning Policy and Homes England

The Borough has a proactive approach to working with developers large and small; we will continue to welcome and encourage early dialogue with our developing partners to ensure the social and/or affordable homes they propose and develop are the of right size and property type to meet the current housing needs of the Borough.

Affordable Housing Supplementary Planning Document

Local authorities are allowed to provide affordable homes by requiring developers to deliver them as part of new housing developments. The emerging Borough Plan policy H2 Affordable Housing sets out the council's planning policy approach for affordable housing requirements.

The requirement to provide affordable housing should be considered at the start of the development process, and developers should not expect the requirement to provide affordable housing to be waived at any stage.

The Affordable Housing Supplementary Planning Document (SPD) provides further details on Affordable Housing that are material considerations when determining planning decisions. This includes the governments' current policy towards affordable housing as determined in the National Planning Policy Framework (NPPF), and requires local planning authorities to:

- Reflect the needs of different groups in the community who require affordable housing.
- Specify the type of affordable housing required, which should normally be expected to be delivered on site, unless off site provision or a financial contribution can be robustly justified.
- Seek affordable housing, in most cases, only on major residential developments.
- Support the re-use of brownfield sites by reducing affordable housing contributions by a proportionate amount.

NABCEL (Nuneaton and Bedworth Commercial Enterprise Ltd)

Formed in 2013, NABCEL is the commercial arm of Nuneaton and Bedworth Borough Council. NABCEL provide accommodation and property-related services across Nuneaton, Bedworth, and the West Midlands. NABCEL offer a range of property services including:

- Gas and electrical works
- Property lettings
- Management of temporary accommodation
- Extensive cleaning services
- Gardening works
- Building surveying and consultancy

Third Sector, charity and community Partners

At the time of this strategy, we work with:

- **Doorway:** is a Nuneaton based charity for homeless young people aged 16 to 25 years in Warwickshire. Their organisational vision is *“to prevent youth homelessness and minimise its impacts by ensuring that all young people have a safe and secure place to live, a productive fulfilling purpose, positive relationships with others and good health to enjoy them”*.
- **P3:** is a national registered charity, with offices in Nuneaton; P3 carry out vital work with people aged over 25 who are homeless or likely to become homeless. They provide floating support services to prevent homelessness before it happens by working with people whose accommodation is at risk.
- **St Basils:** is one of the largest organisations in the country working with young people who are homeless. A registered charity and a registered provider of social housing they provide a range of accommodation and support services to young people aged 16 to 25 years who are homeless, vulnerable or at risk.
- **CGL:** working with those with addictions can be evicted from their homes if they prioritise the funding of an alcohol or drug habit, over paying for their rent or mortgage. Anti-social behaviour due to addiction can also cause them to lose their social or private sector tenancy.
- **Together:** is a national registered charity; Together Warwickshire provides housing related support to people with disabilities which includes, physical and learning disabilities, mental health, sensory impairments, and autism, supporting people aged 16 years and over.

- **Refuge:** is a national charity providing specialist support for women and children experiencing domestic violence. The largest domestic abuse organisation in the UK, on any given day their services support thousands of women, and their children, helping them to overcome the physical, emotional, financial, and logistical impacts of abuse and rebuild their lives free of fear.
- **Veteran Contact Point:** is a charity that is run by Veterans of the armed forces to support those Veterans who are facing additional barriers, and to ensure that they are not forgotten.
- **Salvation Army:** The Nuneaton Salvation Army offer a range of services for those experiencing homelessness including those rough sleeping including drop-in sessions with hot meals provided.
- **Local Church centres**
- **Nuneaton Foodbanks run by the Trussell Trust**

Wider representation

In addition to the remit of various posts and roles within the Council, the Housing and Community Safety Directorate plays an active part in county-wide and sub regional fora.

Examples of NBBC Housing representation include:

- West Midlands Combined Authority Homelessness Taskforce
- West Midlands Housing Officers Group
- Warwickshire Heads of Housing
- Warwickshire Housing Partnership Group
- Warwickshire Strategy Officers Group
- Nuneaton and Bedworth Private Sector Landlords Forum
- Warwickshire Migration/Resettlement partnership
- Warwickshire Better Together (Housing) Group
- Warwickshire Public Health
- Warwickshire North Health and Wellbeing Partnership
- Warwickshire Safe Accommodation
- No Second Night Out

To name but a few ... these fora serve to consider, consult, and develop best practice initiatives in housing. Sharing of good practice and learning from other organisations to maximise the potential to deliver social housing.

STRATEGY PRIORITIES 2024 TO 2034

<p>Priority 1: Maximise the delivery and availability of affordable housing.</p>	<p>Encourage and maximise the delivery and availability of affordable rented homes to meet the needs of the Boroughs' growing population, and to reduce homelessness and end rough sleeping for good.</p>
<p>Priority 2: To make best use of the borough's existing and future housing stock.</p>	<p>To regularly look for initiatives to ensure the residents can access to the right size and type of housing, including adaptations and adapted properties.</p>
<p>Priority 3: To improve the quality of housing, including improving energy efficiency and tackling damp and mould in public and private sector dwellings.</p>	<p>To continue to improve the quality of the council housing stock, and to work with private sector homeowners and landlords to support them to access the support needed to ensure their homes are maintained to a good standard.</p> <p>To support landlords and tenants in the private rented sector to understand their legal rights.</p> <p>To actively reduce the prevalence of damp, mould, and condensation, in both council housing and the private housing sectors.</p> <p>Improving council owned stock by adhering to the BS PAS 2035 and any subsequent sector guidance and by adopting a whole house approach to retrofitting improvements.</p> <p>Being innovative in our approach to energy efficiency measures, by including measures in the design specification in the new homes we build.</p>
<p>Priority 4: Reducing the health inequalities and barriers faced by households in housing need.</p>	<p>Working with partners to better understanding the health profile of the Borough and to address the impact housing has on individuals' health and wellbeing.</p> <p>To work with partners to ensure people can access housing that meets their needs.</p>
<p>Priority 5: To promote community safety in existing and future housing communities.</p>	<p>To work collaboratively with our partner organisations to better understand the causes of crime, disorder and anti-social behaviour, to develop effective multi-agency approaches to improve the safety outcomes for the communities of Nuneaton and Bedworth.</p>

Name of Policy/Procedure/Service	NBBC Housing Strategy 2024 to 2034
Service Unit	Strategic Housing
Date of Implementation	TBC

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

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

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

Green

Recommendations (If any):

<p>No adverse impact has been identified within the document.</p> <p>Some protected characteristic groups are highlighted within the document in order to provide further support where necessary/applicable with housing.</p>
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Signed	<i>C. Dicken</i>
Officer completing assessment	Craig Dicken
Date	9 th October 2024



Public Health
England

Protecting and improving the nation's health

APPENDIX C

Health Equity Assessment Tool (HEAT):

Full version

About Public Health England

Public Health England exists to protect and improve the nation's health and wellbeing, and reduce health inequalities. We do this through world-leading science, research, knowledge and intelligence, advocacy, partnerships and the delivery of specialist public health services. We are an executive agency of the Department of Health and Social Care, and a distinct delivery organisation with operational autonomy. We provide government, local government, the NHS, Parliament, industry and the public with evidence-based professional, scientific and delivery expertise and support.

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About HEAT

What is HEAT?

HEAT is a tool consisting of a series of questions and prompts, which are designed to help you systematically assess health inequalities related to your work programme and identify what you can do to help reduce inequalities. It will also help you to consider the requirements of the Equality Act 2010.

When and why should I use it?

HEAT has similarities to other health equity assessment tools, but is unique in providing a lightweight yet still systematic framework for assessing and driving action on health inequalities.

It provides an easy-to-follow template which can be applied flexibly to suit your work programme. Its specific prompts ensure consideration of multiple dimensions of health inequalities.

How is it structured?

The tool has 4 stages:

1. Prepare
2. Assess
3. Refine and Apply
4. Review.

It is designed to be completed at the start of a work plan to help you consider its potential effects, but it can be used retrospectively. In practice, your assessment is likely to be iterative and will help you continuously improve the contribution of your work to reducing health inequalities.

Because tackling health inequalities at scale is likely to require 'buy-in' from senior leaders in your organisation or the system you work in, we recommend that the use of the HEAT process is sponsored by a senior leader.

What should be considered when completing it?

There are a number of different dimensions or characteristics to consider when completing HEAT.

1. The protected characteristics outlined in the Equality Act 2010 are as follows:
 - age
 - sex
 - race
 - religion or belief
 - disability
 - sexual orientation
 - gender reassignment
 - pregnancy and maternity
 - marriage and civil partnership
2. Socio-economic differences by individual socio-economic position. For example, National Statistics Socio-economic Classification, employment status, income, area deprivation.
3. Area variations by deprivation level (Index of Multiple Deprivation), service provision, urban/rural or in general.
4. Vulnerable and Inclusion Health groups, for example people experiencing homelessness, people in prison, or young people leaving care.

What should be considered when completing it?

Health inequalities are unjust differences in health and wellbeing between different groups of people (communities) which are systematic and avoidable. Health inequalities in England exist across a range of dimensions or characteristics, including the nine protected characteristics of the Equality Act 2010, socio-economic status, geographic deprivation, or being part of a vulnerable or Inclusion Health group.

Health inequalities may be driven by:

- 1 Different experiences and distribution of the wider determinants of health or structural factors. For example, the environment, community life, income or housing. In other words, the social economic and environmental conditions in which people live, work and play.
- 2 Different exposure to social, economic and environmental stressors and adversities. These affect states of mind from an early age and throughout life. Stress and psychological wellbeing directly affect resilience, health conditions and health behaviours.
- 3 Differences in health behaviours or other risk factors between groups, for example smoking, diet, and physical activity levels have different social distributions. Health behaviours may be influenced by wider determinants of health, like income.
- 4 Unequal access to or experience of health and other services between social groups.

People who share protected characteristics, as defined in the Equality Act 2010, may experience poorer health outcomes as a direct result of discrimination or due to different experiences of the factors described above.

The tool

Programme or project being assessed	Housing Strategy
Date completed	April 2024
Contact person (name, Directorate, email, phone)	Joy Smith, joy.smith@nuneatonandbedworth.gov.uk 02476 376484
Name of strategic leader	

Steps to take	Your response – remember to consider multiple dimensions of inequalities, including protected characteristics and socio-economic differences
A. Prepare – agree the scope of work and assemble the information you need	
<p>1. Your programme of work What are the main aims of your work? How do you expect your work to reduce health inequalities?</p>	<p><i>The main aim is to develop a Housing Strategy for the next 10 years that will present stakeholders and interested parties with the housing needs landscape for our Borough. The document will be able to be used as a single point of information for developers looking to build homes in the borough, statutory and third sector agencies needing to understand the various socio-economic issues present in the area in order to better plan for their service demands, colleagues in internal and external Local Authority departments needing data to support their decisions, and anyone needing to understand the Housing Needs, and why they exist in Nuneaton and Bedworth.</i></p> <p><i>It is widely acknowledged the impact housing has on health; having a good quality safe, secure and warm home is a human right. By providing detailed information for developers and providers of housing and housing related services in the Borough we expect to encourage the further development of new affordable social housing; improve the quality of existing housing in the public and private sector and to encourage the provision of specialised housing for those with additional support needs for example, Extra Care housing with care, accessible homes for people with mobility concerns and better safer communities to live in.</i></p>

	<p><i>Our work will support the Homelessness and Rough Sleeper Strategy by providing new homes and solutions to homelessness.</i></p>
<p>2. Data and evidence What are the key sources of data, indicators, and evidence that allow you to identify HI in your topic?</p> <ul style="list-style-type: none"> • Consider nationally available data such as health profiles and RightCare • Consider local data such as that available in JSNA, contract performance data, and qualitative data from local research 	<p><i>When developing the strategy we have examined key data from the following sources:</i></p> <ul style="list-style-type: none"> • <i>2021 Census Data</i> • <i>Warwickshire health profiles priorities</i> • <i>Warwickshire JSNA</i> • <i>Housing waiting list data including specific characteristics of those applying for housing</i> • <i>ONS Indices of multiple deprivation including LSOA level health deprivation 2019</i> • <i>Homelessness data including characteristics of households.</i> • <i>Warwickshire County Council Market Position Statement 2024</i> • <i>Director of Public Health report 2022 – Health and the high cost of living in Warwickshire.</i> • <i>HEART performance data 2022/23 & 2023/2024</i> • <i>Delivering a Better Warwickshire and Nuneaton and Bedworth Levelling Up Plan</i>
<p>B. Assess - examine the evidence and intelligence</p>	
<p>3. Distribution of health Which populations face the biggest health inequalities for your topic, according to the data and evidence above?</p>	<ul style="list-style-type: none"> • <i>Homeless households including rough sleepers.</i> • <i>Households in temporary accommodation including families with dependent children</i> • <i>Poverty and low-income households including those reliant on benefits</i> • <i>Households with physical disability and/or health conditions</i> • <i>Households suffering with mental ill health</i> • <i>Households with physical mobility difficulties</i>

	<ul style="list-style-type: none"> • <i>Households living in overcrowded conditions</i> • <i>Households experiencing or a risk of experiencing domestic violence and/or abuse</i> • <i>Households experiencing non-violent harassment</i> • <i>Persons with learning disabilities and autism</i> • <i>Drug and alcohol dependent households</i> • <i>Older persons living in unsuitable accommodation.</i> • <i>Private rented sector households living in properties in disrepair or in cold damp properties.</i> • <i>Households experiencing or at risk of racism and hate crime.</i> • <i>Households experiencing sexual abuse/exploitation</i> • <i>Former serving armed forces/veterans</i> • <i>Care Leavers</i>
	<p>Inclusion health and vulnerable groups (for example, people experiencing homelessness, prison leavers, young people leaving care):</p> <ul style="list-style-type: none"> • <i>Homeless households including rough sleepers.</i> • <i>Households in temporary accommodation including families with dependent children</i> • <i>Poverty and low-income households including those reliant on benefits</i> • <i>Households with physical disability and/or health conditions</i> • <i>Households suffering with mental ill health</i> • <i>Households with specialised supported housing needs inability to maintain homes</i> • <i>Households with physical mobility difficulties</i> • <i>Households living in overcrowded conditions</i> • <i>Households experiencing or a risk of experiencing domestic violence and/or abuse</i>

	<ul style="list-style-type: none"> • <i>Drug and alcohol dependent households</i> • <i>Older persons living in unsuitable/unsafe accommodation.</i> • <i>Private rented sector households living in properties in disrepair or in cold damp properties.</i> • <i>Households experiencing or at risk of racism and hate crime.</i> • <i>Households experiencing sexual abuse/exploitation</i> • <i>Former serving armed forces/veterans</i> • <i>Care leavers</i>
<p>4. Causes of inequalities</p> <p>What does the data and evidence tell you are the potential drivers for these inequalities?</p> <ul style="list-style-type: none"> • Which wider determinants are influential? E.g. income, education, employment, housing, community life, racism and discrimination. • What aspects of mental wellbeing are affected? Consider risk and protective factors. • Which health behaviours play a role? • Does service quality, access and take up increase the chance of health inequalities in your work area? <p>Which of these can you directly control? Which can you influence? Which are out of your control?</p>	<p>Wider determinants:</p> <ul style="list-style-type: none"> • <i>Housing is a key determinant of health and a major cause of health inequalities; the impacts on a person’s physical and mental health and wellbeing of being homeless or living in poor housing conditions is well documented and acknowledged. In 2022 the Local Government Association estimated that the cost of poor housing to the NHS was £1.4 billion per year. Since 2022 the housing crisis in the UK has worsened, including a rise in households looking for social housing who would have historically looked to buy their own home. The number of applicants on the Nuneaton and Bedworth housing register has more than tripled since 31 March 2020 when there were 1,235 households, the number of households now stands in excess of 4,100 and continues to rise daily due to the lack of affordable housing.</i> • <i>Homelessness including rough sleeping continues to increase. The level and risk of people sleeping rough is carefully monitored by a multi-agency forum, we have seen an increase in the number of people who are reporting as, or who are at risk of sleeping rough.</i> • <i>As the housing waiting list grows, the number of household reporting health and mental health as their need for housing also grows. The health and disability identified range from low level to high by both the primary applicant and members of their household. In October 2024 there were:</i> <ul style="list-style-type: none"> ○ <i>4146 applicants on the NBBC Housing List</i> ○ <i>81% of applicants or a member of their household identify as having a level of health need including mental health concerns.</i> ○ <i>16% of applicants identify as having a disability.</i> ○ <i>29% of applicants say their health condition or disability is caused or aggravated by their accommodation.</i> ○ <i>15% of applicants say their current accommodation causes stress and distress.</i> ○ <i>15% of applicants say their health or disability will significantly improve by moving home</i>

	<ul style="list-style-type: none">○ <i>6% of applicants unable to occupy current accommodation due to significantly high medical or disability needs</i> ● Length of stay in temporary accommodation being significantly longer than necessary due to the lack of affordable homes to move on to. This includes:<ul style="list-style-type: none">● <i>Families with dependent children,</i>● <i>Households/persons with mental and/or physical ill health or disability,</i>● <i>Victims of domestic abuse</i> ● Which wider determinants are influential? E.g. income, education, employment, housing, community life, racism and discrimination.<ul style="list-style-type: none">▪ <i>Housing</i>▪ <i>Low income</i>▪ <i>Employment</i>▪ <i>Education</i>▪ <i>Community life</i>▪ <i>Domestic Abuse</i>▪ <i>Leaving the criminal justice system</i> ● What aspects of mental wellbeing are affected? Consider risk and protective factors. <p><i>A person's mental wellbeing is greatly affected by their housing situation. It is widely reported by national organisations such as MIND and Shelter, how much overcrowding, poor quality housing and/or the lack of a suitable permanent home contribute to a persons' mental health issues such as stress, anxiety and depression.</i></p><p><i>Everyone deserves the right to a safe, secure and good quality permanent home. Living in properties with disrepair, damp and mould, fear of crime and anti-social behaviour and/or feeling isolated or lonely, not only impact on a person's physical health but greatly affect a persons' mental health and often their ability to engage fully with society, education and employment.</i></p>
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	<p><i>Our allocation process already identifies those whose mental wellbeing is affected by their current accommodation or housing situation. Those identifying with mental health needs are given the correct level of priority for housing appropriate to these needs, to ensure those in the highest need have the opportunity to secure an offer of accommodation. The current lack of affordable homes to rent in the Borough means the supply fails to be sufficient to meet the needs of everyone on our waiting list.</i></p> <ul style="list-style-type: none"> • Which health behaviours play a role? <p><i>The impact of lack of housing and the stressors this has on a person's mental health is acknowledged to cause individuals to undertake unhealthy behaviours such as smoking, and excessive alcohol and drug use. Whilst these are evidenced on an individual level in the support needs recorded of those who are homeless in the Borough, this data is not collected in the characteristics of those on our waiting list.</i></p> <ul style="list-style-type: none"> • Does service quality, access and take up increase the chance of health inequalities in your work area? <p><i>The need and demand for housing is exceptionally high, our service quality, access and take up is not an issue; it is the current housing crisis that impacts the most on health inequalities. Households with the highest level of health needs are prioritised for housing; however, the pure lack of affordable homes for people to live in, prevents a person from improving their health outcomes and is our biggest concern. The lack of housing is not only about the supply of social housing to rent but is also the affordability level of private rented and homeownership accommodation coupled with the low-income levels in the Borough. We have a programme of works to continue to improve the condition of the council owned housing stock, and action quickly any homes that are identified to have health hazards in both our own and privately owned housing. We will also make adaptations that are recommended by HEART to council homes to improve the health outcomes for our own tenants to enable them to remain in their own homes.</i></p> <p>Which of these can you directly control?</p> <p><i>Our allocation policy prioritises those in the highest need including those with physical and mental health need, and accommodation is offered to the household with the highest priority. The condition of our own housing stock, and actioning reported poor private sector housing and landlords.</i></p>
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	<p>Which can you influence?</p> <p><i>We can encourage the development of new affordable social housing in our Borough by working in close collaboration with developers and Register Providers of housing. We can also use innovative initiatives to maximise the best use of the council owned housing, e.g. supporting households who are under occupying large family homes to right size to a home that meets their household size and needs.</i></p> <p>Which are out of your control?</p> <ul style="list-style-type: none"> • <i>Cost of living crisis,</i> • <i>lack of affordable housing to rent ,</i> • <i>Unaffordability of the private rented sector rents.</i> • <i>Unaffordability of homeownership</i> • <i>Low paid incomes</i>
<p>C. Refine and apply – make changes to your work plans that will have the greatest impact</p>	
<p>5. Potential effects In light of the above, how is your work likely to affect health inequalities? (positively or negatively)</p> <p>Could your work widen inequalities by:</p> <ul style="list-style-type: none"> • requiring self-directed action which is more likely to be done by affluent groups? • not tackling the wider and full spectrum of causes? 	<p>In light of the above, how is our work likely to affect health inequalities? (positively or negatively)</p> <p><i>We can also use innovative initiatives to maximise the best use of the council owned housing, e.g. supporting households who are under occupying large family homes to right size to a home that meets their household size and needs, and protecting the Borough's limited supply of 4 and 5 bedroom homes and properties that have been significantly adapted from being under occupied by households that no longer requires the number of bedrooms or adaptations that have been made and restricting the tenants of those properties from exercising their right to buy their council home by using "fixed term tenancies".</i></p> <p>In light of the above, how is your work likely to affect health inequalities? (positively or negatively)</p>

<ul style="list-style-type: none"> • not being designed with communities themselves? • relying on professional-led interventions? • not tackling the root causes of health inequalities? 	<p><i>The work we do in housing does greatly affect health inequalities by providing homes for those who need them. We ensure that those who are in the highest housing need are given the greatest priority available to ensure they have maximum opportunity to bid for empty homes as they become available. We will in times of high levels of homeless households placed in temporary accommodation use the powers within our allocation policy to direct match those in the greatest need. This in turn will reduce the health inequalities by providing a permanent home and alleviating the mental health impacts experienced by those spending excessive lengths of time living in temporary accommodation.</i></p> <p><i>We will encourage and work with developers to maximise the number of affordable homes built and try wherever possible to promote the delivery of homes to rent. We work closely with the private sector landlords to encourage the delivery of affordable housing and will support them and their tenants to prevent eviction.</i></p> <p><i>Negatively, it is purely demand far out reaching supply - whilst the Council does build their own accommodation it is small in number; we cannot deliver new homes alone, we are reliant on affordable housing delivered through our section 106 agreements and land-led registered provider development.</i></p> <p>Could our work widen inequalities by:</p> <ul style="list-style-type: none"> • requiring self-directed action which is more likely to be done by affluent groups? <i>No</i> • not tackling the wider and full spectrum of causes? <i>No</i> • not being designed with communities themselves? <i>No</i> • relying on professional-led interventions? <i>No</i> • not tackling the root causes of health inequalities? <i>No</i>
<p>6. Action plan What specific actions can your work programme or project take to maximise the potential for positive impacts and/or to mitigate the negative impacts on health inequalities?</p> <ul style="list-style-type: none"> • How can you act on the specific causes of inequalities identified above? 	<ul style="list-style-type: none"> • How can you act on the specific causes of inequalities identified above? <p><i>No more than we already do in encouraging further building of affordable homes, ensuring those in the greatest priority need are housed; making sure the homes in the Borough are in good condition including continuing to improve our own council housing and working with the private housing sector to meet regulatory standards.</i></p> <p>Could you consider targeting action on populations who face the biggest inequalities?</p>

<ul style="list-style-type: none"> • Could you consider targeting action on populations who face the biggest inequalities? • Could you design the work with communities who face the biggest health inequalities to maximise the chance of it working for them? • Could you seek to increase people’s control over their health and lives (if appropriate)? • Could you use civic, service and community-centred interventions to tackle the problem – to maximise the chance of reaching large populations at scale? • Who else can help? 	<p><i>We will continue review our allocation policy and the needs of those on our housing register periodically to ensure we meet our statutory duties for housing need and that our housing need assessments captures those facing the biggest inequalities correctly and that they receive the level of priority need appropriate to the inequalities they have.</i></p> <ul style="list-style-type: none"> • Could you design the work with communities who face the biggest health inequalities to maximise the chance of it working for them? <i>We will continue to work closely with our partners in health, care and housing to better understand the impacts of housing and the additional needs of those facing health inequalities; this will enable us in turn to work with our planning colleagues, developers and registered housing providers to maximise the delivery of homes to meet the needs of the borough. The level of demand for aids and adaptations in council homes strongly shows that due to the lack of suitable homes many people especially older households are choosing to remain in the home they have lived in for many years rather than move away from the neighbourhood that they are familiar with and who have supported them.</i> • Could you seek to increase people’s control over their health and lives (if appropriate)? <i>N/A other than supporting our health partners in promoting healthy life style initiatives and campaigns in our communities</i> • Could you use civic, service and community-centred interventions to tackle the problem – to maximise the chance of reaching large populations at scale? <i>N/A</i> • Who else can help? <i>Developers of social housing and Registered Providers.</i>
<p>7. Evaluation and monitoring How will you quantitatively or qualitatively monitor and evaluate the effect of your work on different population groups at risk of health inequalities? What output or</p>	<p><i>We will continue to monitor our demand for housing, the supply of affordable housing and levels of homelessness and rough sleeping. We will review our Allocation Policy and amend as required with Housing legislation and regulatory guidance to ensure we continue to house those in the highest priority need.</i></p>

process measures could you consider?	<i>Work with developers, registered providers and our planning colleagues to ensure that new homes being built are the right size and type to meet the housing needs of the Borough.</i>
Set a health equity assessment review date, recommended for between 6 and 12 months from initial completion. Review date:	

D. Review – identify lessons learned and drive continuous improvement	
Date completed <small>(should be 6-12 months after initial completion):</small>	
Contact person (name, directorate, email, phone)	
1. Lessons learned Have you achieved the actions you set? How has your work: a) supported reductions in health inequalities associated with physical and mental health? b) promoted equality, diversity and inclusion across communities and groups that share protected characteristics? What will you do differently to drive improvements in your programme? What actions and changes can you identify?	

Report Summary Sheet

Date: 6th November 2024

Subject: Creative Explorers Update

Portfolios: Leisure, Communities and Health (Councillor T. Jenkins)

From: Assistant Director – Recreation and Culture

Summary:

To provide Cabinet with an update on the delivery of the Creative Explorers programme, supported by Arts Council England, NBBC and Warwickshire County Council.

Recommendation:

1. The Creative Explorers update be noted.

Options:

1. Note the recommendation.

Reasons:

This report provides an update on the delivery of programme - Creative Explorers is a 21-month journey with the Council, arts organisations, artists, and residents working together to create a unique cultural identity for Nuneaton & Bedworth which builds skills, generates civic pride and confidence, develops the visitor economy, and leads to a creative borough.

Consultation undertaken with Members/Officers/Stakeholders

Portfolio Holder – Leisure, Communities and Health

Subject to call-in: Yes

Ward relevance: All Wards

Forward plan: Yes

Building A Better Borough

Aim 3: Visit

Priority 3: Celebrate and promote our heritage

Relevant statutes or policy:

Building a Better Borough
Nuneaton and Bedworth Cultural Strategy 2023 - 2028

Equalities Implications:

The programme is helping to deliver access, and opportunities within Culture for all members of the Borough including for protected groups.

Human resources implications:

Recruitment for a Creative Explorers Project Officer was unsuccessful, therefore a Freelance Officer was sourced via the procurement channels.

Financial implications:

The Council were successful in obtaining funding from Arts Council England (ACE) of £750K, with financial input from NBBC and WCC to deliver the programme. Further sponsorship funds were secured through the key external partners towards a festival of events that will help deliver culture in its widest sense within the Borough.

Health Inequalities Implications:

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

Section 17 Crime & Disorder Implications:

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

Risk management implications:

The additional sponsorship funds required form external partners and detailed as part of the overall project funding.

Environmental implications:

A number of the events have been delivered with a sustainable focus, such as the Bamboo events where all-natural material from bamboo will be used to deliver a bamboo circus style event and the use of bamboo for other activities.

Legal implications:

None identified

Contact details:

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AGENDA ITEM NO:9

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: 6th November 2024

From: Assistant Director – Recreation and Culture

Subject: Creative Explorers Update

Portfolios: Leisure, Communities and Health (Councillor T. Jenkins)

Building A Better Borough

Aim 3 – Visit

Priority 3: Celebrate and promote our heritage

1. Purpose of Report

To provide Cabinet with an update on the delivery of the Creative Explorers programme supported by Arts Council England (ACE), following a successful grant application by NBBC in partnership with arts organisations and Warwickshire County Council.

2. Recommendation

2.1 The Creative Explorers update be noted.

3. Background

3.1 Creative Explorers is a 21-month journey with the Council, arts organisations, artists, and residents working together to create a unique cultural identity for Nuneaton & Bedworth which builds skills, generates civic pride and confidence, develops the visitor economy, and leads to a creative borough.

3.2 The project outcomes from the successful application were to deliver a range of arts / cultural activities, linking with the heritage of the Borough, culminating in festivals and activities in the town centres with a final event similar to the previous combustion Sanctuary Event for regional, national, and international exposure based on an industrial culture and arts theme. This application also detailed how delivery of arts and culture can support the local economy and regeneration.

3.3 The programme commenced in March 2023 and will run until early 2025.

4.0 Programme Update

4.1 Creative Explorers is a cultural programme led by Nuneaton and Bedworth Borough Council in partnership with Imagineer, Warwickshire County Council and Artichoke. Key funders include:

- Arts Council England
- Big Local
- National Lottery Community Fund
- Philip Bates Trust
- The Alan Edward Higgs Charity
- The Paul Hamlyn Foundation
- 29th May 1961 Charitable Trust
- Social Fabric Fund
- Generous support from local businesses/individuals, including: Shaw Sheet Metal, Zone Developments, King Edward VI College, Roger Medwell, Ian White, Nuneaton Signs

4.2 Public-facing programmes, produced with the community include:

4.2.1 Milesians outdoor performance by Circolombia, in conjunction with Imagineer Productions at All Saints Park, Bedworth late June.

More than 1500 audience members attended over the three performances.

4.2.2 Art on the Streets' [11 August] at Nuneaton Town Centre.

Transformed the town into a site of artworks and creative engagements created by the community and its artists, including 'Convoy' a major artwork created by GRIT Artist Alisha Miller in collaboration with local businesses, X5 40' container lorries wrapped with graphic art celebrating the new technology and innovations happening in industry across the borough and the beauty of the industrial landscape; a 'Debenhams Take Over' in partnership with Zone Developments completing, created a series of stunning murals created by local artist, whilst a new Nuneaton Library Mural with young people aged 16-25 training and working with local artist Nathan Parker in collaboration with The Shout Out for the Arts Creative Explorer Programme. There were New Creative Commissions to local artists and voluntary groups to repurpose old metal street signs and street benches and GRIT red telephone box, including Art Alert & Escape Arts.

At least 3,000 members of the public enjoyed GRIT Art on the Streets, whilst local businesses reported significant increase in business, approximately 50 %.



4.2.3 Support was provided to a new Nuneaton based company Dauntless Evolution to create their first outdoor performance. They are recent graduates of East 15 and wanting to develop the company in the borough. In the process of developing this piece, they worked with local secondary schools' community groups and organisations. The company have recently been accepted by The Belgrade Springboard Programme over the next three years and will remain working in Nuneaton and Bedworth.

- 4.2.4 Imagine Bamboo Nuneaton and Bedworth [14 September] an ambitious public art project at Riversley Park, working with artistic director Orit Azaz, and supported by a new show by leading circus artists NoFit State.

The Harmony Project, devised by artists Cave Urban with local communities, a further 4,000 were involved.

- 4.2.5 Babylon Gamelan between 26-28 September, an interactive mechanical sculpture and sound installation created by artist Dave Young and Rag & Bone, stood at Miners' Welfare Park, as part of the programme's broader exploration into the future opportunity of a regular biennial in the area.

4.3 Sector development and capacity building:

- 4.3.1 Shout Out for the Arts has been delivering a very successful programme of ambassador training workshops, creative activities and working with youth groups and communities from across the borough, Producer Kim Hackleman has brought together an ambitious group of young people aged 18 – 25 to form the Nuneaton and Bedworth Youth Arts Board.

- 4.3.2 Planning has begun for a Creative Careers Week in November at The Abbey Theatre Nuneaton. The idea has come from young people who want to know more about the range of creative career opportunities and training which is open to them and will link together a range of organisations from across the Creative Industries in the region and beyond.

- 4.3.3 A 'fit to bid' capacity training programme is now being built to ensure that grass roots organisations, individual practitioners and communities across Nuneaton and Bedworth (who may not have been engaged in the core programme) are provided support with needs identified: including fundraising, Health and Safety/events management and

- 4.3.4 Throughout programme development, Artichoke and Imagineer have been supporting and training creative practitioners, organisations and communities to: Professional development and training in delivering events/projects in a more sustainable way, Creative labs for practising artists, support in writing ACE bids.

4.4 Marketing/Communications

- 4.4.1 A landing page has been created for creative programmes across Nuneaton and Bedworth, which can be used going forward to consolidate and elevate the ambitions of NBBC's Cultural Strategy.

- 4.4.2 Filming continues throughout programme, with a view to creating an asset to support evaluation and ongoing legacy from the work. In response to the restructure in the communications team, the project team now have a weekly meeting on social media content and press releases, to ensure available resource is maximized and supported.

4.4.3 Coverage has included:

<https://hinckleyfreepress.co.uk/2024/06/02/australian-artist-lands-in-nuneaton-and-will-help-town-creatives-build-giant-instrument/>

<https://coventryobserver.co.uk/news/coventry-news-australian-artist-visits-nuneaton-and-bedworth/>

<https://www.coventrytelegraph.net/in-your-area/outdoor-circus-spectacular-hit-bedworth-29433303>

<https://www.coventrytelegraph.net/news/local-news/map-reveals-every-location-nuneatons-29678980>

<https://www.coventrytelegraph.net/news/local-news/map-reveals-every-location-nuneatons-29678980>

<https://hinckleyfreepress.co.uk/2024/08/04/nuneatons-grit-arts-will-shine-light-on-creativity-in-borough-next-sunday/>

<https://www.coventrytelegraph.net/news/local-news/just-beginning-say-organisers-nuneatons-29728665>

4.5 Evaluation

4.5.1 A full evaluation is due in January 2025. Comments have included to date:

“My wife and two younger grandchildren spent a lovely few hours in Nuneaton town centre this (past) Sunday. Both (at 9 and 14) are really interested, enthused and animated by outdoor public art ... and their reaction to what they saw on Sunday helped “connect” (old) grandparents with (young) grandchildren.”

“I’ve seen the (unusually) positive reaction from the media to what happened on Sunday. This is an early but important manifestation that people “now expect ... and aspire... to more”. Hopefully we are beginning to demonstrate that “what south Warwickshire expects of right” is now equally demanded ... and valued... by the people and communities of the more “deprived” north of the sub-region.”

“I’m so incredibly proud of all the Nuneaton artists that made this happen. We have worked nationally and internationally but to make our home town genuinely smile, really did bring a tear to my eye.”

4.5.2 Milesians/three-word evaluation cloud:



Cabinet

Report Summary Sheet

Date: 6th November 2024

Subject: General Fund Budget Monitoring Q2

Portfolio: Resources & Customer Services (Councillor S Hey)

From: Assistant Director - Finance

Summary:

To present the forecast revenue outturn position for the General Fund as at 30th September 2024.

Recommendations:

That the forecast outturn position for the General Fund for 2024/25 be noted, with consideration given to key variances.

Options:

To accept the report or request further information on the forecasted position.

Reasons:

The Council is required to achieve a balanced budget each year.

Consultation undertaken with Members/Officers/Stakeholders

Councillor Hey, Management Team and relevant officers

Subject to call-in:

Yes

Ward relevance:

None directly.

Forward plan:

Yes

Building a Better Borough Aim:

Work

Building a Better Borough Priority:

Grow a strong and inclusive economy.

Relevant statutes or policy:

Local Government Finance Act 1992

Equalities Implications:

None

Human resources implications:

None

Financial implications:

Detailed in the report.

Health Inequalities Implications:

None

Section 17 Crime & Disorder Implications:

None

Risk management implications:

The Council analyses risks as part of the budget setting process and ensures an appropriate level of reserves are in place.

Environmental implications:

None

Legal implications:

To achieve a balanced budget each year.

Contact details:

Liam Brown, Assistant Director - Finance

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AGENDA ITEM NO. 10

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Cabinet - 6th November 2024

From: Assistant Director - Finance

Subject: General Fund Budget Monitoring Q2

Portfolio: Resources & Customer Services (Councillor S Hey)

Building a Better Borough Aim: Work

Building a Better Borough Priority: Grow a strong and inclusive economy

1. Purpose of Report

1.1 To present the forecast revenue outturn position for the General Fund as at 30th September 2024 unless otherwise stated in the report.

2. Recommendations

2.1 That the forecast outturn position for the General Fund for 2024/25 be noted, with consideration given to key variances.

3. Background

3.1 The General Fund and Housing Revenue Account (HRA) revenue and capital budgets for 2024/25 were approved by Cabinet and Council in February 2024. This report is a detailed update of performance against the General Fund revenue budget as at September 2024.

3.2 This report considers the spend pressures that may be coming to the forefront, whether income projections are on target and whether savings that were built into the budget are on track.

4. Body of Report

4.1 Apart from Council housing, day-to-day revenue income and expenditure for Council services is accounted for through the General Fund. The net expenditure is financed through the Council's Core Spending Power which includes Council Tax, Retained Business Rates and other general Government Grants.

4.2 The revenue budget for 2024/25 was set as a net expenditure of £19,131,423 with core income and reserve contributions expected of £19,133,536 resulting in a surplus of £2,113. Currently there are

forecasted pressures and savings which are resulting in a £10k underspend variance to the approved surplus.

- 4.3 A summary of the Council's budget and forecasted expenditure is contained in the following table with more detail included in Appendix 1.

	Forecast £	Approved Budget £	Variance £
Business & Regeneration	(410,860)	(345,337)	(65,523)
Resources and Customer Services	11,825,178	12,053,041	(227,863)
Leisure, Communities and Health	4,285,650	4,153,055	132,595
Environment and Public Services	5,784,219	5,281,730	502,489
Housing	(578,645)	(538,138)	(40,507)
Planning and Enforcement	438,967	221,951	217,016
Portfolio Total	21,344,509	20,826,304	518,205
Other Operating Costs/Income	(2,223,271)	(1,694,881)	(528,390)
Core Funding	(19,133,536)	(19,133,536)	0
Total (Surplus) / Deficit	(12,298)	(2,113)	(10,185)

- 4.4 The key variances are included below with commentary:

	£'000
Reduced Sherbourne MRF Income	350
Savings provision from vacancies (net of agency costs)	315
Reduced contribution from reserves	100
Increased Subsidy loss	64
Additional Court costs for Planning Appeals	54
Additional Recycling costs	50
Costs due to Civic Hall lease delay	50
Additional Borough plan costs	40
Additional Legal Costs	30
Increase Investment Income	(568)
Reduced External Borrowing Costs	(470)
Reduced NNDR costs	(25)
	(10)

Spend Pressures

- 4.5 The new Sherbourne facility is facing additional costs since fully operating which is seeing lower than budgeted recycling rebate per

tonne causing a pressure (£350k). The partners of the facility are working closely with the staff at Sherbourne to better understand the impact and mitigate future pressures. The recycling service is also seeing increased costs for collections as per the current contract arrangements with Coventry City Council (£50k).

- 4.6 Small changes to Benefit subsidy can have a significant impact on the Council due to the size of the budget. Losses are mainly due to the cost of housing homeless individuals that cannot be recovered and has been an ongoing problem for the Council for a number of years. There is an expectation to increase the need for temporary accommodation from September due to the government changes in early release for previous offenders from prisons which could have an impact on the subsidy losses (£64k).
- 4.7 Requirements on completing repair works to the Civic Hall accompanied with the delays to signing the lease have resulted in additional costs than were budgeted for the property in 2024/25 (£50k).
- 4.8 Additional external legal support was required for environmental protection causing a pressure on the General Fund position (£30k).
- 4.9 The Borough plan review has seen higher than anticipated fees for inspectors and programme officers causing an in-year pressure (£40k).
- 4.10 The savings from vacancies are currently not achieving the budgeted provision which is causing an additional pressure on the General Fund (£315k). Work is being undertaken to investigate the vacancy savings being forecasted with controls still in place for recruitment.
- 4.11 With a numerous amount of planning appeals on-going during 2024/25 there has been additional court costs (£54k).
- 4.12 Less appropriations from reserve to fund specific expenditure has resulted from in-year discrepancies showing a variance in the net expenditure (£100k).

Savings

- 4.13 The market conditions and improved treasury management practices has seen increased investment income within the first half of the financial year in comparison to prudential budgetary assumptions (£568k).
- 4.14 Budgets for borrowing money early in the financial year for capital projects has been proactively managed and allowed a delay in external borrowing. This has resulted in reduced external interest charges in comparison to expectations (£470k).

4.15 After a review of NNDR costs within car parks, markets and street trading and temporary accommodation, these costs are anticipated to be less than budgeted resulting in an underspend (£25k).

5. Conclusion

5.1 Through improved treasury management early sighted pressures have been able to be offset through managing cash levels and experiencing higher returns on investments. The Council needs to identify long-term savings in order to be less reliant on these activities to find a balanced position in-year.

5.2 Recruitment is still being closely monitored and kept under review with a £500k savings provision being in the 2024/25 budget. Currently this is under close scrutiny and will continue to be monitored across the financial year.

5.3 The transformation programme is starting to gather pace and will be key to increasing efficiency and effectiveness across the Council which will in turn generate savings and income and is essential to ensure the Council remains financially viable.

6. Appendices

6.1 Appendix 1 General Fund Forecast 2024/25

7. Background Papers

7.1 General Fund Budget Setting Report – Cabinet and Council February 2024

SUMMARY GENERAL FUND FORECAST OUTTURN

as at end of September 2024

	2024/25 Current Budget £	2024/25 Current Forecast £	2024/25 Forecast Variance £	Key Reason for Forecast Variance to Budget
Business & Regeneration	(345,337)	(410,860)	(65,523)	Underspend due to vacancy savings on Economic Development.
Resources and Customer Services	12,053,041	11,825,178	(227,863)	Increased losses on subsidy from temporary accommodation are offset by vacancies with central services.
Leisure, Communities and Health	4,153,055	4,285,650	132,595	Overspend forecast due to grounds maintenance provision now being forecast within the service area alongside spend pressure from additional repair works and delay in signing the lease for the Civic Hall.
Environment and Public Services	5,281,730	5,784,219	502,489	Overspend as a result of reduced income from Sherbourne Recycling facility and additional contractor payments for recycling arrangements alongside increased net agency costs.
Housing	(538,138)	(578,645)	(40,507)	Underspends on Business Rates budget for Eaton House due to a change in valuation and additional income from greater uptake of House in Multiple Occupation licenses, slightly offset by the use of agency staff.
Planning and Enforcement	221,951	438,967	217,016	Overspend as a result of legal fees for Environmental Protection causing an additional pressure, additional Borough Plan costs due to higher-than-expected fees for inspectors and programme officers, lower uptake of street naming application and additional court costs from planning appeals.
Portfolio Total	20,826,304	21,344,509	518,206	
Central Provisions	641,755	1,051,755	410,000	The saving in relation to controlled recruitment is taken out centrally as well as the provision for increased grounds maintenance costs as both are forecasted within the portfolio.
Depreciation & Impairment	(3,096,530)	(3,096,530)	0	
Contributions To/From Reserves	(1,435,806)	(1,335,806)	100,000	Reduced appropriations from reserves.

Financing of Capital Expenditure	1,200,000	1,200,000	0	
PWLB Premiums	21,120	21,120	0	
Investment Income	(582,508)	(1,151,340)	(568,832)	Additional investment income as a result of treasury management and interest rates continuing to stay higher than anticipated.
Minimum Revenue Provision	580,290	580,290	0	
External Interest	976,798	507,240	(469,558)	Reduced external interest costs due to treasury management delaying the need of borrowing.
Total Council Net Expenditure	19,131,423	19,121,238	(10,184)	
Council Tax	(10,566,339)	(10,566,339)	0	
New Homes Bonus	(1,180,874)	(1,180,874)	0	
General Government Grants	(552,494)	(552,494)	0	
Business Rates Retention	(5,529,042)	(5,529,042)	0	
NDR Collection Fund (Surplus)/ Deficit	(1,351,683)	(1,351,683)	0	
Council Tax Collection Fund (Surplus)/ Deficit	46,896	46,896	0	
Total Funding	(19,133,536)	(19,133,536)	0	
(Surplus) / Deficit	(2,113)	(12,298)	(10,184)	



Cabinet

Report Summary Sheet

Date: 6th November 2024

Subject: Housing Revenue Account Budget Monitoring Q2

**Portfolio: Resources & Customer Services (Councillor S Hey)
Housing (Councillor C Watkins)**

From: Assistant Director - Finance

Summary:

To present the forecast revenue outturn position for the Housing Revenue Account (HRA) as at 30th September 2024.

Recommendations:

That the forecast outturn position for the HRA for 2024/25 be noted, with consideration given to key variances.

Options:

To accept the report or request further information on the forecasted position.

Reasons:

The Council is required to achieve a balanced budget each year.

Consultation undertaken with Members/Officers/Stakeholders

Councillor Hey and Cllr Watkins, Management Team and relevant officers

Subject to call-in: Yes
Ward relevance: None directly.
Forward plan: Yes

Building a Better Borough Aim: Work
Building a Better Borough Priority: Grow a strong and inclusive economy.
Relevant statutes or policy: Local Government Finance Act 1992

Equalities Implications: None
Human resources implications: None
Financial implications: Detailed in the report.
Health Inequalities Implications:

None

Section 17 Crime & Disorder Implications:

None

Risk management implications:

The Council analyses risks as part of the budget setting process and ensures an appropriate level of reserves are in place.

Environmental implications:

None

Legal implications:

To achieve a balanced budget each year.

Contact details:

Liam Brown, Assistant Director - Finance

Liam.Brown@nuneatonandbedworth.gov.uk

AGENDA ITEM NO. 11

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Cabinet - 6th November 2024

From: Assistant Director - Finance

Subject: Housing Revenue Account Budget Monitoring Q2

Portfolio: Resources & Customer Services (Councillor S Hey)
Housing (Councillor C Watkins)

Building a Better Borough Aim: Work

Building a Better Borough Priority: Grow a strong and inclusive economy

1. Purpose of Report

1.1 To present the forecast revenue outturn position for the Housing Revenue Account (HRA) as at 30th September 2024 unless otherwise stated in the report.

2. Recommendations

2.1 That the forecast outturn position for the HRA for 2024/25 be noted, with consideration given to key variances.

3. Background

3.1 The General Fund and HRA revenue and capital budgets for 2024/25 were approved by Cabinet and Council in February 2024. This report is a detailed update of performance against the HRA revenue budget as at September 2024.

3.2 This report considers any spend pressures and any potential risks to rental income levels.

4. Body of Report

4.1 The Council is required to account separately for income and expenditure in providing council housing.

4.2 The revenue budget for 2024/25 was set as a net expenditure of £0. The Council is currently predicting net underspend of £188,395.

- 4.3 A summary of the HRA's budget and forecasted expenditure is contained in the following table with more detail included in Appendix 1.

	Forecast £	Approved Budget £	Variance £
Income	(31,486,128)	(31,371,835)	(114,293)
Supervision & Management	11,260,923	11,249,010	11,913
Repairs & Maintenance	6,392,241	6,118,725	273,516
Capital Financing Costs	10,765,472	10,728,395	37,077
Appropriations	2,879,097	3,275,705	(396,608)
Other Operating Costs/Income	0	0	0
Total	(188,395)	0	(188,395)

- 4.4 The key variances are included below with commentary:

	£'000
Additional Costs for Repairs and Maintenance	412
Increased Utility Bills	206
Additional Costs for Subscriptions	62
Increased Interest Payments	37
Reduced Rental Income	34
Additional Appropriations from Reserves	(397)
Vacancy Savings	(327)
Increase Investment Income	(148)
Grounds Maintenance underspend	(47)
Reduced feasibility studies	(20)
	<u>(188)</u>

Spend Pressures

- 4.5 Utility bills are forecasted to be higher than expected on the warden assisted schemes (£206k). This pressure is being reviewed closely to ensure all bills are received based on actual usage rather than estimates.
- 4.6 Currently there is a backlog of repairs and maintenance outstanding on the HRA and dealing with this issue is causing more work to be conducted. This is causing additional costs (£412k) but there has been

a review on earmarked reserves to help fund this balance whilst mechanisms are put in place to improve this in future financial years.

- 4.7 Whilst the HRA Business Plan is being worked on for 2025/26 Budget Setting, the treasury team have had to re-finance existing debt which is causing additional interest costs for the HRA (£37k).
- 4.8 Subscription fees for the Housing Ombudsman and other relevant bodies are considerably higher than previous years which has caused an in-year overspend (£62k).
- 4.9 There is a small reduction (£34k) on rental income due to the Gables refurbishment requiring an additional 2 months to complete all works.

Savings

- 4.10 A review on earmarked reserves has resulted in increased appropriations from reserves to offset overspends across the HRA (£397k). This will be monitored throughout the financial year to see if the expected spend against these reserves are lower than expected as the reliance on drawdowns cannot continue for future financial years.
- 4.11 As reported in the Q2 forecast for the General Fund, through improved cash management and treasury practices investment income is higher than anticipated (£148k).
- 4.12 The HRA is currently operating with various vacancies within repairs and therefore is seeing a vacancy saving (£327k).
- 4.13 Expected savings on grounds maintenance works across the HRA (£47k)
- 4.14 It is expected no feasibility studies are going to be completed in 2024/25 whilst the HRA business plan is being developed resulting in an in-year saving (£20k).

5. Conclusion

- 5.1 Spend pressures as a result of the cost of inflation and dealing with repairs issues are affecting the day-to-day operation of the HRA.
- 5.2 A review of the HRA Business Plan is underway and will lay out the future plan for income generation and cost mitigation. With the changes to housing legislation and expectations on housing providers, the profile of expenditure is likely to alter. When finalised, the Business Plan will be presented to Cabinet.

6. Appendices

- 6.1 Appendix 1 - HRA Forecast 2024/25
- 7. Background Papers (if none, state none)
- 7.1 Housing Revenue Account Budget 2024/25 – Cabinet February 2024.

HRA FORECAST OUTTURN

as at end of September 2024

Service	2024/25 Current Budget £	2024/25 Current Forecast £	2024/25 Forecast Variance £	Comments
HRA General Expenses	4,976,325	4,871,497	(104,828)	Increase in subscriptions and audit costs offset by vacancy underspends.
HRA Repairs Management	1,224,980	1,239,338	14,358	Increase in subscriptions and audit costs slightly offset by vacancy underspends.
Resident Involvement	44,790	39,700	(5,090)	Minor budgets are forecasted to be unused
Debt Management Costs	135,940	135,940	0	
Increase in bad debt provision	485,360	485,360	0	
HRA share of Corporate and Democratic Core	0	0	0	
HRA share of non-distributed costs	0	0	0	
Housing System	242,000	242,000	0	
Development Strategy	240,290	188,821	(51,469)	Vacancy savings and unused feasibility studies budget.
SUPERVISION & MANAGEMENT - GENERAL	7,349,685	7,202,656	(147,029)	
HRA Special Expenses	86,625	76,175	(10,450)	Small utility bills savings in relation to council tax.
Warden Assisted Schemes	2,517,500	2,751,583	234,083	Pressures from increased utility bills based on rate increase in 2024/25.
Homeless Hostels	65,415	66,955	1,540	Higher utility costs for BT phone lines.
Spitalfields House - Bedworth	104,630	96,635	(7,995)	Underspend in relation to electricity budgets.
ST Benedicts House	54,280	57,490	3,210	
Other Housing Schemes	694,390	679,640	(14,750)	Minor vacancy savings and small utility savings
Grounds Maintenance	376,485	329,789	(46,696)	Underspend on Grounds Maintenance and repairs
SUPERVISION & MANAGEMENT - SPECIAL	3,899,325	4,058,267	158,942	

Reactive Repairs	2,472,615	2,354,138	(118,477)	Vacancy savings are slightly offset by increased costs for training and tools.
Call Out	85,950	97,889	11,939	Increased call out due to essential work at off-peak times.
R.+ M. - Dwellings	272,000	443,000	171,000	Increase costs for scaffolding and damp proofing works.
R. + M. - Estate Management	24,000	24,000	0	
Asbestos	145,000	145,000	0	
R. + M. - Homeless Hostels	7,460	7,460	0	
R. + M. - Shops & Other Co.	5,000	5,000	0	
Planned Works - Outside Contractors	2,059,940	2,200,140	140,200	Increased contract fees for external contractors on gas servicing / maintenance and electrical works.
Water & Energy Service Outside Contracts	308,710	409,500	100,790	Additional costs for legionella control works and fire systems services / maintenance..
R + M - Voids	738,050	706,114	(31,936)	Vacancy savings.
REPAIRS & MAINTENANCE	6,118,725	6,392,241	273,516	
Depreciation	8,724,000	8,724,000	0	
Interest Payable	2,004,395	2,041,472	37,077	Additional interest costs
CAPITAL FINANCING COSTS	10,728,395	10,765,472	37,077	
Dwelling Rents H.R.A	(28,531,771)	(28,500,106)	31,665	Due to a delay in the refurbishment of the Gable this has resulted in a loss of income.
Interest Receivable	(36,800)	(184,321)	(147,521)	Additional interest from improved treasury management practices,
Non-Dwelling Rents	(590,038)	(590,038)	0	
Other Income - Independent Living Schemes	(1,502,973)	(1,502,973)	0	
Other Income - General Purpose Schemes	(688,253)	(686,690)	1,563	Due to a delay in the refurbishment of the Gable this has resulted in a loss of income.
Other Income - Rechargeable Repairs	(22,000)	(22,000)	0	
INCOME	(31,371,835)	(31,486,128)	(114,293)	
Appropriations to / (from) MRR	368,870	368,870	0	
Employee Benefits	419,665	419,665	0	
Capital Expenditure funded by HRA (CERA)	2,492,620	2,492,620	0	

Appropriations to/ (from) Revenue Reserves	(5,450)	(402,058)	(396,608)	Additional earmark reserves planning to be utilised to fund the repairs backlog on the HRA and will be closely monitored throughout the financial year.
APPROPRIATIONS	3,275,705	2,879,097	(396,608)	
Total HRA	0	(188,395)	(188,395)	



Cabinet

Report Summary Sheet

Date: 6th November 2024

Subject: Capital Forecast Q2 2024/25

Portfolio: Resources & Customer Services (Councillor S Hey)

From: Assistant Director – Finance

Summary:

To update on the Council's Q2 forecasted outturn position on capital expenditure for both the General Fund and Housing Revenue Account (HRA)..

Recommendations:

To consider the Q2 forecasted capital outturn position for 2024/25 for the General Fund and HRA.

To recommend to Council that an update to the 2025/26 forecasted Budget for Capital be included for S106 funded projects detailed in 4.18 in the report.

To recommend to Council for approval of a change to the Capital and Revenue Budget on Cemeteries for 2024/25 detailed at 4.21 in the report.

Options:

To accept the report or request further information on the outturn position.

Reasons:

To ensure the Council has an accurate capital budget.

Consultation undertaken with Members/Officers/Stakeholders

Councillor Hey, Management Team and relevant officers

Subject to call-in:

Yes

Ward relevance:

None directly.

Forward plan:

Yes

Building a Better Borough Aim:

Work

Building a Better Borough Priority:

Grow a strong and inclusive economy.

Relevant statutes or policy:

Local Government Finance Act

Equalities Implications:

None

Human resources implications:

None

Financial implications:

Detailed in the report.

Health Inequalities Implications:

None

Section 17 Crime & Disorder Implications:

None

Risk management implications:

None.

Environmental implications:

None

Legal implications:

None

Contact details:

Liam Brown, Assistant Director - Finance

Liam.Brown@nuneatonandbedworth.gov.uk

AGENDA ITEM NO. 12

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Cabinet – 6th November 2024

From: Assistant Director - Finance

Subject: Capital Monitoring Q2

Portfolio: Resources & Customer Services (Councillor S Hey)

Building a Better Borough Aim: Work

Building a Better Borough Priority: Grow a Strong & Inclusive Economy

1. Purpose of Report

1.1 To update on the Council's Q2 forecasted outturn position on capital expenditure for both the General Fund and Housing Revenue Account (HRA).

2. Recommendations

2.1 To consider the Q2 forecasted capital outturn position for 2024/25 for the General Fund and HRA.

2.2 To recommend to Council that an update to the 2025/26 forecasted Budget for Capital be included for S106 funded projects detailed in 4.18.

2.3 To recommend to Council for approval of a change to the Capital and Revenue Budget on Cemeteries for 2024/25 detailed at 4.21.

3. Background

3.1 Nuneaton and Bedworth Borough Council has a large capital programme to provide community value and improve facilities. The Q2 outturn position for 2024/25 updates on how the programme is progressing.

4. Body of Report

4.1 The Council's capital programme covers many projects for both the General Fund and Housing Revenue Account.

4.2 General Fund projects are developed in line with strategies reported to Cabinet/Council and are funded through Section 106 developer

contributions, grant funding (from the Government and other external providers), internal and external borrowing plus capital receipts generated through asset sales.

- 4.3 HRA projects are mainly for refurbishment of council houses, disabled adaptations to council housing plus new build. They are funded from HRA reserves, capital receipts from Right to Buy plus grant income.
- 4.4 The capital budget for 2024/25 of £76,092,727 was approved in February 2024. With amendments taking to cabinet in July 2024 for projects not completed in 2023/24.
- 4.5 A summary of the General Fund and HRA forecasted expenditure versus budget is below alongside financing of the programme with further detail included in Appendix 1.

	Approved Budget £	Forecast Actual £	Variance £
Business & Regeneration	20,974,046	20,974,046	0
Resources and Customer Services	125,000	125,000	0
Leisure, Communities and Health	25,480,338	25,480,338	0
Environment and Public Services	0	0	0
Housing	8,453,258	8,453,258	0
Planning and Enforcement	0	0	0
Capital General	100,000	100,000	0
General Fund	55,132,642	54,012,739	0
HRA	22,347,119	19,347,119	(3,000,000)
Total	77,479,761	73,359,858	(3,000,000)

General Fund

- 4.6 Projects are projected to be on target for the General Fund in 2024/25.

HRA

- 4.7 The capital budget for the HRA was approved as £22,079,988 in February 2024 and was subsequently changed to £22,347,119 as a result of the 2023/24 outturn reported to cabinet in July 2024.
- 4.8 Management of the HRA capital programme is based on scheduled works and progression of new build and acquisition targets. The budget as a whole is utilised by need of the customer and the most efficient use of resources to ensure value for money and will therefore fluctuate against the initial forecasted expenditure by line in any one year.

- 4.9 There is a review of the HRA Business Plan currently underway, and this will determine the spend pattern and expected profile of works in line with the changes and updates to legislative requirements.
- 4.10 The HRA is showing an underspend of £3m in 2024/25 which is as a result of the New Build Programme being delayed with works to be completed in future years. Alongside the underspend there has been some risks identified which has caused additional costs requiring a review to cut back on some programmes, these issues and mitigating actions are listed below:
- Structural repairs for properties are causing a pressure and need actioning to prevent further damage and increased costs of repair in the future
 - Additional fire safety works were required after fire risk assessments identified issues and electrical installation condition reports have identified more hazards than anticipated resulting in more costs to carry out works
 - The costs to convert the Gables have increased after the initial investigation from stripping out identified more works needed.
 - The use of consultants required for managing contracts at a higher rate has exceeded expectations due to the turnover of internal staff.
 - Due to the above additional costs, programme reviews have been undertaken and a reduction in delivery for programmes such as windows and door replacements, electric storage heating, level access showers, aids and adaptations and planned warm air units are to be delayed. These will be built into the HRA Business Plan for future years to ensure any delayed work is still completed in the future.

Capital Reserves

- 4.15 Reserves are held by the Council for capital purposes either generated through sales of assets, setting aside sums from underspends and receipts of grants for capital purposes.
- 4.16 The Council's capital reserve position at the end of March 2024 is as follows.

	2023/24 £
Capital Receipts	622,010
Capital Grants	13,386,582
Earmarked Capital	2,417,687
General Fund Total	16,426,279
Capital Grants	351,065
Capital Receipts	825,714
1-4-1 Receipts	2,896,711
Earmarked Capital	3,773,387
Major Repairs Reserve	2,020,823
HRA Total	9,867,700
NBBC Total	<u>26,293,979</u>

- 4.17 Capital reserves are allocated against specific projects with no residual unallocated amount available. This poses risks to any movement in the projected capital expenditure as there is nothing available to cover any fluctuations in expenditure.

Budget Updates

2025/26

- 4.18 The capital budget for 2024/25 was approved at Council on 21st February 2024 and included a forecast of expected capital projects for future years. S106 funds have been secured and a plan to spend in 2025/26 has been drawn up. Approval to spend allocated funding is required however prior to procurement processes commencing.

- 4.19 Projects proposed for approval are as follows:

- Sandon/Weddington Cycleway £244,567
- Coronation Walk Footpath/Cycleway £248,488
- Clovelly Way Footpath £31,675
- Lilleburne Play Area (refurbishment) £26,448
- Bermuda Balancing Lake – natural play trail £19,835

- 4.20 The proposed projects are fully funded by S106 and require no General Fund contribution.

2024/25

- 4.21 A budget for £100,000 was approved for review and surveys of Marston Lane Cemetery and potential extension due to the lack of burial space within the Borough.

- 4.22 The cost to extend this cemetery is far in excess of the budget provision and is under review corporately.

- 4.23 Due to regular flooding at Attleborough and Bucks Hill cemeteries in recent years, it is proposed to transfer the remaining balance from Marston Lane to perform works at these two cemeteries to mitigate flooding issues. Work will be undertaken with flooding experts from Warwickshire County Council. The balance proposed to transfer is £84,000.

- 4.24 The works required to the cemeteries is revenue in nature and so it is proposed to remove from the capital budget and increase the revenue budget. Funding is from general earmarked reserves not specific to projects and earmarked reserves are revenue funding so it is therefore able to be transferred.

5. Conclusion

5.1 The capital programme is fully funded in its present form. The biggest risks to the Council are inflation, price increases for building supplies plus any delays which could occur result in funding being withdrawn.

5.2 Adjustments to the programme in light of the difficulties around cost and delivery will be reported to Cabinet but projects are continually under review for viability. Interest rates on projects where prudential borrowing is required will be carefully assessed for affordability prior to progressing.

6. Appendices

6.1 Appendix 1 – Q2 Forecasted General Fund Capital Outturn 2024/25

6.2 Appendix 2 – Q2 Forecasted Housing Revenue Account Capital Outturn 2024/25

7. Background Papers

7.1 None.

GENERAL FUND CAPITAL MONITORING

AS AT SEPTEMBER 2024

Project	Approved Budget	Current Forecast	Forecast Variance	Comments
Grayson Place	16,395,904	16,395,904	0	
Bridge to Living	1,654,819	1,654,819	0	
Parks Revival	1,605,807	1,605,807	0	
George Eliot Visitor Centre	222,500	222,500	0	
Corporation Street/Queens Road Junction	390,000	390,000	0	
E-mobility Hub	302,800	302,800	0	
Car Parking Machine Upgrades	300,000	300,000	0	
Business & Regeneration	20,871,830	20,871,830	0	
ICT Strategy Programme	100,000	100,000	0	
Camp Hill - Early final phase	25,000	25,000	0	
Resources and Customer Services	125,000	125,000	0	
Major Repairs	250,000	250,000	0	
Vehicle & Plant Replacement	683,000	683,000	0	
Environment Bill Food Waste Grant	981,000	981,000	0	
Leisure Strategy	227,609	227,609	0	
Fly Tipping Cameras	5,000	5,000	0	
Bedworth Physical Activity Hub	20,216,451	20,216,451	0	
Pauls Land Pavilion	10,500	10,500	0	
Sandon Park/Jack Whetstone Pavilion	26,859	26,859	0	
Cemetery Extension	100,000	100,000	0	
Play Area Improvements	75,000	75,000	0	

Pingles LC Decarbonisation Scheme	1,957,307	1,957,307	0
Leisure, Communities and Health	24,532,726	24,532,726	0
HEART	5,125,000	5,125,000	0
Empty Homes - Works in Default	40,000	40,000	0
Empty Property Loans	100,000	100,000	0
Homeless Hostel Conversion	125,000	125,000	0
Home Upgrade Grant 2	1,702,000	1,702,000	0
Attleborough - Community Park	100,000	100,000	0
Marlborough - Community Park	150,000	150,000	0
Sorrell Road - Community Park	225,000	225,000	0
Bedworth Market	716,184	716,184	0
Boundary Paddock Toilet Block Improvements	100,000	100,000	0
Housing	8,383,184	8,383,184	0
Capital General	100,000	100,000	0
TOTAL GENERAL FUND	54,012,740	54,012,740	0

HOUSING REVENUE ACCOUNT CAPITAL MONITORING

As At September 2024

Project	Approved Budget	Current Forecast	Forecast Variance	Comments
Decent Homes	1,200,000	1,350,000	150,000	Extra costs of enabling works
Roof Coverings/Modifications	900,000	900,000	0	
Windows & Doors	800,000	500,000	(300,000)	Programme budget reviewed and reduced
Sheltered Alarm Call System	40,000	10,000	(30,000)	Programme budget reviewed and reduced
Door Entry Scheme	0	93,000	93,000	Unexpected costs for door entry schemes in 2024/25
CCTV Renewal - GP Flats	0	8,000	8,000	Unexpected costs for CCTV renewal in 2024/25
Shop Improvements	15,000	149,000	134,000	A number of repairs have been identified for various properties
New Properties (Construction)	6,032,768	3,032,768	(3,000,000)	Delays with Armson and Cheveral will start in new year
Byford Court - Rebuild	680,432	570,432	(110,000)	Project delivered under budget
Conversion of The Gables	157,391	197,391	40,000	Extra work identified. 162k of spend will be moved to GF PD57
Fire Safety Works	2,400,000	2,780,000	380,000	Extra works identified
Conversion 196-198 Church Road	0	0	0	
Independent Living Unit - Remodelling	150,000	150,000	0	
Decent Homes Works - Homeless Hostel	167,000	20,000	(147,000)	Programme budget reviewed and reduced
Clever Gardens	360,000	360,000	0	
Warm Air Units	200,000	0	(200,000)	Delayed until 25/26
Electric Storage Heating	300,000	50,000	(250,000)	Programme reduced
New Street	1,365,000	1,365,000	0	
Acquisition of Properties	115,473	115,473	0	
25 Cheveral Place - Conversion of Wardens	68,555	70,555	2,000	
Concrete/Structural Repairs	190,000	400,000	210,000	Additional structural repairs have been identified

Level Access Showers	700,000	550,000	(150,000)	Programme budget reviewed and reduced
Aids & Adaptations	1,000,000	900,000	(100,000)	Programme budget reviewed and reduced
Central Heating	720,000	720,000	0	
Garages	15,000	15,000	0	
Slabs to Tarmac	304,500	304,500	0	
Lift Renewal Works	50,000	0	(50,000)	Delayed until 25/26
Door Entry System	0	0	0	
District Heating Upgrade Works	150,000	150,000	0	
PIR Electrical Works (Sheltered Housing & Communal)	396,000	606,000	210,000	Extra work identified whilst carrying out EICR's
Voids	800,000	800,000	0	
Stock Condition Survey	0	95,000	95,000	Final phase of Stock Condition Surveys
Structural/Concrete Repairs	2,400,000	2,400,000	0	
Environmental Works	0	0	0	
Contingency	200,000	165,000	(35,000)	
Capital Salaries	470,000	520,000	50,000	Requirement to use consultants at present due to the volume of contracts that require monitoring as a result of high turnover of our internal surveyors.

Total HRA

22,347,119 19,347,119 (3,000,000)