Broxtowe Borough COUNCIL

Monday, 21 July 2025

Dear Sir/Madam

A meeting of the Cabinet will be held on Tuesday, 29 July 2025 in the Council Offices, Foster Avenue, Beeston, NG9 1AB, commencing at 6.00 pm.

Should you require advice on declaring an interest in any item on the agenda, please contact the Monitoring Officer at your earliest convenience.

Yours faithfully

Ruth E Hyde

Chief Executive

To Councillors:

M Radulovic MBE (Chair)	R D MacRae
G Marshall (Vice-Chair)	J W McGrath
G Bunn	H E Skinner
C Carr	V C Smith
T A Cullen	E Williamson

A G E N D A

1. Apologies

   To receive apologies and to be notified of the attendance of substitutes.

2. Declarations of Interest (Pages 5 - 12)

   Members are requested to declare the existence and nature of any disclosable pecuniary interest and/or other interest in any item on the agenda.

3. Minutes (Pages 13 - 18)

   Cabinet is asked to confirm as a correct record the minutes of the meeting held on 1 July 2025.

4. Scrutiny Reviews (Pages 19 - 22)

The purpose of this report is to make members aware of matters proposed for and undergoing scrutiny.

5. Minutes from other meetings

5.1 Minutes of the UKSPF Advisory Panel meeting on 13 June 2025 (Pages 23 - 26)

6. Resources and Personnel Policy

6.1 Citizens Advice Central Nottinghamshire (Pages 27 - 36)

To provide Cabinet with an update on activity at the Broxtowe Division of Citizens Advice Central Nottinghamshire and approve the release of the second year of grant aid funding as approved by Cabinet in July 2024.

6.2 Local Government Reorganisation (Pages 37 - 168)

To provide an update on Local Government Reorganisation in Nottinghamshire.

7. Housing

7.1 Empty Homes Strategy 2025-2030 (Pages 169 - 190)

To update the Empty Homes Strategy in accordance with the Council's corporate priority - Housing – a good quality home for everyone.

7.2 Asset Management Strategy (Pages 191 - 200)

The Asset Management Strategy is in the process of being refreshed in accordance with the Council’s Corporate Priority of Housing – a good quality home for everyone.

7.3 Housing Delivery Plan (Pages 201 - 216)

The Housing Delivery Plan is in the process of being refreshed in accordance with the Council's Corporate Priority of Housing, a good quality home for everyone.

7.4 Homes England Compliance Audit Report (Pages 217 - 222)

For Cabinet to acknowledge the positive outcome of the Homes England compliance audit in accordance with the Council's Corporate Priority of Housing – a good quality home for everyone.

8. Leisure and Health

8.1 Annual Food Safety Service Plan 2025-2026 (Pages 223 - 240)

To advise Members of and seek approval for the Food Safety Service Plan 2025/26. This is in accordance with the Council's corporate vision of "A greener, safer healthier Broxtowe where everyone prospers."

9. Environment and Climate Change

9.1 Contaminated Land Strategy 2025-2030 (Pages 241 - 324)

To seek approval for the updated Contaminated Land Strategy in accordance with the Corporate Priority of Environment – protect the environment for the future.

9.2 Annual Air Quality Status Report 2025 (Pages 325 - 446)

To advise Members of the latest Air Quality Status Report which has been submitted to the Department of Food Environment and Rural Affairs (DEFRA). This is in accordance with the Council's Corporate Priority of Environment – protect the environment for the future and Community Safety – a safe place for everyone.

9.3 Vehicle Fleet Replacement Programme Reallocation of the Capital Budgets (Pages 447 - 450)

The purpose of the report is to seek approval for the reallocation of a proportion of the capital expenditure budget for fleet vehicle procurement, from both the 2027/28 and 2026/27 programmes to the 2025/26 programme.

10. Community Safety

10.1 Revised Childrens Safeguarding Policy 2025-28 (Pages 451 - 492)

To review and approve the revised Safeguarding Children Policy 2025-28. This is in accordance with the Council's Corporate Priority of Community Safety.

10.2 Safeguarding Adults Policy (Pages 493 - 552)

To approve the Safeguarding Adults Policy 2025-28. This is in accordance with the Council's Corporate Priority of Community Safety – A Safe Place for Everyone.

10.3 Slavery Statement 2024 (Pages 553 - 568)

To seek approval for the annually reviewed and updated Slavery and Human Trafficking Statement 2024/25 and for its publication on the Council's website and the Home Office's modern slavery statement portal. This is in accordance with the Council's Corporate Priority of Community Safety.

10.4 Approval to Consult on PSPO Renewals (Pages 569 - 572)

To seek approval to consult on the renewal of the Boroughs Public Space Protection Orders.

11. Economic Development and Asset Management

11.1 High Street Retail Auctions Eastwood extension and update (Pages 573 - 576)

This is a noting report to update Members on the work that has now commenced in bringing in this new pilot measure into Eastwood.

12. Cabinet Work Programme (Pages 577 - 578)

Cabinet is asked to approve its Work Programme, including potential key decisions that will help to achieve the Council's key priorities and associated objectives.

13. Exclusion of Public and Press

The Committee is asked to RESOLVE that, under Section 100A of the Local Government Act, 1972, the public and press be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Schedule 12A of the Act.

14. Bramcote Leisure Centre - Planning Approval and RIBA 4 (Pages 579 - 582)

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Report of the Monitoring Officer

DECLARATIONS OF INTEREST

1. Purpose of Report

Members are requested to declare the existence and nature of any disclosable pecuniary interest and/or other interest in any item on the agenda. The following information is extracted from the Code of Conduct, in addition to advice from the Monitoring Officer which will assist Members to consider any declarations of interest.

Part 2 – Member Code of Conduct
General Obligations:

10. Interest

10.1 You will register and disclose your interests in accordance with the provisions set out in Appendix A.

Section 29 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of interests of Members of the Council. The register is publically available and protects you by demonstrating openness and willingness to be held accountable. You are personally responsible for deciding whether or not you should disclose an interest in a meeting which allows the public, Council employees and fellow Councillors know which of your interests gives rise to a conflict of interest. If in doubt you should always seek advice from your Monitoring Officer.

You should note that failure to register or disclose a disclosable pecuniary interest as defined in Appendix A of the Code of Conduct, is a criminal offence under the Localism Act 2011.

Advice from the Monitoring Officer:

On reading the agenda it is advised that you:

1. Consider whether you have any form of interest to declare as set out in the Code of Conduct.
2. Consider whether you have a declaration of any bias or predetermination to make as set out at the end of this document
3. Update Democratic Services and the Monitoring Officer and or Deputy Monitoring Officers of any declarations you have to make ahead of the meeting and take advice as required.
4. Use the Member Interest flowchart to consider whether you have an interest to declare and what action to take.
5. Update the Chair at the meeting of any interest declarations as follows:

'I have an interest in Item xx of the agenda'

‘The nature of my interest is …… therefore the type of interest is DPI/ORI/NRI/BIAS/PREDETEMINATION
‘The action I will take is...’

This will help Officer record a more accurate record of the interest being declared and the actions taken. You will also be able to consider whether it is necessary to send a substitute Members in your place and to provide Democratic Services with notice of your substitute Members name.

Note: If at the meeting you recognise one of the speakers and only then become aware of an interest you should declare your interest and take any necessary action

6. Update your Member Interest Register of any registerable interests within 28days of becoming aware of the Interest.

Ask yourself do you have any of the following interest to declare?

1. DISCLOSABLE PECUNIARY INTERESTS (DPIs)

A “Disclosable Pecuniary Interest” is any interest described as such in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 and includes an interest of yourself, or of your Spouse/Partner (if you are aware of your Partner's interest) that falls within the following categories: Employment, Trade, Profession, Sponsorship, Contracts, Land, Licences, Tenancies and Securities.

2. OTHER REGISTERABLE INTERESTS (ORIs)

An “Other Registerable Interest” is a personal interest in any business of your authority which relates to or is likely to affect:

a) any body of which you are in general control or management and to which you are nominated or appointed by your authority; or
b) any body
(i) exercising functions of a public nature
(ii) anybody directed to charitable purposes or
(iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)
of which you are a Member or in a position of general control or management.

3. NON-REGISTRABLE INTERESTS (NRIs)

“Non-Registrable Interests” are those that you are not required to register but need to be disclosed when a matter arises at a meeting which directly relates to your financial interest or wellbeing or a financial interest or wellbeing of a relative or close associate that is not a DPI.

A matter “directly relates” to one of your interests where the matter is directly about that interest. For example, the matter being discussed is an application about a particular property in which you or somebody associated with you has a financial interest.

A matter “affects” your interest where the matter is not directly about that interest but would still have clear implications for the interest. For example, the matter concerns a neighbouring property.

Declarations and Participation in Meetings

1. DISCLOSABLE PECUNIARY INTERESTS (DPIs)

1.1 Where a matter arises at a meeting which **directly relates** to one of your Disclosable Pecuniary Interests which include both the interests of yourself and your partner then:

Action to be taken

- **you must disclose the nature of the interest** at the commencement of that consideration, or when the interest becomes apparent, whether or not such interest is registered in the Council’s register of interests of Member and Co-opted Members or for which you have made a pending notification. If it is a sensitive interest you do not have to disclose the nature of the interest, just that you have an interest

- **you must not participate in any discussion** of that particular business at the meeting, or if you become aware of a disclosable pecuniary interest during the meeting you must not participate further in any discussion of the business, including by speaking as a member of the public

- **you must not participate in any vote** or further vote taken on the matter at the meeting and

- **you must withdraw from the room** at this point to make clear to the public that you are not influencing the meeting in anyway and to protect you from the criminal sanctions that apply should you take part, unless you have been granted a Dispensation.

2. OTHER REGISTERABLE INTERESTS (ORIs)

2.1 Where a matter arises at a meeting which **directly relates** to the financial interest or wellbeing of one of your Other Registerable Interests i.e. relating to a body you may be involved in:

- **you must disclose** the interest at the commencement of that consideration, or when the interest becomes apparent, whether or not such interest is registered in the Council’s register of interests of Member and Co-opted Members or for which you have made a pending notification. If it is a sensitive interest you do not have to disclose the nature of the interest, just that you have an interest

- **you must not take part in any discussion or vote** on the matter, but may speak on the matter only if members of the public are also allowed to speak at the meeting

- **you must withdraw from the room** unless you have been granted a Dispensation.

3. NON-REGISTRABLE INTERESTS (NRIs)

3.1 Where a matter arises at a meeting, which is not registrable but may become relevant when a particular item arises i.e. interests which relate to you and /or other people you are connected with (e.g. friends, relative or close associates) then:

- **you must** disclose the interest; if it is a sensitive interest you do not have to disclose the nature of the interest, just that you have an interest
- **you must not take part in any discussion or vote,** but may speak on the matter only if members of the public are also allowed to speak at the meeting; and
- **you must withdraw** from the room unless you have been granted a Dispensation.

Dispensation and Sensitive Interests

A "Dispensation" is agreement that you may continue to participate in the decision-making process notwithstanding your interest as detailed at section 12 of the Code of the Conduct and the Appendix.

A "Sensitive Interest" is as an interest which, if disclosed, could lead to the Member, or a person connected with the Member, being subject to violence or intimidation. In any case where this Code of Conduct requires to you to disclose an interest (subject to the agreement of the Monitoring Officer in accordance with paragraph 2.4 of this Appendix regarding registration of interests), you do not have to disclose the nature of the interest, if it is a Sensitive Interest in such circumstances you just have to disclose that you have a Sensitive Interest under S32(2) of the Localism Act 2011. You must update the Monitoring Officer when the interest is no longer sensitive, so that the interest can be recorded, made available for inspection and published.

BIAS and PREDETERMINATION

The following are not explicitly covered in the code of conduct but are important legal concepts to ensure that decisions are taken solely in the public interest and not to further any private interests.

The risk in both cases is that the decision maker does not approach the decision with an objective, open mind.

This makes the local authority's decision challengeable (and may also be a breach of the Code of Conduct by the Councillor).

Please seek advice from the Monitoring Officer or Deputy Monitoring Officers, if you need assistance ahead of the meeting.

BIAS

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias. If you have been involved in an issue in such a manner or to such an extent that the public are likely to perceive you to be bias in your judgement of the public interest:

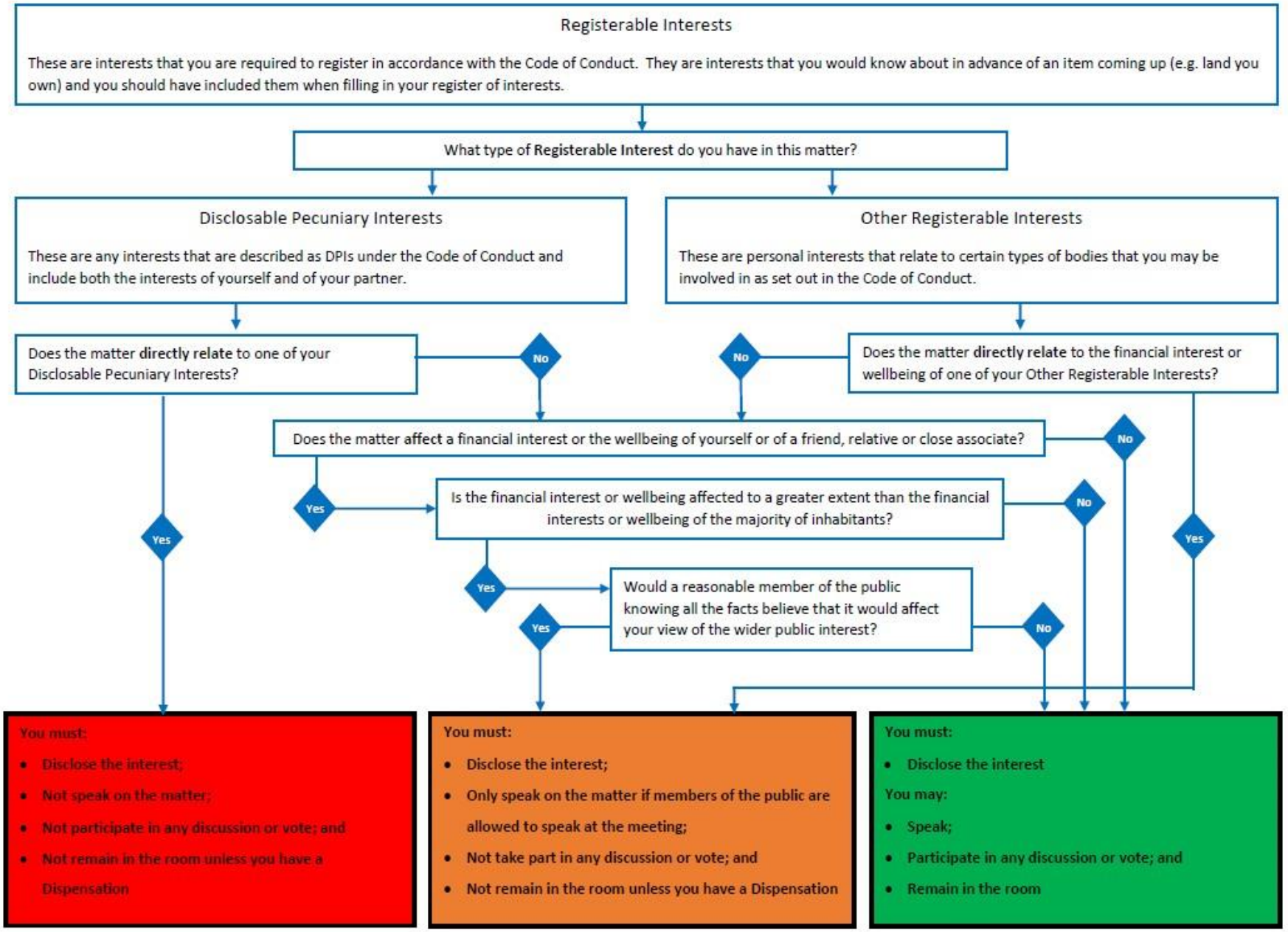
a) you should not take part in the decision-making process
b) you should state that your position in this matter prohibits you from taking part
c) you should leave the room.

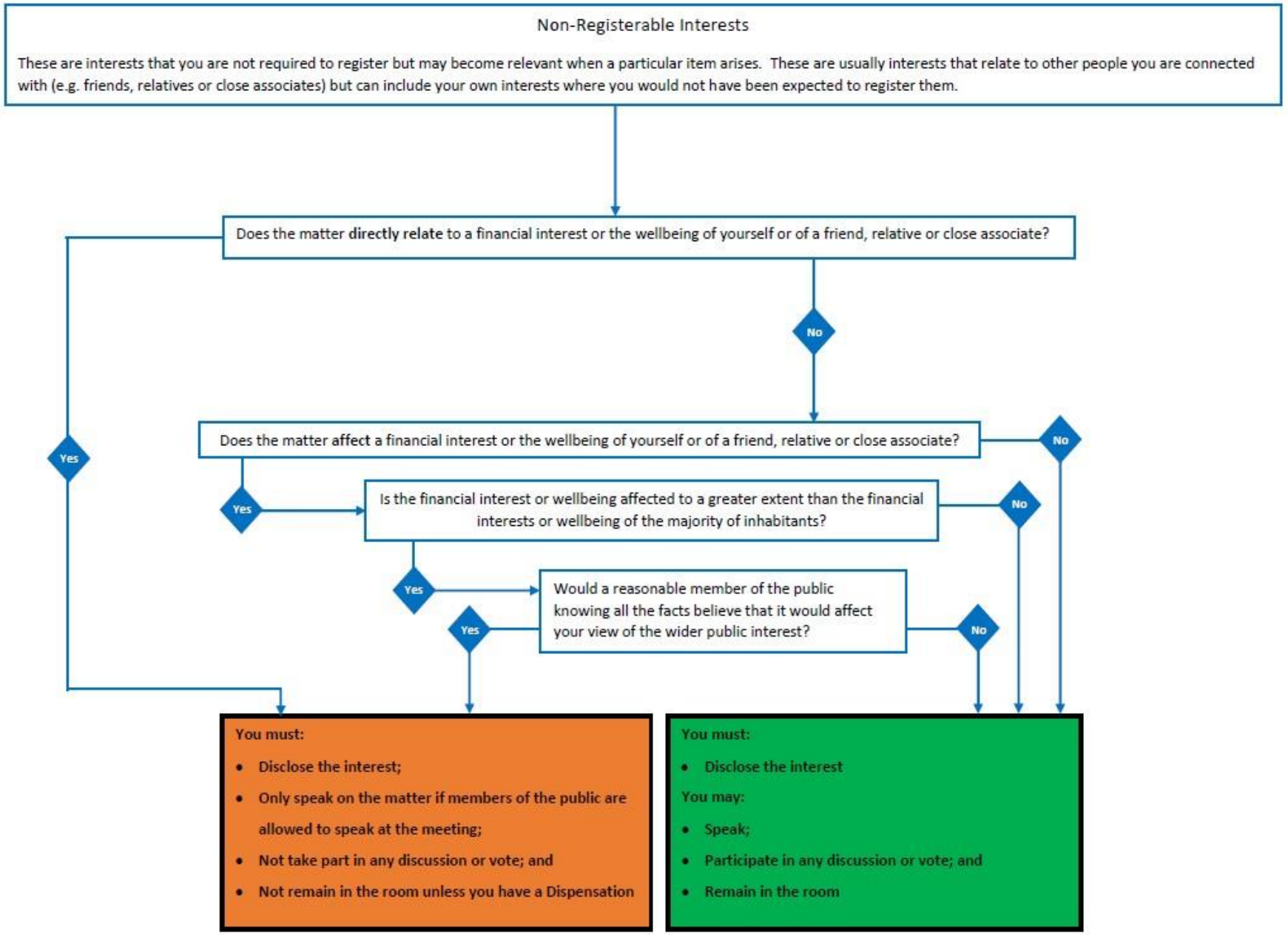
PREDETERMINATION

Where a decision maker has completely made up his/her mind before the decision is taken or that the public are likely to perceive you to be predetermined due to comments or statements you have made:

a) you should not take part in the decision-making process
b) you should state that your position in this matter prohibits you from taking part
c) you should leave the room.

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Registerable Interests
These are interests that you are required to register in accordance with the Code of Conduct. They are interests that you would know about in advance of an item coming up (e.g. land you own) and you should have included them when filling in your register of interests.
What type of Registerable Interest do you have in this matter?
Disclosable Pecuniary Interests
These are any interests that are described as DPIs under the Code of Conduct and include both the interests of yourself and of your partner.
Other Registerable Interests
These are personal interests that relate to certain types of bodies that you may be involved in as set out in the Code of Conduct.
Does the matter directly relate to one of your Disclosable Pecuniary Interests?
No
No
Does the matter directly relate to the financial interest or wellbeing of one of your Other Registerable Interests?
Does the matter affect a financial interest or the wellbeing of yourself or of a friend, relative or close associate?
No
Yes
Is the financial interest or wellbeing affected to a greater extent than the financial interests or wellbeing of the majority of inhabitants?
No
Yes
Yes
Yes
Would a reasonable member of the public knowing all the facts believe that it would affect your view of the wider public interest?
Yes
No
You must:
Disclose the interest;
Not speak on the matter;
Not participate in any discussion or vote; and
Not remain in the room unless you have a Dispensation
You must:
Disclose the interest;
Only speak on the matter if members of the public are allowed to speak at the meeting;
Not take part in any discussion or vote; and
Not remain in the room unless you have a Dispensation
You must:
Disclose the interest
You may:
Speak;
Participate in any discussion or vote; and
Remain in the room


Non-Registerable Interests
These are interests that you are not required to register but may become relevant when a particular item arises. These are usually interests that relate to other people you are connected with (e.g. friends, relatives or close associates) but can include your own interests where you would not have been expected to register them.
Does the matter directly relate to a financial interest or the wellbeing of yourself or of a friend, relative or close associate?
No
Does the matter affect a financial interest or the wellbeing of yourself or of a friend, relative or close associate?
No
Yes
Yes
Is the financial interest or wellbeing affected to a greater extent than the financial interests or wellbeing of the majority of inhabitants?
No
Yes
Would a reasonable member of the public knowing all the facts believe that it would affect your view of the wider public interest?
Yes
No
You must:
Disclose the interest;
Only speak on the matter if members of the public are allowed to speak at the meeting;
Not take part in any discussion or vote; and
Not remain in the room unless you have a Dispensation
You must:
Disclose the interest
You may:
Speak;
Participate in any discussion or vote; and
Remain in the room

CABINET

TUESDAY, 1 JULY 2025

Present: Councillor M Radulovic MBE, Chair

Councillors: G Marshall (Vice-Chair)
G Bunn
C Carr
T A Cullen
R D MacRae
J W McGrath
H E Skinner
V C Smith
E Williamson

14 APOLOGIES

There were no apologies for absence.

15 DECLARATIONS OF INTEREST

Councillor M Radulovic MBE declared an other-registerable interest in item 6.6 as he is a member of Eastwood Town Council, minute number 19.6 refers.

Councillor C Carr declared an other-registerable interest in item 6.1 as he is a member of the Kimberley Means Board, minute number 19.1 refers.

Councillor J W McGrath declared an other-registerable interest in item 6.1 as he is a member of the Stapleford Town Board, minute number 19.1 refers.

Councillor R D MacRae declared other-registerable interests in items 6.1, 8.2 and 8.3 as he is a member of the Stapleford Town Board, resides in a Council property and has a Council garage, minute numbers 19.1, 21.2 and 21.3 refer respectively.

16 MINUTES

The minutes of the meeting held on 3 June 2025 were confirmed and signed as a correct record.

17 LOCAL GOVERNMENT REORGANISATION

Members received a report the latest position on Local Government Reorganisation in accordance with the requirement of Government to submit a final business case for local government reorganisation in Nottinghamshire. A number of queries were raised which included dismay at proposals to join with Nottinghamshire City Council, the lack of needs-based assessments within the proposals and disagreement with any statements that suggested the reorganisation would save money. The

recommendation was widened to include substitutes for the sub group should the group leaders be unable to attend.

RESOLVED to create a sub group of all group leaders, or their nominated representatives, to discuss and develop any proposals relating to public engagement should that become necessary in between ordinary scheduled Cabinet meetings.

Reason
This is in accordance with the requirement of Government to submit a final business case for local government reorganisation in Nottinghamshire.

18 SCRUTINY REVIEWS

Cabinet noted the matters proposed for and undergoing scrutiny.

19 RESOURCES AND PERSONNEL POLICY

19.1 STATEMENT OF ACCOUNTS UPDATE AND OUTTURN POSITION 2024/25

Cabinet was updated on the revenue and capital outturn position for 2024/25, and provided with an update on progress with the preparation of the draft annual statement of accounts for 2024/25.

The accounts for 2024/25 had been finalised, subject to audit, and showed an underspending on the General Fund revenue account of £1.402m and an underspending on the Housing Revenue Account (HRA) of £534k when compared to the revised estimates. There was praise for the officers who had prepared the report and it was highlighted that despite the excellent figures these were difficult times for local government finances.

RESOLVED that the:

1. **Accounts summary for the financial year ended 31 March 2025, subject to audit, be approved.**
2. **Revenue budget carry forward requests outlined in the report be approved and included as supplementary revenue estimates in the 2025/26 budget.**
3. **Capital budget carry forward requests outlined in the report be approved and included as supplementary capital estimates in the 2025/26 budget.**

Reason
To be accountable for all activities and actions and to ensure that the Council conforms to all financial regulations. The report summarises the Council's finances at the end of each financial year.

(Having declared other registerable interests Councillors C Carr, R D MacRae and J W McGrath, left the meeting before discussion or voting thereon.)

19.2 TREASURY MANAGEMENT AND PRUDENTIAL INDICATORS ANNUAL REPORT FOR THE YEAR ENDED 31 MARCH 2025

Cabinet noted the Treasury Management and Prudential Indicators Annual Report for the year ended 31 March 2025. The report met the requirements of both the CIPFA Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities. The Council was required to comply with both Codes through regulations issued under the Local Government Act 2003.

19.3 PERFORMANCE MANAGEMENT REVIEW OF BUSINESS PLANS - OUTTURN REPORT 2024/25

Cabinet noted a report which outlined progress against outcome targets linked to Corporate Plan priorities and received an update as to the latest financial performance as measured against the budget. Areas of concern were highlighted, and it was stated that there were ambitious targets within the report.

19.4 COMPLAINT REPORT 2024/25

Members were provided with a summary of complaints made against the Council and noted a report which outlined the performance of the Council in dealing with complaints, at stage one by the service areas, at stage two by the Complaints and Compliments Officer and at stage three when complaints are referred to the Local Government Ombudsman or Housing Ombudsman.

19.5 RECRUITMENT AND SELECTION POLICY

The Council had been working closely with HMP Ranby, exploring initiatives on the employability of ex-offenders and reintegrating them into society and the workplace.

It was stated that the Council understood its role within the County as a large employer and its duty to work with other agencies and Government departments to play a part in proactively engaging with ex-offenders who may have appropriate skills that could be utilised across the workforce. The Recruitment and Selection Policy was to be amended to include a paragraph outlining that the Council reserved the right to explore employment initiatives to target particular groups who may experience barriers during recruitment processes.

RESOLVED that the Recruitment and Selection Policy be amended to include paragraphs outlining initiatives to target particular groups who may experience barriers during recruitment processes, explanation of the process for the recruitment of Assistant Directors and above and clarification regarding starting salary for roles.

Reason
This is in accordance with the Council's aim to invest in our towns and people.

19.6 GRANT AID REQUESTS FROM PARISH/TOWN COUNCILS

Cabinet considered the request for grant assistance within the protocol for the consideration of grant aid to Parish and Town Councils. Eastwood Town Council had requested a grant of £4,149 towards the cost of security, first aid, hire of stage and sound equipment for the 'Bloomin Marvellous' Festival 2025.

RESOLVED that grant aid assistance of £4,149 be awarded to Eastwood Town Council.

Reason
As part of the Protocol, Grant Aid would only be given in support of specific projects or services and not as a general grant towards the services provided by a Parish/Town Council. There was no budgetary provision for Capital grants to Parish Councils. The grant aid request was in line with the current Corporate Plan aims for supporting people to live well and provide a safe place for everyone.

(Having declared an other-registerable interest Councillor M Radulovic MBE, left the meeting before discussion or voting thereon. Councillor G Marshall took the Chair for the item.)

20 ECONOMIC DEVELOPMENT AND ASSET MANAGEMENT

20.1 REDUCTION OF CARBON IN NEW DEVELOPMENT SUPPLEMENTARY PLANNING DOCUMENT

Supplementary Planning Documents (SPD) are documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on specific issues. SPDs are a material consideration in planning decisions but are not part of the statutory development plan.

The Reduction in Carbon in New Development SPD is a joint document produced in collaboration with Nottingham City Council and provides detailed guidance on reducing carbon emissions in new developments, supporting policies in the Greater Nottingham Aligned Core Strategies and the Part 2 Local Plans. Nottingham City Council adopted the SPD on 17 June.

It was requested that case studies from Broxtowe be included in future versions of the document in addition to consideration of circadian rhythms.

RESOLVED that the Reduction of Carbon in New Development as a Supplementary Planning Document, be adopted.

Reason
The SPD seeks to contribute to the Council's Environment Objective of reducing carbon emissions and improving air quality.

21 HOUSING

21.1 TENANT SATISFACTION MEASURES

Cabinet noted the Tenant Satisfaction Measures survey results which the Regulator of Social Housing use to assess how well social housing landlords were performing. The results were reported to the Regulator and would provide information to tenants and others so that they can compare the performance of their landlord with others and see where their landlord needs to improve. It was stated that work had taken place with the Complaints Team to improve the service and learn from the experiences of residents and tenants.

RESOLVED that the associated action plan be approved.

Reason
This is in accordance with the Council's Corporate Priority of Housing – a good quality home for everyone

21.2 AMENDMENTS TO THE RECHARGES POLICY

Members were informed that one of the actions within the Housing Business Plan was to increase recharges. It was stated that the revised Policy set out the refreshed criteria under which the Council may recharge the tenant or the leaseholder when remedial work was carried out, which had arisen following a breach of the Tenancy or Leaseholder Agreement.

RESOLVED that the changes to the Recharges Policy be approved.

Reason
This is in accordance with the Council's Corporate Priority of Housing – a good quality home for everyone

(Having declared an other-registerable interest in the item Councillor R D MacRae left the meeting before discussion or voting thereon.)

21.3 GARAGE MANAGEMENT POLICY

The Council owns 789 garages on various sites throughout the Borough, these are let via a licence for a monthly fee. The Policy outlines the rights and responsibilities of garage licensees and how the Council will allocate and manage garages. This includes how garages will be repaired and maintained. Amendments had been made to the Policy for matters relating to decants and insurance. Other minor amendments have been made for clarity and to update the policy with new job titles.

RESOLVED that the updated Garage Management Policy be approved.

(Having declared an other-registerable interest in the item Councillor R D MacRae left the meeting before discussion or voting thereon.)

22 ENVIRONMENT AND CLIMATE CHANGE

22.1 CLIMATE CHANGE AND GREEN FUTURES REVIEW

In 2019, the Council made an ambitious commitment to become carbon neutral by 31 December 2027. There were 913 days remaining, as of 1 July 2025, to achieve this target. In 2020, the Council created its Climate Change and Green Futures Programme with supporting Carbon Management Action Plan (CMAP) to provide strategic direction with regards to achieving this target. This was revised and adopted in July 2023. Due to the rapidly evolving nature of this subject, a full review and refresh of both documents was completed and adopted in March 2024. It was stated that this was one of the flagship policies that the Council should be proud of.

RESOLVED that the revised Carbon Management Action Plan for 2025/26 be approved.

Reason
This is in accordance with the Council's corporate priority of 'Protecting the environment for the future'

22.2 BLUE/GREEN INFRASTRUCTURE STRATEGY PUBLIC CONSULTATION

The creation of the Council's first Green Infrastructure Strategy 2015-2030 was to provide a clear strategic pathway for the management and enhancement of the Borough's Green Infrastructure. It was also to be used to inform planning decisions, identify opportunities to improve the green corridors and to provide information on how the Borough's network contributed to the local, regional and national picture. The revised Strategy's structure is based on the principles outlined within Natural England's Green Infrastructure Framework.

RESOLVED that the public consultation on the Blue/Green Infrastructure Strategy be approved.

Reason
This is in accordance with the Council's Corporate Plan Environment Objective: 'Protect the environment for the future'.

23 CABINET WORK PROGRAMME

Cabinet considered the Work Programme, including potential key decisions that would help to achieve the Council's key priorities and associated documents.

RESOLVED that the Work Programme, including key decisions, be approved.

Reason
The items included in the Work Programme will help to achieve the Council's key priorities and associated objectives.

24 EXCLUSION OF PUBLIC AND PRESS

RESOLVED that, under Section 100A of the Local Government Act, 1972, the public and press be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Schedule 12A of the Act.

25 GREEN REWARDS REVIEW AND RESIDENT SURVEY

RESOLVED that the public consultation on the Blue/Green Infrastructure Strategy be approved.

Cabinet **29 July 2025**

Report of the Monitoring Officer

Scrutiny Reviews

1. Purpose of Report

The purpose of this report is to make Members aware of matters proposed for and undergoing scrutiny. This is in accordance with all the Council's priorities.

2. Recommendation

Cabinet is asked to NOTE the report.

3. Detail

At its meeting of 26 June 2025, the Overview and Scrutiny Committee received an update on the GamCare responses from the Licensing Manager and gave consideration to the Annual Report on Scrutiny.

The Committee formed a Task and Finish group to consider the issue of Cemetery Memorials. The group will meet in late July to scope the review.

Cabinet will receive updates at each future meeting as to the progress of the Overview and Scrutiny Committee's work programme as contained in the attached **Appendix** and is asked to consider the future programme and decision-making with knowledge of the forthcoming scrutiny agenda. The work programme also enables Cabinet to suggest topics for future scrutiny.

4. Key Decision

This report is not a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

5. Updates from Scrutiny

Not applicable.

6. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

There are no direct financial implications arising from this report.

7. Legal Implications

   The comments from the Monitoring Officer / Head of Legal Services were as follows:

   Whilst there are no legal implications arising from the report, under Section 9F of the Local Government Act 2000, Overview and Scrutiny Committee has the power to make reports or recommendations to Cabinet on matters which affect the Council's area or the inhabitant of its area.

8. Human Resources Implications

   The comments from the Human Resources Manager were as follows:

   Not applicable.

9. Union Comments

   The Union comments were as follows:

   Not applicable

10. Climate Change Implications

    The climate change implications are contained within the report.

11. Data Protection Compliance Implications

    This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    Not required.

13. Background Papers

    Nil.

Appendix

1. Topics Agreed by the Overview and Scrutiny Committee

	Topic	Topic suggested by	Link to corporate priorities/values
1.	Child Poverty	Overview and Scrutiny Committee	Support people to live well, A good quality home for everyone
2.	Budget Consultation	Overview and Scrutiny Committee	All Corporate Priorities
3.	Building Control	Councillor B C Carr agreed by the Overview and Scrutiny Committee to put on hold.	A good quality home for everyone
4.	Committee Agendas	Councillor T Marsh	Protect the environment for the future.
5.	Environmental Enforcement Fines	Cabinet	Protect the environment for the future.
6.	Cemetery Memorial Review	Cabinet	Community Safety – A safe place for everyone.

2. Update Reviews

	Topic	Topic suggested by	Link to corporate priorities/values	Proposed Date to Overview and Scrutiny Committee
1.	Markets in the Borough	Overview and Scrutiny Committee	Invest in our towns and our people	September 2025

	Topic	Topic suggested by	Link to corporate priorities/values	Proposed Date to Overview and Scrutiny Committee
2.	D.H. Lawrence Museum	Overview and Scrutiny Committee	Invest in our towns and our people.	September 2025
3.	Equality, Diversity and Inclusion at the Council. (Report to Cabinet 3 September 2024)	Councillor S Dannheimer	Invest in our towns and our people, Support people to live well, Protect the environment for the future, and a good quality home for everyone.	Date to be confirmed.

UK SHARED PROSPERITY FUND ADVISORY PANEL (Via Teams)

Friday 13th June 2025

Present:

Councillor G Marshall (Chair)
Councillor G Bunn
Councillor R MacRae
Councillor P Owen

Apologies: Milan Radulovic
Councillor Bales
Ruth Hyde

Officers: Mr Z Darr
Mr J Little
Ms C Gault
Ms R Sharp

1. Declarations of Interest

RM is the Chair of Broxtowe Youth Homelessness and GB is the co-founder of Broxtowe Community Projects and has an interest in food banks and will abstain.

2. Minutes

2 .1 Year 4 UKSPF Business Grants

A total of £160,000 has been ringfenced for business grants-nearly £100K less than last year. Two types of scheme are being supported. £148,000 allocated specifically for Business Growth Grants. Grant values range from £2,000 to £7,000, with varying match-funding requirements. Eligible improvements include shopfront enhancements, increased productivity, and job creation.

Decision: The panel endorsed the business grants scheme with the agreed amendment to include a wider impact assessment in the application form. Agreement was recommended to the S151 Officer who has overall sign-off.

£12,000, ring fenced for a "Start Your Business with Broxtowe" grant. Funding of up to £1,000 is available for new startups. Applicants should attend a Broxtowe LEA workshop and not be in receipt of other EMCCA start-up grants such as those run through NBV. Economic Development will liaise with NBV to ensure there is efficiency.

Decision: The Panel endorsed the pilot- start-up scheme. Agreement was recommended to the S151 Officer who has overall sign-off. The main grant scheme will launch before end of June, start-up to follow.

2.2 Reports and Information

The Panel considered a report from the Head of Economic Development and Regeneration and the UKSPF Programme Manager considering an update on the business cases from all funding projects, considered at the previous meeting but requiring more information for final decision. Most projects were endorsed for the S151 Officer (overall sign-off), but subject to the following notes comments and further actions.

2.3 UKSPF Place Capital Projects

2.3.1 Beeston Bandstand

Costs have been investigated, and a covered pergola structure might now be too expensive for the funds available. The Markets Manager has been exploring a retractable or bespoke cover. The events Friday 18 events programme showed the usefulness of the stage area. Cllr Bunn suggested a permanent, low-maintenance design would be preferable. Officers are to continue to explore solutions and report back.

2.3.1 Wayfinders and Visitor Signage

Cllr Owen asked for his opposition to be recorded and voiced concerns about the signs in his ward and the process. Part of this year's funding is to explore an interpretation board for Nuthall as well as other visitor attractions which were not obvious to visitors and people passing through the Borough. The Head of Economic Development & Regeneration agreed to review this project and work with all members on phase II.

2.4 UKSPF Place Revenue Projects

2.4.1 Food Bank Projects.

There are two separate food bank projects which had both applied for funding. The smaller project the 'Food Bank Co-ordination' has commenced, continuing from last year, this was noted.

'Food Banks - targeting CAB and Futures referrals' was discussed the problem here being that there was still insufficient information to determine a sensible way forwards. The sponsors had been exploring three options for a six-month pilot Sep-Feb at different estimated costs mixing volunteers and staff. (Precise figures had been promised by 20 June); Cllr MaCRae favoured a middle-ground approach but It

was thought sensible to see what the actual costs were and to circulate these with a recommendation for the panel to consider under written procedures. There was a potential “knock-on” impact on the funds available highlighted for decision in the Community Grants paper. This could also be explained in the paper.

2.4.2 Lime Bikes

All Cllrs discussed concerns about theft, vandalism, collections of stranded bikes and the visual impact. Cllr Bunn noted the mixed feedback as some people were finding the service valuable, she suggested a stronger relationship with provider. The £1,000 for this was to be paused pending further discussions to be undertaken with the service provider. The HoS agreed to engage with the company directly.

2.4.3 High Level Mine Water Heat Recovery Feasibility Project

Two quotes received the Mining Remediation Authority had a more extensive data source and experience but were slightly more expensive. This is a feature of the Walker Street project.

DECISION: Members recommended continuing to the S151 Officer and to proceed with the project at t the revised costs of £13,962.62

2.4.4 Events Budget

The Proms in the parks were well supported but there was a discussion as to why only town centres were chosen. There was widespread agreement to propose Proms in a broader range of locations diversifying beyond town centres. The green festival element was not supported, it was not a new activity, and the amount suggested for this element was too much. There was a preference for more Proms etc. and a need to ensure new activity underpins UKSPF objectives and economic and community activity. HOS to speak to Communications Team and report back to the panel.

2.4.5 Parking Loyalty Card Scheme.

Cllr Owen opposes the Parking Loyalty scheme. The scheme was explained in some more detail and that with the funding this year there may be some opportunities for subtle improvements and different incentives. Cllr Bunn reported that Broxtowe was still providing the cheapest parking in Nottinghamshire. Cllr Owen requested more information on the businesses taking up the scheme and the number of cards that had been issued. The rest of the panel supported the revised budget proposals for 2025/26.

Action: Head of Service to provide a noting report.

2.5 Community Grants Decisions

Applications have been assessed on value for money, community benefit and reliability. Total Allocation is £160,000 split equally between capital and revenue projects. The scheme was 3.3 times oversubscribed in a ratio of funding available to funding requested. The list of successful applications was endorsed in full (for S.151 Officer).

The panel requested that officers check that awarding UKSPF funding to the top-rated project, Transform Training's anti-ASB project, would not jeopardise the organisation's ability to apply to the recently announced Police & Crime Commissioner's Nottinghamshire-wide fund.

This left some very high scoring reserve projects and difficult choices. Two strong revenue projects were highlighted for decision, as only one could be supported with funds remaining. After much deliberation the Panel agreed to recommend supporting 50% of the ask from the Broxtowe Women's Project. .

DECISION: Support half of BWP scheme and recommend to S151 Officer.

2.5.1 Options for Capital only schemes.

There was a grant balance of £24,000 remaining. Cossall, Kimberley, Attenborough Village Hall, Chilwell Memorial Hall and Nottinghamshire Wildlife Trust had all supplied smaller capital only bids, that could in part or as a whole be supported. The Panel wished the funds to be spread around the smaller groups excluding Nottinghamshire Wildlife Trust. There were some issues which required some further investigation, including whether the schemes could be scaled to support more projects and if they were deliverable.

DECISION: A further written options paper provided and recommendations/ preferences by written procedures.

2.6 Distribution of Remaining Revenue

The overall Year 4 Programme having been allocated as per the discussions and decisions within the last 2 Panels now left just under £24,000 still to be allocated. There were several options ranging from completely allocating it amongst several projects, through to funding one extra project and maintaining a Programme reserve, (revenue can be converted to capital). Three strong projects were discussed. Your CVS, NCVS and Ridewise. There were concerns as to whether to fund a new CVS (Yours local but new over an established Nottingham based one. Ridewise provided good services but lacked sustainability once the funding was gone. There were information gaps, and it was not possible to determine an outcome with the information available. **Action:** officers to gather further information and circulate a recommendations paper for further consideration by the Panel.

3. AOB

Cllr Marshall thanked officers for their work. GB highlighted the Sea Scouts project as a valuable initiative. Should any budget be released later, consider revisiting support for this project.

4.Date of Next meeting: September TBC

Cabinet **29 July 2025**

Report of the Portfolio Holder for Resources and Personnel Policy

Citizens Advice Central Nottinghamshire – Grant Aid

1. Purpose of Report

To provide Cabinet with an update on activity at the Broxtowe Division of Citizens Advice Central Nottinghamshire and approve the release of the second year of grant aid funding as approved by Cabinet in July 2024.

2. Recommendation

Cabinet is asked to NOTE the report from Citizens Advice Central Nottinghamshire and RESOLVE to release the second year grant aid funding of £73,750 for 2025/26 accordingly.

3. Detail

In July 2024, Cabinet approved grant aid of £73,750 to the Broxtowe Division of Citizens Advice Central Nottinghamshire ("CACN Broxtowe"), which included £10,000 towards the annual rental of accommodation in the Council Offices. The resolution included a commitment to award grant aid at this level in both 2025/26 and 2026/27, subject to a suitable Service Level Agreement and monitoring being in place. This three-year funding settlement was seen to provide some much-needed stability for CACN Broxtowe and give it a platform to lever in additional funds from other sources.

Under the terms of the funding settlement and the Service Level Agreement, CACN Broxtowe has submitted its update report for 2024/25. This is presented in **Appendix 1** for consideration.

The overall budget for grants to voluntary organisations in 2025/26 is £168,800. An amount of £73,750 has been earmarked from the overall grant aid budget towards CACN Broxtowe.

4. Key Decision

This report is not a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

5. Updates from Scrutiny

Not applicable.

6. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

The overall budget for grants to voluntary organisations in 2025/26 includes an amount of £73,750 which has been earmarked for CACN Broxtowe. This includes £10,000 towards the rental obligation for the office accommodation at the Council Offices in Beeston.

7. Legal Implications

The comments from the Monitoring Officer / Head of Legal Services were as follows:

The Council is empowered to make grants to voluntary organisations by virtue of Section 48 Local Government Act 1985 (as well as other legislation). Having an approved process in line the legislation and the Council's Grant Aid Policy will ensure the Council's compliance with its legal duties.

8. Human Resources Implications

Not applicable.

9. Union Comments

Not applicable.

10. Climate Change Implications

No climate change implications have been identified in relation to this report.

11. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

As this is not a change to policy an equality impact assessment is not required.

13. Background Papers

Nil.

Appendix 1

Grant Aid – Citizens Advice Central Nottinghamshire, Broxtowe Division

Citizens Advice Central Nottinghamshire, Broxtowe Division ("CACN Broxtowe"), has provided the following information in accordance with the terms of the grant awarded by Cabinet in July 2024 and the Service Level Agreement for 2024/2027. Members may recall that Citizens Advice Central Nottinghamshire was formed in 2024 out of three previously existing Citizens Advice Bureaux, one of which was the former Citizens Advice Broxtowe. All figures in this report relate to Broxtowe only, with the funding provided by this Council being ring-fenced for the benefit of Broxtowe residents.

1. Summary

In the last 12 months (April 2024 to March 2025), CACN Broxtowe has helped 7,589 clients on a wide range of enquiries. CACN Broxtowe has provided a summary analysis of the 19,078 enquiries that were handled during the financial year of 2024/25. Most of these contacts related to benefits and housing matters (62%), with the remaining enquiries being classified as debt, utilities, employment, signposting, legal, relationships, financial, consumer, health, tax. CACN Broxtowe has also assisted clients in accessing £4.3m of additional benefits, which makes a huge difference to their wellbeing as well as supporting the local economy.
Housing enquiries have now overtaken debt as CACN Broxtowe's second largest enquiry area, with changes to legislation and landlords selling properties leading to an increase as well as other factors such as negative budgets making private rented property unaffordable (see campaign areas). Utilities has now overtaken relationship enquiries and is now CACN Broxtowe's fourth largest enquiry area. Debts worth £0.85 million have been written off for Broxtowe households.

Over the last three years CACN Broxtowe has worked hard to create new partnerships and the UKSPF project for financial resilience work as resulted in a new partnership with 'Futures' coming into our offices to aid residents to get economically active once CACN Broxtowe has removed the barriers to work.

2. Staffing

CACN Broxtowe currently employs 24 paid staff in Broxtowe (across the whole Central Nottinghamshire area, 51). In the first half of this year CACN Broxtowe recruited eight new volunteers to its establishment and is currently grateful to the support of 43 volunteers including 11 Trustees.

3. Volunteers

The volunteers give their time freely and all work from offices in Eastwood and Beeston and carry out a mixture of face to face, telephone and email enquiries. In addition, around 60% of volunteers move onto paid work, partly as a result of the skills and confidence gained as a volunteer. Many of its volunteers take up

paid roles within the organisation where appropriate as it is difficult to recruit staff already trained in the advice field.

Schedule A – Output Measures 2024/25

	Outcome Measure	Total
6.1	Number of new issues (problems) dealt with	19,078
6.2	Number of clients receiving support during the 12 months	7,589
6.3	Average amount of debt handled per client seeking debt advice	£11,381
6.4	Estimated amount of benefits gained for clients seeking benefit advice	£4,512,430
6.5	Please list the top five advice needs and the number of new social policy issues recorded for each: • Benefits • Housing • Debt • Utilities • Employment	 8,993 2,804 2.404 699 659
6.6	Number of staff employed as at 31 March 2025	24
6.7	Number of volunteers available as at 31 March 2025	43
6.8	Number of new volunteers recruited in 2024/25 (12 months)	8
6.9	Number of volunteer hours worked in 2024/25 (12 months)	11,388
6.10	Value of volunteer hours given 2024/25 (12 months)	£417,381
6.11	Please provide a summary analysis to indicate the extent to which the services of CAB have benefited clients.	See below

Research and Campaigns

Research and campaigns is one of the twin aims of our service – to improve the policies and practices that affect people's lives.

Our Research and Campaigns work is led by the experiences of our clients. We gather evidence through collecting and analysing client statistics and advice issue trends through our case recording system (Casebook). We also use evidence of client's stories recorded by our advisers and caseworkers on the Evidence Forms.

As a service, we have a huge amount of insight and data about the problems our clients and their wider communities face. Through research and campaigns, we use this insight to:

- help us research issues further
- campaign to get decision makers to change policies and practices
- influence decision makers to change policies and practices

Last year our research and campaigns work made a contribution to improving people's lives. Our team actively supported various National campaigns, including, Consumer awareness week, Big energy saving winter and Scam Awareness.

Using local data and evidence we researched issues relating to:

- Cost of Living Crisis: taking a local focus to a national campaign, looking at negative budgets in particular, more work on this over the next year.
- Private Rented Sector Housing issues: Looking at Local Housing Allowance, section 21 notices and disrepair - housing will also be a focus in 2025/26 due to the increased demand in this enquiry area.
- Digital Exclusion: In particular Blue Badge applications. We raised various Freedom of Information Requests with Nottinghamshire County Council and queried their processes of all applications being on line and the support service they offered for non-digital not being adequate.

After consideration Nottinghamshire County Council have opened a telephone line where residents can apply by phone as an alternative to digital means when applying for a Blue Badge.

We use a number of channels to get our messages to the public and compile reports using our own data, evidence collected from the public via a survey and external data to highlight the potential problems people may face.

Case Studies (Note – all names in the following case studies are fictitious)

Housing

James was living with his partner and three children, both in receipt of benefits. He was an official carer for his daughter and was in receipt of Carer's allowance and had a joint tenancy with Broxtowe Borough Council.

His relationship broke down as his partner had become abusive and controlling. James wished to leave the property however had no means financially (as the partner controlled all the money) or emotionally and required advice and assistance.

CACN Broxtowe advised James of housing options at Broxtowe Borough Council what they would offer at this point. Refuge/shared accommodation / temporary accommodation / supported accommodation.

We contacted Housing Options and were asked whether James wished to leave immediately or preferred a planned move. James opted for the planned move and a referral was made to supported housing by the Housing Officer.

James was referred to Equation by CACN Broxtowe. We helped him register on Homechoice and he was placed in Band 2. His case was delayed due to it involving Domestic Abuse with Deventio and Framework unable to openly speak with James as he was still living at the property. James was scared of his partner and it did take a while for him to leave.

James eventually moved into supported accommodation provided by Framework. CACN Broxtowe assisted James with UC/HB claims, assisted with change of address for his Carers Allowance and also bank details as all the money went into his ex-partners account. James was supported throughout his time in supported accommodation, logging in and bidding each week on properties on Homechoice until a property was secured.

James signed for a flat with Broxtowe Borough Council and CACN Broxtowe assisted with all the necessary changing of address, benefits, bank etc. He was referred to the Household Support Fund for financial support and white goods for the flat. James has settled well and is now in full time employment.
Regular reports are collated and sent to Broxtowe Borough Council to provide supporting evidence of the intensive and complex work our Specialist Housing Advisers provide to Broxtowe residents. We also meet on a regular basis to discuss our housing and mediation projects and to work in partnership.

Debt

Jess was referred to CACN Broxtowe by the Financial Inclusion worker at Broxtowe Borough Council after they had called her because she had received a liability order for Council Tax debt. Establishing that she had other debt issues they referred her over to our debt team for advice.

Jess is a 34 year old single parent of a 16 month old daughter in a two bed Broxtowe Borough Council property. Jess has never worked due to having bowel cancer when she was 18 years old. Her health in general is not good. She also has Fibromyalgia, PTSD, Bipolar, Chronic Anxiety and Depression, Autoimmune Disease and Foot Drop, she takes a number of prescribed medications to stabilise her situation. Jess is unlikely to work in the future, her income is solely made up of benefits so her situation is very difficult.

Due to the fact that the Financial Inclusion team and our Debt Team have a good working relationship and realising that her mental health situation was poor we decided to handle the initial referral delicately referring to each other in our conversations with her to build up her trust, so that she would know who would be contacting her and indeed she was expecting our call and knew the advisers name.

After the debt team's initial telephone conversation she agreed to come into the office for a face to face appointment, this went well and Jess said that she felt better and realised that we could help her situation

Initially everything went well, she provided all the information requested from her, however she then disengaged, she was not answering her phone or emails. We were not going to give up on her so easily this time, and those exact words were used in an email to Jess. We continued to email her using a friend-type approach rather than business-like to build up her confidence, this eventually worked and she started to engage again.

It was found that Jess had Priority Debt including a Magistrates Court Fine, Energy Debts and a small debt for Council Tax to Broxtowe Borough Council, she also had Non Priority Debts which included credit debts, water debts and a county court judgement and overdrafts. Jess had not been claiming Council Tax Support, she thought that it was automatically transferred from Erewash to Broxtowe.

Jess admitted her life was chaotic due to her mental health condition and was not coping with her debts, she was unable to get out of bed on some days and had to have help from her mother to look after her child. The constant letters and calls from her creditors was aggravating her situation and causing her to stress even more. She was not opening her mail. It was evident that if we help her manage her debts her mental health situation would improve.

Jess was an excellent applicant for a Debt Relief Order which would clear all of her debts other than the Magistrates Court Fine, after further investigation the Court fine only had two payments left so that too would be gone very soon.

Jess needed to provide us with identification, bank statements and creditors letters, which she presented in a carrier bag. The letters were opened together with the client during the appointment. Jess opened a new bank account which meant we were also able to get rid of her overdraft.

In November 2024 the client was granted a Debt Relief Order, she is now debt free and says that she feels that she can breathe again, she was very thankful for the caring service that she had received.

The client also agreed that we could refer her to Nottinghamshire Mind for help working with a recovery coach re mental health issues.

Benefits

Peter approached Citizens Advice for a benefit check following unemployment on capability grounds due to his ill health. His employer was set to end his contract with only one week's notice.

Our benefit check revealed some entitlement to council tax discount, as well as Personal Independence Payment (PIP). Peter had already phoned for the PIP forms but needed help to fill them in. We also gave him advice regarding his

rights with his employment. We found he was entitled to 2 weeks' notice pay rather than one, which his employer eventually relented and agreed to pay him after he spoke to them.

We helped him complete his PIP form, and during this appointment discussed his other issues or needs. We decided he would greatly benefit from a referral to the Priority Services Register as his medication for his health condition requires refrigeration, so he would be in urgent need for power in the event of a power cut. He also accepted a referral to the household support fund for a one-off payment of £140 to help cover expenses whilst he is waiting for benefit results.

We also helped him claim Universal Credit following a new benefits check after his wages had stopped, as we estimate an entitlement for at least £196.14/m provided client is found to have limited capability.

Overall we expect the client to receive £9334.80 in annual benefit gains, £140 from one-off grant payments, and we also helped him receive an additional £54.85 he was entitled to in dismissal from his employer.

Wellbeing Hub

Katie has been working with the Early Intervention Advisor since July 2023 for intensive support. The client was homeless and living in a 3 bed house with 9 people, so was triaged to our housing adviser.

After a lengthy appeal, she has now been placed in a 3 bed house with her 2 children. Katie was supporting her children on a standard Universal Credit claim of £393.45. We supported her with a claim for UC LCWRA, which she was awarded following a tribunal, amounting to £416.19 extra income. We completed a successful claim for Personal Independence Payment, awarding her a further £72.65 per week. Backdating for both benefits was £4,147.97.

Now that Katie has moved in, we have worked on getting her bills organised so that she can manage them independently (direct debits, Big Difference scheme, council tax support) which should save her up to another £1,000 annually. Client has received mental health support after a referral to Nottinghamshire Mind, and describes herself as in a much better place.

Mediation

Jemma had made a referral to the Mediation team, following a suggestion by a Broxtowe Borough Council housing staff member. Jemma and her neighbour Zoe were both aware that mediation had been suggested. Jemma and Zoe are next door neighbours and their homes are adjoining.

The Mediation team spent time with both parties explaining how the process worked and they both agreed to commit to the process and consider how they might move forward as neighbours. After a number of calls and an equal amount of time with each party they were both surprised by the information each was

able to share with the other. This seemed to give them both a greater understanding and empathy for the other.

We were able to draw up an agreement where each agreed to the requests of the other and they thanked each other for their honesty. Zoe offered to speak face to face with Jemma and Jemma considered this offer.

When we called them both six weeks later the agreement was holding and the women had spoken personally. Both felt they'd moved on, although Jemma suggested that Zoe's lifestyle was so different to hers she would never be a perfect neighbour but they had made some progress. Jemma felt she might now be able to approach Zoe if she had to raise any future concerns.

This agreement allowed Broxtowe's housing team to close the case involving these neighbours. With the option of reopening it should either neighbour raise concerns in the future.

Schedule B – Financial Monitoring Information

In accordance with the Service Level Agreement, Citizens Advice Central Nottinghamshire accounts ringfence their core funding to ensure it is used for the benefit of Broxtowe residents. CACN has provided the Council with financial monitoring information. The outturn for the year ended 31 March 2025 is as follows:

	Actual £	**Budget £**	**Variance £**
Income			
Grant (Broxtowe BC)	73,750	73,750	-
Other Income and Donations	75,882	16,000	59,882
Total Income	**149,632**	**89,750**	**59,882**
Expenditure			
Salaries etc.	103,382	101,029	2,353
Staff & Volunteer Costs	4,386	4,524	(138)
Office Costs	206	0	206
Premises	61	0	61
Other Overheads (Inc Cross Charges)	43,177	49,039	(5,862)
Total Expenditure	**151,212**	**154,592**	**(3,380)**
Income over Expenditure	**(1,580)**	**(64,842)**	**63,262**

The primary reason for the budget variation is a one-off donation from the 'Millionaire Postcode Lottery' due to a Broxtowe Street winning a large prize (£60,000).

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Cabinet **29 July 2025**

Report of the Chief Executive

Local Government Reorganisation

1. Purpose of Report

To update Councillors on the latest position regarding local government reorganisation in Nottinghamshire.

2. Recommendation

Cabinet is asked to NOTE the report.

3. Detail

On 19 March 2025 at the Broxtowe Borough Council Extraordinary Meeting on Local Government Reorganisation, the Council resolved that:

1. This Council notes the content and the intention to submit the interim plan for local government reorganisation in Nottingham and Nottinghamshire by 21 March 2025.

2. This Council cannot support a merger with a new Council which encompasses the current City Council boundary which is in a dire financial position and disadvantages Broxtowe residents and ignores their concerns and wishes, making it impossible to have the frank and open discussions essential to forming a successful long-term plan based on service delivery.

3. That Council considers the statement of risks and concerns set out in appendix 4 and agrees to note this to accompany submission of an interim plan on behalf of Broxtowe.

4. Any future reorganisation should be based on community needs and service delivery rather than plugging shortfalls in local government financing. Any process should empower local communities to share their voice and should not be confined to a narrow suite of options.

5. This Council calls upon the government to suspend the Local Government Review proposals in Nottingham and Nottinghamshire pending the financial stabilisation of Nottingham City Council which will allow for a full democratic consultation with the residents of Broxtowe to take place.

This Council rejected providing delegated authority to the Deputy Chief Executive and Section 151 Officer to set aside an earmarked reserve of £150,000 or more from an anticipated General Fund underspend in 2024/25 for the purposes of funding the cost of Local Government Reorganisation in the event of central government capacity funding being delayed and/or not sufficient.

A letter was sent to the Government conveying this resolution. Feedback from the Government on the interim plan was received which was reported to the previous Cabinet meeting and to full Council.

Further work done by PWC, on behalf of Nottingham and Nottinghamshire, in appraising the interim plan options is now able to be published and is attached in **Appendices 1** and **Appendix 2** to this report.

A meeting of Leaders was held in Newark on 11 July 2025 at which these appendices were discussed. There were varying opinions regarding the merits of option 1b (City/Broxtowe/Gedling) and option 1e (City/Broxtowe/Rushcliffe).

It is clear that option 2 (City on its existing boundaries and a new Unitary County for the rest of Nottinghamshire) is not a good match against the Government's criteria.

Further discussions are taking place regarding the practicality of progressing both options 1b and 1e to full business case.

Meanwhile both the City Council and Rushcliffe are progressing their own (different) models which they may or may not then pursue to full business case detail.

It is important that Broxtowe remains fully engaged in the process of local government reorganisation. Whilst its current position remains as outlined in the Council motion previously stated; it is important that Broxtowe is able to highlight to partners and the government some of the important implications of these choices for the future wellbeing of Broxtowe's residents, most particularly around:

- Future housing and employment land allocations and the risks to green belt in our area
- Managing homelessness if there is a wider City unitary
- Converging of Housing Revenue Accounts (HRA)
- Avoiding economic shocks for residents around council tax convergence; rent levels and council tax support
- Potential jeopardisation of new house building programmes and the building of a new leisure centre
- Safeguarding assets which generate income and community assets which contribute to community wellbeing (e.g. community and sports centres)
- Community support generally and the importance of arts culture and heritage which this Council has always worked to protect and enhance.

4. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

The Deputy Chief Executive and Section 151 Officer and the Assistant Director Finance Services continue to be engaged, through the Nottinghamshire Finance Officers Association (NFOA), in supporting with the financial aspects of the options appraisal process completed by the consultants PWC.

The assumptions made by PWC have been challenged and reasonable assurances have been provided as to transition costs and potential savings. Further detailed work will continue in developing the full business case of the preferred option(s) once these are confirmed.

5. Legal Implications

The comments from the Head of Legal Services were as follows:

At this stage there are no direct legal implications in relation to this report due to the developing nature of the reorganisation, these will not become clear until later on in the devolution process.

6. Climate Change Implications

The climate change implications are contained within the report.

7. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

8. Equality Impact Assessment

Not applicable.

9. Background Papers

Nil.

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Nottingham & Nottinghamshire Councils

Local Government Reorganisation

July 2025

Purpose

This document summarises the outputs of the options analysis stage developed during the period January - June 2025. It set out an overview of the evidence base used to inform the interim plan submitted to Government in March 2025 and further analysis undertaken in the following three months including that undertaken by officer groups from across all 9 councils.

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Appendix A: List of criteria deep-dives prepared to inform analysis 21

PwC supported the production of this report (which details the results of collaborative discussions between the councils) and:

- *Assisted with the options appraisal of the different formations of unitary council we have considered.*
- *Conducted financial analysis of those unitary options.*

For the avoidance of doubt, PwC's input was provided solely with our interests in mind, for our use only, and may not be relied upon by any other party.

1. Background and context

National Context

Devolution and reform

The English Devolution White Paper published in late 2024 by MHCLG outlined a distinct shift in the approach and ambition for reorganising and decentralising power to Local Government in England.[1] It set out as the default an enhanced Devolution Framework clarifying the powers available to each type of Authority and the aspiration regarding the types of powers and funding arrangements that will exist in future. This was a distinct shift from previous approaches, built around bespoke devolution 'deals'. This new approach intends to further empower local government and help to address existing financial sustainability and local service challenges by:

- Allowing for increased powers to be vested in local and regional government supported by integrated funding settlements;
- Structuring these new entities to cover larger geographies, but to retain logical boundaries which avoid 'islands' between reorganised areas, and which resonate with local identity; and,
- Implementing these radical changes at pace, accelerating delivery of benefits.

"A once in a generation opportunity"

Government has set out their ambition to make the most of a '*once in a generation*' opportunity to improve the way that local and regional government works in England. The aim is to create the conditions for economic growth, reduce duplication and fragmentation and create greater efficiencies in public spending and service delivery. Further detail of this policy intention is set out below.

Transform service delivery



LGR is seen as a catalyst for transformation, beginning with the establishment of new unitary councils. This scale of change is seen as a rare opportunity to redesign ways of working from the ground up, capitalise on new service synergies, and to deliver greater consistency across all services. It also allows for the opportunity to share the best of what is done currently, and to deploy it at scale to support broader public service reform.

Increased efficiency



There is duplication and fragmentation across local government as a result of the way the two-tier system has developed over a number of years. LGR creates an opportunity to address this by consolidating common functions, bringing together services that are currently split across more than one tier (e.g. waste), make better use of new and emerging technology and reduce the volume of systems or assets that are used currently.

Establish a stronger voice for the place:



There is an opportunity for a stronger, more unified voice for the area which supports its growing presence on the regional and national stage. The Government has already expressed its view about the importance of unitary local government as part of the devolution agenda, and to future models of system or integrated funding.

Enhance connections with communities



LGR presents an opportunity to create even better connections with local communities, better understand their sense of belonging, and to design models of service delivery that are effective. A number of the unitary councils established during previous rounds of LGR have adopted similar new arrangements, using the raised profile of democratic accountability to promote and enhance the connection with their communities.

Growth & prosperity



Continued accelerated growth which reaches all parts of the area requires a strategy that builds on regional priorities and opportunities. The conditions for future prosperity will be influenced by new infrastructure and investment which require a place-based approach across a wider geography. This is a key priority for regional and local government who will need to work together in different ways to achieve this.

1 MHCLG. English Devolution White Paper. December, 2024.

Local Context

Local government across Nottinghamshire has seen major changes over time. In 1992, unitary authorities were created, and by 1998, Nottingham City Council regained full responsibility for local services, while the county continued to operate a two-tier system with District councils.

Geography

Nottinghamshire is currently served by multiple tiers of local governance. Nottinghamshire County Council is a top tier county authority responsible for education, social care and highways, while seven district and borough councils provide services such as housing, waste collection and local planning. Nottingham City Council operates as a top tier unitary authority managing all local government functions within its boundaries. The county is represented by 11 parliamentary constituencies, many of which closely align with district and borough boundaries. Nottinghamshire shares a boundary with several neighbouring counties: Derbyshire to the west, South Yorkshire to the north, Lincolnshire to the east and Leicestershire to the south. The East Midlands Combined County Authority (EMCCA) covers the Nottinghamshire and Derbyshire areas and the cities of Nottingham and Derby.

Case for change in Nottingham and Nottinghamshire

Local government reform in Nottingham and Nottinghamshire presents an opportunity to address inefficiencies in the current two-tier system, which creates duplication, administrative complexity, and inconsistent service delivery.

Opportunities

Nottingham and Nottinghamshire have already embarked on a journey to devolution as part of EMCCA and LGR offers an opportunity to underpin this with a local structure that supports and complements the regional authority. A new unitary authority which encompasses an expanded city area would create space to grow, in turn providing opportunity to align urban planning and services. For example, with 6,565 additional homes required in Nottingham City over the forecast period 2022/27, reorganisation may enhance housing provision by balancing resources across a larger geographical area and tax base.

A simplified governance model would consolidate local service delivery under two new unitary authorities. This approach can enhance efficiency and consistency across a wider geography and community, ensuring seamless, equitable and cost-effective provision of key services. It also provides clarity for residents on where responsibilities for delivery of local services lies, and the respective layers of democratic representation.

Building on the Progress of EMCCA

1 Strengthening Regional Governance	LGR can help ensure that local councils work more efficiently with EMCCA, avoiding fragmented governance and complex decision-making processes.
2 Attracting More Investment	EMCCA can unlock significant funding and access to regional and national investment, while a streamlined local government structure simplifies bidding and fund management and delivery once funding is secured.
3 Supporting Economic Growth	Aligning LGR choices with the regional strategy and economic vision by simplifying the two-tier system decision-making and implementation.
4 Enhancing Democratic Accountability	LGR creates clearer governance, strengthening local authority ties with EMCCA and ensuring transparent, accountable decision-making for residents and businesses.

Rising financial and demand pressures on local councils also contribute to the urgent need for governance reform, with unitary authorities bringing together services with opportunities for future transformation, offering a pathway to improved stability, efficiency, and accountability.

Limitations

The current two-tier system can be confusing for residents and businesses regarding the responsibility for service provision (*see page 25*), and creates considerable customer demand in redirecting and supporting enquiries. Multiple district councils increases the challenge of coordination, and while collaboration across Nottingham and Nottinghamshire is generally productive and positive, delivering complex services such as housing, planning and economic growth is more challenging across multiple organisations. The recent reliance on bidding processes for central government funding places local areas in a competitive rather than collaborative space, resulting in potential gaps in service delivery, or in unequal provision of support across the area.

There are wider partnership challenges as the number of organisations that need to be involved in decision-making processes or operational delivery is significant. This is a system-wide issue and not just limited to local government arrangements.

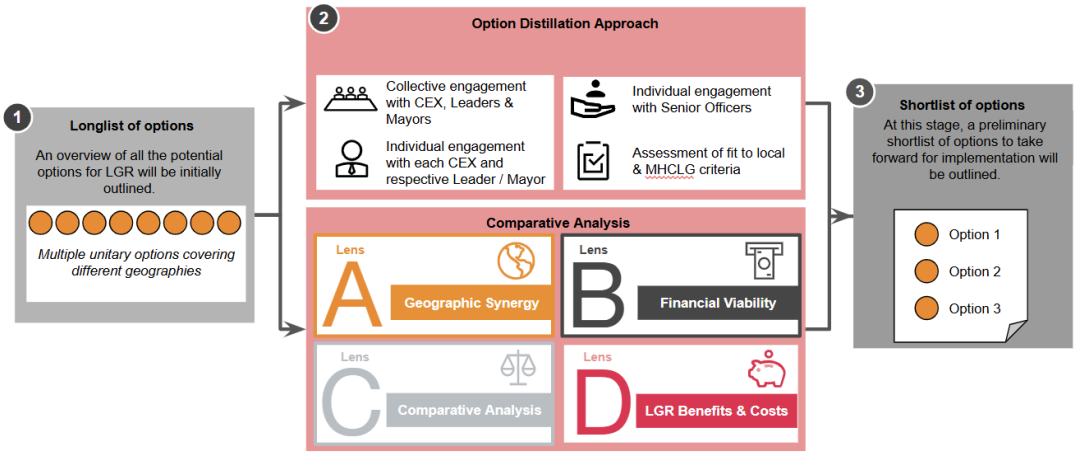
Escalating challenges in Financial Stability

Nottingham City Council
Nottingham City Council is under a Best Value Intervention Framework review due to financial challenges. To comply with the Best Value Duty, it developed a framework within its 'Together for Nottingham' plan, aimed at improving service delivery and meeting statutory obligations. Rising demand for key services, particularly adult social care, alongside economic pressures has intensified financial strain. In 2024/25, the council required **£41.0m** in Exceptional Financial Support to balance its budget. To address ongoing challenges, it proposed **£17.9m** in savings and income measures for 2025/26, focusing on financial stability while maintaining essential services.

Nottinghamshire County Council and District Councils
Projections indicate a budget shortfall of **£30.8m** from 2024/25 onwards, necessitating identification of significant savings in subsequent years up to 2026/27. To address financial challenges, the council has proposed various service efficiencies aimed at maintaining value for money while delivering its priorities.

2. Options Appraisal

To identify a preliminary shortlist of options to take forward to implementation, an initial long list of options were analysed using a comparative methodology.



Local criteria

In response to the English Devolution White Paper and in advance of the statutory invitation being received from MHCLG, local authorities across the area first agreed a four-point framework to test potential options.

How people live their lives

- Covers a credible geography – reflecting how places function economically and how people live their lives
- Reflects community identity and makes sense as a "Place" including spatial characteristics
- Enables sustainable operational delivery for public services
- Seeks to improve connectivity especially for communities that most need support

Financial and fiscal sustainability

- Financially sustainable local authorities, which are resilient to longer-term economic or policy changes by balancing income and need
- Delivers value for money through economy, efficiency and effectiveness
- Delivers financial benefits which outweigh the cost of change
- Risk informed with effective mitigation measures
- Considers Council Tax base and equalisation

Offers the potential for public service reform that improves outcomes and experiences for residents

- Enables solutions to challenges impacting on residents' outcomes and which risk long-term financial stability
- Provides safe and resilient support, help and protection and care to vulnerable children, families and adults
- Aligns with EMCCA to enable creation and delivery of services for Nottinghamshire and Derbyshire
- Considers alignment with all other key strategic partners
- Maximises opportunity to enhance delivery through innovation

Enables strong, local accountability and connection to communities and neighbourhoods

- Ensures services are easily accessible for all
- Strengthens the role of local democratic leadership
- Builds trust with local communities
- Seeks the active input and engagement of residents, businesses and employees

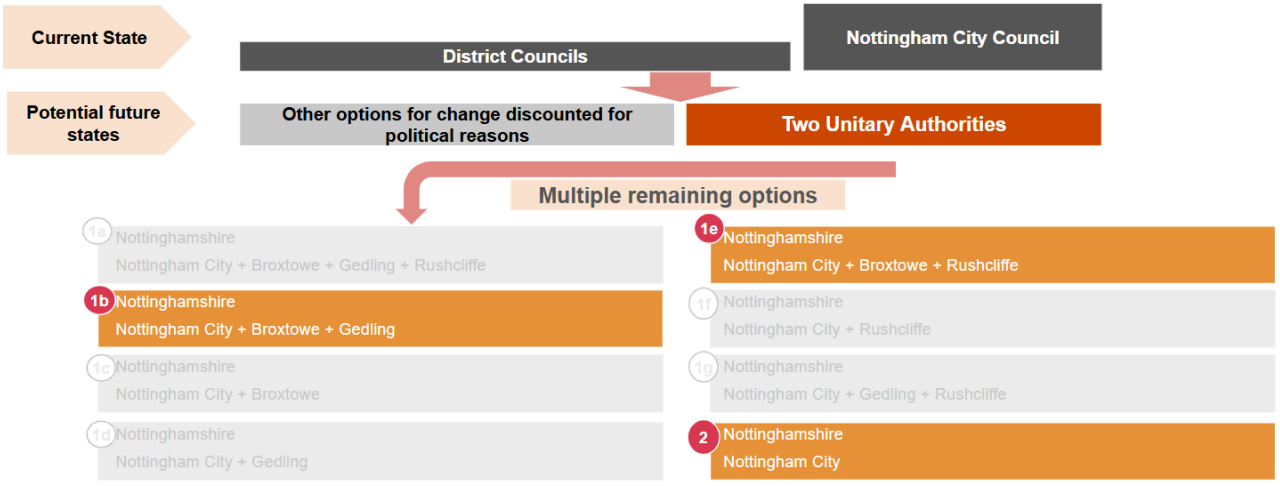
MHCLG criteria

MHCLG then officially set out their formal criteria in an open letter to the Leaders / Mayor of two-tier councils and unitary council in Nottinghamshire on 5th February 2025,[2] with supplementary guidance provided in June 2025 in response to the interim plan.[3]

Criteria 1	Criteria 2	Criteria 3	Criteria 4	Criteria 5	Criteria 6
Establishing a single tier of government for the whole area	**Improve efficiencies, capacity and withstand financial shocks**	**Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens**	**Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views**	**New unitary structures must support devolution arrangements**	**New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment**
Sensible economic areas, with an appropriate tax base. A sensible geography which will help to increase housing supply and meet local needs. Proposals need to be supported by robust evidence and analysis and include an explanation of the outcomes. There is a need to describe clearly the single tier local government structures it is putting forward for the whole of the area, and explain how, if implemented, these are expected to achieve the outcomes described.	New councils should aim for a population of 500,000 or more. There may be scenarios in which this does not make sense for an area, including on devolution. Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money. Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets.	Proposals should show how new structures will improve local government and service delivery, and should avoid unnecessary fragmentation of services. Opportunities to deliver public service reform should be identified, including where they will lead to better value for money. Consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety.	It is for councils to decide how best to engage locally in a meaningful and constructive way. Proposals should consider issues of local identity and cultural and historic importance. Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.	Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor. Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.	Proposals will need to explain plans to make sure that communities are engaged. Where there are already arrangements in place it should be explained how these will enable strong community engagement.

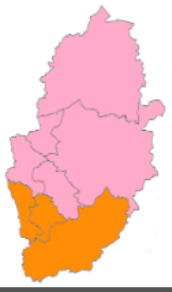
Longlist and shortlist of options

Eight options were identified in the long-list with a two Unitary Authority (UA) option (of some configuration) being the preferred option for the majority across the councils and against the MHCLG and agreed local criteria. Each option was assessed against the local and MHCLG criteria with further analysis and discussion undertaken to understand the implications of each. Through independent analysis, engagement with Chief Executives and Section 151 officers, the eight options were distilled down to three, which were subsequently discussed by all council Leaders / Mayor. It was agreed these options would be included in the interim plan submitted to Government.



2 MHCLG. Correspondence: Nottinghamshire and Nottingham. February, 2025.

3 MHCLG. Local government reorganisation: summary of feedback on interim plans. June, 2025.

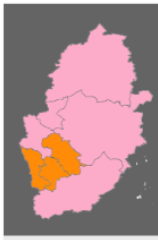
1b Nottinghamshire and Nottingham City + Broxtowe + Gedling	1e Nottinghamshire and Nottingham City + Broxtowe + Rushcliffe	2 Nottinghamshire and Nottingham City
		
1. Nottingham City conurbation to include **Broxtowe and Gedling** 2. The **rest of Nottinghamshire** becomes a new unitary authority	1. Nottingham City conurbation to include **Broxtowe and Rushcliffe** 2. The **rest of Nottinghamshire** becomes a new unitary authority	1. **Nottingham City remains the same** 2. The **rest of the Nottinghamshire** becomes a new unitary authority

Further detailed analysis of shortlisted options

Given the rapid timeframes required for the interim plan, it was agreed in May 2025 that the identified options should be further appraised against the Government's framework. The intention was to develop a more comprehensive set of information in order that a decision on which option(s) to take forward to develop into a full business case for LGR can be made. The additional analysis focussed primarily on three areas which are set out below. There was also further discussion with the sect. 151 officers of all councils on the financial modelling.

Topic	Analysis	MHCLG criteria
Sensible economic area	implications for achieving government ambitions around growth	Criteria 1(a): Sensible economic area
Sensible geography	implications for achieving government ambitions around housing supply	Criteria 1(b): Sensible geography
Impact on crucial services	Adult and Children's Social Care, Children's SEND, Homelessness and Public safety	Criteria 3: Impacts for crucial services

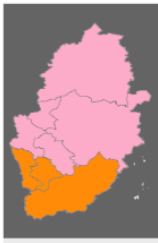
Each of the three options offers different strengths and challenges, though Options 1(b) and 1(e) were found to provide the strongest alignment to MHCLG criteria. The additional analysis re-affirmed that Option 2 is the least sustainable option and concluded that the differences between Options 1(b) and 1(e) within each criteria are marginal.



1(b)
Nottinghamshire and Nottingham City + Broxtowe + Gedling

This option demonstrates a somewhat stronger fit against the MHCLG criteria compared to other options. Whilst constraints such as urban capacity and Green Belt review may impact future housing delivery, it combines authorities that are already the most alike in terms of rural / urban settings and aligns with the City's demography and geography, potentially creating a more even requirement for service delivery and equal population / debt-to-reserve ratio based on analysis.

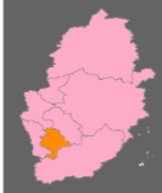
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1(e)
Nottinghamshire and Nottingham City + Broxtowe + Rushcliffe

This option demonstrates a strong fit against the MHCLG criteria. It is a marginally stronger fit on travel to work and housing market areas, has a balanced population split, similar deprivation levels, (to 1b) and is comparable in terms of the financial analysis completed to date. The city-based conurbation authority would become predominantly rural with the more diverse Mosaic characteristics, potentially leading to a requirement of different services models across the place.

01 02 03 04 05 06



2
Nottinghamshire and Nottingham City

This option demonstrates the weakest alignment against the MHCLG criteria of the three options under further consideration. It would provides the greatest degree of fragmentation of travel to work, hospital and housing market areas, a significant population and debt-to-reserve imbalance which is the highest amongst all options, significant challenges in coordinating and financing services, and may leave communities that identify with the city in a different geography.

01 02 03 04 05 06

The full Options Appraisal is a separate document which sets out how each of the three options aligns to the MHCLG criteria, including updated financial modelling to reflect a review of the assumptions which has been discussed with s151 officers.

Overview of Options 1b and 1e

Option 1b

This option creates two new unitary councils and aligns to the criteria associated with identifying sensible geographies in that it would see the establishment of one authority serving a primarily urban area and another service primarily towns and rural areas. It also aligns to the requirement to consider how housing supply would be increased in that it provides room for the conurbation to grow.

It would not unduly create an advantage or disadvantage for one or other as part of the wider area and is comparable in terms of the financial analysis completed to date to option 1e. It would meet the requirement to establish new unitaries serving 500,000 people or more and would deliver efficiencies and manage transition costs. It would also appear to satisfy the criteria relating to areas which include a council in Best Value intervention.

To some extent it would avoid the unnecessary fragmentation of key service areas and would ensure consideration is given to the "crucial services" as set out in the MHCLG framework. Including a greater proportion of rural areas with the city conurbation would require services to provide more tailored approaches and different models of community support. Consideration needs to be given to the benefit of creating two new unitary organisations where population densities and needs are more aligned rather than dispersing this further as would be the case in option 1e.

Finally, it would establish a reasonable basis to support current and future devolution arrangements.

Option 1e

This option would also create two new unitary authorities albeit they would blend some urban and rural areas. It would find it somewhat harder to satisfy the Government's criteria relating to sensible geographies for that reason. It would align to the criteria in terms of population, delivering efficiencies, providing the means to manage transition costs. It would appear to satisfy the requirements relating to areas which include a council in Best Value intervention. It is comparable in terms of the financial analysis completed to date to option 1b in that the costs and benefits are largely the same.

There are significant sources of future housing supply in the combination of Nottingham, Rushcliffe and Broxtowe to meet the new local housing need estimates and help offset the historic under delivery of housing in some areas which would likely be required by the strategic authority. Delivery of future growth and housing of the wider urban area / 'expanded city' would be controlled by one of the new authorities. However, this option excludes Gedling which is integral to the functioning geography of the Nottingham conurbation and would mean housing and growth decisions required to support economic needs of the conurbation would be made by the more predominantly rural new authority.

To some extent it would avoid the unnecessary fragmentation of key service areas and would ensure consideration is given to the "crucial services" named in the MHCLG framework. Some consideration would need to be given to development of service models that are able to function across two authorities that have a blend of rural and urban areas, one of which would include Nottingham city. Finally, it would establish a reasonable basis to support current and future devolution arrangements.

Further detailed analysis of Options 1(b) and 1(e)

In summary, both options meet MHCLG criteria 2, 5 and 6 based on the analysis.

Option 1b is marginally stronger against criteria 3 and 4.

Option 1e is marginally stronger against criteria 1.

The summary of this analysis is outlined below:

Criteria		Option 1(b)	Option 1(e)
Criteria 1	**Strengths**	• Creates a sensible economic area, providing: ○ (i) alignment with HMAs (70.41% of population within the existing Inner Nottingham HMA residing in the city-based authority and 15.33% in the county-based authority) ○ (ii) alignment with TTWAs (65.21% of Nottingham TTWA residing in the city-based authority and 20.46% in the county-based authority)[4] ○ (iii) some fragmentation with Hospital Trust boundaries. ○ (iv) medium levels of economic self-containment (71% for the city-based and 60% for the county-based authority) ○ Creates a sensible geography which would help increase housing supply and	• Creates a sensible economic area that aligns slightly more in terms of Government criteria than 1(b) providing: ○ (i) alignment with HMAs (70.89% of pop. in the existing Inner Nottingham HMA resides in city-based authority and 14.85% in the county-based authority)[4] ○ (ii) stronger alignment with TTWAs that option 1b (66.7% of Nottingham TTWA residing in the city-based authority and 18.98% in the county-based authority) ○ (iii) least fragmentation to Hospital Trust boundaries ○ (iv) medium levels of economic self-containment (71.1% for city-based authority and 60% for county-based authority), • Creates a sensible geography which would help increase housing supply and meet local needs, evidenced through:

		meet local needs, evidenced through: ○ (i) the smallest difference in new housing needed and planned over next 15 years ○ (ii) Potential for additional housing development in Nottingham on brownfield land negating reliance on greenfield and large geography available for county-based authority ● Relatively equal deprivation levels (city-based authority at 26.5 and county-based authority at 20.7) ● More balanced in terms of how rural and urban areas come together in the new authorities	○ (i) Joint working on housing needs as part of the Greater Nottingham Strategic Plan ○ (ii) grouping of the three authorities with major proposals for the Nottingham area "Trent Arc" together ○ (iii) potential to release land in the Green Belt area as Grey Belt to enable higher levels of affordable housing and wide geography in county authority. ○ Relatively equal deprivation levels (city-based authority at 24.7 and county-based at 22.3) ● Less balanced in terms of how rural and urban areas come together in the new authorities
	Challenges	● In TTWA terms it is not an optimum fit with the sensible economic area criteria overall, as it significantly fragments the Nottingham TTWA for Rushcliffe residents (-3.50), leaving more residents working outside their resident authority than within ● Constraints such as urban capacity, Green Belt review and splitting of current strategic growth areas across the built-up area of Nottingham between two authorities may dominate and impact accelerated housing delivery and future growth options beyond current plan allocations, requiring higher levels of coordination and agreement which may hinder long-term housing supply in a way which would not in Option 1(e) ● There is a larger deprivation gap between the two new authorities in Option 1b compared to the configuration of Option 1(e)	● In TTWA terms it is not an optimum fit with the sensible economic area criteria overall, as it significantly fragments the Nottingham TTWA for Gedling residents (-15.1), leaving more residents working outside their resident authority than within ● Has the greatest difference in terms of new housing needed and planned over the next 15 years, with the county-based authority having a shortfall of 6,500 and each authority at different stages in their Local Plan making cycle, whilst the city authority has a surplus of 8,700 ● Gedling is integral to the functioning geography of the Nottingham conurbation hence its exclusion presents a limitation as it would mean housing and growth decisions would be determined by a different local authority
	Considerations	● Prioritise brownfield development to reduce reliance on using greenfield land for housing ● Conduct an early review of Green Belt boundaries in Broxtowe and Gedling to identify potential Grey Belt areas that could be developed	● Conduct an early review of Green Belt boundaries to identify potential Grey Belt areas that could be developed into housing ● Establish an inter-authority working group to align housing and growth decisions in the wider Nottingham conurbation (especially Gedling,

		into housing and estimate volume ● Use EMCCA Inclusive Growth Commission to manage cross-authority planning issues related to strategic growth locations now split across authorities, and drive shared transport and housing interests across divided TTWAs and HMAs.	which is integral to the functioning geography of Nottingham) ● Utilise existing GNSP planning frameworks and evidence bases as the foundation for new Local Plans, and align timelines for new plans ● Continued monitoring of TTWAs and HMAs data to detect further fragmentation early
Criteria 2	**Strengths**	● Relatively equal population level with Nottingham City conurbation authority projected to have 603,185 residents by 2035 and the Nottinghamshire authority projected to have 661,460, meeting the 500,000 population criteria. ● Financial resilience criteria based on analysis to date likely to be met with Nottingham City conurbation authority debt-to-reserve rating improving to 53.5, with the Nottinghamshire authority standing at 14.0	● Relatively equal population level with Nottingham City authority projected to have 611,518 residents by 2035 and the Nottinghamshire authority projected to have 653,127. Option 1(e) meets the 500k population criteria. ● Financial resilience criteria based on analysis to date are likely to be met with Nottingham City authority debt-to-reserve rating improving to 47.4, with Nottinghamshire authority standing at 14.7.
	Challenges	● Both options meet the MHCLG criteria based on the analysis to date. However, there will be a need to - in developing a full business case for submission to Government in November - develop a more detailed financial case and look at a range of additional data e.g. capital, assets, debts and liabilities. Based on the financial analysis to date, there are no substantial differences between the two options.	
	Considerations	● As part of developing a full business case, consideration will need to be given to what service delivery models the two new authorities will put into place recognising growing levels of demand and costs. ● Disaggregation of services will have a cost impact in both options so mitigations will need to be considered. ● Option 1e combines more rural areas with urban areas so may have an impact on models of service delivery and therefore resourcing costs.	
Criteria 3	**Strengths**	● Authorities providing Adult Social Care services to areas with greater commonality of needs (i.e. urban in the city-authority and towns/villages in the county), help to drive strategic and operational advantages not able to be realised in Option 1(e), e.g. providing ASC city services is most straightforward given infrastructure, town centre, travel and crossover to facilities ● Based on ASC need and income (estimation of self-funders and contributors),	● Demonstrates a relatively balanced distribution of ASC services, with the projected social care-to-council tax spending rating being 0.87 for the city authority and 0.92 for the county-authority, which is on par to Option 1(b) (0.94 and 0.87) ● The mix of urban, suburban and rural dynamics may foster new innovative approaches to public safety, leveraging diverse community resources to address shared challenges. ● Public safety strategies that address a continuum of crime

		Option 1(b) is also more balanced for self-funders. ● Children's SEND demand and service delivery is more equally balanced under Option 1(b), and does not pose a significant challenge to resources, caseloads and workload ● Less impact on delivery than Option 1(e) as demand for SEND in Broxtowe and Gedling in average band ● This is reflected for Children's Social Care services, with Option 1(b) providing the most equal balance of expenditure (51% and 49% for the county and city authorities respectively) ● Urban crime and public safety issues spanning the city and its densely populated suburban areas are more effectively addressed through Option 1(b), through better coordination of homelessness, domestic abuse and substance abuse services; targeting where demand is the highest. ● For example, a city and county authority may have more capacity to invest in specialised programmes that address both complex urban challenges that have cross-county implications, and specific rural crime patterns from urban to rural areas could be addressed by the city authority. The addition of Rushcliffe may enhance the tax base, potentially providing more financial capacity for public safety initiatives, but it could also affect per capita funding distribution. ● The geographical split between north and south county simplifies oversight for county-wide services, enhancing operational efficiency for services like emergency planning. It would allow Ashfield, Mansfield, Bassetlaw, Newark and Gedling to focus on common public safety issues related to industrial histories and market towns. ● Homelessness services could be further streamlined as many Rushcliffe rough sleepers have a local connection to Nottingham City, which would provide an easier customer experience if Rushcliffe was to align with the City. ● For Children's Social Care services, Option 1(e) offers a fairer share of the tax base across the two new unitary authorities.
	Challenges	● Additional strain on existing public safety services and infrastructure, with the distinct challenges of suburban areas (e.g. property crime, youth anti-social behaviours) being potentially overshadowed by more intense city/urban issues [12] ● Risk of disaggregation and quality of ASC services is significant but no greater risk than Option 1(e).	● Balancing the high-demand, public safety needs of Nottingham City and Broxtowe with the different priorities of the less deprived and safer areas of Rushcliffe, leading to a perceived, or actual dilution of dedicated public safety provision ● Potential loss of revenue to fund statutory SEND services in the new authority (mainly from Rushcliffe), which has lower rates of children with Education, Health and Care (EHC) plans. ● Significant impact to Children's Social Care Services, with income being reduced for the county authority; the percentage point gap of 6% between the share of children's total expenditure is 3 times that of Option 1(b). ● Risk of disaggregation and quality of ASC services is significant but

			no greater risk than Option 1(e), though Rushcliffe demographics differ to the city and are more similar to Bassetlaw and Newark in that there is overall an older adult population
	Considerations	● Agree transition principles to enable continuity of care should services be transferred to another authority and/or service levels change ● Harmonise provider contracts across the county-based authority - as far as is possible - to minimise cost inequalities, with potential transitional funding to alleviate cost shocks ● Establish joint service commissioning or shared delivery models across the two authorities for small, high-demand specialist ASC services (e.g. Safeguarding) and SEND services to ensure balanced benefit and equitable access, with potential co-production and delivery of the Local Offer across both authorities ● Implement a single homeless pathway and joint protocols across the two authorities, and agree that the city-based authority leads coordination with the NHS Hospital Trust Area in the South for homelessness challenges on behalf of both authorities (i.e. for Nottingham, Gedling, Broxtowe and Rushcliffe) ● Create a rural-focussed public safety framework tailored to specific needs such as agricultural theft, flooding and access to services, underpinned by a service delivery model that reflects the demographic and safety needs of each authority area and preserves localised intelligence and response capabilities ● Phased transition to systems (Mosaic, CCTV), with dedicated training for both legacy and target systems and allocated funding for digital harmonisation	
Criteria 4	**Strengths**	● When assessing the types of areas that exist across the Nottingham and Nottinghamshire geography, combines authorities that are the most alike in terms of rural/urban settings of the two options (i.e. Urban Minor Conurbation and Rural Town/Fringe). ● Has the most similar clustering of demographics across the two options when assessing mosaic characteristics. For the Nottingham City conurbation authority, these are mainly Aspiring Homemakers, Senior Security, Rental Hubs, Family Basics, Transient Renters and Domestic Success (non-exhaustive). ● Given the similar grouping of rural and urban populations, this suggests that each authority could best tailor its services to the specific needs of its demographic	● Has some similar Mosaic demographics groupings when comparing the city-based authority in Option 1(b), including Rental Hubs, Domestic Success, Family Basic, Senior Security, and Aspiring Homemakers (non-exhaustive) ● Incorporates a diverse range of communities (urban and semi-rural/rural), fostering a diverse identity with more flexible delivery models

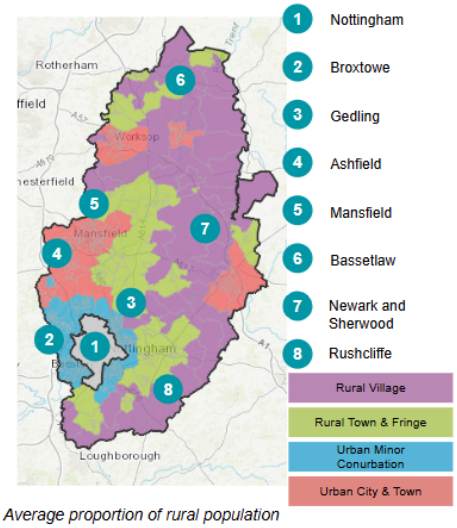
	Challenges	● For a variety of reasons to it is key to consider the implications of having a wider variance of authorities in terms of rural/ urban settings, introducing contrasting service needs, cost profiles and expectations ● Option 1e would merge areas such as Nottingham and Rushcliffe and as a result become predominantly rural, whilst the county-based authority would also remain predominantly rural ● Best exemplified through mosaic characteristics being introduced for the city-based authority in Option 1(e) (when adding in Rushcliffe demographics) that are not evident in Option 1(b), such as Prestige Positions and Country Living	
	Considerations	● In both options there would be a need to consider new models of service delivery. In option 1e there is a need to consider the potential additional cost and complexity of delivery services across very different local areas. ● Consideration could be given to establishing sub-locality planning zones within the city-based authority to preserve place-based service design, local identity and cultural/ historic importance (i.e. inner urban, suburban fringe and rural villages) ● Consideration could be given to how functions would need to be established to respond to contrasting community needs	
Criteria 5	**Strengths**	● This option supports effective governance arrangements with the two new Unitary Authorities and the EMCCA as the reorganisation reduces complexity and bureaucracy by limiting the number of governance structures and elected representatives for the region, allowing efforts to be focussed on driving more investment and economic growth ● EMCCA is expected to have a population of ~2.38 million by 2035. The two new authorities will make up just over half of this population, with the Nottingham City conurbation authority projected to have 603,185 residents by 2035 and the Nottinghamshire authority projected to have 661,460. This represents a relatively sensible population size ratio between authorities and EMCCA	● As with Option 1(b), this option supports effective governance arrangements with the two new Unitary Authorities and the EMCCA, and will make up just over half of the expected EMCCA population of ~2.38 million by 2035., with the Nottingham City conurbation authority projected to have 611,518 residents by 2035 and the Nottinghamshire authority projected to have 653,127. This represents a sensible population size ratio between the authorities and EMCCA, and is the most sensible of the two options
	Challenges	Consideration will need to be given to the difference between Option 1b and Option 1e in terms of providing Nottingham City a large enough conurbation - of the appropriate rural / urban mix in which to generate growth and also operate as a Core City	
	Considerations	● Define the respective roles of EMCCA and Unitary Authorities to help unlock devolution opportunities (e.g. e.g. EMCCA responsible for strategic oversight and funding and Authorities responsible for placed-based delivery and community engagement) ● Work closely with EMCCA and wider system partners to agree the scope and relative responsibilities of the strategic authority and delivery. This will immediately concern areas such as transport, skills, economic	

		growth, housing and planning where EMCCA will have strategic oversight and the new unitary authorities - along with those in the Derbyshire footprint - will be accountable for operational delivery	
Criteria 6	**Strengths**	• Community engagement and neighbourhood empowerment is likely to be supported by this option as there is some overlap with existing wider system provision and several cross-boundary community networks already operate across this geography, offering a foundation for continuity and low-friction integration for the UA. • Gedling, Broxtowe and Nottingham residents also share similar urban characteristics, challenges, and infrastructure needs — enabling more targeted and aligned engagement approaches and genuine opportunity for neighbourhood empowerment	• As with Option 1(b), there is some overlap with existing wider system provision and several cross-boundary community networks already operating across this geography • Rushcliffe, Broxtowe and Nottingham have already collaborated on shared strategic planning priorities through the Greater Nottingham Strategic Plan - indicating an established approach to strong community engagement. • Both Broxtowe and Rushcliffe also have strong transport and economic links to Nottingham, only further supporting stronger communities
	Challenges	• While building on existing provision, the existing engagement channels may not be sufficient for the demands of a new unitary structure, as there may be gaps in reaching less engaged, underrepresented, or emerging communities	• The rural mix of rural and urban populations within the city-based authority will present unique needs and therefore potentially new and bespoke channels will be required. • Rushcliffe's affluent rural/suburban demographics may feel disconnected from Nottingham's urban-focused narrative, leading to perceived urban bias or underrepresentation • The divergent identities and community priorities across urban Nottingham and rural Rushcliffe could result in less effective messaging and engagement, lower participation, and challenges in building a unified local identity
	Considerations	• As part of developing a full business case for change, there will be a need to ensure there are mechanisms in place for local community engagement • In terms of empowering communities to be part of identifying appropriate solutions for their localities, a strengths based approach, identifying where existing community structures are strong and where new challenges (e.g. digital, faith-based, rural connectors) need to be developed could be taken. This could include implementation of tailored area-based engagement strategies	

Rural-Urban comparative analysis of 11 core cities in the UK

At the meeting of Chief Executives on 06 June, it was agreed that further consideration should be given to the extent of the different types of geography covered by the two options, as a contributing factor to MHCLG Criteria 1(b): Sensible geography.

The table below shows the percentage distribution between rural and urban areas within the UK's eleven core cities. Option 1(b) most closely aligns with the average UK city demography offering an urban density of 96.1% against the UK average of 98.41%, which is greater than the urban density offered in Option 1(e) of 87.6%. If Option 1(e) was progressed, the Nottingham City authority would have the lowest urban density of the 11 core cities within the UK.[4]



Average proportion of rural population
Department for Rural Affairs - Rural Urban Classification Map - Nottingham Observatory

11 core cities	Rural %	Urban %
Bristol	0%	100%
Liverpool	0%	100%
Manchester	0%	100%
Nottingham (currently)	0%	100%
Birmingham	0.10%	99.90%
Glasgow [1]	0.40%	99.60%
Belfast [2]	0.43%	99.57%
Newcastle	2%	98%
Cardiff [3]	3%	97%
Sheffield	4.10%	95.90%
Leeds	7.50%	92.50%

The primary focus is a comparison of the percentage of rural and urban areas within each city, highlighting the predominance of urban regions. A key observation is that Option 1(b) is more aligned with demographic characteristics of a typical UK city, with an urban density of 96.1%, whilst Option (1e) would have the lost urban density of all UK cities at 87.6%.

Option	Rural %	Urban %	Difference between %'s
Option 1(b)			
Nottingham City + Broxtowe + Gedling (future Nottingham City)	3.9%	96.1%	34.4%
Nottinghamshire + Remaining LAs	38.3%	61.7%	
Option 1(e)			
Nottingham City + Broxtowe + Rushcliffe (future Nottingham city	12.4%	87.6%	18.3%
Nottinghamshire + Remaining LAs	30.7%	69.3%	

Note: The urban domain is defined as comprising physical settlements with a usually resident population of 10,000 people or more, all other areas being considered rural.[5]

4 Department for Environment, Food & Rural Affairs. *2011 Rural Urban Classification lookup tables for all geographies.* October, 2023.

5 Department for Environment, Food & Rural Affairs. *2011 Rural-Urban Classification of Local Authority Districts and Similar Geographic Units in England*. April, 2016.

Why Option 2 has been deprioritised

Based on the analysis, Option 2 demonstrates the weakest alignment against the MHCLG criteria, and it was agreed that this option should be de-prioritised. Overall, Option 2 would provide the greatest degree of fragmentation of travel to work, hospital and housing market areas, a significant population and debt-to-reserve imbalance (between the two new authorities) which is the highest amongst all three options, significant challenges in coordinating and financing services, and may leave communities that identify with the city in a different geography. An assessment of Option 2 against the MHCLG criteria is summarised below:

Criteria	Advantages and Disadvantages
Criteria 1	This option presents the least alignment with the Sensible Economic Area criteria of all three options, providing the lowest degree of economic self-containment, and the greatest fragmentation of travel to work and NHS Hospital Trust areas, and the Inner Nottingham housing market area. Similarly, it presents the weakest alignment with the Sensible Geography criteria, as the ability to increase housing supply is limited by restrictions on available land for housing in Nottingham City. Whilst present supply figures look strong, housing supply may not be able to be increased in the long-term due to reduction in sources of supply over time (e.g. absence of Green / Grey Belt land). Nottinghamshire + Remaining LAs have a significant shortfall and require the highest number of houses to be identified across a large authority; a challenge not faced by the other options. The contrast in deprivation levels are the highest amongst all options, with Nottingham City's average deprivation score at 34.9, significantly higher than Nottinghamshire's 19.
Criteria 2	This has the weakest alignment with criteria 2, as it presents a significant population imbalance and the highest difference amongst all options, with Nottingham City projected to have 352,463 residents by 2035, fewer than Nottinghamshire's 912,182. Additionally, financial resilience - key to the criteria 2 - is a concern, as Nottingham City's debt-to-reserves ratio stands at 83.9, exceeding Nottinghamshire's 16.5. This increases the potential for financial vulnerability when compared to other option 1(b) and option 1(e), and has the highest difference amongst all options.
Criteria 3	Option 2 is partly aligned with criteria 3, as the unitary councils would have potential viability issues and service imbalances. There is a high social care cost imbalance in this option as the projected social care-to-council tax spending ratio is 1.12 for Nottingham City and 0.8 for Nottinghamshire. This would cause financial strain due to high care demands paired with a limited tax base.While this option presents a greater GP availability it is not enough to outweigh its structural weakness.
Criteria 4	Option 2 is partly aligned with criteria 4. Looking at the types of areas that exist across the Nottingham and Nottinghamshire geography, Option 1(b) combines authorities that are already the most alike in terms of rural / urban settings of all three options. Arguably, Option 2 would be less likely to satisfy the requirement as it may leave communities that do identify with the city in a different geography.
Criteria 5	This option presents the weakest alignment with criteria 5. Whilst there is already an existing combined authority (EMCCA), it does not meet the requirements for a sensible population size ratio, with Nottingham City projected to have 352,463 residents by 2035 and Nottinghamshire to have 912,182. This would not meet the threshold for a population of 500,000 or more.
Criteria 6	Community engagement and neighbourhood empowerment will need to be supported. Consolidating most rural communities into one new authority allows for a concentrated focus on specific community issues like rural crime, flooding, and access to support services, though the sheer size of the rural/mixed urban-rural unitary could make it challenging to maintain the depth of local engagement and partnership.

Approach

In Phase 1 an initial evidence based options analysis was completed for local government reform. The financial model formed a part of the quantitative analysis to investigate the costs and benefits for a wide range of options all of which were based on current district and unitary authority Boundaries.

The s151 Officers met on 15 May to review the financial model and assumptions being applied. During that session there were some further clarifications sought. It was agreed that the analysis undertaken at this stage was sufficient to enable the s151 Officers to provide assurance to their Councils. This position was further confirmed at the Finance Officers meeting on 23 May.

The financial analysis, methodology and assumptions applied have been shared, tested and talked through with s151 officers. All councils have accepted the financial analysis as complete with each s151 officer providing assurance on the model and underlying assumptions. This analysis is to support the options analysis stage only. Significantly more work will be needed for a financial case that supports a full proposal.

In addition the County Council has undertaken some analysis on the potential impact on Options 1b &1e of social care self funders in the event that leads to an important difference in the cases. It has been concluded that this does not.

Methodology

The financial analysis model relies on a number of assumptions, primarily based on publicly available revenue outturn data and by applying assumptions which have been demonstrated across previous LGR proposals. This logic and assumptions applied have been tested with the s152 Officer group.

It looks at revenue only data and there are some considerations for the full financial case that have not been included at this stage including potential impact of the Fair Funding Review 2.0 which is currently in live consultation.

Analysis

The financial model incorporates key structural and management costs, including redundancy estimates, senior leadership changes and estimated savings across cost categories. The updated financial analysis evaluated Option 1(b) & (e) and Option 2. A single unitary authority has been included for comparative purposes only. It takes into account estimated transition costs, annual benefits, net benefits over a five-year-period and payback period. Option 1(b) & (e) incurs an estimated transition cost of £28.8m, providing circa £24.6m of annual benefits and circa net benefit of £64.7m after five years, with a payback period of 1.3 years. Option 2 on the other hand estimates transition costs of £21.3m (there are anticipated lower levels of change e.g. less disaggregation) and estimated annual benefits similar in scale to Option 1(b) & (e).

	Transition costs (£)	Annual benefits (£)	Net benefit after five years (£ total)	Payback period (years)
Option 1: 1(b) & 1(e)	£28,848,294	£24,620,878	£64,711,043	1.3
Option 2: Nottinghamshire & Nottingham City	£21,250,744	£24,620,878	£72,308,593	Less than 1 year
Comparative purposes only **Option 3:** Single Unitary Authority	£19,249,433	£30,044,575	£94,919,953	Less than 1 year

4. Next steps

Indicative timeline to implementation

A significant range of activities will need to be completed prior to final submission of the proposal in November 2025. This includes stakeholder engagement, legal, financial and organisational development activity, which will likely require some specialist support. The immediate next step is for Chief Executives and Members to make a decision on which option(s) to take forward to develop into a full business case in July 2025.



Requirements for the full proposal and financial case

Set out below are the activities required once a decision is made on which option(s) to take forward to develop into the full business case. These will need to be commenced as soon as possible in order to undertake a reasonable level of analysis and to meet the November 2025 deadline.

Refining the options appraisal

- Since submission in March, the Options Analysis has been narrowed down to three options: Option 1(b), Option 1(e) and Option 2.
- Deep dives have been conducted against MHCLG criterion such as sensible economic area, sensible geography and crucial services.
- The financial analysis has been updated.

2 Developing the full proposal

- The stated intention is to develop a single proposal, working collaboratively. The points set out below would need to be developed in any full business case proposal.
- A vision for the new council(s), including the improved outcomes expected to be delivered for people and the place.
- Design of a high level target operating model for the new council(s); including customer offer, ways of working, culture and values, how technology and information will be utilised etc. and describing what residents will experience.
- Identifying opportunities for service synergies - consolidation of existing functions, simplification of processes and opportunities arising from bringing district and county together (e.g. housing and social care), as well as district and existing unitary functions together.
- Designing the arrangements that will be put in place at a locality level to build engagement and ensure the new councils are responsive locally.
- Clarify the democratic structures that will be put in place - e.g. structures and numbers of councillors, key milestones and decision points.
- Determining how the new council(s) will work with EMCCA
- Describing how the the new councils will work towards more ambitious public service reform, working with other providers in the geography.
- Determining how any new council(s) will work together to share certain functions.
- Developing an implementation roadmap, which will identify the target and interim states for the new council(s).

3 Developing the financial case

- Identifying the costs and benefits associated with the implementation of unitary local government across Nottingham and Nottinghamshire, taking more precise account of data concerning:
  - the establishments of all impacted councils;
  - assets and liabilities (including physical assets, reserves, debt and MRP); contracting and other partnership arrangements; IT architecture; grant funding and additional income; and Council Tax implications.
- Developing the investment and benefit profiles that will drive implementation.
- Developing the investment strategy required to fund implementation.

5. Appendix

Appendix A: List of criteria deep-dives prepared to inform analysis

Title	Prepared by	Date	Description	Conclusion
'Sensible Economic Areas' for Local Government Reorganisation in Nottingham and Nottinghamshire	Council officers across the nine Nottingham Nottinghamshire authorities.	23/05/2025	The analysis provides an overview of travel to work, economic self-containment, housing market areas and service market for consumers for the three options.	Concludes that the differences in degree of fit are too narrow to be able to identify a clear better fit, though Option 1(e) marginally (< 1 percent) provides a stronger fit with the Travel to Work Area (TTWA) and the Housing Market Area (HMA).
Assessment of proposed options for unitary local government in Nottinghamshire in terms of increasing housing supply and meeting local needs	This report has been prepared in conjunction with Nottingham and Nottinghamshire Heads of Planning and has been shared with officers of the East Midlands Combined County Authority.	07/05/2025	The analysis provides an overview of impact on potential to increase long term housing supply, impact on transition to system of a Spatial Development Strategy & Local Plans, impact on meeting local housing needs and impact on other issues such as mineral and wasting planning.	Concludes that Option 1(b) may not accelerate housing supply in the same way that Option 1(e) might, with 1(e) potentially having a wider mix of housing supply sources and reflecting existing joint workings on GNSP.
Assessment of potential options for unitary local government in Nottingham and Nottinghamshire in context of Adult Social Care services	Council officers across the nine Nottingham Nottinghamshire authorities.	05/2025	The analysis provides an overview of homelessness in Nottingham and Nottinghamshire along with the opportunities, risk, service delivery impacts and data analysis of the three options.	Option 1(b) is the preferred option due to its alignment with geographic and demographic characteristics of Nottingham City. Broxtowe and Gedling are better integrated with the city's infrastructure and facilities.
Assessment of potential options for unitary local government in Nottingham and Nottinghamshire in context of Homelessness	The document has been developed by a core group of lead officers representing the local authorities with the support and consultation of a wider cohort of officers from each district, borough, City and also the County Council.	05/2025	The analysis provides an overview of homelessness in Nottingham and Nottinghamshire along with the opportunities, risk, service delivery impacts and data analysis of the three options.	The analysis does not identify a preferred option. Under both Option 1(b) and Option 1(e) there could be reduced homelessness impact due to changes in administrative boundaries and service configurations.
Assessment of potential options for unitary local government in Nottingham and Nottinghamshire in context of Children's SEND services	Council officers across the nine Nottingham Nottinghamshire authorities.	05/2025	The analysis provides an overview of SEND services in Nottingham and Nottinghamshire along with the opportunities, risk, service delivery impacts and data analysis of the three options.	Option 1(b) is the preferred option as it best aligns with the goals of local government reorganisation, offering a balanced distribution of demand and service delivery for SEND and not posing challenges to the reallocation of resources, workforce, or caseloads.
Assessment of potential options for unitary local government in Nottingham and Nottinghamshire in context of Children's Social Care services	Council officers across the nine Nottingham Nottinghamshire authorities.	05/2025	The analysis provides an overview of Children's Social Care Services in Nottingham and Nottinghamshire along with the opportunities, risk, service delivery impacts and data analysis of the three options.	Option 1(b) is the preferred option as Broxtowe and Gedling more closely align to Nottingham City in terms of levels and types of safeguarding needs, which would allow for more targeted / focused service delivery models to be deployed.

Nottingham & Nottinghamshire Councils

Local Government Reorganisation

July 2025

Nottingham City Council

Nottinghamshire County Council

Bassetlaw DISTRICT COUNCIL — North Nottinghamshire —

Broxtowe Borough COUNCIL

Gedling Borough Council

Mansfield District Council

Newark & Sherwood District Council

Rushcliffe Borough Council

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Options Appraisal for Local Government Reorganisation across Nottingham and Nottinghamshire councils in line with the requirements of the Government's English Devolution White Paper published in December 2024.

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1. Executive Summary

PwC supported the production of this report (which details the results of collaborative discussions between the councils) and:

- *Assisted with the options appraisal of the different formations of unitary council we have considered.*
- *Conducted financial analysis of those unitary options.*

For the avoidance of doubt, PwC's input was provided solely with our interests in mind, for our use only, and may not be relied upon by any other party.

Executive Summary: Summary

This document provides and options analysis for local government reform (LGR) in Nottingham and Nottinghamshire. It support and builds on analysis undertaken to support the submission of an interim plan by the Nottingham and Nottinghamshire councils to MHCLG in March 2025.

Phase 1 (January - March 2025)

MHCLG officially set out their formal LGR criteria to all councils in Nottingham and Nottinghamshire on 5th February 2025, with supplementary guidance provided (in response to the interim plan) in June 2025.

Through independent analysis, engagement with Chief Executives and Section 151 officers, an options appraisal for future council arrangements in Nottingham and Nottinghamshire was developed. This has led to the identification of three potential options for LGR (from a long list of eight) which, on agreement with the Leaders / Mayor were included within the interim plan submitted to Government.

Given the rapid timeframe, it was agreed that further work should be undertaken following the interim plan, including a range of activities to deepen the appraisal of the three options.



Phase 2 (May - June 2025)

In considering how each shortlisted option might satisfy the MHCLG criteria, it was agreed in May 2025 that the identified options should be further appraised through additional analysis against the government's framework.

The additional analysis prepared has particularly focussed on:

- **Sensible economic area**
- **Sensible Geography**
- **Impact on crucial services**

Each of the three options offer different strengths and challenges, though Options 1(b) and 1(e) (as set out on page 33) were found to provide the strongest alignment to the set criteria.

The additional analysis undertaken demonstrated that Option 2 is the least aligned, and that the differences in degree of alignment between Options 1(b) and 1(e) are marginal.

This document sets out how each of the three options aligns to the MHCLG criteria and includes updated financial modelling to reflect a review of the assumptions which has been discussed with s151 officers over the course of the last few weeks.

Executive Summary: Updated financial analysis

The financial analysis, methodology and assumptions applied have been shared, tested and talked through with s151 officers. All councils have accepted the financial analysis as complete with each s151 officer providing assurance on the model and underlying assumptions. This analysis is to support the options analysis stage only. Significantly more work will be needed for a financial case that supports a full proposal.

	Transition costs (£)	Annual benefits (£)	Net benefit after five years (£ total)	Payback period (years)
Option 1: 1(b) & 1(e)	£28,848,294	£24,620,878	£64,711,043	1.3
Option 2: Nottinghamshire & Nottingham City	£21,250,744	£24,620,878	£72,308,593	Less than 1 year
Option 3: Single Unitary Authority	£19,249,433	£30,044,575	£94,919,953	Less than 1 year

Comparative purposes only

The methodology is set out in Appendix B and includes a clarification as to what is and isn't covered for the purposes of an options analysis. There are some considerations for the full financial case that have not been included at this stage including potential impact of the Fair Funding Review 2.0 which is currently in live consultation.

Executive Summary: Process to date

Following the publication of the White Paper, significant activity has taken place in order to agree a local response, to test potential models for reorganisation, to document the outcomes of that analysis, and to present a comprehensive set of information for Chief Executives and Members to consider. The process followed is set out below:

Page 7 | Page 22 | Page 27 | Page 31 | Page 63 | Page 72

Background & Context	Case for Change	Options analysis to March 2025	Options Appraisal post March 2025	Financial Analysis	Implementation
The potential benefits for councils in the area in both national and local contexts were explored using locally agreed criteria and the criteria provided by MHCLG.	The case for change examines opportunities to address inefficiencies and disconnections in the current two-tier system and evaluates the potential opportunities that could be driven by local government reform.	The approach undertaken to shortlist options to take forward to implementation. The shortlist was discussed by the Leaders / Mayor of the nine councils.	Qualitative assessment of the options were combined with comparative analysis of local economies, geography and deprivation to consider the alignment of options to MHCLG criteria.	A high level financial analysis was undertaken to evaluate the potential benefits, costs and savings associated with creating new unitary authorities.	This section sets out the considerations for implementation and the likely timescales as well as the potential outlining the activities and resources required.

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2. Background and Context

2a. National Context

National Context: Devolution and reform

The **English Devolution White Paper** published in late 2024 by MHCLG, outlined a shift in the approach and ambition for reorganising and decentralising power to Local Government in England

The White Paper sets out as the default an enhanced Devolution Framework clarifying the powers available to each type of Authority and the aspiration regarding the types of powers and funding arrangements that will exist in future. This was a distinct shift from previous approaches, built around a bespoke devolution 'deals'. This new approach seeks to empower local authorities to address existing financial sustainability and local service challenges by:

- Allowing for increased powers to be vested in local and regional government supported by new funding frameworks and integrated funding settlements;
- Structuring these new entities to cover larger geographies, but to retain logical boundaries which avoid 'islands' between reorganised areas, and which resonate with local identity;
- Implementing these radical changes at pace, accelerating delivery of benefits.

Reorganisation:
The transition to unitary authorities will ultimately remove the 'two tier' model of delivery from the map. This will involve the creation of new unitary councils which take the place of the current county, city and districts.

Devolution:
Creation of Strategic Authorities which will coordinate and commission services at a regional level. This could include the collaboration of multiple unitary authorities to provide a strategic regional authority. The White Paper includes specific ambitions and incentives for these authorities to drive economic growth and lead on strategic planning and transport.



National Context: "*a once in a generation opportunity*"

Government has set out their ambition to make the most of a '*once in a generation*' opportunity to improve the way that local and regional government operated in England. The aim is to create the conditions for economic growth, reduce duplication and fragmentation and create greater efficiencies in public spending and service delivery.



Transform service delivery: LGR should be a catalyst for transformation, beginning with the establishment of new unitary councils. This provides a rare opportunity to redesign ways of working from the ground up and to deliver greater consistency across all services. It also allows for the opportunity to share the best of what is done currently, and to deploy it at scale to support broader public service reform.



Increased efficiency: There is duplication and fragmentation across local government as a result of the way the two-tier system has developed over a number of years. LGR creates an opportunity to address this by consolidating common functions, bringing together services that are currently split across more than one tier, make better use of new and emerging technology and reduce the volume of systems or assets that are currently in place.



Establish a stronger voice for the place: There is an opportunity to develop a stronger, more unified voice for the area which supports its growing presence on the regional and national stage. Government has already expressed its view about the importance of unitary local government as part of the devolution agenda, and in future models of system-wide delivery or integrated funding.



Enhance connections with communities: LGR presents an opportunity to create event better connections with local communities, better understand their sense of belonging, and to design models of service delivery that are effective. A number of the unitary councils established during previous rounds of LGR have adopted similar new arrangements, using the raised profile of democratic accountability to promote and enhance the connection with their communities.



Growth & Prosperity: Continued accelerated growth which reaches all parts of the area requires a strategy that builds on regional priorities and opportunities. The conditions for future prosperity will be influenced by new infrastructure and investment which that require a place-based approach across a wider geography. This is a key priority for regional and local government who will need to work together in different ways to achieve this.

National Context: MHCLG ambitions for local government reform

MHCLG officially set out their formal criteria correspondence to all 21 two-tier areas across England on 5th February 2025.[1] Set out below is a summary of that criteria. The department shared some additional clarifications in June 2025 as part of the response to the interim plan.[2]

Criteria 1	Criteria 2	Criteria 3	Criteria 4	Criteria 5	Criteria 6
Establishing a single tier of government for the whole area	**Improve efficiencies, capacity and withstand financial shocks**	**Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens**	**Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views**	**New unitary structures must support devolution arrangements**	**New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment**
Sensible economic areas, with an appropriate tax base. A sensible geography which will help to increase housing supply and meet local needs. Proposals need to be supported by robust evidence and analysis and include an explanation of the outcomes. There is a need to describe clearly the single tier local government structures it is putting forward for the whole of the area, and explain how, if implemented, these are expected to achieve the outcomes described.	New councils should aim for a population of 500,000 or more. There may be scenarios in which this does not make sense for an area, including on devolution. Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money. Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets.	Proposals should show how new structures will improve local government and service delivery, and should avoid unnecessary fragmentation of services. Opportunities to deliver public service reform should be identified, including where they will lead to better value for money. Consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety.	It is for councils to decide how best to engage locally in a meaningful and constructive way. Proposals should consider issues of local identity and cultural and historic importance. Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.	Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor. Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.	Proposals will need to explain plans to make sure that communities are engaged. Where there are already arrangements in place it should be explained how these will enable strong community engagement.

Source: [1] MHCLG Criteria February 2025
[2] MHCLG Criteria June 2025

2b. Local Context

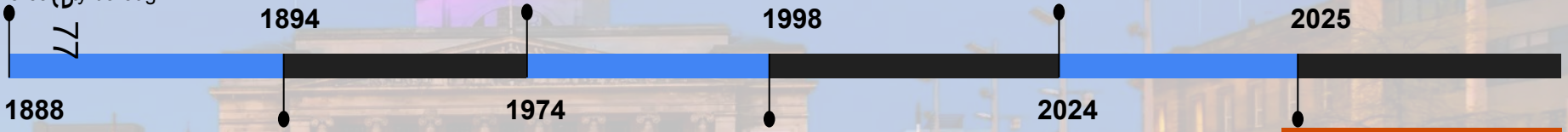
Local Context: Existing two-tier local government

Local government across Nottinghamshire has seen major changes in governance arrangements over time.
In 1992, unitary authorities were created, and by 1998, Nottingham City Council regained full responsibility for local services, while the county continued to operate a two-tier system with District councils.

Creation of Nottinghamshire County Council
The Local Government Act 1888 established Nottinghamshire County Council for rural governance. Nottingham became a county borough.

Local Government Reorganisation
This introduced a two-tier system, with Nottinghamshire County Council overseeing strategic services while district and borough council managed local matters.

East Midlands Combined County Authority
Nottingham and Nottinghamshire councils become constituent members of the EMCCA which held its first Mayoral election in May 2024.



The Local Government Act
This act created urban and rural district councils, further refining local governance and replacing older parish vestries.

Nottingham Becomes a Unitary Authority
The City of Nottingham regained unitary authority status, separating from Nottinghamshire County Council and restoring control over key services

Devolution and LGR white paper
The Leaders / Mayor from all nine councils in Nottingham and Nottinghamshire began reviewing options for local government reform.

Local Context: The ambition to drive public sector reform

In response to the White Paper shared on 16th December 2024, and in advance of the statutory invitation being received from MHCLG, the nine councils agreed a series of local priorities which are set out below:

How people live their lives

- Covers a credible geography – reflecting how places function economically and how people live their lives
- Reflects community identity and makes sense as a “Place” including spatial characteristics
- Enables sustainable operational delivery for public services
- Seeks to improve connectivity especially for communities that most need support

Financial and fiscal sustainability

- Financially sustainable local authorities, which are resilient to longer-term economic or policy changes by balancing income and need
- Delivers value for money through economy, efficiency and effectiveness
- Delivers financial benefits which outweigh the cost of change
- Risk informed with effective mitigation measures
- Considers the future Council Tax base and equalisation across new authority areas

Offers the potential for public service reform that improves outcomes and experiences for residents

- Enables solutions to challenges impacting on residents’ outcomes and which risk long-term financial stability
- Provides safe and resilient support, help and protection and care to vulnerable children, families and adults
- Aligns with EMCCA to enable creation and delivery of services for Nottinghamshire and Derbyshire
- Considers alignment with all other key strategic partners
- Maximises opportunity to enhance delivery through innovation

Enables strong, local accountability and connection to communities and neighbourhoods

- Ensures services are easily accessible for all
- Strengthens the role of local democratic leadership
- Builds trust with local communities
- Seeks the active input and engagement of residents, businesses and employees

Local Context: East Midlands Combined County Authority

The East Midlands Combined County Authority (EMCCA) has a strategic purpose to address economic, planning and infrastructure needs at a regional level. Further devolution deals under the proposed strategic authority framework will provide a means to unlocking additional central government (integrated) funding arrangements and greater powers with delivery responsibilities sitting with new unitary authorities.

EMCCA's Background

The East Midlands Combined County Authority (EMCCA) was officially established on 28th February 2024.

The EMCCA is a partnership of local authorities working across the region to leverage devolved funding.

An elected Mayor and board with decision-making powers is in place. This creates the conditions for greater local autonomy and will over time gain further strategic powers and devolved central government funding.

What constitutes the EMCCA?

In November 2022, a devolution deal was agreed by the four upper-tier councils:

- Derbyshire County Council
- Nottinghamshire County Council
- Derby City Council
- Nottingham City Council

This secured a £1.1bn investment package, spread over a 30-year period, alongside devolved powers around transport, housing, skills and adult education, economic development and net zero.

EMCCA's Priorities

EMCCA's shared ambition for the region focuses on:

- Growing the region's economy through targeting investment to drive growth
- Improving transport links for better connectivity
- Increasing housing availability
- Enhancing skills development to create demand and supply within the region
- Supporting green initiatives
- Improving health outcomes



Local Context: Role of EMCCA and new unitary authorities

Determining how the new councils will work with EMCCA will form part of the full business case. Several factors should be considered when defining this relationship including MHCLG criteria, existing and future aims and objectives and community expectations of each body as well as the opportunity for wider public service reform.

The role that unitary authorities will play in service delivery, within the context of the newly created EMCCA, will need to be agreed during implementation. Initial factors for considerations are outlined below:

(1) Criteria: *What does 'one layer of local government for the whole area' imply?*

MHCLG Criteria 1 requires proposals to achieve the establishment of a single tier of local government. For Nottingham and Nottinghamshire, EMCCA will set the strategic direction, and the new councils will have an operational focus.

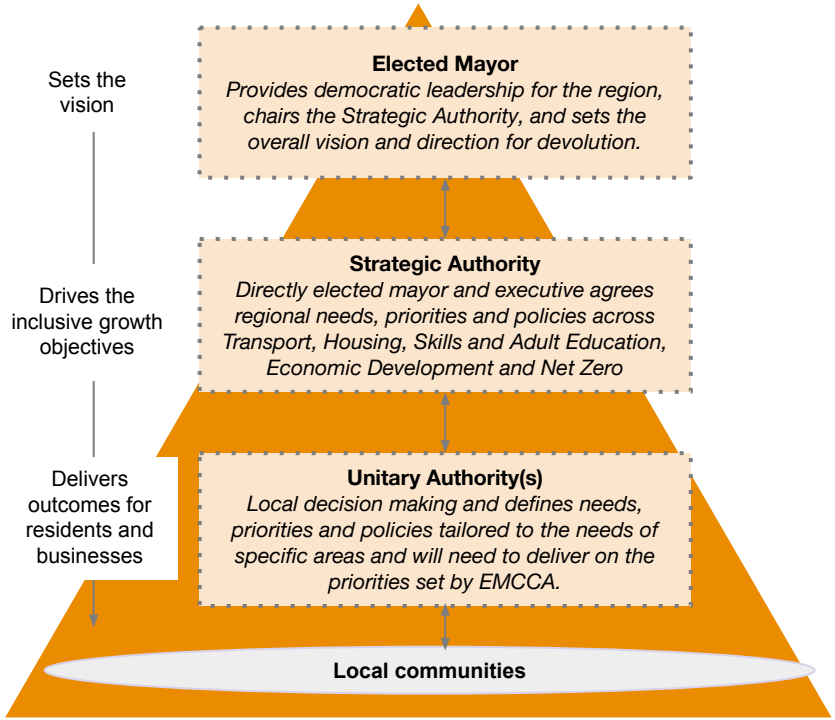
(2) Purpose: *What are the aims and objectives of each body?*

EMCCA has powers relating to transport, housing and skills – alongside leading the economic strategy of the region. Several key aims have been identified within the EMCCA Strategic Framework that sets out an initial broad vision rooted in 'inclusive growth'. The Strategic Authority will set the growth agenda and lead decisions on the direction of spatial planning, transport and skills provision.

This will be overseen by the EMCCA Inclusive Growth Commission, which sets out the view that growth is essential to creating successful communities that are people-centred and focus on education, wellbeing, public safety, healthcare, infrastructure, housing and assets.

(3) Community: *What would a resident expected of each body?*

Residents will expect councils to continue providing vital services to their community and championing their towns, rural communities and cities, whilst EMCCA will be expected to deliver transport links, business development and employment opportunities that support places and inclusive growth.



Local Context: Geography, population and council spend

Set out below and across the next four pages is a snapshot of the context in which all nine councils are operating which has fed into the comparative analysis undertaken, aligned to local and MHCLG criteria.

Nottinghamshire is currently served by multiple tiers of local governance. Nottinghamshire County Council is responsible for education, social care and highways, while seven district and borough councils provide services such as housing, waste collection and local planning. Nottingham City Council operates as a unitary authority, distinct from Nottinghamshire County Council, managing all local government functions within its boundaries.

The county is represented by 11 parliamentary constituencies, many of which closely align with district and borough boundaries.

Nottinghamshire shares a boundary with several neighbouring counties: Derbyshire to the west, South Yorkshire to the north, Lincolnshire to the east and Leicestershire to the south. EMCCA is comprised of Nottinghamshire, Derbyshire and the cities of Nottingham and Derby.

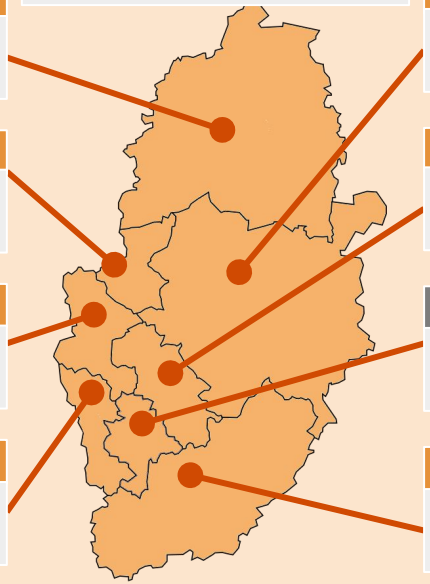
Nottinghamshire County
Population: 844,494
Total annual net spend: £1.2bn

Bassetlaw
Population: 122,286
Total annual net spend: £21.2m

Mansfield
Population: 112,091
Total annual net spend: £15.2m

Ashfield
Population: 128,360
Total annual net spend: £22.0m

Broxtowe
Population: 113,172
Total annual net spend: £14.7m



Newark and Sherwood
Population: 126,168
Total annual net spend: £22.6m

Gedling
Population: 118,563
Total annual net spend: £15.6m

Nottingham City
Population: 329,276
Total annual net spend: £632.9m

Rushcliffe
Population: 123,854
Total annual net spend: £16.8m

Sources:
[1] ONS Estimates of the population for England and Wales Mid- 2023: local authority boundary edition
[2] Nottinghamshire County Council revenue budget statement FY24/25

Local Context: Place & Demography

Nottinghamshire has a diverse socio-economic profile, with place and demographic trends indicating contrasts between urban and rural areas as well as across those places which are historically industrial compared to those which are experiencing growth in new sectors. It is important that any reorganisation considers the diverse place and demography across the wider area.

19.0% of the Nottinghamshire population is aged over 65, and is projected to rise by over 30.0% by 2034. Bassetlaw has the highest proportion of over 65's, while Nottingham City has the lowest.

Gross disposable income is highest in Rushcliffe, at £23,828, and lowest in Nottingham City, at £15,015. This compares to a national average of £20,425.

Bassetlaw has the lowest population density within the area at 110 people per square km. Nottingham City is the most densely populated as 4,338 people per square km.

The further education and skills participation is highest in Nottingham City, at 6,545 per 100,000 population, and lowest in Rushcliffe, at 4,435 per 100,000 population.

Ethnic diversity varies, with Nottingham city the most diverse (65.9% white; 14.9% Asian, Asian British or Welsh; 10.0% Black, Black British or Welsh, Caribbean or African) and Bassetlaw the least.

Nottingham City has the highest proportion of its population claiming out of work benefits, 6.3%, and Rushcliffe the lowest at 2.1%.

Nottingham City is facing economic challenges as a result of growth constraints, whilst northern districts are more deprived and some districts such as Rushcliffe have older populations overall.



Sources:
[1] ONS Estimates of the population for England and Wales Mid- 2023: local authority boundary edition
[2] ONS Census: Gross disposable household income (2021)
[3] Nomis Population Density (2021)
[4] ONS Census 2021: Further Education and skills participation
[5] ONS Census Ethnic group, England and Wales
[6] ONS Claimant Count (2024)

Local Context: Economic Geography

Latest data on Gross Value Added (GVA) demonstrates strong ties in the manufacturing and wholesale / retail trade sectors, with at least one of these sectors being a significant part of each district's economy. Any new unitary authorities will need to carefully consider the sectors it intends to nurture, the type of inward investment it will seek and what type of economy would be created as a result. EMCCA clearly has a significant leadership role in this.

Local Authority City / District	Largest in GVA terms (2022)		2nd largest in GVA terms (2022)		3rd largest in GVA terms (2022)	
	Sector	%	Sector	%	Sector	%
Ashfield	Manufacturing	19.4%	Human health and social work activities	18.5%	Construction	13.6%
Bassetlaw	Manufacturing	20.8%	Wholesale and retail trade	12.3%	Human health and social work activities	11.1%
Broxtowe	Manufacturing	24.2%	Real estate activities	12.7%	Wholesale and retail trade	11.8%
Gedling	Real estate activities	18.2%	Manufacturing	15.7%	Wholesale and retail trade	14.9%
Mansfield	Wholesale and retail trade	16.8%	Real estate activities	11.6%	Manufacturing	11.6%
Newark & Sherwood	Manufacturing	12.6%	Real estate activities	11.4%	Information and communication	9.9%
Nottingham	Education	13.7%	Human health and social work activities	12.4%	Wholesale and retail trade	11.8%
Rushcliffe	Professional, scientific and technical activities	22.9%	Real estate activities	13.3%	Wholesale and retail trade	10.7%

Sources:
[1] ONS - Regional gross value added (balanced) by industry: local authorities by ITL1 region

Local Context: Transport and Connectivity

Nottinghamshire's transport network is designed to support economic hubs and growing commuter flows. Greater investment is required to enhance connectivity and mobility. It is important that any reorganisation efforts consider the existing transport and infrastructure arrangements.

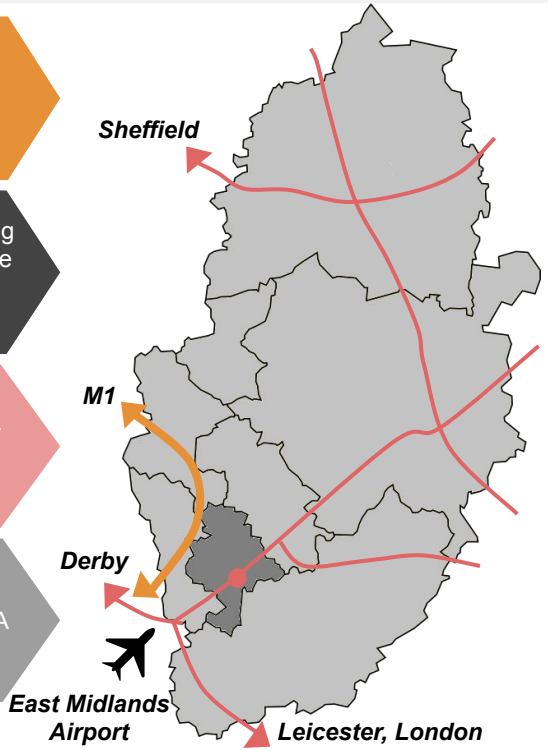
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Transport data reveals significant commuting patterns, particularly the dominance of Nottingham as a key employment hub, attracting 73% of workers from within the city, 42% from Gedling and 35% from Rushcliffe. Mansfield and Newark and Sherwood are also major employment centers, with 55% of Mansfield's workforce living locally and 59% of Newark and Sherwoods' workforce employed within the area. However, smaller employment flows exist across districts, demonstrating localised economies with some regional mobility.

Transport infrastructure supports current movements, with the M1, A1, and major rail links providing connectivity. Though transport is challenging in rural areas where one-third of the population resides. Increasing vehicle use is evident, with Nottinghamshire's road traffic rising from 3.9bn miles in 2020 to 4.8bn in 2023, while Nottingham's traffic grew from 885m miles to 1.1bn miles in the same period. Strategic planning for transport and services after LGR will be crucial to maintaining connectivity and overall will be the responsibility of EMCCA.

Nottingham City Council has secured over £250m since 2019 to enhance its transport network. Key programmes include Transforming Cities for better connectivity, the Bus Service Improvement Plan for greener buses, Future Transport Zones for innovative mobility, the Levelling Up Fund for safer streets, and the Active Travel Fund to promote walking and cycling. These support the city's long-term transport vision.

In the context of LGR, transport planning must remain coordinated and efficient to support economic connectivity and service integration. Many transport projects, such as Transforming Cities and the Bus Service Improvement Plan, are currently delivered in partnership between Nottingham and Nottinghamshire Councils. A shift to two unitaries, for example, would require a strategy to avoid duplication, ensure efficiency, and coordinate investment across the area. EMCCA will have a leadership role in this as the Strategic Authority.



Sources:
[1] Nottinghamshire Local Transport Plan 2011-2026

Local Context: Strategic Partnerships

Strong partnerships exist across Nottingham and Nottinghamshire which provide the basis to drive better outcomes and wider public sector reform. The majority operate within coterminous boundaries. Some examples of these are set out below.

Regional Government

The East Midlands Combined County Authority (EMCCA) was officially established on 28th February 2024, with the Mayor elected in May 2024.

Initial devolved funding arrangements and powers are in place governed by an elected Mayor and board with decision-making powers. There is an opportunity for EMCCA to become a strategic authority under the arrangements set out in the White Paper.

Health Partners

Nottingham and Nottinghamshire Integrated Care System (ICS): This partnership brings together the wider system to commission and deliver integrated health and care services, including primary care across the whole Nottingham and Nottinghamshire area.

Within Nottinghamshire, there are four Place Based Partnerships (PBPs):



1. Bassetlaw Place Based Partnership *(also part of South Yorkshire ICS)*
2. Mid Nottinghamshire Place Based Partnership
3. South Nottinghamshire Place Based Partnership
4. Nottingham City Place Based Partnership

Private Sector & VCSE

Nottingham and Nottinghamshire Voluntary, Community and Social Enterprise (VCSE) Alliance: Established in July 2022, this alliance comprises VCSE organisations across the region, acting as a single point of contact to generate citizen intelligence from the communities they serve. The alliance collaborates with statutory partners to improve outcomes for residents.

Since 2016, Arc Partnership - a joint venture between Nottinghamshire County Council and SCAPE - has delivered 3,511 community projects and secured £394m in investment. It provides property design, consultancy, regeneration, and asset management services.

Community Safety

There are a range of community safety partnerships across Nottingham and Nottinghamshire.

Community Safety Partnerships (CSPs): County/City Councils are required to participate in CSPs, which involve collaboration with police, fire services, health services, and other agencies to develop strategies for reducing crime and improving community safety e.g. the Nottingham Community Safety Partnership. Also, in two-tier areas there is a statutory requirement to have a strategic county coordinating group, the Safer Nottinghamshire Board (SNB).

Nottingham City and Nottinghamshire has one police force, which is split into 12 smaller neighbourhood policing areas, allowing local officers to work closely with communities.

3. Case for Change

Case For Change: Opportunities

Local government reform in Nottingham and Nottinghamshire presents an opportunity to address inefficiencies in the current two-tier system, which creates duplication, administrative complexity, and inconsistent service delivery.

Opportunities

Nottingham and Nottinghamshire have already embarked on a journey to devolution as part of EMCCA and LGR offers an opportunity to underpin this with a local structure that supports and complements the regional authority. A new unitary authority which encompasses an expanded city area would create space to grow, in turn providing opportunity to align urban planning and services. For example, with 6,565 additional homes required in Nottingham City over the forecast period 2022/27, reorganisation may enhance housing provision by balancing resources across a larger geographical area and tax base.

A simplified governance model would consolidate local service delivery under two new unitary authorities. This approach can enhance efficiency and consistency across a wider geography and community, ensuring seamless, equitable and cost-effective provision of key services. It also provides clarity for residents on where responsibilities for delivery of local services lies, and the respective layers of democratic representation.

Building on the Progress of EMCCA

Strengthening Regional Governance 1	LGR can help ensure that local councils work more efficiently with EMCCA, avoiding fragmented governance and complex decision-making processes.
Attracting More Investment 2	EMCCA can unlock significant funding and access to regional and national investment, while a streamlined local government structure simplifies bidding and fund management and delivery once funding is secured.
Supporting Economic Growth 3	Aligning LGR choices with the regional strategy and economic vision by simplifying the two-tier system decision-making and implementation.
Enhancing Democratic Accountability 4	LGR creates clearer governance, strengthening local authority ties with EMCCA and ensuring transparent, accountable decision-making for residents and businesses.

Case For Change: Limitations in the current system

Rising financial pressures on local councils highlight the urgent need for governance reform, with unitary authorities bringing together services with opportunities for future transformation, offering a pathway to improved stability, efficiency, and accountability.

Limitations

The current two-tier system can be confusing for residents and businesses regarding the responsibility for service provision (*see page 25*), and creates considerable customer demand in redirecting and supporting enquiries. Multiple district councils increases the challenge of coordination, and while collaboration across Nottingham and Nottinghamshire is generally productive and positive, delivering complex services such as housing, planning and economic growth is more challenging across multiple organisations. The recent reliance on bidding processes for central government funding places local areas in a competitive rather than collaborative space, resulting in potential gaps in service delivery, or in unequal provision of support across the area.

There are wider partnership challenges as the number of organisations that need to be involved in decision-making processes or operational delivery is significant. This is a system-wide issue and not just limited to local government arrangements.

.

Escalating challenges in Financial Stability

Nottingham City Council is under a Best Value Intervention Framework review due to financial challenges. To comply with the Best Value Duty, it developed a framework within its 'Together for Nottingham' plan, aimed at improving service delivery and meeting statutory obligations. Rising demand for key services, particularly adult social care, alongside economic pressures has intensified financial strain. In 2024/25, the council required £41.0m in Exceptional Financial Support to balance its budget. To address ongoing challenges, it proposed £17.9m in savings and income measures for 2025/26, focusing on financial stability while maintaining essential services.

Projections at the time of this analysis indicated a budget pressure of £27m in 2024/25 for Nottinghamshire County Council, with more significant pressures identified in subsequent years. To address financial challenges, the council has proposed various service efficiencies aimed at maintaining value for money while delivering its priorities.

There is also a live consultation on Fair Funding 2.0 which is likely to result in changes in funding levels for all councils in the area.

Case For Change: Services

The existing two-tier system has the potential to lead to service duplication. Local Government Reform offers a chance to simplify services, optimise resources, and enhance outcomes for residents. The types of local authorities and the services provided by each district are outlined below.

Type	Name	Community Safety & Trading Standards	Economic Develop-ment	Education & Schools	Highways Roads & Transport	Housing	Licencing & Public Protection	Parks, Leisure & Culture	Planning & Building Control	Public Health	Social care	Waste disposal / recycling	Waste Collection
Unitary Authority	Nottingham City	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
County Council	Nottinghamshire County	✓	✓	✓	✓			✓	*	✓	✓	✓	
District Authority	Ashfield	✓	✓			✓	✓	✓	✓				✓
District Authority	Bassetlaw	✓	✓			✓	✓	✓	✓				✓
District Authority	Broxtowe	✓	✓			✓	✓	✓	✓				✓
District Authority	Gedling	✓	✓			✓	✓	✓	✓				✓
District Authority	Mansfield	✓	✓			✓	✓	✓	✓				✓
District Authority	Newark & Sherwood	✓	✓			✓	✓	✓	✓				✓
District Authority	Rushcliffe	✓	✓			✓	✓	✓	✓				✓

* Nottinghamshire County Council provides planning and building services in the form of Strategic Planning

Case For Change: Democracy

Democratic services across Nottinghamshire, the city and districts manage a significant amount of electoral services activity, including rolling registration, election administration and supporting committees of their respective councils. Unitary councils would result in one set of local elections per authority (as currently take place in Nottingham City):

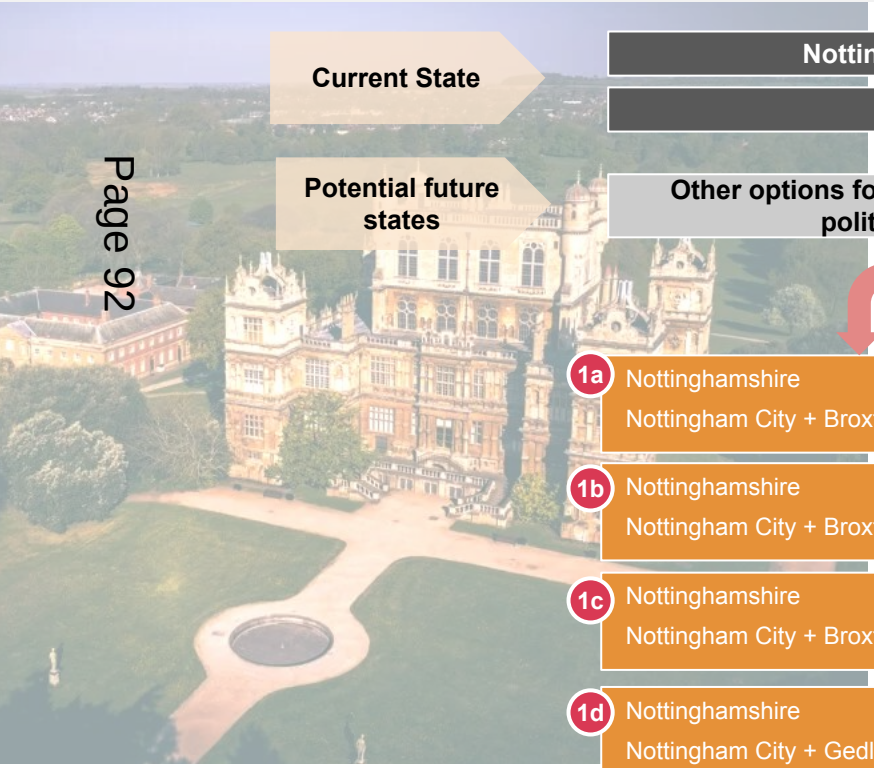
Local Election	Number of Councillors[3]	Election Cycle[3]	Last Election[1]	Votes Cast[1]	Number of electors per council member[3]
Nottinghamshire County Council	66	4 years	2025[2]	287,388[2]	9,404[4]
Nottingham City UA	55	4 years	2023	55,879	3,633
Ashfield	35	4 years	2023	29,594	2,662
Bassetlaw	48	4 years	2023	27,738	1,868
Broxtowe	44	4 years	2023	42,154	1,922
Gedling	41	4 years	2023	31,259	2,185
Mansfield	36	4 years	2023	22,191	2,266
Newark & Sherwood	39	4 years	2023	27,844	2,371
Rushcliffe	44	4 years	2023	39,926	2,095

Sources:
[1] Electoral statistics for the UK 2023; [2] Sum total of votes casted (2025)
[3] Various Sources (2021-2025); [4] The Local Government boundary commission

4. Options analysis to March 2025

Summary of Options: Overview

A number of two unitary authority options were identified to be part of the initial options appraisal activity taking into account the MHCLG framework and local criteria.



Current State

Nottinghamshire County Council

District Councils

Nottingham City Council

Potential future states

Other options for change discounted for political reasons

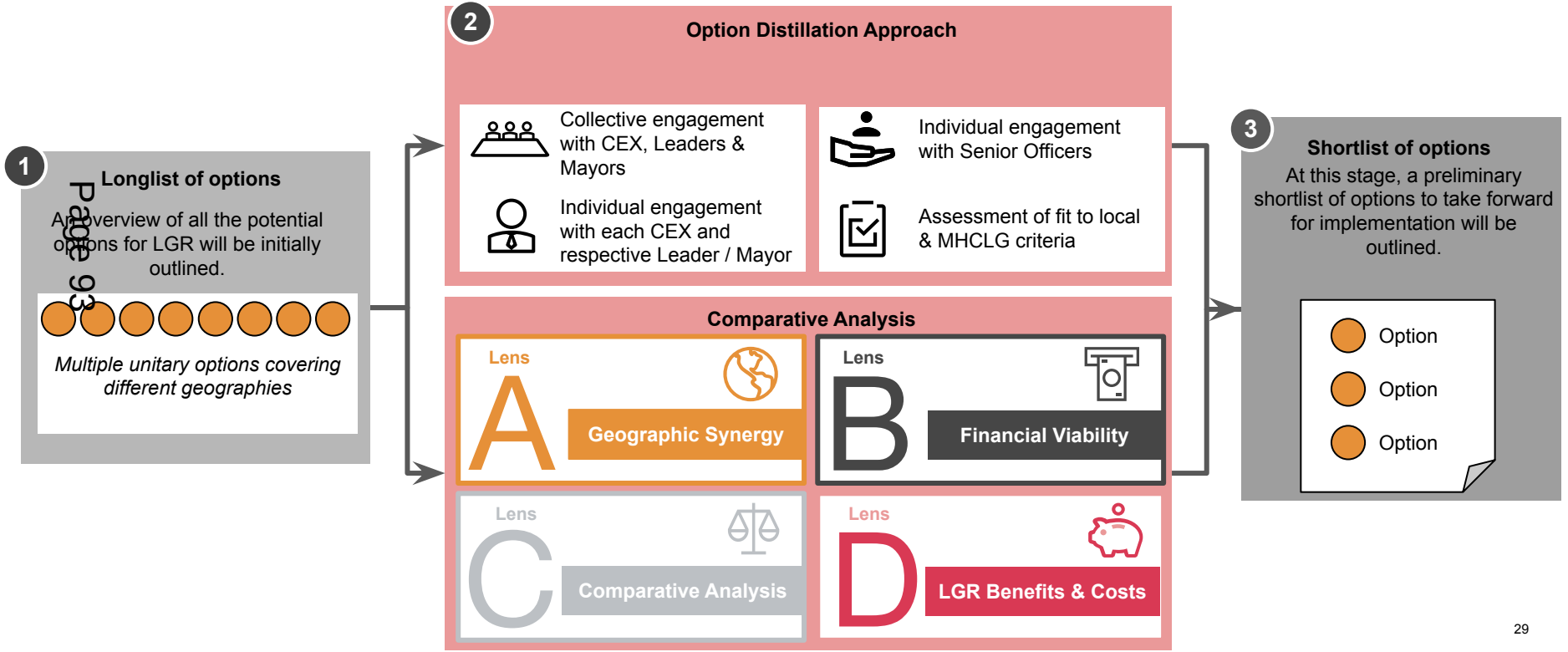
Two Unitary Authorities

Multiple remaining options

- **1a** Nottinghamshire — Nottingham City + Broxtowe + Gedling + Rushcliffe
- **1b** Nottinghamshire — Nottingham City + Broxtowe + Gedling
- **1c** Nottinghamshire — Nottingham City + Broxtowe
- **1d** Nottinghamshire — Nottingham City + Gedling
- **1e** Nottinghamshire — Nottingham City + Broxtowe + Rushcliffe
- **1f** Nottinghamshire — Nottingham City + Rushcliffe
- **1g** Nottinghamshire — Nottingham City + Gedling + Rushcliffe
- **2** Nottinghamshire — Nottingham City

Methodology and Approach: Overview

The process for appraising the initial eight options and distilling to a shortlist of three is set out below. The detail of each of the four lenses of the comparative analysis is set out on the following page.



Comparative Analysis: Overview

Each option was analyses through a series of ‘lenses’ the detail of which is set out below. The summary of the comparative analysis can be found at Appendix C.

Lens A

Geographic Synergy

Geographic Analysis

Analysis of publicly available data to understand the geographic synergy of the two unitary authority options. This will include an understanding of each District’s proportion of rural and urban populations, each Authorities Mosaic Segmentation Profiles and the average time to key services.

Lens B

Financial Viability

Analysis of financial data from individual councils

Analysis of publicly available information to understand the financial viability of two unitary authority options. This will include understanding existing positions on debt to reserve ratios, and measure both current and future Council Tax take in relation to demand for both Adult and Children Social Care.

Lens C

Comparative Analysis

Other relevant information

Analysis of other relevant data points in line with the criteria such as population, deprivation and housing to identify which options are likely to result in the establishment of two councils that are broadly balanced.

Lens D

LGR Benefits & Costs

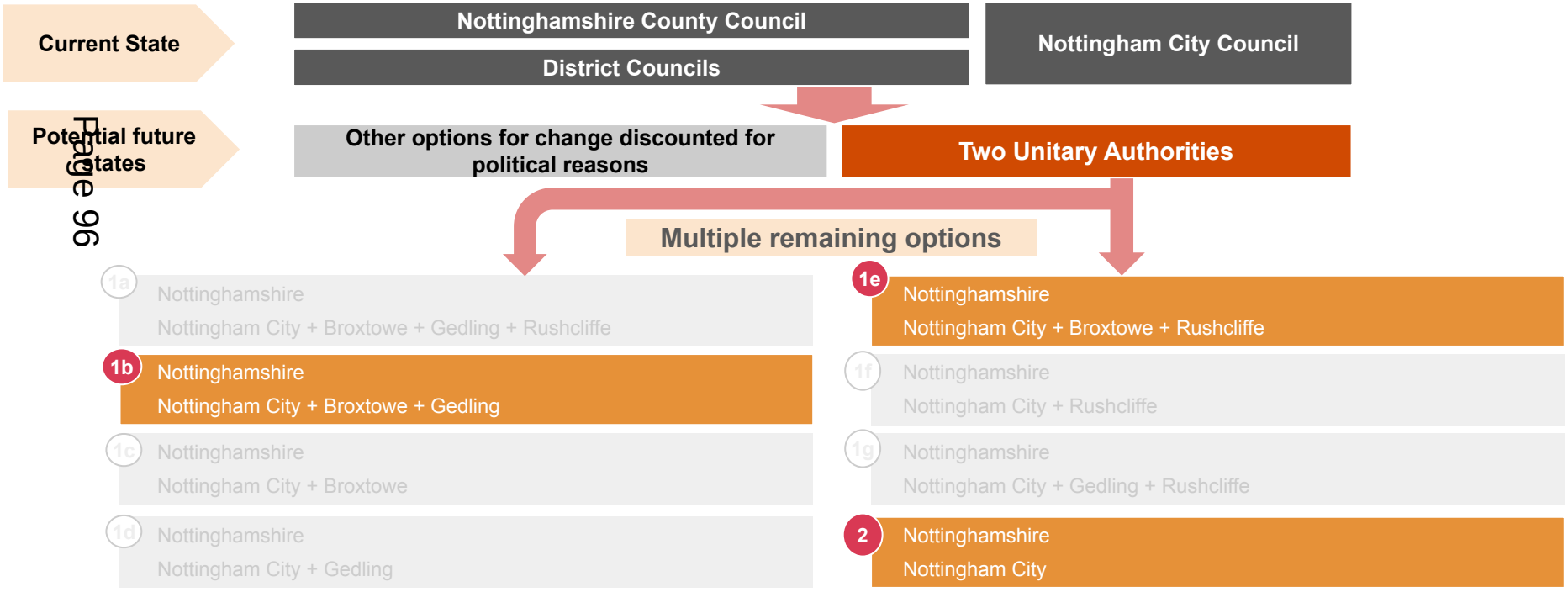
Outcomes of financial modelling

Our financial analysis will be used to assess the benefits and costs of your local government transformation, demonstrating the benefits, costs and savings related to the implementation of a two unitary authority system.

5. Options analysis post March 2025

Summary of Options: Options to take forward (1/2)

As set out in the previous section, the first phase of options analysis distilled eight options to three which were included in the interim plan submitted to Government in March.

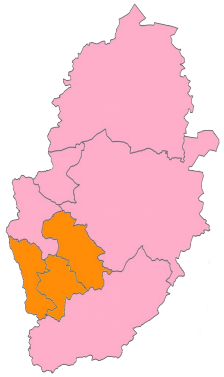
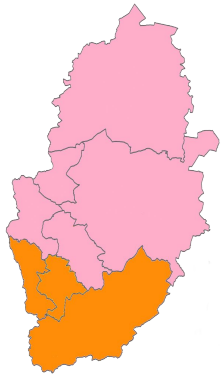
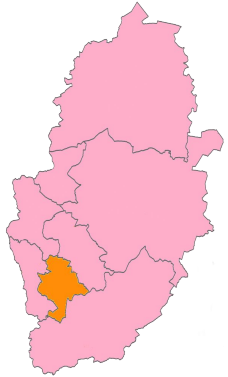


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Key: Proceed to Interim Plan

Summary of Options: Options to take forward (2/2)

The three options set out in the interim plan are described below.

1b **Nottinghamshire and Nottingham City + Broxtowe + Gedling**	1e **Nottinghamshire and Nottingham City + Broxtowe + Rushcliffe**	2 **Nottinghamshire and Nottingham City**
		
1. Nottingham City conurbation to include **Broxtowe and Gedling** 2. The **rest of Nottinghamshire** becomes a new unitary authority	1. Nottingham City conurbation to include **Broxtowe and Rushcliffe** 2. The **rest of Nottinghamshire** becomes a new unitary authority	1. **Nottingham City remains the same** 2. The **rest of the Nottinghamshire** becomes a new unitary authority

Options Appraisal: Detailed analysis of shortlisted options (1/3)

In considering how each shortlisted option might satisfy the MHCLG criteria, it was agreed that further analysis should be undertaken by the nine councils to enable Chief Executives and Members to take a decision on which option(s) to take forward to develop into a full business case for local government reorganisation.

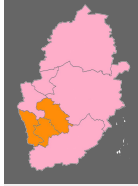
Each option demonstrates varying degrees of alignment with the MHCLG criteria and presents distinct strengths and risks. Key factors that have been considered include financial sustainability, service coordination, and sensible geographic and economic configurations.

Assessment against MHCLG Criteria + **Domain Analysis**

01	Sensible single tier of local government	1(b) Sensible economic breakdown
02	'Right-sized' local local government	
03	High quality, sustainable services	1(c) Sensible geographic breakdown
04	Meets local needs	3(a) Improves local government & service delivery
05	Supports devolution arrangements	3(b) Opportunity for public service reform
06	Local engagement and empowerment	3(C) Improves delivery of, or mitigates risk on crucial services

Relative alignment of LGR criteria among options:

High alignment | Medium alignment | Low alignment



Option 1(b)
Nottinghamshire and Nottingham City + Broxtowe + Gedling

This option demonstrates a somewhat stronger fit against the MHCLG criteria compared to other options. Whilst constraints such as urban capacity and Green Belt review may impact future housing delivery, it combines authorities that are already the most alike in terms of rural / urban settings and aligns with the City's demography and geography, potentially creating a more even requirement for service delivery and equal population / debt-to-reserve ratio based on analysis.

01 02 03 04 05 06



Option 1(e)
Nottinghamshire and Nottingham City + Broxtowe + Rushcliffe

This option demonstrates a strong fit against the MHCLG criteria. It is a marginally stronger fit on travel to work and housing market areas, has a balanced population split, similar deprivation levels, (to 1b) and is comparable in terms of the financial analysis completed to date. The city-based conurbation authority would become predominantly rural with the more diverse Mosaic characteristics, potentially leading to a requirement of different services models across the place.

01 02 03 04 05 06



Option 2
Nottinghamshire and Nottingham City

This option demonstrates the weakest alignment against the MHCLG criteria of the three options under further consideration. It would provides the greatest degree of fragmentation of travel to work, hospital and housing market areas, a significant population and debt-to-reserve imbalance which is the highest amongst all options, significant challenges in coordinating and financing services, and may leave communities that identify with the city in a different geography.

01 02 03 04 05 06

Options Appraisal: Detailed analysis of shortlisted options (2/3)

Additional analysis was completed focussed on key MHCLG criteria including 1(b), 1(c) and 3 as highlighted below. This and previous analysis completed has helped inform the evaluation of each option against all MHCLG criteria.

Criteria	Key factors	Option 1b	Option 1e	Option 2
1 Sensible single tier of local government	*Establishes a single tier of Local Government for the whole of the area concerned*	Medium	High	Low
	Sensible economic breakdown: with a tax base which does not create undue inequalities			
	Sensible geographic breakdown: which will help increase housing supply and meet local needs			
2 'Right-sized' local government	*A population of 500,000 or more (unless specific scenarios make this unreasonable)*	High	High	Low
	Supports efficiencies and value for money for council taxpayers			
	Improves capacity and supports the council to withstand financial shocks			
	Manageable transition costs			
3 High quality, sustainable services	*Improves local government & service delivery, avoiding unnecessary service fragmentation*	High	Medium	Medium
	Opportunity for public service reform including where this will lead to improved value for money			
	Improves delivery of, or mitigates risk to negative impact on crucial services			
4 Meets local needs	*Meets local needs and is informed by local views*	High	Medium	Medium
	Improves / mitigates risk to issues of local identity, cultural and historic importance			
	Addresses local concerns			
5 Supports devolution arrangements	*Helps to support devolution arrangements / unlock devolution*	High	High	Low
	Sensible population size ratios between local authorities and any strategic authority			
6 Local engagement and empowerment	*Enables stronger community engagement*	Medium	Medium	Medium
	Delivers genuine opportunities for neighbourhood empowerment			

Options Appraisal: Detailed analysis of shortlisted options (3/3)

Each LGR model offers different strengths and challenges, though Options 1(b) and (e) would provide the strongest alignment to the MHCLG criteria. Whilst the analysis concludes that Option 2 is the least appropriate option, it also sets out that the differences between Options 1(b) and 1(e) are marginal.

Summary of domain analysis

Sensible Economic Area (SEA) (1a)
The differences in degree of fit are marginal. Option 1(e) (< 1 percent) provides a slightly stronger fit with the Travel to Work Area (TTWA) and the Housing Market Area (HMA) but also will have the complication of housing delivery for the urban conurbation being delivered across two authorities.

Sensible Geography (1b)
Option 1(b) may not accelerate housing supply in the same way that Option 1(e) might, with 1(e) producing two more balanced authorities in size with a wide mix of housing supply sources and reflects existing joint workings on GNSP.

Critical Services (3)
Option 1(b) is overall the preferred choice due to its demographic and geographic similarities. Additionally, it provides a relatively balanced distribution of demand of crucial services.

Criteria	1b Nottinghamshire and Nottingham City + Broxtowe + Gedling	1e Nottinghamshire and Nottingham City + Broxtowe + Rushcliffe	2 Nottinghamshire and Nottingham City
1 *Sensible single tier of local government*	*Strong alignment with SEA criteria but fragments travel to work/housing areas; urban capacity constraints and green belt review could impact future growth beyond current plan*	*Stronger alignment with SEA criteria marginally more than Option 1(b) (<1 percent); wide mix of housing supply resources but supply will be require cross council collaboration.*	*Greatest fragmentation of travel to work and housing market areas and weakest alignment to sensible geography; supply figures look strong through difficult to increase supply in long-term (no green-belt)*
2 *'Right-sized' local government*	*Equal population level (603k vs 661k) though an imbalance in debt-to-reserves ratio (53.5 vs 16.6); financial resilience likely to be met despite imbalance and only marginally less balanced than Option 1(e)*	*Equal population level (611k vs 653k) though an imbalance in debt-to-reserve ratio (47.1 vs 17.5); though is the option with the lowest difference on this factor between authorities*	*Significant population imbalance and highest amongst all options (352k vs 912k); financial resilience a concern as debt-to-reserve reaction significantly unbalanced (83.9 vs 16.5)*
3 *High quality, sustainable services*	*Provides a balanced distribution of demand and services for homelessness, ASC, CSC and SEND; has the best demographic and geographic makeup for service delivery.*	*Provides a relatively balanced distribution of demand and services for homelessness and ASC; there are challenges around SEND as Rushcliffe has a lower demand with varying geography and demography.*	*It creates unitaries with an uneven distribution of services; The demand for homelessness, ASC and SEND is the most varying under this option.*
4 *Meets local needs*	*Combines authorities that are already the most alike in terms of rural / urban settings and most similar clustering of Mosaic segments across both authorities; able to tailor services to specific demographics*	*Combines authorities that are most different in terms of rural / urban settings, with the city-based conurbation authority becoming predominantly rural; difficult to tailor services to specific demographics*	*Combines authorities that are highly alike in terms of rural / urban setting; arguably less likely to satisfy criteria as may leave communities that do identify with the city in a different and rural geography*
5 *Supports devolution arrangements*	*Combined authority already exists within the Nottingham City conurbation and meets the requirements for a sensible population size ratio (603k for Nottingham City and 661k for Nottinghamshire by 2035)*	*Combined authority already exists within the Nottingham City conurbation and meets the requirements for a sensible population size ratio (611k for Nottingham City and 653k for Nottinghamshire by 2035)*	*Combined authority already exists though does not meet requirements for a sensible population (352k for Nottingham City and 912k for Nottinghamshire by 2035) and minimum threshold of 500k population*
6 *Local engagement & empowerment*	*Similar clustering of Mosaic segments and some overlap with Hospital Trusts and Nottingham City Council boundaries though not completely coterminous; new channels required to engage communities*	*Existing efforts to prepare GNSP demonstrates joint engagement and some overlap with Hospital Trusts though not completely coterminous; mix of rural/urban communities requires bespoke channels*	*Consolidation of rural communities allows for concentrated focus on specific community issues; size of rural / mixed urban unitary could make it challenging to maintain depth of local engagement*

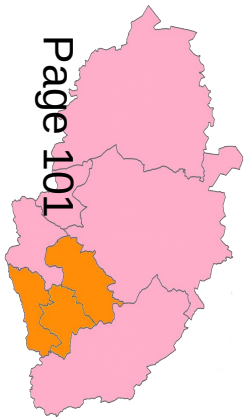
Note: RAG rating indicates how the option aligns to the MHCLG criteria relative to the other two options

Alignment to MHCLG criteria: H M L

Options Appraisal: Detailed analysis of Option 1(b)

This option demonstrates the strongest fit against the MHCLG criteria overall. Whilst constraints such as urban capacity and Green Belt review may impact future housing delivery, it combines authorities that are already the most alike in terms of rural / urban settings amongst all options and aligns with the City's demography and geography, offering a balanced distribution of service delivery, equal population and debt-to-reserve ratio.

1b Two Unitary Authorities: Nottinghamshire and Nottingham City + Broxtowe + Gedling



Alignment to MHCLG criteria

H M L

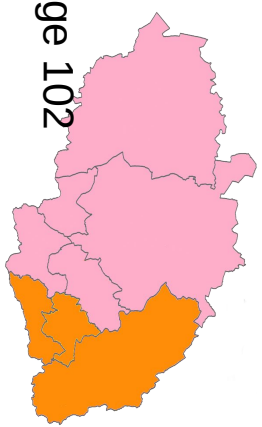
Criteria	Advantages and Disadvantages (Key: Footnote (Page))
Criteria 1	Presents a stronger alignment with the Sensible Economic Area criteria than Option 2 though is not an optimum fit as fragments both the travel to work and housing market areas in Nottingham; though only marginally more more than Option 1(e) (< 1 percent).[1] (22) Similarly, it presents a stronger alignment with the Sensible Geography criteria than Option 2, though less than Option 1(e).[2] (22) Whilst Option 1(b) has the lowest difference between the two authorities in the number of homes needed and available over next 15yrs,[2] (12) constraints such as urban capacity, Green Belt review and splitting of strategic growth areas would dominate and impact future growth options beyond current plan allocations, and may hinder long-term housing supply.[2] (20) Deprivation levels are relatively equal though the spread between authorities is wider in Option 1(b) than 1(e), with Nottingham City + Broxtowe + Gedling average deprivation score at 26.5, and the rest of Nottinghamshire's at 20.7.[9]
Criteria 2	Presents an equal population level though marginally less than Option 1(e), with Nottingham City + Broxtowe + Gedling projected to have 603,185 residents by 2035 and the rest of Nottinghamshire would have 661,460.[7] Additionally, financial resilience - key to criteria 2 - is likely to be met with this option, as Nottingham City + Broxtowe + Gedling debt-to-reserves ratio stands at 53.5, with the Nottinghamshire authority standing at 14.0.[8] Despite an imbalance in debt/reserves per capita, this option is only marginally less balanced than Option 1(e).
Criteria 3	Strongest fit with Criteria 3 given the similar demographics and geography between Broxtowe, Gedling and Nottingham City meaning minimal impact to service delivery given infrastructure, town centres, travel and crossover to facilitates. Ensures a balanced distribution of demand for SEND services, minimising impact on resources, workforce and caseload.[3] (8,11) Additionally, this option offers the most equitable share of Children's Social Care Expenditure (51% & 49% for the County and City authority respectively).[12] (8) It also has potential to deliver ASC services to areas with greater commonality of needs.[4] (9) Potential risks of Option 1(b) include potential fragmentation of homelessness services given confused pathways and weaker relationships between health and housing/homeless teams/services 10 (14) and possible impact on provider services due to asset relocation.[4] (10)
Criteria 4	This option presents the strongest alignment with criteria 4 when considering local identity. Looking at the types of areas that exist across the Nottingham and Nottinghamshire geography, Option 1(b) combines authorities that are already the most alike in terms of rural / urban settings of all three options (i.e. Urban Minor Conurbation and Rural Town/Fringe).[5] It also has the most similar clustering of demographics across both Unitary Authorities when considering mosaic characteristics, which are mainly Aspiring Homemakers, Senior Security, Rental Hubs, Domestic Success and Rental Hubs (non-exhaustive).[6] Given the similar grouping of rural and urban populations, this suggests that each authority could best tailor its services to the specific needs of its demographic.[5]
Criteria 5	This option presents a strong alignment with criteria 5. It supports effective governance arrangements with the two new Unitary Authorities and the EMCCA as the reorganisation will reduce complexity and bureaucracy. Additionally, this option meets the requirements for a sensible population size ratio (outlined above in Criteria 2), with the Nottingham City conurbation projected to have 603,185 residents by 2035 and the rest of Nottinghamshire to have 661,460.[7]
Criteria 6	There is some overlap with existing wider system provision and several cross-boundary community networks already operating across this geography, though there would be a need to consider if new channels / approaches will be required to strengthen engagement with communities. Gedling, Broxtowe and Nottingham residents also share similar urban characteristics, challenges, and infrastructure needs - enabling more targeted and aligned engagement approaches.[6]

1. Criteria Assessment: Sensible Economic Areas for LGR in Nottingham and Nottinghamshire
2. Criteria Assessment: Increasing Housing Supply and Meeting Local Needs in Nottingham and Nottinghamshire
3. Criteria Assessment: Children's SEND service in Nottingham and Nottinghamshire
4. Criteria Assessment: Adult Social Care services in Nottingham and Nottinghamshire
5. Comparative Analysis: Rural-Urban comparative analysis (Phase 1)
6. Comparative Analysis: Experian Mosaic segmentation analysis (Phase 1)
7. Comparative Analysis: Population (Phase 1)
8. Comparative Analysis: Debt to Reserve per capita Ratio Analysis (Phase 1)
9. Comparative Analysis: Deprivation (Phase 1)
10. Criteria Assessment: Homelessness in Nottingham and Nottinghamshire
11. Criteria Assessment: Public Safety in Nottingham and Nottinghamshire
12. Criteria Assessment in Children's Social Care in Nottingham and Nottinghamshire

Options Appraisal: Detailed analysis of Option 1(e)

This option demonstrates a strong fit against the MHCLG criteria with a marginally stronger fit with travel to work and housing market areas than Option 1(b). Whilst there is a balanced population split, similar deprivation levels, and similar levels financial resilience, the city-based conurbation authority would become predominantly rural with the least similar Mosaic characteristics, potentially needing different service delivery models and a potential imbalance in terms of demand.

1e Two Unitary Authorities: Nottinghamshire and Nottingham City + Broxtowe + Rushcliffe



Alignment to MHCLG criteria

H M L

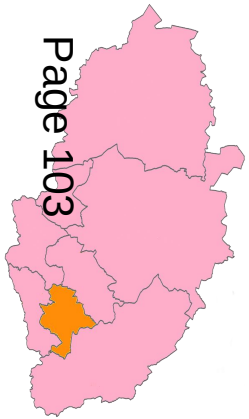
Criteria	Advantages and Disadvantages	Key: Footnote (Page)
Criteria 1	Stronger alignment with the Sensible Economic Area criteria, providing the strongest fit with travel to work areas, housing market areas and NHS hospital trust areas, though only marginally more than Option 1(b) (< 1 percent).[11 (23)] Similarly, it presents the strongest alignment with the Sensible Geography criteria overall,[2 (22)] despite having the greatest difference between the two authorities in the number of homes needed and available over next 15yrs.[2 (15)] This is due to existing collaborations on the Greater Nottingham Strategic Plan and the ability to release Nottingham Derby Green Belt land as Grey Belt to address the housing needed, producing two balanced planning authorities in size with wide mix of housing supply resources. Deprivation levels are relatively equal between the two authorities and is the option with the lowest difference, with Nottingham City + Broxtowe + Rushcliffe average deprivation score at 24.7, and the rest of Nottinghamshire's at 22.3.[9]	
Criteria 2	Presents an equal population level and is the option with the lowest difference between authorities, with the city authority projected to have 611,518 residents by 2035 and Nottinghamshire having 653,127.[7] Additionally, financial resilience- is likely to be met, as Nottingham City + Broxtowe + Rushcliffe debt-to-reserves ratio stands at 47.4, and the rest of Nottinghamshire's 17.5. Despite an imbalance in debt/reserves per capita, it is the option with the lowest difference between authorities.[8]	
Criteria 3	Demographics and geography differ in the city authority, with Rushcliffe being more similar to Bassetlaw and Newark with large rural areas and an older adult populations.[4 (17)] Whilst no noticeable service enhancement opportunities have been identified for ASC[4 (12)] or SEND, this option may help streamline homelessness services as rough sleepers have a local connection to Notts City.[10 (15)] For Children's Social Care, Option 1(e) would provide a fairer share of the tax base across the two new unitarties.[12 (9)] However, whilst the disaggregation of Rushcliffe from the county to city authority would have little impact in terms of demand (i.e. children in care), income would be significantly reduced for the county authority. The percentage point gap of 6% between the share of children's total expenditure is 3 times that of Option 1(b).[12 (9)] The key risk to service delivery is further exemplified through the loss of revenue for SEND service in Rushcliffe, as it has a lower rate of children with EHCPs or special provisions which would result in an imbalance between service demand and income needed.[3 (9)]	
Criteria 4	This option presents a medium alignment with criteria 4. Looking at the types of areas that exist across the Nottingham and Nottinghamshire geography, Option 1(e) combines authorities that are the most different in terms of rural / urban settings.[5] The city-based conurbation authority would become predominantly rural, whilst the county-based authority would remain predominantly rural.[1 (23)] Of all three options, it also has the least similar Mosaic characteristics across both authorities.[6] Given that Option 1(e) would combine authorities that are most different in terms of rural and urban populations, this suggests that each authority might not be able to tailor its services to the specific needs of its demographic in the same way that Option 1(b) could.	
Criteria 5	This option presents a strong alignment with criteria 5 as there is already an existing combined authority within the Nottingham City conurbation. Additionally, this option meets the requirements for a sensible population size ratio (outlined above in Criteria 2), with the Nottingham city conurbation projected to have 611,518 residents by 2035 and Nottinghamshire to have 653,127.[7]	
Criteria 6	Some overlap with existing wider system provision and several cross-boundary community networks already operating across this geography. The rural mix of rural and urban populations within the city-based authority would will present unique needs and therefore potentially new and bespoke channels will be required.	

1. Criteria Assessment: Sensible Economic Areas for LGR in Nottingham and Nottinghamshire
2. Criteria Assessment: Increasing Housing Supply and Meeting Local Needs in Nottingham and Nottinghamshire
3. Criteria Assessment: Children's SEND service in Nottingham and Nottinghamshire
4. Criteria Assessment: Adult Social Care services in Nottingham and Nottinghamshire
5. Comparative Analysis: Rural-Urban comparative analysis (Phase 1)
6. Comparative Analysis: Experian Mosaic segmentation analysis (Phase 1)
7. Comparative Analysis: Population (Phase 1)
8. Comparative Analysis: Debt to Reserve per capita Ratio Analysis (Phase 1)
9. Comparative Analysis: Deprivation (Phase 1)
10. Criteria Assessment: Homelessness in Nottingham and Nottinghamshire
11. Criteria Assessment: Public Safety in Nottingham and Nottinghamshire
12. Criteria Assessment in Children's Social Care in Nottingham and Nottinghamshire

Options Appraisal: Detailed analysis of Option 2

This option demonstrates the weakest alignment against the MHCLG criteria. It would create councils with the greatest degree of fragmentation of travel to work, hospital and housing market areas and a significant population imbalance. It would also confine the City to existing boundaries rather than creating the conditions for growth.

2 Two Unitary Authorities: Nottinghamshire and Nottingham City



Alignment to MHCLG criteria

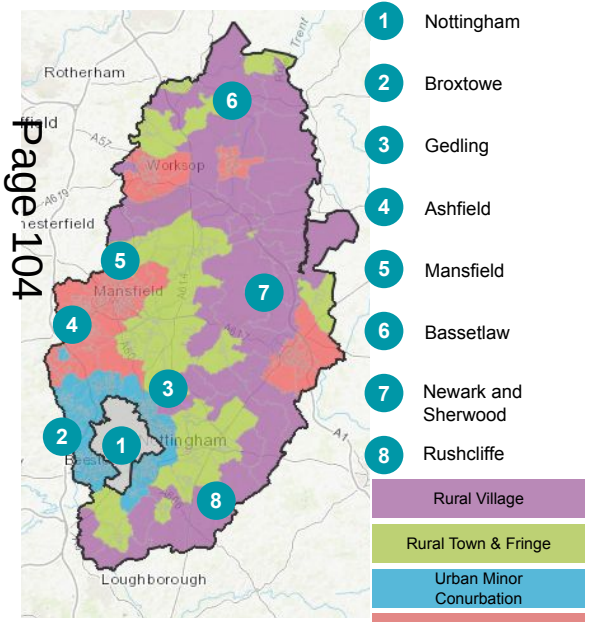
H M L

Criteria	Advantages and Disadvantages	Key: Footnote (Page)
Criteria 1	This option presents the weakest alignment with the Sensible Economic Area criteria of all three options, providing the lowest degree of economic self-containment 1 (10) and the greatest fragmentation of travel to work areas, NHS hospital trust areas and the Inner Nottingham housing market areas.[1] (6, 15, 13) Similarly, it presents the weakest alignment with the Sensible Geography criteria, as the ability to increase housing supply is limited by restrictions on available land for housing in Nottingham City.[2] (17) Whilst present supply figures look strong, housing supply may not be able to be increased in the long-term due to reduction in sources of supply over time (e.g. absence of Green Belt land).[2] (19) Nottinghamshire + Remaining LAs have a significant shortfall and requires the highest number of houses to be identified across a large authority; a challenge not faced by the other options.[2] (18) The contrast in deprivation levels are the highest amongst all options, with Nottingham City's average deprivation score at 34.9, significantly higher than Nottinghamshire's 19.[9]	
Criteria 2	This has the weakest alignment with criteria 2, as it presents a significant population imbalance and the highest difference amongst all options, with Nottingham City projected to have 352,463 residents by 2035, fewer than Nottinghamshire's 912,182.[7] Additionally, financial resilience - key to the criteria 2 - is a concern, as Nottingham City's debt-to-reserves ratio stands at 83.9, exceeding Nottinghamshire's 16.5.[8] This imbalance increases financial vulnerability when compared to Option 1(b) and Option 1(e), and has the highest difference amongst all options.[8]	
Criteria 3	Option 2 does not meet criteria 3, as it establishes unitaries with heightened viability issues and service imbalances.[3] (11)There is a high social care cost imbalance in this option as the projected social care-to-council tax spending ratio is 1.12 for Nottingham City and 0.83 for Nottinghamshire.[4] (15) This would cause financial strain due to high care demands paired with a limited tax base. While this option presents a greater GP availability, it is not enough to outweigh its structural weakness.[4] (15)	
Criteria 4	Option 2 presents a medium alignment with criteria 4. Looking at the types of areas that exist across the Nottingham and Nottinghamshire geography, Option 1(b) combines combines authorities that are already the most alike in terms of rural / urban settings of all three options.[5] Arguably, Option 2 would less likely to satisfy the requirement as it may leave communities that do identify with the city in a different geography.	
Criteria 5	This option presents the weakest alignment with criteria 5. Whilst it may support effective governance arrangements between the two new Unitary Authorities and the EMCCA as the reorganisation will reduce complexity and bureaucracy, it does not meet the requirements for a sensible population size ratio, with Nottingham City projected to have 352,463 residents by 2035 and Nottinghamshire to have 912,182.[7] This would not meet the threshold for a population of 500,000 or more.[7]	
Criteria 6	Community engagement and neighbourhood empowerment will need to be supported. This option retains the need for continuous, strong, coordination between the City and County authorities for any major incidents that affects both areas. It may not fully capitalise on the benefits of aggregation that a single larger authority could offer for truly region-wide threats.[11] (Pg.24)The sheer size of the rural/mixed urban-rural unitary could make it challenging to maintain the depth of local engagement and partnership.[5]	

1. Assessment: Sensible Economic Areas for LGR in Nottingham and Nottinghamshire
2. Assessment: Increasing Housing Supply and Meeting Local Needs in Nottingham and Nottinghamshire
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5. Comparative Analysis: Rural-Urban comparative analysis (Phase 1)
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7. Comparative Analysis: Population (Phase 1)
8. Comparative Analysis: Debt to Reserve per capita Ratio Analysis (Phase 1)
9. Comparative Analysis: Deprivation (Phase 1)
10. Assessment: Homelessness in Nottingham and Nottinghamshire
11. Assessment: Public Safety in Nottingham and Nottinghamshire
12. Assessment in Children's Social Care in Nottingham and Nottinghamshire

Analysis: Rural-Urban comparative analysis of 11 core cities in the UK

The table below shows the percentage distribution between rural and urban areas within the UK's eleven core cities. Option 1(b) most closely aligns with the average city demographic offering an urban density of 96.1% against the UK average of 98.41%, which is greater Option 1(e) (87.6%).



Average proportion of rural population
[Department for Rural Affairs - Rural Urban Classification Map - Nottingham Observatory]

11 core cities	Rural %	Urban %
Bristol	0%	100%
Liverpool	0%	100%
Manchester	0%	100%
Nottingham (currently)	0%	100%
Birmingham	0.10%	99.90%
Glasgow [1]	0.40%	99.60%
Belfast [2]	0.43%	99.57%
Newcastle	2%	98%
Cardiff [3]	3%	97%
Sheffield	4.10%	95.90%
Leeds	7.50%	92.50%

The primary focus is a comparison of the percentage of rural and urban areas within each city, highlighting the predominance of urban regions. A key observation is that Option 1(b) is more aligned with demographic characteristics of a typical UK city, with an urban density of 96.1%, whilst Option (1e) would have the least urban density of all UK cities at 87.6%.

Option	Rural %	Urban %	Difference between %'s
Option 1(b)			
Nottingham City + Broxtowe + Gedling	3.9%	96.1%	34.4%
Nottinghamshire + Remaining LAs	38.3%	61.7%	
Option 1(e)			
Nottingham City + Broxtowe + Rushcliffe	12.4%	87.6%	18.3%
Nottinghamshire + Remaining LAs	30.7%	69.3%	

Source: [1] Rural Urban Classification 2011 lookup tables for local authority areas; [2] Scottish Government Urban Rural Classification 2022; [3] Belfast Local Development Plan 2023; [4] Wales Government website

5a. *Sensible Economic Area*

MHCLG Criteria Analysis: Sensible Economic Area (1/4)

Additional analysis completed by the nine councils assessed how the three options contribute to the MHCLG criteria 1a in creating a sensible economic area. There is no HMG definition of sensible economic area for local government meaning analysis has considered 'functional economic area' criteria.

Context

MHCLG officially set out their formal criteria for LGR proposals in February 2025, with criteria 1a requiring proposals to consider what would be a sensible economic area.

There is no established definition of a 'sensible economic area' for local government, though such an area should consider alignment of political and administrative structures with the actual economic behaviours and interactions of residents as far as is possible. A 'functional economic area' can act as a proxy for 'sensible economic area; using a range of factors such as TTWAs.

Sensible Economic Area: *Aligning political and administrative structures with how people live, work and travel*

Key considerations for sensible economic areas within Nottingham and Nottinghamshire:

- In Nottingham and Nottinghamshire, Functional Economic Market Areas (FEMA) were defined in a May 2021 report which analysed whether the Nottingham Inner and Outer HMAs could be considered FEMAs. It concluded that the five 'Core HMAs form a self-contained FEMA' and that 'an argument can be made that the Outer HMA is also a self-contained FEMA.'
- The 'kickstarting growth' mission aims to enhance living standards, supported by authorities putting in place policies across a sensible economic area.[2] Profiling conducted by the Office of National Statistics highlighted the economic challenges in Nottingham and Nottinghamshire, emphasising the need for administrative boundaries that better align with sensible economic areas.
- The evaluation of boundaries has focussed on long-term alignment with the functional economy (50 year horizon), prioritising fit with economic function over alignment with short-term policy, whether local, regional or national.
- Reflecting the overall economy of Nottingham and Nottinghamshire, all six authorities proposed under the 3 options would have higher than UK average inactivity rates, lower than average levels of enterprise formation, GDHI and productivity (GVA per head) – indicating the importance of sensible economic areas for local government to support long term prosperity of citizens and sustainability of local government in Nottingham and Nottinghamshire.

Criteria	Sub-criteria used in the officer assessment	1b	1e	2
1a Sensible economic area	*Travel to work areas*	Medium	High	Low
	Economic self containment	Medium	High	Low
	Housing market area	Medium	High	Low
	Service market for consumers (NHS Hospital Trusts)	Medium	High	Low

Note: RAG rating indicates how the option aligns to the MHCLG criteria relative to the other two options

Sources:
[1] Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study
[2] Kickstarting Economic Growth

MHCLG Criteria Analysis: Sensible Economic Area (2/4)

Whilst none of the options provide a 'perfect fit' against Travel to Work Areas (TTWAs), Option 2 provides the least coherence with TTWAs whilst Options 1b and 1e would most strongly represent a 'sensible economic area' given the lower levels of fragmentation.

Sensible Economic Area: *Aligning political and administrative structures with how people live, work and travel*

I. ***Travel to Work Areas[1]:*** Alignment with Travel to Work Areas (TTWAs) can be used as a key determinant of a functional economic area; covering self-contained labour markets that reflect areas where people live, work and commute. Nottingham and Nottinghamshire authorities fall predominantly within the Greater Nottingham, Worksop & Retford and Mansfield TTWAs, which also incorporate areas outside of the county (See Figure 1). Assessing the percentage of each TTWA population that resides in each current authority, Option 2 provides the least coherence with current TTWAs, whilst Option 1e marginally provides the strongest fit with the Nottingham TTWA for the Nottingham City conurbation and with the County based TTWAs for the Nottinghamshire authority. This is due to approx 8,600 Gedling authority residents that work in the Mansfield TTWA who would be living and working in the same authority under this option. However, assessment of the three options against TTWAs alone is insufficient given none provide a 'perfect fit', though though further analysis informs the degree of fit from fragmentation levels.

Option 2 would result in the greatest fragmentation of all options; particularly for the residents of Broxtowe, Gedling and Rushcliffe absorbed into the Nottinghamshire authority. This is evidenced through assessment of the overall patterns of travel between authorities, which shows that the first choice work destination for residents from these authorities (and Nottingham) is Nottingham. Further evidence of fragemention within Option 2 is evidenced by the number of residents that commute to work from outside their home authority versus those that work and work within the same authority, with Broxtowe, Gedling and Rushcliffe authorities having the lowest percentage of residents that work work within the new Nottinghamshire unitary authority. This suggests that Option 2 does not represent a sensible economic area given the level of fragmentation.

Options 1b and 1e would provide the lowest degree of fragmentation when compared to Option 2. Option 1b presents a significant degree of fragmentation for Rushcliffe residents whilst Option 1e presents a significant degree of fragmentation for Gedling, leaving more residents working outside their home authority than in within it. Whilst the degree of fragmentation is slightly more significant for Gedling residents in Option 1e versus Rushcliffe residents in Option 1b, either option could represent a sensible economic area given the low levels of fragmentation across all authorities.

Figure 1: ***Nottinghamshire & Derbyshire Travel to Work Areas (TTWAs)***

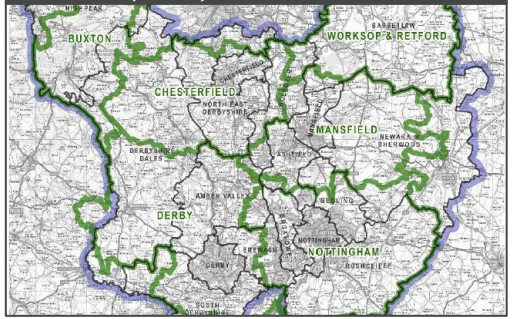
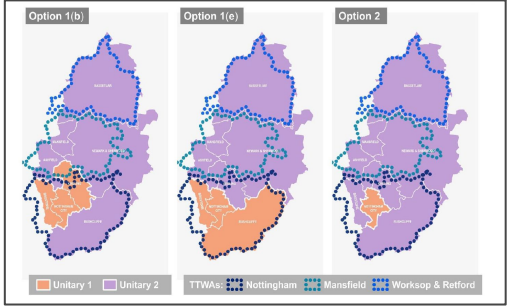


Figure 2: ***Submitted Options and Travel to Work Areas (TTWAs)***



MHCLG Criteria Analysis: Sensible Economic Area (3/4)

Options 1a and 1b have the highest degree of economic self-containment and most strongly align with Housing Market Areas and NHS Hospital Trust Area boundaries; whilst the degree of difference is marginal, Option 1e would more strongly represent a 'sensible economic area'

Sensible Economic Area: *Aligning political and administrative structures with how people live, work and travel*

I. ***Economic self containment:*** The overall percentage of workers living within each new authority that also work within that authority can be used to indicate the degree of economic 'self-containment', with a higher percentage indicating a greater self-containment. Options 1b and 1e are comparable, exhibiting a medium-degree of self-containment across both the Nottingham City conurbation (71.3% and 71.1% respectively) and Nottinghamshire (60% and 61% respectively). Option 2 exhibits the lowest-degree of self-containment across all options at 64% for Nottingham City and 58% for Nottinghamshire.

II. ***Housing market area:*** Alignment with local Housing Market Areas (HMA) can be used as a key determinant of a functional economic area (see Figure 1); covering 'whole council' areas and linking places where people live, work and move home. Nottingham and Nottinghamshire authorities fall predominantly within the Nottingham Inner, Outer and Northern (Sheffield and Rotherham) HMAs, with the majority falling within the Nottingham Inner / Core. None of the proposed options align perfectly with the HMAs in Nottingham and Nottinghamshire, though Option 2 would provide the greatest fragmentation of the Nottingham Inner HMA and the residents of Broxtowe, Gedling and Rushcliffe. Options 1b and 1e provide the strongest alignment to the Nottingham Inner HMA, though would fragment the residents of Rushcliffe and Gedling respectively and equally. Further analysis of each HMA population that would reside in each of the proposed new authorities indicates that Option 1e would marginally provide a better fit with the HMA geographies than Option 1b, though only by ~0.5 per cent (70.89 vs 70.41 percent).

III. ***Service market for consumers:*** Alignment with existing health service structures can be used as a key determinant of a functional economic area (see Figure 2). Option 1e suggests the strongest alignment between proposed authority boundaries and existing NHS Hospital Trust Area boundaries, including the Nottingham University Hospitals for the Nottingham City conurbation and Sherwood Forest Hospitals and Doncaster & Bassetlaw Teaching Hospitals for for Nottinghamshire. This is supported by analysis of Middle Super Output Areas (MSOAs) where more than 50% of patients attended an NHS Trust Hospital, which indicates there is significant alignment between NHS Hospital Trust Area boundaries, Travel to Work Areas and Housing Market Area geographies.

Figure 1: ***Submitted Options and Housing Market Areas (HMAs)***

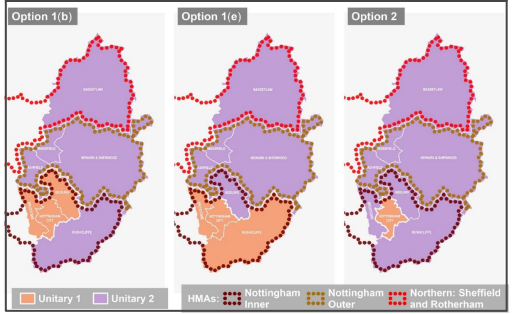
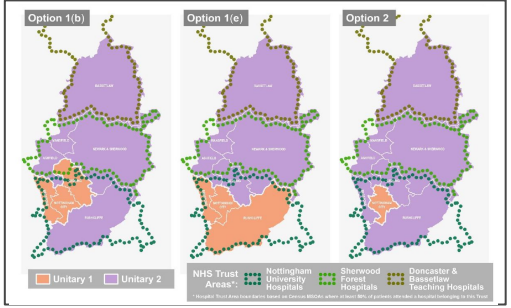


Figure 2: ***Submitted Options and NHS Hospital Trust Areas***



MHCLG Criteria Analysis: Sensible Economic Area (4/4)

Additional analysis suggests that Option 2 represents the least sensible economic are and whilst neither Option 1(b) or (e) represent an optimal fit as they both fragment travel to work and housing market areas, Option 1(e) marginally (< 1 percent) provides a stronger fit with TTWA and HMA's

Sub-criteria	1b Nottinghamshire and Nottingham City + Broxtowe + Gedling	1e Nottinghamshire and Nottingham City + Broxtowe + Rushcliffe	2 Nottinghamshire and Nottingham City
Travel to work areas (TTWAs)	Fragments the Nottingham TTWA for Rushcliffe residents (-3.50) to a lesser degree than Option 1(e) would for Gedling residents (-15.1). However, has a lower share of Nottingham TTWA population (65.2%) than Option 1e would (66.7%)	Fragments the Nottingham TTWA for Gedling residents (-15.1), more than Option 1(b) does for Rushcliffe residents (-3.50). However, has a higher share of the Nottingham TTWA population (66.7%) than Option 1b would (65.2%)	Least coherence with the Nottingham TTWA, particularly for Broxtowe (3.9), Gedling (2.7) and Rushcliffe residents (9.30). The Nottingham City authority would have the lowest share of the Nottingham TTWA population of all options (38%)
Economic self containment	Greater levels of economic self-containment than Option 2 for both the Nottingham City conurbation Authority (71.3%) and Nottinghamshire (60%) though differences are marginal to Option 1(e).	Greater levels of economic self-containment than Option 2 for both the Nottingham City conurbation Authority (71.1%) and Nottinghamshire (61%) though only marginally better than Option 1(b).	Lowest degree of economic self-containment for both the Nottinghamshire (58%) and Nottingham City (64%) authorities of any of the three options.
Housing market area (HMA)	High proportion of the population within the existing Nottingham Inner HMA would reside in the Nottingham City Authority (70.41%), suggesting a strong fit with HMA geographies. This however is marginally less than 1(e) (70.89%).	High proportion of the population within the existing Nottingham Inner HMA would reside in the Nottingham City Authority (70.89%), suggesting the strongest fit with HMA geographies. This is marginally more than 1(e) (70.41%).	Provides the greatest fragmentation of the Nottingham Inner HMA and the residents of Broxtowe, Gedling and Rushcliffe
Service market for consumers	Medium alignment between authority boundaries and existing NHS Hospital Trust boundaries, with the Nottingham City conurbation covered by Nottingham Uni. and Sherwood Forest Hospitals.	Strongest alignment between authority boundaries and existing NHS Hospital Trust boundaries, with the majority of the Nottingham City conurbation covered by Nottingham Uni. Hospitals.	Lowest alignment, with Nottinghamshire covered by three NHS Hospital Trust Areas including Nottingham Uni. Sherwood Forest and Doncaster & Bassetlaw Teaching Hospitals.
Summary	Provides a lesser degree of fragmentation when compared to Option 2 hence representing more of a sensible economic area, though the degree of fragmentation is slightly more than Option 1(e)	As with Option 1(b), represents significantly more of a sensible economic area than Option 2, with the degree of fragmentation being slightly less than Option 1(b), though this is marginal when assessed against all criteria.	Provides the lowest degree of economic self-containment for both authorities and greatest fragemention of travel to work, Housing Market and NHS Hospital Trust area(s), representing the least sensible economic area

Note: RAG rating indicates how the option aligns to the MHCLG criteria relative to the other two options

5b. *Sensible Geography*

MHCLG Criteria Analysis: Sensible Geography (1/4)

Additional analysis completed by the nine councils assessed how the three options contribute to the MHCLG criteria 1b in helping to increase housing supply and meet local need.

Context

MHCLG officially set out their formal criteria for LGR proposals in February 2025, with criteria 1b requiring proposals to be for a sensible geography.

The assessment assumes that reference to "meeting local need" refers to how well options fare in meeting local housing needs; particularly in respect of affordable housing solutions for those unable to access market housing for sale or rent, for gypsy, Roma and traveller groups and those with specialist housing needs.

Deleted: the

Sensible Geography: *Increasing housing supply and meeting local needs…*

Key considerations for planning and housing within Nottingham and Nottinghamshire:

- There are existing Local Planning Authorities (LPAs) that have worked together to determine Housing Market Areas and address strategic housing needs for Nottingham and Nottinghamshire authorities; LPAs have worked within these groups for several years and have strong working relationship levels with shared strategic planning evidence based and common strategic planning policies.
- The spatial overview of Nottingham and Nottinghamshire together with the evidence led work undertaken on differing housing and economic market areas both point to a difference between the north and south of Nottinghamshire which suggests that in order to plan effectively for housing, future unitary authorities in Nottinghamshire should be organised to reflect these different characteristics.
- Collectively across Nottingham and Nottinghamshire as a whole, there appears to be sufficient sources of supply to meet future requirements; though both Ashfield and Broxtowe are currently required to prepare and implement an action plan designed to raise the level of housing delivery in their respective district as delivery is not meeting required.
- By the time new unitary authorities are created, the landscape of planning for housing will change as the East Midlands Combined Authority (EMCCA) will be given powers related to planning for future housing supply as part of Spatial Development Strategies (SDS)

Assessment of prioritised options against four factors:

Criteria	Sub-criteria used in the officer assessment	1b	1e	2
1b Sensible geographic breakdown	*Impact on potential to increase long term housing supply*	Medium	Medium	Low
	Impact on transition to system of a Spatial Development Strategy & Local Plans	Medium	High	Low
	Impact on meeting local housing needs	High	High	Low
	Impact on other issues such as mineral and waste planning	High	High	High

Note: RAG rating indicates how the option aligns to the MHCLG criteria relative to the other two options

MHCLG Criteria Analysis: Sensible Geography (2/4)

Updated analysis has assessed long-term issues around housing delivery through assessment of the 2024 published housing need figure for each authority over a 15-year period. This has been compared to current identified supply as set out in the latest published housing supply documents from each authority.

Sensible Geography: *Increasing housing supply and meeting local needs…*

I. ***Impact on potential to increase long term housing and meet local needs***: Option 1e sees the greatest difference in the number of homes needed and available over the next 15 years. Whilst Nottingham City, Broxtowe and Rushcliffe have significant sources of housing supply to meet local housing needs estimates with little need to allocate further strategic housing land at present, Nottinghamshire and the remaining council areas have a sizeable housing need to meet. The analysis notes however that there are significant opportunities to allocate further land to address this housing need in areas outside the Nottingham-Derby Green Belt, though this is dependent on a future Spatial Development Strategy.

The housing need per capita analysis from Phase 1 measured the demand for new homes by comparing forecasted housing requirements to the population,

Option		Population (current)	Forecast new homes (2022-2027)	Forecast new homes needed per 1000 people (2022-2027)
1b	Nottingham City + Broxtowe + Gedling	561,011	11,000	19.6
	Nottinghamshire + Remaining LAs	612,759	10,510	17.2
1e	Nottingham City + Broxtowe + Rushcliffe	566,302	11,625	20.5
	Nottinghamshire + Remaining LAs	607,468	9,885	16.3
2	Nottingham City*	329,276	6,565	19.9
	Nottinghamshire	844,494	14,945	17.7

Updated analysis prepared by Heads of Planning has assessed the combined effect of housing needs and supply across the three options

Option		15 year local housing need (dw/pa)	Known housing supply over next 15y (dw)	Difference between need and supply
1b	Nottingham City + Broxtowe + Gedling	38,430	43,700	+5,270
	Nottinghamshire + Remaining LAs	47,845	43,790	+4,055
1e	Nottingham City + Broxtowe + Rushcliffe	41,905	50,600	+8,695
	Nottinghamshire + Remaining LAs	44,370	36,890	-7,480
2	Nottingham City*	19,305	26,700	+7,395
	Nottinghamshire	66,970	59,035	-7,935

Key: Options with lowest difference … Options with highest difference

MHCLG Criteria Analysis: Sensible Geography (3/4)

Assessment of prioritised options against the criteria considered how options would align with the Greater Nottingham Strategic Plan, the Trent Arc Cluster and available geography to allocate development without significant compromise to the existing (current) Green Belt policies. This could of course change as regional and national spatial planning policy is amended.

Sensible Geography: *Increasing housing supply and meeting local needs…*

I. ***Impact on potential to increase long-term housing and meet local needs (con't):*** Option 1b sees the smallest difference in housing need and supply, with Nottingham City, Broxtowe and Gedling able to meet housing supply without significant reliance on greenfield land. The success of this approach however is dependent on (a) continued development of brownfield sites in Nottingham City and (b) amendment of the Green Belt boundary within Gedling and Broxtowe to accommodate housing growth on less valuable Green Belt land. Nottinghamshire and remaining council areas cover such a large geography the identification of further sites would not be problematic. The ability to increase housing supply in Option 2 is limited by restrictions on available land for housing in Nottingham City, and whilst present supply figures look strong, housing supply may not be able to be increased in the long-term due to reduction in sources of supply over time. Nottinghamshire remaining council areas have a significant shortfall and require the highest number of houses to be identified.

II. ***Impact on transition to system of a Spatial Development Strategy & Local Plans:*** Alignment with the current Greater Nottingham Strategic Plan (GNSP) and minimising the separation of strategic growth locations between authorities were noted as key considerations for this criteria. In particular, grouping authorities which have major proposals for "Trent Arc" was specifically noted as strategically important. Option 1b would see several new development sites for the wider Nottingham area be split between the two authorities; necessitating the need for collaboration on existing growth locations and potentially slowing development of Local Plans and acceleration of housing supply. By contrast, Option 1e reflects existing joint planning efforts evidenced through development of the GNSP, and would provide a solid foundation for conversion into a new Unitary Local Plan through alignment with the evolving Regional Spatial Development Strategy and Mayoral Spatial Development Strategy. Option 1e would however require both councils to develop a shared vision for the northeastern part of the built-up area of Nottingham, which to date has formed a functional housing and economic market area for the purposes of strategic planning. Whilst Option 2 would require no changes to the Nottingham City authority and allow it to continue pursuing urban regeneration projects and focus on its own needs, greater demands would be placed on the Regional Spatial Development Strategy with sufficient guidance to ensure a clear growth strategy for Nottingham as a conurbation beyond the boundaries of the city. This presents a unique challenge if Nottinghamshire Authority wishes to purse a different development strategy; one which the other options do not need to resolve.

III. ***Impact on meeting Local Housing Needs:*** Existing collaborations formed to assess housing needs as part of the GNSP were noted as a key consideration for this criteria, as evidenced in Options 1b and 1e. Both options offer a shared strategy for increasing affordable housing on development sites through the release of land in the Nottingham Derby Green Belt as Grey Belt and provide a wide geography for the other Unitary Authority to accommodate the specific housing needs of its area. By contrast, Option 2 does not afford Nottingham City the same opportunity to meet its specific housing needs given the absence of a Green Belt and need to work with a surrounding larger authority. Whilst the size of Nottinghamshire would provide more opportunities to meet its housing needs, addressing the specific needs in localities across the region might be an ongoing challenge.

IV. ***Impact on other issues such as mineral and waste planning:*** Specialist knowledge and experience exists within the present Nottinghamshire County Council and needs to be retained. Option 1b and 1e would allow staff to be retained from the present County mineral and waste planning service; hosted by one of the two Unitary Authorities and provided as a commissioning service to the other Unitary Authority. This approach aims to preserve expertise and ensure consistent policy advice and application processing across both Unitary Authority. Option 2 would see the Nottinghamshire County Council service absorbed into the Nottinghamshire Unitary Authority without changing existing arrangements with Nottingham City (e.g. preparation of a joint waste Local Plan). All options present minimal impacts.

MHCLG Criteria Analysis: Sensible Geography (4/4)

Considering the above assessment of planning in Nottingham and Nottinghamshire and the three options under consideration as to the appropriate geography to assist in increasing housing supply, Option 1e would best meet the MHCLG Criteria 1(b)

Sub-criteria	1b Nottinghamshire and Nottingham City + Broxtowe + Gedling	1e Nottinghamshire and Nottingham City + Broxtowe + Rushcliffe	2 Nottinghamshire and Nottingham City
Impact on potential to increase long term housing supply	*The least difference in number of homes needed and available over next 15yrs between the two authorities; excess of +5,270 in Nottingham conurbation and +4,055 in Nottinghamshire, though almost entirely dependent on Green Belt policies*	*The greatest difference in number of homes needed and available over next 15yrs between the two authorities; Nottinghamshire authority having sizeable housing need to meet (gap of -7,480) versus the Nottingham conurbation (excess of +8,695)*	*Ability to increase housing supply is limited by restrictions on available land in Nottingham City; supply figures look strong however difficult to increase in long-term due to reduction in sources of supply. Nottinghamshire has significant shortfall.*
Impact on transition to system of a Spatial Development Strategy & Local Plans	*Several new development sites for the wider Nottingham area would be split between the two UAs; necessitating the need for collaboration on existing growth locations and potentially slowing development of Local Plans and acceleration of housing supply.*	*By contrast, Option 1(e) reflects existing joint planning efforts through GNSP, and provides a solid foundation for conversion into a new Unitary Local Plan through alignment with the evolving Development Strategies; would require a joint vision for NE part of Nottingham*	*Option 2 would allow Nottingham City to continue pursuing urban regeneration projects, though greater guidance needed by Regional Development Strategy to ensure a clear growth strategy for Nottingham City conurbation; a challenge not faced by other options*
Impact on meeting local housing needs	*Nottingham City conurbation to increase affordable housing through the release of Nottingham Derby Green Belt land as Grey Belt; though quantum of this is uncertain. Nottinghamshire would have a wide geography to accommodate needs of its area.*	*As with Option 1b, Nottingham City conurbation to release Nottingham Derby Green Belt land as Grey Belt; though the quantum of this is uncertain. Nottinghamshire would have a wide geography to accommodation needs of its area.*	*Unlike Options 1(b) and 1(e), Nottingham City restricted in the long-term given absence of Green Belt land. Nottinghamshire to have more opportunities though required to meet specific needs across a large authority; a challenge not faced by the other options.*
Impact on other issues such as mineral and waste planning	*Staff retained from the present County mineral and waste planning service; hosted by one of the two UAs and provided as a commissioning service to the other UA*	*Staff retained from the present County mineral and waste planning service; hosted by one of the two UAs and provided as a commissioning service to the other UA*	*Nottinghamshire County Council service absorbed into the Nottinghamshire UA without changing existing arrangements with Nottingham City (e.g. preparation of a joint waste Local Plan).*
Summary	Constraints such as urban capacity, Green Belt review and splitting of strategic growth areas would dominate and impact future growth options beyond current plan allocations, and may hinder long-term housing supply.	Councils already collaborating on GNSP and can utilise urban capacity of Nottingham City with opportunity for Greenfield release, producing two balance planning authorities in size with wide mix of housing supply resources	Initial urban capacity will eventually be utilised and long-term housing growth for Nottingham would need to be accommodate in Nottinghamshire, which may hinder accelerated housing growth in the whole area

Note: RAG rating indicates how the option aligns to the MHCLG criteria relative to the other two options

5c. *Crucial Services*

MHCLG Criteria Analysis: Crucial Services

Additional analysis of the three options has been prepared by officers across all councils to assess how options meet MHCLG criteria 3 to improve service delivery or mitigate negative impact on crucial services.

Context

MHCLG officially set out their formal criteria for LGR proposals in February 2025, with criteria 3 requiring proposals to be to improve delivery of, or mitigate risks to negative impact on crucial services.

There is likely to be national funding changes given the current Fair Funding consultation however, this options analysis has taken place in the context of knowledge of current and forecast demand and funding. Potential wider national and regional policy changes have not been able to be factored in at this stage.

Impact on crucial services: *Improves service delivery or mitigates negative impact on crucial services*

Key considerations for Crucial services within Nottingham and Nottinghamshire:

- Addressing homelessness requires coordinated efforts across public services like health, social care, and probation. Preparation for local government reorganisation is essential to align financial resources and services with community needs. Each authority in Nottingham and Nottinghamshire has strategies for homelessness, it is important to align on strategies and priorities for improved outcomes.
- Around 13,000 people receive long-term support, with increasing needs and cost driven by factors like post-covid effects and government policies. Safeguarding concerns have risen, particularly financial abuse, linked to deprivation. The city faces high levels of deprivation and disability, impacting life expectancy and demand for support. Efforts are underway to digitise social care and develop shared care records. The net budget for social care is influenced by self-funders depleting assets, particularly in more deprived areas. Future legislation, such as NHS reforms and Mental Health Act changes, will affect service delivery and funding.
- Balancing the distribution of SEND services to meet regional demands and prevent disparities in resource allocation is key. Potential reforms impacting social care, homelessness, and SEND services must also be addressed. Managing high-demand and costly SEND provisions is challenging due to inadequate statutory funding. It is crucial for councils to collaborate during transitions, handle funding deficits, and prepare for national SEND reforms to ensure effective service delivery in the proposed unitary structure.
- The proposed reforms and future legislations under Children's Social Care offer a once in a lifetime opportunity to transform the systems and improve outcomes for children and families.

Initial assessment of prioritised options against four factors:

Criteria	Sub-criteria used in the officer assessment	1b	1e	2
3b Improves delivery of, or mitigates risk to negative impact on crucial services	*Data analysis and comparison of the different unitary arrangements*	High	Medium	Low
	The opportunities presented by the different unitary arrangements	Low	Low	Medium
	The risk presented by the different unitary arrangements	Medium	Low	High*
	Impact on delivery e.g. staffing considerations, geography	Medium	Medium	Medium

Note: * This indicates that Option 2 provides a low risk to the different unitary arrangements

Note: RAG rating indicates how the option aligns to the MHCLG criteria relative to the other two options

MHCLG Criteria Analysis: Crucial Services (Adult Social Care 1/3)

Based on an assessment of the options using relevant data shows that the differences between Option 1(b) and Option 1(e) are marginal. Option 2 has greater variance and has higher rates across most metrics.

Crucial Services: *Improves service delivery or mitigates negative impact on Adult Social Care*

I. ***Data Analysis and comparison of the different unitary arrangements:***

1(b): Under population there is a fairly even split, with a slightly higher count in the county. Council tax contribution is higher from the county (57%), yet they receive only 42% of the grant funding, indicating an imbalance. City + Broxtowe + Gedling get a larger proportion of the grant funding (58%) despite contributing less in council tax, potentially because of higher needs or deprivation indicators. Additionally, expenditure on adults is fairly balanced between the two proposed authorities, suggesting equitable service responsibilities. The social care to council tax ratio is relatively equitable at 0.94 for City + Broxtowe + Gedling and 0.97 for the rest of the area. The GP patient per practice is more evenly distributed than other options. For the unitary covering City + Broxtowe + Gedling the number of requests are marginally less than the rest of the County. A similar trend can be seen in number of people receiving long-term support. However, under health distribution the % of households in highest 2 deciles is an average of 40.6% for City + Broxtowe + Gedling in comparison to the rest of the county which is at an average of 17.6%. This option demonstrates a balanced distribution of care and service responsibilities and ensures no single unitary authority faces disproportionate strain. It also supports the case for equitable, sustainable service delivery across both authorities.

1(e): Under population both unitaries areas would serve relatively similar sized populations, ensuring no single authority is disproportionately burdened. City + Broxtowe + Rushcliffe generate less council tax (46%) but receive greater grant funding 56%. The rest of the county generates more local revenue but receives less external support, which is typically more affluent areas. Expenditure on Adults' services a higher cost can be seen in the rest of the county (53% vs 47%). This proposed split avoids creating a significant imbalance in service demand and costs. The social cost rations are City + Broxtowe + Rushcliffe is 0.87 whereas the rest of the County is 0.92, lower ratios indicate more cost-effective service delivery relative to council tax base. The GP patients per practice split is also relatively similar ensuring less pressure on the infrastructure of City + Broxtowe + Rushcliffe. The unitary covering City + Broxtowe + Rushcliffe has a greater number of new requests in comparison to the rest of the county. The same trend can be seen for people receiving long-term support. The health distribution split is greater under this option than 1b. The % of households in the lowest decline is 71.4% and % of households in the highest two deciles is at 40.6% for City + Broxtowe + Rushcliffe. It is at 27.14% amd 7.62% respectively for the rest of the county.

Option 2: Nottingham City accounts for only 22% of the council tax base despite comprising about 28% of the population. The city receives 43% of the grant funding and there is greater reliance on central funding in the City making it more financial vulnerable. For Adult Social Care the county bears 74% of the costs and the City only 26%. Under projected spending pressure the city spending-to-tax ratio is 1.12 which means that the spending on social care would exceed council tax income by 12%. Whereas for the county the ratio is 0.8 which means the spending is less than income tax. The city would be financially overstrained, with high care needs but a limited tax base. Splitting the city from the rest of the county may disrupt integrated services such as social care and health. It fails the crucial services test as it makes it harder to deliver and coordinate key services. This option indicates a greater GP availability but this is't enough to outweigh the structural weakness of option 2. Under this option the split for new requests, people receiving long-term support and health distribution is greater than that seen in both Option 1(b) and 1(e).

MHCLG Criteria Analysis: Crucial Services (Adult Social Care 2/3)

Assessment of the options against the other sub-criteria are set out below including the risks presented by the different unitary arrangements and the impact on delivery. Though Option 1(b) and 1(e) have slight variations, 1(b) is preferable due to geographical and demographic factors.

Crucial Services: I*mproves service delivery or mitigates negative impact on Adult Social Care*

II. ***The opportunities presented by the different unitary arrangements:*** Under Option 1(b) the two unitaties would be providing services to areas with greater commonality of needs - predominantly urban, in the city-based unitary of NBG, and to towns and villages, in the county. Option 2 provides the opportunity to scale service delivery for functions such as AMHP Care Quality and provider services. It will also help avoid the cost, time and risk involved in disaggregation of services. It will ensure that residents continue to receive services from colleagues that is consistently good.

III. ***The risks presented by the different unitary arrangements:*** Under Option 1(b) there is a presence of numerous self-funders in Gedling and Broxtowe, combined with a reduction in council tax income, could potentially worsen funding challenges, as these regions have a less of a call on the net budget. Under Option 1(b) & 1(e), Mansfield and Ashfield exhibit the highest demand for all services, including safeguarding, mental health, physical support, and hospital discharge. Countywide services, although small are facing high demand, highlight the challenge of disaggregation in areas such as safeguarding, AHMP, shared lives and short breaks. Similarly, under Option 1(e) there are many self-funders in Rushcliffe and as previously stated when combined with loss of council tax income can lead to funding challenges as they have less call on the net budget. Additionally, the transition of residents to the new unitary structure alongside Nottingham City may lead to discrepancies in service quality due to differences in quality of experience, service costs and the potential for poor continuity of care as there are variations in services and service levels between the county and the city. Under option 2 no risks were identified that do not already exist in the service. Option 2 is neutral on outcomes and delivery given it would be status quo.

IV. ***Impact on delivery:*** Under Option 1(b) the potential impact on provider services arises from the possibility of assets could be situated in a different council from those where the residents utilising them currently reside. Newark and Rushcliffe are experiencing a shortage in nursing and residential care, while Mansfield and Ashfield face an increased number of care quality concerns, necessitating greater capacity. Under Option 1(b) and 1(e) there are significant variations in recruitment and retention across the county, with Rushcliffe identified as a recruitment hotspot. Market sustainability is challenged by disparities in provider costs, particularly in bed-based care for working-age adults, with Ashfield's average residential rates being considerably lower than those in Rushcliffe. Similar variations are evident in the costs for those aged 65 and over, Bassetlaw residential cost rate is £102pw less than Rushcliffe (£5k pa) this is further impacted by levels of client contributions. Nursing capacity has significantly diminished in Mid-Nottinghamshire since February 2023, resulting in the loss of 145 nursing registered beds. The complexity of health and system footprints makes apportionment by district difficult, spanning three hospital trusts. Although home care rates show no significant hourly differences across districts, social care record disaggregation and integration with the City Council could present a challenge potentially requiring system replatforming of the Mosaic system. Under Option 1(e) the potential impact on daycare services ending up in a different council that where residents are using them currently. It can also impact hospital discharges and other provider issues. Option 2 maximises the opportunity of working in partnership on a Nottinghamshire footprint with services that are county based. It also for neighbourhood partnerships as efforts are focused on a new relationship as opposed to disaggregating partnerships and adding in the complexity of contracts.

MHCLG Criteria Analysis: Crucial Services (Adult Social Care 3/3)

Option 1(b) and Option 2 are most balanced for accommodating self-funders and align with strategic and operational needs. Option 1(b) is preferred over Option 1(e) due to its alignment with the geographic and demographic characteristics of Nottingham City.

Crucial Services: *Improves service delivery or mitigates negative impact on Adult Social Care*

***Conclusion*:** The analysis concludes that while there is a notable risk associated with disaggregation and quality of service delivery, Options 1(b) and 1(e) present similar levels of risk. The uneven distribution of contracts, assets, and services across the city leads to increased costs and risks when disaggregating services, although this disparity does not significantly affect the risk levels between options 1(b) and 1(e). Effective financial modeling is essential to manage the costs and resources required for these options, addressing system integration and wider issues comprehensively. The assessment suggests that Option 1(b) and option 2 are most balanced for accommodating self-funders and contributions, considering strategic and operational needs. Option 1(b) is preferred over 1(e) strategically due to its alignment with geographic and demographic characteristics of The City, particularly for more urban areas like Broxtowe and Gedling, which are better integrated with the city's infrastructure and facilities.

MHCLG Criteria Analysis: Children's Social Care (1/3)

Below is an assessment of the options against data analysis and comparisons of different unitary arrangements and the opportunities presented.

Crucial Services: *Improves service delivery or mitigates negative impact on Children's Social Care*

I. ***Data Analysis and comparison of the different unitary arrangements:***

Children Looked After: Options 1(b) and 1(e) present similar pictures of need for children's social care, with broadly comparable caseloads in each of the options. However Option 2 results in a greatly imbalanced picture, with 639 children looked after by the City unitary authority, while 905 children will require the support of the new 'Nottinghamshire' unitary authority. Similar trends can be seen for number of referrals, the total for Nottinghamshire is 7,410 whereas the total for Nottingham City is 3,926. Option 1(b) suggests that referrals received would be broadly equal (50% for both) whereas Option 1(e) offers sees slightly more referrals in the wider 'county' area (48% for Nottingham City + Broxtowe + Rushcliffe and 52% for the rest of Nottinghamshire). Option 2 has the greatest difference where Nottinghamshire receiving 65% of the proposals and Nottingham City receiving 35%. This needs to be seen in the context of fragmentation, where resources and staff will require reallocation and the continuity of care for these children will be compromised by reorganisation.

Characteristics of family need: Nottinghamshire sees similar characteristics to much of the country in that neglect is the most common reason for engagement with children's services. However Broxtowe and Gedling record historically high incidences of physical abuse, consistently recording average rates that are 80-90% higher than Rushcliffe over the past three years,. Additionally, Broxtowe reports higher instances of sexual abuse in comparison to Gedling and Rushcliffe. Overall, the levels of all types of need in Broxtowe and Gedling indicate greater alignment with Nottingham City than with Rushcliffe.

Family risk factors: Options 1(b) and 1(e) also differ from Option 2 in terms of the risk factors which result in referral to children's services. Over the past three years, Broxtowe and Gedling have experienced the highest rates of alcohol misuse among parents, with average rates of 48 and 54 per 10k, compared to 25 per 10k in Rushcliffe. There is also a significant disparity in drug misuse among children, with Broxtowe and Gedling reporting 17 instances per 10k, in comparison to Rushcliffe reporting 6 per 10k. Parental drug misuse is notably higher in Broxtowe and Gedling by 70-80%, compared to Rushcliffe. Domestic abuse cases are more frequent in Broxtowe and Gedling, at 22-23 cases per 10k compared to just 11 per 10k in Rushcliffe.Overall, Broxtowe and Gedling exhibit similar levels of alcohol abuse, drug abuse and domestic violence, with Rushcliffe consistently showing rates that are significantly lower than these areas.

MHCLG Criteria Analysis: Children's Social Care (2/3)

Below is an assessment of the options against data analysis and comparisons of different unitary arrangements and the opportunities presented.

Crucial Services: *Improves service delivery or mitigates negative impact on Children's Social Care*

I. ***Data Analysis and comparison of the different unitary arrangements:***

Contextual Safeguarding: Levels of Child Criminal Exploitation (CCE) have been dropping across Broxtowe and Rushcliffe over the past three years although the rate in Broxtowe remains almost double that in Rushcliffe. In Gedling the rate is higher than both other districts. Levels of Child Sexual Exploitation (CSE) have also reduced across all three districts, although average rates in Broxtowe and Rushcliffe over the three-year period are similar and two to three times higher than in Rushcliffe. Overall, levels of CCE and CSE in Broxtowe and Gedling are aligned to those in Nottingham City.

II. ***The opportunities presented by the different unitary arrangements:*** Under Option 1(b) the two new unitary authorities will be providing services to footprints with greater commonality of need which is mainly urban areas, in the city-based unitary of Nottingham City + Broxtowe and Gedling, and to towns and villages in the county. This option offers a more balanced split of Children's Social Care expenditure at 51% for the rest of Nottinghamshire and 49% for Nottingham City + Broxtowe + Gedling. Under Option 1(e) there is an opportunity for a fairer share of tax base across the two new unitary authorities. Finally, Option 2 would avoid any unnecessary fragmentation of CSC. A key factor in determining the success of any arrangement will be engagement with partners such as schools, health providers and the police who are critical in recognising, referring and supporting local authorities in keeping children safe and well.

MHCLG Criteria Analysis: Children's Social Care (3/3)

Assessment of the prioritised options against the other four factors considered: The risks presented by the different unitary arrangements and the impact on delivery. Option 1(b) better aligns with the stated criteria.

Crucial Services: *Improves service delivery or mitigates negative impact on Children's Social Care*

III. ***The risks presented by the different unitary arrangements:*** Option 1(b) results in a greater risk of disaggregation of services and a need to consider programmes such as Family First implementation. Under Option 1(e) if Rushcliffe is disaggregated from the county area to an expanded city area it would have little impact in terms of demand for either new authority. However, relative differences in tax base would present issues in funding delivery. Option 1(e) has a share of children's total expenditure that is three times that of Option 1(b). Opton 2 provides little risk other than the current challenges facing Nottingham City which include current cost pressure and no increase in tax base.

IV. ***Impact on delivery:*** Option 1(b) brings together areas which are similar to each other. Those delivering CSC in the City, Broxtowe and Gedling currently serve large urban conurbations. This option offers the best alignment of service. In Option 1(e), assets may be located in the other authority which would impact, for example, children going to special schools. This is a challenge as spaces are generally filled by the current County service with any surplus places offered to the City. Under this scenario, the situation could be reversed as it would challenge Nottingham City + Broxtowe + Rushcliffe to deliver services to more rural communities that border another county (Leicestershire). Option 2 would disadvantage Nottingham City due to the current tax base, population/demographic and level of needs which would have a significant impact on delivery of CSC. This option offers the least change, disruption and impact to services as CSC is an upper tier function and there no change to the existing footprint.

Conclusion: Option 2 does not meet the MHCLG criteria as it does not establish sensible economic areas with an appropriate tax base. It creates an imbalance which could be an advantage for Nottinghamshire County Council and disadvantage for Nottingham City. Although there is very little difference in the distribution of overall levels of need between Option 1(b) and Option 1(e) , Broxtowe and Gedling more closely align to Nottingham City in levels of need, family risk factors, and contextual safeguarding than Broxtowe and Rushcliffe do. Additionally, children with universal, targeted or specialist SEND needs in Gedling have greater commonality, connection, proximity, association, identity, access and transport links with Nottingham City than those in Rushcliffe. Therefore, Option 1(b) offers a better alignment with the MHCLG criteria.

MHCLG Criteria Analysis: Crucial Services (Children with SEND 1/2)

Assessment of the prioritised options against data analysis, comparison of different unitary arrangements.

Crucial Services: *Improves service delivery or mitigates negative impact on Children with SEND*

I. ***Data Analysis and comparison of the different unitary arrangements:***

SEND measures: Under Option 1(b) and 1(e) the number of initial requests for an EHC Plan in the calendar year 2024 is relatively similar. Under Option 2 the number of requests in Nottingham City is 2,296 in comparison to the rest of the county at 579. Option 2 would create a greater split. For new EHCP demand, Option 1b has a more balanced distribution in comparison to 1(e) or 2. A similar trend can be seen for number of children subject of an EHCPs as of January 2025 and the proportion of children subject to it.

Education measures: Under education measures number of persistently absent pupils (10%+) the numbers are relatively similar for Option 1(b) and 1(e) whereas Option 2 has more variance as Nottingham city has 9,760 whereas the rest of the county has 21,190. For number of severely absent pupils (50+%) a similar trend can be seen. Additionally, for number of permanently excluded pupils and proportion of pupils with one or more suspensions figures for all options are similar to one another.

Additional measures: Option 1(b) and 1(e) present relatively similar figures across all categories. The largest difference can be seen under Option 2, where 71% of the under 17 population resides in Nottinghamshire in comparison to the City. Similar challenges can be seen in number of state funded primary, secondary and special schools and pupil headcount in these institutions. The analysis compares Gedling and Rushcliffe districts using secondary school locality and pupil numbers to determine their characteristics as more "City-like" or "County-like." Gedling has 6,885 secondary pupils attending six schools, with 89% attending schools in postcodes bordering Nottingham City directly (NG4, NG5), indicating strong integration and proximity to the city. Conversely, Rushcliffe has 8,004 pupils across seven schools, but only 48% attend schools near the city boundaries due to physical separations like the River Trent. Many Rushcliffe pupils attend schools further from the city, highlighting its more "County-like" characteristics. Thus, Gedling children's services have closer connections and are more aligned with urban dynamics than Rushcliffe.

1(b): Expenditure on children's services is fairly balanced between the two proposed authorities, suggesting equitable responsibility for delivering services. This option would see a balanced distribution of needs and service delivery, and ensures no single unitary authority faces disproportionate strain. It also supports the case for sustainable service delivery across both authorities.

1(e): Both unitaries areas would serve relatively similar sized populations, ensuring no single authority is disproportionately burdened. Children's service is relatively evenly distributed. This proposed split avoids creating a significant imbalance in service demand and financial burden

Option 2: The data suggests that this option has the greatest imbalance imbalance of SEND services and provision split across the two areas. The split for % of share of childrens' total expenditure is 60% for the Country and 40% for the rest of the county.

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MHCLG Criteria Analysis: Crucial Services (Children with SEND 2/2)

Detailed assessment of the prioritised options against the other factors considered: the opportunities,risks and potential impact on delivert. Option 1(b) best aligns with the goals of LGR.

Crucial Services: *Improves service delivery or mitigates negative impact on Children with SEND*

II. ***The opportunities presented by the different unitary arrangements:*** Under Option 1(b) and 1(e) there is an opportunity to work collaboratively to support children with SEND across both unitaries. Option 2 will enable the locality-based SEND improvement approach to continue for all children and young people with SEND. Additionally, there would be continued improvements to statutory delivery. The distribution of schools and their relationship with new authorities is key to managing future SEND need effectively.

III. ***The risks presented by the different unitary arrangements:*** Under Option 1(b) and 1(e) a new plan for 150 additional specialist school places in Broxtowe aims to address the need for special education capacity, though it might have a limited effect on the overall sufficiency across Nottinghamshire and could particularly benefit Nottingham City. Under Option 1(e) a significant loss of revenue fund statutory SEND services from Rushcliffe which has lower rates of children with EHCPs or specialist provision than other areas of Nottinghamshire. Option 2 maintains the current provision.

IV. ***Impact on delivery:*** Option 1(b) has less impact on delivery in comparison to the other models as level of demand for SEND services in Broxtowe and Gedling are in the average band. Under Option 1e there would be a need for joint working with a shadow authority to put a plan in place for SEND sufficiency which could lead to significant impact on availability of provision. Additionally, local authority statutory teams would see very little impact. Option 2 would main the current provision.

Conclusion: Option 1(b) best aligns with local government reorganisation criteria, offering a balanced distribution of demand and service delivery for SEND and not posing challenges to the reallocation of resources, workforce, or caseloads. Although both Option 1(b) and Option 1(e) present a risk to the sufficiency of specialist SEND provision, this risk could be managed through collaborative efforts between authorities during the shadow authority period. Option 1(e) also aligns well with reorganisation aims, but faces challenges due to lower SEND demand in Rushcliffe, leading to an imbalance between service demand and the income needed to meet it. As a result, the impact on SEND sufficiency might be more pronounced than in Option 1(b). Option 2 does not fulfill the reorganisation objectives, as it creates unitaries with increased viability issues and perpetuates an imbalance of SEND services and provision across two areas.

MHCLG Criteria Analysis: Crucial Services (Homelessness 1/2)

Set out below is an assessment of the prioritised options against data analysis and comparison of different unitary arrangements. Option 1(b) and Option 1(e) have relatively similar values to one another. Option 2 has greater variability and higher rates across most metrics.

Crucial Services: *Improves service delivery or mitigates negative impact on homelessness*

I. ***Data Analysis and comparison of the different unitary arrangements:***

Household prevention duty: The data shows a comparison between Option 1(b), 1(e) and 2 regarding the number of households owed prevention duty and the rate per 1,000 households for two time periods, 2023-24 and 2024-25. Option 1e offers the lowest values for both years in terms of lowest rate per 1,000 households. If reducing the actual number of households owed prevention duty is looked at Option 1(e) still offers the lowest numbers relatively in comparison to Option 1(b) or Option 2. However, it is important to note that the differences between the three options are relatively moderate.

Households owed Relief Duty: The data shows the three options regarding household owed relief duty. Under number of households discrepancies can be seen in all options. Under Option 1(e) greater pressure will be felt on Broxtowe, Nottingham City and Rushcliffe as the number of households in 2023-24 were 1,970 where as in the rest of the areas the total was 907. A gradual decrease can be seen in 2024-25. Similarly, under rate per 1,000 households option 2 shows extreme values for Nottingham city in comparison with the rest of the county.

Households in temporary accommodation: The data compares the three options regarding households in temporary accommodation. Under number of households, Option 1(b) puts greater pressure on Broxtowe, Gedling and Nottingham city. However, it is important to note that the figures for 1(b) and 1(e) are relatively similar to each other across both time frames. For rate per 1,000 households option demonstrates fluctuations and higher numbers in comparison for Nottingham City than the rest of the county.

Rough sleeping over the month: The data compares the three options regarding rough sleeping over the month. Under number of people the split between Option 1(e) is greater than Option 1(b) and option 2. This indicates that there will be a larger number of people experiencing rough sleeping over the month in Broxtowe, Nottingham City and Rushcliffe in comparison to the County and also in comparison to Option 1(b) and 2. For rate per 100,000 people option 2 shows significantly higher rates for Nottingham City in comparison to the rest of the county. It is important to note that figures were relatively similar for Option 1(b) and 1(e).

Households on housing register: Option 1b and Option 1e has very similar values where as option 2 shows fluctuations highlighting higher discrepancies in demand or resource allocation. Similarly, rate per 1,000 household is highest for option 2 suggesting a more concentrated or higher demand in Nottingham city, which would indicate a need for enhanced housing solution or capacity.



Across most categories Option 1(b) & 1(e) show similar patterns. They generally provide moderate and stable numbers for households and rates, indicating a balanced approach to resource allocation and management. Option 2 has greater variability and often higher rates in specific categories, especially rough sleeping and housing register metrics.

MHCLG Criteria Analysis: Crucial Services (Homelessness 2/2)

Set out below is an assessment of each options against the other factors considered: the opportunities, risks and potential impact on delivery. The analysis does not identify a preferred option, however, based on geographic and demographic similarities Option 1(b) would align more to the MHCLG criteria than the other options.

Crucial Services: *Improves service delivery or mitigates negative impact on homelessness*

II. ***The opportunities presented by the different unitary arrangements:*** The document identifies several opportunities that can potentially enhance service delivery and resilience across Nottingham and Nottinghamshire. By leveraging economies of scale, authorities can achieve more resilient services and better value, through broader geographical procurement and resource sharing, including staffing, IT, and out-of-hours arrangements. This could lead to centralised coordination and an effective response to performance metrics and data management. There's potential to adapt services to address intensified needs through larger geographical coverage, such as establishing women-specific homelessness hostels. A unified strategy and sharing best practices can lead to consistent approaches to tackling homelessness challenges, complemented by enhanced collaboration between housing and social care sectors. Improvements in housing/TA supply can be achieved through shared access to grants/funding/land for new build, renovation or acquisition. Opportunity for programmes such as Making Every Adult Matter (MEAM) and changing futures as it would provide better consistency of approach in supporting disadvantaged people across the two areas. Under Option 1(e), many Rushcliffe rough sleepers would have access to Nottingham City which could improve and streamline customer experience.

III. ***The risks presented by the different unitary arrangements:*** The document outlines serval generic threats and risks associated with homelessness strategies and services in Nottingham and Nottinghamshire. It highlights a changing policy context, including reforms to private sector housing and supported housing regulations, which could affect service delivery. Changes to the local connection criteria might complicate meeting levels of need, if the criteria is broadened and anticipated revisions to funding formulas for the Homelessness Prevention Grant could impact funding availability, especially if current funding streams are merged or altered based on geographic or population factors. Manfield's unique Domestic Abuse Housing accreditation stands at risk if other areas fail to achieve similar recognition. Furthermore, there is a need for increased responsiveness to individuals moving across geographic boundaries, particularly in the South/City areas. Predicted future trends suggest an increase in homelessness due to factors such as rental reform and rising living costs, although the options may not significantly affect visible rough sleeping or street-based activity, which remain concerns for residents. Additionally, the rising use of temporary accommodations poses a financial threat to general fund resources, with variations occurring among different authorities based on need and TA supply. Lastly, potential disinvestment in non-statutory services by Public Health and the risk of reduced locally driven insight and service delivery due to funding competition are also flagged as concerns. Under Option 1(b) & 1(e) there is a risk that the sole authority left with links to the hospital trust in the South would struggle to have the same impact around housing/homelessness related challenges. This risk could be mitigated by a new city-aligned authority taking lead on the relationship and work for both areas.

IV. ***Impact on delivery:*** Under Option 1(b) & 1(e) there could be reduced homelessness impact which suggests the possibility that these options could dilute the focus on homelessness due to changes in administrative boundaries and service configurations. Such dilutions may lead to less effective strategies and approaches to tackling homelessness because resources and efforts might be spread too thin across newly defined authorities. Changes in how services are organised might lead to unclear or fragmented service pathways, affecting how people move through systems to receive support and housing. Finally, there is a concern that restructuring could lead to weaker collaboration and communication between health services and housing/homelessness services. This could hinder integrated efforts to address homelessness.

Conclusion: It is important to note that homelessness does not have significant impact in choosing between either of the options; but should be considered in designing service delivery or organisational functions.

MHCLG Criteria Analysis: Crucial Services

Set out below is a high level summary of the assessment of the Crucial Services criteria for the options under consideration in Nottingham and Nottinghamshire.

Sub-criteria	1b Nottinghamshire and Nottingham City + Broxtowe + Gedling	1e Nottinghamshire and Nottingham City + Broxtowe + Rushcliffe	2 Nottinghamshire and Nottingham City
Data analysis and comparison of the different unitary arrangements	*Similar patterns across Option 1(b) and 1(e), though 1(b) favoured due to similar geography and demography e.g. children in Gedling with social care needs having greater identity with / proximity to City services.*	*Rushcliffe experiences lower demand for SEND, resulting in an imbalance between the demand for the services and income required to sustain them. Nonetheless, when overall data is examined similar trends can be seen between 1(b) and 1(e).*	*Option 2 shows variability and generally higher rates in data pertaining to homelessness, ASC and SEND. This option creates an imbalance in ASC and SEND services*
The opportunities presented by the different unitary arrangements	*No specific opportunities identified for improving homelessness and SEND services, though Option 1(b) would offer more balanced distribution of CSC and deliver ASC services to areas with greater community of needs.*	*No specific improvement opportunities identified for ASC and SEND, though Option 1(e) may help streamline homelessness services as rough sleepers have a local connection to Notts City, and provide a more fair share of tax base for CSC.*	*Enhanced service delivery for functions such as AMHP quality and provider services. Option 2 can help mitigate the cost, time and risk associated with disaggregation. Furthermore, it enables a localised approach to SEND.*
The risks presented by the different unitary arrangements	*Concerns around disaggregation of ASC, CSC and SEND sufficiency, alongside general impact on provider services as services could be situated in areas where individuals no longer reside.*	*There is a loss of revenue to fund statutory SEND services due to Rushcliffe having lower rates of EHCPs or specialist provisions compared to the other areas of Nottinghamshire. The share of children's total expenditure is greater.*	*No specific risks have been identified for Option 2, and it presents no new risks beyond those currently existing within the services e.g it is not impacted by disaggregation.*
Impact on delivery e.g. staffing considerations, geography	*Potential fragmentation of homelessness services given confused pathways and weaker relationships between health and housing/homeless teams/services.*	*There are challenges with delivery of ASC, CSC and SEND services, particularly the loss of income for the county authority.*	*There is no impact on the delivery of homelessness, ASC or SEND as the current service provision is maintained. However, there is still challenges with the imbalances present within these services.*
Summary	Option 1(b) aligns most effectively with the LGR objectives, providing a relatively balanced distribution of demand and services for homelessness, ASC, CSC and SEND. Broxtowe and Gedling also have higher population demographics similar to the City.	Option 1(e) somewhat aligns with the LGR objectives but faces geographic and demographic challenges for homelessness, ASC, CSC and SEND services, with the county-authority facing a loss of revenue.	Option 2 does not meet the LGR objectives due to increased viability issues and services imbalances, despite maintaining the current level of service delivery.

Note: RAG rating indicates how the option aligns to the MHCLG criteria relative to the other two options

6. Financial Analysis

Financial Modelling: Updated Analysis Overview

This section provides an overview of the phase 1 analysis and the updates made since March 2025.

Phase 1 Analysis

In Phase 1 an initial evidence based options analysis was completed for local government reform. The financial model formed a part of the quantitative analysis to investigate the costs and benefits for a wide range of options all of which were based on current district and unitary authority boundaries.

The s151 officer met on 15 May to review the financial model methodology and outputs. During that session there were some further clarifications sought. Subject to these clarifications all agreed that the case was sufficient to enable the s151s to provide assurance to their Councils that the case was appropriate.

This position was confirmed at the Finance Officers meeting on 23 May. The revised financial analysis was shared with s151 officers on 3 June ahead of a LGR specific meeting of s151s on 9 June. This included some sensitivity analysis the group requested on the assumptions.

In addition the County Council have undertaken some analysis on the potential impact on Options 1b &1e of social care self funders in the event that leads to an important difference in the cases. It has been concluded that this does not.

Updates post March 2025

Assumptions 1 — Some changes were made to assumptions such as reduction in front office FTE, service delivery FTE, reduction in back office FTE, property rationalisation, SRA cost per new unitary authority.

Benefit Phasing 2 — The benefit realisation period has been changed to 30% in the first year, 50% in the second year and 100% after that.

Definitions 3 — The definitions of types of FTE service are have been provided. This includes specific definitions for front office, service delivery and back office.

Overall benefits and costs 4 — As a result, there is a change in the total overall benefits and costs since the figures set out in the interim plan in March 2025.

See Appendix B for the methodology and assumptions applied

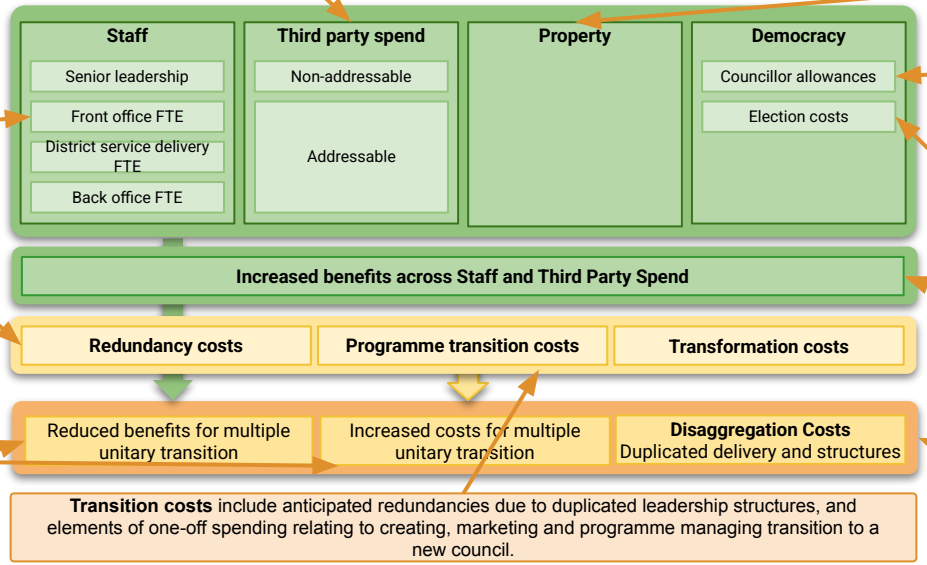
Financial Modelling: Definitions (1/3)

The financial analysis model relies on a number of assumptions, primarily based on publicly available outturn data, information from each council's own transparency data, or by applying changes which have been demonstrated across previous LGR proposals.

Third-party spend refers to all payments made by local councils for goods and services from external suppliers, excluding grants, taxations, and other charges. Addressable spend is the portion of this expenditure that can be influenced through procurement or commissioning strategies such as negotiating contracts or seeking competitive bids. In contrast, non-addressable spend includes costs that are less flexible and mandated by law, making them harder to influence.

Property expenditure relates to the cost associated with acquiring, maintaining, and managing both **operational** properties (used for delivering council services) and **investment** properties (held for income or capital appreciation). This includes expense such as maintenance, utilities, insurance and management fees.

FTE is calculated as a proportion of spend as supplied in public spending data. **Net revenue expenditure** is used to avoid double-counting any income or grant transfers. **Senior leadership** salaries are calculated across the top three organisational tiers as per transparency reporting.



Member allowances are based on rates of Basic and Special Responsibility payments published in transparency reporting. These costs are used to determine the likely cost of one or more new democratic structures in new authorities

Election costs use a total of votes cast in a previous election cycle across all council elections, and a cost-per-vote of £3 calculated by the Electoral Commission

Redundancy costs do not include actuarial strain as this is highly individualised. A payment of 30% of salary is assumed.

Benefits are profiled to be fully effective in Year 3, to account for the need to complete staff changes and undertake contract renegotiations.

Costs such as the creation of new councils, marketing, ICT and consultation are increased proportionately where more than one new council is to be formed. Similarly, fixed **benefits of transition** are shared across all new bodies.

Disaggregation Costs are incurred where an option involves dividing a county level authority into two or more unitaries, and represents the ongoing cost of duplicating management and operations of statutory services, including social care, education and public health. **An element of disaggregated costs therefore recur each year in options with more than one unitary authority**

Transition costs include anticipated redundancies due to duplicated leadership structures, and elements of one-off spending relating to creating, marketing and programme managing transition to a new council.

Financial Modelling: Definitions (2/3)

Definitions for Front office, Service delivery and back office are set out below.

Category	Definition	Activities	
Front office	Front office described all the activities that involve interaction with customers and/or have an immediate impact on customer service delivery. It involves all activities that lead up to and follow on from serving the customer, without capturing the actual act of delivering the service. ***A customer is defined as a person who uses any council service.***	• Enquiry Handling • Processing Requests and Applications • Managing Appointments • Eligibility • Simple and Rules Based Assessment • Complex Assessment • Approval of Service	• General Administration (for frontline operations) • Recording and Data Entry • Closing Record • Management and Supervision (for frontline operations) • Workforce Planning (for frontline operations) • Workforce Scheduling (for frontline operations) • Billing and Receiving Payments
Service Delivery	The actual delivery of a frontline service on behalf of the council which fulfils the needs of external customers.	• Service Delivery	
Back office	The activities aligned to this category provide support to other service areas: • Corporate Services include the activities that support the council in operating effectively on a day-to-day basis. • Strategic Services contain the activities that are central to influencing and executing the councils corporate strategy. • As for Support Services, these activities will all contain an element of transactional activity (e.g. within HR and Finance), but are more broadly aligned to the delivery and support of the strategic direction of the council.	• General Administration (Corporate, Strategic & Support Services) • Health and Safety • Technology • People Management • Budgets and Financial Management • Payroll Services • Key Data Sets • Property, Estate and Facilities Management • Management and Supervision (Corporate, Strategic & Support Services) • Stores and Distribution • Workforce Planning (Corporate, Strategic & Support Services) • Fleet and Plant Management	• Democratic services and support provided to elected Members • Legal Advisory Services • Programme and Project Management • Purchasing, Procurement and Commissioning • Managing Contracts • Marketing, PR and Communications • Strategic Planning and Policies • Research and Consultation • Quality Assurance, Performance Management and Improvement • Business Information, Data Analysis and Reporting

Financial Modelling: Definitions (3/3)

Definitions for the various elements of the financial model are set out below.

Definitions	
Transition costs	Costs involved in moving from existing systems to another. This includes fixed costs and redundancy costs incurred (excluding disaggregation). These are one-off costs to reorganisation within Nottingham & Nottinghamshire.
Benefits of Aggregation	Benefits that would arise from reorganisation. This primarily looks at the benefits of collapsing multiple local authorities into a fewer number of local authorities. This will include savings made on: staff, third party spend and property. In addition to this, benefits arising from savings on running democratic processes are also defined. There are percentage reductions applied to each type of benefit saving.
Annual benefits	Annual benefits that are generated as a result of reorganisation. These are calculated as a sum of the front office, service delivery and back office expenditures, as well as third party spend, senior management, property and democracy costs.
Recurring benefit after 5 years	The recurring annual benefit after five years of reorganisation. It is estimated that the full benefits will be realised after five years.
Payback period (years)	The payback period is the time required for the investment in unitarisation to generate sufficient cash flows to recover its initial cost.

Financial Modelling: Purpose and limitations

The options analysis financial modelling provides a tool for comparing potential options for future LGR, based on publicly available data and a set of agreed assumptions. The model accounts for the cost of delivering the new structure in terms of **transition** and **ongoing disaggregation** costs of leading delivery of all unitary council services across the new geographies identified in each option.

What the model does:

- The financial model provides an **independent and policy-neutral comparison** of differing structural approaches to LGR.
- It focuses on the **costs of transitioning** and **running costs of new leadership and political structures.**
- It includes the anticipated costs needed to undertake **the next phases of LGR activity** - programme design and management, building a detailed business case, ICT requirements, delivering consultation and comms, etc.
- Combined with potential additional analysis it provides **a foundation for the detailed business case** to follow.
- The model is **recognised by MHCLG and Treasury** as a reasonable means of determining the potential scale of benefits available from LGR at options analysis stage. It is not developed to the level of detail that is required for a full proposal.

What the model doesn't do:

- The financial model will not at this stage predict the **costs of delivering services** in a new structure.
- It does not account for future policy decisions around the **apportionment of debt, reserves or assets** between constituent councils.
- It does not account for **actuarial costs of redundancy**, which require a detailed review of individual employee's circumstances.
- The transformation costs and benefits are estimates based on experience in other local authorities applied to local spend, they do not represent a **detailed review of your third party spend.**
- The model is based on static, published data and **does not include the influence of increased demand** on running costs.

Financial Modelling: Updated analysis

The financial model incorporates key structural and management costs, including redundancy estimates, senior leadership changes, and anticipated savings across cost categories.

	Transition costs (£)	Annual benefits (£)	Net benefit after five years (£ total)	Payback period (years)
Option 1: 1(b) & 1(e)	£28,848,294	£24,620,878	£64,711,043	1.3
Option 2: Nottinghamshire & Nottingham City	£21,250,744	£24,620,878	£72,308,593	Less than 1 year
Option 3: Single Unitary Authority	£19,249,433	£30,044,575	£94,919,953	Less than 1 year

Comparative purposes only

The methodology is set out in Appendix B and includes a clarification as to what is and isn't covered for the purposes of an options analysis. There are some considerations for the full financial case that have not been included at this stage including potential impact of the Fair Funding Review 2.0 which is currently in live consultation.

Financial Modelling: Planning of costs and benefits

The table below provides an overview of the phasing of benefits, transition costs and disaggregation costs which have been tested with the s151 officers.

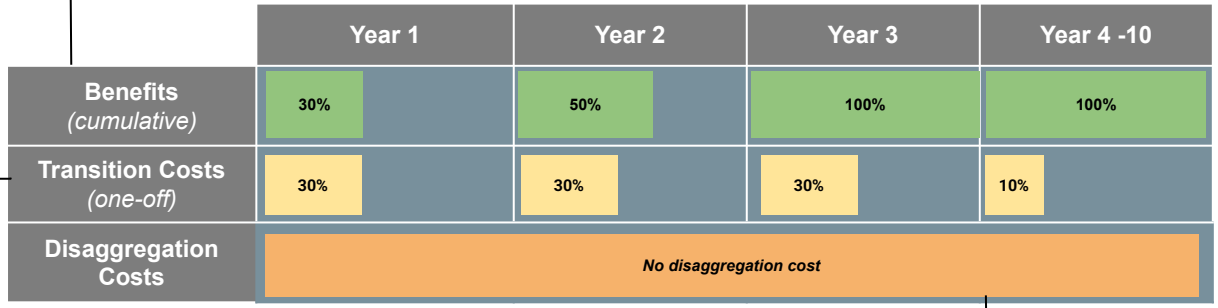
Impact of Phasing

In modelling the impact of costs and benefits, assumptions have been made to reflect their realistic phasing. This ensures that one-off costs are spread over multiple years rather than being incurred immediately, alongside the ongoing costs of transition.

Benefits are phased over a 3 year period, recognising that some efficiencies - such as senior leadership reductions - can be realised quickly, while others, like contract realignment and third-party spend savings, will take longer to achieve. This approach accounts for operational complexities, contract obligations, and the time required for full implementation.

It is important to note that the benefits outlined here relate solely to system aggregation, rather than service transformation. The efficiencies modelled do not include potential improvements from broader service redesign, which would be considered separately.

The phasing of the annualised **benefits** is over three years, due to the varying timescales for different aspects of delivery, after 3 years the full annual benefit is assumed. This includes ongoing cost reduction programs, the timing of the next election, and the expiry of third-party contracts. Transformation benefits have not been included.



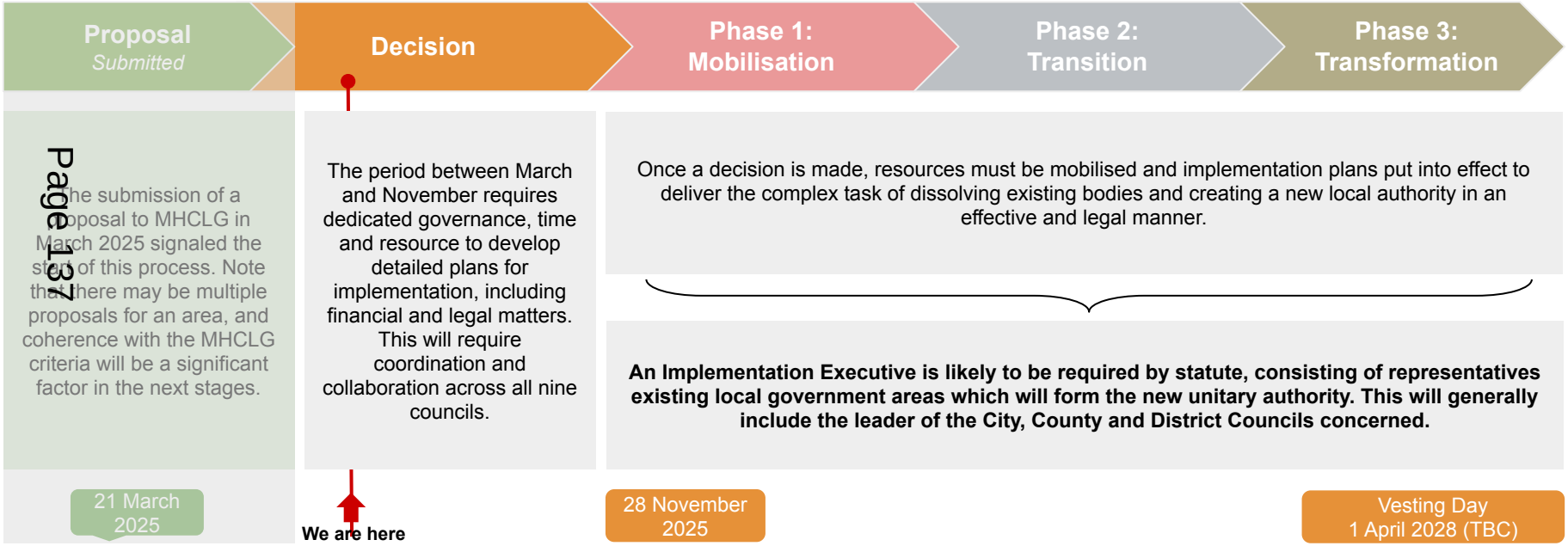
Transition costs are spread over a longer period rather than being completed within a single year, ensuring a more realistic and feasible approach. Costs are incurred over three years, with Years 2 and 3 primarily covering recontracting, system migrations, workforce adjustments, and other transition-related expenditures. This phased approach accounts for contractual constraints, the complexity of workforce changes, and the time required to reorganise services, reducing financial risk and operational disruption.

Disaggregation costs arise from splitting county services into new councils, leading to ongoing expenses for duplicated leadership and operations but excluding service delivery costs.

7. Implementation

Implementation: indicative timeframe to implementation

This section outlines key timescales, activities, and opportunities in Local Government Reorganisation. The following pages set out some of the required steps to developing a full business case proposal for submission in November and some of the post-decision implementation activities.



Implementation: Development of the final proposal (1/4)

A significant range of activities will need to be completed prior to final submission of the proposal in November 2025. This includes stakeholder engagement, legal, financial and organisational development activity, which will require specific capabilities and dedicated capacity.The immediate next step is for Chief Executives and Members to take a decision on which option(s) to take forward to develop into a full business case.



Interim Plan: by 21st March 2025 Submitted

An interim was submitted to MHCLG on 21st March 2025:

- ❏ This plan outlined the proposed options under consideration and how they are likely to achieve efficiencies, improve capacity and withstand financial shocks.
- ❏ More detailed analysis and engagement needs to take place post this submission to refine the options and develop a full business case.
- ❏ Engagement will also need to take place with EMCCA, local MPs, parish councils and wider system partners such as police and fire services and the ICS. During this period an engagement and consultation plan needs to be developed in order to gather input and assess support for proposals.



Final proposal: by 28th November 2025

Based on feedback from the interim plan, Nottingham & Nottinghamshire will need to refine their proposals to ensure they have met all the criteria set out by the MHCLG, including (indicative not exhaustive):

- ❏ Agreeing the resources which each council will commit to funding the process.
- ❏ A need to prepare for implementation of the new interim structures, including planning for any necessary changes to governance, staffing and service delivery
- ❏ Appointment of a responsible officer and cabinet member in each council. The members will form a LGR committee which may transition to be a shadow unitary council executive as vesting day approaches.
- ❏ Design the appropriate directorate and senior leadership structure for the new authority
- ❏ Finalise arrangements for HR changes and staff redundancy, including any provision for a voluntary scheme, and how this cost will be impact existing councils
- ❏ Determine a plan for disbursement of debt and reserves in consultation with joint S151 officers
- ❏ Agree and undertake a joint plan for consulting the public with Districts.
- ❏ Agree and undertake a joint plan for consulting staff, including engagement with Trades Unions.
- ❏ Agree an approach to harmonising council tax across Districts, including how Council Tax Relief will be harmonised
- ❏ Conduct equality impact assessments of proposed arrangements
- ❏ Plan for the costs and legal aspects of winding up existing authorities and creating a new statutory entity
- ❏ Understand the risks and implications of existing assets, liabilities and HRA provision.

Implementation: Development of the final proposal (2/4)

Set out below is a very high level view of the remaining timeframe available for decision making and development of a full proposal ready to be submitted in November 2025.



Implementation: Development of the final proposal (3/4)

An overview of how the options analysis would need to develop into a full proposal is set out below and on the following page.

Refining the options appraisal 1

- Since submission in March, the Options Analysis has been narrowed down to three options: Option 1(b), Option 1(e) and Option 2.
- Deep dives have been conducted against MHCLG criterion such as sensible economic area, sensible geography and crucial services.
- The financial analysis has been updated.

Developing the full proposal 2

- The stated intention is to develop a single proposal, working collaboratively. The points set out below would need to be developed in any full business case proposal.
- A vision for the new council(s), including the improved outcomes expected to be delivered for people and the place.
- Design of a high level target operating model for the new council(s); including customer offer, ways of working, culture and values, how technology and information will be utilised etc. and describing what residents will experience.
- Identifying opportunities for service synergies - consolidation of existing functions, simplification of processes and opportunities arising from bringing district and county together (e.g. housing and social care), as well as district and existing unitary functions together.
- Designing the arrangements that will be put in place at a locality level to build engagement and ensure the new councils are responsive locally.
- Clarify the democratic structures that will be put in place - e.g. structures and numbers of councillors, key milestones and decision points.
- Determining how the new council(s) will work with EMCCA
- Describing how the the new councils will work towards more ambitious public service reform, working with other providers in the geography.
- Determining how any new council(s) will work together to share certain functions.
- Developing an implementation roadmap, which will identify the target and interim states for the new council(s).

Developing the financial case 3

- Identifying the costs and benefits associated with the implementation of unitary local government across Nottingham and Nottinghamshire, taking more precise account of data concerning:
  - the establishments of all impacted councils;
  - assets and liabilities (including physical assets, reserves, debt and MRP); contracting and other partnership arrangements; IT architecture; grant funding and additional income; and Council Tax implications.
- Developing the investment and benefit profiles that will drive implementation.
- Developing the investment strategy required to fund implementation.

Implementation: Development of the final proposal (4/4)

Due diligence 4

- While the work described under workstream 2 would not entail due diligence (e.g. line by line reviews of all contract and commissioning arrangements, review of assets, liabilities, IT infrastructure etc.), it is anticipated that work of this nature will commence in the period leading up to the November submission.

Communi-cation and engagement 5

- Developing a comprehensive communications strategy to support the development and submission of proposals. This would include a focus on:
  - staff engagement (sharing communication assets across all of the impacted councils);
  - member engagement, including the provision of members to come together for visioning workshops and design discussions;
  - stakeholder engagement - working with MPs, the town and parish councils, as well as public, private and voluntary sector partners to discuss and explain the changes being proposed; and
  - community and public engagement - focus groups, engagement meetings and other forms of communication.
- Consolidating the responses and views gathered during this activity to inform the development of the November submission and evidence support and / or opposition to the establishment of the new council(s).

Mobilising programme workstreams 6

- There is a commitment to deliver an ambitious transformation programme in parallel with the transition to the new council(s). To this end, work is intended to commence in the following areas:
  - service design;
  - consideration of technology requirements;
  - HR - approach to change management, migration of staff to the new council(s);
  - OD - foundational work on culture, behaviours, values and ways of working;
  - branding and buildings; and
  - legal and governance arrangements (including the Structural Change Order, shadow governance arrangements and senior appointments).

Implementation: implementation roadmap

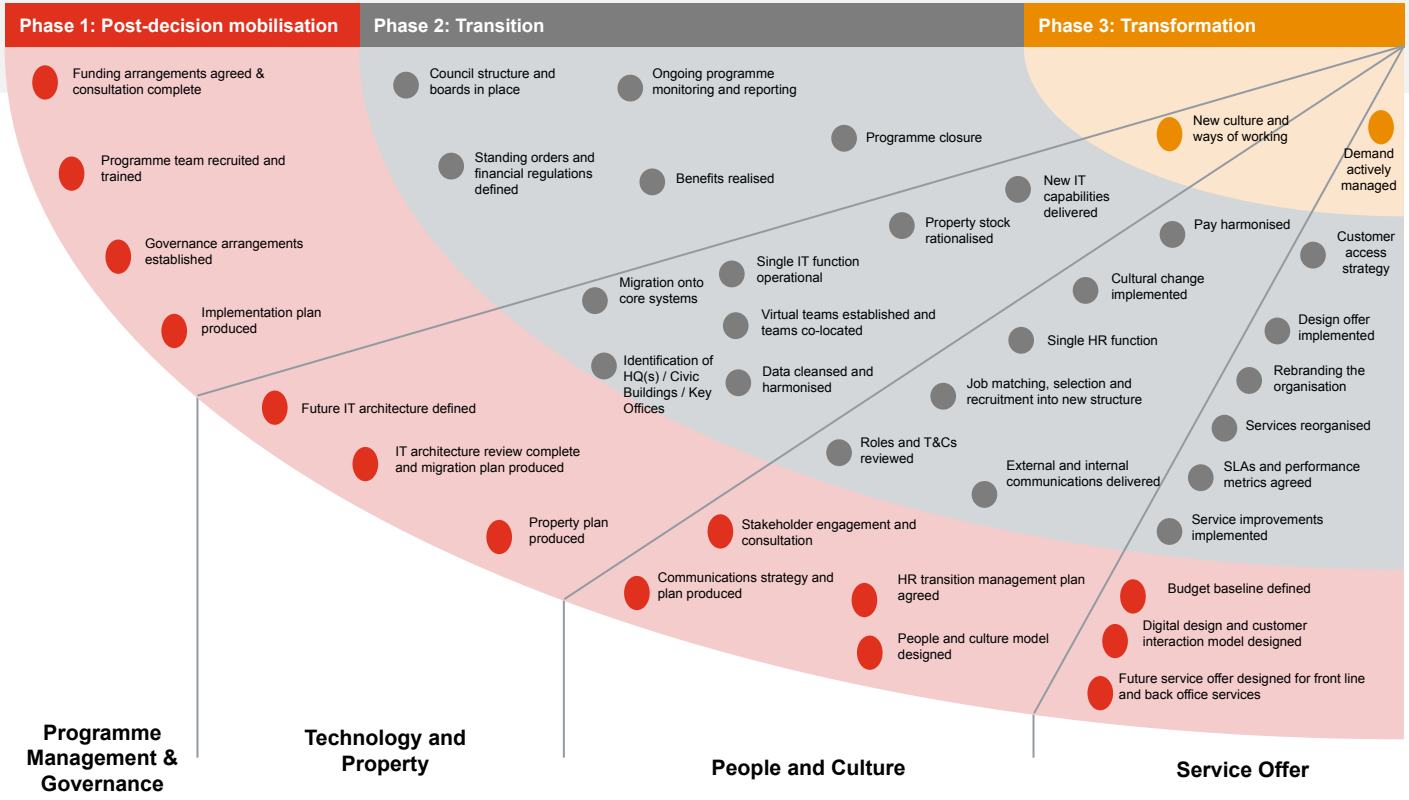
Phase 1: Mobilisation

Phase 2: Transition

Phase 3: Transformation

Detailed implementation plans will be developed during the mobilisation phase outlined above and in the diagram. This implementation map provides an overview for the key activities which will need to be undertaken by officers and members as vesting day approaches, and which will need to be accomplished alongside business-as-usual in terms of service delivery.

The financial model includes a high level estimate that **c. £13m** will be required for internal and external support for the process under Option 1(b) and 1(e). This is consistent (and a conservative estimate at this stage) with previous rounds of LGR.



Implementation: Immediate next steps and planning

Immediate next steps is for Chief Executives and Members to take a decision on which option(s) to take forward to develop into a full business case in July 2025 and begin planning for implementation including early scoping on programme support and workstreams (outlined below).

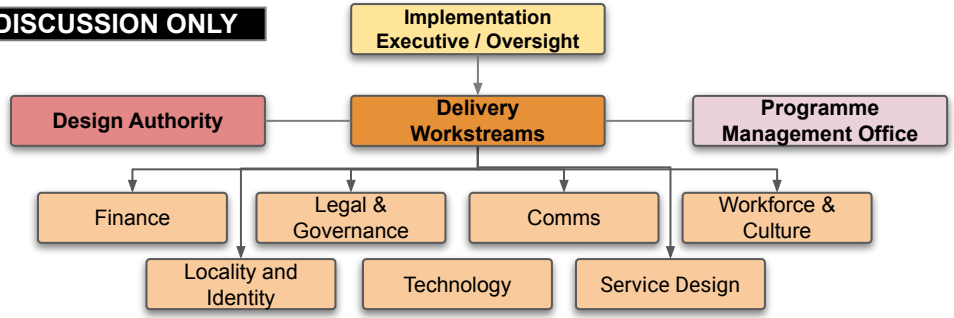
Immediate next steps

- Summary report shared with CEXs
- Confirm LGR Meeting date to take decision on which option to take forward
- Decision on the options analysis and potentially a preferred option.
- Agree coordination and collaboration arrangements where required

Immediate next steps for programme infrastructure set up (not exhaustive)

- Agree resources to coordinate efforts across all councils
- Agree leadership, governance and oversight arrangements
- Identify and establish officer working groups for relevant projects and programmes
- Work with workstream leads to identify the key tasks for each group, secure the appropriate membership and to ensure time and resources are protected to meet the time pressures.
- Agree a stakeholder and engagement plan

DRAFT FOR DISCUSSION ONLY



Governance	Description
Implementation Executive	• Likely to be required by statute, consisting of representatives existing local government areas which will form the new unitary authority. This will generally include the leader of the City, County and District Councils concerned, Chief Execs and s151 officers. • Responsible for overall strategic direction, oversight of risk, and benefit realisation and meets monthly, or more frequently during critical periods
Delivery Workstreams	• Example workstreams outlined above; each chaired by a Senior Director (from pool of affected councils) with delegated authority, and reports progress, risks, issues and resource needs to the Implementation Executive
Programme Management Office	• Centralised function for planning, reporting, dependency and risk management across all workstreams and driving interface with other enablers (Finance, ICT, Legal, Procurement), ensuring a "single version of truth" through common tools, templates and reporting standards
Design Authority	• Technical group reviewing service design, TOM alignment and systems integration to ensure joined-up thinking

8. Appendix A:
Criteria Analysis

Criteria Analyses (1/2)

The table provides details on the information which was included in the additional analysis.

Title	Prepared by	Date	Description	Conclusion
'Sensible Economic Areas' for Local Government Reorganisation in Nottingham and Nottinghamshire	Council officers across the nine Nottingham Nottinghamshire authorities.	23/05/2025	The analysis provides an overview of travel to work, economic self-containment, housing market areas and service market for consumers for the three options.	Concludes that the differences in degree of fit are too narrow to be able to identify a clear better fit, though Option 1(e) marginally (< 1 percent) provides a stronger fit with the Travel to Work Area (TTWA) and the Housing Market Area (HMA).
Assessment of proposed options for unitary local government in Nottinghamshire in terms of increasing housing supply and meeting local needs	This report has been prepared in conjunction with Nottingham and Nottinghamshire Heads of Planning and has been shared with officers of the East Midlands Combined County Authority.	07/05/2025	The analysis provides an overview of impact on potential to increase long term housing supply, impact on transition to system of a Spatial Development Strategy & Local Plans, impact on meeting local housing needs and impact on other issues such as mineral and wasting planning.	Concludes that Option 1(b) may not accelerate housing supply in the same way that Option 1(e) might, with 1(e) potentially having a wider mix of housing supply sources and reflecting existing joint workings on GNSP.
Assessment of potential options for unitary local government in Nottingham and Nottinghamshire in context of Adult Social Care services	Council officers across the nine Nottingham Nottinghamshire authorities.	05/2025	The analysis provides an overview of homelessness in Nottingham and Nottinghamshire along with the opportunities, risk, service delivery impacts and data analysis of the three options.	Option 1(b) is the preferred option due to its alignment with geographic and demographic characteristics of Nottingham City. Broxtowe and Gedling are better integrated with the city's infrastructure and facilities.

Criteria Analyses (2/2)

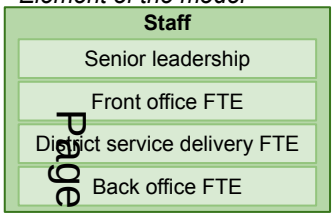
The table provides details on the information which was included in the additional analysis.

Title	Prepared by	Date	Description	Conclusion
Assessment of potential options for unitary local government in Nottingham and Nottinghamshire in context of Homelessness	The document has been developed by a core group of lead officers representing the local authorities with the support and consultation of a wider cohort of officers from each district, borough, City and also the County Council.	05/2025	The analysis provides an overview of homelessness in Nottingham and Nottinghamshire along with the opportunities, risk, service delivery impacts and data analysis of the three options.	The analysis does not identify a preferred option. Under both Option 1(b) and Option 1(e) there could be reduced homelessness impact due to changes in administrative boundaries and service configurations.
Assessment of potential options for unitary local government in Nottingham and Nottinghamshire in context of Children's SEND services	Council officers across the nine Nottingham Nottinghamshire authorities.	05/2025	The analysis provides an overview of SEND services in Nottingham and Nottinghamshire along with the opportunities, risk, service delivery impacts and data analysis of the three options.	Option 1(b) is the preferred option as it best aligns with the goals of local government reorganisation, offering a balanced distribution of demand and service delivery for SEND and not posing challenges to the reallocation of resources, workforce, or caseloads.
Assessment of potential options for unitary local government in Nottingham and Nottinghamshire in context of Children's Social Care services	Council officers across the nine Nottingham Nottinghamshire authorities.	05/2025	The analysis provides an overview of Children's Social Care Services in Nottingham and Nottinghamshire along with the opportunities, risk, service delivery impacts and data analysis of the three options.	Option 1(b) is the preferred option as Broxtowe and Gedling more closely align to Nottingham City in terms of levels and types of safeguarding needs, which would allow for more targeted / focused service delivery models to be deployed.

9. Appendix B:
Financial Assumptions

Key assumptions: Benefits of aggregation (Staff) (1 of 2)

Element of the model



Methodology

1. The combined County and District Councils spend on staff has been estimated, and grouped into front office, service delivery, and back office spend based on local authority averages.
2. Percentage reductions have been applied to front office, district service delivery and back office full-time equivalent (FTE). These reflect the efficiencies gained from removing duplicated activity.
3. These percentage reductions are higher for a single unitary authority and revised down for a two unitary authority model due to forgone economies of scale.
4. An additional benefit has been calculated from removed District senior leadership posts, including on-costs.

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
Proportion of net revenue expenditure spent on staff	31.3%		Calculated through publicly available RO forms.
Front Office FTE	36%		
Service Delivery FTE	37%		Percentage reductions in line with previous local government spend reduction and reorganisation work and tested with the Sect 151 Officers.
Back Office FTE	27%		

Key assumptions: Benefits of aggregation (Staff) (2 of 2)

Element of the model

Staff

- Senior leadership
- Front office FTE
- District service delivery FTE
- Back office FTE

Methodology

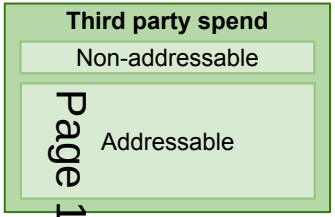
1. The combined County and District Councils spend on staff has been estimated, and grouped into front office, service delivery, and back office spend based on local authority averages.
2. Percentage reductions have been applied to front office, district service delivery and back office full-time equivalent (FTE). These reflect the efficiencies gained from removing duplicated activity.
3. These percentage reductions are higher for a single unitary authority and revised down for a two unitary authority model due to forgone economies of scale.
4. An additional benefit has been calculated from removed District senior leadership posts, including on-costs.

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
Reduction in front office FTE	4%		Percentage reductions in line with previous local government spend reduction and reorganisation work and tested with the Sect 151 Officers.
Reduction in service delivery FTE	1.5%		
Reduction in back-office FTE	3%		
Senior leadership costs in Districts	£8,681,498		Senior leadership costs calculated for the top three tiers of leadership of District Councils including on-costs based on averages and no of Districts. Lower tiers are not included as they may be required as part of new organisational structures.

Key assumptions: Benefits of aggregation (Third Party Spend)

Element of the model



Methodology

1. The addressable third party spend combined between County and District Councils has been calculated using proportioned net expenditure to provide a baseline. Third party spend relating to property has been excluded.
2. A percentage reduction in third party spend has been applied due to the greater purchasing economies of scale that will be gained through consolidation.
3. These percentage reductions are higher for a single unitary authority and revised down for a two unitary authority model due to forgone economies of scale.

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
Proportion of net expenditure spent on third parties	65.7%		Calculated through publicly available RO forms.
Proportion of third party spend (TPS) which is addressable	75%		75% of the total third party spend is treated as addressable, due to some elements of third party spend being non addressable, eg. pass through costs. Previous experience in local authority third party spend analysis suggests that this typically makes up 25% of the spend
Reduction in third party spend	1.5%		Percentage reductions in line with previous local government spend reduction and reorganisation work and tested with the Sect 151 Officers.

Key assumptions: Benefits of aggregation (Property)

Element of the model

Property

Methodology

1. The combined net expenditure on property has been calculated using net expenditure figures for the County and District Councils.
2. This is spend relating to the ongoing running costs of office spaces such as those used in energy, cleaning and routine repairs rather than from the one-off sale of rationalised council office space. In addition, any benefits resulting from the rental of available office space has been excluded.
3. A percentage reduction has been applied to the property baseline to provide the estimate property benefit.

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
Proportion of net expenditure spent on property	3%		Proportion of spend is based on RO calculations. Percentage reductions in line with previous local government spend reduction and reorganisation work and tested with the Sect 151 Officers.
Reduction in property spend	12.5%		

Key assumptions: Benefits of aggregation (Democracy)

Element of the model

Democracy

Councillor allowances

Elections

Methodology

1. By aggregating Districts into one or two unitary authorities, fewer councillors will be required and therefore a saving can be made from base and special responsibility allowances. The average cost of a District council democratic structure has been estimated and multiplied by the number of District councils present within the boundary.
2. Consolidating local authorities will also reduce the number of elections required, thus presenting a benefit. The average annual cost of a District election has been calculated and multiplied by the number of District councils.
3. The calculation for both the single and two unitary model is the same, as the two unitary model also incurs an additional disaggregation cost of duplicating a larger, more expensive councillor structure than in District councils.

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
District SRA and base allowances incurred as part of the democratic structure	£351,915		Calculated through publicly available data.
Annual cost incurred per District election	£165,530		The annual cost of a District election has been calculated by multiplying the cost per vote and the average voter turnout during representative District Council elections. This has been divided by 4 to estimate the annual saving that can be achieved per council, and multiplied by the number of District councils inputted.
Cost per vote during an election	£3.00		The cost per vote used to calculate the cost of an election has been estimated at £3 by Government / Electoral Commission based on previous election data.

Key assumptions: Aggregation and Disaggregation costs (1 of 2)

Element of the model

Duplication

- Duplicated senior leadership
- Duplicating service delivery management
- Duplicated democratic structures

Methodology

1. The following costs of disaggregation only apply in the two unitary authority scenario. Two sets of senior leadership will be required to run two distinct authorities. This cost has been calculated using the costs of senior leadership at a representative council to tier three.
2. By disaggregating services that are currently county wide, for example Adults and Children's services, additional FTE will be required to account for lost efficiency. The amount of effort used in service delivery management & supervision has been used as a proxy to estimate the size of the increase required in a two unitary model.
3. The cost of a representative county democratic structure has been estimated as an additional cost incurred having two unitary authorities

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
Proportion of additional FTE undertaking service delivery management & supervision	0%		Additional costs have not been applied.
Additional senior leadership costs	0%		There is no additional cost as there are two senior leadership teams across existing top tier authorities
Members in upper tier local authorities	121		The existing number of top tier authority councillors across the area has been applied as an estimate and for the purpose for this financial analysis. Note: This does not represent a decision on the future number of Councillors.

Key assumptions: Aggregation and Disaggregation costs (2 of 2)

Element of the model

Duplication

- Duplicated senior leadership
- Duplicating county service delivery
- Duplicated democratic structures

Methodology

1. The following costs of disaggregation only apply in the two unitary authority scenario. Two sets of senior leadership will be required to run two distinct authorities. This cost has been calculated using the costs of senior leadership at a representative council to tier three.
2. By disaggregating services that are currently county wide, for example Adults and Children's services, additional FTE will be required to account for lost efficiency. The amount of effort used in service delivery management & supervision has been used as a proxy to estimate the size of the increase required in a two unitary model.
3. The cost of a representative county democratic structure has been estimated as an additional cost incurred having two unitary authorities

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
Member base allowance	£1,088,297		Calculated through publicly available data.
SRA costs per new unitary authority	£0		Two top tier unitary authorities already exist - there is no additional requirement based on the options currently under consideration.

Key assumptions: Costs of transition (1 of 4)

Element of the model

Transition Costs

- Redundancy costs
- Programme transition costs

Methodology

1. One off redundancy costs will be incurred when re-organising local authorities. These have been calculated as a proportion of the benefit resulting from FTE reductions and therefore is higher in a single unitary model than a two unitary model.

2. There are a number of transition costs that will be incurred when closing down existing local authorities and creating new authorities. In transitioning to a single unitary authority, these costs will only be incurred once, whereas in a two unitary model, many of these costs will be incurred twice.

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
Redundancy cost as a proportion of salary	30%		Percentage estimate in line with previous local government spend reduction and reorganisation work and tested with the Sect 151 Officers.
External communications, rebranding and implementation	£732,000	£366,000	Estimates in line with previous local government reorganisation work. For 1b & 1e x2 multiplier has been used.
External transition, design and implementation support costs	£8,540,000	£4,270,000	

Key assumptions: Costs of transition (2 of 4)

Element of the model

Transition Costs

- Redundancy costs
- Programme transition costs

Methodology

1. One off redundancy costs will be incurred when re-organising local authorities. These have been calculated as a proportion of the benefit resulting from FTE reductions and therefore is higher in a single unitary model than a two unitary model.

2. There are a number of transition costs that will be incurred when closing down existing local authorities and creating new authorities. In transitioning to a single unitary authority, these costs will only be incurred once, whereas in a two unitary model, many of these costs will be incurred twice.

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
Additional programme management costs of disaggregating services	£0		No disaggregation cost as a result of not breaking up the county. There is a potential change of service delivery by one UA, which may delivered by another UA in future.
Internal programme management	£3,806,400	£1,903,200	Estimates in line with previous local government reorganisation work. For 1b & 1e x2 multiplier has been used.
Creating the new council	£1,220,000	£610,000	

Key assumptions: Costs of transition (3 of 4)

Element of the model

Transition Costs

- Redundancy costs
- Programme transition costs

Methodology

1. One off redundancy costs will be incurred when re-organising local authorities. These have been calculated as a proportion of the benefit resulting from FTE reductions and therefore is higher in a single unitary model than a two unitary model.

2. There are a number of transition costs that will be incurred when closing down existing local authorities and creating new authorities. In transitioning to a single unitary authority, these costs will only be incurred once, whereas in a two unitary model, many of these costs will be incurred twice.

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
Contingency	£6,775,853		Estimates in line with previous local government reorganisation work. For 1b & 1e x2 multiplier has been used.
Organisation Closedown	£305,000		
Public consultation	£411,750	£274,500	

Key assumptions: Costs of transition (4 of 4)

Element of the model

Transition Costs

- Redundancy costs
- Programme transition costs

Methodology

1. One off redundancy costs will be incurred when re-organising local authorities. These have been calculated as a proportion of the benefit resulting from FTE reductions and therefore is higher in a single unitary model than a two unitary model.

2. There are a number of transition costs that will be incurred when closing down existing local authorities and creating new authorities. In transitioning to a single unitary authority, these costs will only be incurred once, whereas in a two unitary model, many of these costs will be incurred twice.

Assumptions applied

Area	*Key figures*		*Rationale*
	Options 1b & 1e	*Option 2 - City and County Council*	
Information, Communication & Technology (ICT) costs	£2,385,000		Estimates in line with previous local government reorganisation work. For 1b & 1e x2 multiplier has been used.
Shadow Chief Exec/ Member costs	£622,200	£311,100	

10. Appendix C:
Comparative Analysis

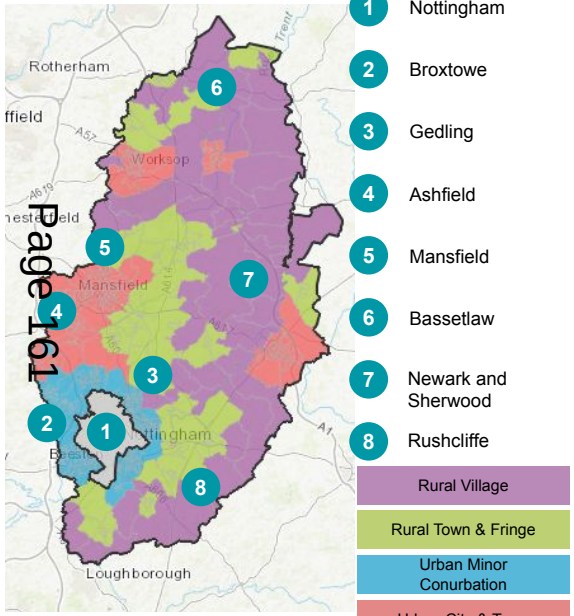
Summary view of comparative analysis for the three options

		Rural / urban	Time to key services	Debt to reserve per capita ratio	Social care demand to council tax take (current)	Social care demand to council tax take (projected)	Population	Deprivation	Housing need	Business Growth	Healthcare provision
1b	Nottingham City + Broxtowe + Gedling	34.4%	3.5	53.5	0.94	0.94	603,185	26.5	19.6	See detail on page 104	7,101
	Nottinghamshire with the remaining LAs			14.0	0.84	0.87	661,460	20.7	17.2		8,281
1e	Nottingham City + Broxtowe + Rushcliffe	18.3%	1.7	47.4	0.87	0.87	611,518	24.7	20.5	See detail on page 104	6,906
	Nottinghamshire with the remaining LAs			14.7	0.90	0.92	653,127	22.3	16.3		8,556
2	Nottingham City remains the same	30.4%	3.9	83.9	1.18	1.12	352,463	34.9	19.9	See detail on page 104	6,456
	Rest of Nottinghamshire becomes a new unitary authority			14.2	0.81	0.83	912,182	19.0	17.7		8,279

Options with lowest difference — Options with highest difference

Analysis: Rural-Urban comparative analysis (current)

The table below sets out the types of areas that exist across the Nottingham and Nottinghamshire geography and how this is reflected when combined in the different LGR options that are under consideration.



Average proportion of rural population

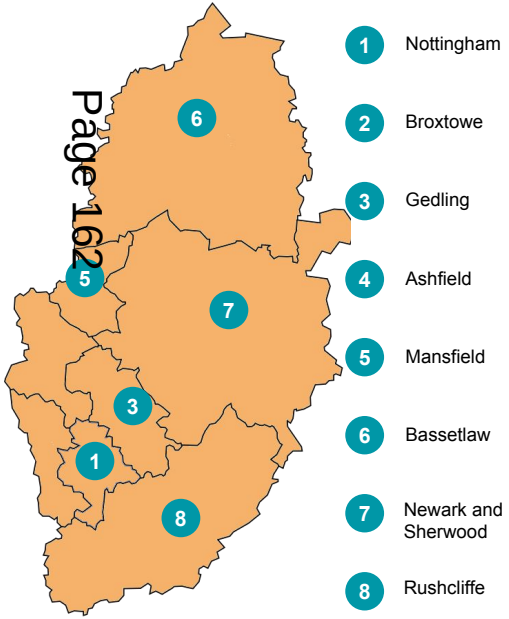
Department for Rural Affairs - Rural Urban Classification Map - Nottingham Observatory

Option		Rural %	Urban %	Difference between %'s
1b	Nottingham City + Broxtowe + Gedling	3.9%	96.1%	34.4%
	Nottinghamshire + Remaining LAs	38.3%	61.7%	
1e	Nottingham City + Broxtowe + Rushcliffe	12.4%	87.6%	18.3%
	Nottinghamshire + Remaining LAs	30.7%	69.3%	
2	Nottingham City	0.0%	100.0%	30.4%
	Nottinghamshire	30.4%	69.6%	

Key: Options that are most alike in rural / urban — Options that are least alike in rural / urban

Analysis: Time to key services analysis

This table highlights which of the potential options are the most equitable in time taken to travel to key services e.g. employment centres, primary schools, secondary schools, further education, GPs, hospitals, food retail and town centres.



Option		Time to key services via public transport / walking (min)	Difference between options (mins)
1b	Nottingham City + Broxtowe + Gedling	14.6	3.5
	Nottinghamshire + Remaining LAs	18.1	
1e	Nottingham City + Broxtowe + Rushcliffe	15.5	1.7
	Nottinghamshire + Remaining LAs	17.3	
2	Nottingham City	13.6	3.9
	Nottinghamshire	17.5	

Source: *Average time to key services (Public Transport/ Walking) Department of Transport Journey Time Statistics*

Key: Options with lowest difference — Options with highest difference

Analysis: Debt to Reserve per capita Ratio Analysis

Set out below are key components that underpin the debt-to-reserve per capita ratio analysis, as a potential indicator of relative financial health for each option.

Option		# of People (2023)	Total Debt (£000s, 24/25)	Total Reserves - (£000s, 23/24)	Debt per capita (£)	Reserves per capita (£)	Debt/Reserves per capita Ratio
1b	Nottingham City + Broxtowe + Gedling	561,011	£ 857,060	£ 16,029	£ 1,528	£ 29	53.5
	Nottinghamshire + Remaining LAs	612,759	£ 792,540	£ 56,611	£ 1,293	£ 92	14.0
1e	Nottingham City + Broxtowe + Rushcliffe	566,302	£ 846,248	£ 17,867	£ 1,494	£ 32	47.4
	Nottinghamshire + Remaining LAs	607,468	£ 803,352	£ 54,773	£ 1,322	£ 90	14.7
2	Nottingham City	329,276	£ 744,626	£ 8,877	£ 2,261	£ 27	83.9
	Nottinghamshire	844,494	£ 904,974	£ 63,763	£ 1,072	£ 76	14.2

Sources:
[1] Borrowing and Investment Live Tables, Q2 2024-25;
[2] ONS Estimates of the Population for England and Wales Mid-2023
[3] Revenue outturn summary 2023-2024

Key: Options with lowest difference — Options with highest difference

Analysis: Social Care demand to Council Tax take (current)

The analysis set out below below compares 2024/25 adult's and children's social care actual spend to council tax receipts in 2023/24 to gauge the potential strain on public services.

Option		Total ASC Spend (2024/25)	Total CSC Spend (2024/25)	Total Care Spend (2024/25)	Council Tax Receipts (2023/24)	Care to Council Tax Receipt Ratio
1b	Nottingham City + Broxtowe + Gedling	£ 164,626,206	£ 134,262,020	£ 298,888,226	£ 317,184,000	0.94
	Nottinghamshire + Remaining LAs	£ 206,418,792	£ 154,068,977	£ 360,487,769	£ 427,317,000	0.84
1e	Nottingham City + Broxtowe + Rushcliffe	£ 160,376,612	£ 132,493,533	£ 292,870,145	£ 335,799,000	0.87
	Nottinghamshire + Remaining LAs	£ 210,668,386	£ 155,837,464	£ 366,505,850	£ 408,702,000	0.90
2	Nottingham City	£ 92,476,000	£ 90,513,000	£ 182,989,000	£ 154,566,000	1.18
	Nottinghamshire	£ 278,568,998	£ 197,817,997	£ 476,386,995	£ 589,935,000	0.81

Sources:
[1] Nottingham City Council Budget Monitoring Report FY24/25;
[2] Nottinghamshire County Council revenue budget statement FY24/25
[3] Council Tax

Key: Options with lowest difference … Options with highest difference

Analysis: Social Care demand to Council Tax take (projected)

The analysis set out below below compares projected adult's and children's social care actual spend to projected council tax receipts to gauge the potential strain on public services.

Option		Total ASC Spend (2032/33)	Total CSC Spend (2032/33)	Total Care Spend (2032/33)	Council Tax Receipts (2032/33)	Care to Council Tax Receipt Ratio
1b	Nottingham City + Broxtowe + Gedling	£ 177,007,122	£ 160,455,544	£ 337,462,666	£ 359,340,174	0.94
	Nottinghamshire + Remaining LAs	£ 224,778,121	£ 184,126,692	£ 408,904,812	£ 470,435,575	0.87
1e	Nottingham City + Broxtowe + Rushcliffe	£ 173,402,244	£ 158,342,037	£ 331,744,281	£ 380,332,467	0.87
	Nottinghamshire + Remaining LAs	£ 228,382,999	£ 186,240,198	£ 414,623,197	£ 449,735,749	0.92
2	Nottingham City	£ 99,549,687	£ 108,171,414	£ 207,721,100	£ 186,281,960	1.12
	Nottinghamshire	£ 302,235,556	£ 236,410,822	£ 538,646,378	£ 647,928,338	0.83

Sources:
[1] 2024 England Taxbase - Taxbase data
[2] Tax Rate - Band D Council Tax Figures
[3] Nottingham City Council Budget Monitoring Report FY24/25;
[4] Nottinghamshire County Council revenue budget statement FY24/2

Key: Options with lowest difference … Options with highest difference

Analysis: Population

The table below compares current and forecasted population estimates for Nottingham and Nottinghamshire across the different options under consideration.

Option		Population (2023)	Population (2035)
1b	Nottingham City + Broxtowe + Gedling	561,011	603,185
	Nottinghamshire + Remaining LAs	612,759	661,460
1e	Nottingham City + Broxtowe + Rushcliffe	566,302	611,518
	Nottinghamshire + Remaining LAs	607,468	653,127
2	Nottingham City	329,276	352,463
	Nottinghamshire	844,494	912,182

Sources:
[1] ONS Estimates of the population for England and Wales Mid-2023

Key: Options with lowest difference … Options with highest difference

Analysis: Deprivation

This table summarises the key findings from analysis of the indices of deprivation, highlighting the areas of greatest need.

Option		Average deprivation score
1b	Nottingham City + Broxtowe + Gedling	26.5
	Nottinghamshire + Remaining LAs	20.7
1e	Nottingham City + Broxtowe + Rushcliffe	24.7
	Nottinghamshire + Remaining LAs	22.3
2	Nottingham City	34.9
	Nottinghamshire	19.0

Sources:
[1] English indices of deprivation 2019

Key: Options with lowest difference … Options with highest difference

Analysis: Housing Need

This table summarises the findings from the housing need analysis, identifying which option will see a greatest difference in the number of homes per 1000 of the population.

Option		Population (current)	Forecast new homes (2022-2027)	Forecast new homes needed per 1000 people (2022-2027)
1b	Nottingham City + Broxtowe + Gedling	561,011	11,000	19.6
	Nottinghamshire + Remaining LAs	612,759	10,510	17.2
1e	Nottingham City + Broxtowe + Rushcliffe	566,302	11,625	20.5
	Nottinghamshire + Remaining LAs	607,468	9,885	16.3
2	Nottingham City*	329,276	6,565	19.9
	Nottinghamshire	844,494	14,945	17.7

**Nottingham City figures reflect base need values. It excludes a 35% uplift.*

Sources:

[1] Assessment of Housing Need and Capacity in Nottingham City, Dec 2022

[2] Nottinghamshire County Council: Draft Housing Strategy 2023-2028

Key: Options with lowest difference … Options with highest difference

Analysis: Business Growth

The analysis sets out which would be the three largest areas of potential growth across each of the options based upon Gross Value Added (GVA) figures, coupled with the UK GDP growth seen over the last five years. This is intended to give an indication of which options might be able to grow economies and where that might be more challenging.There are new opportunities - such as the freeport - which are not yet captured in this data.

Option		Largest Sector		2nd largest		3rd largest	
		Sector	%	Sector	%	Sector	%
1b	Nottingham City + Broxtowe + Gedling	Wholesale & Retail trade	12.2%	Education	11.5%	Healthcare & Social Work	10.8%
	Nottinghamshire + Remaining LAs	Manufacturing	14.5%	Wholesale & Retail trade	11.7%	Real Estate	11.2%
1e	Nottingham City + Broxtowe + Rushcliffe	Wholesale & Retail trade	11.6%	Education	11.2%	Professional services	10.1%
	Nottinghamshire + Remaining LAs	Manufacturing	16.3%	Wholesale & Retail trade	12.5%	Real Estate	11.6%
1g	Nottinghamshire + Remaining LAs	Manufacturing	17.9%	Wholesale & Retail trade	12.0%	Real Estate	10.9%
2	Nottingham City	Education	13.7%	Healthcare & Social Work	12.4%	Wholesale & Retail trade	11.8%
	Nottinghamshire	Manufacturing	16.0%	Real Estate	12.1%	Wholesale & Retail trade	12.0%

Sector	UK GDP growth rates over last 2020-24 (5 years)
Healthcare & Social Work	34.5%
Education	34.1%
Professional services	26.3%
Wholesale & Retail trade	12.8%
Real Estate	3.3%
Manufacturing	-3.6%

While historical GDP growth rates may provide indications of future sectoral resilience, actual future economic performance may diverge due to various factors. This includes potential local growth drivers, such as the development of the East Midlands Freeport, Spherical Tokamak for Energy Production (STEP) programme and interventions from the strategic authority (EMCCA), could influence sectoral vulnerability and economic prospects.

Options with least vulnerable sectors

Analysis: Healthcare Provision

Set out below is a summary of the population numbers served per GP surgery in each of the options under consideration.

Option		Population (2023)	Number of GP surgeries (February 2025)	Number of people served per GP surgery
1b	Nottingham City + Broxtowe + Gedling	561,011	79	7,101
	Nottinghamshire + Remaining LAs	612,759	74	8,281
1e	Nottingham City + Broxtowe + Rushcliffe	566,302	82	6,906
	Nottinghamshire + Remaining LAs	607,468	71	8,556
2	Nottingham City	329,276	51	6,456
	Nottinghamshire	844,494	102	8,279

Sources:
[1] ONS Estimates of the population for England and Wales Mid-2023
[2] ONS Number of GP surgeries in local areas, England and Wales
[3] ONS Number of GPs per local areas, England and Wales

Key: Options with lowest difference … Options with highest difference

Cabinet **29 July 2025**

Report of the Portfolio Holder for Housing

Empty Homes Strategy 2025-2030

1. Purpose of Report

To update the Empty Homes Strategy in accordance with the Council's corporate priority - Housing – a good quality home for everyone.

2. Recommendation

Policy Overview Working Group is asked to RECOMMEND Cabinet to RESOLVE that the updated Empty Homes Strategy be approved.

3. Detail

The Council recognises the importance of bringing long term empty homes back into use and the attached document sets out the practical way the Council intends to do this, set in the strategic context. The Strategy aims to build on the work done and progress made as a result of the implementation of the Empty Homes Strategy 2020.The Strategy is contained in **Appendix 1** and the change table is attached in **Appendix 2** to highlight the key changes within the Strategy.

4. Key Decision

This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as it affects all wards in the Council's area.

5. Updates from Scrutiny

Policy Overview Working Group will make a recommendation on this policy.

6. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

There are no additional financial implications for the Council to consider at this stage. Whilst any prioritisation work would be within existing budgets, some of the options available, such as an empty dwelling management order or a compulsory purchase, would have additional resource implications. Any significant budget implications in the future, over and above virement limits, would require approval by Cabinet.

7. Legal Implications

   The comments from the Monitoring Officer / Head of Legal Services were as follows:

   Whilst there is no requirement to hold an Empty Homes Strategy, the Council does retain strategic housing responsibilities and this document helps towards continued delivery of its statutory duties. The Council's powers and duties in relation to enforcement are contained within various statutes including the Housing Act 1985, the Housing Act 2004, the Law of Property Act 1925 and the Acquisition of Land Act 1981. In cases where enforcement action is required, advice and input from Legal Services is always sought.

8. Human Resources Implications

   There were no comments from the Human Resources Manager.

9. Union Comments

   There were no Union comments.

10. Climate Change Implications

    The climate change implications are contained within the report.

11. Data Protection Compliance Implications

    This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    No equality impact assessment is required as this is a refresh of an existing policy with no significant changes in the approach taken.

13. Background Papers

    Nil.

Broxtowe Borough COUNCIL

Appendix 1

Empty Homes Strategy 2025 – 2030

July 2025

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1.0 Introduction

Empty homes in the Borough are a waste of a resource which, in a time of unprecedented demand for housing, could be better utilised by providing a home for someone to live in. Furthermore, an empty home can deteriorate over time and without intervention can cause wider negative impacts on an area such as having a negative impact on property values and amenity in the immediate neighbourhood as well as potentially attracting vermin and other anti-social behaviour, vandalism, fly tipping and potential squatting or other criminal activity. Empty homes also represent a risk for emergency services and put added pressure on council departments such as Planning Enforcement and Environmental Health.

Broxtowe Borough Council recognises the importance of bringing long-term empty homes back into use and the wider community benefits for local residents this can provide.

The Empty Homes Strategy 2025-2030 aims to build on the positive work already developed since the implementation of the original Empty Homes Strategy in 2010, to reduce the number of empty homes across the Borough. This document sets out the practical way the authority intends to do this.

2.0 Background to Empty Homes

2.1 What is an Empty Home?

A dwelling is defined as an empty home if it has been unoccupied for 6 months or longer. Privately owned empty homes are the focus of this strategy. However, concerns will be highlighted where an empty home owned by public bodies or housing associations (registered providers) requires attention.

Empty homes can be found in all areas, wards and locations across the Borough, and are not necessarily semi-derelict, boarded up or causing a problem.

At any given time, there will always be large numbers of empty homes around the Borough due to the natural flows and externalities of the housing market. This includes activity such as the buying and selling of homes, people and households relocating, property renovations, the process of resolving estates through probate, and short-term relocation for respite or other care. In most cases, these vacancies will be a short-term.

Whilst many properties are recorded as empty through their Council Tax accounts, it is also often the case that second homes, those that qualify for an unoccupied exemption, or even where a property is reported as occupied, can be referred to the authority as empty and unoccupied. All referrals, complaints and notifications are recorded and investigated as empty homes, until such

time that the Council's enquiries find that the property is in fact occupied or otherwise sufficiently used.

2.2 Why do properties become and remain empty?

There are a number of reasons why properties could become and remain empty over the longer term. These include:

- The property is difficult to sell or let due to its physical state and condition,
- It is currently being renovated, or the owner has plans to refurbish or develop the property,
- The owner does not have the capacity/finances/time/skills to manage or maintain the property or become a landlord,
- The property has been or is in the process of being repossessed,
- Probate – Where the previous owner has passed away, leading to an often-time-consuming administrative procedure,
- The owner is being cared for elsewhere, is in hospital or has been moved into a home/care,
- The property has been abandoned by the owner who now resides elsewhere,
- The property has been abandoned by the owner and the owner is untraceable,
- Land banking, when a property is left empty due to speculative investment, through acquiring a property,
- Inheritance, where probate has been granted and the beneficiary is yet to decide on future plans,
- Inheritance, where no arrangements have been made for succession,
- Where the property is adjoins, links to or forms part of a business, and the owner does not wish to let or sell,
- Where partners co-habit leaving the second property empty and they may choose not to sell the property or become a landlord,
- Older property owners moving into alternative accommodation for care or support needs, and they may choose not to sell the property.

It is important that the Council understands why individual properties become and/or remain empty over longer periods, along with the owner's circumstances and intentions, to tailor and deliver support and assistance appropriately.

2.3 Challenges presented by long term empty homes.

Dealing with an empty home is not always straightforward. Each property, its owner, their circumstances, and intentions are all unique. For example:

- A property may be used as a second home, and so not occupied on a permanent basis, but is still in use.
- Properties may be awaiting planning permissions and work is unable to commence whilst this is being sought. This may include specialist

permissions if they are a Listed Building or located in a Conservation Area.

- A property may be owned by a number of different people or companies who do not agree on how to use or dispose of it.
- The property may be subject to legal proceedings such as probate, divorce settlements or proceeds of crime (POCA) restrictions.
- Properties which have not changed/been subject to a mortgage since it became a requirement to register it, may not be registered with the Land Registry and information regarding the property will not be available from this source.
- It may not be immediately evident who the owner of a property is or where they are, as they may have moved away with little information available to trace them.
- Some properties are deliberately kept empty by the owner for specific reasons such as for their children when they leave home, elderly relatives who are in care or if they work or live away much of the time. Some are kept empty until the owner feels the housing market is suitable to sell the property at the price they want.
- The emotional attachment associated with a property, formerly a family home or owned by parents, can often lead to the reluctance or reticence to take action, or deal with a property immediately.
- There may be planning or other legal restrictions relating to how a dwelling can be occupied.

Some owners are often simply reluctant to engage with the Council and believe that as the property is privately owned the Council do not have the right to require action to return it to use. Owners may be unaware or have no concern for the affect the property has on the local area and surrounding properties. These are properties which are likely to be left empty for many years, fall into disrepair, and be the subject of future complaints and action.

Local Authorities have a range of professional experience across departments, legislative powers and tools at their disposal, the Council is able to provide a vehicle for a solutions-based approach that benefits all parties involved. As such, Local Authorities are considered to be best placed to tackle the issues that empty homes present.

2.4 Why long-term empty homes matter

The Council often receive complaints relating to long term empty homes from local residents, who rightly object to unsightly disused properties. There are resulting implications for the Council's Environmental Health, Private Sector Housing and Planning Enforcement teams etc. who have to use employee time and resources to investigate and intervene, deal with pests, general dilapidation, overgrown gardens, damage to neighbouring properties, anti-social behaviour and other issues.

Long term empty homes can have a direct impact on adjoining properties through issues such as damp and structural problems. Unsightly properties can be detrimental to neighbouring house prices and can result in a lack of

pride and investment in the area. The possibility of long-term empty homes attracting unwanted attention can cause anxiety and ongoing concern for local residents.

For owners of empty homes, leaving a property standing empty can become costly and be a source of unnecessary anxiety. By remaining empty and increasing in deterioration, the additional risk of vandalism and crime can lead to a property being difficult to insure, which could ultimately result in high repair costs or even mean a complete loss of asset.

Even the general deterioration of an unlived in property will result in costs. Deterioration by lack of maintenance, insurance, council tax and premiums, utility standing charges and mortgage payments, all increase the financial liability of leaving a property empty, and one which can often become insurmountable for the owners. By renting or selling the property, not only are the above issues resolved, but there is the added advantage of gaining regular rental income or the capital generated from the sale of a property.

There is also an environmental impact of leaving homes empty. It is more efficient and sustainable to make better use of existing dwelling stock available than to use new land (particularly if greenfield sites).

Empty homes returned to use as domestic dwellings increase the availability of homes, including potentially affordable homes. Instead of being a source of concern these homes can be transformed from a wasted resource into a home for an individual or family in housing need, reducing homelessness or overcrowding.

3.0 Context

3.1 Nationally

3.1.1 Empty dwellings in England

According to Government figures (Ministry of Housing Communities and Local Government Live Tables), in 2024, there were over 719,000 empty homes across England, with over 260,000 of these being empty properties that have been empty for more than six months. On average, approximately 2% of the housing stock is empty at any one time, though a certain level of empty properties is necessary to ensure the normal functioning of the housing market and the modernisation of existing housing stock.

In the East Midlands, the total number of empty dwellings in 2024 stood at over 64,000. In Broxtowe in 2024, there were over 1,400 empty dwellings and 466 long-term empty (for over six months) dwellings.

Table 1. Trends in Empty Dwellings Nationally, Regionally and Locally 2020 - 2024

Year	2020	2021	2022	2023	2024
Total Empty (England)	665,628	653,025	676,304	699,126	719,470
Total Empty (East Midlands)	58,109	57,315	59,581	61,698	64,609
Total Empty (Broxtowe)	1,358	1,311	1,377	1,339	1,433
Total Long-Term empty (Broxtowe)	598	500	530	495	466

("Long term empty" is a term applied to dwellings which have been unoccupied and substantially unfurnished for over 6 months)

The overall level of empty dwellings fluctuates year on year, but there has been an increase in recent years and generally Broxtowe reflects the national and regional trends.

3.1.2 Other central government action

The government has given local authorities, owners and developers many tools to help bring empty dwellings back into use. In recent years:

- All local authorities have been encouraged to publish an empty homes strategy.
- Reduced VAT is payable for certain eligible work on properties empty for two years or more.
- Empty homes brought back into use as affordable housing may qualify for funding in certain circumstances.
- Introducing new tools such as The Rating (Property in Common Occupation) and Council Tax (Empty Dwellings) Act 2018 has given local authorities the ability to increase the council tax levy payable in respect of a long term empty dwelling and new enforcement options such as the Empty Dwelling Management Orders (EDMOs) introduced under the Housing Act 2004, which enable local authorities to put a privately owned empty property back into use as housing. Local authorities are now, in effect, empowered to take over most of the rights and responsibilities of the owner of an empty dwelling and to refurbish and rent the property without becoming the titled owner.

3.2 Locally

The Council's Vision for Broxtowe is for 'A greener, safer, healthier Broxtowe where everyone prospers'.

3.2.1 Broxtowe Borough Council Corporate Plan 2024 - 2029

Our corporate priorities include:

- Housing – a good quality home for everyone.
- Environment – Protect the environment for the future.
- Community Safety – A safe place for everyone.

3.2.2 Broxtowe Borough Council Housing Strategy 2025 - 2028

This strategy includes strands to:

- Regulate Housing effectively and respond to housing needs,
- Facilitate adaptations to the homes of disabled people in the private sector,
- Regulate private sector housing through enforcement of relevant legislation.

(HSLocal_11) reports on the number of cases closed in the last 3 months where a property has been returned to occupation.

3.2.3 Other local initiatives

Broxtowe Borough Council has introduced a practice of differential charging on empty properties. This is another incentive for owners of empty dwellings to bring them back into use in a timely manner.

1 year	=	100% levy so 200% Council Tax charge
5 years	=	200% Levy so 300% Council Tax charge
10 years	=	300% levy so 400% Council Tax charge

The Council has also introduced an Acquisitions Policy with the aim of increasing Council owned social housing in Broxtowe. This can include consideration of empty dwellings that meet the criteria.

The Council has a policy on the buyback of ex-council houses, which is set out in the Right to Buy – Right of First Refusal and Discount Repayment Policy which may prevent ex-council houses becoming empty.

Other dwelling acquisitions through s106 agreements, compulsory purchase orders etc. are considered in appropriate circumstances.

4.0 Aims and Objectives

4.1 Overall aim

The overall aim of this strategy is to return long-term empty dwellings in the private sector back into use in the most appropriate way and in the shortest possible time.

4.2 Key objectives

The four key objectives are:

1. Maintain accurate information on the number, type and location of empty dwellings within the Borough, shared as appropriate with other Council Services

2. Raise awareness with owners of the issues of empty dwellings.

3. Proactively review all long-term empty dwellings for action. Identify a top five empty properties that have a significant, negative impact on the surrounding neighbourhood, and those that have been empty for more than two years.

4. Work in partnership with others to achieve the overall aim. Where necessary, utilising statutory powers to require work to be carried out and monitoring the use of discretionary provisions (e.g., differential Council Tax charging) as a means of discouraging properties from remaining empty.

4.3 Key tasks

In working towards the overall aim, a series of key tasks and actions have been formulated to meet the key objectives. These will be dependent on resources available and are as follows:

4.3.1 Objective 1

Maintain accurate information (as practicable) on the number, type and location of empty dwellings within the Borough.

Tasks/Actions

(i) Maintain a database of long-term empty dwellings,
(ii) Check ownership details prior to interventions being carried out,
(iii) Access Council Tax data to identify long term empty dwellings. The largest source of information received is through regular council tax data sharing, ensuring up to date information is obtainable. It is recognised that there may be a number of empty homes where full Council Tax is being paid, and the property has not been registered as being empty, or appear to be incorrectly rated and these will be referred back to Council Tax for further follow up as appropriate.

4.3.2 Objective 2

Raise awareness with owners of the issues of empty dwellings.

Tasks/Actions

(i) Work with owners of empty properties to raise awareness of the options available to them,
(ii) Promote information via the Council's corporate communications at least once annually and where possible to coincide with National Empty Homes week,
(iii) Maximise opportunities by signposting to other advice, if appropriate, to make homes greener and more energy efficient,
(iv) Provide, and regularly update, relevant information on the Council's website.

4.3.3 Objective 3

Proactively review all empty dwellings that have been empty for more than two years, identifying a top five that have a significant, negative impact on the surrounding neighbourhood or are already subject to other action by the Council (such as Planning, Building Control, Private Sector Housing or Environmental Health) or our partners (such as the Police/Fire Authority etc.) or enforcement or recovery action for Council Tax or work in default etc.

Tasks/Actions

(i) Identify a top five long term empty dwellings to prioritise the limited resources for action, on the properties with most negative impact.
(ii) Prioritisation will be predominantly on a "worst first" basis, using wider intelligence and may incorporate use of a scoring matrix (Appendix A) to rank properties that have been empty for more than 2 years.
(iii) Engage in concentrated activity to target the five properties identified.

4.3.4 Objective 4

Work in partnership with others to achieve the overall aim. Where necessary, utilising statutory powers to require work to be carried out.

Tasks/Actions

(i) Liaise with Council Tax section to check and update records on properties known as empty or to be second homes to ensure the correct rate of Council Tax is being charged.
(iv) Maintain empty homes reporting tool on the Council's website.
(v) Provide advice and assistance to those wishing to purchase or dispose of empty dwellings.
(vi) Liaise with the Housing Division to identify properties which may be eligible for purchase using the "Acquisitions Policy."

(vii) Prepare bespoke action plans in respect of individual properties. This may include use of tracing organisations to assist with identifying and tracing owners of long-term empty dwellings.

(viii) Participating in multi departmental/agency empty homes panels to ensure appropriate coordination and review of the response to individual properties.

Where necessary, statutory powers to require appropriate work to be carried out will be utilised. Whilst these powers are not specifically aimed at bringing the properties back into use, they may contribute to an owner reviewing their decision to keep the property empty.

5. Our Approach

Implementation of the Empty Homes Strategy is carried out within existing resources and will be influenced by other service demands.

5.1 Starting point – Identify.

The process of bringing a long-term empty home back into use begins with correctly identifying empty dwellings and those which are believed to be long-term empty forms the starting point of the Council's approach.

The first step is identifying the location of the empty dwelling and the owner. This is not always as straightforward as it sounds – a rundown property may appear empty, but is actually someone's home, whereas a tidy house with curtains up may have been empty for years. The most useful way the Council has of gathering information about empty dwellings is through council tax records. Permission to use this information was introduced in the Local Government Act 2003 which allowed local authorities, for the first time, to use council tax information for: 'identifying vacant dwellings and taking steps to bring vacant dwellings back into use.' Members of the public also report individual properties which they believe to be empty. Other Council teams provide information about possible empty properties. This all provides valuable information and helps to build up a detailed picture of the situation in Broxtowe.

Other than council tax records, officers also liaise with Environmental Health, Planning, and Building Control, talk to neighbours, conduct Land Registry searches and check with the Probate Office, where appropriate.

Once the owner is identified, the Council will contact them and try to work with them in bringing the dwelling back into use and understand the causes of the property being empty long-term. The reasons why people leave property empty can vary enormously. Sometimes there are sensitive issues, for example a property where the owner has gone into residential care and has expectations of returning, or where a property is the subject of probate or a legal dispute where action cannot be taken until the matter is concluded.

Prioritising action on properties will be dependent on a number of factors and may utilise the scoring matrix in addition to an assessment of other intelligence and local circumstances.

5.2 Encourage

The Council will work with the owner offering advice and assistance, with the intention of bringing the property back into use through voluntary action on the owner's part in a timely manner.

Owners should know that whilst the Council would prefer to work with them, enforcement action is always an option and by owning a property, they have a responsibility for it and must act accordingly.

Contact escalates in seriousness from the first informal advice letter to a final warning actively presenting the possibility of enforcement action being taken to ensure the property is returned to use. If initial letters are unsuccessful then visits will be carried out in an attempt to engage with property owners and provide bespoke support. This work can be time consuming, but its success often reduces the need for further enforcement action. If this approach fails to produce the desired outcome, it provides additional information on the condition of the property and the other relevant information which may be required to justify a higher matrix score or further legal action.

5.3 Enforce

Enforcement action will be considered where a dwelling has been empty for at least two years and where it is considered that the dwelling is unlikely to be brought back into use because engagement is lacking or all other negotiations or progress on agreed actions has failed.

In identifying priority for further formal action in light of limited resources, consideration will be given to whether any other action is in progress – such as dealing with vermin, unsafe structures, overgrown properties etc. and any enforcement action will be considered in accordance with the Council's Enforcement Policy.

In determining the most appropriate course of action to bring a long-term empty dwelling back into use, consultation will also be undertaken with officers from Environmental Health, Planning, Building Control, Revenues and Legal etc. as appropriate. For the top five cases, a panel comprising of the above may be held with a Lead Officer appointed depending on which department is already pursuing enforcement action or are best placed to use the relevant powers available. Many of the other enforcement options will not directly result in the property being brought back into use but will address any more immediate concerns present.

Other Enforcement Options

Various enforcement options are available, and include:

Compulsory Purchase Order (CPO)
Compulsory Purchase of a dwelling carried out under section 17 of the 1985 Housing Act or under section 226 (as amended by Planning and Compulsory Purchase Act 2004) of the Town and Country Planning Act 1990. This allows local authorities to acquire property for the provision of housing or to make a quantitative or qualitative improvement to existing housing.

A CPO is the final solution to a problem empty property as it removes ownership from the current owner. Once the CPO is approved, the Council would arrange the sale of the property, preferably to a Housing Association partner, to develop as affordable housing. If this is not financially viable, the property will be sold on the open market subject to covenants ensuring the refurbishment and reoccupation of the property. Where the Compulsory Purchase Order process is used, the ex-owners will be entitled to compensation once the Council becomes the owner of the property.

Empty Dwelling Management Order (EDMO)
Available under section 133 of the Housing Act 2004, an EDMO can be made where an owner leaves a property empty and has no intention of securing its voluntary reoccupation. The Council and a partner agency undertake the management of a property (including carrying out works if applicable) and renting it out for a period of up to seven years, with the EDMO reviewed after that time, when it could return to the same owner that left ot vacant and neglected in the first instance. Management costs and any refurbishment costs can be reclaimed from the rental income with any excess going to the owner.

There are currently limited examples of EDMOs in the country, with only 38 reported to have been secured since 2010. EDMOs are open to appeal at any stage and can be administratively burdensome.

Enforced Sale
Enforced Sale can be used for those properties that have charges raised against them following statutory improvement works where the property remains empty and is causing a significant nuisance to the surrounding area. The debt is marked as a caution on the land registry certificate at HM Land Registry and the local authority serves a Law of Property Act 1925 section 103 notice on the owner. The property is sold at auction and the cost of statutory works undertaken in default by the local authority, administration costs, and Land Registry fees for the Enforced Sale can be recovered from the sale. Enforced Sale can only be used where there is a debt to the local authority that can be registered as a statutory change on the property or where a County Court has awarded an interim or final charging order for personal debts such as Council Tax.

Additional Statutory Powers
These are powers which may be used to deal with specific issues arising from long-term empty dwellings as appropriate.

Town and Country Planning Act 1990, Section 215
Where a property is having a detrimental impact on the amenity of an area, a notice under section 215 of the Town and Country Planning Act 1990 may be served requiring the owner to address the unsightly external appearance. Where an owner fails to comply with such a notice, the Council may undertake the works in default and make a charge against the property.

Not only can the use of section 215 notices improve the amenity of an area, but they can also be used for the basis of an enforced sale.

Local Government (Miscellaneous Provisions) Act 1982, Section 29
This allows the local authority to secure an empty property against unauthorised access or to prevent it from becoming a danger to public health. While not a long-term solution to empty properties, it is a useful short-term measure to deal with immediate issues.

Building Act 1984, Section 59:
Where the condition of the drainage to a building is prejudicial to health or a nuisance.

Building Act 1984, Sections.77 and 78
Where an empty home is in such a condition to be dangerous or is seriously detrimental to the amenity or of the neighbourhood. This applies to dangerous or dilapidated buildings and requires the owner to make the property safe or enable the local authority to take emergency action to make it safe.

Building Act 1984 Section.79
Requires the owner to address the property adversely affecting the amenity of the area through its disrepair.

Prevention of Damage by Pests Act 1949 Sections 2-7
Requires the owner to take steps to clear the land of vermin and/or requires the owner to remove waste likely to attract vermin or gives the local authority the power to do so.

Environmental Protection Act 1990 Sections 79-81
Requires the owner to abate the nuisance or prevent its recurrence or gives the local authority the power to do so.

Housing Act 2004 Part 1:
Housing conditions, improvements and enforcement. While this may not be the first choice of action, it is an option which may be available.
Housing Act 1985

The power to place a demolition order on a dwelling where category 1 hazards exist, under the provisions of the Housing Health and Safety Rating System, and demolition is considered to be the most satisfactory course of action. The owner of the dwelling is responsible for its demolition and then retains ownership of the land.

Where a number of dwellings within the same area are considered suitable for demolition, the local authority can declare a Clearance Area. This results in purchase and demolition of the properties by the local authority which then owns the land.

Housing Act 1985 Section 17 and the Acquisition of Land Act 1981
Forms the basis for the compulsory purchase of land/buildings for the provision of housing accommodation.

Housing Act 2004 Part 4
Grants powers to take over the management of a property using Empty Dwelling Management Orders (EDMO).

Law of Property Act 1925, Part III
The basis for enforced sale where certain debts are owed to the Local Authority.

The Anti-Social Behaviour, Crime and Policing Act 2014, Part 4
Allows for enforcement of matters considered to be detrimental to the quality of life to those in the locality.

Public Health Act 1961 Section 34
Deals with the removal of waste from property or land.

Public Health Act 1936 Section 83
Deals with the cleansing of filthy or verminous premises.

6. Achievements

Since the refresh of the Empty Homes Strategy in 2020, Broxtowe Borough Council has achieved the following:

- Established ownership details of all known long term empty dwellings.
- Produced a procedural guide for dealing with empty dwellings.
- Produced a list of contacts and agencies to assist in tracing owners.
- Produced a web-based empty dwelling referral form for use by the public.
- Participated in local Private Sector Landlords' Forums and promotion of information and local events for Landlords.
- Maintained regular updates on the Council's website to provide up to date information on empty dwellings.
- Reviewed the priority scoring matrix (this may be further refined in the interim).

- Brought 110 long term empty dwellings back into use as follows:

Year	2020/21	2021/22	2022/23	2023/24	2024/25
	28	25	26	13	18

This includes four out of the Top five we have identified for priority action.

7. Strategy Review

The Strategy will be reviewed at least every five years or sooner if required by legislative changes.

8. Document History and Approval

Date	**Version**	**Comments**
2010	Policy Created	
2015 and 2020	Updated	
2025	Updated	Cabinet July 2025

Appendix A: Empty Homes Priority Scoring Matrix

Each home which has been empty for more than two years will be assessed using a priority scoring matrix which considers various criteria. The result of this assessment is that the property will be placed in a category determining the priority level given for further action, where resources allow or be used to identify a top five Private Sector dwellings to implement a plan to return to occupation.

Properties will be reassessed when necessary / new information is obtained to ensure they remain situated in the correct categories and the correct level of priority is given. The categories will be classified as follows:

RED – (scores 55 or over)

Cases which fall into this category will be prioritised. All avenues will be explored with the owner to return their property to use in a way that suits their own needs, the needs of the community and the Council. Where assistance is refused and the owner is unwilling to cooperate, all enforcement options will be considered to establish the most appropriate course of action.

AMBER - (scores 31 - 54)

Cases which fall into this category will be considered a lower priority than those in the red category. Resources will still be invested in these cases and officers will work with owners in an attempt to prevent empty homes from deteriorating and being reassessed to a higher category. Where necessary, enforcement options will be employed if considered the most appropriate course of action. Cases in this category will be monitored on a more frequent basis than those properties which fall within the green category and will be reassessed where necessary.

GREEN - (scores less than 30)

Cases which fall into this category will be given a lower priority for action, but owners will be contacted and offered any assistance they may need to return their property back into use. These properties will be monitored for any change and reassessed where necessary.

Empty Homes Assessment Scoring Sheet
Listed within Criteria showing classification and score.

Time Empty

- Less than 1 year = 0
- 1 to 2 years = 5
- 2 to 5 years = 10
- 5 to 10 years =15
- Over 10 years = 20

Location

- Extremely isolated with no access = 0
- Isolated property with access = 5
- Rural residential area = 10
- Urban residential neighbourhood = 15
- Prominent position = 20

Special Interest

- Listed Building = 10
- Located in a Conservation Area = 5

General Condition

- Well maintained = 0
- Acceptable for surrounding area = 5
- Noticeably empty/unattractive/overgrown = 10
- Extremely unsightly/detrimental to the area = 20

Unwanted Attention

- Attracting criminal activity such as graffiti, fly tipping, vandalism, anti-social behaviour = 20

Debts Owed to Broxtowe Borough Council

- No outstanding monies owed = 0
- Less than £500 = 5
- £500 to £2,000 = 10
- £2,000 to £5,000 = 15
- Over £5,000 = 20

Owner Interaction

- High level of cooperation = 0
- Average level of contact and efforts made = 5
- Minimal contact & little efforts made = 10
- No contact/untraceable/no efforts made = 20

Additional Factors

- Property is attached (semi-detached/terraced/flat) and in disrepair or insecure with a significant impact on adjoining occupiers = 5
- Property is insecure at ground level with evidence of unauthorised access = 5
- Active Statutory Notices in place (Planning/Building Control/Accumulations/Vermin/Statutory Nuisance) etc. = 5

Appendix 2

Section	Suggested Change	Reason for Change
Title	Dates updated	Refreshed Strategy
Whole Document	Format	To tidy and update
Achievements	Revised information	More up to date statistics
Chapter 2	Revised objectives Changed order of objectives	Updated with more detail To reflect actual practice in a more logical order
3.1.1 national context	New table	Showing local trends over the last 5 years
3.2.3	Council tax levy	Update to reflect local changes
6 achievements	Changed position in strategy and added breakdown of data for the last 5 years	To be more informative

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Cabinet **29 July 2025**

Report of the Portfolio Holder- Economic Development and Asset Management, Portfolio Holder- Housing

Asset Management Strategy - introduction and 'compass'

1. Purpose of Report

The Asset Management Strategy is in the process of being refreshed in accordance with the Council's Corporate Priority of Housing – a good quality home for everyone.

2. **Recommendation**

Cabinet to RESOLVE to approve the Asset Management Strategy introduction and 'compass.'

3. Detail

Two key objectives within the Corporate Plan are to:

- Build more houses, more quickly on under used or derelict land
- Invest to ensure our homes are safe and more energy efficient.

The Asset Management Strategy (AMS) is currently being refreshed and will be submitted to Cabinet in September. The strategy will set out how we plan to fully utilise assets held within the Housing Revenue Account (HRA), how all Council housing will achieve the Decent Homes Standard and how all dwellings are to meet climate standards.

The core objectives of the strategy will be shaped by the AMS 'Compass', a bite-sized document that identifies the key results that are designed to meet the Corporate Plan objectives and Housing Strategy actions.

Appendix 1 includes an introduction, which sets the scene for the upcoming AMS. **Appendix 2** includes the 'Compass'.

4. Key Decision

This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, as it will result in in the Council incurring revenue or capital expenditure or savings of £250,000 or more and be significant in terms of its effects on communities living or working in an area comprising two or more Wards or electoral divisions in the Council's area.

5. Updates from Scrutiny

This report has been considered by the POWG on 03/07/25 and was recommended to Cabinet.

6. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

There are no additional financial implications to consider at this stage with current activities being contained within existing capital and revenue budgets. Any significant budget implications going forward, over and above virement limits, would require approval by Cabinet.

The Deputy Chief Executive and Section 151 Officer will continue to work closely with the Asset Management and Development team, in considering revenue and capital budgets requirements as part of the annual budget setting process. It is vital that the ambitions of the Council in terms of its Asset Management Strategy are carefully managed, and the financial risks mitigated and incorporated into the Council's Medium-Term Financial Strategy.

7. Legal Implications

The comments from the Monitoring Officer / Head of Legal Services were as follows:

The purpose of an Asset Management strategy is to ensure that the Council uses and manages its housing stock to meet its needs and objectives. It is good practice for the Council to have an Asset Management strategy. The Council has a statutory duty under Section 8 of the Housing Act 1985 to consider housing conditions in its district and the needs of the district with respect to the provision of housing accommodation. The regulator of social housing derives its powers from the Housing and Regeneration Act 2008 and one of its stated objectives is to undertake economic regulation of providers of social housing, focusing on governance, financial viability, and value for money. Additionally, there are various statutory and regulatory obligations that the Council must comply with.

8. Human Resources Implications

The comments from the Human Resources Manager were as follows:
Not applicable.

9. Union Comments

Not applicable.

10. Climate Change Implications

    The climate change implications are contained within the report.

11. Data Protection Compliance Implications

    This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    As this is a change to policy / a new policy an equality impact assessment is included in the appendix to this report.

13. Background Papers

    Nil.

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Appendix 1

Introduction

Guided by its GREAT values – Going the extra mile;, Ready for change, valuing Employees, always improving, and being Transparent – this is not just another strategy document destined for a dusty shelf. This is our unshakeable commitment to the people of Broxtowe. It is a declaration of intent, forged from a deep understanding of our communities and a passionate drive to deliver not just houses, but high-quality, secure, and truly affordable homes that form the bedrock of thriving lives. We understand that the right home is transformational—it impacts health, wellbeing, opportunity, and the very fabric of our community.

We own our housing stock, a rare and precious position that comes with profound responsibility. We refuse to simply manage decline or tinker at the edges. Our ambition is clear: to lead, to innovate, to act with entrepreneurial urgency, demonstrating we are ready for change and committed to Going the extra mile, and to actively drive forward the provision of outstanding social housing that meets the real, evolving needs of our residents - now and for generations to come. We will overcome obstacles, cut through delays, and find creative solutions because the human cost of inaction is too high.

We recognise the challenges: an aging population requiring adaptable and accessible homes, the urgent need for decarbonisation, and the imperative to ensure genuine affordability through social rents linked to our local economic reality. But we see these not as obstacles, but as catalysts for action. Driven by our value of always improving, this strategy outlines how we will tackle these head-on, investing wisely, building intelligently, spotting opportunities, and replacing housing that no longer serves its purpose with modern, efficient homes—sometimes on the same footprint, sometimes increasing provision where possible.

This plan is our roadmap for delivery. It demands collaboration across the council and with our partners—breaking down silos to achieve shared goals, recognising that our valued employees are key to this success. It requires data- driven decisions balanced with social value, acting with Transparent clarity and never losing sight of the people behind the numbers. It mandates innovation, a relentless focus on quality and tenant satisfaction, and the agility to seize opportunities as they arise.

We are not just maintaining assets; we are investing in people. We are building homes where families can flourish, where older residents can live with dignity, and where our communities can grow stronger. This is our purpose. This is our pledge. This strategy details how we will make it happen, quickly and effectively.

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Appendix 2

Objective 1: Delivering More Homes People Need, Imaginatively and Effectively

Key Results

- **KR 1.1** (Annually from Oct 2025): Achieve ambitious annual net increases in socially rented and shared ownership homes. This will be targeted towards meeting the most critical housing needs (identified by household type, circumstance, or required property specification) highlighted in our housing analysis processes.

- **KR 1.2** (Annually from Oct 2025): Utilise the budget allocated for opportunistic acquisitions to secure [e.g., 25] new homes per year. Achieved through opportunistic and innovative routes (off-market acquisitions, creative partnerships, proactive site identification, and non-standard S106 opportunities), beyond standard planned new build programmes. To include [e.g., 80%] social rents and [e.g., 20%] shared ownership homes.

- **KR 1.3** (Annually from Oct 2026): Deliver adaptable/accessible homes that meet 100% Nationally Described Space Standards (NDSS) for Homes England grant requirements and Employer's requirements. This will contribute to a demonstrable reduction in waiting list numbers for these homes.

- **KR 1.4** (Annually from Oct 2026): Achieve a year-on-year improvement in tenant satisfaction with the overall quality and design detail of their new home. This to be measured via targeted post-occupation surveys and qualitative feedback sessions focusing on how the home meets their daily living needs.

- **KR 1.5** Secure external grant funding for new build Affordable Homes towards housing delivery, aiming for approximately [30-40%] of total scheme costs, by [Date].

- **KR 1.6** (Quarterly from Oct 2025): Working with Housing to dynamically monitor and strategically respond to Right-to-Buy impacts, ensuring effective reinvestment strategies are in place.

Objective 2: Ensuring Every Home is Safe, Healthy, and Fit for the Future

Key Results (KRs)

- **KR 2.1** (By Oct 2027): Proactively and collaboratively reduce structural damp cases by [e.g. 10%] from the Oct 2025 baseline, tackling the root causes and creating healthier homes.

- **KR 2.2** (From Oct 2025): Provide rapid and effective assessment (investigation, advice, support, referrals, remedial work) and clear action plans for 100% of mould reports in accordance with timescales in Awaab's law, prioritising tenant health and well-being.

- **KR 2.3** (From Oct 2025): Support Housing to achieve consistent annual improvement in overall tenant satisfaction with the quality of their home and the responsiveness and quality of repairs. To be evidenced by improved satisfaction survey results, a demonstrable reduction in repeat repairs and related complaints, and an increase in positive feedback/compliments.

- **KR 2.4** (From Oct 2025): maintain uncompromising 100% statutory landlord safety compliance. Achieved by proactively addressing any access challenges and supporting Housing to ensure tenant safety.

- **KR 2.5** (From Oct 2025): Ensure every home meets or exceeds Decent Homes standards throughout the tenancy, providing a quality experience for our tenants.

- **KR 2.6** (By Oct 2026): Implement an evidence-based, sustainable component lifecycle policy balancing cost, quality, lifespan, and environmental impact. This will set the rules for when components are to be replaced, balancing cost, quality, life, and environmental factors.

- **KR 2.7** (Annually from [e.g. Oct 2026]): Achieve average unit costs for key planned works components (e.g., kitchens, bathrooms, roofs) that fall within the top quartile when benchmarked against national/sector comparators. This is to measure how efficiently we complete the replacement work compared to others.

- **KR 2.8** (Annually from [e.g. Oct 2026]): Achieve a year-on-year reduction of [e.g. 10%] in the average waiting time from assessment to completion for major adaptations.

- **KR 2.9** (Annually from [e.g. Oct 2026]): Work collaboratively and proactively with Housing to achieve a year-on-year reduction of [e.g. 10%] in the average number of reactive repair requests logged per property**.**

Objective 3: Transforming all Stock into Homes Fit for Modern Lives, Sensitively and Efficiently

Key Results (KRs)

- **KR 3.1** (By Oct 2028): Accelerate the average asset replacement cycle time by 15% from the Oct 2026 baseline, delivering improvements faster

- **KR 3.2:** Establish and implement property investment thresholds and decision criteria that ensure strategic resource allocation, preventing over-investment in individual assets while maximizing overall portfolio value and tenant outcomes.

Objective 4: Creating Warmer, Energy Efficient and More Affordable Homes for a Sustainable Future

Key Results (KRs)

- **KR 4.1** (By Oct 2030): Achieve EPC Band C or above for 100% of technically and economically viable homes, delivering warmer homes and lower energy bills for our tenants.

- **KR 4.2** (By Oct 2026): Establish clear, ambitious interim carbon reduction milestones aligned with the Carbon Management Action Plan and Council climate commitments.

- **KR 4.3** (By Oct 2026): Commence impactful Phase 1 implementation of the actions aligned to the Carbon Management Action Plan demonstrating early progress.

- **KR 4.4** ([e.g. Oct 2026]): Secure external grant funding of at least [e.g., £530k] per year specifically for the decarbonisation of existing Council Housing stock, contributing to the implementation of the decarbonisation roadmap.

Objective 5: Unlocking Potential: Empowering Tenants, Staff, and Innovation for Better Services

Key Results (KRs)

- **KR 5.1** (By Oct 2027): Once implemented, increase uptake of accessible digital-first services (e.g. interaction with capital works team) by [e.g. 10%], whilst actively demonstrating improved tenant satisfaction with digital access, choice, and support.

- **KR 5.2** (From Oct 2025): Systematically use Asset Management Strategy (AMS) activities, investments, and associated data (quantitative and qualitative) to demonstrate measurable positive impacts on specific, co-defined aspects of tenant well-being, health outcomes, and community connection, sharing these positive stories internally and externally.

Objective 6: Using Insightful Data to Drive Action and Improve Lives

Key Results (KRs)

- **KR 6.1** (By Oct 2026): Achieve 95% coverage of accurate, insightful, and readily accessible stock condition data. To be integrated with validated repairs and tenant feedback data, which will provide the foundation for smart decisions.

- **KR 6.2** (By Oct 2026): Fully operational real-time AMS data dashboard and asset lifecycle system visualising key performance indicators (informed by KR 6.1) providing actionable insights for teams.

- **KR 6.3** (From Oct 2026): Embed quarterly data-driven review meetings (using KR 6.2 dashboard) that demonstrably integrate quantitative performance data with qualitative tenant feedback and staff insights. This will lead to timely strategic and operational adjustments focused on improving both service efficiency and the tenant experience.

- **KR 6.4** (Annually from Jan 2027): Generate and act upon at least [e.g., 5] significant actionable insights per year derived from the integrated analysis of

asset, repairs, financial, and qualitative tenant feedback data. This will lead to demonstrable service improvements or strategic shifts.

- **KR 6.5** (Annually from Oct 2026): Achieve a year-on-year reduction of [e.g. 5%] in upheld complaints related to asset management issues (quality, planned works, contractor performance, property condition) and a simultaneous year-on-year increase of [e.g. 10%] in recorded compliments for AMS activities.

Cabinet **29 July 2025**

Report of the Portfolio Holder - Economic Development and Asset Management

Housing Delivery Plan

1. Purpose of Report

The Housing Delivery Plan is in the process of being refreshed in accordance with the Council's Corporate Priority of Housing, a good quality home for everyone.

2. Recommendation

Cabinet is asked to RESOLVE to approve the Housing Delivery Plan.

3. Detail

The Housing Delivery Plan is being refreshed (alongside the Asset Management Strategy), following consultation. This document highlights recent achievements with regards to adding to the HRA housing stock (including delivering 57 more units than our initial targets over the past three years), the methodology for how the Council will build or acquire more housing going forward and the risks associated with this. The **Appendix** includes the latest version of the Housing Delivery Plan.

4. Key Decision

This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as it could result in in the Council incurring revenue or capital expenditure or savings of £250,000 or more and be significant in terms of its effects on communities living or working in an area comprising two or more Wards or electoral divisions in the Council's area.

5. Updates from Scrutiny

Policy Overview Working Group RECOMMENDED the Housing Delivery Plan be approved at it's meeting on 3 July 2025.

6. Financial Implications

The comments from the Head of Finance Services were as follows:

There are no additional financial implications to consider at this stage with current activities being contained within existing capital and revenue budgets. Any significant budget implications going forward, over and above virement limits, would require approval by Cabinet.

The Deputy Chief Executive and Section 151 Officer will continue to work closely with the Asset Management and Development team, in considering revenue and capital budgets requirements as part of the annual budget setting process. It is vital that the ambitions of the Council in terms of its Asset Management Strategy are carefully managed, and the financial risks mitigated and incorporated into the Council's Medium-Term Financial Strategy.

7. Legal Implications

The comments from the Monitoring Officer / Head of Legal Services were as follows:

The Council has a statutory duty under Section 8 of the Housing Act 1985 to consider housing conditions in its district and the needs of the district with respect to the provision of housing accommodation. The regulator of social housing derives its powers from the Housing and Regeneration Act 2008 and one of its stated objectives is to undertake economic regulation of providers of social housing, focusing on governance, financial viability, and value for money. Additionally, there are various statutory and regulatory obligations that the Council must comply with.

8. Human Resources Implications

Not applicable.

9. Union Comments

Not applicable.

10. Climate Change Implications

The climate change implications are contained within the report.

11. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

Not applicable.

13. Background Papers

Nil.

Appendix

Housing Delivery Plan 2025 – 2030

Author: Fraser Neasham
Division: Asset Management & Development
Date: 03/06/25
Review Date: 02/06/26

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1. Executive Summary

Broxtowe Borough Council has successfully delivered its ambitious housing plan established in 2019, exceeding original targets and establishing a proven track record of delivery. A fundamental driver of this success is the commitment to achieving a net gain in council-managed housing stock year-on-year, particularly in the face of Right to Buy pressures. Building on this, our Housing Delivery Plan sets out the approach for the next five years (2025-2030) to deliver up to 250 new affordable, high-quality homes for our residents. This aligns with the objective within the Asset Management Strategy to deliver 'more homes people need, imaginatively and effectively'.

Our previous plan aimed to deliver 230 homes over ten years - a target we have not only met but exceeded, delivering 57 more units than our initial targets over the past three years. This achievement demonstrates our commitment to addressing local housing need and our ability to deliver tangible results for our communities.

The plan for 2025-2030 builds on proven delivery methods while addressing the changing housing landscape. Our approach focuses on three core delivery mechanisms: new build development on council-owned sites (particularly underused garage sites), strategic open market acquisitions of former council houses, and selective engagement with Section 106 opportunities where we serve as provider of last resort.

Key achievements that underpin this new plan include continuing to establish the development department, securing significant external funding partnerships with Homes England and the Local Authority Housing Fund, and building a robust pipeline of schemes across the borough. We have developed expertise in navigating complex development processes and established valuable relationships with contractors, developers, and funding partners. Beyond immediate delivery, this plan contributes to the long-term sustainability of the Housing Revenue Account (HRA) through increased rental income, bolstering the Council's financial position.

Our ambitious target of 250 homes over five years represents an average of 50 homes annually, with estimated total investment of £45-£62.5 million. This will be funded through a strategic mix of grant funding (our primary source), Section 106 contributions (managed through improved inter-departmental protocols), Right to Buy receipts, and prudential borrowing as necessary. The plan prioritises maximising grant income to reduce borrowing requirements and ensure scheme viability.

The plan acknowledges key risks including construction cost inflation, interest rate volatility, and internal capacity constraints. Addressing staffing challenges is a critical priority, with immediate need for permanent leadership and an experienced development officer to ensure sustainable delivery. Improved coordination of Section 106 funding flows between departments is also a key operational priority.

This plan positions Broxtowe Borough Council to continue its leadership in affordable housing delivery, providing homes that meet identified local needs while maintaining financial sustainability and building on our established reputation for successful project delivery.

2. Strategic Alignment: Guiding Objectives for Housing Delivery

This Housing Delivery Plan for 2025-2030 is directly aligned with the emerging Asset Management Strategy (AMS). The AMS establishes six key objectives that guide all asset-related activities, ensuring a holistic approach to meeting residents' needs and improving their well-being. This Housing Delivery Plan specifically focuses on the practical implementation and achievement of these objectives, particularly those related to the delivery of new homes.

The six strategic objectives from the AMS include:

- **Objective 1:** Delivering More Homes People Need, Imaginatively and Effectively
- **Objective 2:** Ensuring Every Home is Safe, Healthy, and Fit for the Future
- **Objective 3:** Transforming all Stock into Homes Fit for Modern Lives, Sensitively and Efficiently
- **Objective 4:** Creating Warmer, Greener and More Affordable Homes for a Sustainable Future
- **Objective 5:** Unlocking Potential: Empowering Tenants, Staff, and Innovation for Better Services
- **Objective 6:** Using Insightful Data to Drive Action and Improve Lives

3. Celebrating our achievements: Building on success

Broxtowe Borough Council has demonstrated exceptional performance in housing delivery over the past five years, transforming initial aspirations into tangible results for our communities. Our original plan, established in 2019 and adopted around 2020, set an ambitious target of 230 homes over ten years. We are clearly on the right track to meet this target. This has been driven by a desire to end each year with a greater number of houses in management than we started.

This achievement represents more than mere numbers - it demonstrates our commitment to addressing local housing need and our ability to translate policy into practice. All sites identified in the original plan have either been developed or appropriately replaced with alternative opportunities, showing our adaptive approach to delivery while maintaining focus on outcomes.

Our success stems from developing a comprehensive approach to delivery using multiple complementary mechanisms:

3.1 Council-Led New Build Programme:

We have successfully developed on 4 garage sites (with two in progress) over the past five years, plus an additional 5 on site at Farm Cottage creating 35 new homes through the redevelopment of underused council assets. These

developments, ranging from 2 to 15 units per site, have maximised the potential of previously underutilised land while creating high-quality affordable homes for social rent. The program significantly accelerated in 2023, demonstrating our increasing capacity and expertise.

3.2 Open Market Acquisitions:

This has been our standout success story. Colleagues within Housing and Asset Management have acquired 37 properties over eighteen months, with potential to reach circa. 60 acquisitions over three years (to be agreed). This program has been particularly effective in bringing former council houses back into affordable housing stock, often utilising Right to Buy receipts to fund acquisitions.

3.3 Section 106 Partnerships:

We have successfully secured commitments for 77 affordable housing units (which will be owned and managed by the Council) through Section 106 agreements with developers. Of these, 18 have been completed, 8 are scheduled for delivery in July, and 51 remain in contract for delivery through 2028, with first completions expected in March 2026. This demonstrates our ability to work effectively with private developers to secure affordable housing contributions.

3.4 Securing Strategic Funding Partnerships

One of our most significant achievements has been establishing strong relationships with key funding partners, transforming our financial capacity for housing delivery:

- **Homes England Partnership:** We successfully established a direct relationship with the Homes England growth team. This partnership has delivered substantial grant funding, with examples of £75,000 per unit support, and has been retrospectively applied to acquisitions that weren't initially expected to receive funding. The relationship enables us to access up to 40% grant funding per unit, significantly improving scheme viability.
- **Local Authority Housing Fund (LAHF):** We have successfully secured additional funding from LAHF, including approximately £70,000 per unit for up to three units, thereby diversifying our funding sources and reducing reliance on borrowing.
- **Grant Funding Success:** Our proactive approach to grant applications has achieved remarkable results, with successful retrospective applications for schemes that possibly wasn’t viable two years ago. This demonstrates our growing expertise in funding applications and relationship management.

3.5 Building Organisational Capacity

Beyond individual projects, we have achieved fundamental organisational development that underpins sustainable delivery:

- **Continue to establish a Development team:** Senior colleagues have created a working team, where none existed before. This team have developed

systems, processes, and build relationships with colleagues within Housing to enhance delivery.

- **Apprenticeship Programme:** We have recruited and developed two Degree Apprentices, building internal capacity while creating career pathways within the council. This investment in local talent (alongside our commitment to exploring various sources of employees, including those from underrepresented groups such as people with convictions) ensures continuity and develops expertise specific to our local context.

- **Process Improvement:** We have implemented better record-keeping and system mapping to enable continuity. This systematic approach, means knowledge and processes are preserved regardless of staff changes. Going forward, we would like to consider the adoption of a development cost assessment software (such as Panwin Lite), which provides our standard approach in project viability.

- **Contractor Relationships:** Through working with Housing colleagues, we have identified reliable contractors and developed understanding of local market dynamics. This knowledge enables more effective procurement and reduces delivery risks.

3.6 Learning and improvement

Our achievements include developing a better understanding of what works and what doesn't and learning from errors. We have enhanced consultation and feedback from our customers (tenants) and proactive engagement with elected members. This approach ensures our learning is responsive to diverse needs and feedback, genuinely shaping our direction and enabling effective service delivery. Key areas of improvement include:

- **Market Intelligence:** Housing colleagues and the development team have built effective networks for identifying acquisition opportunities, including relationships with estate agents, off-market contacts, and valuable leads from elected members. This intelligence enables rapid response to opportunities.

- **Process Development:** processes have been refined, such as the handover procedure to ensure defects have been rectified prior to final payment certificate being issued.

- **Financial Management:** We have developed more expertise in budget management and demonstrated improved cost prediction accuracy.

3.7 Creating Positive Momentum

Our achievements have created a culture of optimism and delivery, and the council now has a track record of delivery that enhances credibility. It improves our standing with Homes England, makes developers more willing to work with us on Section 106 schemes, and builds confidence among councillors and senior management for future investment decisions. Our achievements can be measured across multiple dimensions:

- **Delivery Volume**: Exceeded expectations by delivering {tbd} additional units beyond original targets.
- **Delivery Rate:** Accelerated delivery, with the program gaining significant momentum over the last 18 months.
- **Financial Leverage:** Secured substantial grant funding that wasn't previously accessible.
- **Enhanced Financial Control and Strategic Management of Reserves**: We have significantly improved our processes for managing and forecasting key funding streams. This includes implementing robust cross-departmental protocols for Section 106 contributions, ensuring timely allocation and expenditure, and dynamically monitoring Right to Buy receipts to manage fluctuations and strategically reinvest funds, potentially by creating development reserves. This provides greater financial foresight and stability for our delivery programme.
- **Organisational Development:** Established a functioning department with apprentices and systematic processes and a better working relationship with Housing colleagues.
- **Partnership Development:** Built relationships with Homes England, LAHF, contractors, and developers.
- **Asset Optimisation:** Maximised value from underused council assets through garage site redevelopment.

These achievements provide the foundation for our ambitious 2025-2030 plan, demonstrating both our capacity to deliver and our commitment to continuous improvement in service of our communities' housing needs

4. Strategic framework for 2025-2030

Building on our successful track record, we have set an ambitious target of 250 homes over five years (2025-2030), representing an average of 35-50 homes annually. This target reflects our growing capacity and established delivery mechanisms, including the proven success of our open market acquisitions program, which has been an achievement in bringing former council houses back into affordable housing stock. We also acknowledge the variable nature of development opportunities, and our methodology remains fundamentally reactive to opportunities as they arise, within a strategic framework this directly contributes to and is measured against the objectives and key results within the AMS.

Broxtowe's housing needs are assessed through a dynamic, responsive approach led by our Housing department, which updates needs assessments frequently. This rolling assessment ensures our delivery remains aligned with current demand and demographic changes across the borough, which is analysed through north and south geographical divisions. Our primary strategic driver is to achieve a net annual increase in the Council's housing stock, mitigating losses through Right to Buy.

The housing mix will continue to focus on meeting the highest identified needs in our area, with our dynamic and comprehensive borough-wide housing needs analysis driving delivery targets and priorities, including specific household types and required property specifications. This comprehensive analysis will continue to inform our delivery to ensure homes meet precise local needs, including the demand for one-bedroom properties. Historically, our developments have delivered approximately 70% affordable rent and 30% shared ownership. However, it is important to note that all new build and acquisition programmes delivered by the Council so far have been for social rent. We maintain flexibility to adjust this based on current needs and site-specific circumstances.

4.1 Delivery Methodology

Our five-year plan builds on proven delivery methods while adapting to changed market conditions since 2019. The methodology remains fundamentally reactive, responding to opportunities as they arise, but within a strategic framework that prioritises certain approaches.

Our development approach is fundamentally site-driven and means led, meaning we respond to opportunities as they arise while ensuring they meet identified housing needs. This methodology has proven effective in our previous plan and allows us to maximise opportunities while maintaining focus on housing outcomes.

4.2 Delivery Mechanisms:

- **New Build Development:** This remains our primary delivery method, focused on council-owned sites. We have a definitive garage site plan identifying

numerous underused sites across the borough that are surplus to requirements as garages and suitable for housing development. The garage site program offers several advantages: we own the land (eliminating acquisition costs), sites are distributed across the borough meeting local needs, and developments can be designed specifically for affordable rent, maximising grant funding opportunities.

- **Open Market Acquisitions:** This has been our most successful delivery mechanism and will continue as a core strategy. We will continue to work with colleagues within Housing to focus on former council houses and other suitable properties identified through our established networks of estate agents, member contacts, and market intelligence. This to include where there is scope for extensions to accommodate larger families or where redevelopment is possible.

- **Strategic Section 106 Engagement:** We will position ourselves to step in where housing associations cannot deliver, ensuring affordable housing obligations are met while expanding our stock. This will involve proactive collaboration and equipping key staff with advanced negotiation and partnership skills to secure the best outcomes for our communities. Our aim is to maximise Section 106 contributions, targeting a significant increase in affordable housing delivery that precisely meets assessed local need. We will also explore opportunities for greater communication with housing associations to influence their priorities and potentially increase Section 106 delivery within the borough, leveraging our experience to secure commitments for affordable housing units This approach aligns with our broader objective to secure new stock through opportunistic and innovative routes.

- **Homes for specific needs:** we will also plan to take the lead on developing homes for individuals with specific needs for which social housing is required. Examples of this are providing clustered housing for people or families with disabilities / learning disabilities, veterans and people with dementia.

4.3 Partnership Strategy

- **Homes England:** Our established relationship with the Homes England growth team is fundamental to our delivery strategy. This partnership provides access to grant funding up to 40% of scheme costs and enables retrospective applications for suitable projects. We will continue to develop this relationship and explore additional funding opportunities.

- **Local Authority Housing Fund (LAHF):** We will maintain our partnership with LAHF as an additional funding source, particularly for acquisition programs and specific development types.

- **Developer Partnerships:** Based on our experience, we have identified developers we would be delighted to work with again and others we would approach with caution. This knowledge will inform our engagement with Section 106 opportunities and potential joint ventures.

- **Registered Provider Engagement:** While the housing association market has slowed due to Building Safety Act requirements and interest rate impacts, we will work with Housing colleagues to have much more influence with large regional housing associations to get them to prioritise Section 106 within Broxtowe. This will be supported by cultivating strong consultant partnerships and implementing a clear, long-term procurement methodology to enhance efficiency and secure optimal outcomes.

4.4 Financial Strategy and Funding

Our financial strategy prioritises maximising grant income to reduce borrowing requirements and ensure scheme viability. The estimated total cost for our 250-home program ranges from £45 million (using median costs of £180,000 per unit) to £62.5 million (using top-end costs of £250,000 per unit). It is important to note that these costs are subject to change, as evidenced by build costs which rose over 30% during 2016-2021, and construction cost inflation remains a key risk.

4.5 Funding Hierarchy:

- **Grant Funding (Primary):** Homes England and LAHF grants provide up to 40% of scheme costs.
- **Section 106 Contributions:** Incredibly beneficial when available, though timing and amounts vary, requiring robust inter-departmental tracking.
- **Right to Buy Receipts:** Particularly effective for acquisition programs; fluctuations will be monitored and managed.
- **Prudential Borrowing:** Balancing funding for viable schemes, subject to interest rate conditions and overall Council borrowing capacity.

Our approach remains scheme-by-scheme assessment, allowing flexibility to optimise funding packages based on current market conditions and available resources. This methodology has proven successful and allows us to maximise grant income while maintaining financial prudence. While currently operating on a scheme-by-scheme approval basis, the Council will explore opportunities for greater internal strategic budget allocation for the development programme in future, to enhance flexibility and responsiveness, mirroring successful Housing Association models where appropriate and feasible within local authority governance. It will be vital to ensure there is an agreed methodology to test the viability of each scheme assessment to ensure the Council doesn't incur too much debt and risk. Other key policies will be referenced (e.g. Sale of Surplus Land policy / Acquisitions policy) and delegated authority financial limits will be shared so officers understand the operating limits.

Based on our target of 50 homes annually and median costs, we anticipate annual investment of approximately £9 million, rising to £12.5 million in higher-cost scenarios. This level of investment is achievable through our established funding mechanisms and partnerships, and the new homes are expected to generate rental income,

contributing to the long-term sustainability of the Housing Revenue Account (HRA) and bolstering the Council's financial position.

5. Risk Management and Mitigation

5.1 Key Risk Categories

- **Capacity and Staffing Risks:** The most significant risk to delivery is internal capacity. Although the team has expanded over the last 12 months, our current structure relies heavily on temporary staff.
    - **Mitigation:** Immediate recruitment of permanent Head of Development and creation of an experienced Development Officer role to provide sustainable staffing structure. The apprenticeship program continues to build long-term capacity.

- **Financial and Market Risks:** Construction costs and land costs are expected to increase, while interest rate volatility affects borrowing decisions. Right to Buy receipts may rise and then fall based on government policy changes.
    - **Mitigation:** Scheme-by-scheme financial assessment with contingency planning, maximising grant funding to reduce borrowing exposure, and maintaining flexible approach to delivery timing based on market conditions. The Council will monitor Right to Buy receipt levels closely and explore strategies to manage fluctuations, such as potentially creating a development reserve during periods of high receipts to smooth funding availability in subsequent years.

- **Section 106 and Partnership Risks:** The housing association market has slowed, potentially requiring the council to take on more Section 106 schemes as provider of last resort. Information flow regarding Section 106 funds between departments needs improvement to prevent funds being clawed back.
    - **Mitigation:** Implementing a robust cross-departmental S106 tracking and allocation protocol, involving Planning, Finance, and Housing Development, to ensure timely allocation and expenditure. Building relationships with housing associations to influence their priorities, and maintaining capacity to step in as S106 provider when necessary.

- **Delivery and Contractor Risks:** Experience has shown variations in contractor performance, with some delivering excellently while others present challenges. A new procurement process required by Homes England funding presents untested risk.
    - **Mitigation:** Utilising established contractor relationships, maintaining project risk registers for each scheme, and careful management of new procurement processes with appropriate support.

5.2 Risk Monitoring

We are to ensure active risk registers for each scheme are maintained covering contractor performance, cash flow, supply chain issues, and delivery timetables. These are to be reviewed at regular site meetings and inform decision-making throughout project lifecycles.

6. Implementation and Next Steps

6.1 Immediate Priorities (Year 1)

Our immediate priorities for Year 1 (2025-2026) are strategically aligned with foundational initiatives required to deliver against the AMS Key Results:

- **Securing Permanent Leadership and Strengthening Staffing:** The recruitment of a permanent Head of Development and an experienced Development Officer is crucial for building sustainable capacity. This will ensure the long-term capability needed for effective housing delivery.
- **Finalising Garage Site Pipeline:** Detailed plans for identified garage sites will be informed by the comprehensive borough-wide housing needs analysis driving delivery targets and priorities.
- **Optimising Funding Relationships:** Strengthening partnerships with Homes England and LAHF focusing on securing external grant funding for housing delivery. Our proactive approach to grant applications has already yielded significant success.
- **Improve Interdepartmental Processes:** Continue to improve protocols within the Housing Delivery Group. Develop and implement a cross-departmental S106 tracking and allocation protocol, potentially leveraging a shared GIS system and regular, minuted meetings between Planning, Finance, and Housing Development to ensure timely allocation and expenditure of S106 funds.
- **Development of an annual financial report:** this will identify the financials around our housebuilding programme so members and officers can track borrowing levels. This will ensure the HRA is not too heavily debt laden. Officers to consider whether this report is to be contained as a separate section within the annual treasury management report and complement the externally commissioned HRA financial Business Plan.

6.2 Medium-term Objectives (Years 2-3)

Our medium-term objectives will focus on scaling up delivery and refining processes, directly contributing to the ongoing achievement of AMS Key Results and initiatives:

- **Scale Up Delivery:** Achieve consistent annual delivery of 50+ homes.
- **Diversify Opportunities:** Expand acquisition programs and explore additional Section 106 partnerships.
- **Build Market Presence:** Establish Broxtowe as preferred partner for housing associations and developers.
- **Develop Internal Expertise:** Continue apprenticeship programs and skill development.

6.3 Long-term Goals (Years 4-5)

- **Achieve Target Delivery:** Complete 250-home program.

- **Establish Sustainable Model:** Create self-sustaining delivery capacity for future programs.
- **Maximise Community Benefit:** Ensure homes meet local needs and contribute to community development.
- **Build Future Pipeline:** Identify and develop opportunities for next planning period.

7. Conclusion

This Housing Delivery Plan builds on demonstrated success to set ambitious but achievable targets for 2025-2030. Our track record of exceeding previous targets, combined with established partnerships and proven delivery mechanisms, provides confidence in our ability to deliver 250 new affordable homes over the next five years.

Success depends on addressing identified capacity constraints while maintaining the flexibility and responsiveness that has characterised our previous achievements. With appropriate staffing investment and continued partnership development, Broxtowe Borough Council will continue to lead in affordable housing delivery, providing homes that meet local needs while maintaining financial sustainability.

Our approach balances ambition with realism, building on what works while adapting to changing circumstances. The result will be significant contribution to addressing local housing need while establishing Broxtowe as a model for effective council-led housing delivery.

8. Document Attributes

Document Information

Information Type	Document Information
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Heads of Service

Coverage

Name/Group:
All Staff

End of Document

Cabinet **3 July 2025**

Report of the Portfolio Holder for Economic Development and Asset Management and the Portfolio Holder for Housing

Homes England Compliance Audit Report

1. Purpose of Report

For Cabinet to acknowledge the positive outcome of the Homes England compliance audit in accordance with the Council's Corporate Priority of Housing – a good quality home for everyone.

2. Recommendation

Cabinet is asked to NOTE the positive outcome of the Homes England compliance audit report.

3. Detail

The Council was selected for a Homes England (HE) compliance audit. The purpose of the audit was to assess whether the Council, as the grant recipient, have met the HE funding conditions, contractual requirements and responsibilities as set out in the Capital Funding Guide. The Selside Court development site (a former garage site in Chilwell) was selected for the audit.

The outcome of the audit showed a very positive final grade as 'Green'. This means that the Council has complied with the requirements and obligations as set out in the HE grant agreement. The final judgment summary stated that 'On review of the evidence provided, the outcome of the audit has shown the provider has complied with all the programme requirements and guidance. A GREEN grade has been assigned and no breaches were identified'.

The Council's Development Delivery team has established a good working relationship with both HE and the East Midlands Housing Group as part of the wider Quantum Development Consortium. The aim is to continue building this relationship, ensuring the Council has mechanisms to report on its development progress and continue to secure further grant funding to build more affordable homes.

The HE compliance report can be found in the **Appendix.**

4. Key Decision

This report is not a key decision.

5. Updates from Scrutiny

Not applicable.

6. Financial Implications

   The comments from the Assistant Director Finance Services were as follows:

   The positive outcome of the Homes England compliance audit is encouraging and significant. It will help the Council to continue to build upon its strategic partnerships with development activity and allow further access to capital grant funding that will support the Council's investment in its ambitious Housing Delivery programme.

7. Legal Implications

   The comments from the Head of Legal Services were as follows:

   There are no direct legal implications arising from this report.

8. Human Resources Implications

   The comments from the Human Resources Manager were as follows:

   Not applicable.

9. Union Comments

   The Union comments were as follows:

   Not applicable.

10. Climate Change Implications

    The climate change implications are contained within the report.

11. Data Protection Compliance Implications

    This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    Not applicable.

13. Background Papers

    Nil.

Compliance Audit Report – 2024/25

Appendix

37UD – Broxtowe Borough Council

Final Grade	Green - Meets requirements
Independent Auditor Organisation	Beevers Struthers
Independent Auditor Name	Elizabeth Hatchman

Report Purpose and Objectives

The purpose of the Compliance Audit report is to confirm that grant recipients have met Homes England's funding conditions and contractual requirements and have properly exercised their responsibilities as set out in the Capital Funding Guide.

We use the audit findings (which are confidential between Homes England and the grant recipient) to inform our future investment decisions and to reassure the Homes England Chief Accounting Officer that public funds have been properly used.

Where findings have been determined as breaches they are then used as the basis for recommendations and final grades for Providers. Grades of green, amber or red are awarded; definitions are provided at the end of this report. Where applicable the Provider is to use the recommendations to prevent similar breaches from reoccurring in the future and to aid good governance for complying with Homes England's policies, procedures and funding conditions.

Information about the audit process and guidance is available at: https://www.gov.uk/guidance/compliance-audit

Compliance Audit Grade and Judgement Summary

Final Grade	Green - Meets requirements
Judgement Summary	On review of the evidence provided, the outcome of the audit has shown the provider has complied with all the programme requirements and guidance. A GREEN grade has been assigned and no breaches were identified.

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Scheme/Completions details

Scheme ID/ Completion ID	Address/Site ID	Scheme type
1089709	Selside CourtSelside Court,NG9 5NF	Rent

Audit Results

Number of Schemes/Completions Audited	1
Number of Breaches Assigned	0
Number of High Severity Breaches	0
Number of Medium Severity Breaches	0
Number of Low Severity Breaches	0

Provider's Acknowledgement of Report

The contents of this report including all recommendations must be acknowledged by your Board's Chair or equivalent. Confirmation of this acknowledgement must be recorded in the IMS Compliance Audit System by your Compliance Audit Lead no later **than three calendar months** of the report email notification being sent.

Report acknowledged by:
Date:

Confidentiality

The information contained within this report has been compiled purely to assist Homes England in its statutory duty relating to the payment of grant to the Provider. Homes England accepts no liability for the accuracy or completeness of any information contained within this report. This report is confidential between Homes England and the Provider and no third party can place any reliance upon it.

Compliance Audit Grade Definitions

Green Grade	No high or medium severity breaches identified, although there may be low breaches identified. The Homes England audit report shows that the provider

	has a satisfactory overall performance but may identify areas where minor improvements are required.
Amber Grade	One or more medium severity breaches identified. The Homes England audit report will shows that the provider has failed to meet some requirements but has not misapplied public money. The provider will be expected to correct identified problem(s) in future schemes and current developments.
Red Grade	One or more high level severity breaches identified, the Homes England audit report shows that the provider has failed to meet some requirements and there has been a risk of misapplication of public funds.

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Cabinet **Thursday, 20 June 2024**

Report of the Portfolio Holder for Community Safety

Annual Food Safety Service Plan 2025/26

1. Purpose of Report

To advise Members of and seek approval for the Food Safety Service Plan 2025/26. This is in accordance with the Council's corporate vision of "A greener, safer healthier Broxtowe where everyone prospers."

2. Recommendation

Cabinet is asked to RESOLVE that the Annual Food Safety Service Plan 2025/26 be approved.

3. Detail

The Food Standards Agency Framework Agreement sets out what the Food Standards Agency expects from local authorities in their delivery of official controls on food law. It includes the requirement to prepare a statutory Food Service Plan and prescribes in detail which areas of the service should be covered by the Plan.

The Plan describes how the service is discharged and details the numbers, types, and priority ratings of the Borough's food premises, the frequencies of planned interventions, sampling programmes, health promotion activities, reactive work, including responding to food complaints, food hazard warnings and investigating cases of infectious disease. As well as containing data from the last financial year, the Plan contains information on proposals for undertaking duties in 2025/26.

A full copy of the proposed Broxtowe Borough Council Statutory Food Service Plan 2025/26 is attached in the **Appendix**.

4. Key Decision

This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as it covers more than two Wards.

5. Updates from Scrutiny

Not applicable.

6. Financial Implications

   The comments from the Assistant Director Finance Services were as follows:

   There are no additional financial implications to consider with the cost of operational activity being contained within existing budgets. Any significant budget implications in the future, over and above virement limits, would require approval by Cabinet.

7. Legal Implications

   The comments from the Monitoring Officer / Head of Legal Services were as follows:

   Failure to have an agreed plan in place is contrary to the Food Law Code of Practice (England) (amended March 2021) requirements and can be a point of failure if the Council receives an audit by the Food Standards Agency. The plan is subject to amendment and review in accordance with good practice, guidance and legal controls.

8. Human Resources Implications

   Not applicable.

9. Union Comments

   Not applicable.

10. Climate Change Implications

    There are no climate change implications contained within the report.

11. Data Protection Compliance Implications

    This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    An equality impact assessment is not required as there is no change to an existing policy.

13. Background Papers

    Nil.

Appendix

Broxtowe Borough COUNCIL

Food Service Plan 2025/26

May 2025

1.0 Introduction

Broxtowe Borough Council (the Council) is committed to ensuring that food produced, sold or consumed in the district is safe to eat and does not pose a risk to public health.

This Food Service Plan sets out how the Council will deliver the elements of food safety and hygiene for which the Council has enforcement responsibility.

The requirement to have a Food Service Plan is laid down by the Food Standards Agency (FSA) in its Framework Agreement on Local Authority Food Law Enforcement. The FSA was established in April 2000 as an independent monitoring and advisory body and is the central competent authority responsible for food safety in the UK.

The FSA's Recovery Plan introduced between August 2021 and the end of March 2023 to ensure Local Authorities caught up with food inspections following COVID-19 was fully implemented by the Council. A normal food premises inspection programme was adopted by the Council for 2023/24. This resulted in 100% of programmed inspections being completed. A normal food premises inspection programme was undertaken in 2024/25 and once again resulted in 100% of programmed inspections being completed.

The COVID-19 Recovery Plan resulted in the bunching of inspections due to the rapid completion of visits by Officers and Consultants during the recovery period. This continued during 2024/25 when a disproportionate number of E-rated premises became due for inspection. Officers have started to work on the bunching by moving inspections forward during the course of the year. This work will continue in the coming years until there is a more even spread of inspections across each 12-month inspection period.

As in 2023/24, the last 12 months saw a high number of new food premises registrations. These included a large proportion of home-based activities such as cake bakers and a high turnover of some of the takeaway type premises. Many proposed new food businesses are proving challenging to inspect due to delays in opening and in the complexity of the type of food and manner of preparation. Whilst there are a lot of domestic cake bakers still registering, people are more regularly wanting to cook food for takeaway at home and make and process novel foods which have specific food safety challenges, especially in a domestic setting.

2.0 Food Safety Service Aims and Objectives

2.1 Aim

To maintain, and where possible improve, the health and wellbeing of residents and visitors to the Borough of Broxtowe and the success of local food businesses by ensuring the safe production, processing, handling, storage, distribution and sale of food in the district.

2.2 Objectives

- To ensure that at all levels of the food chain, all food prepared, sold or offered for sale is wholesome and fit for human consumption.
- To operate the service in accordance with the relevant Code of Practice, practice guidance and the requirements of the Food Standards Agency.
- To keep accurate records of all food enforcement activities and maintain an accurate register of food businesses in the Borough.
- To carry out food hygiene interventions in accordance with the minimum inspection frequencies and to standards determined by the Food Standards Agency.
- To participate in the National Food Hygiene Rating Scheme providing information about businesses to facilitate customer choice.
- To encourage standards of hygiene higher than the minimum acceptable in law.
- Working towards increasing overall food hygiene ratings for food businesses, thereby protecting food consumers within the Borough
- To aid local businesses export food and drink to the EU and worldwide by providing export health certificates.
- To deal with food alerts in accordance with Food Standards Agency guidance.
- To investigate complaints relating to food premises or food sold in the Borough of Broxtowe.
- To investigate notified cases of food and water borne illness and take effective action to control the spread of infection.
- To sample and risk-assess private water supplies.
- To effectively and efficiently meet the needs of the public and businesses using our service and to respond positively to challenges.
- To respond to planning and licensing consultations as a statutory consultee.
- To participate in Safety Advisory Groups (SAGs) to provide early advice on food safety matters at larger events.
- To increase the knowledge of food handlers and the general public about the principles and practice of food hygiene.
- To support and promote schemes and initiatives which improve the health of customers of food businesses where they are viable.
- To undertake surveillance, inspection and sampling of foods and food contact materials including imported food in accordance with national food sampling surveys taking action to remove unsafe food from sale.
- To provide appropriate responses to public health emergencies.
- To work with partners to maintain a safe community.

3.0 Links to Broxtowe's Corporate Plan

The Council's priorities are detailed in the Corporate Plan 2025-2029

The Food Service Plan accords with the Council's Vision which is: *"A greener, safer healthier Broxtowe where everyone prospers."*

The Food Service Plan contributes directly to the Business Growth and Health priorities in the Corporate Plan which are:

“Invest in our towns and our people” and “Healthy and Supported Communities.”

4.0 Organisation structure and staffing

The food safety service is within the Environmental Health Team. Since June 2021, the Head of Environmental Health reports directly to the Chief Executive. A permanent Senior Environmental Health Officer has managed the food safety service since May 2023. This has helped to reduce the number of direct reports to the Head of Environmental Health. The Environmental Health remit also includes occupational health and safety, environmental protection, private sector housing, dealing with public health emergencies, animal, skin piercing and scrap metal licensing and registrations, private water supplies and camping and caravan sites. The wider Licensing function (taxis, liquor, street collections, massage and special treatments, sexual entertainment venues and gambling etc.) has also been under the Head of Environmental Health’s management since 1 July 2021.

The establishment provides for eight suitably qualified Officers who are able to undertake food safety, occupational health and safety, licensing, registrations, private water supply and infectious disease investigation duties. This comprises of the Head of Environmental Health, Licensing and Private Sector Housing, six Environmental Health Officers (Senior EHO, 2 full-time EHOs, 3 part-time EHOs) and one part-time Environmental Health Technical Officer (who is qualified to the Higher Certificate in Food and Food Premises Inspection standard).

The food safety service has been fully resourced since early July 2023, however, there is a pending vacancy for a full-time EHO. In addition, one of the part-time EHOs is looking to retire in the next 6-12 months. There are also other vacancies in the private sector housing team and further recruitment is ongoing.

Administration support is provided by another department, which also supports other teams. As of April 2025, the resource allocation for food safety duties equates to 3.25 Full Time Equivalent Officers (FTE).

5.0 Employee Development and Competency

All Officers are subject to regular appraisal and participation in competency assessments and authorisation frameworks for the relevant service areas. Specific Continuing Professional Development (CPD) requirements as required by the Food Law Code of Practice, membership of the Chartered Institute of Environmental Health or equivalent professional bodies are also adhered to. It is essential that Officers are up to date with legislation and enforcement issues and the service utilises free and low-cost training courses available in addition to completing specific job training as required and utilising tools such as the FSA’s Competency Framework for food Officers and cascade training through the team as appropriate.

The Environmental Health section is responsible for all aspects of food hygiene and safety, private water supplies and infectious disease control, as well as a wide range of other duties including wider public health duties, occupational health and safety,

animal activity licensing, the registration of skin piercing activities, consultations for planning, licensing applications and temporary event notices.

All Officers within Environmental Health work generically, providing a full range of services within the field. All Officers are expected to prioritise a workload that includes a range of cases both of a proactive and reactive nature and a risk profile suitable for their role.

In terms of food safety services, responsibilities include:

- Inspection of food premises in accordance with the Food Law Code of Practice.
- Registration of food businesses.
- Approval and inspection of businesses producing foods of animal origin.
- Investigation of complaints about food and hygiene at food premises.
- Promotion of documented food safety systems.
- Participation in, and promotion of, the National Food Hygiene Rating Scheme, including requests for re-ratings.
- Sampling of food for microbiological examination.
- Investigation of food borne and water borne infection.
- Investigation of food poisoning outbreaks.
- Imported food control.
- Sampling.
- Food alerts (food hazard warnings).
- Provision of advice and guidance including participation in events that promote food safety and supporting new and proposed food businesses.
- Provision of Health Certificates as requested.

Whilst undertaking food safety interventions, Officers also carry out the following additional functions:

- Hazard spotting in relation to health and safety issues.
- Priority based health and safety inspections.
- Waste disposal arrangement checks.

As part of the provision of a complete service, the section works in conjunction with the following partner organisations:

- The Food Standards Agency (FSA).
- Department for Environment Food and Rural Affairs (DEFRA).
- The Health and Safety Executive (HSE).
- The UK Health and Security Agency (UKHSA).
- The UKHSA Food, Water and Environmental Microbiology laboratory (FWEM) based in York.
- Other local authorities including Public Health, Trading Standards etc. as appropriate.
- Public Analyst.

The Council is also represented on the following working groups:

- Nottinghamshire Food Liaison Group
- Nottinghamshire Food Sampling group
- Nottinghamshire Licensing and Registration Subgroup
- Nottinghamshire Health and Safety Group
- Nottinghamshire Regulatory Managers Group
- Health Protection Strategy Group
- Local Health Protection Board
- Local Health Resilience Forum
- Midland Health and Safety Group
- East Midlands Work Related Deaths Forum
- Nottinghamshire Tobacco Control Forum
- Nottinghamshire Health Partnership
- Ad-hoc outbreak control teams

These groups also contribute to wider regional and national working groups.

5.1 Quality Assurance

The following monitoring arrangements are in place:

- Paper/computer-based checks in respect of food hygiene inspections.
- Shadow inspections for new employees, existing employees, contractors and those returning to food work.
- Regular 1:2:1s with all team members
- Regular team meetings
- Peer review/audit of enforcement action in respect of food safety work.
- Regular consistency exercises set by the Food Standards Agency to check for variations between Local Authorities.

6.0 Enforcement Protocol

The enforcement protocol has been approved by the Council and reflects the intention of the service to meet the requirements of criminal investigation laws and the Regulators Compliance Code.

7.0 Demands on the Food Service

The following paragraphs outline the various demands on the service and the profile of the premises within the Borough.

7.1 Number of Premises

As of 11 April 2025, there were 844 food premises (plus 3 businesses outside scope) on the Broxtowe food database. The table in the **Appendix** shows:

- The numbers of each type of food business,
- The spread of Food Hygiene Ratings.
- unrated food businesses (those that have yet to receive a full inspection and rating); and
- The number of businesses that are included and excluded from the Food Hygiene Rating Scheme.

7.2 Interventions at Food Establishments

The Council uses the Food Hygiene Intervention Rating Scheme as detailed in the Brand Standard for the National Food Hygiene Rating Scheme and the Food Law Code of Practice to determine the frequency that food premises should be inspected. This ensures that all premises are inspected at an appropriate minimum interval determined by their individual risk rating. The risk rating is based on the nature of food handling undertaken, the level of compliance with legal requirements and confidence in food safety management systems. The minimum frequency varies from six monthly to three years depending on the assessed risk category.

As of 11 April 2025, the breakdown of food businesses by category in the Borough is shown in table 1.:

Priority	Premises category	Premises score	Frequency of inspection	Total number of premises in category
A	**High**	92 or higher	6 months	5
B	**High**	72 to 91	12 months	40
C	**High**	52 to 71	18 months	158
D	**Low**	31 to 51	24 months	278
E	**Low**	0 to 30	Alternative Interventions (36 months)	321
Unrated	**Other**		New premises within 28 days of registration	15
Unrated	**Other**		New premises outside 28 days of registration	52
Outside Programme	**Other**			3
Total				847

Table 1: Food businesses by risk category

Additional interventions and Officer time are directed at those businesses, which fail to meet basic food safety compliance. Ratings of businesses meeting the criteria contained in the Brand Standard are published on the Food Standards Agency's website as part of the National Food Hygiene Rating scheme.

A specific database is used to generate and record interventions. This database is also used to extract data to upload to the national Food Hygiene Rating Scheme website, the Food Hygiene Local Authority Return to the FSA (completed twice a year end of September and end of March), the Health and Safety Executive/Local Authority Enforcement Liaison Committee (HELA) return to the Health and Safety Executive (HSE) and other statutory returns (e.g. Drinking Water and Animal activities licensing returns to Department of Food and Rural Affairs (DEFRA), Noise return to the Chartered Institute of Environmental Health (CIEH)).

The premises score includes weightings for complex processes, type of food handled, number of consumers, vulnerable groups, condition of the structure of the premises and confidence in management etc. Category A premises are usually manufacturers or premises with a poor compliance history. Category E premises are usually retailers of packaged ambient food or wet sales pubs etc.

Inspections with a Hygiene Rating of 0, 1 and 2 (on a scale of 0 - Requires Urgent Improvement to 2 – Improvement Necessary) and businesses in categories A and B usually generate a revisit. Additional revisits are generated at the request of the food business operator to review their food hygiene rating, where there are customer complaints, for new business start-ups and where major alterations or refurbishments are planned. Following the Food Standards Agency's guidance for the delivery of the Food Hygiene Rating Scheme, the Council adopted a cost recovery charge in August 2023 for those businesses who request a revisit to re-rate their Food Hygiene rating following receipt of a Rating of less than 5 at a routine inspection.

In 2024/25, the Council continued to see a high number of new food premises registrations. These included a large proportion of home-based activities such as cake bakers and a high turnover of some of the takeaway type premises. This continues to pose a challenge to identify, assess likely risk and inspect in a timely manner.

Additional complications with many of these new registrations include:

- Food Business Operators (FBO) with limited food safety knowledge and experience.
- Businesses that register and are not ready to trade for months.
- Domestic businesses that want to operate more like a takeaway cooking food to be sold hot.
- Domestic businesses wanting to make and process complex and novel foods such as fermented, pickled, dried and smoked products of animal and non-animal origin.

All these complications add to the Officer time required providing advice and guidance before businesses can be inspected and awarded a Food Hygiene Rating. These trends continue and it is predicted that both the high number of new food premises and their complexity will continue into subsequent years due to cost of living pressures and competition in the food sector.

7.3 Food and Water Sampling

Sampling of food, including imported food, water, and materials in contact with food is carried out as part of a county, regional and national sampling programme. Sampling will also be undertaken, where appropriate, in relation to food poisoning outbreaks and food complaints, where formal action is being considered. Food samples for microbiological examination are sent to the Public Health Laboratory at York. Other food samples and private water supplies are sent to the Public Analyst.

7.4 Control and investigation of outbreaks and infectious diseases related to food, water, travel or recreational activities.

The service has a policy to investigate any suspected cases of infectious disease to minimise spread of infection. A matrix exists regarding the cases to be investigated, and liaison takes place with The UK Health and Security Agency (UKHSA). Samples are currently sent to the laboratory at Birmingham for analysis.

7.5 Food Safety Alerts, Product Recall Information and Allergy Alerts.

The policy of this service is to respond appropriately to food alerts and intelligence, to investigate food safety incidents and generate food alerts as necessary in accordance with the requirements of the Food Safety Code of Practice and associated Practice Guidance.

7.6 Health and Food Safety Education and Promotion

The service participates, where resources permit, in targeted local and national activities and interventions.

8.0 Service Data for 2024/25

8.1 Food Hygiene Interventions in 2024/25

Interventions undertaken (by category of premises). Please note these relate to proactive inspections. Other interventions to food businesses were also undertaken. Work to identify risk and prioritise newly registered food businesses will continue to be undertaken in 2025/26 to ensure new higher risk businesses are inspected earlier.

A	B	C	D	E	Unrated	TOTAL
7	52	58	88	172	102	479

Table 2: Food Hygiene Interventions

As of 31 March 2025, there were zero overdue programmed inspections for Cat A-E food premises and 67 new businesses that were yet to be inspected and risk rated,

52 of which were over 28 days – further details of these can be found in sections 9.4 and 11.

The Food Service received a total of 142 new food business registrations during 2024/25. This is higher than the 124 new food business registrations received during 2023/24.

8.2 Number of revisits in 2024/25

There were 27 revisits undertaken, of which 13 of these were paid for re-rating revisits. Additional revisits were also undertaken to monitor particular issues identified during interventions.

8.3 Requests for Service 2024/25

Requests for service include concerns regarding the condition of the premises, or food with microbiological or physical contamination.

Hygiene of premises	Food complaints	Food safety Advice	Export certificates
56	57	81	0

Table 3: Requests for Service

8.4 Enforcement Action (Premises) 2024/25

Informal Warnings (including emails and letters)	Over 300
Improvement Notices	0
Hygiene Emergency Prohibition Notices	0
Hygiene Emergency Prohibition Orders	0
Voluntary Closure	0
Seizure, Detention, Voluntary surrender of food	1
Simple Cautions	0
Prosecutions	0

Table 4: Enforcement Actions

Officers used a graduated approach, where possible, to ensure compliance with food safety requirements, which resulted in very little formal enforcement action being required. All actions are risk-based and explained to businesses. All food businesses that receive a low Food Hygiene Rating are monitored and revisited to ensure improvements are made and that standards do not slip further.

Hygiene Emergency Prohibition Notices are served where an imminent risk of injury to health has been identified, and action is required to stop a food business or process from operating. Any notices served must be followed by an application to the Magistrates' Court within three working days for an Order confirming such action.

8.5 Food and Water Sampling

A total of 29 food and environmental samples were taken in 2024/25. In addition, the authority participated in the national tattooist study which resulted in environmental, water and soap samples being taken from 4 studios (a total of around 40 samples). The UKHSA requested water sampling from 2 domestic settings and a commercial glamping setting with spa pools following separate cases of legionella in the Borough totalling around 18 water samples).

The sampling programme included products identified through national and regional studies. Adverse sample results were identified and followed up with revisits and re-sampling as appropriate.

8.6 Control and Investigation of outbreaks and infectious diseases related to food, water, travel or recreational activities in 2024/25

36 reports of suspected or confirmed cases of infectious disease were notified to the service in 2024/25, which required investigation. This is a 16% decrease compared to 2023/24 (43 reports).

Cases investigated comprised of salmonella, cryptosporidium, e. coli, giardia, hepatitis, shigella and suspected illness following consumption of food and water.

8.7 Food Safety Education and Promotion in 2024/25

The Council participated in proactive and targeted promotion of good hygiene practice and particular initiatives. We continued to provide advice to new businesses.

Nottinghamshire County Council's HOT (Healthy Options Takeaway) Award has been put on indefinite hold due to a lack of resources at a County level and a limited uptake with food businesses due to cost-of-living pressures. The Council will participate with the County as and when the scheme is re-launched or replaced.

9.0 Performance Monitoring

The Food Service aspect of Environmental Health has a number of performance indicators which are monitored as part of the Community Safety Business Plan.

These are:

- Food Inspections – High Risk - Inspect all businesses due for inspection in accordance with a pre-planned programme based on risk. Target 100%.
- Food Inspections – Low Risk - Inspect all businesses due for inspection in accordance with a pre-planned programme based on risk. Target 100%.
- Food - Respond to specific complaints about practices procedures and conditions which may prejudice health in the short term within one working

day of receipt, and non-urgent complaints / general requests for advice within five working days of receipt. Target 100%.

- Infectious Disease - Respond to notifications within one working day and requests for advice and information as soon as practicable within five working days of receipt. Target 100%.

Performance information in respect of these indicators for previous years also given below.

9.1 Performance Trends

2020/21, 2021/22, 2022/23, 2023/24 and 2024/25

Year	Percentage of programmed high-risk inspections completed	Percentage of programmed low risk inspections completed
2020/21	5%	0.5%
2021/22	95%	84.5%
2022/23	100%	100%
2023/24	100%	100%
2024/25	100%	100%

Table 5: Inspections Achieved

9.2 Response to Service Requests within Target Times

Service Type	2020/21	2021/22	2022/23	2023/24	2024/25
Food Safety	97%	93%	97%	99%	98%
Infectious Disease Notifications	100%	100%	100%	93%	94%
Consultations	93%	96%	98%	97%	98.5%

Table 6: Service Request Response Times Trends

A continued increase in consultations were received as business activities varied and diversified. All service requests were assessed and prioritised to ensure urgent enquiries were dealt with more quickly.

At the (priority) request of the Government, the team also participated in the national Funeral Director Inspection programme. This was in response to concerns raised about the handling of deceased remains in Yorkshire during a Police investigation in the largely unregulated area of the Funeral Director Sector. Inspections were undertaken of all of the funeral director premises operating within the Borough in a project co-ordinated across Nottinghamshire.

9.3 Broadly Compliant Premises

88% of premises were at least broadly compliant with a Food Hygiene Rating of 3 – Generally Satisfactory or higher. The figure is down on 2023/24, (89%) and 2022/23, (94%) due to lower Food Hygiene Ratings at a number of premises following inspection but mainly due to an increase in unrated businesses (new business registrations that haven't yet received a full food hygiene inspection for a variety of reasons).

9.4 Proposed Inspection Programme 2025/26

Priority	Premises category	Programmed inspections due 2025/26	Other inspections due 2025/26
A	High	10	-
B	High	39	-
C	High	104	-
D	Low	177	-
E	Low	198	-
Unrated	Other	-	At least 120
Overdue Inspections		0	67 due and overdue unrated
Total		528	187

Table 7: Inspections Programmed 2025-2026

There continues to be a significant number of new business premise registrations being submitted to the Council. All new businesses registering, get signposted to advice to help them commence trading safely. New food registrations are triaged to prioritise visits to higher risk operations. The large number of new registrations, along with other factors (see 7.2) means that, whilst there is an intervention within 28 days of registration, a large proportion cannot be inspected within this time frame. Some registrations are received many months before a business starts operating and therefore cannot be inspected within 28 days of registering.

10.0 Issues for 2025/26

- To continue with the timely intervention of food safety interventions.
- As a result of the number of interventions carried out during the Food Safety Recovery Plan, there will continue to be a large number of inspections due in certain months in 2025/26. The Food Service will manage this and look to move some inspection dates during the year to start to spread inspections out more evenly in years to come. This will be aided over time by the natural turnover of businesses and changes in risk ratings following inspection.
- To ensure active participation in the FSA's ongoing proposed new delivery models, to modernise food safety enforcement and ensure it is sustainable for the future. There are no dates published for when these changes are likely to be implemented.

- Participation in the FSA's other proposed changes to food safety delivery – streamlined professional competency framework and recruitment and retention of qualified food safety officers.
- To continue to participate in national consistency exercises relating to the work of the team.
- To continue to monitor the resource provided to food safety enforcement to ensure it is adequate to meet the demands of the service, including new food business interventions, in a timely manner.
- To continue to provide effective food and registration interventions prioritising high-risk and non-compliant premises.
- To continue to carry out follow up interventions to 0,1 and 2 rated premises to secure improvements.
- To continue to provide a competent team to deal with these areas of service delivery.
- To improve wider team resilience by looking to recruit an apprentice EHO to start in September/October 2025.
- To continue to use the full range of enforcement tools available to protect the safety, health and welfare of visitors, residents and workers within the Borough including targeted health and safety interventions.
- To continue to participate in the National Food Hygiene Rating Scheme.
- To continue to implement changes to regulation of animal licensing activities and ensure that employees meet the qualification requirements to inspect these activities.
- To continue to participate in the development of new enforcement requirements for cosmetic treatments and additional animal activities licensing (e.g. primates).
- To continue to support businesses importing and exporting food products.
- To continue to deal with matters of evident concern at food premises (health and safety, waste management etc.) and signpost businesses to other guidance, teams and agencies as appropriate,
- To continue to work with partner agencies to share intelligence, have a consistent approach to enforcement and identify joint training and working opportunities.
- To continue to participate in Safety Advisory Groups.
- To continue with the implementation of mobile working devices and mobile inspection apps to improve efficiency and effectiveness of the intervention programme.

11.0 Identification of variation from the Service Plan

There are a number of newly registered premises that have not received an inspection within 28 days of registering, as detailed in sections 7.2 and 9.4. All of these businesses have been triaged and have received relevant information to assist in their start up.

Resource must continue to be allocated to monitoring premises with a Food Hygiene Rating of 0, 1 or 2 to ensure improvements in standards is achieved.

Resource must continue to be allocated to dealing with outbreaks of food and water borne illness.

New legislative requirements for the regulation of beauty treatments, licensing of primates (and possible changes to the zoo licensing requirements) will require training and assessing these premises will be resource intensive.

Continued priority of reactive work including notifiable accident, workplace ill health and occupational safety interventions is also necessary.

Appendix. Table 7.1 Breakdown of Food Premises

FHRS rating	Restaurant/ Cafe/ Canteen	Hotel/ Guest House	Small Retailer	Supermarket/ Hypermarket	Caring Premises	Restaurants and Caterers – Other	Distributors/ Transporters	Pub/ Club	Retailer - Other	Take-Away	School/ College	Mobile Food Unit	Manufacturers and Packers	Importers/ Exporters	Primary Producers	Total
5 - Very good	110	4	64	18	59	76	4	57	37	41	42	22	3		1	538
4 – Good	28		16		8	7		17	5	12	3					96
3 - Generally satisfactory	14		5	1	3	4		3	2	18	1					51
2 - Improvement required	2		3			1				2						8
1 - Major improvement required	2		2			1		1	2	2						10
0 - Urgent improvement required																0
Total rated establishments	156	4	90	19	70	89	4	78	46	75	46	22	3		1	703
Establishments with rating of 3 or better	152	4	85	19	70	87	4	77	44	71	46	22	3		1	685
Awaiting inspection	20		2	1	3	20		2	7	14	4				1	74
Exempt			5			2			12							19
Sensitive	5				4						2					11
Excluded	2				17		2		2				13	1		37
Total establishments	183	4	97	20	94	111	6	80	67	89	52	22	16	1	2	844

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Cabinet **29 July 2025**

Report of the Portfolio Holder for Environment and Climate Change

Contaminated Land Strategy 2025-2030

1. Purpose of Report

To seek approval for the updated Contaminated Land Strategy in accordance with the Corporate Priority of Environment – protect the environment for the future.

2. Recommendation

Policy Overview Working Group is asked to RECOMMEND to Cabinet that the updated Contaminated Land Strategy be approved.

3. Detail

The Contaminated Land Strategy details the Council's approach to assessing the risk from contaminated land within the Borough and the need for that land to be remediated, as it is developed to ensure land is suitable for its use. The approach remains unchanged from the previous strategy but includes actions to review the contaminated land prioritisation software, review the site information and carry out further assessments of the highest priority sites. **Appendix 1** contains the strategy, **Appendix 2** is the Change table.

4. Key Decision

This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as it affects all Wards in the Council's area.

5. Updates from Scrutiny

The Policy Overview Working Group will make a recommendation regarding this report.

6. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

There are no additional budget implications to consider at this stage with ongoing business as usual activities being met within existing resources. Dealing with contaminated land issues through development places the remediation costs on the developer. Any intrusive assessments required to assist in the screening, risk profiling and/or emergency remediation works (if not recovered) may incur significant costs, the funding for which would need to be sought on a case-by-case basis. Any significant budget implications in the future, over and above virement limits, would require approval by Cabinet.

7. Legal Implications

   The comments from the Monitoring Officer / Head of Legal Services were as follows:

   It is a requirement of the Statutory Guidance for local authorities to identify and prioritise land most likely to pose the greatest risk to human health and the environment. The priority list of potentially contaminated land sites discharges the above statutory duty by providing the best advice to landowners and developers interested in investing in the town or elsewhere in the Borough. Having such up-to-date information regarding land contamination, the Council can effectively manage risk from any development encountering issues via the planning process coupled with due diligence so that there are no legal repercussions for the Council.

8. Human Resources Implications

   There were no comments from the Human Resources Manager.

9. Union Comments

   There are no Union comments.

10. Climate Change Implications

    The climate change implications are

11. Data Protection Compliance Implications

    This report does not contain any Official (SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    As this is only an update to a policy an equality impact assessment is not required.

13. Background Papers

    Nil.

Contaminated Land Strategy for Broxtowe Borough Council 2025-2030

In fulfillment of Part 2A of the

Environmental Protection Act 1990 (As Amended)

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Report Reference No.	BBC/P2A Strategy/2025
Date	March 2025

Executive Summary

This document is a revision of the Council's Contaminated Land Inspection Strategy last reviewed in January 2018. This revision follows a routine five yearly review. The overall basis of the Strategy remains unchanged from the previous Strategy in that the Planning Regime will primarily be used to deal with land contamination issues in the Borough. This approach followed the decision by central government in 2013 to withdraw funding under the Contaminated Land Capital Grants Scheme used to support Local Authorities in undertaking site investigations and remediation under Part 2A of the Environmental Protection Act 1990 (the Part 2A regime). The changes in funding, investigation and potentially remediation costs under the Part 2A regime now fall entirely to the Local Authority except perhaps for emergency cases and even then, any financial help from Department for Environment, Food & Rural Affairs (Defra) may not be available. These reductions in funding have also occurred at a time of significant cuts to Local Authority Budgets.

The UK has a legacy of land contamination arising from past industrial development. Various industrial practices have led to substances being in, on or under land such as tars, heavy metals, organic compounds, and mining materials. In addition, landfilling of waste sometimes took place without adequate precautions against the escape of landfill gases and leaching of materials.

This Strategy document details how Broxtowe Borough Council, under regulations inserted into the Environmental Protection Act 1990, will inspect the land in its Borough for contamination. It details how the Council will take a rational, ordered, and efficient approach to this inspection.

Defra have indicated that they now expect the vast majority of land contamination to be remediated through the planning process, where (after remediation) as a minimum, land should not be capable of being determined as Contaminated Land under Part 2A of the Environmental Protection Act 1990 and should be suitable for its intended end use.

The investigation of potentially contaminated land under Part 2A of the Environmental Protection Act 1990 is extremely limited. It is likely that for future contaminated land investigations and remediation, the responsibility to fund the majority of such work will fall on the landowner and their insurance companies.

The Council has used all available information and a risk-based approach during the initial screening process and will continue to do so in the detailed inspection of sites to identify Contaminated Land. A rolling inspection programme will be undertaken, running for the duration of this strategy, with the Council producing a public register of any land designated as contaminated.

The process of investigating and remediating land will ensure that all land in the Borough is suitable for use and does not pose unacceptable risks to people, the environment, water, and property.

This revision to the Strategy has been written to reflect this change in emphasis and update on progress made to date.

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Appendices

Appendix I - Characteristics of the Borough

Technical Appendices

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1.0 Introduction

1.1 The Problem of Land Contamination

1.1.1 The National Context

The UK has a legacy of land contamination arising from past industrial development. Various industrial practices have led to substances being in, on or under land such as tars, heavy metals, organic compounds and mining materials. In addition, minerals extraction led to backfilling of land with materials of unknown composition and landfilling of waste sometimes took place without adequate precautions against the escape of landfill gases and leaching of materials. Industrial change and demographic shift during the 20th century resulted in the need for large-scale re-organisation of our towns and cities. Industries moved out or disappeared altogether leaving large swathes of underused land, gaps in our urban landscape. Inevitably, these changes have left behind a legacy of land contamination, which in some cases may be harmful.

In response to this, the UK Government, through the establishment of various policies and the introduction of legislation, has provided a framework, which will endeavour to: -

Prevent future contamination from occurring.

Ensure that appropriate action is taken to deal with existing land contamination where it poses unacceptable risks to human health or to the environment.

Part IIA (commonly referred to as Part 2A) of the Environmental Protection Act (EPA) 1990, introduced by s.57 of the Environment Act 1995, came into force in England on 1 April 2000. It was amended in 2005, 2008 and 2021.

The Government regards the implementation of the Part 2A regime as an essential tool in providing an effective framework to deal with the regulation of contaminated land. It is based upon a set of principles which include *'suitable for use'* standards of remediation, the *'polluter pays'* principle for allocating liability, a '*risk based'* approach to the assessment of contamination and ensuring '*sustainable development'*. **Technical Appendix A** outlines the general principles and definitions of the Part 2A process of identifying and managing contaminated land.

National Objectives

The regime provides a means of dealing with unacceptable risks posed by land contamination to human health and the environment, and enforcing authorities should seek to find and deal with such land based on the principles set out in the Act and the supporting Statutory Guidance. Under Part 2A the starting point should be that land is not contaminated land unless there is reason to consider otherwise. Only land where unacceptable risks are clearly identified, after a risk assessment has been undertaken in accordance with Statutory Guidance, should be considered as meeting the Part 2A definition of contaminated land.

The overarching objectives of the Government's policy on contaminated land and the Part 2A regime are:

1. to identify and remove unacceptable risks to human health and the environment;

2. to seek to ensure that contaminated land is made suitable for its current use; and

3. to ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development.

Enforcing authorities should seek to use Part 2A only where land is clearly identified as 'contaminated' under the definition of Part 2A and where no appropriate alternative solution exists. The Part 2A regime is one of several ways in which land contamination can be addressed.

'Contaminated' land under Part 2A is defined as being land "*in such a condition, by reason of substances in, on or under the land, that (a) significant harm is being caused or there is a significant possibility of such harm being caused; or*

(b) significant pollution of controlled waters is being caused or there is a significant possibility of such pollution being caused".

This definition sets a relatively high threshold of evidence to demonstrate that land is contaminated. In March 2007 (the last date at which national data was published) 781 sites across the UK had been declared as contaminated.

No sites in Broxtowe have been declared as contaminated.

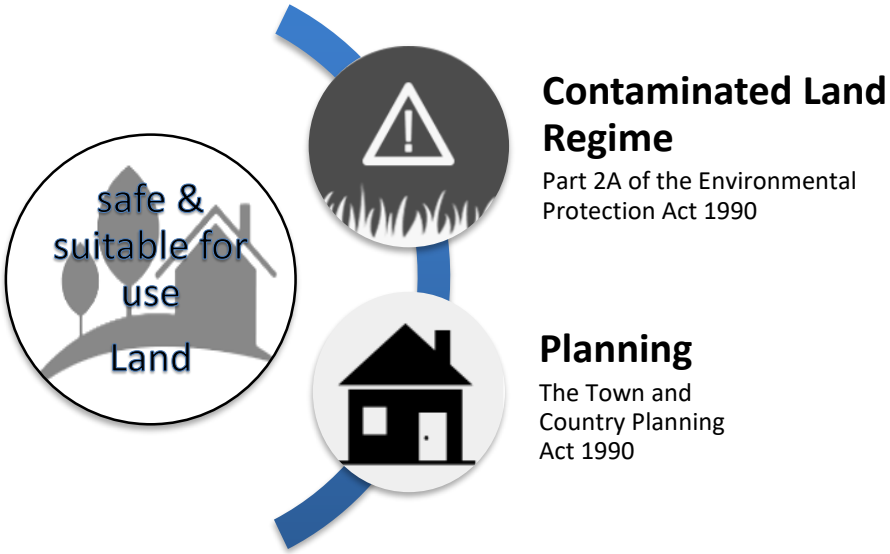
In respect of Japanese Knotweed, DEFRA have previously indicated that Japanese Knotweed (and other problem plants such as giant hogweed) were not intended to be dealt with under the Part 2a regime and that other legislation should be used where required. Part 2a is only used for *land that because of substances, which are in, on or under the land, may cause significant harm or the significant possibility of significant harm to human health or the environment.* ***Substance:*** defined in section 78A(9) as:

"any natural or artificial substance, whether in solid or liquid form or in the form of a gas or vapour.". *HMRC states at CIRD60135 that it interprets "A substance is matter having uniform properties. So, for example, asbestos is a substance but life forms are not."*

Japanese Knotweed (JKW) causes no direct threat of harm to human health and causes no significant pollution to controlled waters.

In 2022 the Royal Chartered Institute of Surveyors updated its guidance and refers to a research paper by Fennell et al (Japanese knotweed (Fallopia japonica): An analysis of capacity to cause structural damage (compared to other plants) and typical rhizome extension), published in 2018, and which reported that Japanese knotweed poses less of a risk of damage to substantial buildings than many trees or woody shrubs.

Land contamination is predominantly addressed using two routes:



In certain circumstances other legislative regimes may also provide a means of dealing with land contamination issues, such as building regulations (Part C); the regimes for waste, water, and environmental permitting (PPC); and the Environmental Damage (Prevention and Remediation) Regulations 2009. Land contamination can also be dealt with under common law.

1.1.2 Dealing with Costs, Benefits and Uncertainties

Under Part 2A, the enforcing authority may need to decide whether and how to act in situations where such decisions are not straightforward and where there is unavoidable uncertainty relating to the facts of each case.

In so doing, the authority should use its judgement to strike a reasonable balance between:

a) dealing with risks raised by contaminants in land and the benefits of remediating land to remove or reduce those risks, and
b) the potential impacts of regulatory intervention including financial costs to whoever will pay for remediation (including the taxpayer where relevant), health and environmental impacts of taking action, property blight, and burdens on affected people.

The aim should be to consider the various benefits and costs of taking action, with a view to ensuring that the regime produces net benefits, taking account of local circumstances.

1.1.3 The Local Context

The Council's Vision for Broxtowe is 'greener, safer, healthier Broxtowe where everyone prospers'.

Broxtowe Borough Council Corporate Plan 2024 – 2029

The contaminated land strategy directly supports the Council's Corporate Priority of Environment – protect the environment for the future as well as complementing other strategies and policies such as health and planning.

Under Part 2A each local authority has to *'cause its areas to be inspected from time to time for the purpose of identifying contaminated land* '(Section 78B). When contaminated land is identified, the local authority must ensure that it is managed in an appropriate manner. Statutory Guidance has been issued to local authorities to take a 'strategic approach' to inspecting their areas.

The aim of this strategic approach to inspection is to ensure that all those affected by and involved in inspections of potentially contaminated land have a clear understanding of the rationale behind the inspection, how it will be carried out and over what timescale.

Historically, Broxtowe, like all other areas of the UK, has been associated with various types of industrial activity that had the potential to have caused land contamination. This is why the Council has a need to focus on the identification and remediation of contaminated land within the Borough.

1.1.4 Enforcement Principles

Much of the Borough's land contamination has been present for long periods of time. It is therefore important to recognise the principle that not all contamination poses problems and much of the contamination which is already present may only be of

concern when or if the land is used for a different particular and more sensitive purpose. Therefore, it may only be necessary to deal with contamination when land is used for a new purpose, such as developing a former industrial site for housing.

However, in some circumstances regulatory action may be needed to make sure that necessary remediation on a site is carried out. The 'suitable for use' approach will ensure that remediation requirements are reasonable and tailored to the needs of individual sites.

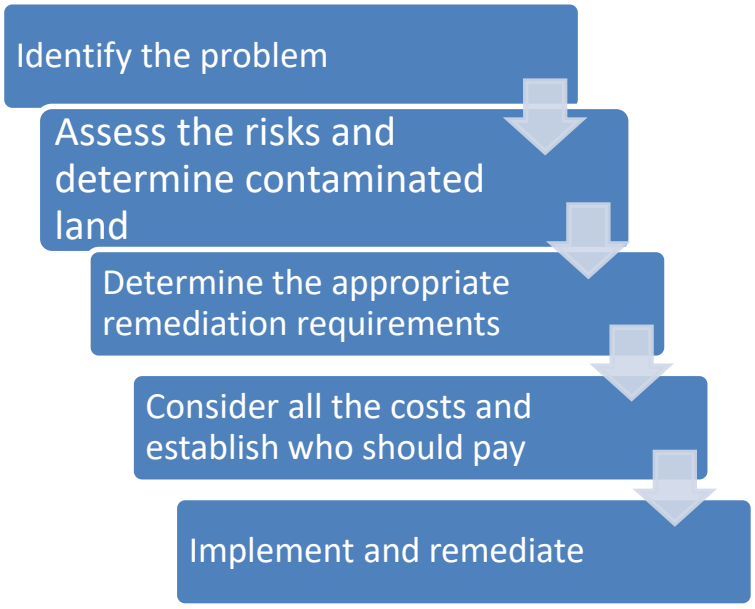
Broxtowe Borough Council has a statutory duty to implement and enforce a diverse range of legislation. The way in which the Council carries out these enforcement duties should be in accordance with the five principles set out by the Legislative and Regulatory Reform Act 2006. The Council has published a corporate Enforcement Policy which sets out in broad terms how the Council will deliver its regulatory functions in accordance with these principles. The principles and practice set out in the Enforcement Policy applies to the way in which this Strategy is delivered.

Depending on particular circumstances, the Council may use a variety of means to ensure that employers, employees, self-employed, landlords and individuals meet their responsibilities. The general principle of the Enforcement Policy is that this will be achieved through escalating interventions from education to advice, guidance, warning letters, statutory notices or prosecutions.

1.2 Regulatory Context

1.2.1 Regulatory role of the Council under Part 2A

The regime is based on the following basic principles: -



Technical Appendix A, D and E expand on these basic principles.

The legal requirement to produce an inspection strategy for contaminated land allows the Council to consider: -

- how best to prepare and implement the strategy through the joint working of individual departments, and.
- the practical working arrangements with external agencies that will have to be in place to effectively implement the new regime.

Statutory Guidance published in 2012 specifies the Council's duty with regard to inspection of its area and also lays down fundamental principles to be followed throughout the inspection process.

In carrying out its inspection duty under Section 78B (1), the Council has taken a strategic approach to the identification of land, which merits detailed individual inspection.

This approach has been:

rational, ordered and efficient

proportionate to the seriousness of any actual or potential risk

seek to ensure that the most pressing and serious problems are located first

ensure that resources are concentrated on investigation in areas where the Council is most likely to identify contaminated land and;

ensure that the Council efficiently identifies requirements for the detailed inspection of particular areas of land.

The Part 2A regime requires that the Council and the Environment Agency work together and share the regulatory duties under this regime. Although the Council have the sole responsibility for the identification of land that meets the statutory definition, the Environment Agency has a duty to provide information and advice, in addition to carrying out inspection at potential 'special sites' on behalf of the Council.

1.2.2 Regulatory role of the Environment Agency

The principal roles of the Environment Agency with respect to contaminated land can be summarised as follows: -

- The regulation of 'special sites' under Part 2A, including the production and maintenance of a public register of special sites remediation.
- The inspection of land that if found to be contaminated, would be a special site under the Contaminated Land Regulations (England) 2006 [as amended] (at the request of and on behalf of the Council).
- The provision of information to the Council on land contamination.
- The provision of advice to the Council on identifying and dealing with the pollution of controlled waters. Where the Environment Agency considers it appropriate, it shall provide site-specific advice on the remediation of sites, which have not been identified as special sites.
- Preparation of a national report on the state of the environment and contaminated land in England.

2.0 Overall Aims and Objectives of the Strategy

Land contamination has the potential to cause significant impacts on both the environment and the economy of the Borough. It is important therefore, that the processes involved in this Strategy document are open and transparent.

2.1 Aims of the Strategy

The Council's priorities when dealing with land contaminated will be: -

Protect	Prevent	Encourage
• Human Health • Controlled Waters • Designated Ecosystems	• Damage to Property • Damage to designated Historic Sites. • Further land contamination	• Voluntary Remedation • the re-use of land considered to be 'affected by contamination 'or '*contaminated*'.

2.2 Contaminated Land Strategy Objectives

1. To follow the overarching objectives of the *Contaminated Land Statutory Guidance (April 2012)* Section 1.
2. To follow the approach, with regard to inspection, contained within Section 2 of the *Contaminated Land Statutory Guidance (April 2012)*.
3. To ensure that where redevelopment of land takes place within the Borough that the planning process deals effectively with any land contamination such that the land is suitable for its intended use in accordance with the NPPF.

4. To ensure that the Strategy is compatible with the Borough Council's Sustainability Objectives, Development Objectives and Corporate Plans.
5. To make information freely available to all relevant services of the Council to enable consideration to be given about land contamination during the policy making process.
6. To protect the Council's own assets from being damaged or devalued due to contamination.
7. To avoid any unnecessary blight of land within the Borough.
8. To provide information to the Environment Agency for its report on Contaminated Land.

3.0 Council's Priority Actions and Timescales

This section sets out the specific approach the Council will be taking to meet the Aims and Objectives outlined in Section 2. It sets out priorities for actions and activities to meet the regulatory requirements.

3.1 Priority Actions

The 5-stage process outlined below follows the principals found in Section 2 of the Statutory Guidance:

Preliminary Stages

Stage 1 - Production of the Strategy Document

A first Contaminated Land Strategy for Broxtowe was produced and adopted in 2001. It has been revised in various iterations, most recently in 2018, to take into account changes in national priorities and revisions in Part 2A and the Statutory Guidance.

Stage 2 – Dealing with urgent sites

Throughout the process of Strategy production, strategic inspection and detailed inspection, if any sites were strongly suspected of causing significant harm, or if any site is referred by the Environment Agency for determination as a "Special Site", then these needed to take priority. This remains the case. All sites will be investigated using procedures laid out in this document.

Strategic Inspection

Stage 3 – Acquisition and input of data into Geographical Information System (GIS)

In order to identify and prioritise sites the Council purchased and acquired data for this purpose. A list of the datasets collated is given in **Technical Appendix B**, the majority of this data was in a digital form, easily entered into the Councils Geographical Information System (GIS); however, some information obtained was in a paper format which required digitising.

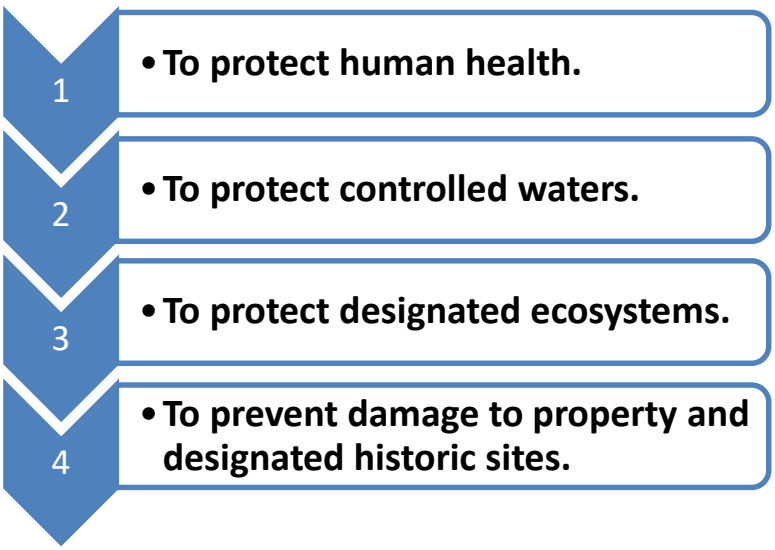
Stage 4 – Prioritisation of sites for detailed inspection

A structured and coherent process for identifying sites which could present the most pressing and serious problems has been implemented.

The list in **Technical Appendix B** outlines potentially contaminative industries given by the then Department of the Environment "Industrial Profiles".

Technical Appendix C describes the risk assessment process which has been followed in order to identify the sites likely to present the most pressing and serious problems.

The Council's receptor priorities are, in order: -



The Council used a computerised screening package which used a numeric 'risk assessment' based approach to prioritise sites **Technical Appendix C**. Some limited walkover survey work was also necessary in order to fill in gaps in the data in relation to pathways and receptors.

Detailed Inspection

Stage 5 - Detailed Inspection of Sites (Technical Appendix D)

Once the ranking process had been completed, some detailed inspection of sites has been undertaken subject to constraints associated with financial resources.

For land to proceed to the next stage of risk assessment there needed to be evidence that an unacceptable risk could reasonably exist. If the authority considered there is little reason to consider that the land might pose an unacceptable risk, inspection activities should stop at that point.

Determination and Apportionment of Liabilities (**Technical Appendix E**)

Where any contaminated land sites are identified, they are determined in accordance with statutory requirements. The sites which are known or suspected to contain contamination, but which do not constitute contaminated land under Part 2A, will only be inspected further if the status of the land changes, for example, if new information about potential contaminants on a site becomes available.

Work outside the Inspection Programme

Triggers for undertaking non-routine inspections

The Strategy recognises that there may be occasions where inspections have to be undertaken outside of the general strategic framework. Triggers for undertaking non-routine inspection include: -

- unplanned events – for example, where an incident, such as a spill, has occurred.
- introduction of new receptors – for example, where a new protected ecosystem is designated, or there is persistent trespass on a site which otherwise does not have a sensitive receptor.
- identification of localised health effects – which appear to relate to a particular area of land.
- responding to information – from other statutory bodies, stakeholders, or other interested parties, which reveal that the site requires urgent action.

Assessment and Remediation though the Planning System

DEFRA have advised that they now expect the vast majority of land contaminated to be remediated through the planning process, where (after remediation) as a minimum, land should not be capable of being determined as Contaminated Land under Part 2A. (See *funding* below)

The National Planning Policy Framework (December 2024) states that:

196. Planning policies and decisions should ensure that:

a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation).

b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and

c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

197. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

The NPPF is likely to be subject to further iterations over the lifetime of this Strategy. It is unlikely that the principles set out in NPPF para 196 and 197 will fundamentally change during this time. However, if there are significant policy changes in the NPPF then this Strategy may need to be amended to take account of these national policy changes.

4.0 Work carried out to date

4.1.1 Planning and Development Control Route

Throughout the period of the delivery of this and previous Contaminated Land Strategies, the Council's Environmental Health Service has been working with Broxtowe's Development Control Service to ensure land contamination issues are addressed during the planning process.

The Environmental Health Service is not a statutory consultee under the development control process. However, through a process of custom and practice, Environmental Health professionals have been invited to make comment on a variety of potential environmental impacts associated with planning applications, including the potential impact of individual development applications on Part 2A.

The Environment Agency (EA) are a statutory consultee, and the EA are invited to submit comments on relevant planning applications.

Figure 1 below illustrates the volumes of planning applications per year which have been assessed and commented on by the Environmental Health service since the start of the Part IIA statutory duty.

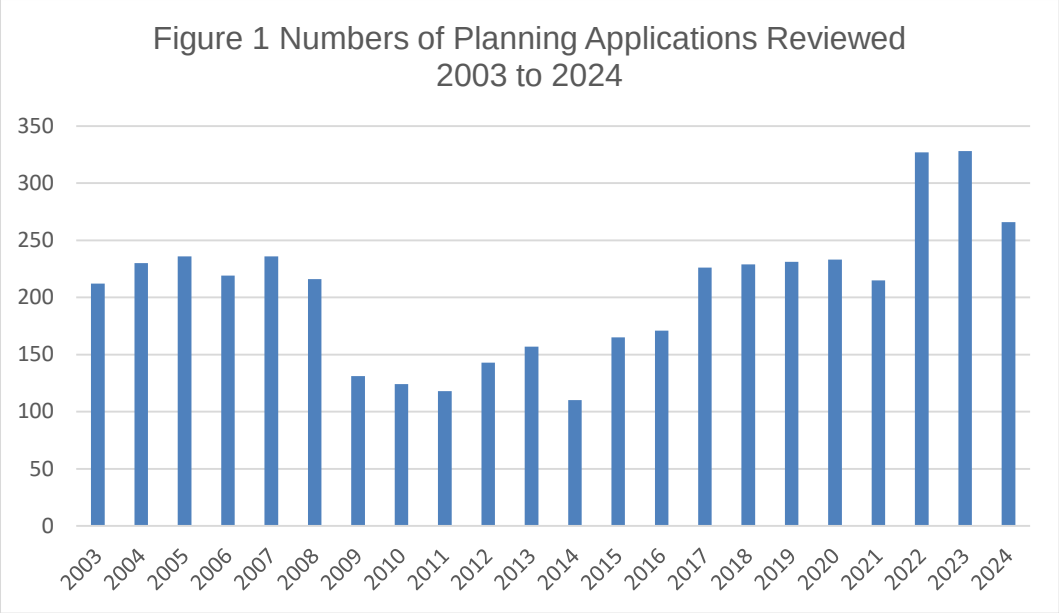
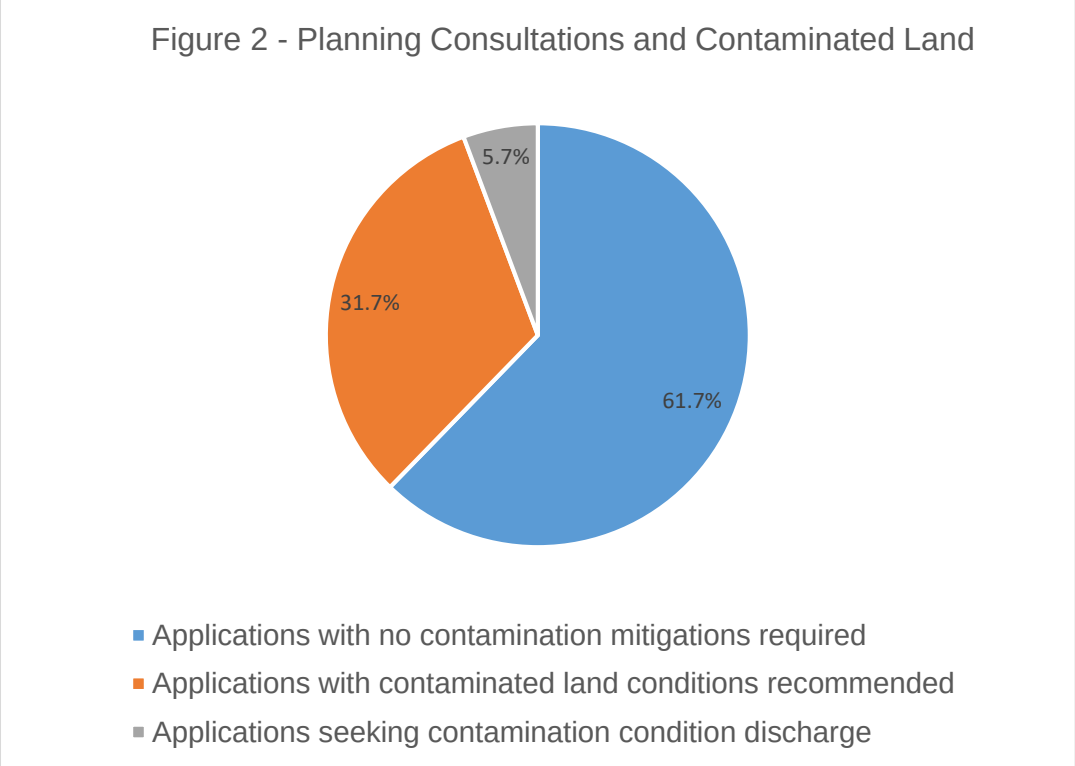


Figure 2 below illustrates the proportion of planning application consultations which resulted in recommendations for contamination mitigation. Note that the data in figure 2 is based on analysis from a single representative year of consultations (in 2020).



The National Planning Policy Framework makes it clear that planning conditions should be kept to a minimum. Therefore, any consultation responses which seek to impose a planning condition must make a sufficiently compelling case and must demonstrate that the need meets the six tests set out in planning policy guidance, namely that the conditions are:

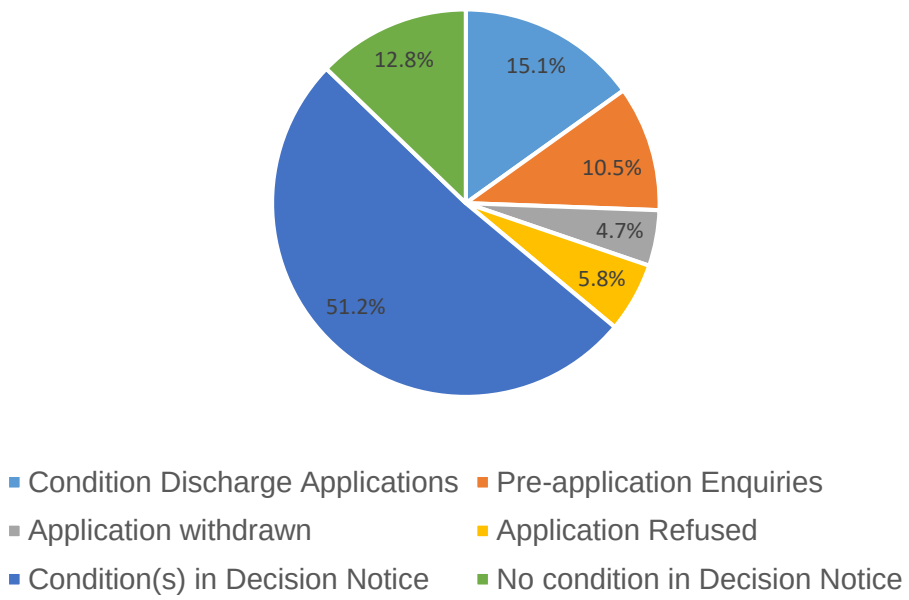
1. necessary.

2. relevant to planning.
3. relevant to the development to be permitted.
4. enforceable.
5. precise; and
6. reasonable in all other respects.

Planning Officers have to make the decision, based on the consultation responses received and all other considerations, about whether to impose contamination related conditions if an application is approved.

Figure 3 illustrates the relative proportion of the outcome of planning applications after a contamination condition had been recommended by the environmental health consultee.

Figure 3 Outcomes Following Contamination Consultations on Planning Applications



The data in Figures 1 to 3 illustrate that:

- Annually, between 120 and 330 planning applications are assessed for their potential impacts on land contamination.
- 38% of planning applications which are assessed for their potential impacts on land contamination, receive constructive feedback with proposals to address the potential residual risk from land contamination.
- 87% of planning applications in which consultees recommend that the planning process deal with potential land contamination legacy are either dealt with by this route or do not progress through to permission for other reasons.

This data provides a high degree of assurance that Objective 3 of this Strategy (see section 2.2) is being met.

During the process of generating the data for Figure 2 it was noted that officers did not object to any planning applications as a result of concerns about land contamination. This reflects how officers are seeking to find workable solutions to balance the demands for economic growth through land redevelopment and the need to protect communities who may be affected by this redevelopment of contaminated sites.

The outcomes of the work to deliver Objective 3 is summarised below

Summary of Work Carried Out to Date

Planning
Since 2003, 4,494 planning applications have been assessed for their potential impact on Part 2A. An estimated 2,800 planning applications have been subject to comments, intervention or conditions through the development control process. An estimated 250 planning applications seeking discharge of conditions relating to contamination conditions have been submitted. It is estimated that planning conditions to mitigate land contamination risk have been included in 2,300 decision notices.

4.1.2 Part 2A Assessments

Work on the Strategic Inspection process (Stages 3 and 4 above) began in 2003. The most recent substantive review of the Strategic Inspection database was carried out in 2017.

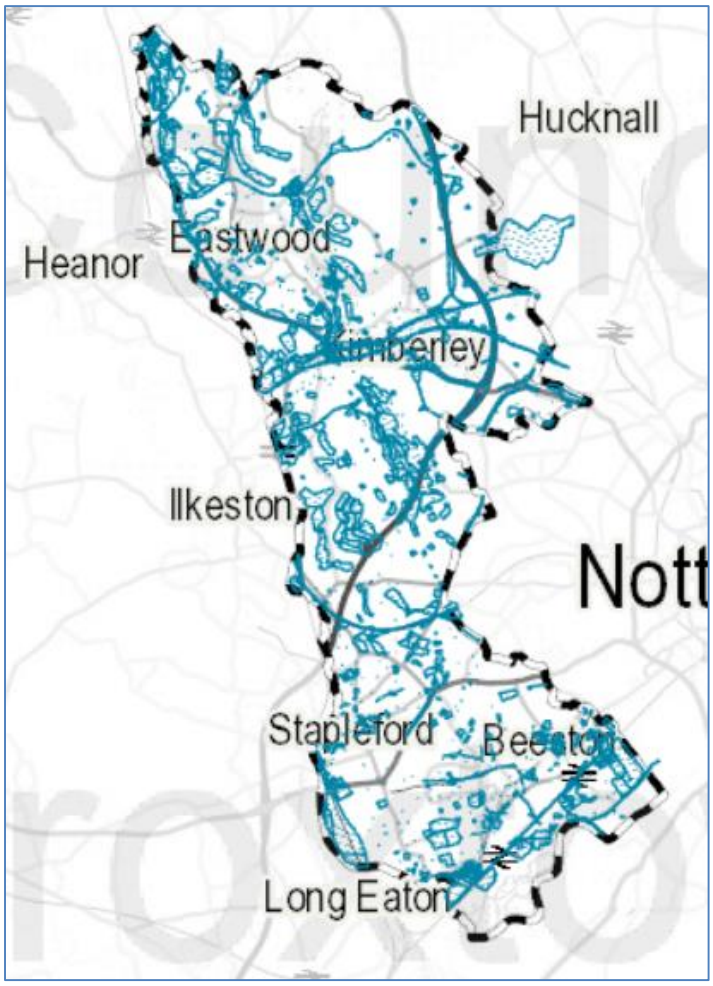
The outputs from the Strategic Inspections are summarised below.

Summary of Worked Carried Out to Date

Part 2A
Total area of Broxtowe Borough 80.08km^2 1,553 sites identified and prioritised covering an estimated area of 8.1km^2 3 sites have been subject to Detailed Inspections No sites have been determined as ‘contaminated’.

Figure 4 below provides an illustration of all of the land which has been subject to the risk assessment process described in this Strategy.

Figure 4 Areas subject to risk assessment in Broxtowe



The table below provides a summary of the diversity of former industrial uses which have been identified through the Strategic Inspection process and the relative numbers of different industry types which have been identified.

Industry Type Description	No of Sites Identified
Animal and animal products processing	7
Ceramics, cement and asphalt manufacturing works	20
Chemical works: Coatings (paints and printing inks)	1
Dockyards and docklands	2
Engineering works: aircraft manufacturing works	1
Electrical & electronic equipment manufacturing works	10
Mechanical engineering and ordnance work	7

Gas works, coke works, coal carbonisation plants	2
Metal manufacturing: Iron and steelworks	34
Metal manufacturing, refining and finishing works: Lead works	1
Pulp and paper manufacturing works	3
Railway land	216
Road vehicles: Garages and filling stations	42
Road Vehicles: Transport and haulage centres	46
Sewage works and sewage farms	14
Textile works and dye works	29
Timber products manufacturing works	14
Waste: Landfills and other waste treatment & disposal	15
Waste recycling, treatment & disposal: Metal recycling	6
Dry cleaners	2
Printing and bookbinding works	4
Machinery: engines, building & general industrial	2
Electricity production & distribution	197
Unknown Filled Ground (Pond, marsh, river, stream, etc)	6
Mining & quarrying general	46
Unknown Filled Ground (Pit, quarry etc)	302
Factory or works - use not specified	125
Heap, unknown constituents	10
Mining of coal & lignite	63
Food processing	6
Cemetery or Graveyard	9
Military Land	5
Brewing & malting	6
Former Marsh	1
Air Shafts	5
Chemical manufacturing general	1

Coal storage and depot	3
Pumping station	2
Water works	1
Unknown	219

4.2 Funding for Inspections

Local authorities are required to investigate potentially contaminated sites in accordance with the Statutory Guidance and, where necessary, at their own expense. Where sufficient evidence is obtained to conclude that sites are 'contaminated' then the" polluter pays" principle will apply, should more investigations, prevention or clean-up ("remediation") be necessary. Where the polluter cannot be found or is otherwise not liable, the current owner/occupier may become liable. Where no responsible person(s) can be found, the local authority may be required to undertake this work at their own expense.

Prior to April 2014, local authorities were able to apply for DEFRA funding from the Contaminated Land Capital Grants Scheme in such situations. However, funding has been reduced in recent years, from £17.5m in 2009/10 to £0.4m for 2016/17; DEFRA have now ceased supporting these costs altogether via the capital grant programme.

However, the Council still has a statutory duty to investigate and, where necessary, remediate Contaminated Land. Consequently, should any relevant sites now come to the Council's attention, and should investigation and/or remediation by the local authority be required under Part 2A, this will need to be funded entirely from the Council's existing budgets.

This, like many statutory functions delegated to local authorities, is a residual risk. This risk is potentially very significant as site investigations can be very expensive (running into the tens or hundreds of thousands) and take many months should intrusive sampling be required. Remediation of sites can run into £millions. The significance of this risk is considered to be 'medium' for the purposes of the Council corporate risk register on the basis that no evidence has emerged of the Council becoming liable for the remediation of a contaminated land site, but investigation costs could arise. Should this become the case, applications for additional funding (revenue or capital or other funding sources (such as UKSPF) will be pursued.

Should any liabilities emerge as a result of any sites emerging as priorities from either the Strategic or Detailed assessment processes, Broxtowe Borough Council may be able to recover some or all of the costs of remediation from the polluter or current owner/occupier of the land although this may take many years. Any pursuit of costs would need to be in accordance with the guidance, on a case by-case basis and avoiding undue hardship.

Previous desk study and intrusive investigations have been undertaken when finding was available, and some have been supported by Planning and Economic Development in order to gain further evidence of whether sites are suitable for alternative development or to facilitate our own site developments. Where remediation of our own land is required due to development of a different end use (such as old garage sires for housing), the cost of this is incorporated into the project costs.

5 Action Plan 2025 - 2030

The majority of sites impacted by land contamination will continue to be dealt with via the planning regime.

2025: Review the system used for contaminated land prioritisation and renew or replace as identified. If the system is to be replaced, there will need to be a project plan to implement any changes and retain/transfer the data as appropriate.

We will explore options to ensure land dealt with via the planning regime can be recorded on our data management system and cross referenced with the prioritised list of sites. This will ensure the prioritised list of sites is kept up to date and we can record the number of sites dealt with via the planning regime each year.

Work can then continue on reviewing the prioritisation list and assessing the current highest priority sites to see if further detailed and intrusive investigations are required. It is likely that the highest priority sites will take the longest to assess and by definition are the sites most likely to require further work.

6 Review of the Strategy Document

Following the Strategy being formally adopted and published, the Council has a duty to keep it under periodic review.

If significant changes to the Strategy are required, it may be appropriate to carry out further annual reviews. If no major changes are necessary the Strategy will remain in place for the period of the work plan, in which case the next full review date will be 2030.

7 References

Contaminated Land Statutory Guidance, DEFRA, 2012

Contaminated Land Inspection Strategies, Technical Advice for Local Authorities, DETR (Draft for comments April 2000)

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Some Guidance on the use of Digital Environmental Data; BGS Technical Report WE/99/14; March 2000; British Geological Survey and the Environment Agency.

Nottingham, England and Wales Sheet 126; Solid and Drift Edition; 1:50,000 Map; 1996; British Geological Survey.

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Appendix I

Characteristics of the Borough

This Appendix gives background information about Broxtowe Borough and highlights some of the factors, in relation to contaminant linkages, that will influence the Councils approach to the inspection of contaminated land.

2.1 Geographical Characteristics

Broxtowe Borough lies on the west side of the Nottingham conurbation. It is bounded to the east by the City of Nottingham, to the north and south by the districts of Ashfield and Rushcliffe respectively, and to the west by the towns of the Erewash Valley in Derbyshire.

The population of Broxtowe at the 2021 Census was estimated to be 110,813. The bulk of the population is concentrated in the urban areas which centre in Beeston, Stapleford, Eastwood and Kimberley. Beeston and Stapleford form part of the more built-up southern part of the borough, where approximately two thirds of its population live. Eastwood and Kimberley are separate towns surrounded by an area which is more rural in character, containing several villages.

The northern settlements developed in association with coal mining, although there are now no active collieries in the area. As a consequence of this decline considerable physical, economic and social change has occurred in tandem with extensive recent housing and industrial development. The towns in the south of the borough, whilst historically related to the textile industry of the Nottingham area and the Erewash Valley, have developed as part of the wider built-up area around Nottingham and include extensive post-war residential development.

2.1.1 Mineral extraction

Mining for coal was well established in the northern half of the borough, particularly along the Erewash valley, by the 15th century using small bell pits. In the 18th and 19th centuries these shallow workings became exhausted and larger deeper mines were sunk. The last deep mined coal was raised at Moorgreen in 1985 and there are now no active collieries in the borough.

Opencast mining has also taken place extensively as much of the northern part of the borough is on the exposed coalfield, where the coal seams can be found just below the subsoil. In connection with the opencast operations a number of dedicated blending, stocking and loading facilities were provided. Currently no open casting is being carried out in the borough.

Whilst much of the dereliction associated with the mining operations has been dealt with, in some cases reclamation has been combined with an opencast scheme (e.g.

Moorgreen colliery and Cossall). However, potential gas migration and ground stability still need to be taken into account when any building work takes place.
Sharp sand and gravel have been worked at Attenborough but the site has now become a nature reserve.

Bricks were manufactured at a number of sites in the borough and the associated clay pits have been used as landfills.

2.1.2 Railways

Rail development within the borough was largely influenced by the coal mining industry after the initial connection of Nottingham and Derby in 1839 by a line running through Beeston and Attenborough. This route now forms part of the current main line from Nottingham to London. Further development of the Midland Railway company resulted in the Erewash Valley line running along the Western boundary of the borough with a large marshalling yard and associated facilities at Toton, and a cut off route from Trowell to Nottingham principally for passenger trains. These routes are still in use, however, there are now areas of derelict land around the Toton site and some abandoned associated branch lines such as Bennerley – Kimberley – Watnall.

Vested coal and iron interests brought a second railway network to the borough in the 1870's. This was the Great Northern Railway in association with the Stanton Ironworks Company and various coal owners. This system included a second route for Nottingham to Derby via Kimberley as well as a second route up the Erewash Valley from Awsworth through Eastwood, plus some associated branch lines. These railways were abandoned completely by 1970 and while some sections remain derelict, others have been used as landfill sites, footpaths or redevelopment. Additionally, an extensive private rail system was operated by Barber Walker and Company of Eastwood (Later the National Coal Board). This connected Langley Mill, Underwood, Eastwood and Watnall, and was closed in stages between 1956 and 1985.

2.1.3 Light industry

Light industry in the form of textiles, electrical and pharmaceutical manufacturers historically dominated the southern part of the borough and, whilst some decline has taken place, many of these sites are still in operation. Currently, working practices and pollution controls ensure that any new contamination is minimal, and historic contamination is being dealt with as and when sites are redeveloped.

2.1.4 Ministry of Defence land

A large area of land in Chilwell came under the control of the Ministry of Defence (MOD) during World War One, and since 1990 parcels have been released for redevelopment. Remediation has been undertaken on each piece of land by the developer in agreement with the Council. Redevelopment is still on going and a considerable area remains in MOD ownership with further development expected in the lifetime of this strategy.

2.1.6 Protected locations

There are a wide range of protected habitats across the borough, including:

- 7 Sites of Special Scientific Interest (SSSI's) protected under the Wildlife and Countryside Act 1981 and Countryside and Rights of Way Act 2000.
- 15 local nature reserves.

As well as its rich natural habitat and diversity, the borough has a significant historic built environment with:

- 153 listed buildings
- 6 ancient monuments
- 16 designated Conservation Areas.

2.1.7 Key surface water bodies and river network

The southern boundary of the borough is formed by the River Trent and the western boundary closely follows the River Erewash for much of its length. Additionally, a large reservoir is present at Moorgreen, and large man-made lakes created at Attenborough by mineral extraction, now form the Attenborough Nature Reserve.

2.2 The Geology of the Borough

2.2.1 Drift geology (unconsolidated deposits)

Alluvial deposits form the surface geology of the southern extremity of the borough taking in Beeston and Attenborough down to the southern boundary of the River Trent as well on a thin strip immediately alongside the River Erewash on the western boundary.

These types of deposits are associated with rivers and often comprise sandy material which allows ready passage of water, or water borne contaminants. Additionally, marshland often found adjacent to watercourses, is likely to be a source of methane and other gases associated with vegetation.

2.2.2 Solid geology (bedrock)

The solid rocks underlying the Alluvial deposits in the south of the borough are Permo-Triassic Sandstones which extend to form the surface geology of the rest of Beeston, Chilwell, Toton and much of Stapleford as well as the north eastern edge of the borough. These rocks form part of the principal aquifer, which extends eastwards across the rest of Nottinghamshire, and is used as a source of potable water.

From an ancient geological line passing through the north of Stapleford, and above Bramcote, Coal Measures are to be found at the surface and have been the subject of both opencast and underground coal workings, although currently no extraction is taking place.

The general dip of the strata is from west to east with the Coal Measures continuing under the Permo-Triassic rocks on the eastern boundary of the borough.

2.2.3 Hydro geology (water pathways and groundwater receptors)

The drift deposits in the south of the borough connect with the Permo-Triassic rocks below to form a pathway for water and possible contaminants into the ground water, used on a supply of potable water further east.

The Coal Measures which allow the passage of water as well as contaminants, extend beneath the Permo-triassic. However, these are not generally used as supply of water because of their acidic nature caused by both the rocks and past mining activity.

2.2.4 Possible sources of contamination

Within the Coal Measures acid water is present both in the form of surface water entering via old mine workings, and the associated disturbed strata as well as water trapped present since the formation of the rocks. Springs are also common in this formation and therefore may give rise to contaminated surface water flows.

Additionally, various gasses are usually present in both the Coal Measures (methane released from coal, carbon dioxide) and Drift deposits close to rivers.

2.2.5 Pathways for contamination

The borough is covered by soils of high permeability meaning that they readily allow water or contamination to pass to the rock below. All of the solid and drift geology below the surface soils can act as pathways for contamination but the most important pathway is via the drift deposits and the Permo-Triassic rocks as this will affect the potable water supply further east.

2.2.6 Geological receptors for contamination

The principal receptor for contamination is the Permo-Triassic strata as already mentioned because of implications for the water supply. Both the River Trent and River Erewash are also receptors as are any other watercourses.

Technical Appendices

Technical Appendix A

General Principles and Definitions of the Part 2A Process for Land Contamination

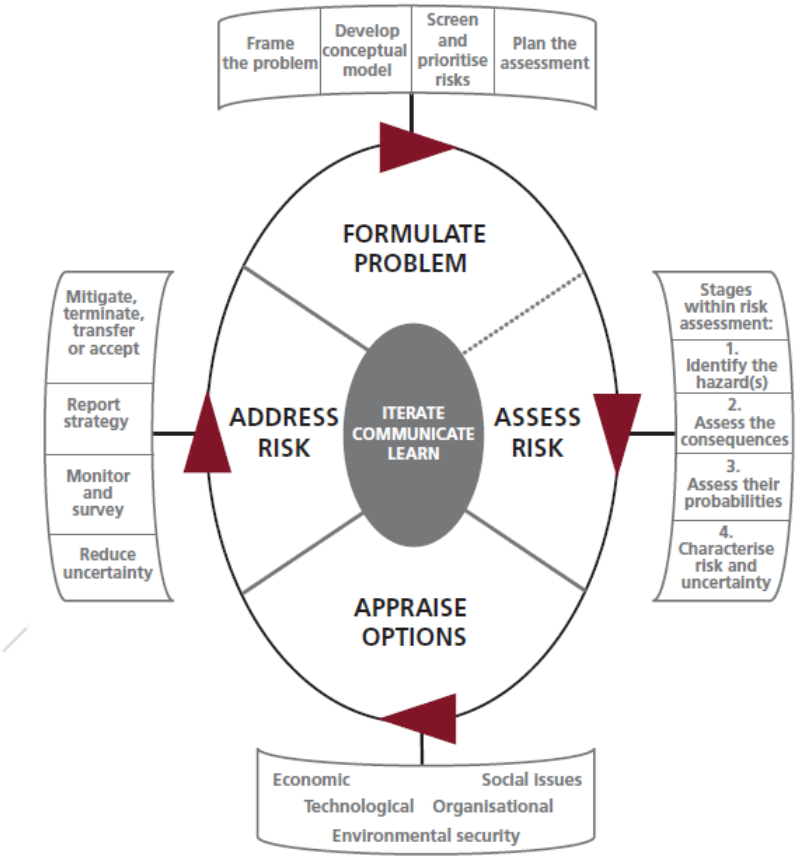
Principles and Definitions

General Principles of risk assessment

The statutory guidance promotes a risk-based approach to dealing with potentially contaminated land in the UK; based on the approach set out in *'Guidelines for Environmental Risk Assessment and Management – Green Leaves III'.* (See below)

The aim of this type of approach is to protect human health and the environment without unnecessarily wasting finances on the clean-up of all contamination. The need for and extent of any remediation is determined from an assessment of the risks posed to human health and the environment, whilst taking into account the current use of the site.

This 'suitable for use' approach acknowledges that the risk which is presented by a level of contamination will largely be dependent upon the use of the land in addition to other site-specific factors. Accordingly, risks need to be assessed on a site-by-site basis.



Source- Guidelines for Environmental Risk Assessment and Management – Green Leaves III; Cranfield University; Defra, 2011

A framework for environmental risk assessment and management

The Three Tiers of Assessment

The principles of risk assessment used in land contamination fit within a tiered assessment structure set out in *Green Leaves III*. The tiers are applied to the circumstances of the site under consideration with an increasing level of detail required by the assessor in progressing through the tiers.

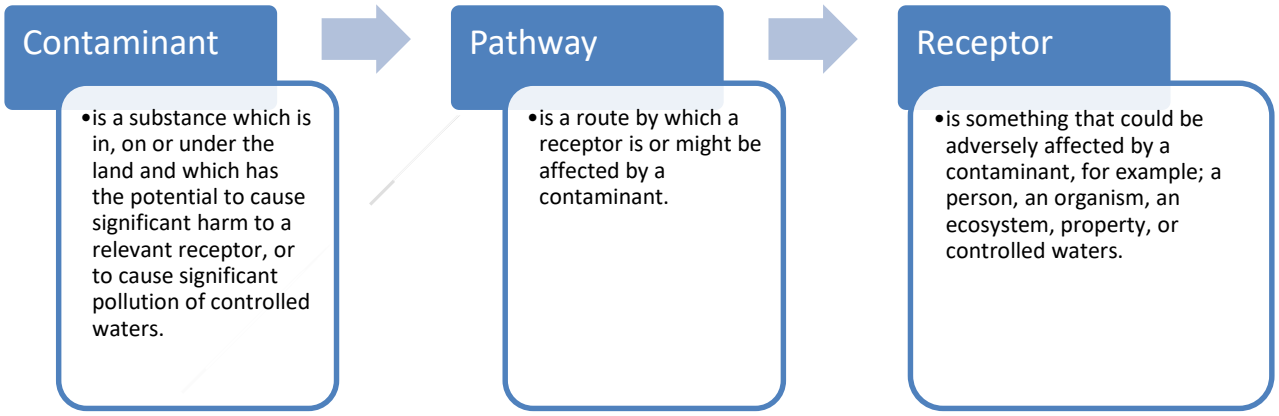
The three tiers used in the specific context of land contamination are:

1. Preliminary risk assessment.
2. Generic quantitative risk assessment.
3. Detailed quantitative risk assessment.

Once the need for risk assessment has been identified, it will always be necessary to carry out a preliminary risk assessment. However, depending on the circumstances and the outcome, it may not be necessary to carry out further risk assessment, or it may be appropriate to use only one of the two approaches to quantitative risk assessment rather than both.

The Contaminant Linkage

For contaminated land to be so designated there must exist one or more 'contaminant linkage(s)' by which a relevant receptor might be affected by the contaminants in question; this linkage consists of:

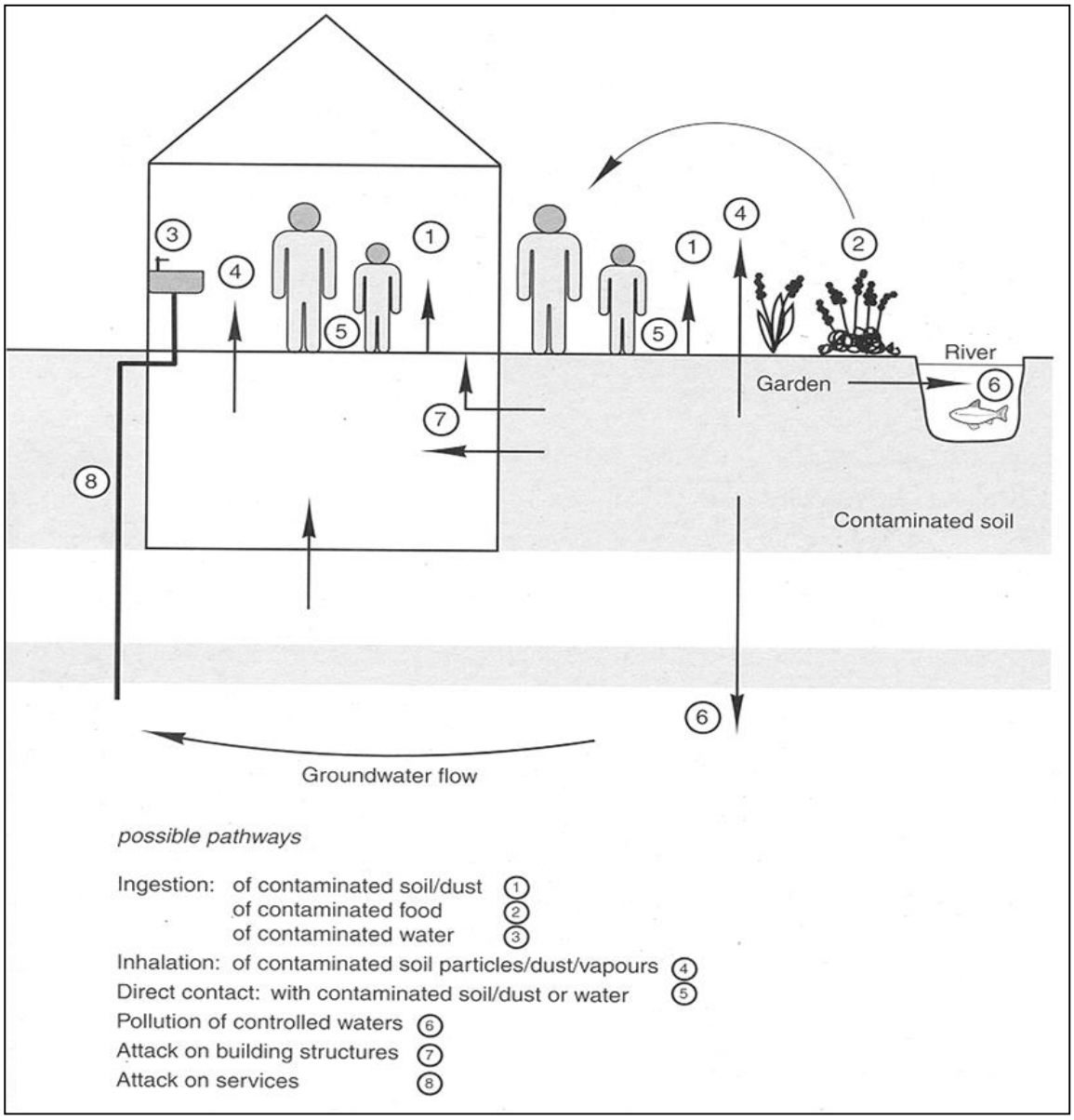


The term "contaminant linkage" therefore refers to the relationship between a contaminant, a pathway and a receptor. All three elements of a contaminant linkage must exist in relation to particular land before the land can be considered potentially to be contaminated land under Part 2A, including evidence of the actual presence of contaminants.

The term "significant contaminant linkage", as used in the Statutory Guidance, means a contaminant linkage which gives rise to a level of risk sufficient to justify a piece of land being determined as contaminated land.

The Conceptual Site Model

The process of risk assessment involves understanding the risks presented by land, and the associated uncertainties. In practice, this understanding is usually developed and communicated in the form of a "*conceptual site model*" (CSM) which indicates all the contaminant linkages and uncertainties associated with each.



Source- Guidance for the Safe Development of Housing on Land Affected by Contamination; Environment Agency and the NHBC; 2nd edition. R&D Publication 66; 2008.

Simple Conceptual Model of the Contaminant Linkage(s)

The Part 2A Risk Assessment Process

The Statutory Guidance recognises that there are two broad types of "inspection" likely to be carried out by local authorities:

(a) strategic inspection, for example collecting information to make a broad assessment of land within an authority's area and then identifying priority land for more detailed consideration (also known as prioritisation); and
(b) carrying out the detailed inspection of particular land to obtain information on ground conditions and carrying out the risk assessments which support decisions under the Part 2A regime relevant to that land.

This document refers to the former as "strategic inspection" (**Technical Appendix C**) and the latter as "detailed inspection" (**Technical Appendix D**).

The inspection process is carried out through a staged process of understanding of the risks starting with the strategic inspection and then moving onto detailed inspection; involving a preliminary risk assessment informed by desk-based study; a site visit and walkover; a generic quantitative risk assessment; and various stages of more detailed quantitative risk assessment.

The process should normally continue until it is possible for the local authority to decide:

(a) that there is insufficient evidence that the land might be contaminated land to justify further inspection and assessment; and/or
(b) Whether or not the land is contaminated land.

For land to proceed to the next stage of risk assessment there should be evidence that an unacceptable risk could reasonably exist. If the authority considers there is little reason to consider that the land might pose an unacceptable risk, inspection activities should stop at that point.

Definition of Contaminated Land under Part 2A

The definition of contaminated land is given in section 78A (2) of Part 2A as follows:

any land which appears to the LOCAL AUTHORITY in whose area it is situated to be in such a condition by reason of substances in, on or under the land, that

a) SIGNIFICANT HARM is being caused or there is a SIGNIFICANT POSSIBILITY of such harm being caused; or

b) SIGNIFICANT POLLUTION OF CONTROLLED WATERS is being caused or there is a SIGNIFICANT POSSIBILITY of such pollution being caused.[1]

Where harm is attributable to radioactivity, the definition of Contaminated Land has been modified by regulation 4(a) of the Modification Regulations[2] as:

any land which appears to the LOCAL AUTHORITY in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that

a) HARM is being caused, or

b) there is a SIGNIFICANT POSSIBILITY of such harm being caused

These definitions aim to enable the identification and remediation of land on which contamination is causing unacceptable risks to human health or the wider environment. Accordingly, the definition does not include all land where contamination may be present.

Significant Harm to Human Health

Section 78A (4) defines 'harm' as 'harm to the health of living organisms or other interference with the ecological systems of which they form part and, in the case of man, includes harm to his property'.

Harm in the context of radiation is defined in section 78A (4) (as modified) as:

'lasting exposure to any person resulting from the after-effects of a radiological emergency, past practice or past work activity'.

Conditions for determining that land is contaminated land on the basis that significant harm is being caused would exist where:

(a) the local authority has carried out an appropriate, scientific and technical assessment of all the relevant and available evidence; and
(b) on the basis of that assessment, the authority is satisfied on the balance of probabilities that significant harm is being caused by a significant contaminant(s).

The following health effects should always be considered to constitute significant harm to human health:

- death.
- life threatening diseases (e.g. cancers).
- other diseases likely to have serious impacts on health.

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[1] Changes to the definition for Controlled Waters were brought in via the Water Act 2003 section 86. The Water Act 2003 (Commencement No. 11) Order 2012 (SI 2012/264).

[2] Radioactive Contaminated Land (Modification of Enactments) (England) Regulations 2006

- serious injury[3];
- birth defects.
- and impairment of reproductive functions.

Other health effects may be considered by the local authority to constitute significant harm. For example, a wide range of conditions may or may not constitute significant harm (alone or in combination) including:

- physical injury.
- gastrointestinal disturbances.
- respiratory tract effects.
- cardio-vascular effects;
- central nervous system effects.
- skin ailments.
- effects on organs such as the liver or kidneys.
- or a wide range of other health impacts.

In deciding whether or not a particular form of harm is significant harm, the local authority should consider the seriousness of the harm in question: including the impact on the health, and quality of life, of any person suffering the harm; and the scale of the harm.

The authority should only conclude that harm is significant if it considers that treating the land as contaminated land would be in accordance with the broad national objectives of the regime as described in Section 1.1.1.

Significant Possibility of Significant Harm (SPOSH)

In deciding whether or not a significant possibility of significant harm to human health exists, the local authority should first understand the *possibility of significant harm* (POSH) from the relevant contaminant linkage(s) and the levels of uncertainty attached to that understanding; before it goes on to decide whether or not the possibility of significant harm is significant.

The Statutory Guidance defines the term “possibility of significant harm” as it applies to human health, as being the risk posed by one or more relevant contaminant linkage(s) relating to the land. It comprises:

(a) The estimated likelihood that significant harm might occur to an identified receptor, taking account of the current use of the land in question.
(b) The estimated impact if the significant harm did occur i.e. the nature of the harm, the seriousness of the harm to any person who might suffer it, and (where relevant) the extent of the harm in terms of how many people might suffer it.

In estimating the likelihood that a specific form of significant harm might occur the local authority should, among other things, consider:

(a) The estimated probability that the significant harm might occur:
    i. if the land continues to be used as it is currently being used; and

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[3] Physical injury in relation to significant harm would include injury caused by chemical and biochemical properties of substances, such as injury resulting from explosive or asphyxiating properties of gases. It would not extend to injury caused by only physical properties of substances, such as injury caused by falling onto sharp or hard objects made of relevant substances.

ii. where relevant, if the land were to be used in a different way (or ways) in the future having regard to the guidance on "current use".

(b) The strength of evidence underlying the risk estimate. It should also consider the key assumptions on which the estimate of likelihood is based, and the level of uncertainty underlying the estimate.

When does POSH become SPOSH?

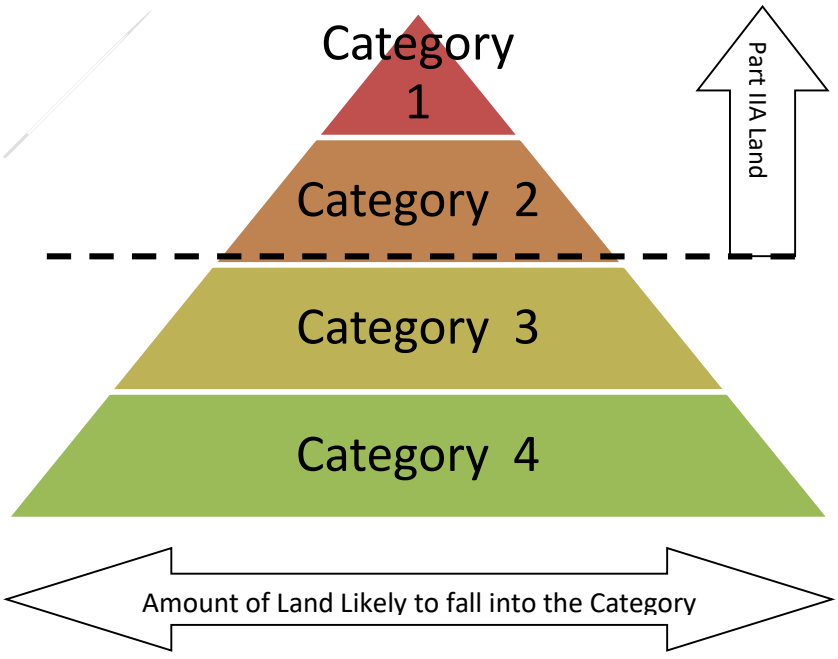
In deciding whether the possibility of significant harm being caused is significant, the local authority is deciding whether the possibility of significant harm posed by contamination in, on or under the land is sufficiently high that regulatory action should be taken to reduce it, with all that would entail. In taking such decisions, the local authority should take account of the broad national aims of the regime set out in Section 1.1.1.

Coming to the decision that SPOSH is being caused is a complex one which will require multiple lines of evidence to assist the Local Authority in making the determination. Starting from the position that the land is not 'contaminated' the Local Authority should build a case based on robust scientific evidence and the principles found in the Statutory Guidance.

The Statutory Guidance indicates that the local authority should use the following categorisations in their assessments:

Categories 1 and 2: would encompass land which is capable of being determined as contaminated land on grounds of significant possibility of significant harm to human health.

Categories 3 and 4: would encompass land which is not capable of being determined on such grounds.



Schematic of the Human Health Categorisation

Human Health Categorisation (after: Sections 4.19 – 4.25 of Statutory Guidance 2012)

Category 1	Category 2	Category 3	Category 4
Land should be deemed to be a Category 1: Human Health case where: (a) the authority is aware that similar land or situations are known, or are strongly suspected on the basis of robust evidence, to have caused such harm before in the United Kingdom or elsewhere; or (b) the authority is aware that similar degrees of exposure (via any medium) to the contaminant(s) in question are known, or strongly suspected on the basis of robust evidence, to have caused such harm before in the United Kingdom or elsewhere. (c) the authority considers that significant harm may already have been caused by contaminants in, on or under the land, and that there is an unacceptable risk that it might continue or occur again if no action is taken. Among other things, the authority may decide to determine the land on these grounds if it	Land should be placed into Category 2 if the authority concludes, on the basis that there is a strong case for considering that the risks from the land are of sufficient concern, that the land poses a significant possibility of significant harm, with all that this might involve and having regard to Section 1 of the Statutory Guidance. Category 2 may include land where there is little or no direct evidence that similar land, situations or levels of exposure have caused harm before, but nonetheless the authority considers on the basis of the available evidence, including expert opinion, that there is a strong case for taking action under Part 2A on a precautionary basis.	Land should be placed into Category 3 if the authority concludes that the strong case described in Section 4.25(a) of the Statutory Guidance does not exist, and therefore the legal test for significant possibility of significant harm is not met. Category 3 may include land where the risks are not low, but nonetheless the authority considers that regulatory intervention under Part 2A is not warranted. This recognises that placing land in Category 3 would not stop others, such as the owner or occupier of the land, from taking action to reduce risks outside of the Part 2A regime if they choose. The authority should consider making available the results of its inspection and risk assessment to the	Land should be deemed to be a Category 4: Human Health case where: (a) Land where no relevant contaminant linkage has been established. (b) Land where there are only normal levels of contaminants in soil, as explained in Section 3 of the Guidance. (c) Land that has been excluded from the need for further inspection and assessment because contaminant levels do not exceed relevant generic assessment criteria in accordance with Section 3 of the Guidance, or relevant technical tools or advice that may be developed in accordance with paragraph 3.30 of the Guidance. (d) Land where estimated levels of exposure to contaminants in

considers that it is likely that significant harm is being caused, but it considers either: (i) that there is insufficient evidence to be sure of meeting the "balance of probability" test for demonstrating that significant harm is being caused; or (ii) that the time needed to demonstrate such a level of probability would cause unreasonable delay, cost, or disruption and stress to affected people particularly in cases involving residential properties.		owners/occupiers of Category 3 land.	soil are likely to form only a small proportion of what a receptor might be exposed to anyway through other sources of environmental exposure (e.g. in relation to average estimated national levels of exposure to substances commonly found in the environment, to which receptors are likely to be exposed in the normal course of their lives).

In making its decision on whether land falls into Category 2 or Category 3, the local authority should first consider its assessment of the possibility of significant harm to human health, including:

- the estimated likelihood of such harm,
- the estimated impact if it did occur,
- the timescale over which it might occur,
- and the levels of certainty attached to these estimates.

If the authority considers, on the basis of this consideration alone, that the strong case described in **Error! Reference source not found.** *'Category 2'* does or does not exist, the authority should make its decision on whether the land falls into Category 2 or Category 3 on this basis regardless of the other factors discussed below.

If the authority considers that it cannot make a decision based on the above, it should consider other factors which it considers are relevant to achieving the national objectives set out in Section 1.1.1. This should include consideration of:

(a) The likely direct and indirect health benefits and impacts of regulatory intervention. This would include:
   i. benefits of reducing or removing the risk posed by contamination.
   ii. any risks from contaminants being mobilised during remediation.
   iii. and any indirect impacts such as stress-related health effects that may be experienced by affected people, particularly local residents.

   If it is not clear to the authority that the health benefits of remediation would outweigh the health impacts, the authority should presume the land falls into Category 3 unless there is strong reason to consider otherwise.

(b) The authority's initial estimate of what remediation would involve;
   i. how long it would take,
   ii. what benefit it would be likely to bring,
   iii. whether the benefits would outweigh the financial and economic costs,
   iv. any impacts on local society or the environment from taking action that the authority considers to be relevant.

If, having taken the above factors into account, the local authority still cannot decide whether or not a significant possibility of significant harm exists, it should conclude that the legal test has not been met, and the land should be placed in Category 3.

Significant Harm to other Receptors

In considering non-human receptors, the local authority should only regard receptors described in Statutory Guidance Tables 1 and 2 (Appendix IV) as being relevant for the purposes of Part 2A (e.g. harm to an ecological system outside the description in Table 1 should not be considered to be significant harm).

Similarly, in considering whether significant harm is being caused or there is a significant possibility of such harm, the authority should only regard the forms of harm described in Tables 1 and 2 as being relevant.

Pollution of Controlled Waters

The Council will also act in accordance with statutory guidance in determining whether pollution of controlled waters is being or is likely to be caused. Section 78A (9) defines the pollution of controlled waters as: 'the entry into controlled waters of any poisonous, noxious or polluting matter or any solid waste matter'.

Section 78A (9) was amended by section 86 of the Water Act 2003 so that for Part 2A purposes "ground waters" does not include waters contained in underground strata but above the saturation zone (often known as the "unsaturated zone")[4].

The definition of Contaminated Land where attributable to radioactivity does not currently cover any pollution of controlled waters. This approach reflects the Government's wish to assess the implications of the Water Framework Directive (2000/60/EC) before considering how a significance test might be applied.

Significant Pollution of Controlled Waters

The following types of pollution should be considered to constitute significant pollution of controlled waters:

(a) Pollution equivalent to "environmental damage" to surface water or groundwater as defined by The Environmental Damage (Prevention and Remediation) Regulations 2009, but which cannot be dealt with under those Regulations.
(b) Inputs resulting in deterioration of the quality of water abstracted, or intended to be used in the future, for human consumption such that additional treatment would be required to enable that use.
(c) A breach of a statutory surface water Environment Quality Standard, either directly or via a groundwater pathway.
(d) Input of a substance into groundwater resulting in a significant and sustained upward trend in concentration of contaminants (as defined in Article 2(3) of the Groundwater Daughter Directive (2006/118/EC)).

The local authority may consider that the following types of pollution may constitute significant pollution:

(a) Significant concentrations of hazardous substances or non-hazardous pollutants in groundwater; or

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[4] This change was brought into force on 1 October 2004 by the Water Act 2003 (Commencement Order No.2, Transitional Provisions and Savings) Order 2004 (S.I. 2004/2528 (C.106).

(b) Significant concentrations of priority hazardous substances, priority substances or other specific polluting substances in surface water; at an appropriate, risk-based compliance point.

The local authority should only conclude that pollution is significant if it considers that treating the land as contaminated land would be in accordance with the broad national objectives of the regime as described in Section 1.1.1.

This would normally mean that the authority should conclude that less serious forms of pollution are not significant.

Significant Possibility of Significant Pollution to Controlled Waters

The local authority should first understand the possibility of significant pollution of controlled waters posed by the land, and the levels of certainty/uncertainty attached to that understanding, before it goes on to decide whether or not that possibility is significant.

The term “possibility of significant pollution of controlled waters” means the estimated likelihood that significant pollution of controlled waters might occur.

Before making its decision on whether a given possibility of significant pollution of controlled waters is significant, the local authority should consider:

(a) The estimated likelihood that the potential significant pollution of controlled waters would become manifest; the strength of evidence underlying the estimate; and the level of uncertainty underlying the estimate.
(b) The estimated impact of the potential significant pollution if it did occur. This should include consideration of whether the pollution would be likely to cause a breach of European water legislation or make a major contribution to such a breach.
(c) The estimated timescale over which the significant pollution might become manifest.
(d) The authority’s initial estimate of whether remediation is feasible, and if so what it would involve and the extent to which it might provide a solution to the problem; how long it would take; what benefit it would be likely to bring; and whether the benefits would outweigh the costs and any impacts on local society or the environment from taking action.

The authority should then decide which of the following categories the land falls into. Categories 1 and 2 would comprise cases where the authority considers that a significant possibility of significant pollution of controlled waters exists. Categories 3 and 4 would comprise cases where the authority considers that a significant possibility of such pollution does not exist.

Water Categorisation (after: Section 4.46 of Statutory Guidance 2012)

Category 1	Category 2	Category 3	Category 4
This covers land where the authority considers that there is a strong and compelling case for considering that a significant possibility of significant pollution of controlled waters exists. In particular this would include cases where there is robust science-based evidence for considering that it is likely that high impact pollution (such as the pollution described in paragraph 4.38 of the Statutory Guidance) would occur if nothing were done to stop it.	This covers land where: a. the authority considers that the strength of evidence to put the land into Category 1 does not exist; but b. nonetheless, on the basis of the available scientific evidence and expert opinion, the authority considers that the risks posed by the land are of sufficient concern that the land should be considered to pose a significant possibility of significant pollution of controlled waters on a precautionary basis, with all that this might involve (e.g. likely remediation requirements, and the benefits, costs and other impacts of regulatory intervention).	This covers land where the authority concludes that the risks are such that (whilst the authority and others might prefer they did not exist) the tests set out in Categories 1 and 2 above are not met and therefore regulatory intervention under Part 2A is not warranted. This category should include land where the authority considers that it is very unlikely that serious pollution would occur; or where there is a low likelihood that less serious types of significant pollution might occur.	This covers land where the authority concludes that there is no risk, or that the level of risk posed is low. In particular, the authority should consider that this is the case where: a. no contaminant linkage has been established in which controlled waters are the receptor in the linkage; or b. the possibility only relates to types of pollution described in paragraph 4.40 of the Statutory Guidance; or c. the possibility of water pollution similar to that which might be caused by “background” contamination as explained in Section 3 of the Statutory Guidance.

	Among other things, this category might include land where there is a relatively low likelihood that the most serious types of significant pollution might occur.		

Technical Appendix B

Stage 3

Strategic Inspection. Acquisition and input of data into Geographical Information System (GIS).

Geographical Information System (GIS)
A GIS is a digital system for the storage, manipulation, analysis and visualisation of spatial data. At the heart of a GIS is a database that allows the spatial data (information for which a grid reference can be given e.g. maps) to be linked to attribute data (information about what is at a particular point or area).

Datasets containing both spatial and attribute data can be brought together into a common system, simplifying their analysis. This integration between databases and maps means that a GIS is a powerful tool for the analysis of environmental data. The Council has and will continue to use ArcMap GIS software to enter information about land as it is investigated. The following methods of data ratification and quality control will be employed.

Data Management
Environmental datasets, in both paper and digital form, are an important and valuable resource. They are often unique and irreplaceable and may be expensive to collect. Appropriate data management is therefore, essential to protect this resource.

Quality Assurance of data
Datasets will very rarely be error free. In order to obtain valid conclusions from data it is important to be able to quantify and assess errors. Documentation outlining the quality and reliability of all data, ‘metadata’, is required where possible.

Information Collection

In order to assess the potential for land to be classed as contaminated a large amount of information is required on potential sources, pathways and receptors. The table below outlines the resources utilised.

Resource	**Description**	*Use*
Historic Maps	1880,1900,1915,1940,1960, 1975,1985 Digital maps	To identify sources
OS Mapping	Digital present-day mapping	To identify sources
Aerial Photography	Digital historic and present-day photography	To identify sources
Geological Maps	Solid & Drift, Made Ground and Superficial digital maps.	To characterise sources and pathways
Water Abstractions	Details of public and private water abstractions from EA	To identify pathways and receptors (controlled waters)
Water Courses	Rivers, streams, ponds and lakes. River quality data all from the EA	To identify pathways and receptors (controlled waters)
Groundwater Vulnerability Zones	Aquifer vulnerability digital maps.	To identify receptors (controlled waters)
Groundwater Source Protection Zones	Zones around water abstraction points	To identify receptors (controlled waters)
Radon areas	Areas effected by natural radiation	To identify sources
Nitrate Vulnerable Zones	DEFRA information on sensitive areas	To identify potential receptors
Sites of Special Scientific Interest	Natural England information	To identify potential receptors
Sites of Importance for Nature Conservation	Nottinghamshire Biological and Geological Records Centre lists.	To identify potential receptors
Local Nature Reserves	Councils' own records of sites	To identify potential receptors
Sites containing Protected Species	Nottinghamshire Biological and Geological Records Centre lists.	To identify potential receptors

Sites and Monuments Record	Nottinghamshire County Council	To identify potential receptors
Areas of Industrial Archaeological Interest	Nottinghamshire County Council	To identify potential receptors
Listed Buildings	Councils' own records	To identify potential receptors
Tree Preservation Orders	Councils' own records	To identify potential receptors
Ancient Woodlands	Councils' own records	To identify potential receptors
EPR Installations	Councils' own records	To identify sources
Current Landfill Sites	Councils' own records	To identify sources
Local Plan	Broxtowe Borough Councils plan showing new development	To identify potential receptors
Landfill and Quarrying Records	Information from EA and Councils own records	To identify sources
Petroleum Records	Past and present filling stations	To identify sources
Electrical Sub Stations	Past and present sub stations	To identify sources
Scrap Yards	Past and present scrap yards	To identify sources
Trade Directories Information	Kelly Directories and Yellow Pages to identify potential contaminative uses	To identify sources
Schools/Colleges	Councils' own records	To identify potential receptors
Recreation Grounds/Park Land	Councils' own records	To identify potential receptors
Allotments	Councils' own records	To identify potential receptors

Table 1 - Resources needed to determine potential contaminant linkages

Potential Sources of Contamination

Industrial History

The first step in the process of identifying potentially contaminated sites is to closely examine historical data in the form of old Ordnance Survey plans and photographs from the early part of the century to the present day. These have been obtained from this Council's archives and the County records office.

Current Industry

The present industrial areas of the Borough are potential sources of contamination, and these have been reviewed in accordance with the statutory guidance to establish whether there is a potential of contamination to exist, and, if there is, whether it is controlled by another agency.

Environmental Protection Act 1990 Part I / Pollution Prevention & Control Act

'Part A1' processes permitted under the Environmental Permitting Regulations regulated by the Environment Agency and 'Part A2' processes regulated by the local authority. The EPR Regime should adequately regulate emissions to land and water; however these sites have the potential for historical contamination and need to be adequately managed, particularly in the closure and de-commissioning phases.

There are currently four A1 processes in Broxtowe which hold environmental permits issued by the Environment Agency.

'Part B' processes are permitted under the Environmental Permitting Regulations for air pollution control by Broxtowe Borough Council. There are currently twenty-five installations which hold permits issued by the Council. These installations are only regulated for their atmospheric emissions; however they have the potential to pollute the land.

Hazardous Substances

This Council is a Hazardous Substances Authority for the purposes of the Planning (Hazardous Substances) Act 1990 and the Planning (Hazardous Substances) Regulations 1992. This legislation requires consent to allow the presence on land of hazardous substances above a specified quantity. These regulations were amended by the Planning (Control of Major Accident Hazards) Regulations 1999 (SI 981) to take account of the COMAH Regulations (see below). There are currently four authorised sites in the Borough. The Planning Office maintains a register for this purpose.

COMAH Sites

The Control of Major Accident Hazards Regulations 1999 (SI 743) are enforced by the Environment Agency and Health & Safety Executive (joint competent authority) to control both on and off-site risks from industries with a high potential for disaster from dangerous substances (flammable, toxic or explosive). There are no COMAH sites within the Borough.

It should be noted that all sites notified to the HSE under the Notification of Installations Handling Hazardous Substances Regulations 1982 (NIHHS sites) and COMAH sites, will be held on the hazardous substances register, so there should be no need to consult with the HSE on their location.

Explosives

Are not directly covered by the hazardous substances regulations but are controlled by the Health & Safety Executive under licences issued under the Explosives Act 1875. Any licensed sites will be identified.

Current Landfill and Waste Processing Sites

Are generally permitted by the Environment Agency under the provisions of the Environmental Permitting Regulations or Part II of the Environmental Protection Act 1990. Details of all these sites have already been provided by the Agency for this purpose.

Closed Landfill Sites

Are a potentially significant source of risk, especially those which operated before the licensing requirements of the Control of Pollution Act 1974. All closed landfills in the Borough have been identified and their association with any specified receptors considered in detail.

Sewage Works and Land used for the Disposal of Sewage Sludge

Land dedicated for the disposal of sewage sludge is notified to the Environment Agency under the Sludge (Use in Agriculture) Regulations 1989. This land, together with all operating and redundant sewage works has been identified and assessed.

Mines and Minerals Extraction

The geology of the area has resulted in large areas used for the extraction of minerals and stone. Many of the resulting quarries then being filled with refuse or other materials. These can present a particular risk to water resources. An attempt has been made to identify all past quarrying sites and assess the risk they present, although the former use of land for minerals extraction is not always obvious from historical OS maps.

Waste or Derelict Land

Often land owned by the utilities, railways or the Council is left seemingly abandoned because it has no particular use or is difficult to access. These areas can accumulate unwanted materials and can be used to dispose of wastes and effluents illegally.

Ministry Of Defence Land

Land occupied by Defence Agencies has the potential for contamination and unexploded ordinance.

Previously Developed Contaminated Sites

The inspection of the District has identified many potentially contaminated sites that have been developed over the years. In many cases which pre-date the Part IIA regime, the methods and extent of remediation is unknown, in others it may be known but the remediation suspected of being inadequate.

Potentially Contaminative Industries

The list below has been drawn up to provide a broad indication of the type of sites that are known to use, or to have used in the past, materials that could pollute the soil. It must be understood that the list is not exhaustive, also that inclusion on this list does not necessary infer the existence of a contaminant linkage.

Abattoirs
Adhesives manufacture
Agriculture
Aircraft manufacture
Airports
Animal burial
Animal by-product processing
Anodisers
Anti-corrosion treatment
Asbestos products
Asphalt works
Automotive engineering
Battery manufacture
Bearings manufacture
Blacksmiths
Boiler makers
Bookbinding
Brass and copper tube manufacture
Brass founders
Brewing
Car manufacture
Carbon products manufacture
Cement works
Chemical manufacture and storage
Chrome plating
Ceramics manufacture
Coal carbonisation
Coal merchant
Concrete batching
Coppersmiths
Descaling contractors (chemical)
Detergent manufacture
Distilleries
Dockyards
Drum cleaning
Dry cleaners
Dye works
Dyers and finishers
Electricity generation
Electrical engineers
Electro platers
Engineering works
Explosives manufacture (including fireworks)
Farms
Fertiliser manufacture
Fellmongers
Fibre glass works
Food processing
Foundries
Fuel manufacture
Fuel storage
Garages and depots
Gas mantle manufacture
Gas works
Glass works
Glue manufacture
Gum and resin manufacture
Hatters
Hide and skin processors
Ink manufacture
Iron foundry
Iron works
Lacquer manufacture
Laundries
Leather manufacture
Metal coating
Metal manufacture
Metal sprayers and finishers
Mining
Mirror manufacture
Motor vehicle manufacture
Oil fuel distributors and suppliers
Oil merchants
Oil refineries
Oil storage

Paint and varnish manufacture
Paper works
Pesticides manufacture
Petrol stations
Photographic film works
Photographic processing
Paper manufacture
Plastics works
Plating works
Power stations
Print works
Printed circuit board manufacture
Radioactive materials processing
Railway land
Railway locomotive manufacture
Refiners of nickel and antimony
Resin manufacture
Rubber manufacture
Scrap metal dealers
Sealing compound manufacture
Sewage works
Sewage sludge disposal areas
Sheet metal merchants and works
Ship breakers
Ship builders
Skein silk dyers
Small arms manufacture
Smokeless fuel manufacture
Soap manufacture
Solvent manufacture
Solvent recovery
Steel manufacture
Stove enamellers
Synthetic fibre manufacture
Tank cleaning
Tanneries
Tar and pitch distillers
Textile manufacture
Thermometer makers
Timber treatment
Timber preservatives manufacture
Tin plate works
Transport depots
Tyre manufacture and retreading
Vehicle manufacture
Vulcanite manufacture
Vulcanisers
Waste disposal
Waste recycling
Waste treatment
Zinc works

Potentially Sensitive Receptors

RECEPTOR	LAND USE TYPE
Human beings	• Allotments • Residential with gardens • Residential without gardens • Schools and Nurseries • Recreational/parks, playing fields, open space. • Commercial/industrial
Eco systems	• European Sites Special Areas of Conservation (including candidate SAC's) classified pursuant to Article 4 of European Council Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora, and Special Protection Areas (including potential SPA's) classified pursuant to Article 4 of European Council Directive on the Conservation of Wild Birds. • Ramsar Sites Listed under the Convention on Wetlands of International Importance. • Sites of Special Scientific Interest (SSSI's) Notified under section 28 of the Wildlife and Countryside Act 1981 (as amended) • National Nature Reserves (NNR's) Declared under section 19 of the National Parks and Access to the Countryside Act 1949 or section 35 of the Wildlife and Countryside Act 1981 (as amended). • Areas for the Special Protection of Birds Established under section 3 of the Wildlife and Countryside Act 1981 (as amended). • Local Nature Reserves (LNR's) Declared under section 21 of the National Parks and Access to the Countryside Act 1949. • Sites of Importance for Nature Conservation (SINC's) Afforded planning policy protection under Broxtowe Borough Local Plan.
Property	• Buildings (including below ground) • Ancient monuments • Listed Buildings, historic parks and gardens

	• Conservation areas • All crops including timber • Produce grown domestically or on allotments for consumption • Livestock • Other owned or domesticated animals • Wild game subject to shooting or fishing rights
Water	• Territorial sea water (to three miles) • Coastal waters • Inland fresh waters (rivers, streams, lakes, including the bottom / bed if dry) • Ground waters, Source Protection Zones, Major Aquifers, Water Abstraction Points • Water Resources Act 1991 s104

Statutory Guidance TABLE 1: Ecological systems effects

Relevant types of receptor	Significant harm	Significant possibility of significant harm
Any ecological system, or living organism forming part of such a system, within a location which is: • a site of special scientific interest (under section 28 of the Wildlife and Countryside Act 1981) • a national nature reserve (under s.35 of the 1981 Act) • a marine nature reserve (under s.36 of the 1981 Act) • an area of special protection for birds (under s.3 of the 1981 Act) • a "European site" within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2010 • any habitat or site afforded policy protection under paragraph 6 of Planning Policy Statement (PPS 9) on nature conservation (i.e. candidate Special Areas of Conservation, potential Special Protection Areas and listed Ramsar sites); or • any nature reserve established under section 21 of the National Parks and Access to the Countryside Act 1949.	The following types of harm should be considered to be significant harm: • harm which results in an irreversible adverse change, or in some other substantial adverse change, in the functioning of the ecological system within any substantial part of that location; or • harm which significantly affects any species of special interest within that location and which endangers the long-term maintenance of the population of that species at that location. In the case of European sites, harm should also be considered to be significant harm if it endangers the favourable conservation status of natural habitats at such locations or species typically found there. In deciding what constitutes such harm, the local authority should have regard to the advice of Natural England and to the requirements of the Conservation of Habitats and Species Regulations 2010.	Conditions would exist for considering that a significant possibility of significant harm exists to a relevant ecological receptor where the local authority considers that: • significant harm of that description is more likely than not to result from the contaminant linkage in question; or • there is a reasonable possibility of significant harm of that description being caused, and if that harm were to occur, it would result in such a degree of damage to features of special interest at the location in question that they would be beyond any practicable possibility of restoration. Any assessment made for these purposes should take into account relevant information for that type of contaminant linkage, particularly in relation to the ecotoxicological effects of the contaminant.

Statutory Guidance TABLE 2 – Property effects

Relevant types of receptor	Significant harm	Significant possibility of significant harm
Property in the form of: • crops, including timber; • produce grown domestically, or on allotments, for consumption; • livestock; • other owned or domesticated animals; • wild animals which are the subject of shooting or fishing rights.	For crops, a substantial diminution in yield or other substantial loss in their value resulting from death, disease or other physical damage. For domestic pets, death, serious disease or serious physical damage. For other property in this category, a substantial loss in its value resulting from death, disease or other serious physical damage. The local authority should regard a substantial loss in value as occurring only when a substantial proportion of the animals or crops are dead or otherwise no longer fit for their intended purpose. Food should be regarded as being no longer fit for purpose when it fails to comply with the provisions of the Food Safety Act 1990. Where a diminution in yield or loss in value is caused by a contaminant linkage, a 20% diminution or loss should be regarded as a benchmark for what constitutes a substantial diminution or loss. In this Chapter, this description of significant harm is referred to as an "animal or crop effect".	Conditions would exist for considering that a significant possibility of significant harm exists to the relevant types of receptor where the local authority considers that significant harm is more likely than not to result from the contaminant linkage in question, taking into account relevant information for that type of contaminant linkage, particularly in relation to the ecotoxicological effects of the contaminant.
Property in the form of buildings. For this purpose, "building" means any structure or erection, and any part of a building including any part below ground level, but does not include plant or machinery comprised in a building, or buried services such as sewers, water pipes or electricity cables.	Structural failure, substantial damage or substantial interference with any right of occupation. The local authority should regard substantial damage or substantial interference as occurring when any part of the building ceases to be capable of being used for the purpose for which it is or was intended. In the case of a scheduled Ancient Monument, substantial damage should also be regarded as occurring when the damage significantly impairs the historic, architectural, traditional, artistic or archaeological interest by reason of which the monument was scheduled. In this Chapter, this description of significant harm is referred to as a "building effect".	Conditions would exist for considering that a significant possibility of significant harm exists to the relevant types of receptor where the local authority considers that significant harm is more likely than not to result from the contaminant linkage in question during the expected economic life of the building (or in the case of a scheduled Ancient Monument the foreseeable future), taking into account relevant information for that type of contaminant linkage.

Technical Appendix C

Strategic Inspection

Stage 4

Prioritisation of sites for detailed inspection

Information Evaluation

Risk Screening Exercise

The Council has decided that any potentially contaminated land shall, prior to detailed investigation, be listed and categorised using a risk screening methodology; computer software, in conjunction with the GIS. The software utilises the available data regarding:

- potential source, scale, nature and toxicity of contaminant sources (from historical mapping and local knowledge)
- potential pathways (from environmental, hydrologic and geologic/hydrogeologic data sources)
- potential nature and behaviour of receptors (from land use and features mapping sources)

The software determines individual scores for the potential source and for the various pathway/receptor linkages.

Broxtowe Borough Council has utilised the GeoEnviron 8 software system to undertake the strategic risk assessment of all sites of interest within the Borough.

GeoEnviron 8 is an environmental data management system dedicated to managing data gathered from routine inspections, complaint investigations and monitoring activities. GeoEnviron 8 will be subject to a system review in 2025 to determine whether it will continue to be used, or a replacement system/process will be procured and implemented.

During the data gathering phase, key information about each site of interest was obtained from the data sources described in Technical Appendix B. This key information consisted of a characterisation of the former and current industrial uses at each site and a summary of all the potential receptors on or near to the site of interest.

Stage 1 prioritisation is based on the type of industrial uses the sites have been subject to as well as the sensitivities of the various receptors. The GeoEnviron database contains information on all the industry profiles published by the DoE to support the Part IIA regime. Each of these profiles has been hazard ranked in relation to its impact on land use (humans, ecology, buildings, etc), ground and surface water receptors. An objective methodology (which is not detailed here) has been used to obtain the scores.

The range of possible industrial hazard scores that can be assigned to a profile is defined in the software with the scoring range is from 1 (low) to 6 (very high).

Using the objective methodology mentioned above, 95 different industry profiles are assigned an industrial risk score.

The Stage 1 prioritisation continues with assigning sensitivity scores to the range of current uses, source protection zones and ground and surface water receptors being considered.

First the sensitivity scoring range for the receptors is defined. This ranges from the highest level of sensitivity scored 9 (very high – human health) to the lowest level of sensitivity scored 0.

41 different 'current land' use classifications are used to categorise all sites of interest. Each of these current land use classifications are allocated a receptor sensitivity score.

Following this, historical industrial site use (ISU) information is entered into the risk matrix. Each site of interest has been classified as falling within one of 95 different classifications of industrial use. The software contains default classifications based on the DoE industry profiles; however, a handful of additional profiles have been created where former land uses did not fall within any of the default industry profiles. More than one industry profile can be allocated to individual sites of interest.

Once the relevant information has been entered for the site, the site risk scores (SRS) are automatically calculated using the equation:

SRS = IRS × RSS

Where SRS is the Site Risk Score, IRS is the Industrial Risk Score and RSS is the Receptor Sensitivity Score.

Separate Site Risk Scores are calculated for four different receptor types, namely:

- Human Health
- Groundwater
- Ecology / Property
- Surface Water

The maximum site risk score for land use related receptors (i.e. human health and ecology / property) is 30. The maximum for ground and surface water receptors is 25.

The overall risk score for each site of interest is a sum of each of the four Site Risk Scores. Therefore, the maximum possible score for a single site is 30 + 30 + 25 + 25 = 110.

The BBC risk assessment matrix also includes an "Other Factors" component of the Stage 1 Risk assessment which allows officers to define any range of factors that also need to be taken into account as part of the risk assessment. Such factors could for example be favourable (i.e. where there is information suggesting that the site was remediated satisfactorily) or aggravating (i.e. where there is sample data confirming that the site is contaminated).

The initial risk screening process identified 1,553 sites of interest. All of these sites of interest have been processed through the risk assessment model, with output risk scores being in the range 4 (lowest score) to 79 (highest score). The distribution of the risk assessment scores for the sites of interest is summarised as follows:

Risk Score Range	Number of Sites within the Risk Score Range
80 - 110	0
71 – 79	6
61 – 70	45
51 – 60	107
41 – 50	182
31 – 40	292
21 – 30	434
11 – 20	427
0 – 10	60

Technical Appendix D

Detailed Inspection

Stage 5

Detailed Inspection of Sites

Arrangements for carrying out Detailed Inspections

The process of Detailed Inspection of a given site is to confirm that the contaminant linkage(s) identified is/are:

- resulting in significant harm (or the significant possibility of such harm) being caused to the receptor(s), or
- harm (where attributable to radioactivity)

If either of these is confirmed then the land becomes contaminated land by definition and the contaminant linkage becomes, 'significant'.

The detailed inspection of contaminated land is invariably a very time consuming and expensive process; therefore, it must be emphasised that all investigations will be carried out on an incremental basis and terminated immediately it is clear that no significant contaminant linkage exists.

Land Contamination Risk Management (LCRM)

The LCRM replaced the Model Procedures for the Management of Land Contamination (CLR11) in 2020. Both have been developed to provide the technical framework for applying a risk management process when dealing with land affected by contamination.

The process involves identifying, making decisions on, and taking appropriate action to deal with land contamination in a way that is consistent with government policies and legislation within the UK.

Each tier of the risk assessment process will conclude by assessing whether any contaminant linkage(s) exists, and if so whether it is considered to be 'significant'. If it is considered that any such linkage exists then the inspection process will move onto the next phase of risk assessment ultimately reaching a proposal for remediation, if required.

See Flow Diagram pE3 [extract from CLR11]

In cases where imminent risk of serious harm or serious pollution of controlled waters has been confirmed, the Council will authorise urgent action.

Obtaining Desk Top Information (Tier 1 Preliminary Risk Assessment)

The suggestion that land may be contaminated can have a significant impact on the way others view it, and in particular, its perceived value. The Council will therefore seek to obtain as much information as possible about a potential site without causing unnecessary alarm. This may involve detailed inspection of historical data in its possession such as Planning and Building Control files.

Also, the consultation of others who may possess information such as:

- The Environment Agency
- Department of Environment, Food and Rural Affairs
- English Heritage
- Nottinghamshire County Council
- Food Standards Agency
- The Health & Safety Executive
- Developers
- Previous occupiers
- and others

Once sufficient information has been obtained which confirms a contaminant linkage does not exist, or, if it does, it is not significant, then the investigation will cease and no further action will be taken. A Written Statement (see **Technical Appendix E**) will be produced and kept on file, should a request for information be made.

It may be, however, that circumstances will be identified whereby a significant contaminant linkage could occur at some time in the future, and in this case arrangements will be made to keep the situation under review.

Inspection of Land (Quantitative Risk Assessment)

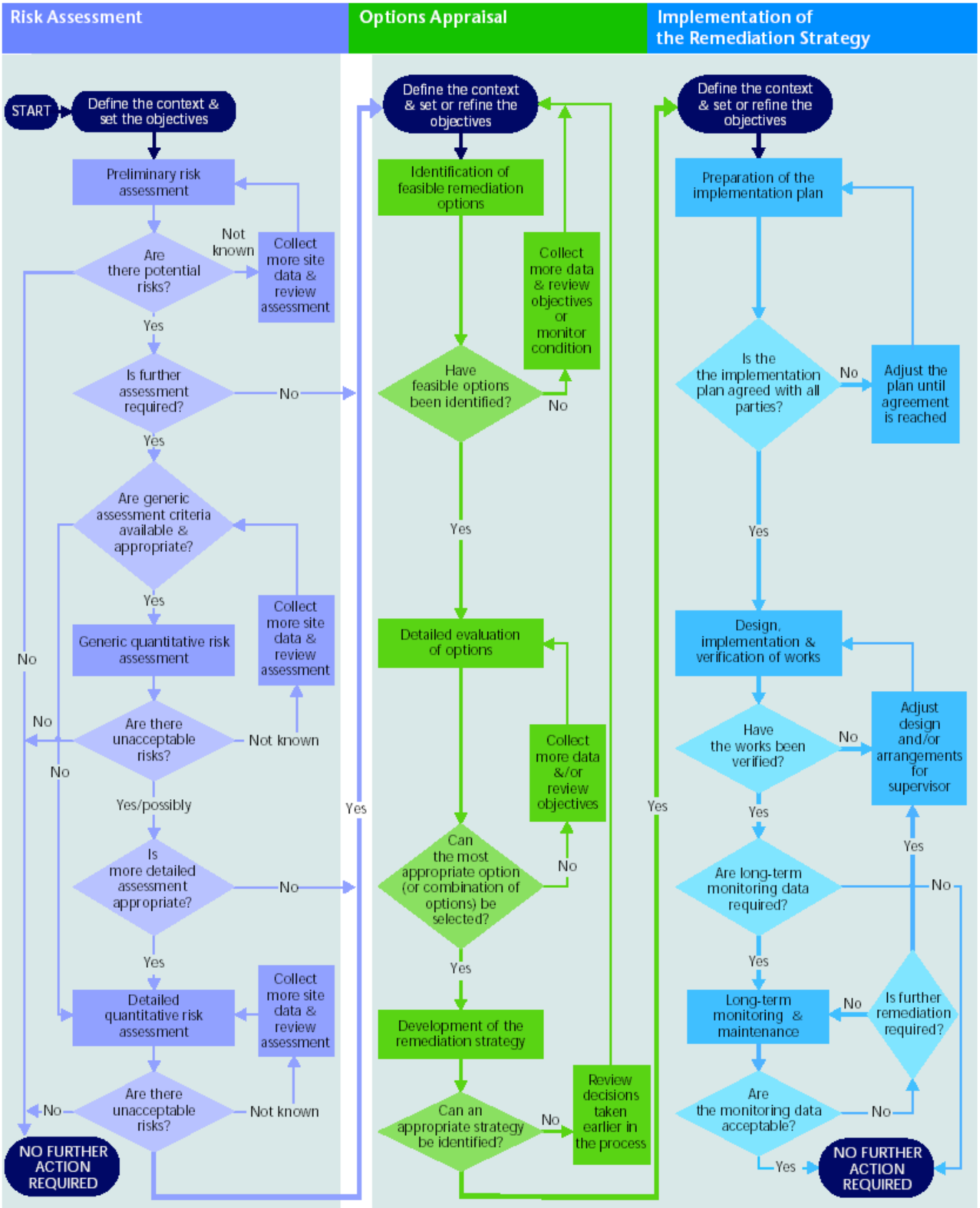
Where evaluation of all available data suggests a significant contaminant linkage may exist, it may be necessary to visit the site and carry out some form of on-site testing or take away samples for analysis.

In every case this will be carried out by a “suitable person”, adequately qualified to undertake the work. The Council may, from time to time, employ external consultants to carry out site investigation works. The appointment of external consultants will be carried out in accordance with the Councils procedures.

Intrusive investigations will be carried out in accordance with appropriate health and safety and technical guidance to ensure:

a) they are effective.
b) do not cause any unnecessary damage or harm; and
c) do not cause pollution of controlled waters.

To ensure the most appropriate technical procedures are employed the Council will have regard to the most up to date Government guidance available.



Note: The process may apply to one or more pollutant linkages each of which may follow a different route. For some linkages, it may be possible to stop at an early stage – others will progress all the way through the process. The level of complexity of each stage may also vary and in some cases may be very simple.

Source: Model Procedures for the Management of Land Contamination CLR11 superceded by LCRM

Flow Diagram showing Detailed Inspection Stages

CLEA Model and Generic Soil Screening Values

Soil Guideline Values (SGVs)

A set of generic soil guideline values (SGV's), and a risk assessment model – the Contaminated Land Exposure Assessment (CLEAUK) model has been produced by DEFRA and the Environment Agency. These SGV's have been derived using a set of generic base site information and so they should only be used for the Tier 2 risk assessment.

In practice the only SGV still used are those for dioxins and dioxin like PCBs – all the others have been superseded.

Generic Assessment Criteria (GACs)

Risk assessment may also be required for substances or scenarios for which there is no SGV's; where there is an information gap the Authority may use other available generic assessment criteria (GACs) values provided:

(i) they understand how they were derived and how they can be used appropriately,
(ii) they have been produced in an objective, scientifically robust and expert manner by reputable organisations, and
(iii) they are only used in a manner that is in accordance with Part 2A and the Statutory Guidance.

Category 4 Screening Levels (C4SLs)

As we have seen in **Technical Appendix A** (pA-7) the revised statutory guidance (2012) has introduced the concept of classification of land (Classes 1 – 4). Part of the implementation of the guidance has seen the creation of Category 4 Screening Levels (C4SLs) which will provide a higher simple test for deciding that land is suitable for use and definitely not contaminated land.

The Use of Screening Values

Whilst generic guidelines (SGV, LQM/CIEH, S4UL, CL:AIRE GAC or C4SL) can be used in the Tier 2 Generic Quantitative Risk Assessment. Exceedance of such GAC should not be used as direct indicators of whether a significant possibility of significant harm to human health may exist.

The level of risk raised by land contamination will depend on more than simply the concentrations of contaminants in the soil, i.e. the amount a screening value is exceeded by. For example, it may also depend on:

- what form the contaminants take,
- where they are in the soil,
- the efficiency of the pathway by which receptors may be exposed,
- the sensitivity of receptors,
- the likely degree and duration of exposure,
- the dose-response relationship,
- natural background levels; etc.

These factors will vary from case to case, sometimes very substantially.

To further define the risks and help remove any uncertainties, a site specific *'detailed quantitative risk assessment'* may be conducted (Tier 3 assessment). The CLEA UK model will be used as a preferred option when appropriate, however, other risk assessment models may be considered, should they be required.

Background levels

The revised statutory guidance (DEFRA 2012) introduced the concept of "normal" levels of contaminants in the soil. Normal levels of contaminants in soil should not be considered to cause land to qualify as contaminated land, unless there is a particular reason to consider otherwise. Therefore, if it is established that land is at or close to normal levels of particular contaminants, it should usually not be considered further in relation to the Part 2A regime

Normal levels of contaminants in soil are considered to result from:

(a) The natural presence of contaminants (e.g. caused by soil formation processes and underlying geology) at levels that might reasonably be considered typical in a given area and have not been shown to pose an unacceptable risk to health or the environment.

(b) The presence of contaminants caused by low level diffuse pollution and common human activity other than specific industrial processes. For example, this would include diffuse pollution caused by historic use of leaded petrol and the presence of benzo(a)pyrene from vehicle exhausts, and the spreading of domestic ash in gardens at levels that might reasonably be considered typical.

The statutory guidance gives further advice to Local Authorities on taking "normal" levels into consideration when making Part 2A decisions.

Risk Assessment for Controlled Waters

Advice will be sought from the Environment Agency on the risk assessment if controlled waters are the receptor in a particular contaminant linkage prior to determination. It is anticipated that risk assessments and remediation will be carried out in accordance with Environment Agency guidance.

Risk Communication

Communicating about land contamination and proposed remediation solutions is exceedingly complex and often emotionally charged because of the potentially serious implications of the problem, the diverse range of people involved and competing priorities.

Effective risk communication is not just about convincing people about what you perceive as the 'real' risk following a technical risk assessment but must be based on an understanding that people will have different perceptions of the risk as a result of their own situation and values.

In communicating with affected parties, the Council will ensure that the methods used: -

- are relevant to the group requesting the information.

- are clear, consistent and concise.
- are not overly technical.
- allow equal access to all information.
- officers are available for discussions, meetings, etc.
- that all relevant partners are included.
- that feedback will be invited.
- that risk-based information will be communicated objectively, and the sources of those assessments are identified.
- that the information and decision linking process is timely, transparent, objective and consistent.

Powers of Entry

Statutory powers of entry are conferred on the Council to enable it to carry out its functions under Part 2A. There are no circumstances in which the Council will use these powers to obtain information about the condition of land, where:

- It can obtain the information from third parties without the need for entering the site; or
- A person offers to provide all the information required by the Council within an agreed and a reasonable and specified time and does so.

Land which may be a Special Site

Where the Council is aware that land it intends to investigate would, if declared contaminated land, be a special site, it will notify the Environment Agency in writing requesting any information it may have on the land and the likelihood of contaminant linkages. According to the wishes of the Environment Agency, it may be that a joint investigation will be undertaken.

Where the Environment Agency (or their agents) wish to carry out formal investigation on behalf of the Council their officers will need to be appointed as, “suitable persons”. The Environment Agency do not have the power under Part 2A to investigate land which may be contaminated land without the authorisation of the Council.

Determining that land is Contaminated Land

There are six possible grounds for determining if land is contaminated:

a) Significant harm is being caused,

b) There is a significant possibility of significant harm being caused,

c) Significant pollution of controlled waters is being caused,

d) There is a significant possibility of significant pollution of controlled waters being caused,

e) Harm is being caused (in relation to radioactivity), or

f) The possibility of harm being caused is “significant” (in relation to radioactivity).

Before making any determination, the local authority should have identified one or more significant contaminant linkage(s), and based on a robust, appropriate, scientific and technical assessment of all the relevant and available evidence.

If the authority considers that conditions for considering land to be contaminated land do not exist it should not decide that the land is contaminated land.

Deciding that land is not Contaminated Land

In implementing the Part 2A regime, the Council is likely to inspect land that it then considers is not contaminated land. For example, this will be the case where the authority has ceased its inspection and assessment of land on grounds that there is little or no evidence to suggest that it is contaminated land. In such cases, the authority should issue a Written Statement to that effect (rather than coming to no formal conclusion) to minimise unwarranted blight. (See **Technical Appendix E**)

Situations may arise where, it is not possible to determine whether a pollutant linkage is significant in accordance with the statutory guidance, i.e. that the nature of soil contamination means it is never possible to know the exact contamination status of any land with absolute certainty, and that scientific understanding of risks may evolve over time.

Such a lack of certainty should not stop the Council from deciding that land is not contaminated land. The starting assumption of Part 2A is that land is not contaminated land unless there is reason to consider otherwise.

Inspection may identify contamination that would form a significant pollutant linkage should new receptors be introduced. In such circumstances this information will be carefully recorded and the site monitored where the introduction of relevant new receptors seems likely. Should such a site be identified for future development the information obtained during the investigation will be made available to the planning officer and the developer.

The Written Record of Determination and Formal Notification

Record of Determination

Once an area of land has been declared contaminated by statutory definition, the Council will prepare a written record to include:

- location, boundaries and area of the land in question (inc. OS grid ref).
- a Risk Summary (See **Technical Appendix E**)
- a summary of why the Council considers that the requirements of the Statutory Guidance have been satisfied.

The Council will then formally notify in writing all relevant parties that the land has been declared contaminated, these to include:

- the owner(s)
- the occupier(s)

- those liable for remediation ('appropriate persons' in the guidance)
- the Environment Agency

Notification

At the notification stage it may not be possible to identify all the relevant parties, particularly the appropriate persons. The Council will, however, act on the best information available to it at this time and keep the situation continually under review as more information comes to light.

Special Sites

In the case of any land which, following determination as contaminated land, would be likely to meet one or more of the descriptions of a "Special Site" set out in the Contaminated Land Regulations 2006, the Council should consult the Environment Agency before deciding whether or not to determine the land, providing the Agency with a draft record of the determination.

The Council should take the Agency's views into full consideration, and it should strive to ensure it has the Agency's agreement to its decision (although the decision is for the Council to make subject to the provisions of Part 2A).

Voluntary Remediation

The legislation and statutory guidance have been designed to try to encourage *voluntary remediation* (without the need for enforcement action). The formal notification procedure commences the process of consultation on what remediation might be most appropriate. To aid this process the Council will therefore provide as much information to the relevant parties as possible:

- a copy of the written record of determination.
- copies of site investigation reports (or details of their availability)
- an explanation of why the appropriate persons have been chosen
- details of all other parties notified

The appropriate persons will also be provided with written explanations of the test for exclusion and apportionment.

It may be at this stage that the Council will need further information on the condition of the site to identify whether any additional significant contaminant linkages exist. If that is the case an informal attempt will be made to obtain this information from the appropriate persons already identified.

Remediation of Contaminated Land

Once land has been determined as contaminated land, the enforcing authority must consider how it should be remediated and, where appropriate, it must issue a remediation notice to require such remediation.

The enforcing authority for the purposes of remediation may be the local authority which determined the land, or the Environment Agency, which takes on responsibility once land has been determined if the land is deemed to be a “special site”. The rules on what land is to be regarded as special sites, and various rules on the issuing of remediation notices, are set out in the Contaminated Land (England) Regulations 2006.

The broad aim of remediation should be:

(a) to remove identified significant contaminant linkages, or permanently to disrupt them to ensure they are no longer significant and that risks are reduced to below an unacceptable level; and/or
(b) to take reasonable measures to remedy harm or pollution that has been caused by a significant contaminant linkage.

In cases where the aim of remediation is to remove or permanently disrupt significant contaminant linkages, remediation treatment should involve demonstrable disruption or removal of the significant contaminant linkage(s) that led to land being determined as contaminated land, in order to reduce or remove unacceptable risks to receptors.

This might involve one or more of the following:

(a) Reducing or treating the contaminant part of the linkage
(b) Breaking, removing or disrupting the pathway parts of the linkage.
(c) Protecting or removing the receptor.

Technical Appendix E

Detailed Inspection

Stage 5

Determining Liabilities and Information Management

Liability & Enforcement

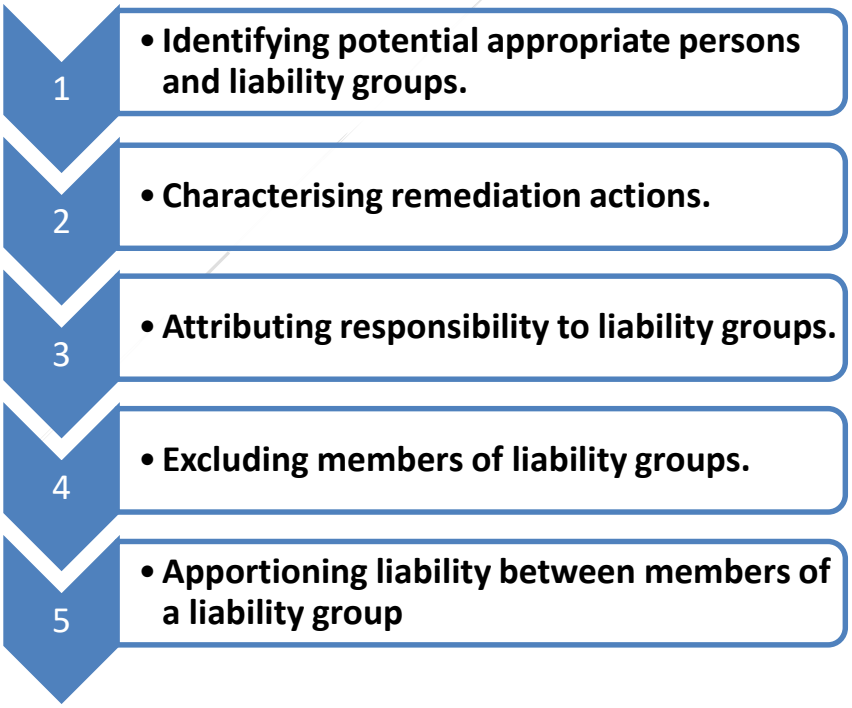
For some land, the process of determining liabilities will consist simply of identifying either a single person (either an individual or a corporation such as a limited company) who has caused or knowingly permitted the presence of a single significant contaminant, or the owner of the land. The history of other land may be more complex.

A succession of different occupiers or of different industries, or a variety of substances may all have contributed to the problems which have made the land "contaminated land" as defined for the purposes of Part 2A. Numerous separate remediation actions may be required, which may not correlate neatly with those who are to bear responsibility for the costs.

The degree of responsibility for the state of the land may vary widely. Determining liability for the costs of each remediation action can be correspondingly complex. The main provisions for the establishment of liability are set out in Part 2A legislation itself and the 1990 Act should always be the primary reference.

The Five Step Procedure

The procedure for determining liabilities has five distinct steps as follows:



Liability Groups

The process commences with the establishment of liability groups. All appropriate persons for any one contaminant linkage are a 'liability group'.

These may be class 'A' or class 'B' persons.

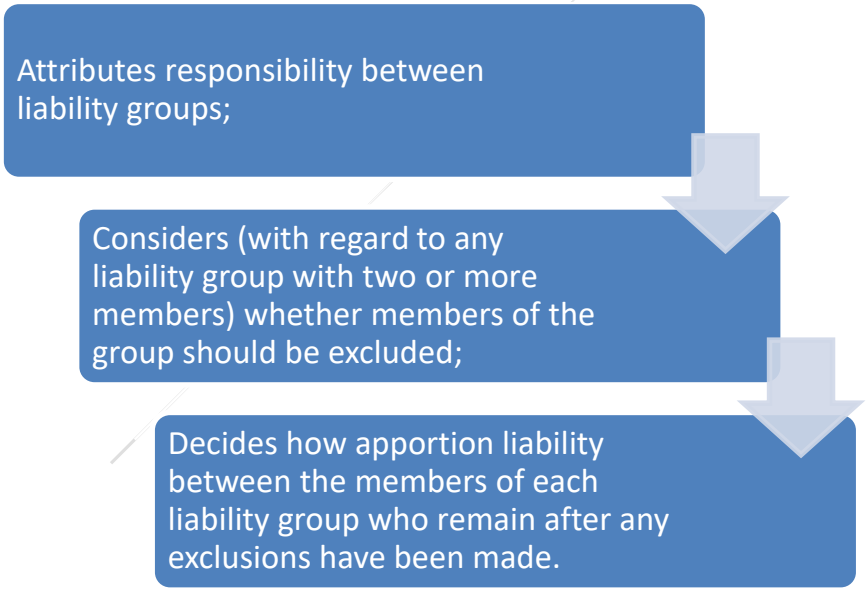
> **APPROPRIATE PERSONS - Class 'A'** - These are, generally speaking the polluters, but also included are persons who, "knowingly permit". This includes developers who leave contamination on a site which subsequently results in the land being declared contaminated.
>
> **APPROPRIATE PERSONS - Class 'B'** - Where no class 'A' persons can be found liability reverts to the owner or the occupier. These are known as class 'B' persons.

The Council will make all reasonable enquiries to identify Class 'A' persons before liability reverts to Class 'B' owners or occupiers.

The matter of appropriate persons must be considered for each significant contaminant linkage. Therefore, where a site has had a series of contaminative uses over the years, each significant contaminant linkage will be identified separately and liability considered for each.

Attribution and Apportionment of Liabilities

The Council must then follow a process found in the 1990 Act and supplemented by the Statutory Guidance, whereby the Council:



Reference is made back to the 1990 Act and Statutory Guidance for further details of Attribution, Exclusion tests and Apportionment of liabilities.

The Enforcement Process

Before remediation notices are served the extensive consultation process will be completed and ample encouragement given to arrive at an informal solution. The

Council will do all in its power to consult the appropriate person(s), owners, occupiers etc about their views on the state of the land.

Remediation notices are served only as a last resort (not withstanding urgent cases), and then only after this lengthy consultation process has been exhausted. Notices will be authorised after two tests are satisfied:

- that the remediation actions will not be carried out otherwise.
- that the Council has no power to carry out the work itself.

If these are met the Council will serve a remediation notice on each appropriate person. These cannot be served less than three months after formal notification that the land is contaminated unless the urgent action is deemed necessary (where there is imminent risk of serious harm).

Information Management

General Principles

A large amount of information, in the form of reports, maps, letters and documents will be required to enable the Council to undertake its inspection duties. This data will come from a variety of sources and many different formats. The management of data concerning the environment is covered under The Environmental Information Regulations 2004, whilst Part 2A of the Environmental Protection Act1990 covers the information required for the register of contaminated land. The revision to the Statutory Guidance introduces the Written Statement and Risk Summary.

Detailed Inspection Outputs

Written Statements

Where detailed inspection ceases, on the grounds that there is little or no evidence to suggest that the land would be contaminated land, the Council will issue a Written Statement detailing its decision.

The statement should make clear that on the basis of its assessment, the authority has concluded that the land does not meet the definition of contaminated land under Part 2A. The authority may choose to qualify its statement (e.g. given that its Part 2A risk assessment may only be relevant to the current use of the land, or based on the information held at the time).

The Written Statement will be issued to all effected parties where the Council has carried out a Phase II assessment; as part of the ongoing communications strategy for the project. Where the Council has ceased investigations at the Phase I stage (desk-top study), and no communication with landowners has occurred, the Written Statement will be put on the project file and used in response to any requests for information.

Risk Summaries

The Council should produce a risk summary for any land where, on the basis of its risk assessment, the authority considers it is likely that the land in question may be determined as contaminated land.

The risk summary should explain the Council's understanding of the risks and other factors the authority considers to be relevant. The Council should seek to ensure that the risk summary is understandable to the layperson, including the owners of the land and members of the public who may be affected by the decision. The Risk Summary forms the major part of the Record of Determination (See **Technical Appendix D**).

Risk summaries should as a minimum include:

(a) A summary of the authority's understanding of the risks, including a description of:
    i. the contaminants involved.
    ii. the identified contaminant linkage(s) (Conceptual Site Model).
    iii. the potential impact(s).
    iv. the estimated possibility that the impact(s) may occur; and
    v. the timescale over which the risk may become manifest.

(b) A description of the Council's understanding of the uncertainties behind its assessment.

(c) A description of the risks in context, for example by setting the risk in local or national context, or describing the risk from land contamination relative to other risks that receptors might be expected to be exposed to in any case.

This need not involve a detailed comparison of relative risks, but the Council should aim to explain the risks in a way which is understandable and relevant to the layperson.

(d) A description of the authority's initial views on possible remediation. This need not be a detailed appraisal, but it should include:
    i. a description of broadly what remediation might entail.
    ii. how long it might take.
    iii. likely effects of remediation works on local people and businesses.
    iv. how much difference it might be expected to make to the risks posed by the land; and
    v. the authority's initial assessment of whether remediation would be likely to produce a net benefit.

In the case of land which would be likely to be a special site, the Council should seek the views of the Environment Agency, and take any views provided into account in producing this description.

Local authorities are not required to produce risk summaries:

(a) For land which will not be determined as contaminated land following Detailed Inspection (e.g. land that would be in Categories 3 and 4). In such cases the authority should produce a Written Statement.
(b) For land which has been prioritised for detailed inspection (See **Technical Appendix B**), but which has not yet been subject to risk assessment (See **Technical Appendix D**).
(c) For land determined as contaminated land before the 2012 revision of the Statutory Guidance came into force.

The Public Register

The public register will be located in: -

Public Protection Service,
Broxtowe Borough Council,
Foster Avenue,
Beeston,
Nottingham,
NG9 1AB

It will be available for inspection within normal office hours Monday to Friday.

The public register is intended to act as a full and permanent record, open for public inspection, of all regulatory action taken by the Council in respect of the remediation of contaminated land, and will include information about the condition of that land.

The register maintained by the Council will contain full particulars of the following matters, in a readily accessible paper format. All information is to be added to the register as soon as it is reasonably practical to do so: -

- Remediation notices served
- Appeals against remediation notices
- Remediation declarations
- Remediation statements
- Appeals against charging notices
- Designation of special sites
- Notification of claimed remediation
- Convictions for failure to comply with a remediation notice.
- Guidance issued by Environment Agency concerning contaminated land
- Other environmental controls

- Information on Contaminated Land that the Council is responsible for.

Confidentiality of Register Information

Issues relating to information being excluded from the public register on the grounds of:

(a) National Security; or
(b) Commercial Confidentiality

will be considered in detail by the Council's Solicitor and Data Protection Administrator.

Contaminated Land Strategy – Change Table

Appendix 2

Policy Section	Suggested Change	Reason for Change
Executive Summary	New paragraphs	To reflect updates in strategy and changes in context.
Whole Document	Updated	Update to reflect changes since last strategy.
Whole document	Reorganisation of Sections and associated renumbering	Technical references moved to appendices for easier future update.
1.1.3	Updated reference to corporate priorities	Corporate plan updated in 2024
4. Development Control and Part 2A	Addition of Figures 1 - 3	Quantitative data added including Number of Planning Application consultations reviewed, outputs of Part 2A work carried out etc.
5	Addition of Action Plan	To summarise key actions

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Cabinet **29 July 2025**

Report of the Portfolio Holder for Environment and Climate Change

Annual Air Quality Status Report 2025

1. Purpose of Report

To advise Members of the latest Air Quality Status Report which has been submitted to the Department of Food Environment and Rural Affairs (DEFRA). This is in accordance with the Council's Corporate Priority of Environment – protect the environment for the future and Community Safety – a safe place for everyone.

2. Recommendation

Cabinet is asked to RESOLVE that the Air Quality Status Report 2024 and the Updated Action Plan, be approved.

3. Detail

Each year, DEFRA requires all local authorities in England to produce an Annual Status Report (ASR) in respect of air quality for the preceding calendar year. The production of an ASR is intended to aid local transparency, increase accessibility of air quality to the wider public audience and encourage buy-in to delivering air quality improvement measures by those best placed to assist (e.g. Directors of Public Health, transport managers etc.). The format of the report is specified by DEFRA and there is a submission date of 30 June each year.

The annual bias corrections used in the report are not usually available until at least the end of April each year, and the required information from Nottinghamshire County Council is not available until June, which can create challenges in the timing and the submission if the ASR to DEFRA and bringing the ASR to cabinet.

Once submitted, the ASR is appraised by technical experts appointed by DEFRA and an Appraisal Report is issued which either accepts or rejects the ASR and provides additional audit observations. The report as attached has been submitted to DEFRA and is currently awaiting appraisal feedback.

The Air Quality Action Plan relevant to Broxtowe's direct actions is now included into the Air Quality project strand of the Climate Change and Green Futures Action Plan and updated there accordingly. Broxtowe's ASRs are approved by the Portfolio Holder for Environment and Climate Change and the Director of Public Health before submission. Cabinet will be advised of the feedback received from DEFRA later in the year. The feedback from the 2024 Broxtowe ASR was that it was an example of good practice.

The key findings of the 2025 ASR are that:

- The 2024 nitrogen dioxide results show that the air quality levels are below the objective of 40µg/m^3 for all of the monitoring locations throughout the Borough being monitored by 41 diffusion tubes.
- The Council's diffusion tube network across the Borough has consistently shown that the air quality levels are below the objective and are clearly showing a downward trend.
- In many locations the air quality in 2024 was better than the measured air quality in 2020 – a year when traffic emissions were significantly reduced due to Covid19 restrictions on movement.
- The real time air quality sensor, which monitors $PM_{2.5}$, PM_{10} and NO_2 in the Trowell AQMA has provided BBC with results that show measured air quality meets the statutory objectives for each of these airborne pollutants.

The ASR outlines all of the actions that the Council and other stakeholders have completed or are taking forward in pursuit of improving air quality. The ASR summarises a hundred and ten (110) actions, each of which contribute to better air quality. They have all therefore helped deliver the observed improvements in air quality and should contribute to the continuation of improved air quality.

The ASR will be published on the Council's website. As a public facing document, it also contains a summary of the ways in which members of the public can take their own action to help improve air quality.

The actions contained in the ASR also link strategically with county and regional action to improve air quality contained in the Air Quality Strategy for Nottingham and Nottinghamshire 2020-2030.

Some of the key actions delivered or completed during 2024 were:

- Approval and initial implementation of the Councils Electric Vehicle Infrastructure Strategy (EVI).
- Replacement of Council refuse collection HGVs with newer, lower emission HVO vehicles.
- Approval of a new Smoke Control Order covering all of Broxtowe which will take effect in mid-2025.
- Commissioning of new cremators at the Bramcote Crematorium.
- Completion of cycling infrastructure improvements in Stapleford supported through the Stapleford Towns Fund.

The key actions for future delivery are:

- Implementation of the Electric Vehicle Infrastructure Strategy (EVI).
- Implementation of the Broxtowe Smoke Control Order.
- Continued reduction of emissions from the Councils own transport fleet.
- Revision of the Air Quality Strategy for Nottingham and Nottinghamshire 2020-2030.
- Delivery of low carbon homes capital projects.

Further measures to improve air quality have been devised in this reporting year for which will be implemented in 2025/26.

4. Key Decision

This is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as it affects more than two Wards within the Borough.

5. Updates from Scrutiny

Not applicable.

6. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

There are no additional financial implications, with operational costs being contained within existing budgets. There could be additional costs for the Council if real time air monitoring continues and/or action was taken to expand or increase monitoring. Any significant budget implications going forward, over and above virement limits, would require approval by Cabinet.

7. Legal Implications

The comments from the Monitoring Officer / Head of Legal Services were as follows:

Part IV of the Environment Act 1995 sets out statutory provisions on air quality. Section 82 provides that Councils shall review the air quality within their area. Section 83 requires Councils to designate Air Quality Management Areas (AQMAs) where air quality objectives are not being achieved, or are not likely to be achieved (i.e. where pollution levels exceed the air quality objectives) as set Cabinet 25 July 2023 out in the Air Quality (England) Regulations 2000. Where an area has been designated as an AQMA, Section 84 requires councils to develop an Air Quality Action Plan (AQAP) setting out the remedial measures required to achieve the air quality standards for the area covered within the AQMA. The Department for Environment, Food and Rural Affairs (DEFRA) has provided statutory guidance in the form of the Local Air Quality Management Policy Guidance. The guidance gives particular focus to so-called ‘priority

pollutants' such as Nitrogen Dioxide (NO2) and so-called 'Particulate Matter' (PM10 and PM2.5) which are relevant to district councils. Councils are required to submit an Annual Status Report (ASR) to DEFRA in order to report the progress being made in achieving reductions in concentrations of emissions relating to relevant pollutants below air quality objective levels. The completed report is submitted to the Secretary of State (DEFRA) for consideration.

8. Human Resources Implications

There were no comments from the Human Resources Manager.

9. Union Comments

There were no comments from the Union.

10. Climate Change Implications

The actions outlined in the air quality status report, support and reinforce the programme of activities identified in the Climate Change and Green Futures Strategy and delivery programme. These actions have already contributed to favourable environmental outcomes, such as the improvement of air quality, the reduction of carbon emissions and a contribution towards mitigating the worst impacts of climate change. Moreover, future actions resulting from Local Air Quality Management in the Borough will continue to deliver beneficial results in the future.

11. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

As there is no change to policy an equality impact assessment is not required.

13. Background Papers

Nil.

Broxtowe Borough COUNCIL

Appendix 1

2025 Air Quality Annual Status Report (ASR) for Broxtowe Borough Council

In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management

June 2025

Information	Broxtowe Borough Council Details
Local Authority Officer	Environmental Health Officer (Environmental Protection)
Service Area	Environmental Health
Address	Council Offices Foster Avenue, Beeston, Nottingham NG9 1AB
Telephone	0115 9177777
E-mail	health@broxtowe.gov.uk
Report Reference Number	BBC/AQ/ASR/2025
Date	June 2025

Local Responsibilities and Commitment

This ASR was prepared by Environmental Health Services of Broxtowe Borough Council with the support and agreement of the following Officers and departments:

- Head of Environmental Health, Licensing and Private Sector Housing Services.
- Environmental Health Technical Officer - Public Protection.
- Senior Environmental Health Officer Public Protection.
- Planning Policy Team Leader - Planning and Economic Development Services.
- Parking Manager - Corporate Services.
- Licensing Manager - Environmental Health, Licensing and Private Sector Housing Services.
- Human Resources Manager – Chief Executive's Department.
- Capital Works Manager - Asset Management and Development Services.
- Assistant Director of Environment Services.
- Payroll and Job Evaluation Manager – Executive Director's Department.
- Transport and Stores Manager – Environment Services.
- Assistant Director of Asset Management and Development Services.
- Environmental Development Officer - Parks and Open Spaces Team Environment Services
- Project Manager – Asset Management and Development Department Services.
- Climate Change Manager – Environment Services.

- Head of Economic Development and Regeneration.
- Kimberley Means Business Manager - Economic Development and Regeneration Services.
- Regeneration Projects Manager - Economic Development and Regeneration Services.
- Team Manager – Nottinghamshire County Council Local Transport Plans and Programme Development Place Department.
- Senior Local Transport Plan Officer - Nottinghamshire County Council Local Transport Plans and Programme Development Place Department.
- Public Health and Commissioning Manager, Public Health, Nottinghamshire County Council.
- Councillor Helen E Skinner, Portfolio Holder for Environment and Climate Change, Broxtowe Borough Council.

This ASR has been approved by:

Councillor Helen E Skinner, Portfolio Holder for Environment and Climate Change, Broxtowe Borough Council.	

This ASR has been signed off on behalf of the Director of Public Health by:

Jo Marshall, Public Health and Commissioning Manager, Public Health, Nottinghamshire County Council	 Nottinghamshire County Council

If you have any comments on this ASR, please send them to

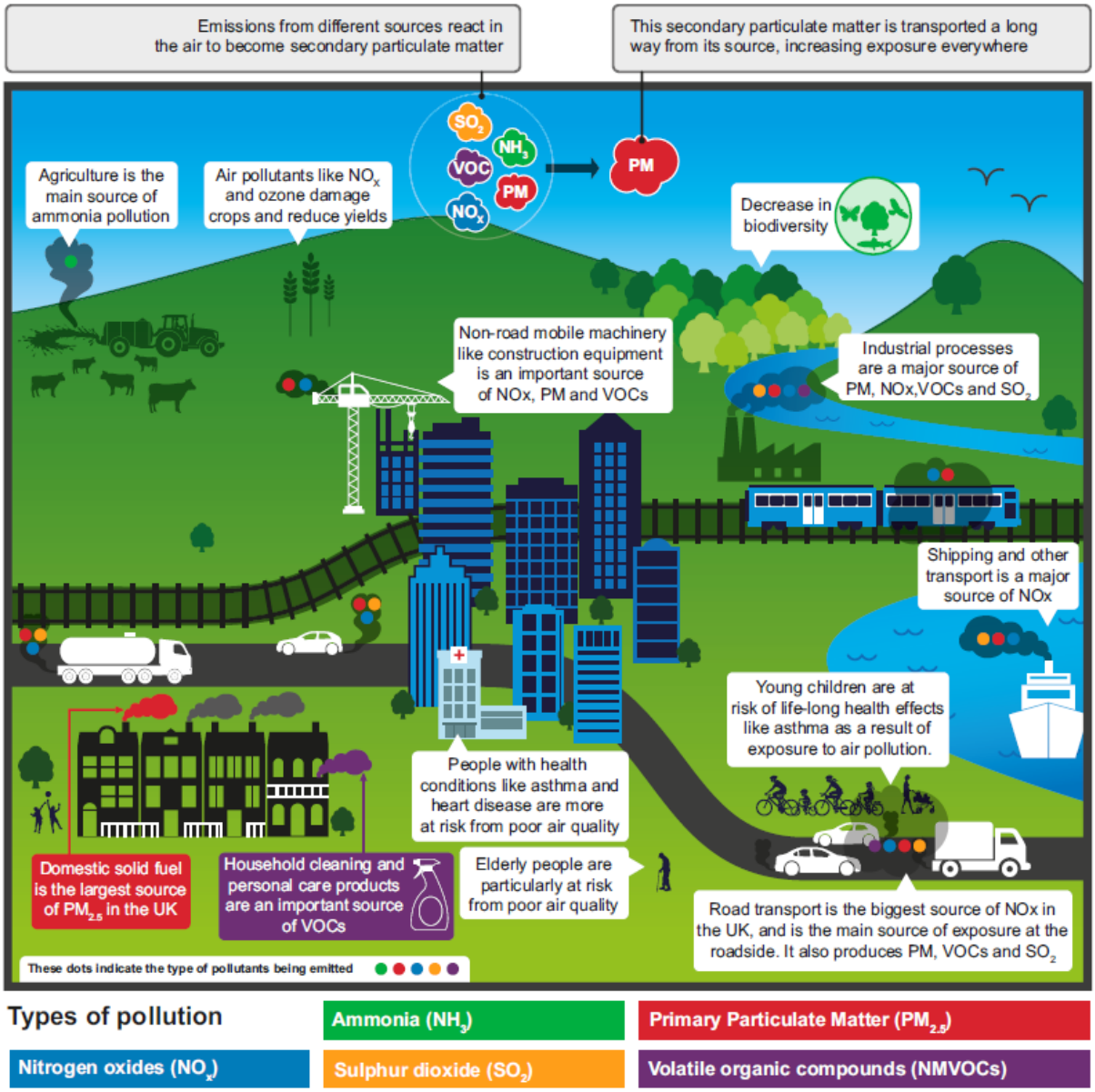
Broxtowe Borough Council,
Council Offices,
Foster Avenue, Beeston,
Nottingham,
NG9 1AB.
Telephone: 0115 917 7777

Email at: health@broxtowe.gov.uk

Executive Summary: Air Quality in Our Area

What is Air Pollution and where does it come from?

Air pollution is generally defined as any type of particulate (dust) or gaseous substance (e.g. Oxides of Nitrogen) that is emitted into the atmosphere due to the combustion of fuels such as coal, oil, gas, petrol, diesel and the burning of wood or natural gas from domestic central heating boilers or power stations. When these fuels are combusted, they are emitted into the atmosphere, and they affect the air quality within the United Kingdom (UK).



Source – Clean Air Strategy 2019, DEFRA Clean Air Strategy

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 $PM_{2.5}$)	Particulate matter is everything in the air that is not a gas. 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. PM_{10} refers to particles under 10 micrometres. Fine particulate matter or $PM_{2.5}$ are particles under 2.5 micrometres.

Poor air quality can affect people's health on a daily basis and can result in premature death. Therefore, it is imperative that poor air quality is recognised as a public health issue and that continual measures are taken to improve the air quality even if the air quality objectives in the UK are being met.

The two main types of air pollution within the United Kingdom are Nitrogen Dioxide (NO_2) and Particulate Matter (PM_{10} and $PM_{2.5}$). Therefore, this report will explain the effects of these pollutants on health, the concentration levels within the Borough of Broxtowe and measures that have been, are being and will be taken to improve the air quality within the Borough.

What is Nitrogen Dioxide?

Nitrogen Dioxide is a reddish-brown gas with the chemical formula NO_2. Nitrogen Monoxide is a colourless gas with the chemical formula NO. Collectively NO_2 and NO are known as Oxides of Nitrogen and the chemical formula is NOx.

As mentioned previously NOx is emitted into the atmosphere due to the combustion of fuels such as coal, oil, gas, petrol, diesel and the burning of wood or as natural gas from domestic central heating boilers or power stations.

Some sources of NOx release NOx in the form of NO_2 into the atmosphere, these are known as primary sources of NO_2, which are mainly emitted from vehicle exhausts.

Another source of NO_2 in the atmosphere is due to a chemical reaction in the atmosphere between NO and Ozone (O_3). This is classed as a secondary source of NO_2. However, if concentrations of O_3 are low near to the source of NO then NO_2 will not be formed.

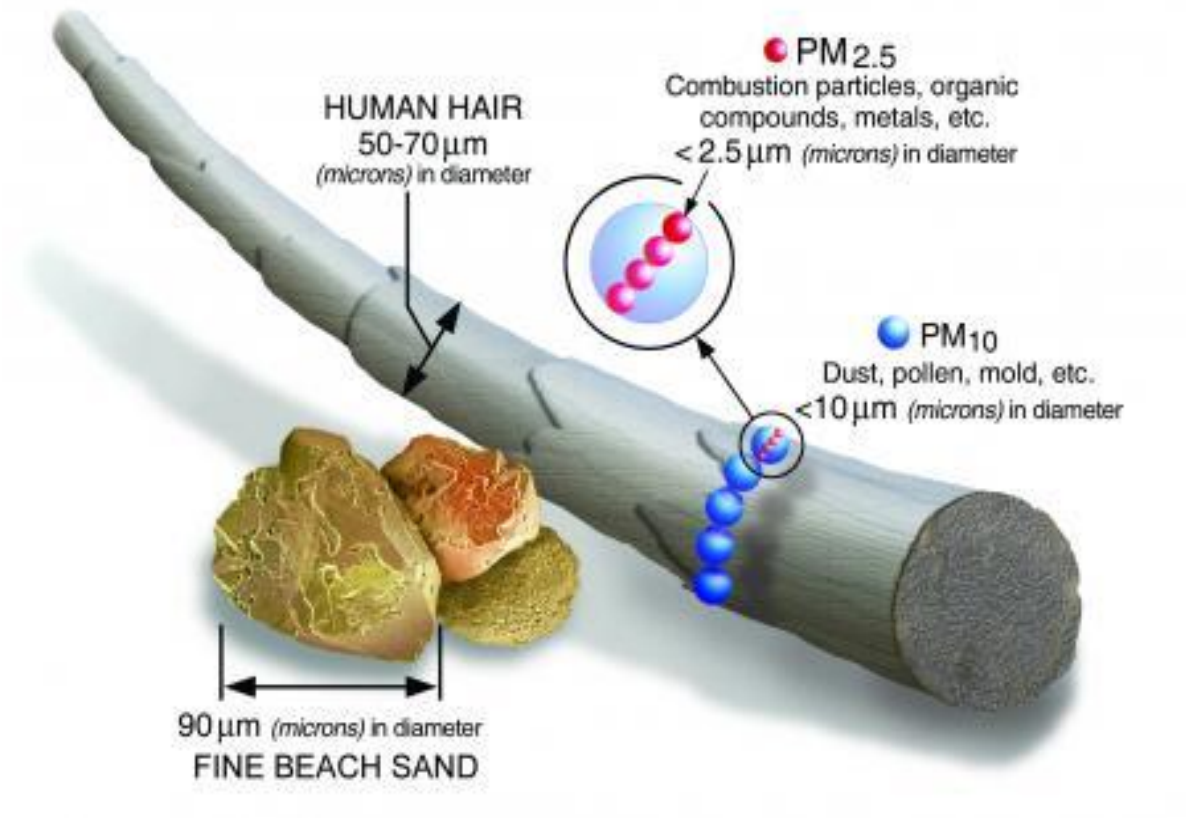
What is Particulate Matter?

Particulate matter is the term used for a mixture of solid particles and/or liquid droplets within the air. Particulate matter varies in size with some particles being easily visible to humans e.g. dust, soot, smoke and vapour from domestic boiler flues. However, some particles are so small that they cannot be seen with the naked eye, and it is these particles that are easily absorbed deep into the lungs and cannot be expelled when they are breathed in.

There are many sources of particulate matter in the United Kingdom, examples of these are: Vehicle exhausts, the wearing of brake pads, tyres and asphalt, Rust from vehicles, poor fuel combustion, dust from demolition and building sites, bonfires and inefficient burning of solid fuel e.g. wood.

Within the United Kingdom the main particulate matter that causes concern is particulates that are classed as ‘fine particles’ ($PM_{2.5}$) or ‘inhalable coarse particles’ (PM_{10}). The particles are measured in size and referred to as microns (µm). PM_{10} are particles that are 10 microns to 2.5 microns in size, and $PM_{2.5}$ are particles that are 2.5 microns or less.

Size of Particulate Matter



Source: United States Environmental Protection Agency (US EPA), 2020 - Size of Particulate Matter

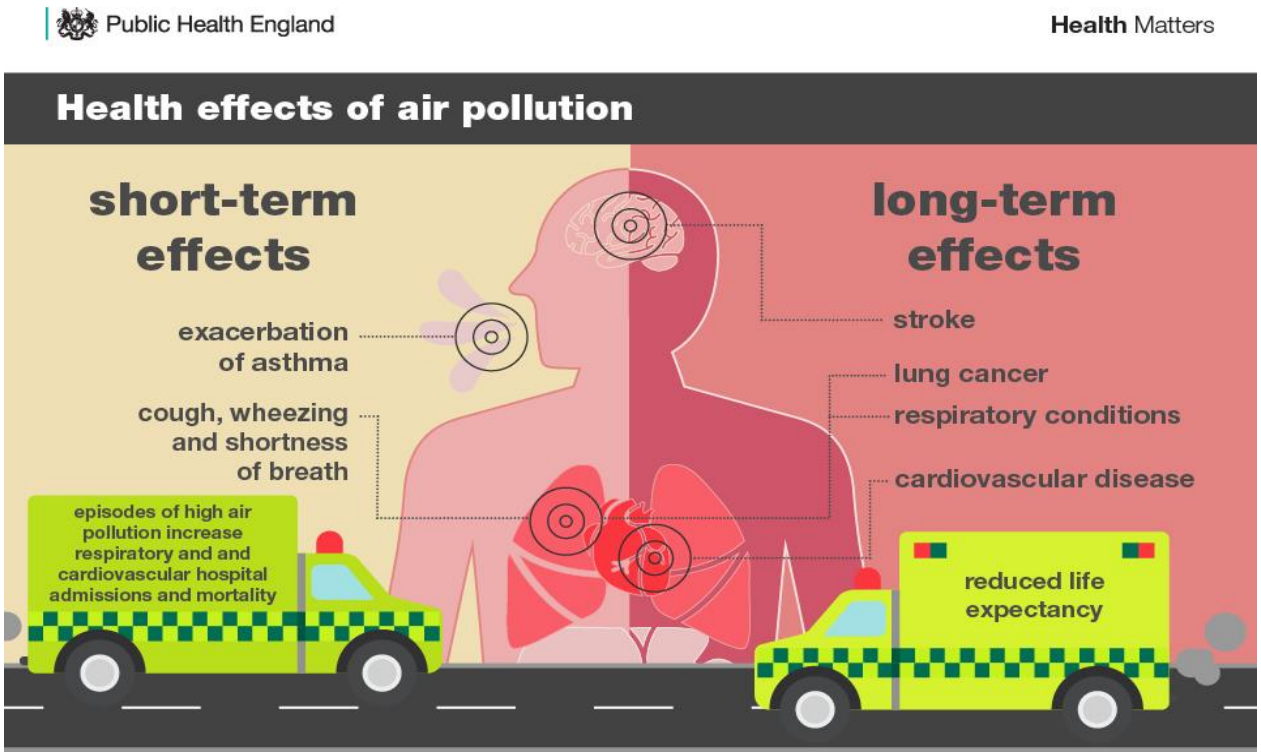
Research has shown that there is significant harm to health at concentrations of Particulate Matter well below the current EU and UK limit values. (See Appendix H for the Air Quality Objectives for the UK).

What are the Health Effects of Poor Air Quality?

Air pollution is associated with several adverse health impacts both short term and long term. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions.

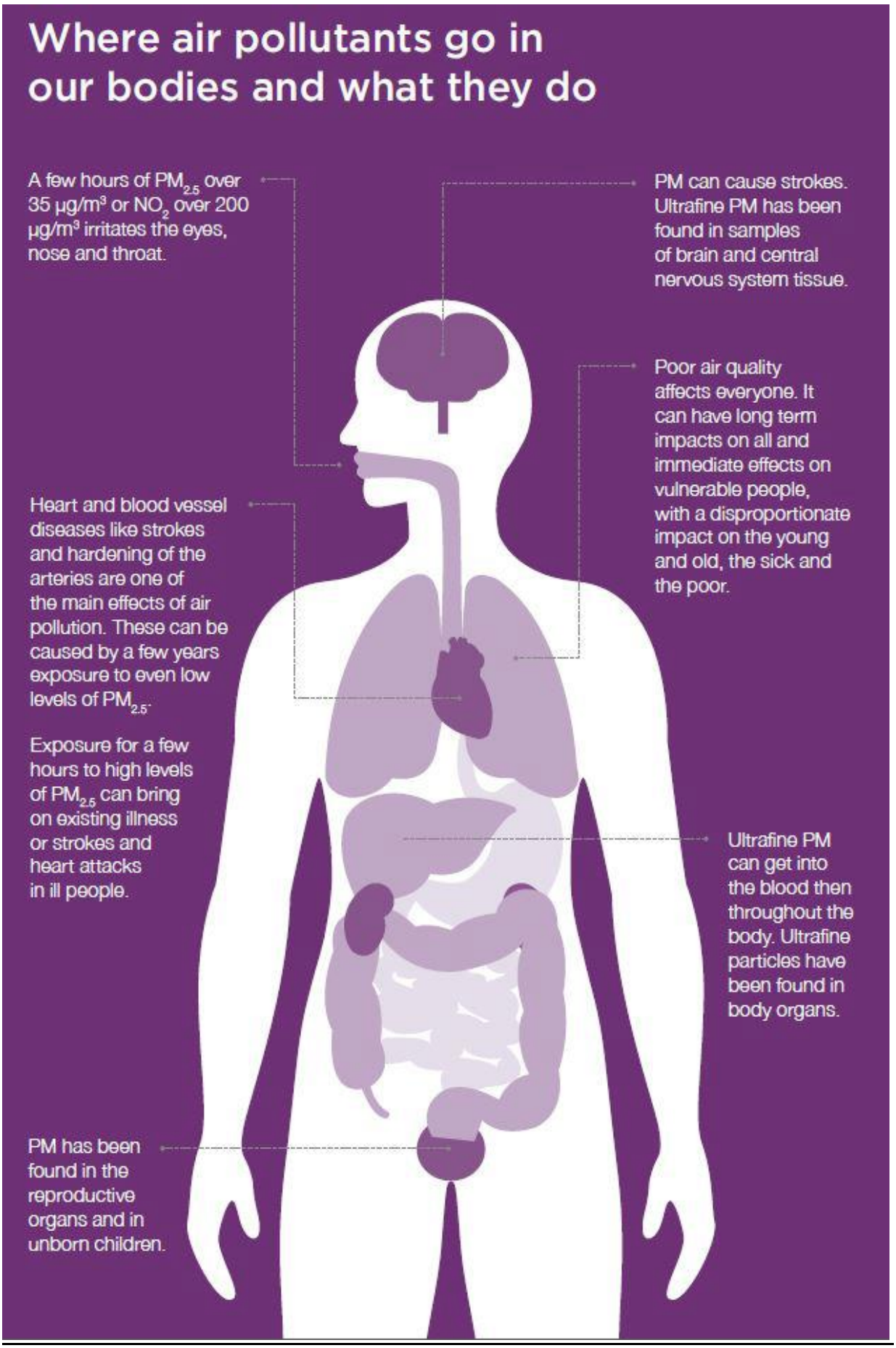
When people are within an area of poor air quality the length of time they are there is called the ‘exposure time’. There are two types of exposure, short-term and long term. Short-term is when the person is subjected to poor air quality for a short time e.g. a couple of hours and the effects are called ‘Short-term effects’. Long term exposure is when people are consistently living or working with in an area where there is poor air quality. The short-term and long-term effects on the body are shown in the diagram below.

The short and long-term effects of air pollution



Source – Health Matters 2018, Office for Health Improvement and Disparities

To be able to understand the full effects of poor air quality on humans an understanding of how the pollutants enter the body, where they go once, they are within the body and the effects that they have are shown in the diagram below.



Source - Air Quality: A Briefing for Directors of Public Health, March 2017 Air Quality: A Briefing for Directors for Public Health

Health Effects of Nitrogen Dioxide

The main health effect of breathing in raised levels of Nitrogen Dioxide is the increased likelihood of respiratory problems, as Nitrogen Dioxide inflames the lining of the lungs, and it can reduce immunity to lung infections. This can cause problems such as wheezing, coughing, colds, flu and bronchitis and can exasperate pre-existing conditions like asthma and Chronic Obstructive Pulmonary Disease.

The Committee on the Medical Effects of Air Pollution (COMEAP) has produced estimates of the attributable deaths of people aged 25+ due to NO_2 and Particulate Matter based on 36,000 for all local authorities in the United Kingdom. The estimates are based on the researched evidence of mortality risk combined with modelled levels of background air pollution to which populations are exposed to at each local authority. Table i provides the results for the East Midlands, Nottingham City and all the District and Borough Councils within Nottinghamshire.

Table i – Estimated Attributable Deaths in 2023 due to NO_2 and Particulate Matter based on 36,000.

Area	Attributable deaths Age 25+ due to NO_2 and PM based on 36,000	Associated Life-years Lost based on 36,000 (COMEAP Aug 18)
East Midlands	3,590	30,878
Nottingham City	196	2,004
Broxtowe Borough Council	90	787

Source: COMEAP, Associations of long-term average concentrations of Nitrogen Dioxide with mortality, 2018.

Table i shows that in the Borough of Broxtowe out of 787 life years lost, 90 of these are attributable to NO_2 and Particulate Matter. However, the data also identifies that Broxtowe

does not have the highest number of deaths that are attributable to air quality in comparison to other District and Borough authorities in Nottinghamshire.

Health Effects of Particulate Matter

The health effects associated with short term and long-term exposure to particulate matter are exacerbation of asthma, effects on lung function, increases in hospital admissions for respiratory and cardiovascular conditions, and also increases in mortality[1]. Office for Health Improvement and Disparities has produced estimates of the risk of mortality from particulates for all local authorities in the United Kingdom. The estimates are based on the researched evidence of mortality risk combined with modelled levels of background air pollution to which populations are exposed to at each local authority. See Section 2.3 of this report for further information on the estimated effects of annual mortality in 2023 of human made $PM_{2.5}$ air pollution.

Air Quality in the Borough of Broxtowe

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.

Air pollution particularly affects the most vulnerable in society, children, the elderly, and those with existing heart and lung conditions. Low-income communities are also disproportionately impacted by poor air quality, exacerbating health and social inequalities.

[1]Gowers, A.M. et al Estimating Local Mortality burdens associated with Particulate Air Pollution, Public Health England, 2017.

The main air quality issue within the Borough is due to the M1 and the A52. The A52 is the main road that connects Nottingham to Derby and is used heavily by commuters. Residential properties are situated alongside the M1 and the A52.

The main pollutants of concern within the Borough are Nitrogen Dioxide and Particulate Matter, which is emitted from vehicles exhausts and is prevalent in areas where there are congested roads e.g. the M1 and the A52. However, it must also be noted that ambient background levels are affected by emissions from domestic heating e.g. Oxides of nitrogen from boilers and particulate matter from solid fuel burners.

Broxtowe Borough Council participates in the United Kingdom Nitrogen Dioxide diffusion tube network and has 41 diffusion tubes sites throughout the Borough. The sites are primarily monitoring the M1 corridor and the A52. Monitoring is still being undertaken in the four revoked Air Quality Management Areas (AQMAs), to ensure that the concentrations remain below the air quality objective.

The 2024 nitrogen dioxide results show that the air quality levels are below the objective of 40µg/m^3 for all the monitoring locations throughout the Borough. The results and trends are discussed in greater detail in Section 3.2.1 of this report.

In respect of particulates, the modelled background level provided by Defra for the Borough of Broxtowe indicated levels between 7.2µg/m^3 and 9.2µg/m^3 for 2024, with the annual mean for 2024 being 8.1µg/m^3. The World Health Organisation (WHO) guideline level for $PM_{2.5}$ is 10µg/m^3.

Broxtowe Borough Council has a close working relationship with National Highways and Nottinghamshire County Council's Place Department who have responsibility for highways. National Highways manages the M1 Motorway and the A52, which run through the Borough. Nottinghamshire County Council Place Department manage the remaining roads that run through the Borough; this includes the A610/B600 Nuthall Roundabout.

The Council works with National Highways and Nottinghamshire County Council by continuing to monitor air quality levels throughout the Borough, to inform them of any changes to the air quality levels, to provide maps of the air quality management areas and to provide yearly air quality reports. By working together actions are implemented where possible to ease congestion by maintaining a steady flow of traffic throughout the Borough and to also promote sustainable travel.

The Environmental Health team at Broxtowe Borough Council also works closely with the Environment Agency who attend the Nottinghamshire Environmental Protection Working Group meetings along with some of the local authority planners. This ensures that air quality issues are raised and considered throughout the planning process.

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.

Below is a summary of the core actions to target sources of pollution in the Borough of Broxtowe over the past year.

- Phase Two of public consultations on Smoke Control Areas was undertaken in 2024.
- The current Smoke Control Orders were revoked and a new single Smoke Control Order was introduced which supports the Smoke Control Order Enforcement Policy **-** The Order was sealed by BBC and approved by Defra in late 2024. The Smoke Control Order will come into force in June 2025.
- To write an Electric Vehicle Infrastructure (EVI) Strategy for the Borough of Broxtowe - The Strategy is to facilitate access to a reliable Electric Vehicle Infrastructure (EVI) for residents, businesses and visitors, which will help to support the decarbonisation of transport and travel within the Borough. The Management Strategy for the expansion of EVI across Broxtowe Borough went to Cabinet in July 2024, and was adopted in July 2024
- An Investigation was undertaken to determine ways to decarbonise BBC's fleet through alternative fuels - A report was submitted to Cabinet in July 2023, which

approved the transition to HVO. The transition took place in April 2024. All refuse vehicles and fleet vehicles (where appropriate) are HVO.

- Low Emission Vehicle Procurement - BBC has purchased two new Euro 6 Refuse Collection vehicle in the financial year 24/25 replacing two older vehicles.
- Broxtowe Borough Council Cycle to Work Scheme – Five employees purchased bikes through this scheme in 2024. Since the scheme started, 194 employees have purchased bikes through the scheme.
- Increased provision for cycle parking in the Borough - A new cycle hub was installed in Toll bar square, Kimberley in 2024.

Further information on these core actions and progress on grant funded projects are discussed in greater detail in Table 2.2 of this document.

Conclusions and Priorities

The 2024 Nitrogen Dioxide results show that the air quality levels are below the objective of 40µg/m^3 for all the monitoring locations throughout the Borough including the AQMA. Although the objectives are being met it is very important to continue to improve air quality within the UK as poor air quality is a public health concern.

Therefore, to continue to improve the air quality in the Borough the priorities for Broxtowe Borough Council in addressing air quality for the coming year are to:

- Review the NO_2 diffusion tubes network annually, discontinue sites where the annual air quality levels are comfortably below the objective, and relocate them to new sites within the Borough if needed. Extensive monitoring will allow Broxtowe Borough Council to identify and focus on ‘problem’ areas.
- Continue to reduce the levels of NO_2 in the Borough by working with National Highways and Nottinghamshire County Council.
- Continue to promote the final version of the “EMAQN Air Quality and Emissions Mitigation: guidance for developers” document.
- Continue to be a member of the Nottinghamshire Environmental Protection Working Group, and to liaise with colleagues in Public Health and the Health and Wellbeing Boards (Nottingham City and Nottinghamshire County) to ensure that Air

Quality continues to be included in the Joint Health and Wellbeing strategy 2022-2026 and any future work. Engage with the public about air quality and raise awareness of the health effects of air quality.

- Continue to provide the public, companies and businesses within the Borough with methods that they can use to improve air quality for themselves and the health of their employees.
- Continue to provide information on green travel e.g. walking, cycling by providing leaflets.
- Continue to support bus companies and taxis that operate within the Borough to reduce emissions.
- Continue to review suitable research methods for reducing air quality levels for both NO_2 and particulate matter.

One of the challenges associated with addressing the air quality in the Borough is that the main source of the air quality problem is the M1 Motorway, which is managed by National Highways and is not under the control of Broxtowe Borough Council. Although Broxtowe Borough Council have a close working relationship with National Highways it is unable to impose or make any changes to the M1 to improve the air quality within the neighbouring residential areas. However, National Highways has undertaken projects at great expense in the past to improve the air quality within the Borough e.g. widening scheme and Smart Motorway scheme.

Apart from the M1 and the A52 all the roads within the Borough are managed by Nottinghamshire County Council who manage the traffic flows, repairs, diversions etc. There are several challenges associated with this. The first challenge is that Broxtowe Borough Council is unable to impose or make any changes to the structure or flow of the roads. The second challenge is the limited funding currently available to County Council for significant integrated transport improvements (£3.9m per year for all safety, capacity, active travel, parking, bus and traffic management infrastructure improvements). This limits the funding available for transport schemes that will deliver air quality improvements.

Local Engagement

Broxtowe Borough Council was selected in 2018 to be in the Air Quality Task and Finish Group, which was set up to update the Nottinghamshire Air Quality Strategy (NAQS). The draft NAQS was approved at the Nottinghamshire County and City Health and Wellbeing Boards in 2019 and the finished format of the NAQS has been endorsed by the portfolio holders and is now published online. Improving Air Quality is now a priority of the Nottinghamshire Joint Health and Wellbeing Strategy 2022-2026 as part of the Ambition to develop Healthy and Sustainable Places.

Air Quality also forms part of the Spatial Planning and Health Framework and Health Impact Checklist produced and used for Local Development Plans.

How to get Involved

Residents and businesses living or working in Nottinghamshire can improve the air quality in the area by taking simple measures. One of the main changes that can be made is to use sustainable travel more and reduce dependency on the car when possible. Below are some of the actions that people can take, and particularly for short journeys.

- Travel Choice – Nottinghamshire County Council's Travel Choice webpages provide information and advice on the different ways to travel around Nottinghamshire, whether that's walking, cycling, public transport or car sharing. Residents, jobseekers, businesses and employees can find travel information and advice for the county (including bus and cycle maps, leisure 'Routes and Rides' and a journey planner) at Travel Choice
- School Travel Toolkit – Aimed at school leaders, teachers, parents/carers, children, and those living near to our schools, the Nottinghamshire School Travel Planning Toolkit provides information and advice on improving travel to and from Nottinghamshire's schools, including the sustainable and active travel modes available. The toolkit can be found at School Travel Toolkit
- Public transport – To use all means of public transport whenever possible e.g. trams, buses and trains. In addition to printed materials, an integrated public transport planning tool detailing local bus, rail and tram networks, as well as for trips further afield can be found at Travel Choice Journey Planner and Traveline

Details on travelling on school buses to Nottinghamshire schools and assistance available to do so, can be found at Travel to Schools. The tram timetable is available at Tram Timetable.

- Car share – The Nottinghamshire car share scheme, *'nottinghamshare'*, is available to anyone Car Share Scheme but all businesses can produce their own.
- Park and Ride – There are a variety of Park and Ride sites within Nottinghamshire, which serve the Nottingham Tram and buses. Information for these Park and Ride sites which includes maps of their locations are found at Park and Ride
- Walking and Cycling – The health benefits of physical activity e.g. walking or cycling outweigh the risks from air pollution. You can easily avoid the worst pollution by travelling along quieter streets. Even walking on the side of the pavement furthest from the road can help.

  Walking.

  - Walk short distances rather than drive; this also has the benefit of improving your health as well.
  - Information on walking networks in Nottinghamshire can be found at Walking Networks and Rights of way when walking in Nottinghamshire and a planning tool for deciding your route when walking can be found on the Travel Choice website
  - Walking and cycling to school – School travel plans promote group cycling and walking for pupils to safely get to school. Information on the travel to school options can be found at Travel to Schools Options.

  Cycling.

  - Use the extensive cycle routes that are available throughout Nottinghamshire. Maps and cycling journey planners that cover Nottinghamshire, including Broxtowe are available on the Travel Choice website and at Cycling Rights of Way in Nottinghamshire. Maps of just the city cycle routes for Nottingham are available at Cycle Maps for Nottingham. Sustrans is a charity that promotes sustainable travel and further information can be found at Sustrans

RideWise, a local cycling charity, also provide advice, training, bike rides, free bike loans and information about routes and journey planning. Further information about RideWise can be found at RideWise

- Driving- When you have to drive you can still help to improve air quality by;
    - Make sure that your car is at its most efficient and think about how you drive, this will also save you money. Tips on how to save money on fuel and reduce your emissions are available at Driving Advice from Energy Saving Trust.
    - If you are thinking about changing your car consider buying a low-emission vehicle, you can get more information on these vehicles and the support available at Electric vehicle charging in and around Nottinghamshire
- Bonfires – To not have bonfires at all and to compost all garden waste and recycle rubbish rather than burn it.
- Heating your home –
    - Smoke Control Area – Large parts of Nottinghamshire are smoke control areas; therefore, you cannot emit smoke from a chimney unless you are burning an authorised fuel or using an exempt appliance e.g. some burners or stoves. Further information on suitable fuels and exempt appliances can be found at Smoke Control Information from Defra All appliances must be kept in good working order to ensure that they are working efficiently and it is advised that you contact your Local Council to determine whether you are in a smoke control area or not.
    - House Boilers – Ensure that boilers are serviced regularly and kept in good working order. If a boiler needs replacing, then purchase one that has a low NOx emission rating

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1 Local Air Quality Management

This report provides an overview of air quality in Broxtowe Borough Council during 2024. 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 Broxtowe 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

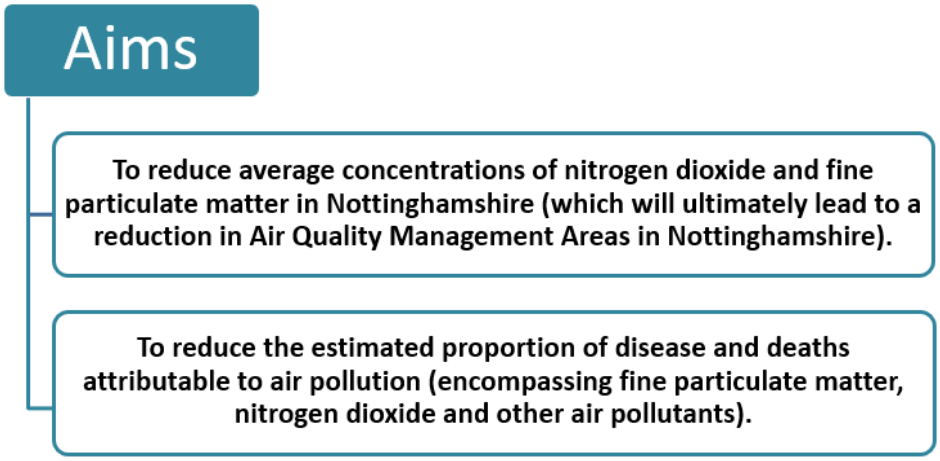
Air Quality Management Areas (AQMAs) are declared when there is an exceedance or likely exceedance of an air quality objective. After declaration, the authority should prepare an Air Quality Action Plan (AQAP) within 18 months. The AQAP should specify how air quality targets will be achieved and maintained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

Broxtowe Borough Council currently does not have any declared AQMAs. A joint Nottinghamshire Air Quality Strategy is in place to prevent and reduce polluting activities.

Local Air Quality Strategy

Although Broxtowe Borough Council does not have an air quality strategy solely for this Borough, this ASR is written in alignment with the aims and objectives of the Air Quality Strategy for Nottingham and Nottinghamshire 2020-2030. **Air Quality Strategy for Nottingham and Nottinghamshire 2020-2030.**

This Joint Air Quality Strategy has been developed collaboratively across Nottinghamshire authorities (taking into account the DEFRA Air Quality Strategy factsheet in relation to joint Air Quality Strategies, which is available from the DEFRA Air Quality Hub, https://www.airqualityhub.co.uk/) and sets out the steps the local authorities will take to improve local air quality. This joint approach ensures that local authorities including Broxtowe Borough Council are collectively addressing air quality concerns while still considering local-level priorities. Its aims are to encourage prevention and reduction of polluting activities across a range of diverse sectors.



The Strategy establishes the regional steps authorities will take to improve air quality while maintaining flexibility for local implementation. It is reviewed regularly by the Nottingham and Nottinghamshire Air Quality Oversight Group (NNAQOG) to remain up to date and to provide progress updates to the County and City Health and Well-Being Boards.

The NNAQOG includes colleagues from City and County Local Authorities and consists of Public Health, Environmental Health, Transport Planning and the local NHS; with input also from National Highways, Environment Agency, UKHSA, among others. Additionally, engagement with the mayor's office for the East Midlands Combined County Authority (EMCCA) will be sought at the earliest opportunity.

Other Local Strategies

The Nottinghamshire Joint Health and Wellbeing Strategy 2022 – 2026 has four ambitions one of which is to Create Healthy and Sustainable Places:

- We'll ensure that the environment we grow, live, work and age in promotes good health and wellbeing.
- We'll use the planning and transport system, along with economic planning, licensing and policy decisions, to create places that do this.

This will also help to reduce health inequalities and benefit the environment, for a better quality of life. There are nine areas of focus and one of them is Air quality, which states that:

“Clean air is essential for good health and for the environment and climate. We will work to make positive changes which can also have positive Air Quality - Ensure that outdoor air quality supports healthier lives in all communities’ effects in terms of travel to school and work, being active and safety.”

The Nottingham and Nottinghamshire ICS Green Plan 2022 to 2025 recognises the importance of the NHS taking action to reduce air pollution and work with partners to improve air quality. The Plan includes the following ambitions:

- Promoting sustainable transport and reducing overall transport
- Increasing the use of ULEV and ZEV vehicles
- Developing the infrastructure to support lower carbon transport options
- Enhancing understanding and communication via Green Travel Plans

The Nottingham and Nottinghamshire ICS Health Inequalities Strategy 2020-2024 has a strategic objective for system partners to work together to support action to improve air quality.

Air Quality and Climate Change

Many sources of air pollution are also sources of greenhouse gas emissions e.g. combustion creates CO_2, NOx and PM. Emissions from road transport, energy and heat generation and domestic solid fuel burning are some of the most common sources that contribute to both climate change and air pollution.

Broxtowe Borough Councils Climate Change and Green Futures Strategy 2023-2027 has ten strategic themes to identify, manage and mitigate the worst impacts of Climate Change.

Climate Strategy	Transport and Travel
Energy and Water	Built Environment
Core Strategy and Planning	Recycling and Resources
Natural Environment	Communities
Business and Supply Chain	Communications

Air Quality Monitoring is included in the Natural Environment theme and as climate change mitigation measures reduce emissions of greenhouse gases it will also help reduce air pollutants and lead to improvements in health outcomes as evidenced in Health Effects of Climate Change (HECC) in the UK: 2023 report.

.

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

Defra's appraisal of last year's ASR concluded that.

- The BBC justification to use the national bias factor instead of the local bias factor shows a high level of technical understanding, and the reference to Section 7.221 TG22 further amplifies this understanding. BBC is encouraged to continue with this level of consideration and scrutiny in determining the application of bias – **BBC will continue to do this.**
- The executive summary provides additional information about NO2 and particulate matter, as well as the health impacts of both. This is a welcome addition and should be continued in future ASRs – **BBC will continue to do this.**
- The report is descriptive and informative throughout with each section providing a significant amount of detail, this is appreciated and encouraged to continue in future ASRs. Overall, this report can be considered an example of good practice due to provision of the required information and significant further detail provided throughout **– BBC will continue to do this.**
- The colour coded system describing why there were missing results in the monthly results table, is a creative and clever way of providing an extra detail about the monitoring results. This is a welcome addition and should be continued in future ASRs **– BBC will continue to do this.**
- The engagement with the public in a consultation on revoking the twenty-one Smoke Controls Areas with a single Borough Wide Smoke Control Order, is a great example of involving the public in the development of borough-wide air quality measures.

Broxtowe Borough Council has taken forward a number of direct measures during the current reporting year of 2024 in pursuit of improving local air quality. Details of all measures that are completed, in progress, or planned are set out in Table 2.1. One hundred and fourteen measures are included within Table 2.1, with the type of measure, and the progress Broxtowe Borough Council have made during the reporting year of 2025 presented. Where there have been, or continue to be, barriers restricting the implementation of the measure, these are also presented within Table 2.1.

Table 2.2 is colour coded with the Three Key measures for Broxtowe Borough Council in yellow, the measures that were completed in 2024 are in blue and the measures that were completed between 2017 – 2023 are in green. Where there have been, or continue to be, barriers restricting the implementation of the measure, these are also presented within Table 2.1.

More detail on these measures can be found in their respective Action Plans BBC Air Quality Action Plan, BBC Improving the Air We Breathe Action Plan, The Air Quality Strategy for Nottingham and Nottinghamshire 2020-2030, BBC Local Plan 2018 – 2028, The Nottinghamshire Local Transport Plan 2011 -2026 (and its Implementation Plans), Nottinghamshire County Council's Environment Strategy and Action Plan 2020 and National Highways Reports (post opening project evaluation reports for the M1 Junction 25 to 28 widening and the A52 West of Nottingham Corridor Improvements).

Key completed and on-going measures are:

- Phase Two of public consultations on Smoke Control Areas was undertaken in 2024.
- The current Smoke Control Orders were revoked and a new single Smoke Control Order was introduced which supports the Smoke Control Order Enforcement Policy **-** The Order was sealed by BBC and approved by Defra in late 2024. The Smoke Control Order will come into force in June 2025.
- To write an Electric Vehicle Infrastructure (EVI) Strategy for the Borough of Broxtowe - The Strategy is to facilitate access to a reliable Electric Vehicle Infrastructure (EVI) for residents, businesses and visitors, which will help to support the decarbonisation of transport and travel within the Borough. The Management Strategy for the expansion of EVI across Broxtowe Borough went to Cabinet in July 2024, and was adopted in July 2024
- An Investigation was undertaken to determine ways to decarbonise BBC's fleet through alternative fuels - A report was submitted to Cabinet in July 2023, which approved the transition to HVO. The transition took place in April 2024. all refuse vehicles and fleet vehicles (where appropriate) are HVO.

- Electric Vehicle Infrastructure (EVI) Strategy - The Strategy is to facilitate access to a reliable Electric Vehicle Infrastructure (EVI) for residents, businesses and visitors, which will help to support the decarbonisation of transport and travel within the Borough. The Management Strategy for the expansion of EVI across Broxtowe Borough was approved by Cabinet and adopted in July 2024.
- Low Emission Vehicle Procurement - BBC has purchased two new Euro 6 Refuse Collection vehicle in the financial year 24/25 replacing two older vehicles.
- Increased provision for cycle parking in the Borough - A new cycle hub was installed in Toll bar square, Kimberley in 2024.
- To undertake a data quality review of boiler information held for Council Properties to determine whether they have been included in the replacement programme.
- To investigate and consider new heating technologies that are more efficient, effective and produce lower emissions **-** A trial was undertaken for fitting air source heat pumps in 7 new builds in 2021 and in 5 new builds in 2022. The trialwas completed and included in future specifications to install air source heat pumps instead of gas boilers if possible. Air source heat pumps are now installed in the Councils new build properties (except Section 106).
- To undertake a data quality review of boiler information held for Council Properties to determine whether they have been included in the replacement programme - BBC will be undertaking a data quality review on boiler information held for the properties in question as we believe these may have already been incorporated in replacement programmes - this was completed in 2024.
- To continue to replace Broxtowe Borough Council older combination boilers and system boilers to Seasonal Efficiency of a Domestic Boiler in the UK (SEDBUK) A rated condensing boilers.
- To continue to use funding to decarbonise and better insulate social housing.
- To investigate and consider suitable alternative replacements for the remaining electrically heated Council properties - High heat retention units were being fitted as replacements in 2022 and this will be continuing in future years. Air source heat pumps will also be considered at suitable properties where a retro fit solution is possible.

- ❖ Broxtowe Borough Council Cycle to Work Scheme – Five employees purchased bikes through this scheme in 2024. Since the scheme started, 194 employees have purchased bikes through the scheme.
- ❖ Installation of 7kW electric vehicle (EV) charge points at BBC Kimberley Depot for Public Sector Fleet Vehicles - Four new 7kW electric vehicle (EV) charge points were installed at Kimberley Depot (increasing the number to six) in 2024. The charge points form part of a network of public sector organisations who have agreed to share the EV charge points which will enable the delivery of collective efficiencies in EV operations across the region. These charge points are for the use of any Council operated fleet across the region.
- ❖ Development of Local Cycling and Walking Infrastructure Plan (LCWIP) - A D2N2 Local Cycling and Walking Infrastructure Plan (LCWIP) has been developed. - The D2N2 LCWIP will become the responsibility of the East Midlands Combined County Authority (EMCCA) and will be reviewed and continue to evolve and develop over time.
- ❖ Marketing and promotion of sustainable transport alternatives – both the County Council and Broxtowe Borough Council continue to develop and deliver programmes to encourage more sustainable travel. These include infrastructure improvements such as the County Council's integrated transport programme delivering improvements for pedestrians, cyclists and bus users; cycle training, as well as marketing materials and campaigns developed in partnership with stakeholders such as passenger transport operators.
- ❖ Nottinghamshire on-street EV charging pilot scheme - electric vehicle cable channels (EVCC) – NCC successfully secured (and received in January 2023) £774k from the Government's Local Electric Vehicle Infrastructure (LEVI) Pilot Funding enabling the delivery of up to 300 EV cable channels. Delivery started in February 2023, with a total of 81 cable channels installed in the county up to the end of the 2024/25 financial year.

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

- ★ To develop an implementation plan for the Nottingham and Nottinghamshire Air Quality Strategy 2020-2030 to ensure it is implemented locally by the Nottingham

and Nottinghamshire Air Quality Oversight Group (NNAQOG), Broxtowe Borough Council is a member of the NNAQOG.

- ★ To replace cremators and associated plant including abatement system at Bramcote Crematorium - The new cremators are now installed, building works and installation of the new abatement plant is ongoing and will be completed summer 2025.
- ★ Promoting on the Council Webpage the Council's Electric Vehicle Charging Points Network within the Borough - Four new charging points to be added in Stapleford in 2025.
- ★ To review the Climate Change and Green Futures Strategy 2023-2027 – To review the Climate Change and Green Futures Strategy that was approved in 2022 and is currently undergoing a second review to ensure it is up to date and relevant.
- ★ To investigate the feasibility of increased provision for cycle parking in the Borough - Three Sites and routes being investigated in 2025.
- ★ To investigate the provision of an E bike Scheme within the borough - On-going discussion with Lime bikes. Implementation expected of trial early 2025.
- ★ To reschedule the dry recycling waste rounds to reduce fuel consumption and improve efficiency - The round reschedule is currently in progress. Completion is anticipated in September 2025.

Broxtowe Borough Council's priorities for the coming year are predominantly through measures to make the best use of the transport networks and through smarter travel measures that will encourage people to travel more sustainably.

Measures will include:

- On-going effective land use planning and securing of appropriate levels of developer contributions for mitigation (including travel planning) and sustainable transport improvements
- Traffic control and information provision to minimise disruption and delay on County Council managed roads (including the A610) such as contingency planning, the effective co-ordination of works and the provision of real-time travel information
- Measures to reduce the need to travel at peak times such as the provision and encouragement of flexible working arrangements
- The facilitation of smarter travel behaviour such as the provision of a car sharing scheme and integrated and concessionary ticketing schemes

- The encouragement of smarter travel behaviour such as the marketing and promotion of passenger transport, walking and cycling, provision of cycling and walking route maps, cycle training programmes, and web-based journey planners
- The encouragement of the uptake of low-emission vehicles, including the continued identification and implementation of the Nottinghamshire public electric vehicle charging network as well as grants for businesses to install on-site charging infrastructure
- Enhancements to the local cycling and walking networks
- Travel planning such as the development of new travel plans at businesses across the County through planning conditions

Broxtowe Borough Council worked to implement these measures in partnership with the following stakeholders during 2024:

- All Nottinghamshire Local Authorities including Nottinghamshire County Council – Environmental Health, Public Health and Transport Plans and Programme Development Team

The principal challenges and barriers to implementation that Broxtowe Borough Council and Nottinghamshire County Council anticipates facing are:

- Availability of funding for the above measures to continue their delivery
- Ensuring sufficient mitigation is secured through the development control process to address the potential impacts on the highway network of not only individual developments but also the cumulative impacts of development.

Progress on the following measures has been slower than expected due to:

- Promoting travel choices - Consideration of car club into the County - Dependent on the determination of business case and commercial operator coming forward.

Barriers include financial risk, organisational culture (i.e. using personal cars less) and specific service needs.

Whilst the measures stated above and in Table 2.1 will help to contribute towards improving the air quality, Broxtowe Borough Council anticipates that further additional measures not yet prescribed will be required in subsequent years to improve the air quality in the borough.

Table 2.1 – Progress on Measures to Improve Air Quality

Measure No.	Measure	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Year	Organisations Involved	Funding Source	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	**Install energy efficiency measures to Council housing properties to improve ECP ratings to C.**	Other	Other	2024	2028	BBC Capital Works - Capital Works Manager	Partially funded by the Council (housing revenue account and borrowing) and part funded through grant funding from DESNZ.	Funded	£1m-£10m	Implementation	Reduced Emissions	Reduced carbon emissions due to lower heating demand of properties	• Wave 3 energy efficiency measures to be on site in September 2025 until 2028. • 55 properties completed in 2024/25. On completion of the project in 2028, it is planned over 400 properties will have received	An update on this new measure will be in the 2026 ASR.
2	**Implementation of the Electric Vehicle Infrastructure (EVI) Strategy**	Policy Guidance and Developmental Control	Low Emission Strategy	2025	2027	BBC – Climate Change Manager	LA-BBC and NCC	Funded	-	Implementation	Reduction in NO2 and PM due to increased use of Electric Vehicles	% Usage of EVCP	• Feasibility of electric vehicle charging points underway in the borough where deemed appropriate. • NCC out to tender for LEVI (local Electric Vehicle Infrastructure for EVCP	EVI Strategy publicly available at Electric Vehicle Charging Infrastructure Strategy Update will be provided in the 2026 ASR
3	**Implementation of the Smoke Control Order**	Policy Guidance and Developmental Control	Other Policy	2024	2030	BBC – Public Protection – Senior Environmental Health Officer	LA-BBC	Funded	£1k -£10k	Implementation	Reduction in particulates	Completion of implementation plan	• The Order was sealed by BBC and approved by Defra in late 2024. The Smoke Control Order will come into force in June 2025.	Update will be provided in the 2026 ASR
4	**Light rail tram infra-structure**	Transport Planning and Infrastructure	Public transport improvements-interchanges stations and services	2015	On-going	NCiC and NCC	DfT/WPL funding	Funded	>£10 Million	Completed	Reduction in NO_2 and PM	Increased passenger transport patronage	• The light rail/tram system, Nottingham Express Transit (NET), provides services between the city centre and local centres, such as Hucknall and Beeston. There are two park and ride sites located within the county, at Hucknall and Toton Lane, which serve the NET network, allowing commuters and visitors a safe place to park their vehicle and catch the tram into the to the city centre. • NET Phase 2 (with route through	On-going

Measure No.	Measure	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
													Broxtowe) opened 2015. • In 2022-23, there were 2.5 million passengers using the tram, which showed a growth of 50% in comparison to the previous year, but still below pre-pandemic levels.	
5	**Promoting travel choices - Consideration of car club into the county**	Alternatives to private vehicle use	Car Clubs	TBD	Ongoing	NCC/NCiC	NCC	TBD	-	Ongoing	Reduction in NO_2 and PM	Restrain average journey times in the morning peak to a 1% increase per year A reduction in staff business emissions and cost, through both a car club and a wider review of staff travel habits.	• NCiC scheme introduced in 2014, with the provider reviewed in 2018. Expansion of scheme into county dependent on its success, which is still unclear. • Work has been undertaken to look at the feasibility of a partnership with a Car Club operator in the county, for both residents and internal use (i.e. staff travel). The work will feed in to a wider fleet review and review of staff business travel, with a few more aspects to be expanded upon. • Funding for implementation to be determined.	Dependent on the determination of business case and commercial operator coming forward. Barriers include financial risk, organisational culture (i.e. using personal cars less) and specific service needs.
6	**Nottinghamshire on-street EV charging pilot scheme - electric vehicle cable channels (EVCC)**	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	2022		NCC / Via EM Ltd	Privately funded by resident and OZEV LEVI Pilot Funding	Privately funded by resident and OZEV LEVI Pilot Funding	Costs to be determined	Implementation	Reduction in pollutants and emissions due to increased use of low emission vehicles.	Number of EVCC installed and back-office data from EV charge point	• NCC approved the trialling of on-street EV charging cable channels at Transport and Environment Committee in February 2022. • NCC successfully secured (and received in January 2023) £774k from the Government's Local Electric Vehicle Infrastructure (LEVI) Pilot	NCC's EV cable channel pilot programme is currently in progress. The pilot is privately funded by resident (EV chargepoint) and OZEV LEVI Pilot Funding

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													Funding enabling the delivery of up to 300 EV cable channels. • Delivery started in February 2023, with a total of 81 cable channels installed in the county up to the end of the 2024/25 financial year.	
7	**Nottinghamshire EV charging infrastructure (potentially on and off street)**	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	2023/2024	2025/26	NCC / Borough and District Councils	OZEV funding (LEVI)	Funded	£1 million to £10 million	Implementation	Reduction in pollutants and emissions due to increased use of low emission vehicles.	Number of EV charging installed and back-office data from EV charge point	• NCC have developed an Electric Vehicle Charepoint Framework for the county. • NCC secured funding from DfT for EV infrastructure. The procurement process is ongoing, with contract award expected by autumn 2025.	Measure is reliant on a successful LEVI bid £5.522m of external LEVI revenue and capital funding secured for EV infrastructure programme development.
8	**To develop an implementation plan for the Nottingham and Nottinghamshire Air Quality Strategy 2020-2030**	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2024	2030	NCC/NCiC/ Borough and District councils	N/A	Not Funded	N/A	Planning	Reduced Emissions from raising awareness	Improving Air Quality, reduced Emissions and Raising awareness	To develop an implementation plan for the Nottingham and Nottinghamshire Air Quality Strategy 2020-2030 to ensure it is implemented locally by the Nottingham and Nottinghamshire Air Quality Oversight Group (NNAQOG), Broxtowe Borough Council is a member of the NNAQOG.	2025
9	**To continue to promote the Nottingham and Nottinghamshire Air Quality Strategy 2020-2030**	Public Information	Via the Internet	2020	On-going	BBC Public Protection – Environmental Health Officer	N/A	Not Funded	N/A	On-going	Reduced Emissions from raising awareness	Improving Air Quality, reduced Emissions and Raising awareness	•The NAQS was endorsed by portfolio holders in 2020, and it is promoted on BBCs website.	On-going
10	**To investigate providing Supplementary Planning Guidance or a Supplementary Planning Document relating to 'Air Quality and Emissions Mitigation**	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2021	To be decided	BBC Planning Policy Department – Planning Policy Team Leader	LA-BBC	Not Funded	N/A	Planning	Reduced Emissions of N02 and PM	Reduced emissions	Possible measures could involve: • Supplementing Part 1 of Policy 20 of the Local Plan to provide further guidance on what reasonable steps are required in order to encourage the use of public transport.	Planning policy work is currently prioritising the preparation of the Greater Nottingham Strategic Plan (GNSP), which is likely to be published in Spring 2025 and examined later in 2025 and adopted in 2026. The GNSP will incorporate policies relating to air quality and emissions mitigation.

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	Guidance for Developers'												• Supplementing Part 2 of Policy 20 of the Local Plan to say what would constitute a "significant deterioration" in air quality. • Supplementing Part 3 Policy 20 of the Local Plan to set a ratio of Electric Vehicle Charging Points to new dwellings. • Promoting Travel Choices – Encouraging developers to provide occupants with 'travel packs' regarding public transport, walking and cycling to all new built homes.	
11	**To replace cremators and associated plant including abatement system at Bramcote Crematorium**	Environmental Permits	Other	2023	2025	BBC Project Manager, Capital Works	General fund, borrowing 50-50 split with Erewash Borough Council	Funded	£1m-£10m	Implementation	Reduced Emissions	Reduced emissions due to more efficient cremators and plant	Measures to reduce pollution through replacing the current cremators to ones that using the Best Available Techniques (BAT) which are the best for preventing or minimising emissions and impacts on the environment. The new cremators are now installed, building works and installation of the new abatement plant is ongoing and will be completed summer 2025.	An update on this new measure will be in the 2026 ASR.
12	**Inspection of Permitted Processes**	Environmental Permits	Other Measures through permit systems and economic instruments	2012	On-going	BBC Public Protection – Environmental Health Technical Officer	N/A	Not Funded	N/A	On-going	Reduced Emissions	Reduction in airborne pollutants from the various processes throughout the Borough.	All scheduled inspections completed on time.	On-going
13	**To ensure that all Permitted Processes (where feasible) continue to be rated as 'low**	Environmental Permits	Measures to reduce pollution through IPPC Permits going beyond BAT	On-going	On-going	BBC Public Protection – Environmental Health Technical Officer	N/A	Not Funded	N/A	On-going	Reduced Emissions	Reduction in airborne pollutants from the various processes throughout the Borough.	The risk rating did not change in 2024, and all permitted processes were fully compliant.	On-going

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	environmental risk'													
14	**To Inspect Crushers that are used within the Borough on demolition sites when notifications are received to ensure compliance with the process permit and ensure good housekeeping is being maintained**	Environmental Permits	Other measure through permit systems and economic instruments	On-going	On-going	BBC Public Protection – Environmental Health Technical Officer	N/A	Not Funded	N/A	On-going	Reduction in airborne particulates from the crushers used throughout the Borough.	Reduction in airborne particulates from the crushers used throughout the Borough	Reduction in airborne particulates from the crushers used throughout the Borough	On-going
15	**To ensure that all Dust Management Plans are reviewed and approved during the planning application stage**	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	On-going	On-going	BBC Public Protection – Environmental Health Officers	N/A	Not Funded	N/A	On-going	Reduction in airborne particulates from new developments throughout the Borough.	% of dust management plans that are reviewed and approved during the planning stage	All dust management plans were reviewed and approved during the planning stage in 2024.	On-going
16	**Co-ordination of street works**	Traffic Management	UTC, Congestion management, traffic reduction	On-going	On-going	NCC/Via EM/NCiC	NCC and NCiC revenue funding	Funded	Funded within existing resources	On-going	Reduced emissions by reducing congestion on the roads	Restrain average journey times in the morning peak to a 1% increase per year	• NCC introduced a street works permit scheme on 1 April 2020 to help plan/coordinate roadworks on its managed highway network. Street works management is undertaken by Via EM on behalf of NCC. The fundamental aim of the coordination/inspection regime is to facilitate necessary works, whilst minimising disruption by reducing duration etc. • Regular coordination meetings held between all works promoters and regional partners in additional to regular meetings between	Costs are dependent on number street works undertaken

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													NH and regional partners to create a framework programme of planned works affecting strategic and local routes. • Detailed journey time monitoring undertaken annually since 2005/06.	
17	**Traffic control and management contingency planning, and effective event and incident management**	Traffic Management	UTC, congestion management, traffic reduction	Ongoing	Ongoing	NCiC / NCC / Via EM / National Highways (NH)	NCiC / NCC / NH revenue funding	Funded	£100k - £500k	Implemented and ongoing	Reduced emissions of N02 and PM by reducing congestion on the roads	Restrain average journey times in the morning peak to a 1% increase per year	• The local operating agreement between NCC and NH has been comprehensively reviewed to identify the relevant parts of the network which have interaction on each authority and to put in place appropriate communication channels for management of incidents and dissemination of information. • Key locations on the local network have been identified and associated diversion routes investigated in line with the developing network hierarchy. • Incidents dealt with through agreed procedures and regular partnership meetings held. Working in close collaboration with the NCiC and NH, tactical diversion routes have been developed for the emergency diversion of traffic from any part of the strategic road network, to reduce the delay in rerouting traffic to ease congestion at the time of incidents. • Detailed journey time monitoring undertaken annually since 2005/06.	A potential barrier to this work is a lack of future revenue funding. The UTCC is a shared facility between NCC and NCiC. Estimated cost shown is NCC's annual contribution. Cost dependent on the number of incidents.

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													• A traffic control centre monitors traffic movement on the local highway network (not the trunk road/motorways) and provides real time traffic control over many traffic signal installations, including on A610 at Nuthall	
18	**Traffic management control patrols on arterial route through the Borough at peak period travel times to identify hot spots where parking affects the traffic flow**	Traffic Management	UTC, Congestion management, traffic reduction	2019	On-going	NCC	NCC	Funded	Not known	On-going	Reduced emissions by reducing congestion on the roads.	Number of visits to the locations and number of observations during the visits.	•All main routes into, out of and through the Borough are patrolled regularly and enforcement action where necessary is taken. If areas suffer as a result of road works patrols are increased to ensure the smooth flow of traffic.	On-street parking patrol activities now comes directly under Nottinghamshire County Council
19	**Moving Traffic Enforcement**	Traffic Management	UTC, Congestion management, traffic reduction	2023		NCC	NCC	Funded		Planning	Reduced emissions of N02 and PM by reducing congestion on the roads	Restrain average journey times in the morning peak to a 1% increase per year	•Since June 2022, local authorities have been able to apply to the DfT for the powers to enforce moving traffic offences. Such offences include banned turns, driving in pedestrian areas, environmental weight limits, box junctions etc. • NCC was granted powers to enforce moving traffic offences in December 2024 and the first pilot sites will be the box junction at Lady Bay Bridge, West Bridgford, and the banned right turn into the ASDA off B6166, Newark. Further pilot sites are planned in 2025.	
20	**Optimisation of traffic signals**	Traffic Management	UTC, Congestion management, traffic reduction		On-going	NCC / Via EM	NCC	Funded	£1m - £10m	Implemented	Reduced vehicle emissions	Restrain average journey times in the morning peak to a 1% increase per year	SCOOT and MOVA equipped signals are relayed back to the Traffic Control Centre so that they can be altered in real time as required.	Implementation ongoing

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21	**Lane Rental Scheme**	Traffic Management	UTC, congestion management, traffic reduction	2023	2025	NCC	NCC	Not funded		Planning	Reduced emissions of N02 and PM by reducing congestion on the roads	Restrain average journey times in the morning peak to a 1% increase per year	•NCC are looking at potentially introducing a Lane Rental scheme within the county. • This would involve determining the top most congested roads in the county and then, following consultation, making an Order which will allow NCC (as the Highway Authority) to apply a levy/charge to anyone undertaking either street works (utilities) or roadworks (Council) during the peak times on these roads. • The intention of the scheme is to minimise works from taking place during the peak times, which would lead to excessive congestion (which impacts on air quality). Any income raised through the scheme can be reinvested in projects to reduce congestion/improve highways, and subsequently air quality. • The anticipated start date for a Lane Rental scheme in the county, if approved, is April 2026.	2026
22	**Promoting on the Council Webpage the Council's Electric Vehicle Charging Points Network within the Borough**	Public Information	Via the Internet	2020	On-going	BBC Parking services – Parking Manager	LA - BBC	Not Funded	Within existing resources	On-going	Reduction in $N0_2$ and PM due to raising awareness of where people can use the charge points for their electric vehicles	32 EVCP are currently promoted on BBC's website.	•The Council currently has 32 electric vehicle charging points in Beeston, Stapleford, Kimberley and Eastwood these are displayed with the postcodes for easy identification on the Council website and this is updated when necessary.	On-going 2025

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													• Four new charging points to be added in Stapleford in 2025.	
23	**To continue investigating the installation of Electric Vehicle Charging Points for staff and visitors to the Council to use**	Promoting Low Emission Transport	Other	2020	On-going	BBC Parking services – Parking Manager	Provider Funded	-	-	On-going	Reduction in NO_2 and PM by encouraging Electric Vehicle use	Number of EVCP installed for visitors to the Council to use.	• Investigation into this has been undertaken and the infrastructure and power supply has already been installed within Devonshire Avenue car park. • Provider funded opportunities are available and currently two EV providers are being reviewed via procurement framework	**Infrastructure and power supply complete** On-going
24	**Review of off-street car parking charging**	Traffic Management	Emission based parking or permit charges	2020	2023	BBC Parking services – Parking Manager	LA - BBC	Funded	<10K	Completed	Reduction in NO_2 and PM	Reduced Emissions	• On-going annually. The policy document is updated only when there is significant legislation or council policy changes •Charges will also be reviewed on an ad hoc basis. • There are no plans to introduce emissions-based charging in car parks. Since January 2024, additional charges have been introduced around the borough, to those car parks that were previously free.	On-going
25	**To review and update the Electric Vehicle Infrastructure (EVI) Strategy for the Borough of Broxtowe**	Promoting Low Emission Transport	Procuring alternative refuelling infrastructure to promote low emission vehicles, EV charging, gas fuel charging	2026	On-going	BBC Climate Change Manager	LA-BBC	Not Funded	Within existing resources	Planning	Reduced Emissions	Improving Air Quality, reduced Emissions by promoting EV charging locations	• To review the Electric Vehicle Infrastructure Strategy for the Borough of Broxtowe that was approved in 2024. This Strategy will be reviewed every two years	2026
26	**To review the Climate Change and Green Futures**	Policy Guidance and Development Control	Low Emissions Strategy	2022	2027	BBC Climate Change Manager	LA-BBC	Not Funded	Within existing resources	Implementation	Reduced Emissions	Improving Air Quality	• To review the Climate Change and Green Futures Strategy for the Borough of	2025

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	Strategy 2023-2027												Broxtowe that was approved in 2022. This Strategy is reviewed bi-annually	
27	**Real time travel information**	Public Information	Other	-	Ongoing	NCC/Via EM Ltd	NCC revenue funding	Funded	-	Implemented and on-going	Reduced Emissions	Restrain average journey times in the morning peak to a 1% increase per year	• Information conveyed by all forms of media (press, radio, website, social media etc.). • The Travelwise centre remains in operation 24hrs a day, every day.	Nottingham Travelwise website: https://www.itsnottingham.info/
28	**Bus service improvements**	Transport Planning and Infrastructure	Public transport improvements-interchanges stations and services	2019	2025	NCC / NCiC / PT operators	DfT	Funded	>£10 million	On-going	Reduced emissions of N02 and PM due to increased passenger transport patronage.	Increased bus patronage	• Delivery of the two Bus Service Improvement Plans within Nottinghamshire has progressed well, with Nottinghamshire BSIP spending £6.3 revenue and £2.9m capital to date on various measures including enhanced bus services, ticketing improvements and infrastructure improvements. 2025/26 will focus on maintaining current service levels and delivery of major bus priority schemes.	Bus service provision is provided on a commercial basis with support from NCC where justified; and reviewed periodically. Estimated cost of measure £25m
29	**Encouraging the use of emissions standards when procuring school bus contracts and supported bus services**	Promoting Low Emission Transport	Company Vehicle Procurement - Prioritising uptake of low emission vehicles		On-going	NCC / PT operators	PT operators	Funded		Ongoing	Reduced emissions of N02 and PM	Reduced emissions and ongoing take-up of cleaner vehicles	On-going take-up of LEVs	Funding details not known as its funded commercial private operators
30	**Bus stop clearways**	Traffic Management	UTC, congestion management, traffic reduction		Ongoing	NCC / Via EM	NCC	Funded	£50k - £100k	Implemented and ongoing	Reduced vehicle emissions	Manage parking to improve journey time reliability	Bus stop clearways are introduced at bus stops within the county, where parked vehicles are identified as impeding traffic flows. CCTV enforcement car introduced in 2016, second vehicle	The estimated cost provided is the annual cost of this measure.

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													purchased in 2018; and third vehicle introduced in 2019.	
31	**Bus infrastructure**	Transport Planning and Infrastructure	Public transport improvements-interchanges stations and services		Ongoing	NCCV	Integrated transport block funding	Funded	£100k - £500k	Implemented and ongoing	Reduced emissions of N02 and PM due to increased passenger transport patronage	Increased passenger transport patronage	An annual programme of bus infrastructure improvements is delivered as part of the integrated transport block programme, including the installation of new bus shelters and real time bus information, and the update/maintenance of all stops e.g. updating network maps to ensure all information is current and accurate.	The estimated cost provided is the annual cost of this measure.
32	**Bus fleet low emission vehicles**	Vehicle Fleet Efficiency	Promoting Low Emission Public Transport		On-going	NCC / NCiC / PT operators; NCT (operator)	DfT	Funded	£1m - £10m	Implemented	Reduced emissions of N02 and PM due to increased use of low emission vehicles	Reduced emissions and ongoing take-up of cleaner vehicles	• £5.3m of funding secured to support delivery of electric buses in Mansfield in 2026, with further investment planned for 2027. • £4.4m of BSIP funding secured to enable further investment in zero emission buses. • Bus operators continue to invest in zero emission buses.	
33	**Under 22s Young Persons' Ticket**	Transport Planning and Infrastructure	Other	2022/ 2023	2025	NCC/NCiC/PT operators	PT operators	Funded	-	Implemented	Reduction in N02 and PM due to increased passenger transport patronage	Increased passenger transport patronage	BSIP funding secured to launch an Under 22 young persons' ticket for use in Greater Nottingham and Nottinghamshire providing an extension of under 19s discounted travel to under 22s. **Update**: it was launched in September 2023	The Under 22s scheme was launched in September 2023 and is due to run until March 2025, at which point the scheme will be reviewed. Under 22 Scheme | Nottinghamshire County Council
34	**Marketing and promotion of passenger transport**	Promoting Travel Alternatives	Other	-	On-going	NCC/NCiC/PT operators	LA-NCC LA-NCiC	Funded	Within existing Resources	On-going	Reduction in $N0_2$ and PM as increased bus patronage	Increased passenger transport patronage	• NCC undertakes various marketing campaigns in partnership with operators and NCiC – coordinated through the Greater Enhanced Partnership.	On-going

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													• Sales and Marketing Plan continues to be delivered to help promote public transport. • Network maps produced to coincide with route/timetable changes	
35	**Sustainable Travel information for the Public**	Public Information	Via the internet	2010	On-going	BBC Climate Change Manager	LA-BBC	Not Funded	Within existing resources	On-going	Reduced Emissions of NO_2 and PM	Increased use of public transport	•The Travel Choice website provides information and advice to residents, jobseekers and businesses, on sustainable travel options within the county • School travel Toolkit (see measure **No.65**) •BBC have leaflets on safe cycling on the tram lines, bus routes, Broxtowe cycling map, Broxtowe Country and Erewash Valley routes and walking leaflets. These are all available in the Council reception. • Sustainable Travel methods are also available on the main council website.	On-going
36	**Concessionary fare schemes**	Transport Planning and Infrastructure	Other	On-going	On-going	NCC/PT operators	LA-NCC	Funded	> £10 million	On-going	Reduced emissions due to increased bus patronage.	Increased passenger transport patronage	Countywide off-peak concessionary public transport fare scheme available for the over 60s and disabled.	The estimated cost provided is the annual cost of this measure.
37	**Taxi Licensing Conditions**	Promoting Low Emission Transport	Taxi Licensing conditions	2018	On-going	BBC Licensing Team - Licensing Manager	N/A	Not Funded	N/A	On-going	Reduction in NO_2 and PM as cleaner vehicles	Recued Emissions	No vehicle older than 8 years will be licensed on first application. Petrol fuelled vehicles must be Euro 5 or above Diesel fuelled vehicles must be Euro 6	On-going
38	**To Increase the number of low emission and electric vehicles licensed as Taxis by Broxtowe**	Promoting Low Emission Transport	Taxi Licensing conditions	2020	On-going	BBC Licensing Team - Licensing Manager	N/A	Not Funded	N/A	On-going	Reduction in NO_2 and PM as cleaner vehicles	Number of LEV and Electric Vehicles licensed within the borough as Taxis	Broxtowe Borough Council currently licence 5 Electric vehicles, 44 Hybrid vehicles and 51 Euro 6 Vehicles out of the 100 Vehicles that are licensed to operate as Taxis.	On-going

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	Borough Council.												This is an increase from last year.	
39	**To Investigate the feasibility of incentives for Taxi Drivers to purchase low emission or electric vehicles**	Promoting Low Emission Transport	Taxi emission incentives	2020	2024	BBC Licensing Team - Licensing Manager	N/A	Not Funded	N/A	Planning	Reduction in NO_2 and PM as cleaner vehicles	% uptake of the incentive if implemented.	The Implementation of National Standards in November 2022 were not in relation to LEV or electric vehicles. Therefore, a project of looking at incentives for drivers of low emission vehicles needs to be looked at.	On-going
40	**To consult with Taxi Trade about Increasing the number of Low Emission and Electric vehicles licensed**	Promoting Low Emission Transport	Other	2020	2025	BBC Licensing Team - Licensing Manager	N/A	Not Funded	N/A	Planning	Reduction in NO_2 and PM as cleaner vehicles	Increase in the number of LEV and Electric Vehicles licensed within the borough as Taxis	This needs to be looked at when the results of measure 39 are known. In order to increase numbers, we need an incentive to purchase LEV and Electric vehicles .	On-going
41	**To amend the Taxi Policy as required following consultation on Increasing the number of low emission and electric vehicles licensed**	Policy Guidance and Development Control	Other policy	2020	2025	BBC Licensing Team - Licensing Manager	N/A	Not Funded	N/A	Planning	Reduction in NO_2 and PM as cleaner vehicles	Number of LEV and Electric Vehicles licensed within the borough as Taxis	The Taxi Policy will need amending once Measures 39 and 40 have been concluded	Ongoing
42	**To Replace older combination boilers and system boilers to Seasonal Efficiency of a Domestic Boiler in the UK (SEDBUK) A rated condensing boilers**	Other	Other	2020	On-going	BBC Capital Works - Capital Works Manager	LA-BBC	Funded	£10k - £50k	On-going	Reduced emissions due to more efficient boilers	Number of boilers replaced	•The replacement of the remaining less efficient units (less than 1%) is planned. The typical life cycle of a unit is 15 years. Therefore, the current stock needs to be replaced as it becomes beyond its serviceable life. This is a 15 year Rolling program	On -going
43	**To Install Air Source Heat pumps on all new builds owned by the Council (Except Section 106)**	Other	Other	2021	2024 and On-going	BBC Capital Works - Capital Works Manager	LA-BBC and Homes England	Funded	£1m/£10m	Implementation and on-going	Reduced emissions due to more efficient boilers	Increase in new builds having air Source heat pumps as a form of heating	Air source heat pumps are now installed in the Councils new build properties	On-going
44	**To investigate and consider suitable**	Other	Other	2020	2025 On-going	BBC Capital Works - Capital Works Manager	LA-BBC	In existing funds	£100k/£500k	Success of the trials for cleaner	Reduced emissions due to more	Efficiency rating of new heating	• High heat retention units were being fitted as	On-going

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	alternative replacements for the remaining electrically heated Council properties									heating technology	efficient and cleaner technologies to heat the council properties	replacements.	replacements in 2022 and this will be continuing in future years •Air source heat pumps will also be considered at suitable properties where a retro fit solution is possible.	Approx 60 properties left to replace
45	**Low Emission Vehicle Procurement**	Promoting Low emission transport	Company vehicle Procurement - prioritising uptake of low emission vehicles	2017, 2019 and 2020	2024	BBC Transport and Stores Manager	LA-BBC	Funded	£10k - £50k	On-going	Reduced Emissions of N02 and PM	Reduction in $N0_2$ and PM due to cleaner vehicle technology	• All new fleet vehicles at BBC are Euro6 emissions complaint. There are 95 fleet vehicles, and they are on a 12-year replacing rolling programme. • BBC has purchased two new Euro 6 Refuse Collection vehicle in the financial year 24/25 replacing two older vehicles. • BBC currently operate a fleet of 9 electric vans	On- going
46	**To develop a plan for future infrastructures to support growth in BBC's Electric Fleet and the domestic use of Electric Vehicles**	Vehicle Fleet Efficiency	Other	2020	2025-2026	BBC Transport and Stores Manager	LA-BBC and External grant – Grant provider not currently known	-	>£10 million	Planning	Reduction in $N0_2$ and PM due to increased use of low emission vehicles.	Reduction in $N0_2$ and PM due to cleaner vehicle technology	A review is currently being undertaken to determine the necessary infrastructure to accommodate the move to an electric fleet. This is being undertaken in partnership with Midlands Zet Zero Hub.	Prohibitive cost 2025/2026
47	**To investigate the viability of obtaining equipment and software that will record BBC Fleet Vehicle driver's behaviour, and enable a training programme to be established to**	Vehicle Fleet Efficiency	Driver training and ECO driving aids	2020	2025-2026	BBC Transport and Stores Manager	LA-BBC	Funded	Within existing resources	Planning	Reduction in $N0_2$ and PM due to improved driving efficiency.	Number of employees that have undergone driver training.	An investigation into the viability of obtaining equipment and software that will record driver behavior and enable a training programme to be established. **Update** – a Business Case for the purchase and subscription of Tachograph analysis software has been submitted for ICT review.	2025/26

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	improve efficiency												**Update –** The above business case is having to be redrafted with a new software supplier and the identified provider did not meet the security requirements demanded by the Head of ITC.	
48	**Capital Fleet Vehicle Replacement for HGV's**	Vehicle Fleet Efficiency	Other	2020	2021-2024	BBC Transport and Stores Manager	LA-BBC	Funded	£500k - £1 Million	On-going	Reduction in NO_2 and PM due to replacement of older HGV's.	Number of replacement HGV's	• The Capital Vehicle Fleet replacement programme for HGV's (Refuse Freighters 26 Tonnes) identified for replacement will be replaced with Euro standard engines (Euro 6 onwards). • £750k per annum • Before purchasing, consideration will be given based on practicality and economics of the adoption of new technologies that have come to market. This includes Electric and Hydrogen Propulsion methods.	On-going
49	**Vehicle Emissions Testing**	Vehicle Fleet Efficiency	Testing Vehicle Emissions	On-going	On-going	BBC Transport and Stores Manager	LA - BBC	Not Funded	Within existing resources	On-going	Reduction in NO_2 and PM as regular serviced and maintained vehicles to ensure they are operating efficiently.	Reduced emissions	•All BBC Fleet vehicles are annually emission tested in house prior to MOT Emission testing. • BBC also undertakes additional emissions tests on all fleet vehicles if any new fuel or engine components have been changed. This is to ensure vehicle emission compliance. • **Update:** All BBCs commercial fleet of vehicles (95) are now being fuelled with HVO instead of Diesel.	On-going On-going
50	**To provide all new allotment tenants within the borough, a Tenancy agreement**	Public Information	Other	2012	On-going	BBC Parks and Open Spaces – Environmental Development Officer	LA-BBC	Not Funded	N/A	On-going	Reduction in Particulates due to reduction of bonfires on site	Reduction in bonfires from allotments within the borough.	All new allotment tenants within the borough are provided with a tenancy agreement which includes the following	On-going

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	regarding bonfires.												information: bonfires should only be used on very rare occasions, and due consideration for other allotment holders and neighbouring properties must be used at all times. They must only be in the period 1st October to 31st March and only used to burn non compostable garden waste that is produced on the allotment.	
51	**To regularly communicate with all allotment providers in the borough to discourage the use of bonfires to dispose of garden waste**	Public Information	Other	2023	2024	BBC Parks and Open Spaces – Environmental Development Officer	LA-BBC	Not Funded	N/A	Planning	Reduction in Particulates due to reduction of bonfires on site	Reduction in bonfires from allotments within the borough.	In January 2026 the allotment newsletter will include a section about bonfires and discouraging them, and using alternative methods to dispose of garden waste	2026
52	**To investigate the feasibility of increased provision for cycle parking in the Borough**	Alternatives to private vehicle use	Other	2022	2025	BBC Head of Economic Development and Regeneration.	LA - BBC	Not yet identified	Not yet calculated	Planning	Reduced Emissions of NO_2 and PM	No of cycle parking spaces in the borough	A feasibility study has not been undertaken yet. However, several projects were undertaken in 2023 to increase cycling provision in the Borough. These projects are discussed in this Table as separate measures **Update:** A new cycle hub was installed in Toll bar square, Kimberley in 2024.	Three Sites and routes being investigated in 2025
53	**To investigate the provision of an E bike Scheme within the borough**	Alternatives to private vehicle use	Other	2024	2026	BBC Head of Economic Development and Regeneration.	LA-BBC, UKSPF and private sector	Funded	<£10k	Planning	Reduced Emissions of NO_2 and PM	Number of Kilometres cycled	To investigate the provision of an E bike Scheme within the borough. On-going discussion with Lime bikes. Implementation expected early 2025	Update will be provided in the 2026 ASR
54	**Improving the cycle network in Stapleford**	Transport Planning and Infrastructure	Cycle Network	2022	2026	BBC Economic Development - Regeneration Projects Manager	Stapleford Towns Deal	Funded	£1m-£10m	Planning	Reduced Emissions of NO_2 and PM	Reduced emissions due to increase in cycling	Funds have been sourced through the Stapleford Towns Deal to improve and encourage cycling within Stapleford by improving the cycling infrastructure. Project	Delays in approval and External stakeholder engagement may cause issues (Highway Authority), Rising costs for required LTN/120 Standards, changes and adaptations to cycle path routes have delayed projects.

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													Adjustment request was approved by DLUHC approval for amended scheme to progress, further work continues to meet the grant fund timeline for the amended	
55	**To develop and Improve the Cycle Network from Newdigate Street, Kimberley to Low Wood Road, Nuthall**	Transport Planning and Infrastructure	Cycle Network	2025	2026	BBC Kimberley Means Business Manager	Kimberley Means Business project	Funded	£500k - £1m	Planning	Reduced Emissions of NO_2 and PM	Reduced emissions due to increase in cycling	• To develop and improve cycle routes between Kimberley School on Newdigate Street and Low Wood Road.as part of the Kimberley Means Business project. • To Improve the route, the lighting and surfaces of other paths used by walkers and cyclists.	Late 2025 to 2026 An update will be provided in the 2026 ASR
56	**Cycle Repair Workshops**	Alternatives to Private Vehicle use	Other	2022	2023	BBC Economic Development - Regeneration Projects Manager/ RideWise	Stapleford Towns Deal/ RideWise	Funded	£10-£50k	Implemented	Reduced Emissions of NO_2 and PM	Reduced emissions due to increase in cycling	RideWise continue to support the Cycle Hub, which has been extended for another year to Mar 26. They have supported 1366 people to date with bike repairs.	Future grant funds to continue to the service past the Stapleford Town Deal funding allocation.
57	**Cycling network and Infrastructure**	Transport Planning and Infrastructure	Cycle network	2018/19	On-going	NCC / Via EM	LGF/ DfT / developer contributions	Not Funded	Various	Planning	Reduced Emissions of N02 and PM	Increased cycling trips	• Cycling infrastructure improvements are delivered as part of NCC's annual integrated transport programme. However, costs are extremely high, so NCC requires external funding to deliver them. NCC submits bids to Active Travel England for funding and districts secure developer contributions for improvements as part of new developments. The D2N2 Local Cycling and Walking Infrastructure Plan (LCWIP) will be used to help identify and prioritise future	• The D2N2 LCWIP will be used to help identify potential future cycle improvement schemes. • Any future cycle improvement schemes will be subject to funding availability, feasibility consultation, and approvals. • A potential barrier to such projects is the availability of funding, feasibility and public acceptable of proposals.

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													improvements should DfT funding be made available for their delivery. Other small-scale cycling improvements are developed and delivered as part of the annual integrated transport programme and through developer funded improvements	
58	**Cycling networks as part of Active Travel Funding (ATF) Tranche 4**	Transport Planning and Infrastructure	Cycle network	2023	On-going	NCC	Active Travel Fund (ATF)	Funded	£1 million - £10 million	On-going	Reduced Emissions of N02 and PM	Increased cycling trips	• In May 2023, the government announced that NCC were successful in securing £1.1m from Tranche 4 of the Active Travel Fund (ATF), for the development of a new walking and cycling facility along Baulk Lane, Stapleford. The scheme is subject to feasibility, consultation, and County Council Cabinet Member approval.	
59	**Cycling network and infrastructure as part of Towns Fund**	Transport Planning and Infrastructure	Cycle network	2015	On-going	BBC/NCC / Via EM	Towns Fund	Funded	£1 million - £10 million	On-going	Reduced Emissions of N02 and PM	Increased cycling trips	• Cycle hub installed at Beeston Train Station in 2015 to integrate with bus/rail services. • BBC's Town Fund includes potential cycle infrastructure (funding amount to be determined by Board and scheme proposals subject to feasibility, consultation, and County Council Cabinet Member approval).	A potential barrier to such projects is lack of future revenue funding. The Towns Fund funded proposals are still subject to feasibility, consultation, and County Council Cabinet approval.
60	**Cycle training**	Promoting Travel Alternatives	Promotion of cycling	Circa 1970s	Ongoing	NCC	DfT funding/PH funding	Funded	Various	Implemented and On-going	Reduced Emissions of N02 and PM	Increased cycling trips	• Across the county, 12,618 people received cycle training during 2024/25 and in Broxtowe specifically, training was delivered to 2,188 people.	Implementation is ongoing.

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61	**Marketing of cycling**	Promoting Travel Alternatives	Promotion of cycling	2010 and 2017	On-going	NCC	NCC	Not Funded	within existing resources	Implemented and on-going	Reduced Emissions of N02 and PM due to increased cycling uptake	Increased cycling trips	• Marketing of cycling is undertaken in a variety of formats for both commute and leisure trips. Various NCC campaigns have been undertaken including 'cycling week', 'Notts Routes and Rides' and cycle maps. • NCC's website and Travel Choice webpages provide information on cycling across the county (for residents and businesses	Travel Choice website: Nottinghamshire County Council Cycle
62	**Marketing of walking**	Promoting Travel Alternatives	Promotion of walking	-	On-going	NCC	NCC	Funded	Within existing resources	Implemented and on-going	Reduced Emissions of N02 and PM due to more people walking	Increased walking trips	• General promotion (e.g. website and literature) ongoing. • NCC's website and Travel Choice webpages provide information on alternatives to using private vehicles, including cycle maps, leisure 'Routes and Rides' and the Rights of Way network	Travel Choice website: Nottinghamshire County Council Walk
63	**Pedestrian infrastructure improvements**	Transport Planning and Infrastructure	Other	2020	On-going	NCC / Borough and District Councils	NCC and various other sources of funding e.g. S38, S278 and S106	Funded	£100k to £500k	On-going	Reduction in NO_2 and PM emissions as more people are walking	Increased walking trips	• Pedestrian improvements (e.g. pedestrian crossing, dropped kerbs, footways) are developed and delivered as part of NCC's annual integrated transport programme. • In addition to the integrated transport block funding, improvements are also delivered using funding secured through the planning process (e.g. S38, S106, S278).	• NCC's annual integrated transport programme is published on the Council's website Decision Details: Highways Capital and Revenue Programmes Update • Schemes identified are subject to feasibility and availability of funding. • A potential barrier to such schemes is the lack of future funding.
64	**Encouraging the use of emissions**	Promoting Low	Company Vehicle Procurement - Prioritising	-	Ongoing	NCC/PT operators	PT operators	Funded	-	On-going	Reduced Emissions	Reduced Emissions and on-going	• On-going take-up of LEV	Funding details not known as its funded commercial private operators

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	standards when procuring school bus contracts and supported bus services	Emission Transport	uptake of low emission vehicles								of N02 and PM	take-up of cleaner vehicles		
65	**School travel plans**	Promoting Travel Alternatives	School Travel	2000	On-going	NCC	NCC	Not Funded	£10k - £50k	Completed	Reduced Emissions of N02 and PM if alternative methods of sustainable travel are used	Restrain average journey times in the morning peak to a 1% increase per year	• Following a trial with four pilot schools in 2019/20, the online school travel toolkit was rolled out to all County schools during the 2020/21 academic year. • The Nottinghamshire School Travel Toolkit provides school children, parents and staff with information and advice on improving travel to and from Nottinghamshire's schools.	Costs detailed are for the School Travel Toolkit only. There currently is not any funding available for delivering travel planning to individual schools. Link to School travel toolkit: https://www.nottinghamshire.gov.uk/education/travel-to-schools/school-travel-toolkit
66	**Web based journey planners**	Public Information	other	2019	On-going	NCC	NCC	Funded	within existing resources	Implemented	Reduction in $N0_2$ and PM due to increase in sustainable travel	Increased walking/cycling/ passenger transport trips	• Nottinghamshire is part of the national, multi-modal Traveline journey planner. • Web links to the Traveline site are publicised and available from NCC's website. • New Live Travel Suite to be launched in May 2025 to replace Traveline offering enhanced features for journey planning.	Journey planner on NCC's website: Plan a journey using public transport | Nottinghamshire County Council Web based tools are also included on NCC's Travel Choice website: Nottinghamshire County Council Journey planner
67	**Personalised travel planning**	Promoting Travel Alternatives	Personalised Travel Planning	2010	On-going	NCC / AECOM	DfT Access Fund	Funded	£50k - £100k	Completed	Reduction in $N0_2$ and PM due to increase in sustainable travel	Restrain average journey times in the morning peak to a 1% increase per year	• NCC have delivered Personalised Travel Planning (PTP) to residents, jobseekers, workplaces and schools across various parts of the county, over a number of years: including Beeston, West Bridgford, Newark, Ashfield, Mansfield and Worksop • The 2019 DfT Access Fund funded PTP project targeted 4,976 households	

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													in Daybrook: with 1,188 households opting to take part in the project and receiving travel advice. • The Capability Fund funded PTP project has delivered to over 550 households and 400 employees in Bassetlaw and Ashfield to date • Most recently: - The 2022/23 Capbility Fund funded PTP project targeted 1,706 households in Sutton-in-Ashfield and West Bridgford; with 343 households engaged, 7 community engagement events, Dr Bike maintance sessions, adult cycle training taken up by 81 residents and 4 business grants (3 NHS Hospitals/surgeries and a private company). • - The 2023/24 Capability Extension Fund funded PTP project targeted 4,680 households in West Bridgford, with 1,029 households engaged. • - The 2024 Capabiltiy Fund funded PTP project is to be delivered in Stapleford, during Summer 2025, aiming to target 3,500 households.	Future PTP will be delivered should revenue funding sources be identified and secured for its delivery. Future capbility funding will go directly to EMCCA to distribute to LAs
68	**Car Lease Scheme for BBC employees**	Promoting low emission transport	other	2021	On-going	BBC Human Resources - Human Resources Manager	LA-BBC	Not Funded	-	Implementation	Reduction in $N0_2$ and PM	Number of employees leasing ULEV	• BBC has introduced a Car Lease Scheme in 2021 for employees, to encourage and	Increase car costs also may limit affordability.

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													uptake in ULEV to reduce emissions. This also includes electric vehicles. • 5 employees have made use of the scheme, utilising EV/ULEV cars. 2 employees have returned vehicles, and 3 vehicles are currently being leased. One of those employees is on their second vehicle.	
69	**Encouraging the use of Hybrid or Electric vehicles for BBC employees**	Promoting Low Emission Transport	Other	2020	On-going	BBC Payroll and Job Evaluation Manager	LA-BBC	Funded	Within existing resources	Implementation	Reduction in $N0_2$ and PM	Number of employees using hybrid or electric vehicles	•To encourage employees of BBC to purchase hybrid vehicles and electric vehicles for their personal and business use. •Twelve employees used a personal Electric vehicle and five used a ULEV in 2024.	On –going
70	**Investigate the feasibility of a Council staff car sharing**	Alternatives to Private Vehicle Use	Car Clubs	2020	On-going	BBC Human Resources - Human Resources Manager	N/A	Not Funded	N/A	Planning	Reduction in $N0_2$ and PM	No of staff car sharing	Due to Covid-19 being prevalent and it is transmissible in confined spaces, this measure has been put on hold temporarily. However, staff in the future will be encouraged to travel together. An update will be provided in the next ASR. Car clubs are going be explored in 2025/26 An understanding of the infrastructure and availability/feasibility will be key to determining success.	No progress
71	**Promoting travel choices - Consideration of car club into the county**	Alternatives to private vehicle use	Car Clubs	2023		NCC	NCC	Not Funded		On-going	Reduced emissions of N02 and PM	Restrain average journey times in the morning peak to a 1% increase per year. A reduction in staff business emissions	• NCiC scheme introduced in 2014, with the provider reviewed in 2018. Expansion of scheme into county dependent on its success, which is still unclear. • Work has been undertaken to look	Dependent on the determination of business case and commercial operator coming forward. Barriers include financial risk, organisational culture (i.e. using personal cars less) and specific service needs.

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												and cost, through both a car club and a wider review of staff travel habits.	at the feasibility of a partnership with a Car Club operator in the county, for both residents and internal use (i.e. staff travel). The work will feed into a wider fleet review and review of staff business travel, with a few more aspects to be expanded upon. Funding for implementation to be determined.	
72	**Cycle to work Scheme**	Promoting Travel Alternatives	Promotion of cycling	2009	On-going	BBC Payroll and Job Evaluation Manager	N/A	Not Funded	Within existing resources	On-going	Reduction in NO_2 and PM	No of bikes purchased through scheme	•Cycle to work Scheme – to assist and give tax relief on bike purchases for employees of BBC. •Five employees purchased a bike through this scheme in 2024. Since the scheme started 194 employees have purchased bikes through the scheme. Mileage when using a bicycle is now paid at a higher rate of 45p per mile.	On-going
73	**Flexible working arrangements**	Promoting Travel Alternatives	Encourage/Facilitate Home Working	2012	On-going	NCC and BBC Human Resources - Human Resources Manager	N/A	Not Funded	N/A	On-going	Reduction in NO_2 and PM due to employees not commuting	Restrain average journey times in the morning peak to a 1% increase per year	•NCC operates flexible working arrangements for all its staff. •BBC New Ways of Working was introduced in 2019, which allows and encourages employees to work from home when practical to do so.	On-going Agile working at BBC continues to benefit the organisation and give employees flexibility to effectively discharge their duties and minimize unnecessary travel.
74	**To reschedule the dry recycling waste rounds to reduce fuel consumption and improve efficiency**	Vehicle Fleet Efficiency	Other	2020	2025	BBC Environment – Head of Environment	N/A	Not Funded	N/A	Planning	Reduction in NO_2 and PM due to efficient routes.	Reduced emissions	The round reschedule is currently in progress. Completion is anticipated in September 2025.	Once the main review has been undertaken, the route optimisation software that has been purchased will help to ensure that the on-going refuse rounds are working as efficiently as possible.
75	**To reschedule the green waste rounds to reduce fuel consumption**	Vehicle Fleet Efficiency	Other	2020	On-going	BBC Environment – Head of Environment	N/A	Not Funded	N/A	Planning	Reduction in NO_2 and PM due to efficient routes	Reduced emissions	The garden waste rounds are dictated by the number of subscribers to the service, and this is reviewed on an annual basis.	Once the main review has been undertaken, the route optimisation software that has been purchased will help to ensure that the on-going refuse rounds are working as efficiently as possible.

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	and improve efficiency												However, the round reschedules, which is currently in progress will help support this.	
76	**Development of ITSO public transport smartcard ticketing**	Transport Planning and Infrastructure	Public transport improvements-interchanges stations and services	2014	2024	NCC/NCiC/PT operators	DfT	Funded	-	Completed	Reduction in NO_2 and PM due to increased passenger transport patronage	Increased passenger transport patronage	• Integrated ticketing strategy developed in 2014/15. A new smartcard platform was introduced in 2014 and the Robin Hood card scheme was introduced in 2015. All the major bus operators have now introduced contactless payments for their own ticketing products alongside the Robin hood card and this was completed in around March 2020. • The first multi-operator contactless ticketing system in the UK outside London was launched in the Nottingham area in May 2022. Public transport users can now pay a single daily capped fare across the majority of the city's buses and trams using their chosen contactless payment method.	The Nottinghamshire Enhanced Partnership has now delivered and launched a Multi Operator ticketing (MOT) in Newark and looking to launch a Mansfield MOT in September 2025.
77	**To undertake a data quality review of boiler information held for Council Properties to determine whether they have been included in the replacement programme.**	Other	Other	2020	2024	BBC Capital Works - Capital Works Manager	LA-BBC	Funded	£10k - £50k	Complete	Reduced emissions due to more efficient boilers	Identifying the number of boilers that need replacing	• BBC will be undertaking a data quality review on boiler information held for the properties in question as we believe these may have already been incorporated in replacement programmes - this was completed in 2024.	**Complete**
78	**To investigate and consider new heating technologies that are more efficient, effective and**	Other	Other	2020	2021 and ongoing	BBC Capital Works - Capital Works Manager	Better Care fund	Funded	£50k - £100k	Complete	Reduced emissions due to more efficient boilers	Success of the trials for cleaner heating technology	•Currently reviewing the development of hydrogen technology for boilers. Studies show that the emissions are reduced greatly.	**Complete** - The trail was completed and included in future specifications to install air source heat pumps instead of gas boilers if possible

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	produce lower emissions				2023								Subject to existing networks and Government. •A trial was undertaken for fitting air source heat pumps in 7 new builds in 2021 and in 5 new builds in 2022.	Air source heat pumps are now installed in the Councils new build properties (except Section 106)
79	**Investigate ways to decarbonise BBC's fleet through alternative fuels**	Vehicle Fleet Efficiency	Fleet efficiency and recognition schemes	2021	2024	BBC Environment - Head of Environment	LA-BBC	Not Funded	£100k - £500k	Complete	Reduction in $N0_2$ and PM	Reduced emissions	• A report was submitted to Cabinet in July 2023, which approved the transition to HVO. The transition took place in April 2024.	**Complete** – all refuse vehicles and fleet vehicles (where appropriate) are HVO
80	**Installation of 7kW electric vehicle (EV) chargepoints at BBC Kimberley Depot for Public Sector Fleet Vehicles**	Vehicle Fleet Efficiency	Other	2023	2025	BBC Transport and Stores Manager	Future Transport Zones (FTZ) funding	Funded	£10k - 50k	Completed	Reduced Emissions of N02 and PM	Reduction in N02 and PM due to cleaner vehicle technology	• Four new 7kW electric vehicle (EV) charge points were installed at Kimberley Depot (increasing the number to six.) in 2024 • Nottingham City Council was awarded a grant as part of the Future Transport Zones (FTZ) funding, to develop and operate an EV charging network across the Nottingham, Nottinghamshire, Derby and Derbyshire (D2N2) region. The charge points when installed will form part of a network of public sector organisations who have agreed to share the EV chargepoints which will enable the delivery of collective efficiencies in EV operations across the region. • These chargepoints are for the use of any Council operated fleet across the region. **BBC's financial contribution for these was: £15,796**	**Complete**
81	**To write an Electric Vehicle Infrastructure**	Promoting Low Emission Transport	Procuring alternative refuelling infrastructure to	2023	2024	BBC Climate Change Manager	LA-BBC	Not Funded	Within existing resources	Completed	Reduced Emissions	Improving Air Quality, reduced Emissions by	The Strategy is to facilitate access to a reliable Electric Vehicle Infrastructure	**Complete - -** Adopted in July 2024.

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	(EVI) Strategy for the Borough of Broxtowe		promote low emission vehicles, EV charging, gas fuel charging									promoting EV charging locations	(EVI) for residents, businesses and visitors, which will help to support the decarbonisation of transport and travel within the Borough. • The Management Strategy for the expansion of EVI across Broxtowe Borough is going to Cabinet in July 2024. • **UPDATE** – This was approved in July 2024	
82	**To revoke the current Smoke Control Orders and introduce a new single Smoke Control Order which will be supported the Smoke Control Order Enforcement Policy**	Policy Guidance and Development Control	Other Policy	2023	2024	BBC Public Protection - Senior Environmental Health Officer	Defra	Funded	£10k - £50k	Completed	Reduction in Particulates	% of people not complying with the Enforcement Policy	Broxtowe Borough Council has also formally adopted a Smoke Control Order Enforcement Policy in October 2023 to support enforcement of its Order and enable improved future regulation of the issue. Public consultation will be undertaken in 2024 about Revoking the Previous smoke control Orders and to introducing a new Smoke Control order (Minus the moored vessels) The Council have therefore made a Smoke Control Orders Revocation Order, and this will be consulted on and subject to Secretary of State approval, be brought into effect replacing all current smoke control orders.	**Complete -** The Order was sealed by BBC and approved by Defra in late 2024.
83	**To Undertake phase two of the public consultation on Smoke Control Areas to Revoke the Previous Smoke Control Orders and to introduce the new Smoke**	Public Information	Other	2022	2024	BBC Public Protection - Senior Environmental Health Officer	Defra	Funded	<£10k	Completed	Reduction in Particulates	% of people that responded to the public Consultation	To undertake public consultation on Smoke Control Areas. Revoking the Previous smoke control Orders and to introducing the new Smoke Control order (Minus the moored vessels) This was undertaken in 2024.	**Complete**

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	Control order (minus the moored Vessels)													
84	**Undertaken Phase 1 public consultation on Smoke Control Areas introducing the new Smoke Control order including Moored Vessels**	Public Information	Other	2022	2023	BBC Public Protection - Senior Environmental Health Officer	Defra	Funded	<£10k	Completed	Reduction in Particulates	% of people that responded to the public Consultation	To undertake public consultation on Smoke Control Areas introducing the new Smoke Control order. This was undertaken in 2023	**Complete**
85	**To write a Smoke Control Order Enforcement Policy and to get BBC to formally adopt it.**	Policy guidance and Development Control	Other Policy	2022	2023	BBC Public Protection - Senior Environmental Health Officer	LA-BBC	Funded	Within existing resources	Completed	Reduction in Particulates	Improving Air Quality by taking action to reduce Emissions	• To write a Smoke Control Order Enforcement Policy and to get BBC to formally adopt it**.** • Broxtowe Borough Council has also formally adopted a Smoke Control Order Enforcement Policy in October 2023 to support enforcement of its Order and enable improved future regulation of the issue.	**Complete**
86	**Investigation into whether it is feasible for free parking in the borough car parks for Electric and Hybrid vehicles**	Traffic Management	Emission based parking or permit charges	2020	2021 2023	BBC Parking services – Parking Manager	LA - BBC	Funded	Currently unknown	Completed	Reduction in NO_2 and PM by encouraging ULEV to utilise free parking	% Usage of spaces for Electric and Hybrid vehicles if this measure is introduced	•There are currently 28 x 7KW Electric Vehicle spaces, an x 2 rapid Electric Vehicle charging spaces, totalling 30 spaces. • To be explored as part of the new Electric Vehicle strategy. It is currently not free to park and this would need consideration by members Any free provision would have to be managed by limiting time, otherwise it would reduce the availability of spaces for Electric Vehicles **UPDATE:** BBC's Committee reviewed the report in October 2023 and voted	**Complete.**

Measure No.	Measure	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
													against free parking in the borough for Electric and hybrid vehicles.	
87	**To take on the provision of the cycle store at Beeston's Railway Station**	Alternatives to private vehicle use	Other	2022	2024	BBC Head of Asset Management	LA-BBC	Funded	<£10k	Completed	Reduced Emissions of NO_2 and PM	Number of bikes using the cycle store	Due to the risk of closure, BBC have taken over the provision of the cycle store at Beeston Railway station, to ensure that it is still available for the public to use.	**Complete**
88	**To install a cycle track on the Ilkeston Road Recreational Ground in Stapleford**	Promoting travel Alternatives	Promotion of Cycling	2022	2023	BBC Project Manager, Capital Works	Stapleford Towns Deal	Funded	£100k-£500k	Completed	Reduced Emissions of NO_2 and PM	Reduced emissions due to increase in cycling	Funds have been sourced through the Stapleford Towns Deal to improve and encourage cycling within Stapleford. A new cycle track was installed on the Ilkeston Road Recreational Ground in Stapleford in Works completed in March 2023	**Complete**
89	**To install a Cycling proficiency track to assist children/adults when learning to ride bikes**	Promoting travel Alternatives	Promotion of Cycling	2022	2023	BBC Project Manager, Capital Works	Stapleford Towns Deal	Funded	£100k-£500k	Completed	Reduced Emissions of NO_2 and PM	Reduced emissions due to increase in cycling	Funds have been sourced through the Stapleford Towns Deal to encourage cycling within Stapleford. A new cycle proficiency track was installed on the Ilkeston Road Recreational Ground in Stapleford in Works completed in March 2023	**Complete**
90	**To install bicycle parking stands at the Ilkeston Road Recreational Ground in Stapleford**	Promoting travel Alternatives	Promotion of Cycling	2022	2023	BBC Project Manager, Capital Works	Stapleford Towns Deal	Funded	£10k-£50k	Completed	Reduced Emissions of NO_2 and PM	Reduced emissions due to increase in cycling	Funds have been sourced through the Stapleford Towns Deal to encourage cycling within Stapleford. Nine new bicycle parking stands was installed on the Ilkeston Road Recreational Ground in Stapleford in Works completed in March 2023	**Complete**
91	**To investigate the feasibility of BBC employees having staff discounts with NET when using their trams**	Alternatives to private Vehicles use	Other	2022	2023	BBC Human Resources - Human Resources Manager	LA-BBC	Not Funded	-	Completed	Reduction in NO_2 and PM due to increase in sustainable travel	Restrain average journey times in the morning peak to a 1% increase per year	To investigate the feasibility of BBC employees having staff discounts with NET when using their trams. Employees were surveyed to express an interest to determine feasibility of progressing discussions.	

Measure No.	Measure	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
													UPDATE: Following discussions with NET in 2022, the employer must buy the tickets in advance – which makes feasibility difficult. Employees were asked to express an interest in potential tram discounts, but the interest was minimal.	**Complete**
92	**Car sharing scheme**	Alternatives to private vehicle use	Car and lift sharing schemes	Early 2000s	2023	NCC	Local Authority	Funded	<£10k annually	Completed	Reduction in NO_2 and PM	Restrain average journey times in the morning peak to a 1% increase per year	• Covid-19 pandemic has impacted on people's travel to work patterns/behaviours, which has impacted significantly on car sharing demand. • A review of the car sharing scheme found 3,250 members were registered, but not active. Activity and use of the scheme has been minimal for a number of years and consequently funding could not be justified and hence the licence has not been renewed.	**Complete** Funding could not be justified and hence licence has not been renewed.
93	**Development of Local Cycling and Walking Infrastructure Plan (LCWIP)**	Transport Planning and Infrastructure	Cycle network	2019	2023	NCC/NCiC/DCC/DCiC/borough and district councils/Sustrans/other stakeholders	DfT funding	Funded	Within existing resources	Completed	Reduced Emissions of N02 and PM	Increased levels of cycling	• A D2N2 Local Cycling and Walking Infrastructure Plan (LCWIP) has been developed. • Data collected; three stakeholder events held to date, and further public engagement on the D2N2 LCWIP took place between December 2022 and March 2023. • The D2N2 LCWIP will become the responsibility of the East Midlands Combine County Authority	Future countywide cycling infrastructure priorities will be identified through technical analysis undertaken as part of the LCWIP development (which along with other priorities, takes into consideration air quality) and will be subject to feasibility, consultation, and County Council Cabinet Member approval. The D2N2 LCWIP public engagement focused on cycle corridors only, and not specific schemes. Any future cycle improvement schemes will be subject to funding availability, feasibility consultation, and approvals.

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													(EMCCA) and will be reviewed and continue to evolve and develop over time.	
94	**Electric Vehicle Fleet Procurement for small vans below 2 tonnes**	Vehicle Fleet Efficiency	Other	2019	2023	BBC Transport and Stores Manager	LA-BBC	Funded	£100k-£500k	Completed	Reduced Emissions of N02 and PM	Reduction in $N0_2$ and PM due to cleaner vehicle technology and the procurement of two electric fleet vehicles.	•The Council currently has a fleet of 9 small vans (below 2 Tonnes). Two of these vehicles have been replaced with electric vehicles at a cost of £45k. •From 2021 to 2023 all 9 vehicles (small vans) have now been replaced with Electric Vehicles.	**Complete**
95	**Encouragement of low-emission public transport fleets**	Vehicle Fleet Efficiency	Vehicle Retrofitting programmes	2018	2022	NCC/Operators	NCC/OLEV - Clean Bus Technology Fund	Partially Funded	£500k-£1Million	Completed	Reduction in $N0_2$ and PM due to increased use of low emission vehicles.	Reduced Emissions and On-going take-up of cleaner vehicles	• NCC has invested £0.94m from the Clean Bus Technology Fund in Feb 2018 to retrofit older buses. This is in addition to operator investment in new Euro VI standard buses on some routes • Trentbarton invested in Euro VI vehicles for indigo and Rainbow 1 in 2020	**Complete**
96	**Review of on-streetcar parking in and around the AQMA**	Traffic Management	Workplace Parking Levy, Parking Enforcement on highway	-	2022	NCC	LA-NCC	Funded	-	Completed	Restrain average journey times in the morning peak to a 1% increase per year	Reduced emissions by reducing congestion on the roads in and around the AQMA	• Introduction of junction protection and targeted roadside parking restrictions (including bus stop clearways) along feeder corridors into the AQMA to help traffic flows/journey times. • Parking restrictions already in place, no additional side-road/off-line locations currently identified as requiring restrictions to aid traffic flow; but annual programmes of such schemes are developed should	**Complete** **Complete**

Measure No.	Measure	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
													any be required in the future	
97	**To raise awareness of anti-idling legislation with local bus companies and Taxi's that operate within the borough**	Vehicle Fleet Efficiency	Fleet efficiency and recognition schemes	2020	2021 2022	BBC Public Protection – Environmental Health Officer	N/A	Not Funded	N/A	Completed	Reduced Emissions from raising awareness	Improving Air Quality, reduced Emissions and Raising awareness	All local bus companies that operate within the borough were notified of anti-idling legislation and the associated health affects in 2021. All taxis that operate within the borough were notified of anti-idling legislation and the associated health affects via a leaflet in 2022	**Complete** **Complete**
98	**Increase the number of Electric Vehicle Charging Points in the Borough Car Parks.**	Transport Planning and Infrastructure	Other	2020	2021	BBC Parking services – Parking Manager	BP charge master	Funded	70K for 14 x 7kw units and £90K for 2 x 50kw units	Completed	Reduction in NO_2 and PM due to increased use of electric vehicles.	% Usage of EVCP	•This is undertaken in association with BP chargemaster, who fund the capital and revenue for number of years BBC lose income by dedicating spaces solely for Electric Vehicle use. . 2 x rapid fast charges were installed at Victoria Streetcar park Stapleford in 2021, BBC has dedicated 4 spaces for Electric Vehicle use.	**Complete**
99	**To Investigate providing all allotments within the borough with green waste recycling collections**	Other	Other	2020	2021	BBC Environment - Head of Environment	LA-BBC	Not Funded	Within existing resources	Completed	Reduction in Particulates due to reduction of bonfires on site	Reduction in bonfires from allotments within the borough.	• Multi team meeting taken place to discuss the feasibility of this. Several factors need resolving to determine whether this is a viable option. • One allotment holders' group has been written too, in order to ascertain the extent of the waste produced. • Update: The investigation determined that providing all allotments with a garden waste collection was not feasible.	**Complete**

Measure No.	Measure	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
100	**To consult all tenants on one allotment site in the borough about a total ban on bonfires on allotment sites as a means of disposing of green waste**	Public Information	Other	2020	2021	BBC Parks and Open Spaces – Environmental Development Officer	LA-BBC	Not Funded	N/A	Complete	Reduction in Particulates due to reduction of bonfires on site	Reduction in bonfires from allotments within the borough.	A questionnaire was sent to all allotment holders at one allotment site re waste. 118 questionnaires were sent, 57 were returned. 14 supported a ban, 41 said No, 2 didn't answer. 54 of the responses said that they do compost their green waste.	**Complete**
101	**Installation of new cycle stands in the Borough**	Alternatives to private vehicle use	Other	2020	2021	BBC Head of Asset Management	LA - BBC	Not Funded	Within existing resources	Completed	Reduced Emissions of N02 and PM	No of cycle parking spaces in the borough	• New cycle stands were installed at Beeston Train station and in Eastwood and Beeston Town Centres. Improved stands Kimberley Leisure Centre and Council Offices.	**Complete**
102	**To have Air Quality as a priority in the Nottinghamshire Joint Health and Wellbeing Strategy and the Nottinghamshire ICS Green Plan [led by the NHS].**	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2021	2021	NCC and NHS	N/A	Funded	N/A	Completed	Reduced Emissions from raising awareness	Raising awareness and reduced emissions	Air Quality is now a priority in the 2022 - 2026 Nottinghamshire Joint Health and Wellbeing Strategy and the Nottinghamshire ICS Green Plan [led by the NHS].	**Complete**
103	**To get the Nottinghamshire Air Quality Strategy endorsed by portfolio holders**	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2020	2020	BBC Public Protection – Environmental Health Officer	N/A	Not Funded	N/A	Completed	Reduced Emissions from raising awareness	Improving Air Quality, reduced Emissions and Raising awareness	•The NAQS was endorsed by portfolio holders in 2020.	**Complete**
104	**Joint Strategic Needs Assessment**	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2017	2020	NCC/NCiC/Borough and District councils	LA	Funded	N/A	Completed	Reduced Emissions from raising awareness	Raising awareness and reduced emissions	• Air Quality is now a chapter in the Joint Strategic Needs Assessment and part of the health and wellbeing Board considerations. • Reviewed and updated in 2020.	**Complete**
105	**To contribute to Nottinghamshire Air Quality Strategy (NAQS)**	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2018	2020	NCC/NCiC/ Borough and District councils	N/A	Not Funded	N/A	Completed	Reduced Emissions from raising awareness	Improving Air Quality, reduced Emissions and Raising awareness	•Strategy reviewed and rewritten; and the draft was approved at the Nottinghamshire County and City Health and Wellbeing Board in 2019. • The NAQS has been endorsed by	**Complete**

Measure No.	Measure	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
													portfolio holders and its published online	**Complete**
106	**Nottingham Go-Ultra Low programme - promoting uptake of LEVs**	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	2016	2020	NCiC and NCC	OLEV funding	Funded	£1 Million-£10 Million	Completed	Reduction in NO_2 and PM due to increased use of low emission vehicles.	On-going take-up of cleaner vehicles	• £6.1m of funding was secured for 2016-2020 through the Go Ultra Low (GUL) programme. • 123 locations in the county have been investigated for the potential provision of EV charge points as part of GUL project, with total of 68 chargers installed across 22 sites in Nottinghamshire between 2019-20. • In Broxtowe, 24 sites were investigated; of which 5 were feasible; providing 1 rapid, 19 fast and 1 slow charge points within car parks in four towns within the borough (Beeston, Eastwood, Kimberley and Stapleford). • Promotion events were held for public, businesses and fleet operators including loans of LEVs for trial use in 2018 and 2019.	**Complete**
107	**Nottingham Go-Ultra Low programme - promoting uptake of LEVs**	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	2016	2020	NCiC/NCC	OLEV funding	Funded	£1 Million-£10 Million	Completed	Reduction in pollutants and emissions due to increased use of low emission vehicles.	On-going take-up of cleaner vehicles	• £6.1m funding secured for 2016-2020 through the Go Ultra Low programme. • Promotion events held for public, businesses and fleet operators including loans of LEVs for trial use in 2018 and 2019 • Funding ended in 2021	**Complete**
108	**Developer requirements to provide of EV charging points at new development**	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2019	2020	BBC Planning Policy Department – Planning Policy Team Leader	N/A	Not Funded	N/A	Completed	Reduction in NO_2 and PM	Reduced Emissions	Review of the Broxtowe Local plan includes Policy 26 that would require a Travel Plan to be submitted with any planning application for 10 or more dwellings or 1,000 square metres or more floor space. This policy was	**Complete**

Measure No.	Measure	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
													adopted in September 2019.	
109	**Workplace travel plans**	Promoting Travel Alternatives	Workplace Travel Planning	2018	2020	BBC Planning Policy Department – Planning Policy Team Leader and NCC	LA – BBC and NCC	Not Funded	N/A	Completed	0.2µg/m^3	Restrain average journey times in the morning peak to a 1% increase per year	•Broxtowe Part 2 of the Local Plan (2018-2028), which includes Policy 26 on Travel Plans, was adopted in 2019. It is expected in this policy that all planning applications for large development sites (10 or more dwellings or 1,000 squares metres or more gross floor space) must include a travel plan. •BBC and NCC have a travel plan •BBC has undertaken a review of the Council travel plan and a feasibility study of having bus card/ Tickets for employee use.	**Complete** **Complete** **Complete**
110	**Planning and Policy Guidance**	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2019	2019	BBC Planning Policy Department – Planning Policy Team Leader	N/A	Not Funded	N/A	Completed	Reduction in NO_2 and PM	Reduced Emissions	Broxtowe Part 2 of the Local Plan (2018-2028), which includes Policy 20 on Air Quality, was adopted in 2019.	**Complete**
111	**Eco-driver training sessions**	Vehicle Fleet Efficiency	Driver training and ECO driving aids	2012	2018	NCC	LA –NCC	Not Funded	Within existing resources	Completed	Reduction in NO_2 and PM due to improved driving efficiency.	Reduced emissions	Eco-driving training sessions held for NCC staff	**Complete**
112	**Encouragement of low-emission public transport fleets**	Vehicle Fleet Efficiency	Promoting low emission public transport	2017	2017	NCC	NCC/OLEV - Low Emission Bus Scheme	Funded	£100k-£500k	completed	Reduction in NO_2 and PM due to increased use of low emission vehicles.	Reduced Emissions and On-going take-up of cleaner vehicles	• NCC secured £527,000 OLEV funding and match funded the scheme with £410,000 from its transport budget. • Introduction of two electric buses serving communities in Beeston and Stapleford.	**Complete**
113	**Fleet vehicle tracking system**	Vehicle Fleet Efficiency	Driver Training and ECO driving aids	2015	2017	BBC Transport and Stores Manager and NCC	LA – BBC and NCC	Not Funded	Within existing resources	Completed	Reduction in NO_2 and PM due to improved driving efficiency and efficient routes.	Reduced emissions	•All BBC and NCC fleet vehicles are fitted with a vehicle tracking system, which records vehicle speed and idling time. •measures can be implemented e.g. staff training, to	**Complete** **Complete**

Measure No.	Measure	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
													improve fleet efficiency.	
114	**Zoning of refuse collections**	Vehicle Fleet Efficiency	Other	2016	2017	BBC Transport and Stores Manager	LA - BBC	Not Funded	Within existing resources	Completed	Reduction in NO_2 and Particulate Matter as there is one less fleet vehicle used.	Reduced emissions	•A review of the refuse collection areas	**Complete** The Refuse round restructure is now complete, and we have reduced the fleet size by one vehicle.

KEY: **BBC** =Broxtowe Borough Council, **DCC**= Derbyshire County Council; **DCiC**= Derby City Council; **NCC**= Nottinghamshire County Council, **NH** = National Highways, **NCiC**= Nottingham City Council, **DfT** = Department for Transport.

= Three Key Measures

= Measures that were completed in 2024

= Measures that were completed between 2017 - 2023

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 Strategy[2], 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.

BBC purchased a Zephyr real time sensor in late 2021, which was installed in 2022 to monitor PM_{10}, $PM_{2.5}$ and NO_2 in the Trowell AQMA. There were a variety of issues with the sensor throughout 2022, and as a result BBC felt that the data was not reliable enough to report on. However, these issues were rectified, and the data is reported on in this ASR.

In 2024 the two methods used to determine the levels of $PM_{2.5}$ in the Borough are the results obtained from the Zephyr real time sensor, and to report on the modelled background levels for the Borough provided by Defra. The modelled background level provided by Defra for the Borough of Broxtowe are modelled to be between 7.2µg/m^3 and 9.2µg/m^3 for 2024, with the annual mean for 2024 being 8.1µg/m^3.

The $PM_{2.5}$ annual mean concentrations obtained from the Zephyr real time sensor for 2024 was 7.8µg/m^3. Therefore, the $PM_{2.5}$ air quality objective of 20µg/m^3 was not exceeded. Further information about $PM_{2.5}$ Zephyr results are discussed in greater details in section 3.2.3 of this report.

The Air Quality Objective (AQO) for $PM_{2.5}$ is an annual mean of 20µg/m^3. However, the World Health Organisation guideline value, which are more stringent for $PM_{2.5,}$ give a guideline of 10µg/m^3 for $PM_{2.5}$. Therefore, the results from the Zephyr and the modelling

[2] Defra. Air Quality Strategy – Framework for Local Authority Delivery, August 2023

results provided by Defra, show that the Borough are also meeting the current WHO guidelines.

As well as reviewing the Zephyr data and the modelled background data for $PM_{2.5}$, it is also important to review the Public Health Outcomes Framework (PHOF), which is published by Office for Health Improvement and Disparities and reviewed every three years. PHOF enables local authorities to identify the local indicator for $PM_{2.5}$ in their district, to compare the 'Fraction of mortality attributable to particulate air pollution indicator' value and to compare this to nearby local authorities.

Table 2.3 below provides the estimated effects of annual mortality in 2023 of human-made $PM_{2.5}$ air pollution for Nottingham City, Broxtowe Borough Council and other neighbouring local authorities. The figures show that within the Borough of Broxtowe there are modelled to be 78 deaths attributable to human-made air pollution.

Table 2.3 – Estimated Effects of Annual Mortality in 2023 of human-made $PM_{2.5}$ Air Pollution.

Council/Area	Attributable fraction	Attributable deaths aged 30+* (2023 deaths ONS)	Associated Life-years Lost due to PM based on 29,000 nationally (COMEAP 2010)
East Midlands	5.6	2793	24016
Nottingham City	6.1	152	1559
Broxtowe Borough	5.9	70	612

Source: Estimating Local Mortality Burdens associated with particulate air pollution, Office for Health Improvement and Disparities, 2023.

*Air pollution is likely to contribute a small amount to the deaths of a larger number of exposed individuals rather than being solely responsible for the number of deaths equivalent to the calculated figure of attributable deaths.

Research has shown that there is significant harm to health at concentrations of Particulate Matter well below the current EU and UK limit values. Therefore, BBC is taking the following measures to address $PM_{2.5}$:

- Ensuring that dust management plans are requested during the planning application stage for all sites that involve large scale demolition and building works.
- To ensure that best practicable means of dust control measures are being used regardless of how large the development is. These measures can include the use of bowsers, road sweepers and dust suppression to prevent ‘trackout’. Also minimise dust generating activities on dry windy days, and if there are stockpiles ensure they are covered to prevent wind-whipping.
- Ensuring that developers are carrying out dust suppression monitoring on site at large development sites.
- Ensuring that water suppressants are in use when Nibblers and mobile crushers are on site.
- Educating the public in matters that contribute to air quality e.g. not having bonfires.
- Educate and advise the public about using exempt appliances with the correct fuel for that appliance in BBCs smoke control areas.
- Enforcing the Clean Air Act 1993 and the Environmental Protection Act 1990 where necessary to minimise the risk of particulates becoming air borne.
- To continue to manage, advice and enforce the Pollution Prevention and Control Regulations 1999 and the Environmental Permitting (England and Wales) Regulations 2010 (Amended in 2013) on permitted processes when necessary.
- To encourage, support and promote sustainable travel within the Borough by working with a variety of organisations and neighbouring local authorities.
- To continue to promote green travel e.g. walking, cycling, low emissions/ electric vehicles and the tram network.
- To continue to support bus companies and taxis that operate within the Borough to reduce emissions.
- To continue to review suitable research methods for reducing air quality levels for particulate matter e.g. the use of vegetation.

- Promote and encourage the use of the final version of the “EMAQN Air Quality and Emissions Mitigation: guidance for developers” document.
- To inspect Crushers that are used within the Borough on demolition sites when notifications are received, to ensure compliance with the process permit, and good housekeeping so that dust levels are reduced.
- To communicate with all allotment providers in the Borough, to discourage the use of bonfires to dispose of green waste.
- To educate the public that electric motor vehicles whilst being positive for reducing NO_2 and CO_2, will still emit Particulate Matter and therefore active travel is still recommended as an alternative.
- Broxtowe Borough Council also formally adopted a Smoke Control Order Enforcement Policy in October 2023 to enable improved future regulation of the issue.

2.3.1 Smoke Control Areas

In 2023 Broxtowe Borough Council completed a public consultation on revoking its current Twenty-one Smoke Controls Orders which date back to the 1960’s and replacing them with a single Borough Wide Smoke Control Order.

As part of the public consultation BBC were able to obtain the following information on what the public thought to the proposals. Eighty two percent of the public support the Council to control the pollutants in the air. Fifty six percent felt that air quality is very important, sixty seven percent of people would support the introduction of a single smoke control order to prevent smoke being emitted from chimneys unless they are using authorised fuels/log burners.

The new Order to replace all the current smoke control orders was sealed in December 2024, which will come into effect in May 2025. Broxtowe Borough Council has also formally adopted a Smoke Control Order Enforcement Policy in October 2023 to support enforcement of its Order and enable improved future regulation of the issue.

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

This section sets out the monitoring undertaken within 2024 by Broxtowe Borough Council, and how it compares with the relevant air quality objectives. In addition, monitoring results are presented for a five-year period between 2020 and 2024 to allow monitoring trends to be identified and discussed.

3.1 Summary of Monitoring Undertaken

3.1.1 Medium-Cost Zephyr Monitoring Site

Broxtowe Borough Council undertook monitoring at one site during 2024 by the use of a Zephyr which is a real time sensor. The Zephyr provides useful indicative data, but at present it is not recognised by Defra, and it is not approved for use in statutory LAQM reporting. Table A.2.1 shows the details of the Zephyr monitoring site, and Appendix A.2 includes the monitoring results from the Zephyr.

Maps showing the location of the monitoring site are provided in Appendix D. Further details on how the monitors are calibrated and how the data has been adjusted are included in Appendix C.

3.1.2 Non-Automatic Monitoring Sites

Broxtowe Borough Council undertook non-automatic (i.e. passive) monitoring of NO_2 using 41 diffusion tubes during 2024. Table A.1.1 in Appendix A presents the details of the non-automatic sites.

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 (NO_2)

Table A.1.2 in Appendix A.1 compare the ratified and adjusted monitored NO_2 annual mean concentrations for the past five years with the air quality objective of 40µg/m^3. 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).

For diffusion tubes, the full 2024 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. All the tubes were deployed in line with the Defra Calendar.

Table A.2.3 in Appendix A.2 shows the ratified Zephyr monitored NO_2 hourly mean concentrations for the past five years with the air quality objective of 200µg/m^3, not to be exceeded more than 18 times a year.

The NO_2 annual mean concentration obtained from the Zephyr for 2024 was 15.5µg/m^3. The data capture was 100.0% which is greater than the 75% requirement. A comparison or trend cannot be identified as there is only two years' worth of data, and it is recommended by Defra that five years of data is usually considered the minimum necessary to identify a significant trend.

As well as discussing the results from the recently revoked AQMA in Trowell, which was revoked in January 2024. The following chapter will discuss the results and trends for all monitoting sites within 2024.

Recently Revoked AQMA in Trowell

There are five diffusion tube sites located within Tiree Close and Iona Close in Trowell that are located within the recently revoked AQMA in Trowell. The results below show that since 2016 the levels of NO_2 are consistently below the objective of 40µg/m^3 for all sites. A co-location study of triplicate tubes (Site ID 61, 62 and 63) were also sited next to the Zephyr the annual data is provided for site 63 only.

Table 3.1 – Results for the Revoked AQMA in Trowell 2015 – 2024.

Site ID	NO_2 Annual Mean Concentration (µg/m^3)									
	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
18	-	34.3	32.9	28.2	28.4	17.9	22.3	21.5	19.6	18.9
19	**42.3**	37.6	37.2	31.9	30.9	22.9	23.8	22.3	20.9	20.6
58	-	-	-	-	-	24.8	27.6	20.7	18.4	17.2
59	-	-	-	-	-	20.1	20.8	20.3	18.2	17.4
61, 62 63	-	-	-	-	-	-	-	21.7	19.4	18.7

The Results and Trends for all Monitoring Sites in 2024.

Defra requested that trend charts were provided for all monitoring sites to identify any trends in the annual mean concentrations. The trend charts are displayed in Figure A.1 in the Appendices for all the sites in use since 2020 to 2024.

Out of the 41 sites that are identified in the trend charts in Figure A.1 in the Appendices, thirty-one are showing a consistent downward trend year on year. Four sites are showing an overall downward trend. Two sites showed an increase in the 2023 data but have both shown a decrease in the 2024 data, and four sites have shown a slight increase in the 2024 data in comparison to the 2023 data.

Thirty-one of the forty-one sites are showing a consistent downward trend year on year, these sites are; Site 2, site 52, site 60, site 8, site 11, site 12, site 45, site 16, site 54, site

17, site 18, site 58, site 59, site 19, site 61/62/63, site 20, site 44, site 30, site 31, site 32, site 33/34, site 35, site 36, site 37, site 38, site 39, site 40, site 41.

Four of the forty-one sites are showing an overall downward trend of the data these sites are, site 22, site 56, site 48 and site 15.

Two of the forty-one sites showed an increase in the 2023 data, but they have both shown a decrease in the 2024 data, these sites are site 7 and site 27, which were discussed in greater detail in the 2024 ASR.

The remaining four of the forty-one sites (site 1, site 4, site 5 and site 43) have showed an increase in the 2024 data in comparison to the 2023 data (2020 excluded as an anomaly). Therefore, these sites will be discussed in greater detail below.

Site 1 - Wollaton Road, Beeston

Table 3.2 below shows the results for Wollaton Road in Beeston for 2020 to 2024, the data shows that the highest concentration was in 2021 at 21.0µg/m^3 and has since shown a downward trend. Although there has been a slight increase of 0.6µg/m^3 between 2023 and 2024. The reason for the slight increase is unknown.

Table 3.2 – Results for Wollaton Road, Beeston 2020 – 2024.

Site ID	NO_2 Annual Mean Concentration (µg/m^3)				
	2020	2021	2022	2023	2024
1	19.0	21.0	20.8	18.7	19.3

It must be noted that this site has never exceeded the Air Quality Objective (AQO) of 40µg/m^3 for NO_2, and the 2024 concentration is 20.7µg/m^3 below the AQO. Although the data is below the air quality objective of 40µg/m^3, this site will continue to be monitored.

Site 4 - Queens Road, Beeston

Table 3.3 below shows the results for Queens Road in Beeston for 2020 to 2024, the data shows that the highest concentration was in 2021 at 20.2µg/m^3 and has since shown a downward trend. Although there has been a slight increase of 0.2µg/m^3 between 2023 and 2024. The reason for the slight increase is unknown.

Table 3.3 – Results for Queens Road, Beeston 2020 – 2024.

Site ID	NO_2 Annual Mean Concentration (µg/m^3)				
	2020	2021	2022	2023	2024
4	19.1	20.2	19.2	17.2	17.4

It must be noted that this site has never exceeded the Air Quality Objective (AQO) of 40µg/m^3 for NO_2, and the 2024 concentration is 22.6µg/m^3 below the AQO. Although the data is below the air quality objective of 40µg/m^3, this site will continue to be monitored.

Site 5 - Chilwell Olympia, Bye Pass Road, Beeston

Table 3.4 below shows the results for Chilwell Olympia, Bye Pass Road in Beeston for 2020 to 2024, the data shows that the highest concentration was in 2021 at 13.5µg/m^3 and has since shown a downward trend. Although there has been a slight increase of 0.5µg/m^3 between 2023 and 2024. The reason for the slight increase is unknown.

Table 3.4 – Results for Chilwell Olympia, Bye Pass Road 2020 – 2024.

Site ID	NO_2 Annual Mean Concentration (µg/m^3)				
	2020	2021	2022	2023	2024
5	13.2	13.5	13.2	11.9	12.4

It must be noted that this site has never exceeded the Air Quality Objective (AQO) of 40µg/m^3 for NO_2, and the 2024 concentration is 27.6µg/m^3 below the AQO. Although the data is below the air quality objective of 40µg/m^3, this site will continue to be monitored.

Site 43 - Broxtowe Council Offices, Foster Avenue, Beeston

Table 3.5 below shows the results for Broxtowe Council Offices, Foster Avenue in Beeston for 2020 to 2024, the data shows that the highest concentration was in 2021 at 14.9µg/m^3 and has since shown a downward trend. Although there has been a slight increase of 0.2µg/m^3 between 2023 and 2024. The reason for the slight increase is unknown.

Table 3.5 – Results for Broxtowe Council Offices, Foster Avenue Beeston 2020 – 2024.

Site ID	NO_2 Annual Mean Concentration (µg/m^3)				
	2020	2021	2022	2023	2024
43	13.8	14.9	14.2	12.2	12.4

It must be noted that this site has never exceeded the Air Quality Objective (AQO) of 40µg/m^3 for NO_2, and the 2024 concentration is 27.6µg/m^3 below the AQO. Although the data is below the air quality objective of 40µg/m^3, this site will continue to be monitored.

3.2.2 Particulate Matter (PM_{10})

Table A.2.4 in Appendix A.2 compares the ratified and adjusted monitored PM_{10} annual mean concentrations for the past two years with the air quality objective of 40µg/m^3. The data from the Zephyr real time sensor for 2024 is 12.1µg/m^3. The data capture was 100.0% which is greater than the 75% requirement. A comparison or trend cannot be identified as there is only two year's work of data, and it is recommended by Defra that five years of data is usually considered the minimum necessary to identify a significant trend.

Table A.2.5 in Appendix A.2 compares the ratified continuous monitored PM_{10} daily mean concentrations for the past two years with the air quality objective of 50µg/m^3, is not to be exceeded more than 35 times per year. The 2024 data shows that the AQO of 50µg/m^3, was not exceeded. The data capture was 100.0% which is greater than the 75% requirement. A comparison or trend cannot be identified as there is only two years' worth of data, and it is recommended by Defra that five years of data is usually considered the minimum necessary to identify a significant trend.

3.2.3 Particulate Matter ($PM_{2.5}$)

BBC installed a Zephyr real time sensor on Iona Drive, Trowell next to the M1 Motorway. Table A.2.6 in Appendix A.2 presents the ratified and adjusted monitored $PM_{2.5}$ annual mean concentrations for the past two years. The $PM_{2.5}$ air quality objective of 20µg/m^3, were not exceeded and the annual mean was 7.8µg/m^3. Throughout 2024, the $PM_{2.5}$ concentrations were in the 'Low' category for the Daily Air Quality Index (DAQI). The data capture was 100.0% which is greater than the 75% requirement. A comparison or trend cannot be identified as there is only two years' worth of data, and it is recommended by Defra that five years of data is usually considered the minimum necessary to identify a significant trend.

3.2.4 Sulphur Dioxide (SO_2)

Previous air quality reports have shown there are no relevant sources of Sulphur Dioxide within the Borough. Subsequently, the Council does not monitor for this pollutant.

Appendix A: Monitoring Results

A.1 Diffusion Tube Monitoring Results

Table A.1.1 – 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)
1	113 Wollaton Rd, Beeston	Roadside	452527	337313	NO_2	No	0	2	N	1.9
2	166 Derby Rd, Beeston	Roadside	452091	338122	NO_2	No	0	9	N	1.8
4	226 Queens Rd, Beeston	Roadside	453361	336627	NO_2	No	0	5	N	1.8
52	228 Station Rd Beeston	Roadside	453287	336349	NO_2	No	0	5	N	1.7

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)
60	Dovecote Lane Park, Beeston	Roadside	453075	336311	NO_2	No	0	9	N	1.9
5	Chilwell Olympia School, Beeston	Urban Background	451782	335320	NO_2	No	0	104	N	1.9
7	31 Hickton Drive, Chilwell	Roadside	450756	334328	NO_2	No	0	6	N	1.9
8	The Manor Pub, 350 Nottingham Rd, Toton	Roadside	450422	334243	NO_2	No	0	5	N	1.8
11	269 Stapleford Lane, Toton	Roadside	449694	335501	NO_2	No	0	10	N	1.8

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)
12	Lamppost, Stapleford Lane, Toton	Roadside	449615	335664	NO_2	No	0	1	N	1.9
45	209 Toton Lane, Stapleford	Roadside	449467	336220	NO_2	No	0	15	N	1.8
15	George Spencer Academy, Stapleford	Roadside	449406	336135	NO_2	No	0	4	N	1.9
16	24 Brampton Drive, Stapleford	Roadside	449516	336216	NO_2	No	0	7	N	1.7
54	195 Derby Rd, Stapleford	Roadside	448467	336591	NO_2	No	0	4	N	1.8

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)
17	Lamppost Church St, Stapleford	Roadside	448890	337190	NO_2	No	0	3	N	1.8
18	20 Tiree Cl, Trowell	Roadside	448560	338889	NO_2	Yes AQMA 1	0	9*	N	1.7
58	10 Tiree Cl, Trowell	Roadside	448588	338940	NO_2	Yes AQMA 1	0	11*	N	1.7
59	4 Tiree Cl, Trowell	Roadside	448602	338965	NO_2	Yes AQMA 1	0	9*	N	1.7
19	15 Iona Drive, Trowell	Roadside	448586	339023	NO_2	Yes AQMA 1	0	18*	N	1.9

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)
61, 62 and 63	Street Column Iona Drive, Trowell ^	Roadside	448607	339026	NO_2	Yes AQMA 1	1	2*	Y	2.0
20	30 Derbyshire Ave, Trowell	Roadside	448652	339652	NO_2	No	0	12*	N	1.9
22	81 Nottingham Rd, Trowell	Roadside	448832	340098	NO_2	No	0	18*	N	1.8
44	32 Mansfield Rd, Eastwood	Roadside	446509	347091	NO_2	No	0	2	N	1.8
27	Sun Inn Pub, 6 Derby Rd, Eastwood	Roadside	446465	346985	NO_2	No	0	8	N	1.8
30	560 Nottingham Rd, Giltbrook	Roadside	448544	345241	NO_2	No	0	4	N	1.9

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)
31	15 Hayley Cl, Kimberley	Roadside	448826	344883	NO_2	No	0	7	N	1.9
32	59b Main St, Kimberley	Roadside	450122	344658	NO_2	No	0	5	N	1.8
33 and 34	19a Nottingham Rd, Nuthall^	Roadside	451631	344526	NO_2	No	0	11*	N	1.7
35	20 Nottingham Rd, Nuthall	Roadside	451728	344440	NO_2	No	0	20*	N	1.9
36	113 Nottingham Rd, Nuthall	Roadside	452232	344033	NO_2	No	0	20	N	1.7
37	114 Nottingham Rd, Nuthall	Roadside	452331	343910	NO_2	No	0	27	N	1.7

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)
38	Opp Sherwin Arms, Derby Rd, Bramcote	Roadside	450389	337866	NO_2	No	2	2	N	1.8
39	9 Bembridge Court, Bramcote	Roadside	450434	337781	NO_2	No	0	14	N	1.6
56	10 Town St, Bramcote	Roadside	450570	337851	NO_2	No	0	9	N	1.9
40	153 Derby Rd, Bramcote	Roadside	450632	337929	NO_2	No	0	13	N	1.7
41	169 Derby Rd, Bramcote	Roadside	450555	337909	NO_2	No	0	10	N	1.8
48	Near 73 Town St, Bramcote	Roadside	450817	337592	NO_2	No	0	2	N	1.8

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)
43	Broxtowe Borough Council Offices	Urban Background	452733	336962	NO_2	No	0	8	N	1.8

Notes:

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

(2) N/A if not applicable.

(*) All distance to kerb of nearest road but sites near to the M1 Motorway.

(^) Duplicate/Triplicate Diffusion Tubes.

Table A.1.2 – Annual Mean NO2 Monitoring Results: Non-Automatic Monitoring (µg/m^3)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) (1)	Valid Data Capture 2024 (%) (2)	2020	2021	2022	2023	2024
1	452527	337313	Roadside	100.0	100.0	19.0	21.0	20.8	18.7	19.3
2	452091	338122	Roadside	100.0	100.0	18.9	20.8	20.1	18.5	18.3
4	453361	336627	Roadside	100.0	100.0	19.1	20.2	19.2	17.2	17.4
52	453287	336349	Roadside	100.0	100.0	18.0	19.0	17.5	16.8	15.8
60	453075	336311	Roadside	100.0	100.0	-	-	16.8	15.8	13.9
5	451782	335320	Urban Background	100.0	100.0	13.2	13.5	13.2	11.9	12.4
7	450756	334328	Roadside	100.0	100.0	16.2	18.0	16.5	17.3	16.2
8	450422	334243	Roadside	100.0	100.0	20.8	22.4	21.1	20.1	18.2
11	449694	335501	Roadside	100.0	100.0	20.8	23.0	22.5	21.2	19.5

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) [1]	Valid Data Capture 2024 (%) [2]	2020	2021	2022	2023	2024
12	449615	335664	Roadside	100.0	100.0	17.3	19.1	18.9	17.3	16.4
45	449467	336220	Roadside	100.0	100.0	20.1	20.8	20.6	19.4	19.4
15	449406	336135	Roadside	100.0	100.0	24.4	25.2	28.3	25.6	23.5
16	449516	336216	Roadside	92.5	92.5	18.4	20.0	19.8	18.1	17.9
54	448467	336591	Roadside	100.0	100.0	21.9	23.6	22.0	20.5	19.6
17	448890	337190	Roadside	100.0	100.0	25.1	26.7	26.3	24.3	21.9
18	448560	338889	Roadside	100.0	100.0	21.5	22.3	21.5	19.6	18.9
58	448588	338940	Roadside	100.0	100.0	19.4	21.8	20.7	18.4	17.2
59	448602	338965	Roadside	100.0	100.0	19.1	21.0	20.3	18.2	17.4
19	448586	339023	Roadside	100.0	100.0	22.9	23.8	22.3	20.9	20.6

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) (1)	Valid Data Capture 2024 (%) (2)	2020	2021	2022	2023	2024
61, 62 and 63	448607	339026	Roadside	100.0	100.0	-	-	21.7	19.4	18.7
20	448652	339652	Roadside	100.0	100.0	17.3	19.7	18.7	17.4	16.5
22	448832	340098	Roadside	92.5	92.5	18.7	19.7	19.8	17.7	16.2
44	446509	347091	Roadside	92.5	92.5	24.8	27.6	26.9	24.9	23.8
27	446465	346985	Roadside	92.5	92.5	17.8	18.9	18.0	18.2	17.4
30	448544	345241	Roadside	100.0	100.0	18.3	20.3	19.1	18.4	17.9
31	448826	344883	Roadside	100.0	100.0	21.2	22.8	21.7	20.9	20.1
32	450122	344658	Roadside	100.0	100.0	21.3	22.9	20.9	19.6	16.8
33 and 34	451631	344526	Roadside	100.0	100.0	18.7	20.7	19.6	17.9	17.2

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) [1]	Valid Data Capture 2024 (%) [2]	2020	2021	2022	2023	2024
35	451728	344440	Roadside	100.0	100.0	22.6	23.4	22.9	19.9	19.6
36	452232	344033	Roadside	100.0	100.0	24.9	26.0	25.4	23.4	22.6
37	452331	343910	Roadside	100.0	100.0	19.3	23.5	21.1	19.7	19.7
38	450389	337866	Roadside	90.6	90.6	20.5	24.1	22.0	21.7	19.0
39	450434	337781	Roadside	100.0	100.0	18.6	21.1	20.5	18.6	17.9
56	450570	337851	Roadside	100.0	100.0	18.7	19.6	19.8	18.1	16.9
40	450632	337929	Roadside	100.0	100.0	23.6	27.4	25.8	24.0	21.9
41	450555	337909	Roadside	90.6	90.6	23.5	26.0	25.3	23.5	21.6
48	450817	337592	Roadside	90.6	90.6	25.4	27.8	28.4	26.6	23.7
43	452733	336962	Urban Background	100.0	100.0	13.8	14.9	14.2	12.2	12.4

☐ **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 µg/m^3.

Exceedances of the NO_2 annual mean objective of 40µg/m^3 are shown in **bold**.

NO_2 annual means exceeding 60µg/m^3, indicating a potential exceedance of the NO_2 1-hour mean objective are shown in **bold and underlined**.

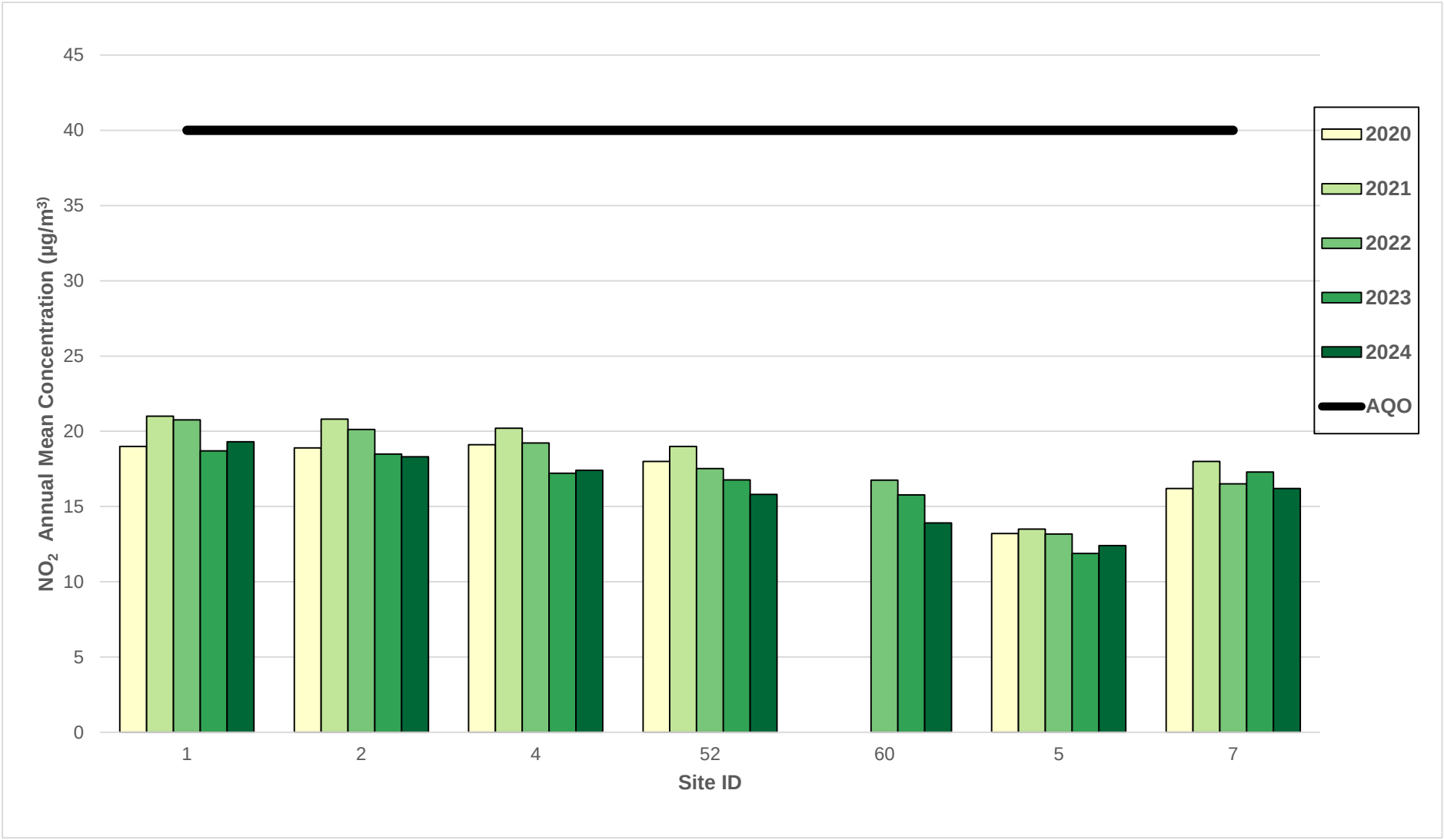
Means for diffusion tubes have been corrected for bias. All means have been "annualised" as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

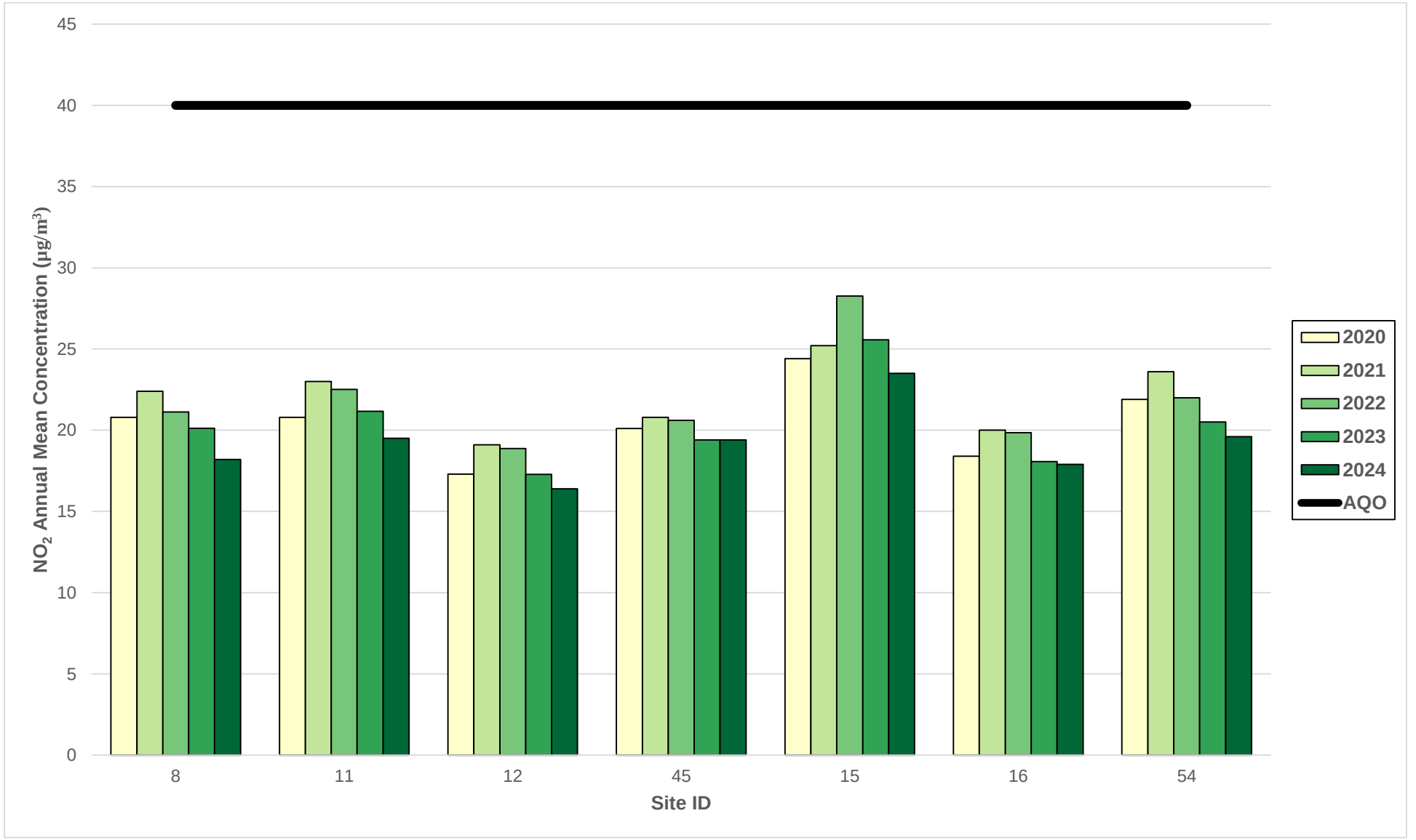
Concentrations are those at the location of monitoring and not those following any fall-off with distance adjustment.

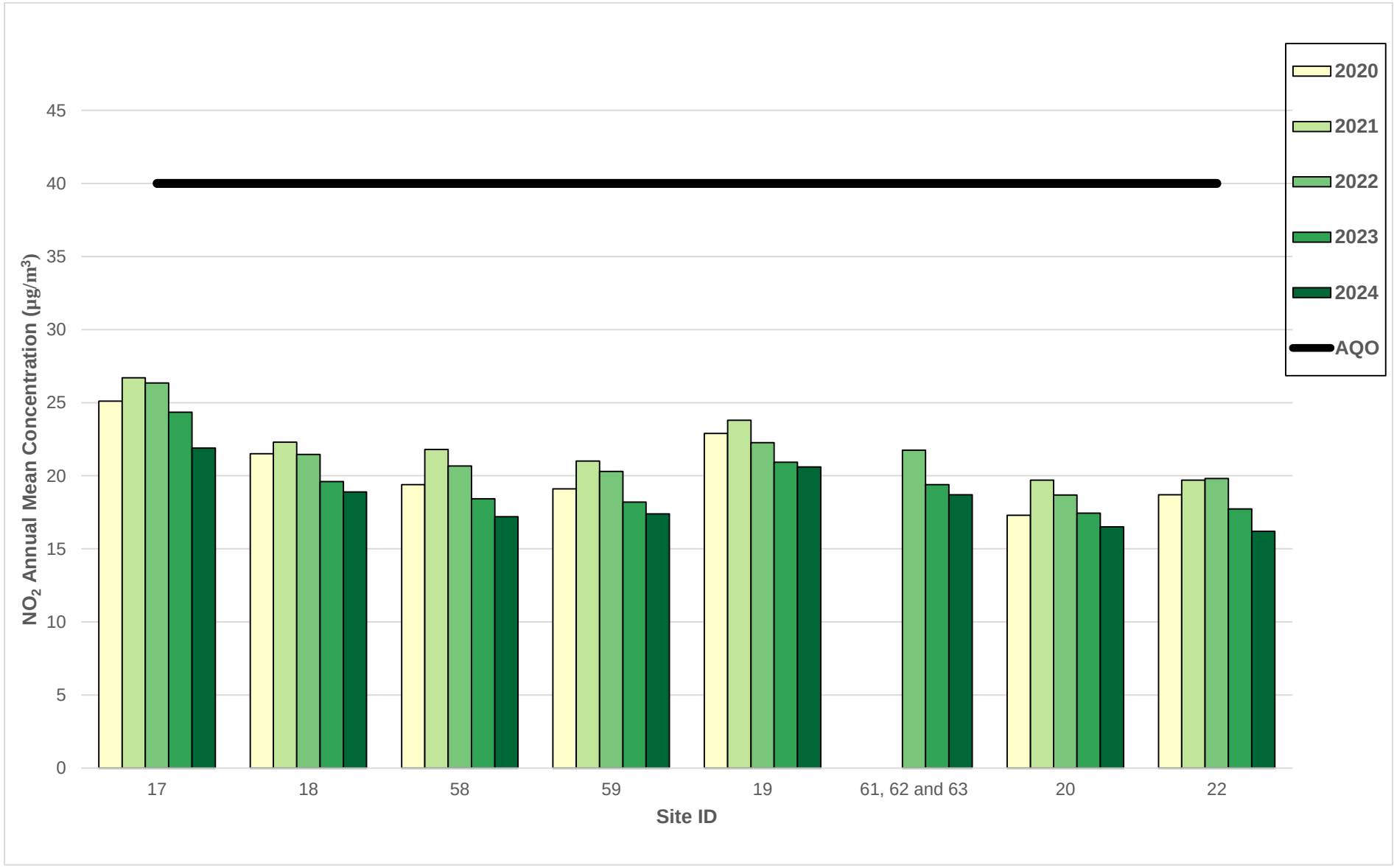
(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

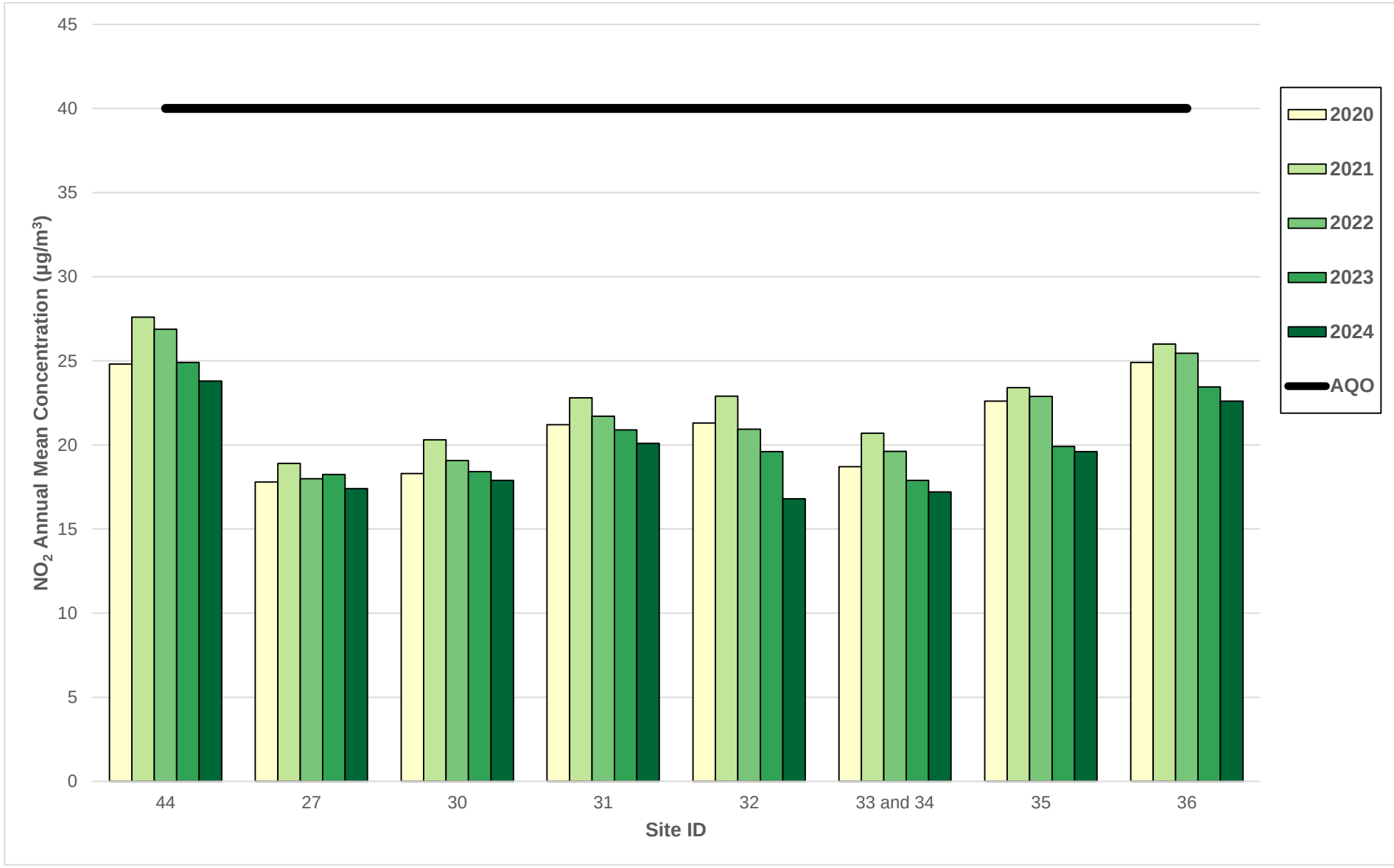
(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

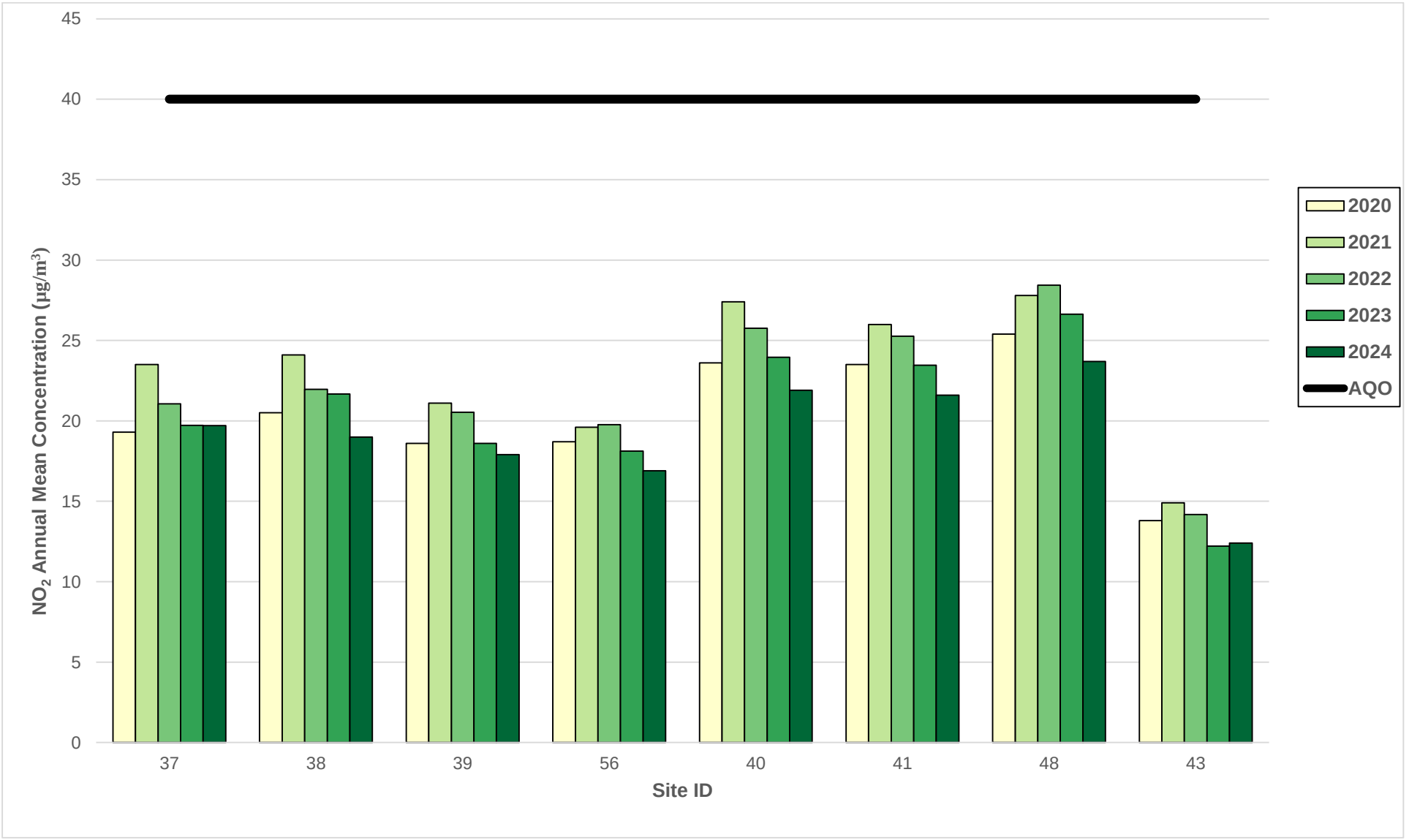
Figure A.1 – Trends in Annual Mean NO_2 Concentrations




45
40
35
30
25
20
15
10
5
0
NO2 Annual Mean Concentration (µg/m3)
8
11
12
45
15
16
54
Site ID
2020
2021
2022
2023
2024
AQO


2020
2021
2022
2023
2024
AQO
45
40
35
30
25
20
15
10
5
0
NO2 Annual Mean Concentration (µg/m3)
17
18
58
59
19
61, 62 and 63
20
22
Site ID


45
40
35
30
25
20
15
10
5
0
NO2 Annual Mean Concentration (µg/m3)
2020
2021
2022
2023
2024
AQO
44
27
30
31
32
33 and 34
35
36
Site ID


45
40
35
30
25
20
15
10
5
0
NO2 Annual Mean Concentration (µg/m3)
37
38
39
56
40
41
48
43
Site ID
2020
2021
2022
2023
2024
AQO

A.2 Low-Cost Zephyr Monitoring Results

Table A.2.1 – Details of Zephyr Monitoring Site

Site ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA?	Monitoring Technique	Distance to Relevant Exposure (m) (2)	Distance to kerb of nearest road (m) (1)	Inlet Height (m)
Trowell Zephyr 932	Street Column 4, Iona Drive, Trowell NG9 3RF	Roadside	448607	339026	NO_2, PM_{10} and $PM_{2.5}$	No	Real Time Sensor	1	2	2

Notes:

(1) N/A if not applicable.

(2) 0m if the monitoring site is at a location of exposure (e.g. installed on the façade of a residential property).

Table A.2.2 – Annual Mean NO_2 Zephyr Monitoring Results (µg/m^3)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) (1)	Valid Data Capture 2024 (%) (2)	2020	2021	2022	2023	2024
Trowell Zephyr 932	448607	339026	Roadside	100	100	-	-	-	15.6	15.5

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

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

☐ **Where exceedances of the NO_2 annual mean objective occur at locations not representative of relevant exposure, the fall-off with distance concentration has been calculated and reported concentration provided in brackets for 2023**

Notes:

The annual mean concentrations are presented as µg/m^3.

Exceedances of the NO_2 annual mean objective of 40µg/m^3 are shown in **bold**.

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%).

Table A.2.3 – 1-Hour Mean NO_2 Zephyr Monitoring Results, Number of 1-Hour Means >200 µg/m^3

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) (1)	Valid Data Capture 2024 (%) (2)	2020	2021	2022	2023	2024
Trowell Zephyr 932	448607	339026	Roadside	100	100	-	-	-	0	0

Notes:

Results are presented as the number of 1-hour periods where concentrations greater than 200µg/m^3 have been recorded.

Exceedances of the NO_2 1-hour mean objective (200µg/m^3 not to be exceeded more than 18 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 99.8th percentile of 1-hour means is provided in brackets.

(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%).

Table A.2.4 – Annual Mean PM_{10} Zephyr Monitoring Results (µg/m^3)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) (1)	Valid Data Capture 2024 (%) (2)	2020	2021	2022	2023	2024
Trowell Zephyr 932	448607	339026	Roadside	100	100	-	-	-	12.3	12.1

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

Notes:

The annual mean concentrations are presented as µg/m^3.

Exceedances of the PM_{10} annual mean objective of 40µg/m^3 are shown in **bold**.

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.

(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%).

Table A.2.5 – 24-Hour Mean PM_{10} Zephyr Monitoring Results, Number of PM_{10} 24-Hour Means > 50µg/m^3

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) (1)	Valid Data Capture 2024 (%) (2)	2020	2021	2022	2023	2024
Trowell Zephyr 932	448607	339026	Roadside	100	100	-	-	-	2	0

Notes:

Results are presented as the number of 24-hour periods where daily mean concentrations greater than 50µg/m^3 have been recorded.

Exceedances of the PM_{10} 24-hour mean objective (50µg/m^3 not to be exceeded more than 35 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 90.4th percentile of 24-hour means is provided in brackets.

(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%).

Table A.2.6 – Annual Mean $PM_{2.5}$ Zephyr Monitoring Results µg/m^3)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) (1)		Valid Data Capture 2024 (%) (2)	2020	2021	2022	2023	2024
Trowell Zephyr 932	448607	339026	Roadside	100		100	-	-	-	8.0	7.8

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

Notes:

The annual mean concentrations are presented as µg/m^3.

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.

(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%).

Appendix B: Full Monthly Diffusion Tube Results for 2024

Table B.1 – NO_2 2024 Diffusion Tube Results (µg/m^3)

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.84)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
1	452527	337313	26.6	31.1	23.4	23.2	21.7	22.2	20.8	13.2	18.0	23.2	27.9	23.9	22.9	19.3		
2	452091	338122	24.7	29.0	22.7	20.8	18.9	16.8	18.8	16.9	18.3	22.6	29.2	23.1	21.8	18.3		
4	453361	336627	26.5	28.0	20.2	18.1	16.4	14.3	15.6	16.2	16.6	23.1	29.8	23.8	20.7	17.4		
52	453287	336349	25.5	22.6	20.2	15.9	15.7	11.1	14.0	13.2	17.7	18.6	27.8	23.5	18.8	15.8		
60	453075	336311	24.3	22.7	17.9	10.7	9.8	9.9	12.3	12.9	17.1	20.0	22.7	18.5	16.6	13.9		
5	451782	335320	21.4	17.4	13.3	15.2	15.4	8.9	10.3	9.5	12.7	14.1	22.0	16.8	14.8	12.4		
7	450756	334328	26.2	31.9	17.2	12.0	11.2	13.8	15.2	15.5	16.4	21.0	27.5	23.6	19.3	16.2		
8	450422	334243	26.4	26.0	21.9	14.4	15.4	19.1	18.1	19.0	21.6	24.8	31.1	23.1	21.7	18.2		
11	449694	335501	28.0	29.9	23.4	17.0	17.7	23.4	21.0	18.5	21.8	22.8	30.2	25.3	23.2	19.5		
12	449615	335664	26.7	24.7	18.2	18.2	17.2	13.7	15.2	11.9	19.8	19.3	30.5	19.3	19.6	16.4		
45	449467	336220	25.5	29.4	23.7	29.7	26.5	16.8	17.8	16.6	17.9	23.1	29.9	19.9	23.1	19.4		
15	449406	336135	29.6	42.4	38.6	19.4	18.9	24.4	27.5	22.8	20.4	28.0	34.6	28.8	27.9	23.5		
16	449516	336216	26.3	27.5	22.0	20.8	21.1	15.5		16.9	16.2	23.5	22.8	21.3	21.3	17.9		
54	448467	336591	27.9	25.8	24.7	25.7	22.8	17.4	19.7	18.2	22.2	24.1	29.8	22.5	23.4	19.6		
17	448890	337190	32.9	33.4	26.5	17.7	18.2	22.7	23.0	22.0	23.7	28.4	35.9	28.1	26.0	21.9		

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.84)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
18	448560	338889	26.1	27.9	20.0	22.5	18.2	22.8	19.9	20.4	20.2	20.6	26.7	24.5	22.5	18.9		
58	448588	338940	25.2	24.4	19.2	17.3	16.3	18.4	18.0	17.9	18.7	20.1	27.6	22.4	20.5	17.2		
59	448602	338965	25.6	25.7	16.4	17.4	18.5	18.1	17.6	17.0	18.7	20.7	28.3	24.5	20.7	17.4		
19	448586	339023	28.1	28.8	21.1	28.2	27.6	22.3	19.7	19.8	21.3	20.6	30.7	26.1	24.5	20.6		
61	448607	339026	28.3	29.7	20.8	18.0	19.3	18.5	18.5	18.1	15.2	23.2	30.5	25.5	-	-		Triplicate Site with 61, 62 and 63 - Annual data provided for 63 only
62	448607	339026	28.2	27.8	20.2	17.9	16.7	17.4		18.9	21.4	21.7	29.8	22.2	-	-		Triplicate Site with 61, 62 and 63 - Annual data provided for 63 only
63	448607	339026	29.7	29.7	19.4	21.3	19.5	18.5	19.4	19.0	20.3	23.3	29.1	24.3	22.2	18.7		Triplicate Site with 61, 62 and 63 - Annual data provided for 63 only
20	448652	339652	26.2	22.8	22.8	19.1	21.6	13.2	14.4	13.7	19.0	21.8	23.5	18.2	19.7	16.5		
22	448832	340098	23.9	25.4		17.8	17.8	13.7	15.7	17.2	15.4	23.6	22.7	18.8	19.3	16.2		
44	446509	347091	30.2	32.6	32.2	18.0	19.1	25.4	26.8	22.9		34.1	39.2	30.8	28.3	23.8		
27	446465	346985	19.9	25.9		22.3	19.1	14.7	15.9	14.7	19.1	23.7	30.3	22.2	20.7	17.4		
30	448544	345241	24.9	25.9	21.3	21.9	22.1	15.9	14.4	15.8	17.7	24.1	28.6	23.5	21.3	17.9		
31	448826	344883	28.7	23.5	27.3	19.6	21.4	21.4	23.5	22.8	17.6	25.0	30.8	26.1	24.0	20.1		
32	450122	344658	25.6	25.1	22.3	11.3	12.1	17.4	17.3	16.1	15.3	24.3	29.1	24.5	20.0	16.8		
33	451631	344526	24.0	26.0	24.7	22.4	20.7	12.9	15.6	15.2	16.0	22.4	27.5	20.9	-	-		Duplicate Site with 33 and 34 - Annual data provided for 34 only
34	451631	344526	23.1	25.8	24.8	19.7	21.3	13.3	15.2	16.2	15.3	24.1	23.1	21.1	20.5	17.2		Duplicate Site with 33 and 34 - Annual data provided for 34 only
35	451728	344440	27.2	29.4	25.0	17.9	14.3	22.7	22.8	23.6	17.8	25.5	29.4	24.3	23.3	19.6		
36	452232	344033	28.0	33.8	30.3	29.0	25.9	25.4	25.0	24.9	17.8	24.2	32.0	27.1	26.9	22.6		
37	452331	343910	27.4	24.1	20.8	26.1	22.5	20.8	19.9	17.6	26.0	22.1	31.0	23.5	23.5	19.7		

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.84)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
38	450389	337866	31.0	29.5	27.4	10.4	11.2	17.3	19.7	19.2	23.3		32.3	27.8	22.6	19.0		
39	450434	337781	25.9	25.2	22.5	17.6	17.6	15.2	19.4	17.6	21.9	24.9	27.0	21.4	21.3	17.9		
56	450570	337851	26.4	25.0	19.3	17.0	17.3	15.6	18.4	16.4	20.5	18.7	27.4	20.0	20.1	16.9		
40	450632	337929	31.8	32.6	27.0	14.4	16.5	23.2	25.8	21.0	30.5	29.8	33.8	27.2	26.1	21.9		
41	450555	337909	34.1	31.2	26.8	20.2	18.5	21.7	22.7	24.5	25.3	27.2	30.8		25.7	21.6		
48	450817	337592	37.0	35.0	30.1	20.2	18.7	18.5	27.7	31.8	25.8		35.0	30.5	28.2	23.7		
43	452733	336962	21.0	18.6	12.4	20.8	18.1	7.4	8.7	9.1	11.4	15.2	18.1	17.1	14.8	12.4		

☒ **All erroneous data has been removed from the NO_2 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.**

☒ **Broxtowe Borough Council confirm that all 2024 diffusion tube data has been uploaded to the Diffusion Tube Data Entry System**.

Notes:

Exceedances of the NO_2 annual mean objective of 40µg/m^3 are shown in **bold**.

NO_2 annual means exceeding 60µg/m^3, indicating a potential exceedance of the NO_2 1-hour mean objective are shown in **bold and underlined**.

See Appendix C for details on bias adjustment and Annualisation.

(a) Missing tubes

(b) Result not valid

(C) Found on the Floor

(D) Water Droplets in tube as it had been turned upside down by a member of the public

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

New or Changed Sources Identified Within Broxtowe Borough Council During 2024

Broxtowe Borough Council has not identified any new sources relating to air quality within the reporting year of 2024.

Additional Air Quality Works Undertaken by Broxtowe Borough Council During 2024

Broxtowe Borough Council has not completed any additional works within the reporting year of 2024.

QA/QC of Diffusion Tube Monitoring

BBC diffusion tubes are supplied and analysed by Gradko Ltd. Since April 2008, BBC has entered into a contract with Gradko along with all Nottinghamshire Local Authorities to ensure that any deviations within different laboratory practices are ruled out. This enables data to be easily compared between the County authorities. The tubes are prepared using a 20% solution of triethanolamine (TEA) in de-ionised water. The tubes are exposed for one month before being returned for laboratory analysis. All of the tubes in 2024 were deployed in line with the Defra Calendar. The latest results for Gradko from the AIR PT/WASP Scheme are 100% of the results submitted were determined to be satisfactory.

Diffusion Tube Annualisation

All diffusion tube monitoring locations within Broxtowe Borough Council recorded data capture of 75% and above. Therefore, it was not required to annualise any monitoring data. In addition, any sites with a data capture below 25% do not require Annualisation.

Diffusion Tube Bias Adjustment Factors

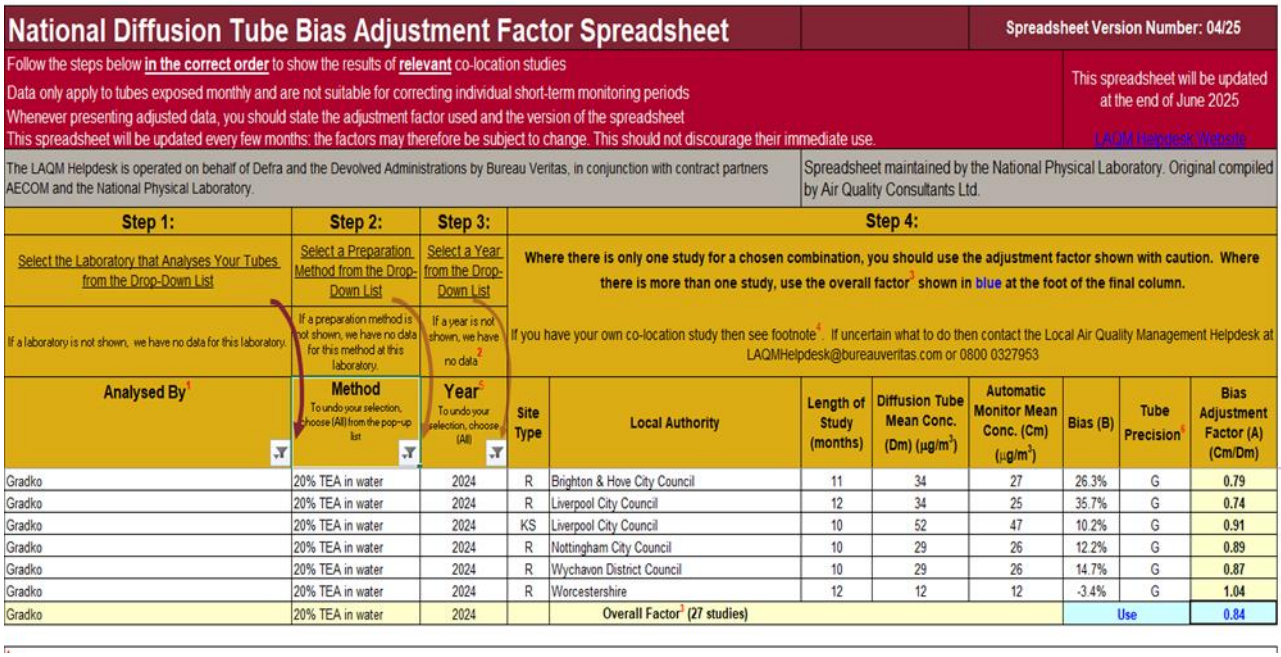
The diffusion tube data presented within the 2025 ASR have been corrected for bias using an adjustment factor. Bias represents the overall tendency of the diffusion tubes to under or over-read relative to the reference chemiluminescence analyser. LAQM.TG22 provides guidance with regard to the application 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.

Broxtowe Borough Council have applied a national bias adjustment factor of 0.84 to the 2024 monitoring data. A summary of bias adjustment factors used by Broxtowe Borough Council over the past five years is presented in Table C.1.

Table C.1 – Bias Adjustment Factor

Year	Local or National	If National, Version of National Spreadsheet	Adjustment Factor
2024	National	04/25	0.84
2023	National	03/24	0.81
2022	National	03/23	0.83
2021	National	03/22	0.84
2020	National	03/21	0.81
2019	National	03/20	0.93

Figure C.1 – The National Diffusion Tube Bias Adjustment Factor Spreadsheet showing the calculated bias correction factor used by Broxtowe Borough Council.



National Diffusion Tube Bias Adjustment Factor Spreadsheet — Spreadsheet Version Number: 04/25

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 2025

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[3] 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[4]. If uncertain what to do then contact the Local Air Quality Management Helpdesk at LAQMHelpdesk@bureauveritas.com or 0800 0327953								
Analysed By[1]	Method (To undo your selection, choose (All) from the pop-up list)	Year[2] (To undo your selection, choose (All))	Site Type	Local Authority	Length of Study (months)	Diffusion Tube Mean Conc. (Dm) (µg/m³)	Automatic Monitor Mean Conc. (Cm) (µg/m³)	Bias (B)	Tube Precision[5]	Bias Adjustment Factor (A) (Cm/Dm)	
Gradko	20% TEA in water	2024	R	Brighton & Hove City Council	11	34	27	26.3%	G	0.79	
Gradko	20% TEA in water	2024	R	Liverpool City Council	12	34	25	35.7%	G	0.74	
Gradko	20% TEA in water	2024	KS	Liverpool City Council	10	52	47	10.2%	G	0.91	
Gradko	20% TEA in water	2024	R	Nottingham City Council	10	29	26	12.2%	G	0.89	
Gradko	20% TEA in water	2024	R	Wychavon District Council	10	29	26	14.7%	G	0.87	
Gradko	20% TEA in water	2024	R	Worcestershire	12	12	12	-3.4%	G	1.04	
Gradko	20% TEA in water	2024		Overall Factor[3] (27 studies)				Use		0.84	

The Local bias adjustment factor for the Zephyr was also calculated as shown in Table C.2 below.

Table C.2 – Local Bias Adjustment Calculation

	Local Bias Adjustment Input 1
Periods used to calculate bias	12
Bias Factor A	0.7 (0.66 - 0.74)
Diffusion Tube Bias B	44% (36% - 52%)
Diffusion Tube Mean (µg/m³)	22.2
Mean CV (Precision)	5.7%
Automatic Mean (µg/m³)	15.5
Data Capture	98%
Adjusted Tube Mean (µg/m³)	16 (15 - 16)

Notes:

Although Broxtowe Borough Council have applied a national bias adjustment factor of 0.84 to the 2024 monitoring data. The Local bias adjustment factor has also been calculated as shown in Table C.2. The decision was made to use the National bias adjustment factor, as opposed to using the local bias adjustment factor, although the local bias adjustment factor had good overall precision and good data capture for several reasons, which are.

- The National bias adjustment factor is higher than the local bias adjustment factor (0.84 as opposed to 0.69). Therefore, using the National bias adjustment factor would be using the 'worst case' bias adjustment factor to correct the data with.

- Section 7.221 in TG22 states that the Local bias adjustment factor should not be calculated using real time sensors, but rather a chemiluminescence analyser. BBC has a Zephyr which is a real time sensor and not a chemiluminescence analyser.

NO_2 Fall-off with Distance from the Road

No diffusion tube NO_2 monitoring locations within Broxtowe Borough Council required distance correction during 2024.

QA/QC of Automatic Monitoring

Although the Zephyr measurements are not normally reported in the ASR as they are real time sensor and not a chemiluminescence analyser Broxtowe Borough Council felt that it was appropriate to include the data within the ASR, but the data should be treated as indicative.

BBC's data from the Zephyr is managed by Geoff Broughton from Air Quality Data Management (AQDM) and any Local Site Operator (LSO) duties for the Zephyr are undertaken by Kate Ratcliffe at BBC.

As the Zephyr is not a chemiluminescence analyser the data are not ratified like the reference instruments because there are no calibrations. Therefore, the PAS 4023, LAQM TG22 and AURN methodologies have been used instead and the obvious anomalies have been removed

The live and historic data for BBC zephyr is available through the website; https://www.ukairquality.net/

There were no significant problems with the data or the real time sensor in 2024.

PM_{10} and $PM_{2.5}$ Monitoring Adjustment

The type of PM_{10}/$PM_{2.5}$ monitor utilised within Broxtowe Borough Council do not require the application of a correction factor.

Automatic Monitoring Annualisation

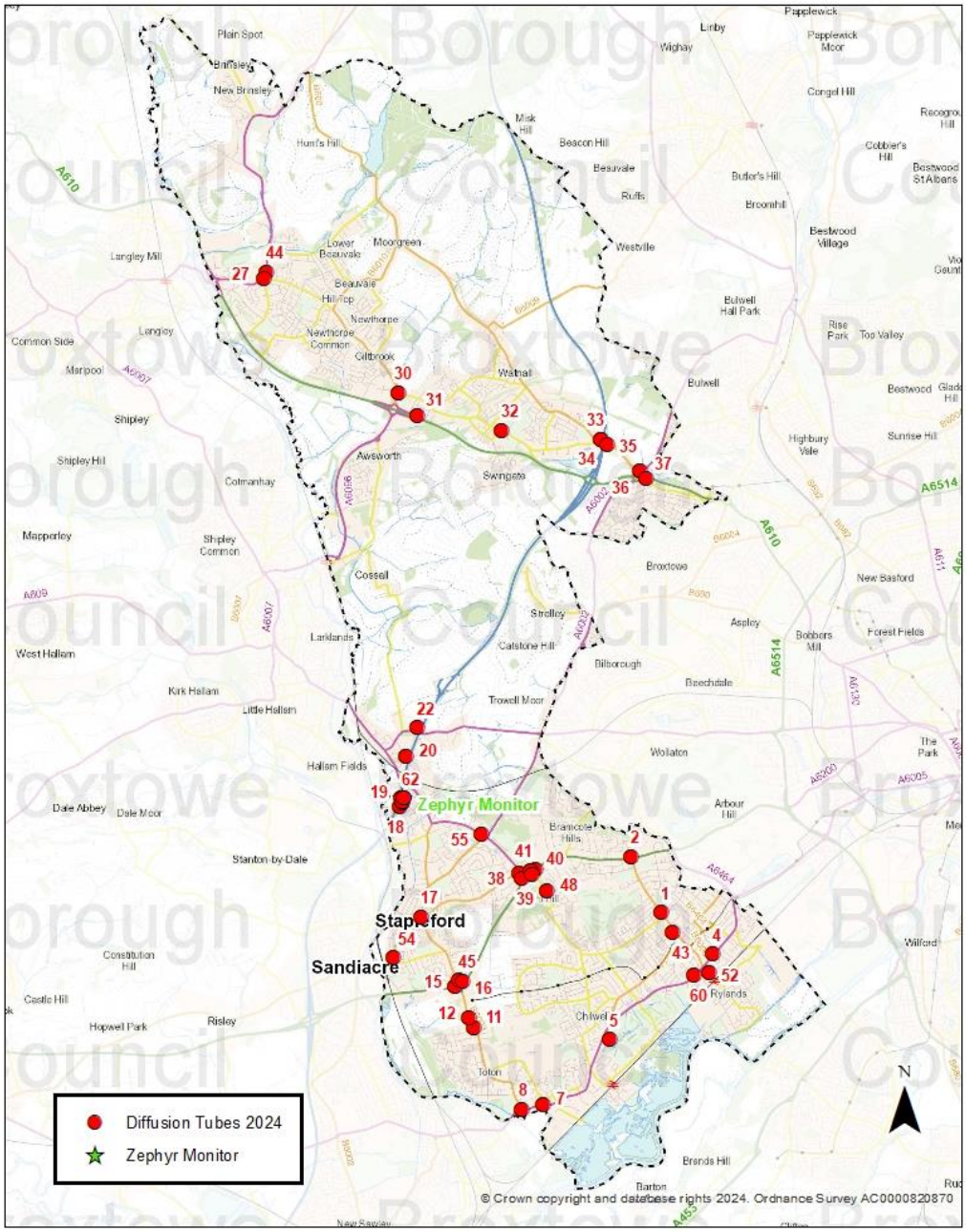
All automatic monitoring locations within Broxtowe Borough Council recorded data capture of greater than 75% therefore it was not required to annualise any monitoring data.

NO_2 Fall-off with Distance from the Road

Wherever possible, monitoring locations are representative of exposure. However, where this is not possible, the NO_2 concentration at the nearest location relevant for exposure has been estimated using the NO_2 fall-off with distance calculator available on the LAQM Support website. Where appropriate, automatic annual mean NO_2 concentrations corrected for distance are presented in Table A.3

No automatic NO_2 monitoring locations within Broxtowe Borough Council required distance correction during 2024.

Appendix D: Map of all Monitoring Locations within the Borough of Broxtowe.



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Figure D.1 – 2024 Diffusion Tube Locations and the location of the Zephyr Monitor.

Appendix E: Summary of Air Quality Objectives in England

Table E.1 – Air Quality Objectives in England[3]

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

[3] The units are in microgrammes of pollutant per cubic metre of air (µg/m^3).

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
ASR	Air Quality Annual Status Report
ATF	Active Travel Fund
AURN	Automatic Urban and Rural Network
BBC	Broxtowe Borough Council
BSIP	Bus Service Improvement Plan
CAZ	Clean Air Zone
COMEAP	Committee on the Medical Effects of Air Pollution
CV	Coefficient of Variation
Defra	Department for Environment, Food and Rural Affairs
Derv	Diesel Engine Road Vehicle
DCC	Derbyshire County Council
DCiC	Derby City Council
DfT	Department for Transport
D2N2	Local Enterprise Partnership for Derby, Derbyshire, Nottingham and Nottinghamshire
EMAQN	East Midlands Air Quality Network
EMCCA	East Midlands Combine County Authority
EU	European Union
EVCC	Electric Vehicle Cable Channels
EVI	Electric Vehicle Infrastructure

Abbreviation	Description
FDMS	Filter Dynamics Measurement System
FTZ	Future Transport Zones
GNSP	Greater Nottingham Strategic Plan
HGV's	Heavy Goods Vehicles
HS2	High Speed Train 2
HVO	Hydrotreated Vegetable Oil
ITSO	Integrated Transport Smartcard Organisation
LAQM	Local Air Quality Management
LAQM.PG(16)	LAQM Policy Guidance 2016
LAQM.TG(16)	LAQM Technical Guidance 2016
LCWIP	Local Cycling and Walking Infrastructure Plan
LEV	Low Emission Vehicles
LGA	Local Government Association
LSTF	Local Sustainable Transport Fund
µg/m^3	Microgrammes of pollutant per cubic metre of air
MOT	Multi Operator Ticket in relation to travel on buses and trams
NEPWG	Nottinghamshire Environmental Protection Working Group
NET	Nottingham Express Transit
NCT	Nottingham City Transport
NH	National Highways
NHS	National Health Service
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NCiC	Nottingham City Council
NCC	Nottinghamshire County Council

Abbreviation	Description
O_3	Ozone
OHID	Office for Health Improvement and Disparities used to be Public Health England
OLEV	Office for Low Emission Vehicles
OZEV	Office of Zero Emission Vehicles
PHOF	Public Health Outcomes Framework
PM	Particulate Matter
PM_{10}	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
$PM_{2.5}$	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
PT	Public Transport
PTP	Personalised Travel Planning
QA/QC	Quality Assurance and Quality Control
R&A	Review and Assessment
SAFED	Safe And Fuel-Efficient Driving
SEDBUK	Seasonal Efficiency of a Domestic Boiler in the UK
SO_2	Sulphur Dioxide
SQPS	Statutory Quality Partnership Schemes
TEA	Triethanolamine
UK	United Kingdom
UKSPF	United Kingdom Shared Prosperity Fund
ULEVs	Ultra Low Emission Vehicles
WASP	Workplace Analysis Scheme for Proficiency
WHO	World Health Organisation
WPL	Workplace Parking Levy

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Cabinet **29 July 2025**

Report of the Portfolio Holder for Environment and Climate Change

Vehicle Fleet Replacement Programme – Reallocation of Capital Budgets

1. Purpose of Report

The purpose of the report is to seek approval for the reallocation of a proportion of the capital expenditure budget for fleet vehicle procurement, from both the 2027/28 and 2026/27 programmes.

2. Recommendation

Cabinet is asked to RESOLVE that the capital budgets for the fleet vehicle and plant replacement programme be reallocated across financial years to allow for the early purchase of two vehicles be approved.

3. Detail

This report outlines the proposed reallocation of capital funding originally allocated in the 2026/27 and the 2027/28 budget cycle for two key vehicle assets with the Council's fleet: a refuse freighter and a JCB. The adjustments are necessary due to recent operational developments and vehicle reliability issues.

Refuse Freighter

On 10 December 2024, a refuse freighter vehicle suffered an engine fire. Following assessment, the insurers deemed the vehicle economically unrepairable and wrote it off. The insurance settlement paid out £8,750, less a £250 excess.

The loss of this vehicle has resulted in a shortfall within the refuse collection fleet, necessitating in frequent hire of a replacement vehicle at approximately £1,000 per week to maintain service continuity.

To mitigate operational disruption, it is proposed to bring forward an allocation from the 2026/27 capital programme budget back into 2025/26, allowing for the immediate procurement of a replacement vehicle within the current financial year.

JCB

The depot's JCB was acquired in 2020. It has experienced ongoing mechanical problems, including engine fan failures and filter blockages, which have required multiple repairs. The frequency and cost of these repairs are becoming uneconomical and continued investment in repairs to this vehicle are no longer viable.

Currently scheduled for replacement in the 2027/28 cycle, the vehicle's persistent issues have rendered it unsuitable for continued use. It is proposed to advance the budget allocation for the JCB's replacement from the 2027/28 to the 2026/27 capital programme.

The reallocation of these capital funds will ensure uninterrupted service delivery and operational efficiency. Approving these adjustments will facilitate timely procurement of the respective replacements, thereby minimising operational risks and additional costs.

4. Key Decision

This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as it will result in the Council incurring a capital expenditure of £250,000 or more.

5. Updates from Scrutiny

Not applicable.

6. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

The approved capital programme for 2025/26 to 2027/28 includes the fleet and plant replacement programme totalling £2.250m. This is currently split £880k in 2025/26; £715k in 2026/27; and £655k in 2027/28. The budget captures the investment required to replace fleet vehicles and plant machinery that have reached their lifecycle limit that underpins individual financial viability.

The proposal is to bring forward £230k for the refuse freighter from 2026/27 into the current year capital programme and to reallocate £85k for the JCB from the 2027/28 capital programme into the 2026/27 capital programme. The updated split would therefore be £1.110m in 2025/26, £570k in 2026/27, and £570k in 2027/28. The total programme would remain the same with the cost being funded from prudential borrowing.

There would be an earlier uplift in revenue costs in 2026/27 with sooner than anticipated capital financing costs of around £38k. These will be picked up as part of the annual budget setting process.

7. Legal Implications

The comments from the Monitoring Officer / Head of Legal Services were as follows:

There are no direct legal implications arising from this report.

8. Human Resources Implications

   Not applicable.

9. Union Comments

   Not applicable.

10. Climate Change Implications

    Not applicable.

11. Data Protection Compliance Implications

    This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    Not applicable.

13. Background Papers

    Nil.

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Cabinet **29 July 2025**

Report of the Portfolio Holder for Community Safety

Revised Safeguarding Children Policy 2025-28

1. Purpose of Report

To review and approve the revised Safeguarding Children Policy 2025-28. This is in accordance with the Council's Corporate Priority of Community Safety.

2. Recommendation

Cabinet is asked to RESOLVE that the revised Safeguarding Children Policy 2025-28 be approved.

3. Detail

The Council has a specific statutory duty under Section 11 of the Children Act 2004 to make arrangements for ensuring that its functions, and services provided on its behalf, are discharged with regard to the need to safeguard and promote the welfare of children.

Safeguarding and promoting the welfare of children is defined in Government Guidance 'Working Together to Safeguard Children 2018' 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; and
- taking action to enable all children to have the best outcomes.

As such, the Council is responsible for ensuring that Members and employees, including those who are under contract, are competent and confident in carrying out their responsibilities for safeguarding and promoting the welfare of children and young people. This includes ensuring employees are aware of how to recognise and respond to safeguarding concerns, including signs of possible maltreatment.

The Safeguarding Children Policy sets out how the Council will meet its obligations. It is a revised version of the Safeguarding Children Policy agreed by the Community Safety Committee in 2022.

The revised Safeguarding Children Policy can be found at **Appendix 1**. The change table can be found at **Appendix 2**. The Council's safeguarding data for 2024 can be found at **Appendix 3**. The Equality Impact Assessment can be found at **Appendix 4.**

4. Key Decision

   This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 and will be significant in terms of its effects on communities living or working in an area comprising two or more Wards or electoral divisions in the Council's area.

5. Updates from Scrutiny

   Policy Overview Working Group recommended that the Revised Childrens Safeguarding Policy be approved at its meeting of 5 June 2025.

6. Financial Implications

   The comments from the Head of Finance Services were as follows:

   There are no additional financial implications to consider at this stage with ongoing business as usual activities being met within existing resources. Any significant budget implications in the future, over and above virement limits, would require approval by Cabinet.

7. Legal Implications

   The comments from the Monitoring Officer / Head of Legal Services were as follows:

   Section 11 of the Children Act 2004 places a duty on the Council when providing services to have regard to the need to safeguard and promote the welfare of children. The introduction section of this policy sets out the duties from the Children Act 2004 and the Government guidance 'Working together to Safeguard Children 2018'.

8. Human Resources Implications

   Not applicable.

9. Union Comments

   Not applicable

10. Climate Change Implications

    The climate change implications are contained within the report.

11. Data Protection Compliance Implications

    This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    As this is a change to policy an equality impact assessment is included in the appendix to this report.

13. Background Papers

    Nil.

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Appendix 1

Broxtowe Borough COUNCIL

SAFEGUARDING CHILDREN POLICY 2025-28

CONTENTS

	Introduction
Section 1	Aim
Section 2	Objectives
Section 3	Scope
Section 4	Roles and Responsibilities
Section 5	Other Relevant issues
Section 6	Dealing with Incidents and Concerns
Section 7	Procedures and Information

Appendices	A – Reporting a safeguarding children concern
	B – Reporting an immediate safeguarding children concern
	C – Disclosure of information from a child
	D – Disclosure from a member of the public
	E – Members guide to reporting a safeguarding children concern
	F - Concerns about a staff member or councillor in respect of safeguarding children
	G – Supplementary reporting form in respect of Child Sexual Exploitation
	H – Policy statement and procedure template for voluntary organisations
	I – Guidelines for conduct when working/having contact with children
	J – List of contacts
	K – Signs of child abuse

INTRODUCTION

Broxtowe Borough Council (the Council) has a specific statutory duty under Section 11 of the Children Act 2004 to make arrangements for ensuring that its functions, and services provided on its behalf, are discharged with regard to the need to safeguard and promote the welfare of children. This includes safe recruitment practices for individuals whom the Council permits to work regularly with children, and, when required, obtaining criminal record checks.

Safeguarding and promoting the welfare of children is defined in Government Guidance 'Working Together to Safeguard Children 2018' 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; and
- taking action to enable all children to have the best outcomes

As such, the Council is responsible for ensuring that Members and staff, including those contracted, are competent and confident in carrying out their responsibilities for safeguarding and promoting the welfare of children and young people. This includes ensuring staff are aware of how to recognise and respond to safeguarding concerns, including signs of possible maltreatment. The Council is therefore committed to ensuring the availability of adequate resources and support for employee training and development.

In accordance with the Children Act 1989 and 2004, a child is any person who has not yet reached their 18th birthday (including unborn babies). Therefore, for the purpose of this Safeguarding Children Policy, any reference to children and young people means those under the age of 18.

This Policy is intended to clarify individual roles and responsibilities, raise awareness and reassure staff that there are clear processes in place should they have any concerns or in the rare event that an allegation is made against an individual employee. The procedures complement those of the Nottinghamshire Safeguarding Children Partnership. These may be referred to for further guidance as necessary and can be found at: Policy and guidance

Even though many members, staff and contractors have limited contact with children as part of their duties and responsibilities for the Council, everyone should be aware of the potential indicators of abuse and be clear about what to do if they have concerns.

There are four types of abuse that can affect children and young people: Physical, Emotional, Sexual, and Neglect. Types of abuse is covered in more detail in Appendix K.

It is not the responsibility of any Councillor, employee or contractor to determine whether abuse is taking place. Concerns, incidents or allegations must be reported. The role of the Councillor, employee or contractor is to refer the case to the appropriate person, not to investigate or make a judgement. Reporting and other procedures are listed in Section 7 and detailed in the subsequent appendices.

1.0 AIM

To safeguard and promote the welfare of children in all aspects of the provision of Broxtowe Borough Council's services.

2.0 OBJECTIVES

To achieve its aim, Broxtowe Borough Council has set the following objectives:

- To fully assist Nottinghamshire County Council and other relevant agencies in the safeguarding and promotion of the welfare of children.
- To provide staff members and volunteers (working on behalf of the Council) with training, guidance and support to assist them in recognising and responding to indicators of possible abuse or neglect
- To ensure that all Members and staff working with children can identify the signs and symptoms of the four main types of abuse (physical abuse, sexual abuse, emotional abuse, and neglect).
- To ensure that all Members and staff understand and follow the relevant procedures when they have concerns about child abuse or neglect.
- To ensure that the necessary enhanced Disclosure and Barring Service (DBS) or Police vetting checks are completed, as determined by the Council's Recruitment and Selection Policy, for staff that work with or have significant access to children.
- To ensure that the necessary child protection training, information and guidance is made available to all appropriate individuals, clubs, groups, societies and organisations that organise activities for children on behalf of, or within buildings, facilities or on land provided by the Council.
- To provide guidance to all Members and staff on appropriate and safe working practices when working with children.

3.0 SCOPE

This Policy is applicable to all of the Council's functions and services, as well as the operations of partners, contractors and voluntary organisations that deliver services for the Council, through grant or contract arrangements. Such organisations must maintain or develop their own safeguarding policy statement and procedures to reflect this Policy.

4.0 ROLES AND RESPONSIBILITIES

All individuals, contractors and agencies have a duty to ensure they are familiar with and can access the Council's reporting safeguarding procedures, or are familiar with and can access those of their own company/agency.

Nottinghamshire Safeguarding Children Partnership

Nottinghamshire Safeguarding Children Partnership provides the safeguarding arrangements required under the Children and Social Work Act 2017 and the statutory guidance 'Working Together to Safeguard Children 2018. The purpose of safeguarding arrangements is to support and enable local organisations and agencies to work together to safeguard and promote the welfare of children. The partnership was formed on 1 January 2019 and intends to build on the strengths of the previous arrangements under the Local Safeguarding Children Board (LSCB). Through the introduction of new arrangements, in compliance with the legislation, the partnership is particularly seeking to achieve the following:

- Clear accountability – the safeguarding partners (Police, National Health Service and local authority) have a joint and equal responsibility for setting up the arrangements and making sure they work.
- Faster response to serious child safeguarding cases including undertaking 'Rapid Reviews' to identify if any immediate action is needed to ensure children's safety, identify any learning or improvements needed, and consider whether a more in-depth Child Safeguarding Practice Review is needed.
- Engage with a wider range of organisations and connect better with lead safeguarding practitioners.
- Provide a streamlined structure, reducing duplication and lessening the demand on safeguarding leads to attend meetings.

The vision for the partnership is 'That children and young people in Nottinghamshire grow up in a safe and stable environment and are supported to lead healthy, happy and fulfilling lives

The safeguarding partners responsible for the safeguarding arrangements under the Nottinghamshire Safeguarding Children Partnership are Nottinghamshire County Council, Nottinghamshire Police, and the National Health Service.

All three safeguarding partners have equal and joint responsibility for local safeguarding arrangements. In situations that require a clear, single point of leadership, the safeguarding partners will decide who should take the lead on that issue.

The safeguarding partners are obliged to set out within their arrangements which organisations and agencies are required to work as part of those arrangements to safeguard and promote the welfare of local children. These organisations and

agencies are referred to as relevant agencies and when nominated by the safeguarding partners as a relevant agency, organisations should act in accordance with the arrangements.

Acting in accordance with the safeguarding arrangements requires safeguarding partners and relevant agencies to work together and:

- Fully engage with the Nottinghamshire Safeguarding Children Partnership functions.
- Provide information which enables and assists the safeguarding partners to perform their functions to safeguard and promote the welfare of children in their area, including as related to local and national child safeguarding practice reviews.
- Ensure that their organisation works in accordance with the interagency safeguarding procedures approved by the partnership.
- Have appropriate robust safeguarding policies and procedures in place specifically relevant to their organisation.
- Provide evidence of the above to the Assurance Learning and Improvement Group.

Broxtowe Borough Council, as a relevant agency, will be committed to providing an effective working relationship as part of the new structures with the Nottinghamshire Safeguarding Partners to help achieve mutual aims in respect of child safeguarding.

Elected Members
Elected Members are responsible for the monitoring and review of this Policy, as well as adhering to best practice, participating in relevant training and reporting any disclosure, concern, incident or allegation to the Head of Communities and Community Safety. Guidance for Members on reporting concerns in relation to safeguarding children is given at Appendix E.

General Management Team and Heads of Service/Assistant Directors
The General Management Team, led by the Chief Executive, will lead the authority with regard to safeguarding children responsibilities. The General Management Team in conjunction with Heads of Service/Assistant Directors will ensure that this Policy and the associated procedures are properly implemented to ensure the Council's duties and responsibilities with respect to safeguarding children are properly discharged. Heads of Service/Assistant Directors are responsible for ensuring the necessary supervision and training of appropriate employees, so that any concerns of safeguarding children are reported promptly and appropriately.

Designated Lead Officer
The Council has a Designated Lead Officer to ensure all reports of abuse or allegations against staff are dealt with promptly in accordance with this Policy and the Joint Nottinghamshire and Nottingham City Safeguarding Children Procedures.

The Designated Lead Officer is the Head of Communities and Community Safety. That Officer is responsible for:

- Writing, reviewing, and implementing the Council's Safeguarding Children Policy.
- Reporting to General Management Team and Members on the number of referrals made to the Multi Agency Safeguarding Hub (MASH) and any changes to policy or guidance.
- Working to assess and reduce risks in relation to safeguarding children.
- Raising awareness of safeguarding issues amongst staff.
- Establishing and maintaining effective multi-agency working with Nottinghamshire's Safeguarding Partners, other district councils, and other relevant statutory and non-statutory agencies.
- Identifying and providing for staff training needs.

Human Resources Manager
The Human Resources Manager is responsible for ensuring safe recruitment and employment practices are in place in accordance with the Children's Act 2004 and the Safeguarding Children agenda and for ensuring that appropriate checks are carried out on all staff who have regular contact with children. The Human Resources Manager is also responsible for receiving and acting on all concerns of abuse allegedly being perpetrated by staff or Members.

Departmental Safeguarding Leads
Some divisions within the Council (for example, Housing) will have Safeguarding Lead Officers. Their role is to liaise with the Designated Lead Officer as well as officers within their own division, on specific cases and general issues.

All Staff
All staff have a responsibility to report any concerns about the welfare of children to the Designated Lead Officer or to their line manager. Staff of the Council are not, however, responsible for deciding on subsequent action after making a report.

All staff are responsible for participating in relevant training and in particular, will complete the e-learning package made available through the Nottinghamshire Safeguarding Children Partnership via the Broxtowe Learning Zone. For new members of staff this will be a compulsory part of their induction and for other officers, there will be a requirement to undertake refresher training on a three yearly basis.

Contractors and other agencies
The Council will take reasonable care that contractors and other agencies undertaking work on its behalf are monitored appropriately. Any contractor, sub-contractor, or other agency engaged by the Council in areas where workers are likely to come into regular contact with children, should have its own equivalent child protection policy, or failing that, must comply with the terms of this Policy. This requirement will be written into the contract. Where contact with children is a necessary part of the contracted service, it is the responsibility of the manager who is using the services of the contractor or agency to ensure that satisfactory Disclosure and Barring Service (DBS) checks have been completed where appropriate, and all other requirements of this Policy are complied with.

Lead Agencies
Nottinghamshire County Council, the Police and the National Health Service will take the lead as Safeguarding Partners in assessing whether abuse has taken place, or whether a child is at risk of abuse.

5.0 OTHER RELEVANT ISSUES

Licensing
The Council is responsible for carrying out certain licensing functions. Protection of children from harm is a licensing objective that the Council is legally obliged to consider as part of those functions, particularly licensing premises under the Licensing Act 2003, the Gambling Act 2005, and taxi licensing. Safeguarding children training is compulsory for anyone applying to be licensed as a taxi driver by the Council.

Health and Safety at Work
Where the Council inspects premises to discharge its legal responsibilities in this area, employers may be obliged to carry out risk assessments, including for the employment of young people. As part of the inspection process, officers may examine such risk assessments to determine their suitability. If evidence is gained that young people are working without relevant permits in place, or in 'unsuitable workplaces', the Council will report this to Nottinghamshire County Council.

Homelessness
The Council owes a legal duty to provide temporary accommodation to individuals whose status and circumstances meet certain criteria as defined by statute. Officers may need to refer families or individuals to Nottinghamshire County Council Social Care.

Persons affected	**Reason for contacting Notts Social Care**
Homeless 16-17 year olds	A 16 or 17 year old may be referred to Children's Social Care for assessment to determine if they are a child in need with a duty owed to them by Nottinghamshire County Council.
Homeless Care Leavers 16-25 year olds	The Council has a duty to house care leavers who are 16-25 years of age. Where they are found to be intentionally homeless Senior Officers from the Council will meet to resolve the case. In exceptional circumstances where this is not achievable a Senior Officer and Social Care must meet within a few days to resolve the situation. There is a care leavers team in place to assist care leavers using the care leavers pathway

Persons affected	Reason for contacting Notts Social Care
Intentionally homeless household with children	If a household with children is found to be intentionally homeless, Children's Social Care should be advised in writing the same day where possible so that they can ascertain whether a duty is owed under the Children Act 1989. Even where their duty is discharged Housing ensure the family are housed whilst this process is undertaken.

The Council only places children or vulnerable adults into 'Bed and Breakfast' or temporary accommodation in an emergency and as a last resort. Officers complete a detailed Housing Options assessment with applicants. This helps to identify needs and vulnerabilities and assists in the process of safeguarding children.

Photography
It is an unfortunate fact that some people have used children's events as opportunities to take inappropriate photographs or footage of children and young people. Members, staff and contractors should be vigilant at all times. At events where photographs will be taken, photography signs should be clearly displayed. Anyone using cameras or film recorders for, or on behalf of, the Council must have either completed media consent forms from the parents of children being photographed or filmed, or have checked with the parent or guardian before the activity commences. When commissioning professional photographers or inviting the press to cover the organisation's services, events and activities, the Council will ensure that expectations are made clear in relation to child protection. Council staff should contact the Communications Team on Ext 3825 for advice, forms and posters.

Human trafficking
Trafficking involves the transportation of persons in the UK in order to exploit them by the use of force, violence, deception, intimidation, coercion or abuse of their vulnerability. The Council recognises that local authorities have specific responsibilities under the Council of Europe's 2006 'Declaration on the Fight Against Trafficking of Human Beings' to which the UK is a signatory. While trafficking mainly involves adults, children can be involved. Staff should discuss concerns they may have with the Designated Lead Officer. Also, the United Kingdom Human Trafficking Centre (UKHTC) [now part of the National Crime Agency] is a national organisation that can provide advice.
http://www.nationalcrimeagency.gov.uk/

Child Sexual and Criminal Exploitation
Child Sexual or Criminal Exploitation (CSE or CCE) is a form of child abuse where children and young people are forced or manipulated into sexual or criminal activity. The sexual or criminal exploitation of children and young people has been identified throughout the UK in both rural and urban areas. Essentially, it is a form of abuse and as such, the procedures for reporting concerns are the same as for other

categories. Staff should report any concerns to their line manager, or directly with the Designated Lead Officer, who will complete the relevant form (Appendix G) and refer the matter to Nottinghamshire Police.

Temporary, External, and Agency Staff

The Council employs a number of staff on a temporary, external, and agency basis (for example, sports coaches). Measures will need to be put in place by the relevant Head of Service/Assistant Director where such staff are employed to ensure that they have received suitable training in Safeguarding Children, and that Disclosure and Barring Service checks, where appropriate, have been undertaken.

Information Sharing

It is important to remember that confidentiality is critically important at all stages of the reporting procedure. This is necessary to safeguard all parties including the potential perpetrator. Employee responsibilities are to inform only those people identified within the policy and not to discuss the case casually with their colleagues. The important statutory duties in relation to safeguarding children cannot be met without effective and appropriate sharing of relevant information, some of which may normally be regarded as confidential between an employee and customer or client. Confidentiality should not be confused with secrecy. Information may be shared in order to comply with a statutory obligation, or if it is in the public interest.
In making decisions about sharing information, the safety and needs of the child must be the primary consideration. Information can be disclosed without consent where an employee has well-founded concerns that disclosure is necessary to:

- safeguard a particular child - including disclosure of information about an adult who may pose a risk of significant harm to a child or children
- prevent a criminal act taking place or where seeking consent would interfere in criminal enquiries
- prevent harm to staff
- prevent a child being at increased risk of harm.

Information sharing between Broxtowe Borough Council and agencies such as the Police, Probation, Victim Care etc in Nottinghamshire is done through the secure information sharing system Empowering Communities with Integrated Network Systems (ECINS).

6.0 DEALING WITH INCIDENTS AND CONCERNS

The procedures for dealing with safeguarding children incidents and concerns are listed in Section 7.0 of this Policy.

Allegations made by others, even where anonymous, must always be taken seriously and must not be assumed to be malicious in the first instance. Officers informed of a concern by a member of the public, employee, or colleague, must act in accordance with this Policy.

It is not the responsibility of employees to decide whether or not child abuse has taken place. They have a duty to report concerns and must not assume someone

else has done so. It is an employee's responsibility to act on any disclosures, suspicions, or allegations as follows:

- All staff are responsible for discussing any disclosure, suspicions or allegations immediately with their line manager or directly with the Designated Lead Officer.
- The line manager will then make the referral to the appropriate authority with regards to the thresholds in the Pathway to Provision (Version 8).
- The line manager will then send the report to, and discuss the situation with, the Designated Lead Officer.
- The Designated Lead Officer is responsible for logging all referrals.
- A brief guide for staff (Safeguarding Children – Staff Guide) is available on the intranet under Document Index / Corporate documents / Safeguarding **https://intranet.broxtowe.gov.uk/media/4175/guidance-leaflet-for-safeguarding-children.pdf**

7.0 PROCEDURES AND INFORMATION

Specific procedures and information are contained in the following appendices:

APPENDIX A

Reporting a Safeguarding Children Concern

1. Officers should try to make notes at the time or as soon as possible after they become concerned. Consider possible witnesses, times, clothing, age, location and any contact information, as well as noting what actions have been taken.
2. Officers must always try to make parents or carers aware of their concerns UNLESS it puts the child at further risk, it puts the officer at further risk, it could affect a criminal investigation, or it is impractical to do so.
3. Report the matter to line manager or where unavailable directly to the Designated Lead Officer.
4. The line manager alongside the officer completes the online referral form to the Nottinghamshire Multi Agency Safeguarding Hub (MASH) Report a new concern about a child | Nottinghamshire County Council as soon as possible. Where they are unavailable the officer should complete the online referral form with the Designated Lead Officer or an alternative manager.
5. Line manager MUST the same or the next working day e-mail a copy of the referral form or all the relevant information to spc@broxtowe.gov.uk the Designated Lead Officer will enter the details onto the safeguarding database.
6. MASH should report back to the person reporting the incident within three days on the course of action to be taken.
7. If MASH is of the opinion that the threshold is not met for a Children's Social Care Assessment, they will signpost the person making the referral to the appropriate service.
8. The person making the referral will update the Designated Lead Officer by e-mail to spc@broxtowe.gov.uk of the outcome of the referral and of the details of any recommendation to refer to another agency and the Designated Lead Officer will be responsible for updating the database.

9. Any officer submitting a referral, whether directly themselves, through their line manager MUST inform their Head of Service.

For further advice or information, contact: Head of Communities and Community Safety (Designated Lead Officer) 0115 917 3492

Multi Agency Safeguarding Hub (MASH) Tel: 0300 500 80 90
Office hours Monday to Thursday 8.30am to 5.00pm
Friday 8.30am to 4.30pm
mash.safeguarding@nottscc.gov.uk
Piazza,
Little Oak Drive,
Sherwood Business Park,
Annesley,
Nottinghamshire
NG15 0DR

Emergency Duty Team
In an emergency outside MASH office hours, contact the Emergency Duty Team (EDT) on 0300 456 4546

APPENDIX B

Reporting an Immediate Safeguarding Children Concern

If an incident is identified, which requires immediate intervention, staff will be required to respond accordingly. Each case will be different and specific guidelines for every incident are not feasible.

Wherever possible, an officer with immediate concerns should contact their line manager or the Designated Lead Officer.

If the line manager, Designated Lead Officer cannot be contacted, and the situation is deemed to be so serious as to warrant immediate action, the officer may be required to deal with the matter themselves and contact MASH on 0300 500 80 90 or complete the online referral form https://www.nottinghamshire.gov.uk/care/safeguarding/childrens-mash/report-a-new-concern-about-a-child

The well-being of the child is paramount and the appropriate response which, dependent on the nature of the incident, may include:

- Immediate emergency call to Police (999).
- Immediate contact with Nottinghamshire Multi-Agency Safeguarding Hub (MASH) 0300 500 80 90 (Mon to Thurs 8.30am-5.00pm, Fri 8.30 to 4.30pm) or outside these hours, Nottinghamshire MASH Emergency Duty Team 0300 456 4546.
- Immediate verbal intervention with support from the most senior officer available on site without placing the child or an officer at further risk.

As soon as possible after the incident, the matter must be confirmed by e-mail to spc@broxtowe.gov.uk and the Designated Lead Officer will enter the details onto the safeguarding database.

MASH should report back to the person reporting the incident within three days on the course of action to be taken, any updates must be forwarded to the Designated Lead Officer through spc@broxtowe.gov.uk

The Designated Lead Officer shall be responsible for referring the case on to other agencies if advised to do so by the MASH.

For further advice or information, contact:
Head of Communities and Community Safety (Designated Lead Officer) 0115 917 3492

APPENDIX C

Disclosure of Information from a Child

Abused children are more likely to disclose details of abuse to someone they trust and with whom they feel safe. By listening and taking seriously what the child is saying you are already helping the situation. The following points are a guide to help you respond appropriately.

Actions to be taken by the person being disclosed to include the following:

- React calmly so as not to frighten the child.
- Take what the child says seriously, recognising the difficulties inherent in interpreting what is being said by a person who may have a speech impairment or differences in language.
- Avoid asking direct questions other than those seeking to clarify your understanding of what the person has said. The Police or Adult and Children's Services may subsequently formally interview them and they should not have to repeat their account on several occasions.
- Inappropriate and excessive questioning at an early stage may also impede the conduct of a subsequent criminal investigation.
- Reassure the child but do not make promises of confidentiality that will not be feasible in the light of subsequent developments.
- Explain to them that you will have to share your concerns with agencies who have the authority to act.
- Tell them they were not to blame and that they were right to tell.
- Record in writing immediately all the details that you are aware of and what was said using the child's own words.
- Report the matter to your line manager immediately, who will then contact the Designated Lead Officer for advice where required and make a referral.

Actions to Avoid

The person receiving the disclosure should NOT:

- Dismiss the concern
- Panic
- Allow their shock or distaste to show
- Probe for more information than is comfortably offered – do not overpressure for a response
- Speculate or make assumptions
- Make negative comments about the alleged abuser
- Make promises or agree to keep secrets
- Suggest any action/s or consequences that may be undertaken in response to the disclosure.

APPENDIX D

Disclosure / Referral from a Member of The Public

If a member of the public contacts you with concerns about a child's welfare, you should advise them to act as follows:

- Contact Nottinghamshire Children's Social Care 0300 500 80 80
- Outside of office hours, call Nottinghamshire County Council's emergency duty team on 0300 456 4546
- If the situation is considered to be an emergency, contact the Police on 999 or 101
- You should also take the relevant details from the member of the public and pass these on to the Designated Lead Officer. That officer will update the database and contact MASH to check the referral has been made.

APPENDIX E

Members Guide to Reporting a Safeguarding Children Concern

In cases where Members become personally aware of a safeguarding children issue; they should report in the way outlined below:

- Contact Nottinghamshire Children's Social Care 0300 500 80 80 or complete the online form https://www.nottinghamshire.gov.uk/care/safeguarding/childrens-mash/report-a-new-concern-about-a-child

- Outside of office hours, call Nottinghamshire County Council's emergency duty team on 0300 456 4546
- If the situation is considered to be an emergency, contact the Police on 999 or 101
- The Councillor should then notify the Designated Lead Officer that they have made a referral to Nottinghamshire County Council and email the details to spc@broxtowe.gov.uk
- The Designated Lead Officer will update the database.

If the circumstances involve a relationship to services provided by Broxtowe Borough Council (for example Housing or Leisure), then the information should also be shared with the relevant Head of Service.

APPENDIX F

Concerns About an Employee or Member

If staff or Members have concerns about a fellow Officer or Councillor's conduct which they feel may be putting a child's safety or welfare at risk, they should implement the provisions of the Whistleblowing Policy. This can be accessed on the intranet (Document Index / HR Documents / Whistleblowing). If further guidance or information is required, this can be obtained from one of the Council's Human Resources Officers.

The Human Resources Manager will decide on the most appropriate course of action, which may include referral to Nottinghamshire County Council's Local Authority Designated Officer (LADO) for Safeguarding.

APPENDIX G

Supplementary Form to Report Concerns of Child Sexual Exploitation

Form available at: https://www.nottinghamshire.gov.uk/nscp/resources/for-professionals-and-volunteers

Alternatively, can be accessed on Broxtowe Borough Council intranet under Document Index / Corporate Documents / Safeguarding

Child Sexual Exploitation (CSE) Concerns Network Information Operation STRIVER

Please complete and submit this information sheet if you have concerns regarding CSE. This form should be used by you to identify information concerning people, places, activities, or vehicles which you believe may be involved with, or connected to CSE.

Please complete and submit this information sheet if you have concerns regarding a young person at risk of child sexual exploitation.

- **This is not a referral form and should not replace your usual practice of referring to social care, SEIU or CAIU**
- **Anything of immediate risk should be reported via 999 or 101 to the police control room**
- **This is an intelligence sharing form for LOW level non-emergency information**
- **Please be aware this inbox is monitored 24/7**

The information contained herein will be shared with Nottinghamshire Police to:

- **Develop disruption strategies to be implemented by a multi-agency panel**
- **Collate intelligence concerned with children and young people exposed to or at risk of CSE**
- **Inform current/future investigations concerning the sexual exploitation of children and young people**

Summary of concern: (Please give a brief account of the information), for example; Names of perpetrators (including nicknames), addresses of interest, areas, locations, Vehicles (registration, colour, make ect..), Patterns of behaviour (connecting either YP/Perpetrators), hotels, parks, shops takeaways ect….

Please be <u>SPECIFIC</u>

<u>Please provide details of any child/young person or adults involved (if known):</u>

NAME (including nick names/pseudonyms)	DOB	V/S (Victim/ Suspect)	M/ F	Address	Are other agencies involved if so who

Your Details	
Name	
Agency	
Contact Telephone number	
Email address	

Have the police been notified about this matter: Y/N

If yes, please provide incident number/details/date:

Please email completed information sheet to Lisa Hurst

cnm@nottinghamshire.pnn.police.uk

If you believe the child or young person you have identified above is at risk of CSE, please identify which of the risk indicators you think apply: (If there are High level indicators, discuss with your manager and any safeguarding issues should be referred to social care).

Low Level Risk Indicators

☐ Frequently returning home late and or going missing
☐ Overt inappropriate and sexualised clothing
☐ Sexualised risk taking behaviour, including internet use
☐ Unaccounted for/unexplained monies or goods
☐ Associating with adults (unknown or identified as risky), or other sexually exploited children or YP
☐ Lack of or infrequent contact with family, friends or other support networks
☐ Sexually transmitted infections
☐ Experimenting with drugs and/or alcohol
☐ Low self-esteem, poor self- image, eating disorders and/or self-harm

Medium Level Indicators

☐ Getting into cars with unknown adults
☐ Associating adults known to be/have been involved in CSE
☐ Being groomed on the internet
☐ ”Clipping” i.e. offering sex for money or other payment, but running away before sex takes place
☐ Disclosing a physical assault without sufficient evidence to support a S47 enquiry and later refusing to make or withdrawing a complaint
☐ Involved in CSE e.g. being seen in known houses, recruiting grounds or other “hot spots”
☐ Having an older boyfriend/girlfriend
☐ Poor school attendance or excluded
☐ Staying out overnight without explanation and or details of whereabouts
☐ Breakdown of residential placements due to behaviour
☐ Unaccounted for/unexplained money or goods, e.g. including mobile phones, drugs and alcohol
☐ Multiple or frequent sexually transmitted infections
☐ Episodes of self-harming requiring medical treatment
☐ Repeat offending
☐ Gang member or association with gangs

High Level Indicators

☐ Child under 13 engaging in sexual activity
☐ Episodes of street homelessness, or staying with adults believed to be sexually exploiting them/other YP
☐ Child under 16 meeting different adults and exchanging or selling sexual activity
☐ Found in and removed from known ‘red light’ district by professionals, due to suspected CSE
☐ Being taken to clubs and hotels by adults and engaging in sexual activity
☐ Disclosure of serious sexual assault and then withdrawal of statement
☐ Abduction and forced imprisonment
☐ Being moved around for sexual activity
☐ Disappearing from the ‘system’ with no contact or support
☐ Being bought/sold/trafficked
☐ Multiple miscarriages or terminations
☐ Indicators of CSE in conjunction with chronic alcohol and drug use
☐ Indicators of CSE alongside serious self-harming
☐ Receiving rewards of money or goods for recruiting peers into CSE.

APPENDIX H

Example Policy Statement and Procedure Template For Voluntary Organisations

Voluntary organisations are free to use all or any sections of the Safeguarding Children Policy. Below is the minimum acceptable for any organisation receiving funding from Broxtowe Borough Council. However, it is important that all organisations know and understand their duties and obligations, whether they use the template or not.

Policy Statement
Children have the right to participate, have fun and be safe in the services provided for them and the activities they choose, or their parents/carers choose for them.

(Name of organisation) is committed to safeguarding children and protecting them from abuse when they are engaged in services organised and provided by *(name of organisation).* We will endeavour to keep children, young people and vulnerable adults safe from abuse. Any suspicion of abuse will be responded to promptly and appropriately. We will act in the best interest of the child at all times. We will proactively seek to promote the welfare and protection of all children, young people and vulnerable adults.

(Name of organisation) will ensure that unsuitable people are prevented from working with children through using safe recruitment and selection processes.

(Name of organisation) will take any concern made by a service user, employee, volunteer or child/vulnerable adult seriously and sensitively. Concerns cannot be anonymous and should be made in the knowledge that, during the course of any enquiries, the agency that made that referral will be made clear.

(Name of organisation) will not tolerate harassment of any service user, employee, volunteer or child/vulnerable adult who raises concerns of abuse.

Procedure
Any concerns will be brought to the attention of *(named senior person)* who will refer the matter to the Nottinghamshire Multi Agency Safeguarding Hub (MASH). Those raising the concern must be made aware that the concern will be shared with appropriate people but will be treated in confidence as far as possible. Officers, staff and volunteers must not discuss the concern except with the designated officer and any agent of the organisation responsible for investigating the concern.

APPENDIX I

Guidelines For Conduct When Working/Having Contact with Children

It is best practice for Members, staff and contractors who have contact with children, young people or vulnerable adults to follow these guidelines
.

- Always be publicly open to scrutiny when working with children.
- Avoid situations where a councillor, employee, volunteer or service provider and a child are alone, unobserved.
- Children have a right to privacy, respect and dignity. Respect the child and provide a safe and positive environment.
- All children should be treated equally in the context of any activity.
- members, staff and contractors must put the wellbeing and safety
- of the child before the development of performance.

- If a child is accidentally injured as the result of a councillor, employee or contracted service provider's actions; seems distressed in any way; appears to be sexually aroused by your actions; misunderstands or misinterprets something you have done; always report such incidents as soon as possible to your line manager and the Designated Lead Officer or the Designated Lead Officer and make a written report.
- If a child arrives at an activity or service showing signs or symptoms that give you cause for concern, you must act appropriately following the procedures outlined above in the policy.
- When administering first aid, staff should ensure that another adult
- is present where possible, or is aware of the action being taken.
- Parents/carers should always be informed when first aid is administered.

NEVER take children to your home where they will be alone with you.
NEVER engage in rough physical games including horseplay.
NEVER engage in sexually provocative games.
NEVER allow, encourage or engage in inappropriate touching of any form.
NEVER allow children to use language inappropriate to the circumstances unchallenged, or use it yourself.
NEVER make sexually suggestive comments about, or to, a child - even in fun.
NEVER let an allegation a child makes be ignored or unrecorded.
NEVER do things of a personal nature for children that they can do for themselves, for example assist with changing. It may sometimes be necessary to do things of a personal nature for children, particularly if they are very young or are disabled. These tasks should only be carried out with the full understanding and consent of parents/carers. In an emergency situation that requires this type of help, you should endeavour to have someone else present and inform the parents/carers as soon as is reasonably possible.
NEVER share a room with a child.
NEVER enter areas designated only for the opposite sex.
NEVER use the internet or any other electronic or telephone device to access inappropriate images of children.

APPENDIX J

CONTACTS

Multi Agency Safeguarding Hub (MASH)

Monday to Thursday 8.30am to 5.00pm
Friday 8.30am to 4.30pm
Tel: 0300 500 80 90
E mail: mash.safeguarding@nottscc.gov.uk

Postal address:
MASH,
Piazza,
Little Oak Drive,
Sherwood Business Park,
Annesley,

Nottinghamshire
NG15 0DR

Social Services Emergency Duty Team
Tel: 0300 456 4546

Police
Tel: 999 (emergencies)
101 (non-emergencies)

Nottinghamshire County Council Children's Social Services
Broxtowe Team Office
Tel. 0115 917 5920

Broxtowe Borough Council
Safeguarding Children Designated Lead Officer
Head of Communities and Community Safety
Tel 0115 917 3492
spc@broxtowe.gov.uk

Human Resources Manager
Tel 0115 917 3552

APPENDIX K

Signs of Child Abuse

Child abuse is grouped into four main categories:
- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Individual factors or indicators of abuse may not be particularly worrying in isolation, but in combination they can suggest that there is a serious cause for concern.

Identification of child abuse is difficult. The indicators below are not an exhaustive list but should prompt consideration of whether child abuse may be taking place.

Physical Abuse
Bruises:
- in children who are not independently mobile
- in babies should always be referred to Children's Social Care
- that are seen away from bony prominences
- to the face, back, abdomen, arms, buttocks, ears and hands
- multiple in clusters
- multiple or uniform shape

- that carry an imprint – of an implement or cord
- with petechiae (dots of blood under the skin) around them.

Bites:
• Differentiating between adult/child bite on size requires a specialist dentist. If an adult is suspected of biting a child a referral should always be made.

Burns or scalds:
- with clear outlines which may match an implement
- that are multiple in nature
- on the body away from the hand eg back, shoulders or buttocks
- small round which may be from cigarettes

Scars:
• multiple, unusual shapes or that suggest a child did not receive appropriate medical treatment.

Fractures:
- in children under 18 months
- in children that are inconsistent with developmental stage
- alleged unnoticed fractures – fractures cause pain and it would be difficult for a carer to be unaware.

Other injuries:
- Poisoning, injections, ingestion or other applications of damaging substances (including drugs and alcohol).
- Signs of shaking: may present with unexplained pain, fitting, paralysis, extreme irritability or with less obvious signs, such as increased head circumference, poor feeding, excessive crying, vomiting or associated injury. Excessive crying in babies can be difficult to manage and may make them more vulnerable to inflicted brain injury.
- Female genital mutilation, including female circumcision is abuse and should be reported. If a woman has been circumcised any female children in the family are at increased risk and should be assessed appropriately.

Emotional Abuse
- Persistently telling a child they are worthless or unloved
- Bullying a child or frequently making them frightened
- Persistently ridiculing, making fun of or criticising a child
- Persistently shouting, screaming or swearing
- Abnormally passive, lethargic or attention seeking behaviour
- Specific habit disorders eg. faecal smearing, excessive drinking, eating unusual substances, and self-harm
- Severely delayed social development, poor language and speech development not otherwise explained
- Excessively nervous behaviour such as rocking or hair twisting
- Low self-esteem

Sexual Abuse

- Recurrent genital or anal symptom (for example, bleeding or discharge) without a medical explanation
- Genital, anal or perianal injury without a suitable explanation
- Anal fissure, without medical explanation
- Unusual sexualised behaviours in a pre-pubertal child
- Pregnancy or sexually transmitted infection, including anogenital warts, in a child younger than 13 years if there is no clear evidence of vertical transmission or blood
- contamination. In 13-15yr if no disclosure of consenting sexual behaviour with a peer. In 16-17yr consider if power imbalance in relationship, sexual exploitation.

Neglect

- Ignoring the child's need to interact
- Failing to express positive feelings to the child, constant shouting and swearing at the child, showing no emotion in interactions with the child
- Denying the child opportunities for interacting and communication with peers or adults
- Inadequate provision of food
- Exposure to inadequate, dirty and/or cold environments
- Abandoned or left in circumstances without appropriate adult supervision which are likely to endanger them
- Prevented by their carers from receiving appropriate medical advice or treatment
- Living environment unsafe for child's developmental stage
- Poor standard of hygiene affecting child's health.

Type of abuse	Physical Indicators	Behavioural Indicator
Physical	Frequent or unexplained bruising, marks or injury Bruises which reflect hand marks or shapes of articles e.g. belts Cigarette burns Bite marks Unexplained broken or fractured bones Scalds	Fear of parent being contacted Behavioural extremes – aggressive/angry outbursts/ withdrawn or violent behaviour Fear of going home Flinching when approached or touched Depression Keeping arms/legs covered Reluctance to change clothes Panics in response to pain Reports injury caused by parents
Emotional	Delays in physical development or progress Sudden speech disorders Failure to thrive	Neurotic behaviour Sleeping disorders, unable to play Fear of making mistakes Sucking, biting or rocking Inappropriately adult or infant Impairment of intellectual, emotional, social or behavioural development

Sexual	Pain/itching in the genital area Bruising/bleeding near genital area Sexually transmitted disease Vaginal discharge/infection Frequent unexplained abdominal pains Discomfort when walking/sitting Bed wetting Excessive crying	Inappropriate sexual behaviour or knowledge for the child's age Promiscuity Sudden changes in behaviour Running away from home Emotional withdrawal through lack of trust in adults Unexplained sources of money or 'gifts' Inappropriate sexually explicit drawings or stories Bedwetting or soiling Overeating or anorexia Sleep disturbances Secrets which cannot be told Substance/drug misuse
Neglect	Constant hunger Poor hygiene Weight loss/underweight Inappropriate dress Consistent lack of supervision/abandonment Unattended physical problems or medical needs	Begging/stealing food Truancy/late for school Constantly tired/listless Regularly alone/unsupervised Poor relationship with care giver

Change Table

Policy Section	Suggested Change	Reason for Change
Title Page	Change of Dates	Updated policy
Throughout the document	REPLACE Head of Communities and Community Safety with Designated Lead Officer	POWG request
P 3 para 3	ADD Councillors and including those contracted	Completeness
P3 para 5	REPLACE hyperlink	Hyperlink broken
P4 2.0	ADD Councillors	Completeness
P4 2.0	ADD Police vetting	Completeness
P8 5.0	Remove numbers to subsections	POWG request
P8 Homelessness	ADDThe Council has a duty to house care leavers who are 16-25 years of age. Where they are found to be intentionally homeless Senior Officers from the Council will meet to resolve the case. In exceptional circumstances where this is not achievable a Senior Officer and Social Care must meet within a few days to resolve the situation. There is a care leavers team in place to assist care leavers using the care leavers pathway	Change in legislation
P8 Homelessness	ADD “the same day where possible” Even where their duty is discharged Housing ensure the family are housed whilst this process is undertaken.	

P10 Information Sharing	Add Information sharing between the Council and agencies such as the Police, Probation, Victim Care etc in Nottinghamshire is done through the secure information sharing system Empowering Communities with Integrated Network Systems (ECINS).	Completeness
Policy Section	**Suggested Change**	**Reason for Change**
P11 Appendix A4.	ADD Report a new concern about a child | Nottinghamshire County Council	Completeness
P11 Appendix A5.	AMEND will to MUST	Improve reporting

Appendix 3

Safeguarding Data 2024

Adult Safeguarding Referrals			
TYPE	**2022 (Adult and Children)**	**2023 (Adult and Children)**	**2024 (Adult only)**
Threats to Suicide	8	13	24
Mental Health	4	4	22
Domestic Abuse	1	0	1
Physical Abuse	6	2	4
Financial Abuse	1	3	4
Neglect/Self Neglect	3	5	4
Sexual Abuse	4	1	1
Debt	0	0	0
Hoarding	2	4	4
Learning Disability	1	0	0
Emotional Abuse	3	0	0
Dementia	3	3	0
Organisational Abuse	0	2	0
Alcohol misuse	0	2	0
Drugs	0	0	0
Housing	0	4	7
Honour Based	0	1	0
Access to Food	0	0	15
Missing with children	0	0	1
Hate Crime	0	0	1
Trafficking/Modern Slavery	0	0	2
Total	**36**	**44**	**70 (20 individuals referred for 2 reasons)**

TYPE	2024 (Children only)
Physical Abuse	1
Neglect	9
Suspected parental abduction	3
Access to Food	2
Total	**13 (2 individuals referred for 2 reasons)**

Complex Case Panel Referrals 2023				
	2023	**Types**	**2024**	**Types**
January	3	Hoarding, ASB, Mental Health, Threats to Kill	11	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide
February	3	Hoarding, ASB, Mental Health, Threats to Kill	16	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health,
March	3	Hoarding, ASB, Mental Health, Threats to Kill	16	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing
April	4	Hoarding, ASB, Mental Health, Threats to Kill	16	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB
May	3	Hoarding, ASB, Mental Health, Threats to Kill	16	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health
June	3	Hoarding, ASB, Mental Health, Threats to Kill	16	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health, Coercive controlling behaviour and Sexual abuse.
July	12	Hoarding, ASB, Mental Health, Threats to Kill, PTSD, Physical Abuse, Threats to Suicide, Living Conditions	17	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health, Coercive controlling behaviour and Sexual abuse, Rape, Sexual Assault, Modern Slavery, Self-Neglect,
August	No Meeting	No Meeting	No Meeting	No Meeting
September	18	Hoarding, ASB, Mental Health, Threats to Kill, PTSD, Physical Abuse, Threats to Suicide, Living Conditions, Physical	9	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial,

		Disability, Neglect, Dementia, Alcohol Abuse, Missing Children		Health, Coercive controlling behaviour and Sexual abuse, Rape, Sexual Assault, Modern Slavery, Self-Neglect, Cuckooing,
October	10	Hoarding, ASB, Mental Health, Threats to Kill, PTSD, Physical Abuse, Threats to Suicide, Living Conditions, Physical Disability, Neglect, Dementia, Alcohol Abuse,	11	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health, Coercive controlling behaviour and Sexual abuse, Rape, Sexual Assault, Modern Slavery, Self-Neglect, Cuckooing
November	10	Hoarding, ASB, Mental Health, Threats to Kill, PTSD, Physical Abuse, Threats to Suicide, Living Conditions, Physical Disability, Neglect, Dementia, Alcohol Abuse,	10	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health, Coercive controlling behaviour and Sexual abuse, Rape, Sexual Assault, Modern Slavery, Self-Neglect, Cuckooing
December	11	Hoarding, ASB, Mental Health, Threats to Kill, PTSD, Physical Abuse, Threats to Suicide, Living Conditions, Physical Disability, Neglect, Dementia, Alcohol Abuse, Financial Abuse	10	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health, Coercive controlling behaviour and Sexual abuse, Rape, Sexual Assault, Modern Slavery, Self-Neglect, Cuckooing

The most common reason for referral and ongoing panel inclusion is None-Engagement with services.

Children Discussed at Panel				
	Child Criminal Exploitation Panel		Local Neighbourhood Safeguarding and Disruption Panel	
	2023	2024	2023	2024
January	0	0	1	5
February	0	0	2	6
March	0	1	2	5
April	0	1	2	7
May	1	1	3	5
June	1	1	3	7
July	1	1	6	7
August	1	1	3	5
September	0	1	4	7
October	0	1	3	8
November	0	1	3	5
December	0	1	2	6

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Appendix 4

Equality Impact Assessment

The Equality Act 2010 replaces the previous anti-discrimination laws with a single Act. It simplifies the law, removing inconsistencies and making it easier for people to understand and comply with it. It also strengthens the law in important ways, to help tackle discrimination and equality. The majority of the Act came into force on 1 October 2010.

Public bodies are required in it to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited under the Act
- advance equality of opportunity between people who share a protected characteristic and people who do not share it, and
- foster good relations between people who share a protected characteristic and people who do not share it.

The public sector Equality Duty came into force on 5 April 2011. The duty ensures that all public bodies play their part in making society fairer by tackling discrimination and providing equality of opportunity for all. It ensures that public bodies consider the needs of all individuals in their day to day work – in shaping policy, delivering services and in relation to their own employees.

The Equality Duty encourages public bodies to understand how different people will be affected by their activities so that policies and services are appropriate and accessible to all and meet different people's needs. By understanding the effect of their activities on different people, and how inclusive public services can support and open up people's opportunities, public bodies are better placed to deliver policies and services that are efficient and effective.

The new equality duty replaces the three previous public sector equality duties, for race, disability and gender. The new equality duty covers the following protected characteristics:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race – this includes ethnic or national origins, colour or nationality
- religion or belief – including lack of belief
- sex
- sexual orientation.

It also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

The Council has also decided to treat people who have care experience as if they had a protected characteristic under the law.

Having due regard means consciously thinking about the three aims of the equality duty as part of the process of decision-making. This means that consideration of equality issues must influence the decisions reached by public bodies, including how they act as employers, how they develop, evaluate and review policies, how they design, deliver and evaluate services, and how they commission and procure from others.

Having due regard to the need to advance equality of opportunity involves considering the need to:

- remove or minimise disadvantages suffered by people due to their protected characteristics
- meet the needs of people with protected characteristics, and
- encourage people with protected characteristics to participate in public life or in other activities where their participation is low.

Fostering good relations involves tackling prejudice and promoting understanding between people who share a protected characteristic and others.

Complying with the equality duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive action provisions in order to provide a service in a way which is appropriate for people who share a protected characteristic.

The Equality Duty also explicitly recognises that disabled people's needs may be different from those of non-disabled people. Public bodies should therefore take account of disabled people's impairments when making decisions about policies or services. This might mean making reasonable adjustments or treating disabled people better than non-disabled people in order to meet their needs.

There is no explicit requirement to refer to the Equality Duty in recording the process of consideration but it is good practice to do so. Keeping a record of how decisions were reached will help public bodies demonstrate that they considered the aims of the Equality Duty. Keeping a record of how decisions were reached will help public bodies show how they considered the Equality Duty. Producing an Equality Impact Assessment after a decision has been reached will not achieve compliance with the Equality Duty.

It is recommended that assessments are carried out in respect of new or revised policies and that a copy of the assessment is included as an appendix to the report provided to the decision makers at the relevant Cabinet, Committee or Scrutiny meeting.

Where it is clear from initial consideration that a policy will not have any effect on equality for any of the protected characteristics, no further analysis or action is necessary.

Public bodies should take a proportionate approach when complying with the Equality Duty. In practice, this means giving greater consideration to the Equality Duty where a policy or function has the potential to have a discriminatory effect or impact on equality of opportunity, and less consideration where the potential effect on equality is slight. The Equality Duty requires public bodies to think about people's different needs and how these can be met.

EQUALITY IMPACT ASSESSMENT (EIA)

Directorate:	Chief Execs	Title of the Lead Officer responsible for EIA	Head of Communities and Community Safety
Name of the policy or function to be assessed:		Safeguarding Adults Policy 2025-28	
Title of the Officer undertaking the assessment:		Head of Communities and Community Safety	
Is this a new or an existing policy or function?		Existing Policy	

1. What are the aims and objectives of the policy or function?

This policy sets out the Council's commitment to safeguarding adults who are at risk and how it will meet its moral and statutory obligations through decision making, service delivery, and other appropriate actions and developments.

Broxtowe Borough Council's (the Council's) Vision for Broxtowe is "A greener, safer, healthier Broxtowe, where everyone prospers"

The Council's corporate priority for Community Safety is *"*A safe place for everyone*"*

2. What outcomes do you want to achieve from the policy or function?

Implement and maintain systems of working practice to safeguard vulnerable children during council activities

To fully assist Nottinghamshire County Council and other relevant agencies in the safeguarding and promotion of the welfare of children who are experiencing, or at risk of, child criminal exploitation, child sexual exploitation, abuse or neglect.

To develop and implement appropriate procedures to ensure the well-being of children in need of safeguarding to protect them from harm.

To provide employees, Councillors and volunteers (working on behalf of Broxtowe BC) with training, guidance and support to assist them in recognising and responding to indicators of possible abuse or neglect.

Directorate:	Chief Execs	Title of the Lead Officer responsible for EIA	Head of Communities and Community Safety

To ensure that all employees working with children with care and support needs can identify the signs and symptoms of the ten types of neglect and abuse.

To ensure that all employees understand and follow the relevant procedures when they have concerns about children experiencing or at risk of abuse or neglect.

To ensure that any appropriate Disclosure and Barring Service (DBS) checks are completed, as determined by Broxtowe Borough Council's Recruitment and Selection Policy, for employees that work with, or have significant access to, adults at risk of child criminal exploitation, child sexual exploitation, abuse or neglect.

To facilitate the Neighbourhood Safeguarding and Disruption Panel, in Broxtowe. This is a multi-agency forum which meets to share intelligence on known children at risk to ensure all appropriate help and support can be provided.

To refer to and participate in Child Criminal Exploitation Panel, the Multi Agency Sexual Exploitation Panel and Child in need Conferences. These are a multi-agency forums which meet to share intelligence on known children at risk to ensure all appropriate help and support can be provided.

3. Who is intended to benefit from the policy or function?

Children in the Borough who may be considered at risk of child criminal exploitation, child sexual exploitation, abuse or neglect.

4. Who are the main stakeholders in relation to the policy or function?

Children and parents who are residents of the borough; Broxtowe Borough Council staff, Nottinghamshire Safeguarding Children Partnership, Nottinghamshire County Council, Schools and relevant partner agencies, charities and organisations.

5. What baseline quantitative data do you have about the policy or function relating to the different equality strands?

In 2023/24 the numbers of children subject to a Child Protection Plan steadily reduced from 669 to 513. This is a significant reduction of just under 15%. Children's social care have been requesting fewer Initial Child Protection Conferences over the year – 123 in Q4 of 2022/23, compared to 73 in Q4 of 2023.

There is a statutory requirement on safeguarding partners to conduct a 'Rapid Review' when serious child safeguarding cases are identified. There have been four rapid reviews completed in Nottinghamshire in 23-24.

(Nottinghamshire Safeguarding Children Partnership Annual Report 2023-24)

Directorate:	Chief Execs	Title of the Lead Officer responsible for EIA	Head of Communities and Community Safety

6. What baseline qualitative data do you have about the policy or function relating to the different equality strands?

None available

7. What has stakeholder consultation, if carried out, revealed about the nature of the impact?

Not undertaken.

8. From the evidence available does the policy or function affect or have the potential to affect different equality groups in different ways? In assessing whether the policy or function adversely affects any particular group or presents an opportunity for promoting equality, consider the questions below in relation to each equality group:

Does the policy or function target or exclude a specific equality group or community? Does it affect some equality groups or communities differently? If yes, can this be justified?

The policy does not adversely affect any individual group.

Some of the issues highlighted in the Policy affect individual groups such as those involved in child exploitation. The targeting of this is wholly justified on the basis that it is illegal.

Is the policy or function likely to be equally accessed by all equality groups or communities? If no, can this be justified?

Yes

Are there barriers that might make access difficult or stop different equality groups or communities accessing the policy or function?

The only barrier which prevents access is where children are kept purposefully hidden from others in the community through parental decisions not to access services, children's early years or social settings such as play groups or to home school.

Could the policy or function promote or contribute to equality and good relations between different groups? If so, how?

It is anticipated that positively addressing the issue of safeguarding children will only be seen as beneficial.

What further evidence is needed to understand the impact on equality?

None

9. On the basis of the analysis above what actions, if any, will you need to take in respect of each of the equality strands?
Age: No further action required
Disability: No further action required
Gender: No further action required
Gender Reassignment: No further action required
Marriage and Civil Partnership: No further action required
Pregnancy and Maternity: No further action required
Race: No further action required
Religion and Belief: No further action required
Sexual Orientation: No further action required
Care Experience: No further action required

Executive Director: Ruth Hyde

I am satisfied with the results of this EIA. I undertake to review and monitor progress against the actions proposed in response to this impact assessment.

Signature: [redacted]

Cabinet **29 July 2025**

Report of the Portfolio Holder for Community Safety

Safeguarding Adults Policy 2025–28

1. Purpose of Report

To approve the Safeguarding Adults Policy 2025-28. This is in accordance with the Council's Corporate Priority of Community Safety – A Safe Place for Everyone.

2. Recommendation

Cabinet is asked RESOLVE that the Safeguarding Adults Policy 2025-28 be approved.

3. Detail

The Care Act 2014 requires that an upper tier local authority must co-operate with each of its relevant partners, which in turn must co-operate with the upper tier local authority in relation to relevant functions, one of which is specifically stated as protecting adults with care and support needs who are currently experiencing or at risk of abuse or neglect. It is this part of the legislation which places the requirement on a District Council to act in cases of suspected neglect or abuse.

People who may need safeguarding are defined under Section 42 of the Care Act 2014 as adults (persons aged 18 or over) who:

- Have care and support needs;
- Are experiencing, or are at risk of abuse or neglect; and
- Because of their care and support needs cannot protect themselves against actual or potential abuse or neglect

As such, Broxtowe Borough Council is responsible for ensuring that employees are competent and confident in carrying out their responsibilities for safeguarding and promoting the welfare of adults. This includes ensuring employees are aware of how to recognise and respond to safeguarding concerns, including signs of possible abuse or neglect.

The Safeguarding Adults Policy 2025-28 sets out how Broxtowe Borough Council will meet its obligations. It is a revised version of the Safeguarding Adults Policy agreed by Community Safety Committee in November 2020.

The revised Safeguarding Adults Policy can be found at **Appendix 1**. The change table can be found at **Appendix 2**. The Safeguarding Adults Policy 2025-28 EIA can be found at **Appendix 3**.

4. Key Decision

   This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

   It is significant in terms of its effects on communities living or working in an area comprising two or more Wards or electoral divisions in the Council's area.

5. Updates from Scrutiny

   Policy Overview Working Group RECOMMENDED that the Safeguarding Adults Policy be approved at it's meeting on 5 June 2025.

6. Financial Implications

   The comments from the Assistant Director Finance Services were as follows:

   There are no additional financial implications to consider at this stage with ongoing business as usual activities being met within existing resources. Any significant budget implications in the future, over and above virement limits, would require approval by Cabinet.

7. Legal Implications

   The comments from the Monitoring Officer / Head of Legal Services were as follows:

   Section 42-47 of the Care Act 2014 sets out a clear legal framework with regards to how the Council should protect adults at risk of abuse and neglect. Section 5 of the policy sets out the statutory requirements from the Care Act 2014 and the 'Care and Support statutory guidance' (updated June 2020).

8. Human Resources Implications

   Not applicable.

9. Union Comments

   Not applicable.

10. Climate Change Implications

    Any climate change implications are contained within the report.

11. Data Protection Compliance Implications

    This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    As this is a change to policy / a new policy an equality impact assessment is included in the appendix to this report.

13. Background Papers

    Nil.

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Appendix 1

Broxtowe Borough COUNCIL

SAFEGUARDING ADULTS POLICY 2025 - 28

May June 2025

Section 1 Introduction

Section 2 Scope

Section 3 Policy aim

Section 4 Objectives

Section 5 Background

Section 6 Roles and responsibilities

Section 7 Corporate actions

Section 8 Dealing with incidents and concerns

Section 9 Other relevant issues

Appendix A Actions to be taken where potential abuse is disclosed or suspected
Appendix B Contacts
Appendix C Adult at Risk referral form
Appendix D Broxtowe Complex Case Panel Referral Form
Appendix E Types and possible indicators of abuse

"Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect"
(Chapter 14 of the Care and Support Statutory Guidance, Department of Health and Social Care 2016 – Updated 2020)

1.0 INTRODUCTION

1.1 This Policy has been produced to detail how Broxtowe Borough Council (the Council) will meet its duties and obligations with respect to adults at risk. It builds on numerous Government policies that reflect changes in the philosophy and language of adult health and social care.

It is part of this Council's ethos to want to serve everyone in our community so they can live happy, healthy, safe and fulfilled lives. Our Corporate Plan and other Policy documents outline how we do this in terms of service provision, improvement and community leadership.

1.2 Although the Council does not have primary responsibility for the role of safeguarding adults, as an organisation it does provide a range of services directly or indirectly for adults. It is through these services that our councillors, employees, contractors, partners and volunteers come into contact with adults on a regular basis. For example:

Council housing
Housing and council tax benefit
Disabled adaptations
Independent living
Tenancy and estates
Housing maintenance
Housing options
Leisure centres and recreation grounds
Environmental health
Communities and community safety

1.3 The Council has a statutory duty to assist Nottinghamshire County Council in making whatever enquiries it thinks necessary to enable it to decide if and what kind of action should be taken to protect an adult at risk from suspected abuse, neglect or exploitation (including financial and sexual exploitation). Employees from the Council must work closely with officers from Nottinghamshire County Council, who will follow-up on safeguarding concerns and determine the best course of action.

1.4 When delivering services in people's homes or at Council venues, proper systems must be in place to ensure that everyone is safe, particularly those who are less able to protect themselves. There is a need to be alert to signs of abuse and neglect and be prepared to raise concerns with Nottinghamshire County Council.

1.5 All those who come into contact with adults at risk in their everyday work, including employees who do not have a specific role in relation to adult safeguarding, have a duty to safeguard and promote the welfare and wellbeing of those adults. It is vital that every person who has contact with adults at risk should be able to recognise when such adults are, or may be, at risk of harm and to report all incidents or concerns they may have.

1.6 The adoption of a Safeguarding Adults Policy brings with it the requirement to regulate many of our services, including specific recruitment, selection, training and vetting procedures. This Policy highlights the need for ongoing training in safeguarding at all levels of the organisation so as to ensure that it is adhered to in a consistent manner.

2.0 SCOPE

2.1 This Policy covers all activities, areas and services provided by the Council and its agents, contractors or partners, and includes all Council employees, volunteers, agency workers, contractors and partners acting for and on behalf of the Council who encounter adults covered by the Policy whilst going about their daily duties. The Policy is also considered to be an appropriate reference guide for use by those councillors whose roles may involve them coming into contact with adults at risk.

2.2 This Policy aims to provide a brief introduction to the law in relation to safeguarding and offers practical guidance for best practice about safeguarding adults to all employees, partner agencies and other professionals working with the Council.

2.3 It highlights the main themes and issues in adult safeguarding, defines key terms, outlines some of the possible indicators of abuse, and recommends what action to take when dealing with a suspected or actual case of abuse against an adult at risk. It also includes a list of contacts of organisations which can provide help and support to both adults at risk and practitioners.

2.4 A detailed outline of procedures to follow when dealing with safeguarding concerns and disclosures is included at Appendix A.

2.5 This Policy complements the Council's Safeguarding Children Policy.

2.6 The Council has signed up to the Nottinghamshire Safeguarding Adults Board Multi-agency Safeguarding Vulnerable Adults Guidance. This Multi-agency Guidance is published by the Board on the web pages at;
https://www.nottinghamshire.gov.uk/care/safeguarding/mash
It covers all aspects of how to respond to concerns in relation to safeguarding adults and how to protect them and can be used in conjunction with this Policy document.

2.7 There is a link between some legislation, procedures and guidance which may mean there is a need to follow more than one process at the same time. Where an adult at risk**,** as defined later in this document, is subject to any of the following, the safeguarding adult at risk procedures in this Policy must be considered in addition to any other procedures:

- Domestic violence and abuse
- Modern slavery
- Honour based abuse, forced marriage, and female genital mutilation
- Hate crime and mate crime
- Cuckooing
- Anti-social behaviour
- Unlawfully depriving someone of their liberty
- Human trafficking
- Extreme radicalisation
- Violent extremism

Further information and contact details are contained in Section 9.0 below.

3.0 POLICY AIM

To enable Broxtowe Borough Council to meet the moral and legal responsibilities necessary to safeguard and promote the welfare of adults with care and support needs in order to keep them safe from abuse or neglect and to ensure the Council delivers the Safeguarding Duty.

4.0 OBJECTIVES

4.1 To achieve its aim, Broxtowe Borough Council has set the following objectives:

- Implement and maintain systems of working practice to safeguard vulnerable adults during council activities.
- To fully assist Nottinghamshire County Council and other relevant agencies in the safeguarding and promotion of the welfare of adults with care and support needs who are experiencing, or at risk of, abuse or neglect.
- To develop and implement appropriate procedures to ensure the well-being of adults in need of safeguarding to protect them from harm.
- To provide employees, councillors and volunteers (working on behalf of the Council) with training, guidance and support to assist them in recognising and responding to indicators of possible abuse or neglect
- To ensure that all employees working with adults with care and support needs can identify the signs and symptoms of the ten types of neglect and abuse
- To ensure that all employees understand and follow the relevant procedures when they have concerns about adult abuse or neglect.

- To ensure that any appropriate Disclosure and Barring Service (DBS) checks or Police Vetting are completed, as determined by the Council's Recruitment and Selection Policy, for employees that work with, or have significant access to, adults at risk of abuse or neglect.
- To facilitate the Complex Cases Panel in Broxtowe. This is a multi-agency forum which meets to share intelligence on known adults at risk and other adults who may be considered vulnerable (including medium risk victims of domestic violence and abuse), to ensure all appropriate help and support can be provided.

5.0 BACKGROUND

5.1 The Care Act 2014 and the Statutory Guidance

Although upper tier local authorities have been responsible for safeguarding adults for many years, there was never a clear set of laws behind it. As a result, it was often unclear in practice who was responsible for what. The Care Act 2014 aimed to put that right by creating a legal framework so key organisations and individuals with responsibilities for adult safeguarding could agree on how they must work together and what roles they must undertake to keep adults at risk safe.

5.2 When the Human Rights Act 1998 came into force in 2000, the Department of Health issued statutory guidance, called *No Secrets.* This provided guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse. This led, among other things, to local authority adult social services setting up safeguarding procedures to try and protect adults from abuse and neglect, and to deal with abuse when it occurred.

5.3 *No Secrets* has now been replaced and the new law on adult safeguarding, which was introduced by the Care Act 2014 (specifically in sections 42 to 46 and Schedule 2), is explained and elaborated in chapter 14 of the Care and Support Statutory Guidance 2016 (updated June 2020), which has been issued by the Department of Health & Social Care.

5.4 It is interesting to note that there has been a conscious shift away from the term "vulnerable adult" which was defined in *No Secrets* as:
"a person who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation". The word "vulnerable" is not used at all in the Care Act 2014, and is predominantly applied to a situation or a witness in the Statutory Guidance.

5.5 The 2014 legislation defines who may need safeguarding (Section 42), and also requires upper tier local authorities to set up a Safeguarding Adults Board (Section 43) and carry out Safeguarding Adult Reviews in certain circumstances (Section 44),

5.6 The Act also requires that an upper tier local authority must co-operate with each of its relevant partners, and each relevant partner must co-operate with the upper tier local authority in relation to relevant functions, one of which is specifically stated as protecting adults with care and support needs who are currently experiencing or at risk of abuse or neglect. It is this part of the legislation which places the requirement on a district council to act in cases of suspected neglect or abuse.

5.7 Who does the law set out to protect?

People who may need safeguarding are defined under section 42 of the Care Act 2014 as adults (persons aged 18 or over) who:

- have care and support needs
- are experiencing, or are at risk of abuse or neglect; and
- because of their care and support needs cannot protect themselves against actual or potential abuse or neglect.

5.8 What is abuse or neglect?

The Statutory Guidance states that local authorities should not limit their view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should always be considered; although the legal criteria at paragraph 5.7 above will need to be met before the issue is considered as a safeguarding concern. Exploitation, in particular, is a common theme in the following list of the types of abuse and neglect.

- Physical abuse – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- Domestic violence and abuse – including psychological, physical, sexual, financial, emotional abuse and so called 'honour' based abuse, such as forced marriage, and female genital mutilation.
- Sexual abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- Psychological abuse – including emotional abuse, 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 – including theft, fraud, cuckooing, 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 – including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.
- Organisational (Institutional) abuse – including 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 – 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 This covers a wide range of behaviour around neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

5.9 Other adults who may need assistance

It is recognised that some adults may not fit the legal definition of an "adult at risk", but for whatever reason, may be in a situation where they are not coping or are in need of support from statutory and/or other agencies. It is important therefore that such individuals are identified and any appropriate action taken. Any individual who is suspected of being in this category but may not be classified "at risk" should still be reported using the procedures in this Policy.

6.0 ROLES AND RESPONSIBILITIES

6.1 Nottinghamshire Safeguarding Adults Board

The Nottinghamshire Safeguarding Adults Board (NSAB) is made up of representatives from organisations including Nottinghamshire Police, Crown Prosecution Service, National Health Service, Local Councils and the Voluntary Sector. Its main responsibility is to ensure organisations work together to help adults who may have been abused and to help prevent adults being abused.

6.2 Elected Members

Elected members are responsible for the monitoring and review of this Policy, as well as adhering to best practice, participating in relevant training and reporting any disclosure, concern, incident or allegation to the Head of Public Protection or the Chief Communities Officer at the Council.

6.3 General Management Team and Heads of Service

The General Management Team, led by the Chief Executive, will lead the authority with regard to safeguarding adult responsibilities. The General Management Team in conjunction with Heads of Service/Assistant Directors,

will ensure that this Policy and the associated procedures are properly implemented to ensure the Council's duties and responsibilities with respect to safeguarding adults are properly discharged. In particular, Heads of Service whose areas of work are heavily involved with adults who may become "at risk" (for example, Housing Services) will ensure that appropriate extra training is provided for relevant employees, as well as developing and implementing appropriate procedures to ensure the wellbeing of adults in need of safeguarding to protect them from harm.

6.4 Designated Lead Officer

The Council has a Designated Lead Officer to ensure all reports of abuse or allegations against employees are dealt with promptly in accordance with this Policy and the Joint Nottingham and Nottinghamshire Multi-agency Safeguarding Procedure for Raising a Concern.

The Designated Lead Officer is responsible for:

- Writing, reviewing, and implementing the Council's Safeguarding Adults Policy
- Reporting to General Management Team and Councillors on the number of referrals received, and any changes to Policy or guidance.
- Representing the Council on formal investigations into allegations of abuse led by Social Care Services
- Providing advice to employees on cases and on referral of relevant cases to the Multi Agency Safeguarding Hub (MASH), the Multi Agency Childrens Sexual Exploitation Panel (MASE), the Child Criminal Exploitation Panel (CCEP), the Neighbourhood Safeguarding and Diversionary Panel (NSD) the County Council Serious Case Reviews (SARs), the Complex Cases Panel (CCP), and / or other appropriate specialist agencies
- Administration of the Complex Cases Panel
- Taking appropriate action if Adult Social Care advise they will not action the referral
- Managing reporting forms and recording systems
- Working to assess and reduce risks in relation to safeguarding adults
- Raising awareness of safeguarding issues amongst employees
- Establishing and maintaining effective multi-agency working with Adult Social Care, the police, other district councils, the Nottinghamshire Safeguarding Adults Board and other relevant statutory and non-statutory agencies
- Identifying and providing for employees training needs
- Receiving referrals from agencies and departments for the Complex Cases Panel
- Assessing and approving legal applications to lay aside the Data Protection Act for referrals to the CCP where consent has not been forthcoming

6.5 Departmental Safeguarding Leads

Some departments within the Council (for example, Housing) will have designated Departmental Safeguarding Leads. Their role is to liaise with the Designated Lead Officer, as well as officers within their own division, on specific cases and general issues.

6.6 Human Resources Manager

The Human Resources Manager is responsible for ensuring safe recruitment and employment practices are in place in accordance with the Safeguarding Adults agenda and for ensuring that appropriate checks, in accordance with national guidance, are carried out on all employees who have regular contact with adults who are likely to be subject to abuse or neglect. The Human Resources Manager is also responsible for receiving and acting on all concerns of abuse allegedly being perpetrated by employees of the Council.

6.7 Learning and Development Officer

The Learning and Development Officer will be responsible for working with the Designated Lead Officer to develop and monitor suitable training for employees and Members.

6.8 All Employees

All employees have a responsibility to report any concerns about adults who they are concerned may be suffering from neglect or abuse to the Designated Lead Officer or to their line manager. Employees of the Council are not, however, responsible for deciding on subsequent action after making a report. All employees are responsible for participating in relevant training and in particular, will complete the e-learning package made available via the Broxtowe Learning Zone. For new Members or employees this will be a compulsory part of their induction and for other Officers, there will be a requirement to undertake refresher training on a three yearly basis.

6.9 Partner Organisations and Contractors

The Council requires that all its partner organisations and contractors who work with adults at risk have appropriate safeguarding policies and procedures in place which complement this document.
Officers responsible for negotiating and monitoring contracts are required to ensure that all contractors and partner organisations:

- have relevant policies and procedures in place
- have robust recruitment procedures in places
- train their employees appropriately
- have adequate and appropriate reporting procedures in place
- ensure safeguarding adults Policy requirements are never contravened.

6.10 Broxtowe Complex Cases Panel

This is a multi-agency panel, facilitated by the Council, which has the following objectives:

- Ensure agencies are aware of individuals considered to be in need of support but who may not meet the threshold for intervention by the MASH.

- Share information to increase the safety and well-being of vulnerable victims.
- Identify all support available and ensure agencies are tasked with providing support and signposting information.
- Ensure agencies are aware of the support and activity being provided, and any other agency involvement.
- Improve agency accountability.
- Review cases and agree additional actions that can be put in place by partners to protect such people.

7.0 ACTIONS

7.1 Sharing Information

The Council has signed up to share information in accordance with the Nottinghamshire Information Sharing Protocol. This is the overarching agreement which underpins information sharing between agencies in Nottinghamshire. The protocol and the Council's Information Governance Officer should be consulted where there is any concern as to whether or how to share information.

The Council stores and shares sensitive information on all vulnerable person and safeguarding cases through the Empowering Communities Inclusion and Neighbourhood Management System (E-CINs). E-CINs is a multinational multi agency secure information sharing system.

7.2 Recruitment

All employers must be alert to the possibility that any person may pose a risk of harm to an adult at risk. Employers of employees or volunteers who have access to adults at risk must guard against the potential abuse, through a rigorous selection process, Disclosure and Barring Service checks, supervision, training and ongoing awareness of employees' behaviour.
The Council has specific recruitment procedures in place to ensure that adults at risk are protected from potential harm. These include:

- Risk assessments of all posts
- Relevant job descriptions and person specifications being issued with an application form
- Qualifications and details of competence being requested and checked
- References being requested and followed up
- Relevant employees undergoing an enhanced Disclosure and Barring Service check or Police Vetting
- The Council's annual appraisal system and review procedure ensuring that posts and their responsibilities are regularly tracked.

7.3 Training and Support

Every new member or employee at the Council is given a brief introduction to safeguarding adults and children during their induction and is required to

complete e-learning courses. Further, more comprehensive safeguarding training, is available to all employees and can be organised through the Learning and Development Officer. All employees will undergo refresher training every three years.

The aim of the training is to make employees aware of:

- Their responsibility to act when concerns about an adult at risk arise
- The respective roles and responsibilities of the different professionals
- Ways to identify adults at risk
- Ways to recognise risks and situations where abuse might be occurring
- The appropriate way to accurately record facts, including concerns about abuse and neglect and actions taken as a result
- Appropriate inter-agency working

It will be the responsibility of each Head of Service to identify if any individuals or groups within their division require further training in any aspect of safeguarding adults and to arrange for this to be implemented.

8.0 DEALING WITH INCIDENTS AND CONCERNS

8.1 Identifying an Adult at Risk

An adult at risk is a person aged 18 or over who:

- has care and support needs;
- is experiencing, or is at risk of abuse or neglect; and
- because of their care and support needs cannot protect themselves against actual or potential abuse or neglect

An adult at risk may, therefore, be an individual who:

- is elderly, with poor health, a physical disability or cognitive impairment
- has a learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long-term illness/condition
- misuses substances or alcohol
- is unable to demonstrate the capacity to make a decision as defined by the Mental Capacity Act 2005 and is in need of care and support

8.2 Identifying Abuse and Neglect

Signs of abuse can often be difficult to detect. People with communication difficulties can be particularly at risk because they may not be able to alert others. Sometimes people may not even be aware that they are being abused, and this is especially likely if they have a cognitive impairment. Abusers may try to prevent access to the person they abuse. It is vital that employees who come into contact with people with care and support needs are able to identify abuse and recognise possible indicators.

People may be subjected to a number of different types of abuse, including physical, financial, sexual, psychological, discriminatory, institutional, professional, or acts of neglect. The list of possible indicators and examples of behaviour can be found in Appendix G but the list is not exhaustive. Employees must keep in mind that instances of anti-social behaviour, harassment, bullying and hate crime may feed into safeguarding concerns. Recording instances of the latter in full and dealing with them adequately when they arise will help to prevent cases and safeguarding concerns developing.

8.3 Specific procedures

The procedures for dealing with safeguarding incidents and concerns are listed in Appendix A of this Policy.

Allegations made by others, even where anonymous, must always be taken seriously and must not be assumed to be malicious in the first instance. Officers informed of a concern by a member of the public, employees, or colleague, must act in accordance with this Policy.

It is not the responsibility of employees to decide whether or not abuse has taken place. They have a duty to report concerns and must not assume someone else has. It is an employees' responsibility to act on any disclosures, suspicions, or allegations as follows:

- All employees are responsible for discussing any disclosure, suspicions or allegations immediately with their line manager or directly with the Designated Lead Officer
- Line managers are responsible for consulting the Designated Lead Officer.
- The Designated Lead Officer will then advise on the most appropriate referral pathway.
- In the absence of the Designated Lead Officer, the Line Manager is responsible for contacting MASH for advice by telephoning 0300 500 80 90. The Line Manager will then send the report to, and discuss the situation with, the Designated Lead Officer as soon as possible.
- In cases involving the Council's housing stock, the referrals should be discussed with the Retirement Living Manager or the Housing Operations Manager in the first instance.
- The Designated Lead Officer is responsible for logging all referrals.
- The Housing Operations Manager will follow the same process as set out in the appendices and ensure that the Designated Lead Officer is informed of any referrals and kept up to date.
- A brief guide for employees (Safeguarding Adults – Employees Guide) is available on the intranet under Corporate Documents / Safeguarding

9.0 OTHER RELEVANT ISSUES

9.1 Domestic violence and abuse

The Government definition of domestic violence and abuse is:
"any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality."
The abuse can encompass, but is not limited to:

- *psychological*
- *physical*
- *sexual*
- *financial*
- *emotional*

Controlling behaviour is: 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: 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.

The Government definition, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

The Council is committed to highlighting the issues of domestic abuse and working to reduce it and the problems it causes. To that end, the Council has signed up to the White Ribbon Campaign to help reduce male violence against women.

Domestic violence and abuse can be reported to Nottinghamshire Police on 101 (or 999 in an emergency). Further information and help is available from the following:

- Freephone Nottinghamshire 24 Hour Domestic and Sexual Abuse Helpline run by Juno Women's Aid - Tel: 0808 800 0340
- Broxtowe Women's Project – Tel: 01773 719111
- Midlands Women's Aid - Tel: 0774 8535 203
- Equation (guidance and support, including for men) - Tel: 0808 802 4040

9.2 Modern slavery

Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators.

The scale of modern slavery in the UK is significant. Modern slavery crimes are being committed across the country and there have been year on year increases in the number of victims identified.

Concerns about modern slavery can be reported using the form at https://www.gov.uk/government/collections/modern-slavery Alternatively, the Modern Slavery Helpline can be contacted on 0800 0121 700.

9.3 Honour-based abuse and forced marriage

There is no specific offence of "honour-based crime". It is an umbrella term to encompass various offences covered by existing legislation. Honour based abuse can be described as a collection of practices which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based crime may not always involve violence but includes psychological abuse, written or verbal threats, abusive phone calls, emails and messages. Crimes committed in the name of honour may include assaults, disfigurement, sexual assault and rape, forced marriage, dowry abuse, female genital mutilation, kidnap, false imprisonment and stalking. In the most extreme cases, people are killed because their actions are thought to be dishonourable.

It is a violation of human rights and may be a form of domestic and/or sexual violence. There can never be any honour or justification for abusing the human rights of others.

A forced marriage is a marriage conducted without the valid consent of one or both parties and where duress is a factor. Forced marriage is now a specific offence under s121 of the Anti-social Behaviour, Crime and Policing Act 2014. However, a clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether or not to accept the arrangement remains with the intended spouses. In forced marriages, one or both spouses do not consent to the marriage and some element of duress is involved. Duress includes both physical and emotional pressure.

Any concerns about honour-based abuse and / or forced marriage should be reported to the Police on 101 if it is not considered an emergency. In cases of emergency, ring 999.

9.4 Hate crime and mate crime

A hate crime is *'any criminal offence which is perceived, by the victim or any other person, to be motivated by a hostility or prejudice based on a person's difference or perceived difference'.*

A hate incident is *'any non-crime incident which is perceived, by the victim or any other person, to be motivated by a hostility or prejudice based on a person's difference or perceived difference'.*

Hate incidents can feel like crimes (although no crime has been committed) to those experiencing them. For example, a launderette refuses to let a member of the gypsy or travelling community use their facilities.

"Mate crime" is the relatively new term used for the phenomenon where vulnerable people (e.g. elderly people or those with learning disabilities) are befriended and then taken advantage of. Mate crime is not a nationally monitored category but is most likely to be included under disability hate crime.

Nottinghamshire Police define hate crime *as "any incident (which may or may not constitute a criminal offence) which is perceived by the victim or any other person as being motivated by prejudice or hate."* As such, all hate crime and hate incidents reported to the police in Nottinghamshire are given a crime number but are categorised separately.

Broxtowe Borough Council has a specific Hate Crime Policy

Any incident of hate crime should be reported to the Police on 101 (or 999 if an emergency). An online reporting facility called "True Vision" is available at http://www.report-it.org.uk/your_police_force This allows for the reporting of hate crimes online.

9.5 Anti-Social Behaviour

Anti-social behaviour is defined in the Anti-social Behaviour Crime and Policing Act 2014 as *"conduct that has caused, or is likely to cause, harassment, alarm or distress to any person".*

Examples of anti-social behaviour include:

- Nuisance, rowdy or inconsiderate neighbours
- Vandalism, graffiti and fly-posting
- Street drinking causing harassment, alarm or distress
- Environmental damage including littering, dumping of rubbish and abandonment of cars
- Prostitution related activity
- Begging and vagrancy
- Fireworks misuse

Local Authorities do not have the powers to deal with all types of ASB. Some are matters for the Police. In Nottinghamshire the Police, PCC and local authorities have worked to produce a protocol determining the types of ASB

which Councils will enforce to reduce “post code lottery” and assist residents in reporting.

The Council has its own separate Anti-Social Behaviour Policy.

Concerns about anti-social behaviour should be referred to the Police on 101. If the situation is considered an emergency, ring 999.

9.6 Unlawfully depriving someone of their liberty

The Deprivation of Liberty Safeguards (DoLS) are part of the Mental Capacity Act 2005. They aim to make sure that people in care homes, hospitals and supported living are looked after in a way that does not inappropriately restrict their freedom. The safeguards should ensure that a care home, hospital or supported living arrangement only deprives someone of their liberty in a safe and correct way, and that this is only done when it is in the best interests of the person and there is no other way to look after them.

Any concerns in respect of potential deprivation of liberty should be reported to Nottinghamshire’s Deprivation of Liberty Standards Team on 0300 500 80 80 80.

9.7 Human trafficking

Trafficking involves the transportation of persons in the UK in order to exploit them by the use of force, violence, deception, intimidation, coercion or abuse of their vulnerability. The Council recognises that local authorities have specific responsibilities under the Council of Europe’s 2006 ‘Declaration on the Fight Against Trafficking of Human Beings’ to which the UK is a signatory. While trafficking mainly involves adults, children can be involved. Employees should discuss concerns they may have with the Designated Lead Officer. Also, the United Kingdom Human Trafficking Centre (UKHTC), now part of the National Crime Agency, is a national organisation that can provide advice. http://www.nationalcrimeagency.gov.uk/

9.8 Violent extremism

The United Kingdom’s strategy for countering terrorism is known as CONTEST.
The strategy involves many organisations and people working together across the UK and the world to protect the public.
The CONTEST Strategy has four key elements:

- Pursue - to stop terrorist attacks
- Prevent - to stop people becoming terrorists or supporting terrorism
- Protect - to strengthen our protection against terrorist attack
- Prepare - where an attack cannot be stopped, to lessen its impact.

The aim of Prevent is to stop people becoming or supporting terrorists or violent extremists, as well as supporting vulnerable members of our communities by helping to turn them away from violent extremism.

Prevent in Broxtowe is delivered in partnership with Nottinghamshire Police and a wide range of organisations. Together, these organisations recognise that the best long-term solution to preventing terrorism is to stop people becoming terrorists in the first place. The aim is to support local communities and institutions to challenge and reject the message of extremism.

As the UK faces a continuing threat from both international and domestic terrorism, no one is better placed than members of the public to notice extremist activity within their own community.
Violent extremist activity can be recognised in a variety of forms and just a few of them include:

- Giving out leaflets, displaying posters or distributing messages through social media that carry a violent extremist message
- Looking at violent extremist forums or websites, perhaps in internet cafes
- Extremist groups meeting in private or community centers
- Watching terrorist or violent extremist promotional videos.

If violent extremism is seen or suspected, it should be reported by phoning the confidential Anti-Terrorist Hotline on 0800 789 321 or email: Prevent@nottinghamshire.pnn.police.uk
For immediate threats, such as a suspicious package or vehicle **always call 999.**

APPENDIX A

ACTIONS TO TAKE WHERE POTENTIAL ABUSE OR NEGLECT IS DISCLOSED OR SUSPECTED

All relevant forms are available on the intranet at Document Index / Safeguarding

1. Action by members of the public

Any member of the public who contacts Broxtowe Borough Council with concerns should be advised that they must call Nottinghamshire County Council on **0300 500 80 80** or to complete the online form at the address below as soon as possible to discuss those concerns. They can report anonymously.

Members of the public - report abuse or neglect | Nottinghamshire County Council

However, if their concerns relate to a case of hoarding, details should be recorded and passed on in accordance with Item 6 in this Appendix.

2. Action by Employees in cases of emergency

When you are first made aware of, or witness, a concern of abuse or neglect, your initial response must always be to the immediate health, safety and welfare of the adult at risk and anyone else at risk. Remember, this may include the alleged perpetrator.

In an emergency, you should contact the relevant emergency services (police, ambulance, and fire and rescue service) by dialling **999.**

Wherever possible, establish with the adult at risk the action they wish you to take, if their wish is for the incident not to be reported however this is **NOT** a course of action which can be taken. Do not question the alleged victim any more than you need to in order to clarify what possible abuse has taken place. Once the emergency services have been contacted, ensure that you inform the Council's Designated Lead Officer giving full details using the form at Appendix C as soon as possible.

All cases will be logged on a secure database by the Designated Lead Officer, along with details of relevant referrals and outcomes

3. Action by employees in cases of non-emergency where there is no direct involvement

It should be noted that in some circumstances, employees will have concerns about an adult but will not be in a position to speak with them. In these circumstances, the member of employees should carry out the following procedure:

Record all relevant details including

- Reason for concern
- Date, time and place of the incident or reason for concern
- Name and address of person
- D.O.B of person
- Appearance and behaviour of the adult at risk
- Any injuries observed
- Any other relevant information.

The matter should be discussed with a Line Manager or the Designated Lead Officer and the form at Appendix C should be completed and e-mailed to the Council's Designated Lead Officer spc@broxtowe.gov.uk The Designated Lead Officer will assess the situation and decide on the most appropriate course of action. This may be one or more of the following, however the list is not exhaustive:

- Advise that a referral to the Multi Agency Safeguarding Hub is made
- Advise that a referral to Nottinghamshire County Council is made
- Advise that a referral to another agency is made
- Advise that a referral to Broxtowe's Complex Cases Panel is made
- Request additional information to make a decision
- Take no action where there is insufficient information or grounds to take action.

All cases will be logged on a secure database by the Designated Lead Officer, along with details of relevant referrals and outcomes

4. Action by employees in cases where they become aware of potential abuse or neglect and are in a position to work with the adult at risk <u>OR</u> an adult discloses information

If the case is not an emergency, check with the adult at risk whether other agencies are aware of them. Clarify the situation, but do not conduct an investigation; Adult Social Care are responsible for this.

Provide the adult at risk with information about the safeguarding process and how it could help to make them safer.

Obtain the views of the adult at risk about what has happened and what they want done about it.

Do not make any promises in respect of actions which may be taken.

Do not promise confidentiality – in some cases, as outlined below, other agencies will need to be informed about the situation, even if you have not been able to obtain the adult at risk's consent to do so.

If the adult at risk refuses to consent to the information being shared, this can be over-ridden if:

- the case is very high risk
- there is coercion involved
- there are other individuals at risk (including other adults at risk or children)
- the alleged abuser is an adult at risk
- the victim appears to lack the mental capacity to act. If the adult at risk does not have the capacity to make decisions for themselves, any actions taken or decisions made on their behalf must be made in their best interests
- a serious crime has been committed
- employees are implicated (in which case the information will only be shared with the Human Resources Team).

Explain that you have a duty to tell your manager or other designated person, and that their concerns may be shared with others who could have a part to play in safeguarding them;

Reassure them that they will be involved in decisions about what will happen; Explain that you will try to take steps to protect them from further abuse or neglect;

If they have specific communication needs, provide support and information in a way that is most appropriate to them;

Do not be judgemental or jump to conclusions;

Do not discuss the concern with the person alleged to have caused harm or anyone else, unless the immediate welfare of the adult at risk makes this unavoidable (or you are Whistleblowing – see 5 below).

Make an accurate record at the time, or immediately after, including:

- Name, address, date of birth (if known), gender.
- Details of person's General Practitioner (if known)
- Date, time and place of the incident
- Exactly what the adult at risk said, using their own words (their account) about the abuse and how it occurred or exactly what has been reported to you
- Appearance and behaviour of the adult at risk
- Any injuries observed
- Name and signature of the person making the record
- If you witnessed the incident, write down exactly what you saw.

It is vital that a written record of any incident or allegation of crime is made as soon as possible after the information is obtained, and made available to the referrer. Written records must reflect, as accurately as possible, what was said and done by the people initially involved in the incident either as a victim, alleged perpetrator or potential witness. The notes must be kept safe as it may be necessary to make records available as evidence and to disclose them to a court.

If the person is not living in in a property owned by Broxtowe Borough Council, the officer should complete an Adults at Risk Check list (Appendix C) to assist in collecting the information needed for a referral. Where advice is required the officer should contact the Designated Lead Officer or email the request to spc@broxtowe.gov.uk attaching the completed form and any other supporting information. The Designated Lead Officer will review the information and advise on the most appropriate course of action. This may be one or more of the following, however the list is not exhaustive:

- Advise to make a referral to the Multi Agency Safeguarding Hub
- Advise to make a referral to Nottinghamshire County Council Social Services
- Advise to make a referral to another agency
- Advise to make a referral to Broxtowe's Complex Cases Panel
- Advise to request additional information
- Take no action where there is insufficient information or grounds to take action

If the person is living in a property owned by Broxtowe Borough Council, the officer should complete an Adults at Risk Referral Form (Appendix C) and forward this to the Independent Living Manager at hlc@broxtowe.gov.uk who will decide on and take the most appropriate course of action. This may be one or more of the following, however the list is not exhaustive:

- Make a referral to the Multi Agency Safeguarding Hub
- Make a referral to Nottinghamshire County Council Social Services
- Make a referral to another agency
- Make a referral to Broxtowe's Complex Cases Panel

The Independent Living Manager will then ensure the details are passed to the Designated Lead Officer who will log all cases on a secure database.

If employees are unsure about how to handle the case, they should contact the Designated Lead Officer, on Ext 3492.

If the Designated Lead Officer is unavailable, children are involved, or located at the scene of suspected abuse, the matter should be reported directly to the Multi Agency Safeguarding Hub (MASH).

5 Allegations Against Employees

Adults at risk are particularly vulnerable to the actions of employees who wilfully or otherwise disregard legislative guidance or regulations, local Safeguarding Board decisions or Borough Council guidance and policy. Every individual has a responsibility for raising concerns about unacceptable practice or behaviour, including when a colleague is the source of concern. If this is the case, the procedure in the Council's Whistleblowing Policy should be followed. Further advice can be obtained from the Council's Human Resources Manager on Ext 3552.

Employees should voice their concerns, suspicions or uneasiness as soon as they feel they can. The earlier a concern is expressed, the easier and sooner action can be taken.

6 Cases of hoarding

Cases of hoarding should be referred by e-mail to the Senior Private Sector Housing Officer at health@broxtowe.gov.uk if the adult is a private tenant or an owner occupier, or to the Housing Operations Manager at hlc@broxtowe.gov.uk if the adult is a council tenant. These officers will take appropriate action under the agreed Hoarding Protocol, as well as advising the Council's Designated Lead Officer.

7 Referrals straight to the Complex Cases Panel

Some employees will be more familiar with details of procedures than others and be fully aware of when a referral should go straight to the Complex Cases Panel as it is not a safeguarding issue. In such cases, the Complex Cases Panel referral form (Appendix D) should be completed and forwarded to the Retirement Living Manager or Tenancy and Estates Manager in Housing if it involves a Broxtowe Borough Council owned property and to the Designated Lead Officer in other cases.

APPENDIX B

CONTACTS

Multi Agency Safeguarding Hub (MASH)

Monday to Thursday 8.30am to 5.00pm
Friday 8.30am to 4.30pm
Tel: 0300 500 80 90
E mail: mash.safeguarding@nottscc.gov.uk

Postal address:
MASH,
Piazza,
Little Oak Drive,
Sherwood Business Park,
Annesley,
Nottinghamshire
NG15 0DR

Nottinghamshire County Council Referrals

0300 500 80 80

Police

Tel: 999 (emergencies)
101 (non-emergencies)

Broxtowe Borough Council

Safeguarding Adults Designated Lead Officer
Head of Communities and Community Safety
Tel 0115 917 3492

Human Resources Manager
Tel 0115 917 3552

APPENDIX C

Adult at Risk Check List

This pro forma is to assist you in gathering all of the relevant details prior to making a referral. If answers to any of the questions are not known, simply enter N/K

Details of Vulnerable Adult

Name | Date of Birth

Address

Service User ID/ Episode ID | Gender ☐ M ☐ F

Date of Referral

Has a referral been made about this vulnerable adult before? ☐ Y ☐ N

Has a referral been made about this service/provider before? ☐ Y ☐ N

Has a referral been made about the alleged perpetrator before? ☐ Y ☐ N

Clients Ethnic Origin

☐ Black African ☐ Black Caribbean ☐ Mixed White and Asian

☐ Bangladeshi ☐ Chinese ☐ Mixed White and Black African

☐ Indian ☐ Pakistani ☐ Mixed White and Black Caribbean

☐ White British ☐ White Irish ☐ Mixed White and Chinese

☐ Other Asian ☐ Other Black ☐ Other Mixed background

☐ Other White ☐ Other Ethnic group

Vulnerable Adults Client Group

☐ Over 65s ☐ Learning Disability ☐ Physical Disability

☐ Mental ill Health Issues ☐ Substance Misuse ☐ Deaf

☐ Blind ☐ HIV/Aids ☐ Carer

Is the Vulnerable Adult known to other agencies:

☐ Yes If yes please provide details:

☐ No

Is the Vulnerable Adult from another District / Authority:

☐ Yes If yes please provide details:

☐ No

Details about the Allegation of Abuse

Source of Alert

☐ Partner	☐ Main Family Carer	☐ Other Family Member
☐ Paid Carer	☐ Other Service User	☐ Vulnerable Adult themselves
☐ Friend	☐ Formal Advocate	☐ Acute Hospital (including A&E)
☐ GP	☐ Service Provider	☐ Independent Healthcare Provider
☐ Volunteer	☐ General Hospital	☐ Healthcare Commission
☐ Police	☐ Social Services	☐ Specialist/Community Hospital
☐ Other PCT	☐ Neighbour	☐ Alleged Perpetrator
☐ Complaints	☐ Prison/Probation	☐ Domestic Violence Unit
☐ CSCI	☐ Voluntary Agency	☐ Counsellor/Therapist
☐ Anonymous	☐ Member of Public	☐ Other (please specify):

Location of Abuse

☐	Residential Home	☐	Independent Healthcare
☐	General Hospital	☐	Sheltered Accommodation
☐	Nursing Care Home	☐	Supported Accommodation
☐	Acute Hospital	☐	Day Centre/Service
☐	Public Place	☐	College/Adult Education/Work
☐	Vulnerable Adults' Own Home	☐	Vulnerable Adults' Parents Home
☐	Vulnerable Adults' Relatives Home	☐	Alleged Perpetrators' Home
☐	Specialist/Community Hospital	☐	Adult Placement Scheme
☐		☐	Other (please specify):

Type of Abuse

☐ Discriminatory ☐ Psychological ☐ Sexual

☐ Financial ☐ Physical ☐ Neglect and Acts of Omission

Date and time of Incident:	
Brief description of the allegation / abuse:	

Details about the alleged perpetrator

Name		Telephone	
Address			

Age

☐	-18	☐	18-30	☐	31-40	☐	41-50	☐	51-60	☐	61-70	☐	71-80	☐	80+

Gender ☐ M ☐ F

Alleged Perpetrator

☐ Partner ☐ Main Family Carer ☐ Other Family Member

☐ Friend ☐ Stranger ☐ Other Service User

☐ Neighbour ☐ Unknown ☐ Volunteer/Befriender

☐ Institution employees (residential home, domiciliary, nursing home, prison, secure units etc)

☐ Other Professional (Nurse, GP, Social Worker etc)

Actions against the alleged perpetrator (suspension etc):	

Details of the Referrer

Name		Telephone	
email			
Job title:			

I agree to the above information being shared by Broxtowe Borough Council, both internally and with appropriate partner agencies, in order that appropriate referrals can be made in respect of my care and support needs.

……..

Signature of adult thought to be at risk

Forward the completed form to the Designated Lead Officer spc@broxtowe.gov.uk

APPENDIX D

BROXTOWE COMPLEX CASE PANEL REFERRAL FORM

Agencies with access to ECINs

1. Upload the completed referral form to a **Report** entitled **CCP REFERRAL** ensuring that the **ECINs consent form OR the CCP Data Sharing Form** sections are **completed and signed**.
2. Link the **Report** to the individuals **Case** and **Profile**
3. For referrals where they are a **victim of ASB** the **ASB Risk Assessment** (found in the Profile Assessments tab) **MUST** also be completed
4. Give **access** to both the **CASE** and **REPORT** to **"Broxtowe CCP Group" in** the team access section
5. Send a message through ECINs or an email including the **CASE NUMBER** to **Marice Hawley** and **Debby Griffiths** to inform them a case has been referred

Agencies without access to ECINs

6. EMAIL the completed form ensuring that the **ECINs consent form OR the CCP Data Sharing Form** sections are **completed and signed** to **spc@broxtowe.gov.uk and marice.hawley@broxtowe.gov.uk**

please note: referrals and updates from agencies with access to ECINs can only be accepted through the ECINs system

***ALL SECTIONS ARE MANDATORY ***

<table>
<tr><td>Date</td><td>BBC Case number</td></tr>
<tr><td>Name</td><td rowspan="2">ECINs Profile Number
ECINs Case Number</td></tr>
<tr><td>DOB /approx. age</td></tr>
<tr><td>Address

Tenancy Type

Name of RSL/Landlord</td><td>SIGNED CONSENT

YES

NO (CCP Data Sharing section has been completed)</td></tr>
<tr><td colspan="2">Phone Number</td></tr>
<tr><td>ASB Victim YES/NO</td><td>ASB Risk Assessment completed YES/NO</td></tr>
<tr><td>Referred by Officer/ Agency</td><td>Repeat Referral Yes/No</td></tr>
<tr><td colspan="2">Risk Factors to Officers</td></tr>
</table>

NATURE OF VULNERABITY – **FULL INFORMATION OF PRE-EXISTING VULNERABILITY AND WHAT HAS HAPPENED RECENTLY TO INCREASE VULNERABILITY MUST BE PROVIDED**
What does the person want to happen?

Agency Involvement (please add any agencies involved in the case and their contact details)	**Contact**

Tell Us About You

We want to make sure that our services are provided fairly and to those who need them. The information collected helps us get a picture of who contacts us, uses or does not access our services, so will help us improve what we provide and reduce potential barriers to access.

Gender

How would you best describe your gender?

☐ Male
☐ Female
☐ Another way
☐ Prefer not to say

Age
Which of the following age groups do you belong to?
☐18-24
☐25-29
☐30-44
☐45-59
☐60-64
☐65+

Ethnicity
White
☐English/Welsh/Scottish/Northern Irish/British
☐Irish
☐Gypsy or Irish Traveller
☐Any other White background

Mixed/multiple ethnic groups
☐White and Black Caribbean
☐White and Black African
☐White and Asian
☐Any other mixed/multiple ethnic background

Asian or Asian British
☐Indian
☐Pakistani
☐Bangladeshi
☐Chinese
☐Any other Asian background

Black/African/Caribbean/Black British
☐African
☐Caribbean
☐Any other Black/African/Caribbean background

Other ethnic groups
☐Arab
☐Any other ethnic group

Are your day to day activities limited because of a health problem which has lasted or is expected to last at least 12 months?
☐Yes, limited a lot
☐Yes, limited a little
☐No

CONSENT TO SHARE WITH PARTNER AGENCIES

Any information disclosed and recorded within the context of this contact will be held in accordance with the Data Protection Act 1998.

This consent is to share with partner agencies for the purpose of keeping you and other people safe, supporting victims of crime, protecting your well-being, taking action against perpetrators and preventing further victimisation and offending.

Where there is a legal safeguarding duty towards children and vulnerable adults, appropriate referrals will be made regardless of consent.

The types of organisations that we will share information with are victims' services, relevant specialist crime services and support groups (e.g. hate crime support), local authorities, housing providers, social care providers, health services (including mental health services), criminal justice agencies including the Police and Prison services, restorative justice services, domestic abuse services, statutory public bodies such as the Fire Service, anti-social behaviour and community protection services and education providers (this is not an exhaustive list).

Consent from the person believed to be at risk or their parent/guardian should always be sought and recorded.

Consent can be withdrawn at any time and the process for doing so.

Is consent given for information to be shared with partner agencies?

Consent given Yes ☐ **No** ☐

Unable to consent ☐ **COMPLETE CCP DATA SHARING FORM**

Signature of person at risk	**Date**

SENSITIVE PERSONAL DATA
SHARING WITHOUT CONSENT APPLICATION

This form is to be completed <u>prior</u> to the sharing or disclosure of any personal data to third party agencies/organisations.

1. Information to be Shared	
1.1	Who and why do we think we need to share this information with? 1. General Practitioner ☐ 2. Signatories to the Data Sharing Protocol ☐
1.2	What information is to be shared?
1.3	Is the information sensitive personal data? Yes ☐ No ☐

2. Legal Basis for Data Sharing Without Consent		
2.1	**Schedule 2:** Which condition/s in Schedule 2 is met (please tick at least one)?	
	(3) - The processing is necessary for compliance with any legal obligation to which the data controller is subject, other than an obligation imposed by contract.	☐
	(4) - The processing is necessary in order to protect the vital interests of the data subject.	☐
	(5) - The processing is necessary— (b) for the exercise of any functions conferred on any person by or under any enactment,	☐
	Explain how the selected condition is met:	

2.1a	**Schedule 3:** Which condition/s in Schedule 3 is met (please tick at least one)?	
2.2	3 - The processing is necessary (a) in order to protect the vital interests of the data subject or another person, in a case where (i) consent cannot be given by or on behalf of the data subject, or	☐
	(ii) the data controller cannot reasonably be expected to obtain the consent of the data subject, or	☐
	(b) in order to protect the vital interests of another person, in a case where consent by or on behalf of the data subject has been unreasonably withheld.	☐
	7 (1) - The processing is necessary— (b) for the exercise of any functions conferred on any person by or under an enactment, or	
	10 - The personal data are processed in circumstances specified in an order made by the Secretary of State for the purposes of this paragraph. **– see Data Protection – Processing of Sensitive Personal Data Order 2000, para 4 below** (4) The processing— (a) is in the substantial public interest;	☐
	(b) is necessary for the discharge of any function which is designed for the provision of confidential counselling, advice, support or any other service; and	☐
	(c) is carried out without the explicit consent of the data subject because the processing— (i) is necessary in a case where consent cannot be given by the data subject,	☐
	(ii) is necessary in a case where the data controller cannot reasonably be expected to obtain the explicit consent of the data subject, or	☐
	(iii) must necessarily be carried out without the explicit consent of the data subject being sought so as not to prejudice the provision of that counselling, advice, support or other service.	☐
2.2a	Explain how the selected condition is met:	

3. Decision		
Having carefully considered the available evidence the decision is taken to:-		
3.1	Disclose the sensitive personal data	☐
3.2	Not to disclose the sensitive personal data	☐

4. Officer Details		
4.1	Form completed by:- Print name: Job Title Signature: Date:	Chief Communities Officer Approval:- Print name: Signature: Date:

5. Post Disclosure Information	
5.1	Name of Meeting:
5.2	Date(s) of Meeting
5.3	Location:
5.4	Which agencies was the information disclosed to?

APPENDIX E

TYPES AND POSSIBLE INDICATORS OF ABUSE

Types of physical abuse Hitting, slapping, punching, kicking, hair-pulling, biting, pushing Rough handling Scalding and burning Physical punishments Inappropriate or unlawful use of restraint Making someone purposefully uncomfortable (e.g. opening a window and removing blankets) Involuntary isolation or confinement Misuse of medication (e.g. over-sedation) Forcible feeding or withholding food Restricting movement (e.g. tying someone to a chair)	**Possible indicators of this abuse occurring** No explanation for injuries or inconsistency with the account of what happened Injuries are inconsistent with the person's lifestyle Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps Frequent injuries Unexplained falls Subdued or changed behaviour in the presence of a carer Signs of malnutrition Failure to seek medical treatment or frequent changes of GP
Types of sexual abuse Any sexual activity that the person lacks the capacity to consent to Inappropriate touch anywhere Sexual penetration or attempted penetration Inappropriate looking, innuendo or sexual harassment Rape, attempted rape or sexual assault Sexual photography or forced use of pornography or witnessing of sexual acts Indecent exposure	**Possible indicators of this abuse occurring** Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck Torn, stained or bloody underclothing Bleeding, pain or itching in the genital area Unusual difficulty in walking or sitting Infections or sexually transmitted diseases Pregnancy in a woman who is unable to consent to sexual intercourse The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude Incontinence not related to any medical diagnosis Self-harming Poor concentration, withdrawal, sleep disturbance Excessive fear/apprehension of, or withdrawal from, relationships Fear of receiving help with personal care

	Reluctance to be alone with a known individual
Types of Financial or material abuse Theft of money or possessions Fraud Preventing a person from accessing their own money or assets Employees taking a loan from a person using the service Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions Arranging less care than is needed to save money to maximise inheritance Denying assistance to manage/monitor financial affairs Denying assistance to access benefits Misuse of personal allowance in a care home Someone moving into a person's home and living rent free without agreed financial arrangements False representation, using another person's bank account, cards or documents Exploitation of a person's money or assets, e.g. unauthorised use of a car Misuse of a power of attorney, deputy, appointeeship or other legal authority	**Possible indicators of this abuse occurring** Missing personal possessions Unexplained lack of money or inability to maintain lifestyle Unexplained withdrawal of funds from accounts Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so The person allocated to manage financial affairs is evasive or uncooperative The family or others show unusual interest in the assets of the person Signs of financial hardship in cases where the adult at risk's financial affairs are being managed by a court appointed deputy, attorney or LPA Recent changes in deeds or title to property Rent arrears and eviction notices A lack of clear financial accounts held by a care home or service Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
Types of Neglect and Acts of Omission Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care Failure to provide care in the way the person wants	**Possible indicators of this abuse occurring** Poor environment – dirty or unhygienic Poor physical condition and/or personal hygiene Pressure sores or ulcers Malnutrition or unexplained weight loss Untreated injuries and medical problems Inconsistent or reluctant contact with medical and social care organisations

Failure to administer medication as prescribed Refusal of access to visitors Not taking account of individuals' cultural, religious or ethnic needs Not taking account of educational, social and recreational needs Ignoring or isolating the person Failure to allow choice and preventing people from making their own decisions Failure to allow use of glasses, hearing aids, dentures, etc Failure to ensure appropriate privacy and dignity	Accumulation of untaken medication Uncharacteristic failure to engage in social interaction Inappropriate or inadequate clothing
Types of Discriminatory Abuse Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010) Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader Harassment or deliberate exclusion on the grounds of a protected characteristic Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic Substandard service provision relating to a protected characteristic	**Possible indicators of this abuse occurring** The person appears withdrawn and isolated Expressions of anger, frustration, fear or anxiety The support on offer does not take account of the person's individual needs in terms of a protected characteristic

Types of Domestic Violence.	Possible indicators of this abuse occurring
Psychological Instilling or attempting to instil fear **Physical** Inflicting or attempting to inflict physical injury Withholding access to resources necessary to maintain health **Sexual** Coercing or attempting to coerce any sexual contact without consent Attempting to undermine the victim' sexuality **Financial** Making or attempting to make the victim financially dependent **Emotional** Undermining or attempting to undermine victim sense of worth	• Having low self-esteem; being extremely apologetic and meek • Referring to the partner's temper but not disclosing the extent of the abuse • Having a drug or alcohol abuse problem • Having symptoms of depression such as sadness or hopelessness, or loss of interest in daily activities • Talking about suicide, attempting suicide, or showing other warning signs of suicide • Bruises or injuries that look like they came from choking, punching, or being thrown down. Black eyes, red or purple marks at the neck, and sprained wrists are common injuries in violent relationships. • Attempting to hide bruises with make-up or clothing • Making excuses like tripping or being accident-prone or clumsy. Often the seriousness of the injury does not match up with the explanation. • Having few close friends and being isolated from relatives and coworkers and kept from making friends • Having to ask permission to meet, talk with, or do things with other people • Having little money available; may not have credit cards or even a car
Types of Institutional Abuse Discouraging visits or the involvement of relatives or friends Run-down or overcrowded establishment Authoritarian management or rigid regimes	**Possible indicators of this abuse occurring** Lack of flexibility and choice for adults using the service Inadequate staffing levels People being hungry or dehydrated Poor standards of care

Lack of leadership and supervision Insufficient employees or high turnover resulting in poor quality care Abusive and disrespectful attitudes towards people using the service Inappropriate use of restraints Lack of respect for dignity and privacy Failure to manage residents with abusive behaviour Not providing adequate food and drink, or assistance with eating Not offering choice or promoting independence Misuse of medication Failure to provide care with dentures, spectacles or hearing aids Not taking account of individuals' cultural, religious or ethnic needs Failure to respond to abuse appropriately Interference with personal correspondence or communication Failure to respond to complaints	Lack of personal clothing and possessions and communal use of personal items Lack of adequate procedures Poor record-keeping and missing documents Absence of visitors Few social, recreational and educational activities Public discussion of personal matters or unnecessary exposure during bathing or using the toilet Absence of individual care plans Lack of management overview and support
Types of psychological or emotional abuse Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance Preventing someone from meeting their religious and cultural needs Preventing the expression of choice and opinion Failure to respect privacy Preventing stimulation, meaningful occupation or activities Intimidation, harassment, use of threats, humiliation, bullying, swearing or verbal abuse Addressing a person in a patronising or infantilising way	**Possible indicators of this abuse occurring** An air of silence when a certain person is present Withdrawal or change in the psychological state of the person

Types of self neglect	Possible indicators of this abuse occurring
Living in grossly unsanitary conditions Suffering from an untreated illness, disease or injury Suffering from malnutrition to such an extent that, without an intervention, the adult's physical or mental health is likely to be severely impaired. Creating a hazardous situation that will likely cause serious physical harm to the adult or others or cause substantial damage to or loss of assets (for example, hoarding) Suffering from an illness, disease or injury that results in the adult dealing with his or her assets in a manner that is likely to cause substantial damage to or loss of the assets.	Weight Loss Incontinence Infected Sores Skin Integrity compromised Missed health appointments, health professionals unable to gain access, Failure to follow treatment plans, medication regimes. Repeated injuries as a result of falls, accidents in the kitchen etc Fire Hazards, alerts raised by fire service, unsafe electrical appliances. Alerts raised by police, ambulance, re concerns for safety. Extreme clutter Windows/Locks broken No heating, water, electricity Little or no sign of food in the home Infestations

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Change Table

Appendix 2

Policy Section	Suggested Change	Reason for Change
Title Page	Change of Dates	Updated policy
1.2	ADD Communities and Community Safety	Update list of Depts
3.0	ADD and to ensure the Council delivers the Safeguarding Duty	Reflect the Council's duty
4.1	ADD or Police Vetting	For completeness
6.4	CHANGE Chief Communities Officer to Head of Communities and Community Safety	Update Title
6.4	CHANGE relevant council committees to Councillors	Reflect change in committee reporting (now through Members Matters)
6.4	ADD the Multi Agency Childrens Sexual Exploitation Panel (MASE), the Child Criminal Exploitation Panel (CCEP), the Neighbourhood Safeguarding and Diversionary Panel (NSD) the County Council Serious Case Reviews (SARs), the Complex Cases Panel (CCP)	For completeness
6.5 – 6.10	CHANGE numbering from 6.6 – 6.11 to 6.5 – 6.10	Correct historical typo missing out 6.5
6.10	CHANGE partner agencies for the Multi Agency Safeguarding Hub (MASH	Correct terminology
6.10	Change need for can	Reflect actual circumstances.

Policy Section	Suggested Change	Reason for Change
7.1	ADD The Council stores and shares sensitive information on all vulnerable person and safeguarding cases through the Empowering Communities Inclusion and Neighbourhood Management System (E-CINs). E-CINs is a multinational multi agency secure information sharing system.	Provide additional information
7.2	ADD or Police Vetting	For completeness
9.5	ADD causing harassment, alarm or distress	For accuracy
9.5	ADD Local Authorities do not have the powers to deal with all types of ASB some are matters for the Police. In Nottinghamshire the Police, PCC and local authorities have worked to produce a protocol determining the types of ASB which Councils will enforce to reduce “post code lottery” and assist residents in reporting.	Provide additional information
Appendix A 1.	ADD or to complete the online form at the address below and the web link	For completeness
Appendix A 4.	CHANGE Job titles of Independent Living Manager and Head of Communities and Community Safety	Update titles

Appendix 3

Equality Impact Assessment

The Equality Act 2010 replaces the previous anti-discrimination laws with a single Act. It simplifies the law, removing inconsistencies and making it easier for people to understand and comply with it. It also strengthens the law in important ways, to help tackle discrimination and equality. The majority of the Act came into force on 1 October 2010.

Public bodies are required in it to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited under the Act
- advance equality of opportunity between people who share a protected characteristic and people who do not share it, and
- foster good relations between people who share a protected characteristic and people who do not share it.

The public sector Equality Duty came into force on 5 April 2011. The duty ensures that all public bodies play their part in making society fairer by tackling discrimination and providing equality of opportunity for all. It ensures that public bodies consider the needs of all individuals in their day to day work – in shaping policy, delivering services and in relation to their own employees.

The Equality Duty encourages public bodies to understand how different people will be affected by their activities so that policies and services are appropriate and accessible to all and meet different people's needs. By understanding the effect of their activities on different people, and how inclusive public services can support and open up people's opportunities, public bodies are better placed to deliver policies and services that are efficient and effective.

The new equality duty replaces the three previous public sector equality duties, for race, disability and gender. The new equality duty covers the following protected characteristics:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race – this includes ethnic or national origins, colour or nationality
- religion or belief – including lack of belief
- sex
- sexual orientation.

It also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

The Council has also decided to treat people who have care experience as if they had a protected characteristic under the law.

Having due regard means consciously thinking about the three aims of the equality duty as part of the process of decision-making. This means that consideration of equality issues must influence the decisions reached by public bodies, including how they act as employers, how they develop, evaluate and review policies, how they design, deliver and evaluate services, and how they commission and procure from others.

Having due regard to the need to advance equality of opportunity involves considering the need to:

- remove or minimise disadvantages suffered by people due to their protected characteristics
- meet the needs of people with protected characteristics, and
- encourage people with protected characteristics to participate in public life or in other activities where their participation is low.

Fostering good relations involves tackling prejudice and promoting understanding between people who share a protected characteristic and others.

Complying with the equality duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive action provisions in order to provide a service in a way which is appropriate for people who share a protected characteristic.

The Equality Duty also explicitly recognises that disabled people's needs may be different from those of non-disabled people. Public bodies should therefore take account of disabled people's impairments when making decisions about policies or services. This might mean making reasonable adjustments or treating disabled people better than non-disabled people in order to meet their needs.

There is no explicit requirement to refer to the Equality Duty in recording the process of consideration but it is good practice to do so. Keeping a record of how decisions were reached will help public bodies demonstrate that they considered the aims of the Equality Duty. Keeping a record of how decisions were reached will help public bodies show how they considered the Equality Duty. Producing an Equality Impact Assessment after a decision has been reached will not achieve compliance with the Equality Duty.

It is recommended that assessments are carried out in respect of new or revised policies and that a copy of the assessment is included as an appendix to the report provided to the decision makers at the relevant Cabinet, Committee or Scrutiny meeting.

Where it is clear from initial consideration that a policy will not have any effect on equality for any of the protected characteristics, no further analysis or action is necessary.

Public bodies should take a proportionate approach when complying with the Equality Duty. In practice, this means giving greater consideration to the Equality Duty where a policy or function has the potential to have a discriminatory effect or impact on equality of opportunity, and less consideration where the potential effect on equality is slight. The Equality Duty requires public bodies to think about people's different needs and how these can be met.

EQUALITY IMPACT ASSESSMENT (EIA)

Directorate:	Chief Execs	Title of the Lead Officer responsible for EIA	Head of Communities and Community Safety
Name of the policy or function to be assessed:		Safeguarding Adults Policy 2025-28	
Title of the Officer undertaking the assessment:		Head of Communities and Community Safety	
Is this a new or an existing policy or function?		Existing Policy	

1. What are the aims and objectives of the policy or function?

This policy sets out the Council's commitment to safeguarding adults who are at risk and how it will meet its moral and statutory obligations through decision making, service delivery, and other appropriate actions and developments.

Broxtowe Borough Council's (the Council's) Vision for Broxtowe is "A greener, safer, healthier Broxtowe, where everyone prospers"

The Council's corporate priority for Community Safety is *"*A safe place for everyone*"*

2. What outcomes do you want to achieve from the policy or function?

Implement and maintain systems of working practice to safeguard vulnerable adults during council activities

To fully assist Nottinghamshire County Council and other relevant agencies in the safeguarding and promotion of the welfare of adults with care and support needs who are experiencing, or at risk of, abuse or neglect.

To develop and implement appropriate procedures to ensure the well-being of adults in need of safeguarding to protect them from harm

To provide employees, Councillors and volunteers (working on behalf of Broxtowe BC) with training, guidance and support to assist them in recognising and responding to indicators of possible abuse or neglect

Directorate:	Chief Execs	Title of the Lead Officer responsible for EIA	Head of Communities and Community Safety

To ensure that all employees working with adults with care and support needs can identify the signs and symptoms of the ten types of neglect and abuse

To ensure that all employees understand and follow the relevant procedures when they have concerns about adult abuse or neglect.

To ensure that any appropriate Disclosure and Barring Service (DBS) checks are completed, as determined by Broxtowe Borough Council's Recruitment and Selection Policy, for employees that work with, or have significant access to, adults at risk of abuse or neglect.

To facilitate the Adults at Risk Panel in Broxtowe. This is a multi-agency forum which meets to share intelligence on known adults at risk and other adults who may be considered vulnerable (including medium risk victims of domestic violence and abuse), to ensure all appropriate help and support can be provided.

3. Who is intended to benefit from the policy or function?

Adults in the borough who may be considered at risk of abuse or neglect.

4. Who are the main stakeholders in relation to the policy or function?

Adult residents of the borough; Broxtowe borough Council staff, Nottinghamshire Safeguarding Adults Board; Nottinghamshire County Council; relevant partner agencies, charities and organisations.

5. What baseline quantitative data do you have about the policy or function relating to the different equality strands?

The number of concerns received in 2023/24 increased to over 10,000 for the first time. Whilst that represents a 15% increase on the previous year, it should be noted that Nottinghamshire saw a drop in referral numbers received in 2022/23 compared to 2021/22, bucking the national trend of year-on-year increases. This decrease has since reversed and the county has fallen back into line with the national picture, with early indications being that this trend will continue.

Figures regarding the gender split of safeguarding concerns in the county remained roughly the same in 2023/24 as in 2022/23. Females accounted for 61% in 2022/23, dropping slightly to 58% in 2023/24. Males saw a broadly corresponding increase from 38% in 2022/23 to 40% in 2023/24, with the final increase in 'gender unknown', from 1% in 2022/23 to 2% in 2023/24.

Overall, the age of adults involved in safeguarding enquiries was similar in 2023/24 to the previous year, with just over half of all enquiries concerning adults aged 65 or above, and just under half concerning adults aged 18 to 65. The largest cohort of adults aged over 65 experiencing abuse remained those aged 75 to 84, and the second largest cohort remained those aged 85 to 94, with the picture for the third and fourth largest cohorts also broadly replicating the ratios from the previous year

Directorate:	Chief Execs	Title of the Lead Officer responsible for EIA	Head of Communities and Community Safety

(Nottinghamshire Safeguarding Adults Board Annual Report 2023-24)

6. What baseline qualitative data do you have about the policy or function relating to the different equality strands?

None available

7. What has stakeholder consultation, if carried out, revealed about the nature of the impact?

Not undertaken.

8. From the evidence available does the policy or function affect or have the potential to affect different equality groups in different ways? In assessing whether the policy or function adversely affects any particular group or presents an opportunity for promoting equality, consider the questions below in relation to each equality group:

Does the policy or function target or exclude a specific equality group or community? Does it affect some equality groups or communities differently? If yes, can this be justified?

The policy does not adversely affect any individual group.

Some of the issues highlighted in the policy affect individual groups such as forced marriage. The targeting of this is wholly justified on the basis that it is now illegal.

Is the policy or function likely to be equally accessed by all equality groups or communities? If no, can this be justified?

Yes

Are there barriers that might make access difficult or stop different equality groups or communities accessing the policy or function?

No

Could the policy or function promote or contribute to equality and good relations between different groups? If so, how?

It is anticipated that positively addressing the issue of safeguarding adults across all groups, will only be seen as beneficial.

What further evidence is needed to understand the impact on equality?

None

9. On the basis of the analysis above what actions, if any, will you need to take in respect of each of the equality strands?
Age: No further action required
Disability: No further action required
Gender: No further action required
Gender Reassignment: No further action required
Marriage and Civil Partnership: No further action required
Pregnancy and Maternity: No further action required
Race: No further action required
Religion and Belief: No further action required
Sexual Orientation: No further action required
Care Experience: No further action required

Chief Officer: Chief Executive

I am satisfied with the results of this EIA. I undertake to review and monitor progress against the actions proposed in response to this impact assessment. **Signature:**

Appendix 4

Safeguarding Data 2024

Adult Safeguarding Referrals			
TYPE	**2022 (Adult and Children)**	**2023 (Adult and Children)**	**2024 (Adult only)**
Threats to Suicide	8	13	24
Mental Health	4	4	22
Domestic Abuse	1	0	1
Physical Abuse	6	2	4
Financial Abuse	1	3	4
Neglect/Self Neglect	3	5	4
Sexual Abuse	4	1	1
Debt	0	0	0
Hoarding	2	4	4
Learning Disability	1	0	0
Emotional Abuse	3	0	0
Dementia	3	3	0
Organisational Abuse	0	2	0
Alcohol misuse	0	2	0
Drugs	0	0	0
Housing	0	4	7
Honour Based	0	1	0
Access to Food	0	0	15
Missing with children	0	0	1
Hate Crime	0	0	1
Trafficking/Modern Slavery	0	0	2
Total	**36**	**44**	**70 (20 individuals referred for 2 reasons)**

TYPE	2024 (Children only)
Physical Abuse	1
Neglect	9
Suspected parental abduction	3
Access to Food	2
Total	**13 (2 individuals referred for 2 reasons)**

Complex Case Panel Referrals 2023				
	2023	**Types**	**2024**	**Types**
January	3	Hoarding, ASB, Mental Health, Threats to Kill	11	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide
February	3	Hoarding, ASB, Mental Health, Threats to Kill	16	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health,
March	3	Hoarding, ASB, Mental Health, Threats to Kill	16	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing
April	4	Hoarding, ASB, Mental Health, Threats to Kill	16	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB
May	3	Hoarding, ASB, Mental Health, Threats to Kill	16	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health
June	3	Hoarding, ASB, Mental Health, Threats to Kill	16	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health, Coercive controlling behaviour and Sexual abuse.
July	12	Hoarding, ASB, Mental Health, Threats to Kill, PTSD, Physical Abuse, Threats to Suicide, Living Conditions	17	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health, Coercive controlling behaviour and Sexual abuse, Rape, Sexual Assault, Modern Slavery, Self-Neglect,
August	No Meeting	No Meeting	No Meeting	No Meeting
September	18	Hoarding, ASB, Mental Health, Threats to Kill, PTSD, Physical Abuse, Threats to Suicide, Living Conditions, Physical	9	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial,

		Disability, Neglect, Dementia, Alcohol Abuse, Missing Children		Health, Coercive controlling behaviour and Sexual abuse, Rape, Sexual Assault, Modern Slavery, Self-Neglect, Cuckooing,
October	10	Hoarding, ASB, Mental Health, Threats to Kill, PTSD, Physical Abuse, Threats to Suicide, Living Conditions, Physical Disability, Neglect, Dementia, Alcohol Abuse,	11	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health, Coercive controlling behaviour and Sexual abuse, Rape, Sexual Assault, Modern Slavery, Self-Neglect, Cuckooing
November	10	Hoarding, ASB, Mental Health, Threats to Kill, PTSD, Physical Abuse, Threats to Suicide, Living Conditions, Physical Disability, Neglect, Dementia, Alcohol Abuse,	10	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health, Coercive controlling behaviour and Sexual abuse, Rape, Sexual Assault, Modern Slavery, Self-Neglect, Cuckooing
December	11	Hoarding, ASB, Mental Health, Threats to Kill, PTSD, Physical Abuse, Threats to Suicide, Living Conditions, Physical Disability, Neglect, Dementia, Alcohol Abuse, Financial Abuse	10	Hoarding, Housing, ASB, Living conditions, Alcohol, Drugs, Theft, Threats to suicide, No access to food, Mental Health, Neglect, Housing, ASB, Financial, Health, Coercive controlling behaviour and Sexual abuse, Rape, Sexual Assault, Modern Slavery, Self-Neglect, Cuckooing

The most common reason for referral and ongoing panel inclusion is None-Engagement with services.

Children Discussed at Panel				
	Child Criminal Exploitation Panel		**Local Neighbourhood Safeguarding and Disruption Panel**	
	2023	2024	2023	2024
January	0	0	1	5
February	0	0	2	6
March	0	1	2	5
April	0	1	2	7
May	1	1	3	5
June	1	1	3	7
July	1	1	6	7
August	1	1	3	5
September	0	1	4	7
October	0	1	3	8
November	0	1	3	5
December	0	1	2	6

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Cabinet **29 July 2025**

Report of the Portfolio Holder for Community Safety

Slavery and Human Trafficking Statement 2024/25

1. Purpose of Report

To seek approval for the annually reviewed and updated Slavery and Human Trafficking Statement 2024/25 and for its publication on the Council's website and the Home Office's modern slavery statement portal. This is in accordance with the Council's Corporate Priority of Community Safety.

2. Recommendation

Cabinet is asked to RESOLVE that the Broxtowe Borough Council Slavery and Human Trafficking Statement 2024/25 be approved.

3. Detail

The Modern Slavery Act 2015 consolidates various offences relating to human trafficking and slavery.

Section 54 of the Act imposes a legal duty on commercial organisations, which supply goods and/or services from or to the UK and have a global turnover of more than £36 million, to publish a slavery and human trafficking statement each financial year. The Council engages in commercial activities by providing services (some of which are statutory and some discretionary) and its annual turnover is greater than the specified amount.

Modern slavery clauses are included in legal contracts where appropriate and Modern Slavery Policies are requested from third party organisations along with Safeguarding, Equalities, Data Protection Act 2018 (including GDPR) and Environmental / Carbon Impact policies at account meetings. The Council's contract and procurement arrangements require clauses in all contracts which relate to contractors complying with the Council's procurement policy.

Whilst the Modern Slavery Act 2015 does not state that Local Authorities specifically are included in those organisations legally required to publish a statement, many do so as a matter of good practice. It is considered that the Council should be keen to raise awareness of slavery and human trafficking and as a large-scale local employer and provider of services, should make its position of zero tolerance in respect of slavery and trafficking clear and unequivocal.

In 2024 there were 21 individuals from Broxtowe referred to the countywide Slavery and Exploitation Team (SERAC) with cuckooing and financial exploitation being the most prominent (child criminal and sexual exploitation are not included in these figures as these are referred to separate services) with the most prevalent vulnerability factors being Mental Health and Substance Misuse.

In the same year, 21 young people who were victims of Child Criminal Exploitation (CCE) were managed locally through the Neighbourhood Safeguarding and Disruption (NSD) or the Child Criminal Exploitation (CCEP) Panels compared to 11 in 2023.

The exploitation worker from the Modern Slavery Team attends the monthly Neighbourhood Safeguarding and Disruption meetings and Complex Case Panel meetings to assist in identifying and managing victims and those at risk of being victims of exploitation.

Local Authority Slavery and Human Trafficking Statements are published on Local Authority Websites and through the Home Office's portal.

The Modern Slavery and Human Trafficking Statement 2024/25 is attached at **Appendix 1** and an Equality Impact Assessment at **Appendix 2.**

4. Key Decision

This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as it is significant in terms of its effects on communities living or working in an area comprising two or more Wards or electoral divisions in the Council's area.

5. Financial Implications

The comments from the Head of Finance Services were as follows:

There are no additional financial implications for the Council with operational costs being contained within existing budgets.

6. Legal Implications

The comments from the Monitoring Officer / Head of Legal Services were as follows:

The legal implications are contained within the report, as stated whilst local authorities are not legally required to publish a Modern Slavery and Human Trafficking Statement it is considered best practice.

7. Human Resources Implications

Not applicable.

8. Union Comments

   Not applicable.

9. Climate Change Implications

   The climate change implications are contained within the report.

10. Data Protection Compliance Implications

    This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

11. Equality Impact Assessment

    As this is a new statement an equality impact assessment is included in the appendix to this report.

12. Background Papers

    Nil.

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Appendix 1

BROXTOWE BOROUGH COUNCIL
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024

1. Introduction

1.1 Broxtowe Borough Council (the Council) is committed to preventing slavery and human trafficking in the delivery of its services and corporate activities. The Council recognises that slavery and human trafficking remain a hidden blight on our society, that it has a responsibility to be alert to the risks and to strive to ensure that its supply chains are free from slavery and human trafficking.

1.2 This Modern Slavery and Human Trafficking Statement details the steps the Council has taken to understand potential modern slavery risks related to its business and to put in place measures that ensure these offences are not committed in its own business or its supply chains.

1.3 This Statement relates to activity carried out during the financial year ending 31 March 2025. The Council will be reviewing the Statement on an annual basis and a new updated Statement, acknowledging any further actions that may have been taken, will be published in each subsequent year and uploaded to the Home Office's portal.

2. The Modern Slavery Act 2015

2.1 The Modern Slavery Act 2015 (the Act) consolidates various offences relating to human trafficking and slavery. Broadly speaking:

- 'slavery' is where ownership is exercised over a person;
- 'servitude' involves coercion to oblige a person to provide services;
- 'forced and compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of a penalty;
- 'human trafficking' involves arranging or facilitating the travel of a person with a view to exploiting them.

2.2 Section 52 of the Act imposes a duty on public authorities, including district Councils, to notify the Secretary of State of suspected victims of slavery or human trafficking.

2.3 Section 54 of the Act imposes a legal duty on commercial organisations, which supply goods and/or services from or to the UK and have a global turnover of more than £36 million, to publish a slavery and human trafficking statement each financial year.

2.4 The Council engages in commercial activities by providing services (some of which are statutory and some discretionary) and its annual turnover is greater than

the specified £36 million. Whilst the Act does not state that local authorities are among the organisations legally required to publish a statement, the Council has chosen to do so as a matter of good practice. The Council is keen to raise awareness of slavery and human trafficking and as a large scale local employer and provider of services, it is seen as imperative that the Council makes its position of zero tolerance in respect of slavery and trafficking clear and unequivocal.

3. Standards

3.1 The Council will meet the following standards and also expects those with whom it does business, to meet them:

- To support every individual's human right to live free from abuse, servitude and inhumane treatment;
- To promote ethical business and operational practices in corporate activity and services delivered;
- To take appropriate steps to ensure that slavery and human trafficking is not taking place in any of its business or supply chains;
- To take reports of witnessed, suspected or disclosed concerns of slavery and human trafficking seriously and ensure that such reports are shared with appropriate law enforcement and other partner agencies in order that they can be fully investigated;
- To take appropriate action to address actual instances of slavery and human trafficking brought to the Council's attention and to take all reasonable steps to support and protect its victims.

4. Organisational structure

4.1 The Council is a second tier local authority situated in the County of Nottinghamshire. The Council provides a wide range of statutory and discretionary services delivered both directly by itself, through partnership working with other agencies and commissioned work by external contractors.

4.2 The Council's Constitution and details of the organisational and political structures are available on the Council's website;
https://www.broxtowe.gov.uk/about-the-council/councillors-committees/council-constitution/
Political Structure (broxtowe.gov.uk)
Search (broxtowe.gov.uk)

5. Supply chains

5.1 As part of its procurement processes, the Council will require that all suppliers of goods and services comply with all applicable laws, statutes, regulations and codes including the Modern Slavery Act 2015. Suppliers will also be expected to publish a Slavery and Human Trafficking Statement (where required by law). Contract terms and conditions will set out the requirements of suppliers and sub-

contractors in relation to ensuring there is no slavery or human trafficking in their businesses.

5.2 The Council will also require its suppliers and sub-contractors engaged in 'regulated activity' for children and adults at risk to have safeguarding policies, procedures and training in place and to comply with the reporting procedures in the Council's Adult and Children's Safeguarding Policies.

6. Policies and Plans

Broxtowe Borough Council has a range of policies and plans in place that reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations. These include:

6.1 **Council's Corporate Plan 2024 - 2029** – a key corporate priority is that "Broxtowe will be a safe place for everyone."

To achieve this outcome, the Council is working, individually and with partner agencies, to reduce crime and anti-social behaviour; using statutory powers to improve public safety, for example, enforcement of licensing requirements; raising awareness of services available; and encouraging victims to report incidents to access the support they need.

The Corporate Plan 2024 - 2029 is available on the Council's website;
https://www.broxtowe.gov.uk/about-the-council/strategies-plans-policies/corporate-plan/

6.2 **Safeguarding Policies** – The Council's Safeguarding Adults and Safeguarding Children policies set out the steps the Council is taking to safeguard and protect the welfare of children and adults at risk who come into contact with its services and activities. The policies include the Council's responsibilities in respect of modern slavery and human trafficking and its legal obligation to notify the Home Office of suspected victims of these offences. The Council recognises that Nottinghamshire County Council is the lead agency in the Borough with regard to the protection of children and adults at risk. However, Broxtowe Borough Council has a statutory duty to work in partnership with these agencies to identify, refer and respond to suspected abuse and to provide additional support. These policies were refreshed in June 2025.

The Adult and Children's Safeguarding Policies are available on the website;
https://www.broxtowe.gov.uk/for-you/crime-safety-emergencies/safeguarding/

In addition to the Council's own Adult and Childrens Safeguarding Policies the Council also subscribes, in partnership with all other Nottinghamshire District councils, to the online safeguarding policy platform TriEx. TriEx ensures all national policy and guidance changes are captured in this ever changing sector.

6.3 **Whistleblowing Policy** – The Council encourages all its employees, Members, contractors, their agents and/or subcontractors, consultants, suppliers

and service providers to report concerns about any aspect of service provision, conduct of Officers and others acting on behalf of the Council. The Whistleblowing Policy is intended to make it easier to disclose information without fear of discrimination and victimisation. This Policy was refreshed in 2019.

The Whistleblowing Policy is available on the Intranet.

6.4 **Code of Conduct** – The Council makes clear to all its employees and Members that there are expected standards of behaviour to which they must adhere when they are representing and acting on behalf of the Council. Employee and Member conduct and behaviour that fails to meet these standards is fully investigated and appropriate action taken. The Employee Code of Conduct was refreshed in 2020 and the Member Code of Conduct refreshed in 2023.

The Member Code of Conduct is available on the website;
https://www.broxtowe.gov.uk/Search?q=code+of+conduct

The Employee Code of Conduct is available on the intranet.

6.5 **Recruitment and Selection Procedures Policy** – This sets out procedures followed to vet new employees to ensure that confirmation of their identities and qualifications is obtained. To comply with the Immigration, Asylum and Nationality Act 2006, prospective employees are asked to supply evidence of their eligibility to work in the United Kingdom following the guidance https://www.gov.uk/prove-right-to-work. The Council has a formal procedure for employing UK and Non UK Nationals which is available on the intranet.

References are sought and followed up for all external employees and Police vetting is carried out where relevant to the post. The Communities Team are all Police vetted. However, there are no posts at the Borough Council which fit the criteria for Disclosure and Barring Service (DBS) checks. These are carried out for colleagues who take students on off site visits for safeguarding purposes. Liberty Leisure carry out their own checks.

The Recruitment and Selection Procedures are available on the intranet.

6.6 **Money Laundering Prevention Policy** – This sets out the Council's commitment to the prevention, detection and reporting of money laundering. This Policy was refreshed in 2019**.**

The Money Laundering Prevention Policy is available on the intranet.

6.7 **Procurement and Commissioning Strategy 2019 - 2024** – This Strategy sets out the strategic aims and principles of procurement activity, including the principles that the Council follows in the acquisition of goods, works and services from suppliers. This Strategy was refreshed in 2019.

The Procurement and Commissioning Strategy is available on the website;
https://www.broxtowe.gov.uk/for-business/procurement-contract-opportunities/

6.8 **Equality and Diversity Policy** – This policy provides a framework for the Council's approach to the wide ranging equality and diversity agenda.
The Council annually refreshes its equality and diversity objectives, sets out its annual activity in progressing the Equality duty and reports on an action plan to carry forward the work. The latest report in 2023 can be found at this link https://democracy.broxtowe.gov.uk/documents/s26770/3.1%20Appendix%201%20Equalities%20Annual%20Report%202022-3%20revised.pdf

7. Due Diligence

7.1 The Council's approach to procurement requires suppliers of goods and services to implement due diligence procedures in relation to slavery and human trafficking with their own suppliers, sub-contractors and other participants in their supply chain. For organisations with a turnover below £36 million, suppliers will be asked to confirm their acceptance of this Modern Slavery and Human Trafficking Statement. The Procurement Team are also working to establish a protocol for establishing Modern Slavery and Human Trafficking checks as part of the new contract management framework.

7.2 As part of the Council's commitment to identify and mitigate risk, Council departments work together and alongside partner agencies to:

- Identify and assess potential risk areas in its business affairs;
- Mitigate the risk of slavery and human trafficking through robust checks and balances;
- Monitor and review any potential risk areas identified;
- Identify and report individuals and properties of concern;
- Protect whistle blowers.

8. Training

8.1 The Council has made considerable efforts to ensure that initiatives to raise awareness of slavery and human trafficking, and services available to assist victims have been prioritised. The Council provides training for its employees and the online e-learning system contains mandatory modules of Modern Slavery as well as Serious Organised Crime. The purpose of the training has been to enable employees to better identify and know how to report, suspected or disclosed incidents, including situations involving slavery and trafficking.

9. Targeted activity

9.1 The Council has a strong history of working in partnership with other local authorities, both at county and district level, partner agencies, local charities and community groups. Within Nottinghamshire it was recently agreed to expand the modern slavery team which is hosted by Nottingham City Council to provide more capacity for the team to work within the county area including south

Nottinghamshire. Broxtowe agreed to contribute £16,390 in the 2024/25 and £17,763 in 2025/26 financial years towards the costs of the team. The Council is also an active member of Nottinghamshire's Serious Organised Crime Board and Serious Organised Crime Management Group. The Council's Communities Team delivers activity locally both in respect of responding to issues reported on a daily basis and creating and coordinating medium and longer-term projects that aim to reduce crime and improve public safety, gathering intelligence and disrupting activity where appropriate.

9.2 In support of its corporate objectives, the Communities Team facilitates and leads the Broxtowe Complex Cases Panel. This has a very broad membership including the Exploitation Officer for South Nottinghamshire and its key priority is to ensure that all agencies are working together to share intelligence, help identify adults at risk and agree actions that can be taken to provide tailored support. Where this panel identifies potential abuse or slavery, the necessary enforcement agencies are informed and referrals made to local and national support agencies.

9.3 Safeguarding reports may also flag exploitation and where the Safeguarding Lead identifies potential abuse or slavery, the necessary enforcement agencies are informed and referrals made to local and national support agencies.

In 2023 Sections of the Modern Slavery Act 2015 were amended so that assistance and support are only provided when there are reasonable grounds to believe that someone is, rather than may be a victim of modern slavery.

9.4 The Communities Team also coordinates and manages the Broxtowe Neighbourhood Safeguarding and Disruption (NSD) meetings which manage young people involved in or at risk of exploitation and County Lines and refer young people into the Child Criminal Exploitation Panel (CCEP) meetings and the National Referral Mechanism (NRM).

10. Monitoring our effectiveness

10.1 The Council will use the following steps to regularly review and monitor the measures being implemented to address slavery and human trafficking and to safeguard against such activity in any part of its business or supply chains:

i) Record the number of employees provided with training on modern slavery and human trafficking;

ii) Carry out periodic reviews to identify any deficiencies within our policies and practices and take appropriate action to rectify these to strengthen our ability to address slavery and human trafficking;

ii) Carry out periodic internal audits to ensure compliance with the policy.

iii) Undertake a self-assessment using the Local Government Association's modern slavery maturity matrix, and identify further actions to improve the Council's approach.

Appendix 2

Equality Impact Assessment

The Equality Act 2010 replaces the previous anti-discrimination laws with a single Act. It simplifies the law, removing inconsistencies and making it easier for people to understand and comply with it. It also strengthens the law in important ways, to help tackle discrimination and equality. The majority of the Act came into force on 1 October 2010.

Public bodies are required in it to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited under the Act
- advance equality of opportunity between people who share a protected characteristic and people who do not share it, and
- foster good relations between people who share a protected characteristic and people who do not share it.

The public sector Equality Duty came into force on 5 April 2011. The duty ensures that all public bodies play their part in making society fairer by tackling discrimination and providing equality of opportunity for all. It ensures that public bodies consider the needs of all individuals in their day to day work – in shaping policy, delivering services and in relation to their own employees.

The Equality Duty encourages public bodies to understand how different people will be affected by their activities so that policies and services are appropriate and accessible to all and meet different people's needs. By understanding the effect of their activities on different people, and how inclusive public services can support and open up people's opportunities, public bodies are better placed to deliver policies and services that are efficient and effective.

The new equality duty replaces the three previous public sector equality duties, for race, disability and gender. The new equality duty covers the following protected characteristics:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race – this includes ethnic or national origins, colour or nationality
- religion or belief – including lack of belief
- sex
- sexual orientation.

It also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

Having due regard means consciously thinking about the three aims of the equality duty as part of the process of decision-making. This means that consideration of equality issues must influence the decisions reached by public bodies, including how

they act as employers, how they develop, evaluate and review policies, how they design, deliver and evaluate services, and how they commission and procure from others.

Having due regard to the need to advance equality of opportunity involves considering the need to:

- remove or minimise disadvantages suffered by people due to their protected characteristics
- meet the needs of people with protected characteristics, and
- encourage people with protected characteristics to participate in public life or in other activities where their participation is low.

Fostering good relations involves tackling prejudice and promoting understanding between people who share a protected characteristic and others.

Complying with the equality duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive action provisions in order to provide a service in a way which is appropriate for people who share a protected characteristic.

The Equality Duty also explicitly recognises that disabled people's needs may be different from those of non-disabled people. Public bodies should therefore take account of disabled people's impairments when making decisions about policies or services. This might mean making reasonable adjustments or treating disabled people better than non-disabled people in order to meet their needs.

There is no explicit requirement to refer to the Equality Duty in recording the process of consideration but it is good practice to do so. Keeping a record of how decisions were reached will help public bodies demonstrate that they considered the aims of the Equality Duty. Keeping a record of how decisions were reached will help public bodies show how they considered the Equality Duty. Producing an Equality Impact Assessment after a decision has been reached will not achieve compliance with the Equality Duty.

It is recommended that assessments are carried out in respect of new or revised policies and that a copy of the assessment is included as an appendix to the report provided to the decision makers at the relevant Cabinet, Committee or Scrutiny meeting.

Where it is clear from initial consideration that a policy will not have any effect on equality for any of the protected characteristics, no further analysis or action is necessary.

Public bodies should take a proportionate approach when complying with the Equality Duty. In practice, this means giving greater consideration to the Equality Duty where a policy or function has the potential to have a discriminatory effect or impact on equality of opportunity, and less consideration where the potential effect on equality is slight. The Equality Duty requires public bodies to think about people's different needs and how these can be met.

Equality Impact Assessment (EIA)

Directorate:	**Chief Executive's**	Lead officer responsible for EIA	**Head of Communities and Community Safety**
Name of the policy or function to be assessed:		**Slavery and Human Trafficking Statement 2024/25**	
Names of the officers undertaking the assessment:		**Head of Communities and Community Safety**	
Is this a new or an existing policy or function?		**Annual**	

1. **What are the aims and objectives of the policy or function?**
   It details the steps the Council has taken to understand potential modern slavery risks related to its business and to put in place measures that are aimed at ensuring that these offences are not committed in its own business or its supply chains.

2. **What outcomes do you want to achieve from the policy or function?**
   That the Council is alert to the risks of, and strives to ensure that its supply chains are free from, slavery and human trafficking.

3. **Who is intended to benefit from the policy or function?**
   The Council and all companies and individuals involved in its supply chains.

4. **Who are the main stakeholders in relation to the policy or function?**
   Council officers, Councillors, suppliers, sub-contractors, staff working for suppliers and sub-contractors, partner organisations.

5. **What baseline quantitative data do you have about the policy or function relating to the different equality strands?**
   There were 17,004 potential victims of modern slavery referred to the Home Office in 2023, a slight increase compared to the preceding year (16,921) and the highest annual number since the NRM began in 2009.
   (.gov.uk– National Referral Mechanism Statistics 2023)

6. **What baseline qualitative data do you have about the policy or function relating to the different equality strands?**
   None is published by the National Referral Mechanism

7. **What has stakeholder consultation, if carried out, revealed about the nature of the impact?**
   Stakeholder consultation has not been carried out by the National Referral Mechanism

8. **From the evidence available does the policy or function affect or have the potential to affect different equality groups in different ways?**
   Yes.
   In assessing whether the policy or function adversely affects any particular group or presents an opportunity for promoting equality, consider the questions below in relation to each equality group:

• **Does the policy or function target or exclude a specific equality group or community? Does it affect some equality groups or communities differently? If yes, can this be justified?** By the very nature of the issue it is addressing, the statement will have far more relevance for, and effectively targets, those from ethnic backgrounds who are not British born or are vulnerable due to mental health, learning disability, physical disability, age or are care leavers as they are the ones most vulnerable to exploitation and are more likely to be targeted and affected by human slavery and trafficking.
• **Is the policy or function likely to be equally accessed by all equality groups or communities? If no, can this be justified?** The statement applies equally to all equality groups
• **Are there barriers that might make access difficult or stop different equality groups or communities accessing the policy or function?** No
• **Could the policy or function promote or contribute to equality and good relations between different groups? If so, how?** By addressing the issue of slavery and trafficking, the statement sets out the Council's position and as such, will make a contribution to equality due to the problem caused for different groups with protected characteristics.
• **What further evidence is needed to understand the impact on equality?** None

9. On the basis of the analysis above what actions, if any, will you need to take in respect of each of the equality strands?
Age: Additional consideration in relation to vulnerability to modern slavery needs to be given where concerns are raised. The Neighbourhood Safeguarding and Disruption Panel (NSD) and the Child Criminal and Sexual Exploitation Panels (CCEP and MASE) are in place to address this specific issue.
Disability: Additional consideration in relation to vulnerability to modern slavery needs to be given where concerns are raised
Gender: No adverse impact has been identified
Gender Reassignment: No adverse impact has been identified.
Marriage and Civil Partnership: No adverse impact has been identified.
Pregnancy and Maternity: No adverse impact has been identified.
Race: Additional consideration in relation to vulnerability to modern slavery needs to be given where concerns are raised for those who have arrived from overseas.
Religion and Belief: No adverse impact has been identified

Sexual Orientation: No adverse impact has been identified.
Care Experience Additional consideration in relation to vulnerability to modern slavery needs to be given where concerns are raised

Chief Executive: Ruth Hyde

Signature: [redacted]

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Cabinet **29 July 2025**

Report of the Portfolio Holder for Community Safety

Approval to Consult on PSPO Renewals

1. Purpose of Report

To seek approval to consult on the renewal of the Boroughs Public Space Protection Orders.

2. Recommendation

Cabinet is asked to RESOLVE that permission to consult be approved.

3. Detail

Public Spaces Protection Orders (PSPO) are designed to deal with a nuisance affecting the whole community in a defined area by imposing conditions on the use of that area. They were introduced through the Anti-social Behaviour, Crime and Policing Act 2014 and came into effect in October 2014. Councils are responsible for making PSPO and can do so on any public space for a maximum period of 3 years. At the end of this period consultation should take place and members approve a continuation of the order or allow it to lapse.

Before making a PSPO, a Council must be satisfied, on "reasonable grounds", that there is sufficient evidence to justify an order preventing a currently lawful activity on the whole population within the defined area and that the behaviour to be restricted:

- is having, or is likely to have, a detrimental effect on the quality of life of those in the locality;
- is, or is likely to be, persistent or continuing in nature;
- is, or is likely to be, unreasonable; and
- justifies the restrictions imposed.

Ten PSPO are currently in place in Broxtowe, six for the control of ASB related to alcohol consumption, two for car cruising, one for dog control and one for the closure of a footpath. In December 2020, all PSPO in the Borough were aligned and the six relating to alcohol consolidated to allow for more efficient management.

The consultation will cover members, stakeholders and members of the public.

4. Key Decision

This report is a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as it will be significant in terms of its effects on

communities living or working in an area comprising two or more Wards or electoral divisions in the Council's area.

5. Updates from Scrutiny

There are no updates from Scrutiny.

6. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

There are no additional financial implications to consider at this stage with costs being contained within existing budgets. Any significant budget implications in the future, over and above virement limits, would require approval by Cabinet.

7. Legal Implications

The comments from the Monitoring Officer / Head of Legal Services were as follows:

The Council is required to carry out the necessary consultation before making a PSPO and this must include consulting with "the chief officer of police, and the local policing body, for the police area that includes the restricted area" and with appropriate community representatives and those who own or occupy land within the restricted area.

The Council must also notify the local parish councils within the affected area. Before reaching a decision in relation to the extension of the PSPO and its implementation in the revised terms proposed, The Council must conscientiously consider the results of consultation.

8. Human Resources Implications

Not applicable.

9. Union Comments

Not applicable.

10. Climate Change Implications

The climate change implications are contained within the report.

11. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    Not applicable.

13. Background Papers

    Nil.

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Cabinet **29 July 2025**

Report of the Portfolio Holder- Economic Development and Asset Management

High Street Retail Auctions Eastwood Extension and Update

1. Purpose of Report

This is a noting report to update Members on the work that has now commenced in bringing in this new pilot measure into Eastwood.

2. Recommendation

Cabinet is asked to NOTE the report.

3. Detail

This report details the progress of the Eastwood High Street Rental Auctions (HSRA) as indicated above. The **appendix** is the planned Eastwood Designated Area and a summary of the key points on the new process. The Stapleford HSRA initiative is moving significantly forward in the process and it is thought timely to use the new powers for the improvement of Eastwood. The Ministry for Housing, Communities and Local Government (MHCLG) recommends the minimum vacancy rate for HSRA is 7% and Eastwood town centre meets that need with a vacancy rate of over 12%. Approval has already been gained from MHCLG to start the process of establishing an HSRA Designated Area in Eastwood. A Vacancy Register will be outsourced to a surveyor (to be refunded by MHCLG) taking around 21 days. Quotes are being sought. The 'Vacancy Condition' (i.e. a property is unoccupied continuously for 12 months or for at least 366 days non-continuously within a 24-month period) will need to be met and officers anticipate around 12 premises will be included.

A 28-day minimum Community Engagement Period on the Eastwood HSRA Designated Area will be conducted. The launch of the Community Engagement Period is at the Eastwood Town Council meeting on Monday 28 July. After the Community Engagement Period, the Notice Period will be 12 weeks, followed by an Auction Period of 12 weeks. New Burdens Grant and Refurbishment Costs can be drawn down from MHCLG during Notice and Auction Periods.

4. Key Decision

This report is not a key decision as defined under Regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

5. Updates from Scrutiny

This report has not been through Policy Overview Working Group or Overview and Scrutiny Committee.

6. Financial Implications

   The comments from the Assistant Director Finance Services were as follows:

   There are no additional financial implications for the Council at this stage with any costs being contained within existing budgets. New Burdens Funding grants can be claimed from MHCLG during Notice Periods and Auction Periods. Any significant budget implications in the future, over and above virement limits, would require approval by Cabinet.

7. Legal Implications

   The comments from the Head of Legal Services were as follows:

   There are legal aspects in relation to the preparation of legal documentation. MHCLG has produced a toolkit of document templates to support this process and the New Burden payment to cover costs incurred on issuing notices and to gain access to premises, where needed.

8. Human Resources Implications

   The comments from the Human Resources Manager were as follows:

   Not applicable.

9. Union Comments

   The Union comments were as follows:

   Not applicable.

10. Climate Change Implications

    The climate change implications are contained within the report.

11. Data Protection Compliance Implications

    This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

12. Equality Impact Assessment

    Not applicable.

13. Background Papers

    Nil.

Planned Eastwood High Street Rental Auction (HSRA) Designated Area



- MHCLG recommended minimum vacancy rate 7%.
- Eastwood **vacancy rate** over **12%**.
- **Vacancy Register** to be outsourced to surveyor (in order to be refunded by MHCLG) - **21 days**.
- **'Vacancy Condition'** (unoccupied continuously for 12 months or for at least 366 days non-continuously within a 24-month period) - **anticipate 12 premises**.
- **Approval already** gained **from MHCLG** to start process of establishing additional HSRA Designated Area.
- **28-day minimum Community Engagement Period on the Eastwood HSRA Designated Area** - Involving: writing to all high street owners; flyers in town centre locations; posters on notice boards; social media. **Launch** of the Community Engagement is at the **Eastwood Town Council meeting** on **Monday 28 July**.
- Followed by Notice Period - 12 weeks.
- Then Auction Period - 12 weeks.
- New Burdens Grant and Refurbishment Costs can be drawn down from MHCLG during Notice and Auction Periods.

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Cabinet **29 July 2025**

Report of the Leader of the Council

Cabinet Work Programme

1. Purpose of Report

Cabinet is asked to approve its Work Programme, including potential key decisions that will help to achieve the Council's key priorities and associated objectives.

2. Recommendation

Cabinet is asked to RESOLVE that the Work Programme, including key decisions, be approved.

3. Detail

The Work Programme for future meetings is set out below. Key decisions and exempt items are marked with *.

2 September 2025	• Irrecoverable Arrears *Exempt • Alterations and Improvement Policy • Housing University Study EG • Local Government Reorganisation Update • Damp and Mould Policy
30 September 2025	• Budget Timetable and Consultation 2026/27 • Grants to Voluntary and Community organisations • Local Government Reorganisation Update. • Asset Management Policy
4 November 2025	• Medium Term Financial Strategy and Business Strategy • Capital Programme Update 25/26 • Complaints Report • Blue/Green Infrastructure • Broxtowe Design Code Householder Development • Local Government Reorganisation Update

4. Key Decisions

This is not key decision.

5. Financial Implications

There are no additional financial implications.

6. Legal Implications

   The terms of reference are set out in the Council's constitution. It is good practice to include a work programme to help the Council manage the portfolios.

7. Human Resources Implications

   There are HR implications purely from the point of view of clarifying roles and responsibilities of Council Officers and responsibilities of partner agencies.

8. Union Comments

   There were no comments received.

9. Climate Change Implications

   There were no comments received.

10. Data Protection Compliance Implications

    This report does not contain OFFICIAL(SENSITIVE) information. There are no Data Protection issues in relation to this report.

11. Equality Impact Assessment

    There are no Equality Impact Assessment issues.

12. Background Papers

    Nil

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