



24 February 2025

CABINET – 4 MARCH 2025

A meeting of Cabinet will be held at 6.00pm on Tuesday 4 March 2025 in the Council Chamber at the Town Hall, Rugby.

Members of the public may also view the meeting via the livestream available on the Council's website.

Dan Green
Acting Chief Executive

AGENDA PART 1 – PUBLIC BUSINESS

1. Minutes.

To confirm the minutes of the meeting held on 3 February 2025.

2. Apologies.

To receive apologies for absence from the meeting.

3. Declarations of Interest.

To receive declarations of –

(a) non-pecuniary interests as defined by the Council's Code of Conduct for Councillors;

(b) pecuniary interests as defined by the Council's Code of Conduct for Councillors; and

(c) notice under Section 106 Local Government Finance Act 1992 – non-payment of Community Charge or Council Tax.

Note: Councillors are reminded that they should declare the existence and nature of their interests at the commencement of the meeting (or as soon as the interest becomes apparent). If that interest is a prejudicial interest, the Councillor must withdraw from the room unless one of the exceptions applies.

Membership of Warwickshire County Council or any Parish Council is classed as a non-pecuniary interest under the Code of Conduct. A Councillor does not need to declare this interest unless the Councillor chooses to speak on a matter relating to their membership. If the Councillor does not wish to speak on the matter, the Councillor may still vote on the matter without making a declaration.

4. Question Time.

Notice of questions from the public should be delivered in writing or by e-mail to the Chief Executive at least three clear working days prior to the meeting (no later than Wednesday 26 February 2025).

Growth and Investment, Digital and Communications Portfolio

5. Economic Strategy 2025-2035 consultation.

6. Local Plan Preferred Option Consultation.

Partnerships and Wellbeing Portfolio

Nothing to report to this meeting.

Finance, Performance, Legal and Governance Portfolio

7. Non Domestic Rate Discretionary Rate Relief

8. Calendar of Meetings 2025/26.

Communities, Homes, Regulation and Safety Portfolio

9. Proposed Housing Allocations Policy 2025.

10. Homelessness Strategy and Action Plan 2025-2029.

Operations and Traded Services Portfolio

Nothing to report to this meeting.

Organisational change Portfolio

Nothing to report to this meeting.

The following item contains reports which are to be considered en bloc subject to any Portfolio Holder requesting discussion of an individual report

Nothing to report to this meeting.

11. Motion to Exclude the Public under Section 100(A)(4) of the Local Government Act 1972.

To consider the following resolution:

“under Section 100(A)(4) of the Local Government Act 1972 the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of information defined in paragraphs 2 and 3 of Schedule 12A of the Act.”

PART 2 – EXEMPT INFORMATION

Growth and Investment, Digital and Communications Portfolio

Nothing to report to this meeting.

Partnerships and Wellbeing Portfolio

Nothing to report to this meeting.

Finance, Performance, Legal and Governance Portfolio

1. Revenues and Benefits Team Service transformation.

Communities, Homes, Regulation and Safety Portfolio

2. Homes England Compliance Audit Report.

Operations and Traded Services Portfolio

Nothing to report to this meeting.

Organisational change Portfolio

Nothing to report to this meeting.

The following item contains reports which are to be considered en bloc subject to any Portfolio Holder requesting discussion of an individual report

3. Urgent Decision under Delegated Powers – Purchase of land.

Any additional papers for this meeting can be accessed via the website.

The Reports of Officers are attached.

Membership of Cabinet:

Councillors Moran (Chair), Brown, C Edwards, Livesey, Mistry, O'Rourke and Robinson.

CALL-IN PROCEDURES

Publication of the decisions made at this meeting will normally be within three working days of the decision. Each decision will come into force at the expiry of five working days after its publication. This does not apply to decisions made to take immediate effect. Call-in procedures are set out in detail in Standing Order 15 of Part 3c of the Constitution.

If you have any general queries with regard to this agenda please contact Claire Waleczek, Democratic and Support Services Manager (01788 533524 or e-mail claire.waleczek@rugby.gov.uk). Any specific queries concerning reports should be directed to the listed contact officer.

AGENDA MANAGEMENT SHEET

Report Title:	Economic Strategy 2025-2035 Consultation
Name of Committee:	Cabinet
Date of Meeting:	4 March 2025
Report Director:	Chief Officer - Growth and Investment
Portfolio:	Growth and Investment, Digital and Communications
Ward Relevance:	All
Prior Consultation:	Economic Strategy Working Group
Contact Officer:	Jon Hinde – Economic Lead jon.hinde@rugby.gov.uk
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	<p>This report relates to the following priority(ies):</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives.<input checked="" type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.<input checked="" type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.<input checked="" type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough. <p>Corporate Strategy 2025-2035</p> <p><input type="checkbox"/> This report does not specifically relate to any Council priorities but</p>
Summary:	The report seeks Cabinet’s approval of the Economic Strategy (Appendix 1) for public consultation.
Financial Implications:	There are no specific financial implications. Any costs incurred in the consultation of the document will be met from existing budgets.

Risk Management/Health and Safety Implications:	There are no Health and Safety / Risk Management issues identified through the development of an Economic Strategy for the Borough.
Environmental Implications:	A completed Climate Change and Environmental Impact Assessment is attached at Appendix 2. The strategy would have a positive impact on the Council's ambitions to reduce the impact of climate change through positive interventions.
Legal Implications:	There are no legal implications arising directly from this report.
Equality and Diversity:	A completed Equality Impact Assessment is attached at Appendix 3. The strategy will result in a positive impact on equality.
Options:	<ul style="list-style-type: none"> i. To agree to a 30 day consultation period for the economic strategy as reported, or ii. To not progress with consulting on the economic strategy.
Recommendation:	<p>(1) The Economic Strategy at Appendix 1 be approved for a 30 day consultation; and</p> <p>(2) the Chief Officer for Growth and Investment in consultation with the Portfolio Holder for Growth & Investment and Digital & Communications be granted delegated authority to make amendments and corrections as necessary to the Economic Strategy prior to its publication for consultation.</p>
Reasons for Recommendation:	To allow for a period of further consultation before the strategy is put forward for adoption by Council.

Cabinet - 4 March 2025

Economic Strategy 2025 - 2035

Public Report of the Chief Officer for Growth and Investment

Recommendation

- (1) The Economic Strategy at Appendix 1 be approved for a 30 day consultation;
- (2) the Chief Officer for Growth and Investment in consultation with the Portfolio Holder for Growth & Investment and Digital & Communications be granted delegated authority to make amendments and corrections as necessary to the Economic Strategy prior to its publication for consultation.

1. Executive Summary

- 1.1 A draft Rugby Borough Council Economic Strategy 2025 – 2035 has been produced. This will be circulated as Appendix 1 separately to all Members.
- 1.2 Development of the draft strategy has been overseen by a cross-party Economic Strategy Member Working Group (ESWG).
- 1.3 This is the first Rugby Borough Council Economic Strategy and production of the strategy is considered essential to setting the trajectory for economic growth of the Rugby economy for the next 10 years.
- 1.4 By adopting a detailed strategy that sets the course for economic growth of the Borough over the next 10 years it is intended to raise awareness of the current strengths, weaknesses, opportunities and threats of the local economy and to prioritise areas for delivery to address the issues identified
- 1.5 This report is seeking Cabinet’s authority to undertake a 30 day public consultation on the draft Economic Strategy 2025 - 2035. Following completion of the public consultation, and any appropriate amendments made as a result of feedback, it is proposed that the updated strategy will be taken back to the Cabinet and Council to be adopted.

2. Background

- 2.1 The Corporate Strategy seeks to deliver a thriving economy which brings borough-wide investment and regenerates Rugby town centre. One of the ways in which this priority will be delivered is to develop an Economic Strategy. The strategy will have a 10-year time horizon but will be subject to periodic reviews.

- 2.2 There will be a supporting action plan that will have both short and longer-term actions. The strategy has been produced to take account of the wider strategic context and economic landscape in which the economy of Rugby operates and key drivers for change which will impact on the economy. This is a time of rapid change and the strategy and action plan need to be agile and responsive to that change. The strategy needs to inform and link national and regional priorities with local imperatives to optimise the impact for Rugby the place, its residents, and businesses
- 2.3 The strategy sets out a clear set of priorities and realistic actions for Rugby Borough Council and its partners and can be used to influence other relevant strategies and policies, lobby for additional public sector resources, secure inward investment and ensure that interventions and actions have a strong Rugby focus.
- 2.4 The strategy will be the document that sets the route map for future partnership engagement and guides external organisations in the interventions necessary to support a prosperous and healthy economy for Rugby.
- 2.5 The development of the draft strategy has been overseen by a cross-party Economic Strategy Member Working Group (ESWG). The strategy has also been informed by consultations with individual businesses, business representation groups, developers and land owners and internal colleagues.
- 2.5 The strategy clearly identifies 3 main themes that underpin all identified objectives, outcomes and priorities for delivery:

Resident Rugby: Residents are at the very heart of the new Economic Strategy. It sets an aspiration to provide skilled employment and upskilling opportunities, address pockets of rural and urban deprivation, enhance the town centre offering and provide a healthy, clean and safe environment for all.

Business Rugby: The strategy sets the foundations for creating a prosperous environment where every Rugby Borough business can thrive and grow whilst at the same time encouraging new high skill, high growth businesses will be a key outcome in the successful delivery of the strategy.

Growth Rugby: We know that Rugby Borough is already experiencing rapid population growth, and we need to ensure this growth trajectory is matched in every aspect of the local economy. We need to build on our existing strong foundations, whilst working towards a fairer, better, greener and more sustainable future that makes Rugby Borough a place people want to live, work, visit and invest.

- 2.6 For the 3 main themes there are accompanying priorities for delivery and the strategy identifies what activities we will undertake to unlock each of these opportunities.
- 2.7 All economic data and analysis referenced in the strategy is taken directly from the Office for National Statistics (ONS).

- 2.8 The strategy will be supported by a series of 1–3-year action plans which will provide further detail and insight into the phasing of activity and the related performance targets.
- 2.9 Robust monitoring and evaluation are a critical component of delivering the strategy. It will provide the Council with the tools to communicate the progress and showcase evidence of the impact to help leverage the necessary additional investment into the borough.
- 2.10 This robust data will be open to scrutiny and accountability from all stakeholders, with whom we will work collaboratively to share learning and develop additional data collection processes where required to ensure the full impact on our residents, businesses and communities is understood.

3. Next steps:

- 3.1 It is proposed that the draft Economic Strategy go out for a 30 day period of public consultation via the Rugby Borough Council website. This additional period of consultation will allow for further comment from residents, community groups and other interested parties to be submitted.
- 3.2 Following completion of the public consultation, it is proposed that a final version of the Rugby Borough Council Economic Strategy be brought to Cabinet and Council for adoption.

Name of Meeting: Cabinet
Date of Meeting: 4 March 2025
Subject Matter: Economic Strategy 2025 - 2035 consultation
Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action. Rugby Borough Council declared a climate emergency in 2019, in doing so committed to:

- To move the Council's operations towards Carbon Neutrality by 2030.
- To establish action to tackle climate change as a key driver of all decision-making.
- To provide community leadership in reducing the impact of Climate Change.
- To take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.

The Council's Corporate Strategy (2021-2024) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes carbon emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to the Deputy Chief Executive.

If you require help, advice and support to complete the form, please contact Dan Green, Deputy Chief Executive.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment
Policy/Service/Change being assessed	RBC Economic Strategy 2025 - 2035
Is this a new or existing Policy/Service/Change?	This is a new economic strategy
If existing policy/service please state date of last assessment	N/A
Ward Specific Impacts	Relevant to entire Borough
Summary of assessment Briefly summarise the policy/service/change and potential impacts	<p>The new RBC Economic Strategy 2025 – 2035 identifies and highlights the environmental impacts of a developing economy, and adapting to climate change is a key cross cutting theme throughout the strategy.</p> <p>There is direct reference in the Economic Strategy to the RBC Climate Change Strategy with a link provided and direct reference to the Council aspiration of achieving its ambitious goal of achieving Net Zero council greenhouse gas emissions by 2030.</p> <p>The strategy takes into account a number of environmental factors and identifies a clear strategic direction regarding these matters moving forward.</p>
Completed By	Jon Hinde – Interim Economic Development Lead
Authorised By	Nicola Smith – Chief Officer for Growth and Investment
Date of Assessment	23 rd January 2025

SECTION 2: IMPACT ASSESSMENT

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Energy usage	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The strategy states: We want to look to a future where Rugby can identify itself as a green and sustainable borough. We know that due to our location and related business activities, our close motorway connections and high volume of logistics we are at risk of pollution and poor air quality. Therefore, the strategy looks to support more sustainable, greener and environmentally friendly travel plans and the open up of green corridors, particularly in and around the town centre.	The identification of green routes and alternative forms of travel are intended to mitigate any identified negative impacts	Economic Development Team	Ongoing
Fleet usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable Transport/Travel (customers and staff)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	An overarching aim within the strategy is to support a greener, more sustainable transport network. This will be equally applicable to	The identification of green routes and alternative forms of travel are intended to mitigate any identified negative impacts	Economic Development Team	Ongoing

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
				<p>customers and staff as it is residents and businesses.</p> <p>To further support this, the strategy states: Any measure that reduces the need for individuals to drive to and from places is to be encouraged to support a reduction in air pollution but ultimately the aim must be the creation of safe cycling routes and green corridors where local people can easily get to work, go shopping and enjoy leisure and recreational activities both by bike and on foot.</p>			
Sustainable procurement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The strategy states: It is essential to the future of this strategy and the creation of a green and sustainable borough that we acknowledge the risks and work hard to offset these through positive action and dedicated resource in support of a Borough-wide circular	The identification of the need to buy local and support a Rugby circular economy will ultimately support more sustainable procurement practices.	Economic Development Team	Ongoing

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
				economy that encourages an ethos of buy local and use and reuse.			
Community leadership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>There is clear and obvious support from both members and senior officers for an Economic Strategy for the Borough. This is identified from the outset with a supporting foreword endorsed by members and within the strategy itself where it states:</p> <p>The strategy has a specific priority action regarding stronger community collaboration, and states: We recognise that stronger community collaboration will be important to supporting a thriving economy, where equality of opportunity is provided to all residents in</p>	It can only be considered as a positive that the strategy identifies the strong leadership ambitions of the Council in delivering the strategy along with the clear intention to create strong and meaningful community partnerships.	Economic Development Team	Ongoing

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
				<p>accessing core services such as housing, transport, leisure and cultural facilities, employment opportunities, financial advice, legal support and education and lifelong learning.</p> <p>We want to be a key facilitator of this collaboration and ensure it is provided in the right place at the right time to allow access to as many members of the community as possible. We want to help create a culture where groups become self-supporting and self-sustaining, identifying issues specific to their location and informing on future service needs and requirements.</p>			

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Biodiversity and habitats	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Impact on other providers/partners	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The strategy acknowledges the need to work with partners in delivering successful outcomes, and states: We fully acknowledge that all of this cannot be achieved through the work of the Borough Council alone.</p> <p>We want to capitalise on and build momentum through developing further our key public / private sector partnerships and to identify the different roles we can play as a partner, facilitator, enabler and where necessary leader.</p>	Working closer with partners in both the consultation and delivery of the strategy can only be a positive for the future prosperity of the Rugby economy	Economic Development Team	Ongoing

SECTION 3: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	April 2026
Key points to be considered through review	Positive outcomes of the strategy on the identified climate change and environmental impacts
Person responsible for review	Economic Development Manager
Authorised by	Chief Officer – Growth and Investment

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Growth and Investment
Policy/Service being assessed	RBC Economic Strategy 2025 - 2035
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	This is a new strategy to Rugby Borough Council
EqlA Review Team – List of members	Nicola Smith – Chief Officer, Growth and Investment
Date of this assessment	23rd January 2025
Signature of responsible officer (to be signed after the EqlA has been completed)	Nicola Smith

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Chief Officer for Legal and Governance.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The Economic Strategy 2025 - 2035 sets a vision and priorities for the Council Economic Development function. It will lead to the production of subsequent action plans that will inform future service delivery.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	The Economic Strategy demonstrates alignment with the new Corporate Strategy 2025 – 2035 and identifies the corporate strategy as the golden thread that brings together all other RBC strategy documents.
(3) What are the expected outcomes you are hoping to achieve?	<p>There are 3 identified core themes within the strategy all with supporting objectives and outcomes:</p> <p>Resident Rugby Objective: Helping people to succeed where they live Outcome: Increased economic activity, apprenticeship participation and raised skill levels in residents as a proportion of the total workforce</p> <p>Business Rugby Objective: Enabling every business to reach their potential Outcome: A growing and diverse business base and retention of existing Rugby businesses through the provision of employment space to meet demand</p> <p>Growth Rugby Objective: Growth with purpose to the benefit of all Outcome: Increased prosperity for all, measured through gross disposable income, business rates and visitor spend</p>

<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>Successful delivery of the strategy will have a positive impact on customers, businesses, community groups and partner organisations in the Borough.</p>
<p>(5) Will the policy or decision involve substantial changes in resources?</p>	<p>Yes - The Growth and Investment service has recently undertaken an extensive recruitment exercise to recruit 3 new members of staff that will become the economic development function of the Council with responsibility for delivering the actions and priorities identified within the new RBC Economic Strategy.</p>
<p><u>Stage 2 – Evidence about user population and consultation</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>

(1) What does the data tell you about the groups this policy or decision impacts?

Possible data sources:

- national statistics/census data
- local statistics
- evaluations
- analysis of complaints
- user feedback
- outcomes from consultation/community voice
- Council published information, service data
- [District and Ward Profile – Warwickshire Observatory](#)
- [Office of National Statistics](#)
- [Fingertips health profiles](#)
- [Indices of Multiple Deprivation](#)
- [RBC Annual Workforce Equality Report](#)

The economic intelligence gathered in support of the strategy tells us that:

- Rugby had a total of 114,835 usual residents residing in 47,016 households, indicating an average household size of 2.4.
- The average age of borough residents is 40.6 years.
- There are disparities in levels of economic activity between men (88.3%) and women (66.7%) with female gross weekly pay correspondingly also lower. Latest research by the UN shows globally this figure is 91% of men and 61% of women are actively participating in the labour market. Through implementing the strategy there is a commitment to promoting more flexible learning and employment opportunities to create quality flexible employment that allows women and men to balance ambition with other out of work responsibilities.
- There are 5,225 businesses in Rugby Borough
- Average workplace earnings in Rugby are £34,731 per annum
- At 2.4% unemployment in Rugby is lower than Warwickshire at 2.6% and Great Britain at 3.7%
- The predominant ethnic group in Rugby is 'White', constituting 85.7% of the total population. The 'Asian, Asian British or Asian Welsh' ethnic group is second largest, making up 7.63%, while 'Mixed or Multiple ethnic groups' accounts for 2.8%. There is no evidence to suggest employment rates differ amongst ethnic groups.
- The majority of the population are in very good health. Most common age groups are those aged 35 to 49 years and aged 50 to 64 years. 3% of those economically inactive are due to long term sickness or disability.

<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>There has been extensive consultation during the development stages of the strategy. Consultees being existing Rugby businesses, business support providers, community groups and cross party members.</p> <p>Findings from this consultation have been clearly articulated within each update of the draft strategy.</p> <p>It has been identified for example that existing Rugby businesses find it very difficult to find grow on space within the borough that results in many having to leave to find suitable premises. This has been made a key action that will be addressed during the life of the strategy.</p> <p>Access to available business and skills support has also been identified when talking to local businesses and again this has been identified as an action within the strategy.</p> <p>The consultation identified that learning opportunities need to be more flexible to meet the needs of residents and their existing lifestyle commitments, therefore the strategy identifies the need for closer engagement with providers of learning to ensure more flexible learning options are made available in the future.</p> <p>Cross party member consultation and input from the economic strategy working group proved instrumental in determining the priorities identified to unlock the opportunities under the 3 core themes.</p>		
<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>This cabinet paper is seeking authority to undertake a 30 day period of public consultation in order to further inform the strategy prior to formal adoption.</p>		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified</p>	<p>Protected Characteristic</p>	<p>Nature of Impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>

<p>for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	<p>Age</p>	<p>No specific impacts in adopting the Economic Strategy, however subsequent action plans and projects will be cognisant of the 3 key priorities. All 3 have the potential for age specific implications, for example ensuring wellbeing for older people, supporting learning opportunities for younger people or addressing climate issue for future generations. It is therefore essential that age related implications are considered in all future work arising from the Economic Strategy</p>	<p>Low</p>
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	Disability	Through production of the strategy there have been no identified impacts that could amount to discrimination. The strategy does however identify specific actions (e.g. access to learning opportunities) relating to a variety of matters which could disproportionately impact on people with disabilities. It is therefore essential that disability is considered in all future actions arising from the economic strategy. As part of the support provided by the Council economic development team and our business support providers we will ensure promotion of the Disability Confident Employer Scheme to our local businesses.	Low
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	Sex	<p>Evidence obtained from the Office of National Statistics demonstrates disparities in levels of economic activity between men (88.3%) and women (66.7%) with female gross weekly pay correspondingly also lower.</p> <p>It is noted that through implementation of the strategy there is a commitment to promoting more flexible learning and employment opportunities to create quality flexible employment that allows women and men to balance ambition with other out of work responsibilities.</p>	Medium
	Gender reassignment	<p>Through production of the strategy there have been no identified impacts that could amount to discrimination</p>	Low

	Marriage/civil partnership	Through production of the strategy there have been no identified impacts that could amount to discrimination	Low
	Pregnancy/maternity	Through production of the strategy there have been no identified impacts that could amount to discrimination	Low
	Race	Through production of the strategy there have been no identified impacts that could amount to discrimination	Low
	Religion/belief	Through production of the strategy there have been no identified impacts that could amount to discrimination	Low
	Sexual Orientation	Through production of the strategy there have been no identified impacts that could amount to discrimination	Low
(2) <u>Cross cutting themes</u>	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high

<p>(a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?</p>	<p>Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition</p>	<p>The strategy identifies 2 wards within the Borough (Benn, Newbold and Browsover) that are designated in the top 20% on the indices of deprivation in England and Wales. Future action plans arising from the strategy along with dedicated consultation with residents within these wards will look to support specific activities, particularly in relation to employment and learning support.</p>	<p>High</p>
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	<p>Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution</p>	<p>The strategy is focused upon creating a stronger economy for the borough. To achieve this a number of themes are identified, these include; improving access to services be they employment, learning or health; improving air quality through alternative methods of transport and reducing the necessity for car journeys; improving green corridors for ease of alternative forms of transport; and building on the excellent connectivity enjoyed by the borough through its position within the golden triangle</p>	<p>High</p>
<p>(3) Using the information gathered in stages 2 and 3, what will the positive impact of the strategy/policy be on equality?</p>	<p>Promoting opportunity for all is a constant throughout the economic strategy. Specific references are made to:</p> <ul style="list-style-type: none"> • Achieve a more sustainable economy for all, where our natural environment, people and businesses are thriving. • A healthier Rugby where we support people to live healthier, longer and more independent lives • To support a thriving economy, where equality of opportunity is provided to all residents in accessing core services such as housing, transport, leisure and cultural facilities, employment opportunities, financial advice, legal support and education and lifelong learning. 		

<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>Potentially language and literacy. We will ensure that any related communications and publicity are provided in a manner which is understood by speakers of other languages. It should also be recognised that the strategy identifies and acknowledges those with lower literacy levels and specific actions are identified to support residents overcome such barriers when seeking training and employment opportunities.</p>
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>Robust monitoring and evaluation are a critical component of delivering the strategy. It will provide us with the tools to communicate our progress and showcase evidence of impact to help leverage the necessary additional investment into the borough.</p> <p>This robust data will be open to scrutiny and accountability from all stakeholders, with whom we will work collaboratively to share learning and develop additional data collection processes where required to ensure the full impact on our residents, businesses and communities is understood.</p> <p>Examples of the types of data we will look to collect are:</p> <ul style="list-style-type: none"> New jobs created (by age, gender, ethnicity) Jobs safeguarded (by age, gender, ethnicity) Skills attainment (by age, gender, ethnicity) Business supported (by sector and ward) New business start ups (by age, gender, ethnicity, business type) Community groups supported (by ward)

<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	<p>No adverse impacts or discrimination were identified as a result of producing a new Economic Strategy for the borough.</p>
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<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Action</th> <th style="width: 20%;">Lead Officer</th> <th style="width: 20%;">Date for completion</th> <th style="width: 20%;">Resource requirements</th> <th style="width: 20%;">Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring</p> <p>State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>																														

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’

AGENDA MANAGEMENT SHEET

Report Title:	Local Plan Preferred Option Consultation
Name of Committee:	Cabinet
Date of Meeting:	4 March 2025
Report Director:	Chief Officer - Growth and Investment
Portfolio:	Growth and Investment, Digital and Communications
Ward Relevance:	All
Prior Consultation:	Planning Services Working Group 29 January 2025
Contact Officer:	Neil Holly, Development Strategy Manager, neil.holly@rugby.gov.uk
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	<p>This report relates to the following priority(ies):</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives.<input checked="" type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.<input checked="" type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.<input checked="" type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough. <p>Corporate Strategy 2025-2035</p> <p><input type="checkbox"/> This report does not specifically relate to any Council priorities but</p>
Summary:	The report seeks Cabinet’s recommendation to Council to approve the Rugby Borough Local Plan Preferred Option draft (Appendix 1) and policies map update (hyperlink to Local Plan policies map to follow with Appendix 1) for public consultation.
Financial Implications:	The costs of the consultation will be met from within existing budgets.

Risk Management/Health and Safety Implications:	An updated project risk register for the new Local Plan is attached as Appendix 3.
Environmental Implications:	A climate change and environmental impact assessment is attached as Appendix 4.
Legal Implications:	The consultation on the Preferred Option Local Plan would be undertaken under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.
Equality and Diversity:	An equality impact assessment is attached as Appendix 5.
Options:	<p>Option 1- Cabinet recommends to Council that it approves the Preferred Option Local Plan and policies map for an eight-week public consultation. This is the recommended option.</p> <p>Option 2 – Cabinet recommends to Council that it does not publish the Preferred Option consultation and instead delays while further evidence is gathered. This option would require an amended Local Development Scheme to be brought back to Cabinet and Council at the next available opportunity.</p>
Recommendation:	<p>IT BE RECOMMENDED TO COUNCIL THAT –</p> <ol style="list-style-type: none"> (1) the Preferred Option Local Plan attached as appendix 1 and policies map be approved for an eight-week public consultation. (2) delegated authority be given to the Chief Officer for Growth and Investment to make amendments and corrections as necessary to the Preferred Option Local Plan prior to its publication for consultation. (3) delegated authority be given to the Chief Officer for Growth and Investment to publish evidence documents and topic papers as part of the consultation. (4) delegated authority be given to the Chief Officer for Growth and Investment to, in liaison with the portfolio holder, agree a list of locations for in-person consultation events.

**Reasons for
Recommendation:**

To allow the preparation of the new Local Plan to progress to the next stage in line with the Local Development Scheme.

Cabinet - 4 March 2025

Local Plan Preferred Option Consultation

Public Report of the Chief Officer - Growth and Investment

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT –

- (1) the Preferred Option Local Plan attached as appendix 1 and policies map be approved for an eight-week public consultation.
- (2) delegated authority be given to the Chief Officer for Growth and Investment to make amendments and corrections as necessary to the Preferred Option Local Plan prior to its publication for consultation.
- (3) delegated authority be given to the Chief Officer for Growth and Investment to publish evidence documents and topic papers as part of the consultation.
- (4) delegated authority be given to the Chief Officer for Growth and Investment to, in liaison with the portfolio holder, agree a list of locations for in-person consultation events.

1 Executive Summary

- 1.1 This report is for the next stage of preparation of the local plan in line with the adopted Local Development Scheme, the preferred options consultation. It seeks authority to consult on a draft plan and policies map (appendix 1).
- 1.2 The draft plan comprises both development management policies and site allocations. Section 4 below identifies those development management policies that introduce new requirements/topics.
- 1.3 Sections 5 and 6 detail how the housing and employment land requirements for the new plan are calculated.
- 1.4 Sections 7, 8, 9 and 10 describe the process by which site allocations were selected and the reasons for the preferred spatial strategy.
- 1.5 Section 11 identifies the evidence to support the new plan that will be published alongside the public consultation and the evidence that will be needed but is not yet ready.
- 1.6 Finally, section 12 outlines the consultation process and the next steps thereafter.

2 Background

- 2.1 In December 2022 Council agreed to proceed with a full update to the Local Plan. Between 30 October 2023 and 2 February 2024 an 'Issues and Options' consultation.
- 2.2 On 16 October 2024 Council approved an updated Local Development Scheme (see background documents) setting out a revised timetable for production of the new local plan. The next stage in that timetable is a preferred options consultation in March 2025.
- 2.3 This report includes the following appendices:
 - Appendix 1 – Local Plan Preferred Option draft. We have not yet received local highway authority comments from Warwickshire County Council on all of the draft site allocations. The remaining comments are expected shortly and will be incorporated into the draft Local Plan which will be circulated separately to Members as soon as possible.
 - Appendix 2 – Local Plan Issues and Options consultation report
 - Appendix 3 – Project risk register
 - Appendix 4 – Climate change and environmental impact assessment
 - Appendix 5 – Equality Impact Assessment
 - Appendix 6 – Draft Communications Plan

3 Local Plan issues and options consultation report

- 3.1 The report on the consultation undertaken between October 2023 and February 2024 is attached as Appendix 2. The consultation received 274 formal written consultation responses.
- 3.2 The consultation sought opinions on seven main issues land for employment uses, pitches for gypsies and travellers, houses in multiple occupation, climate change policies, design coding, land for housebuilding. Responses are summarised by question.
- 3.3 The consultation did not propose specific sites, instead identifying a range of possible broad locations. There was very little consensus on these, with many comments for and against locations.
- 3.4 By contrast, some specific proposals were made for new development management policies which attracted broad (although not unanimous) support and are carried forward into the draft plan, as detailed below.

4 Development management policies

- 4.1 The draft plan at Appendix 1 contains a full set of development management policies. These policies strive for clarity and conciseness. The following policies

represent significant additions/changes to the current local plan. The majority of these policies were proposed in the issues and options consultation in 2023 and were largely supported. Some of the main policy changes are summarised in the table below:

Policy	Key policy change
Policy CL1 Net zero buildings	Proposes a requirement for new zero buildings in line with those promoted by vanguard local authorities.
Policy CL2 Renewable energy and low carbon technology	Along with the policies map, identifies potentially suitable locations for wind energy generation, as encourages by the National Planning Policy Framework (NPPF).
Policy CL3 Water supply, quality and efficiency	Introduces new water use requirements for non-residential dwellings.
Policy CL4 Climate adaptation	Moves principles for designing for climate adaptation from the current Climate Change and Sustainable Design and Construction SPD into policy so that they can be given more weight.
Policy C1 Rugby town centre	Sets regeneration objectives for Rugby town centre.
Policies C3 Local and district centres and C4 Neighbourhood hubs	Identify district and local centres and neighbourhood hubs (which are shown on the policies map) alongside Rugby town centre.
Policy EN3 Ironstone Fringe Area of High Landscape Value	Identifies the Ironstone Fringe Area around Flecknoe of high landscape value based on the Landscape Character Assessment findings.
Policy EN4 Biodiversity new gain	Seeks to ensure that Biodiversity Net Gain is delivered close to the development site.
Policy EN5 Canopy cover	Seeks post-development canopy cover of at least 20% of the site area from all major developments.
Policy H7 Housing standards	Sets additional standards for new homes including the Nationally Described Space Standard and requirements for adaptable and wheelchair dwellings.
Policy H8 Houses in multiple occupation	Controls the concentration of houses in multiple occupation.
Policy W1 Protection of community facilities	Protects community facilities and outlines the council's support for the restoration of Coventry Stadium, Brandon for speedway.
Policy W2 Open space and sports provision and Appendix 2	Set updated open space standards based on updated evidence.
Policy I2 Parking and Appendix 1	Incorporate updated parking standards. The main changes are (1) the standards have been updated with current use classes (2) the high access zone has been redrawn to broadly reflect 15 minute walking isochrone from the town centre boundary. (3) Reference to high access parking zone has been deleted for use classes B2 and B8 as these are unlikely to be suitable in and around the town centre. (4) a standard for HMOs has been included (use class C4).
Policy I5 New railway stations	Supports new railway stations at Rugby Parkway and Nuneaton Parkway.

Policy	Key policy change
Policy I6 Secondary education	Allocates land at St Thomas Cross for a new secondary school north east of Rugby and provides the basis to collect s106 contributions to support the delivery of this school.

5 Housing requirement

- 5.1 The NPPF paragraph 62 states “To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.”
- 5.2 The standard method requires 618 new homes per year.
- 5.3 Paragraph 22 NPPF states that plans should look ahead over a minimum 15-year period from adoption. Adoption of the plan is anticipated to be in 2027 so the plan must run until at least 2042. To tie in with the evidence available for employment land need, the end date of the new plan will be 2045.
- 5.4 The base date for the plan is the latest date for which monitoring information is available, meaning a 2024-2045 plan period. The housing requirement over this 21-year period is for 12,978 new homes.
- 5.5 It is established practice to allocate more land than the minimum that would be needed to meet the housing requirement. A ‘buffer’ of between 5% and 10% is usually allocated to provide contingency if an allocated site doesn’t come forward or comes forward more slowly than anticipated. It also increases the likelihood of the council being able to demonstrate a five-year housing land supply throughout the plan period.
- 5.6 With a buffer, there is an overall need to identify supply for at least 13,600 new homes.
- 5.7 As detailed in draft Policy S2, we estimate that 9,746 homes are deliverable by 2045 on land that was allocated for development under the current local plan 2011-2031 and/or has planning permission. This includes future homes at Houlton, South West Rugby and Eden Park. We also estimate, based on past delivery averages of 50 homes per year, that 1,050 new homes will be completed over the 21 year plan period on sites for fewer than 5 homes.
- 5.8 Therefore, there is a residual need to allocate sites to accommodate circa **3000 new homes**.

6 Employment land requirement

- 6.1 The evidence for future employment land needs is contained in the Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HENDA), the West Midlands Strategic Employment Site Study 2024 (WMSESS) and the HEDNA-WMSESS Alignment Paper 2024 (Alignment Paper). These studies have already been published by other Coventry and Warwickshire authorities.

- 6.2 In these evidence reports the need for employment land is broken down into a 'local' employment need for industrial land on smaller sites of less than 25 hectares in area and a need for industrial land on larger 'strategic' sites.
- 6.3 The 'local' need for Rugby Borough in the period 2021-2045 identified in the Alignment Paper is 68 hectares or 272,000m² of floorspace. From this can be subtracted 6,704m² (1.7ha) of floorspace delivered on smaller sites in the period 2021-2024. That gives a requirement for 265,296m² 2024-2045 (66.3ha).
- 6.4 The 'strategic' need in the Alignment Paper and WMSESS is not identified for Rugby Brough alone but instead for 'opportunity area 7' which comprises Rugby Borough and Coventry City Council together with a small part of both Nuneaton and Bedworth Borough and Warwick District. The residual requirement to 2045 after supply (as at 2022) for area 7 is 84 hectares (294,000m²).
- 6.5 Coventry City Council does not have land to allocate further large employment sites. Only a small part of Warwick District is within opportunity area 7 and that part of the district is already allocated for development through the Coventry Gateway and Coventry Airfield schemes. Nuneaton and Bedworth's plan is already in examination awaiting the inspector's recommendations and so it is not likely that additional allocations can be added at this point.
- 6.6 Therefore, it is proposed that the 84ha/294,000m² required in opportunity area 7 to 2045 should be accommodated in Rugby Borough.
- 6.7 That figure is a net requirement after commitments as at 2022 which are listed in the Alignment Paper. To calculate the gross requirement the supply commitments for Rugby Borough listed in the Alignment Paper must be added back in. The gross commitments in Rugby Borough identified in the alignment paper are 201ha. From this can be subtracted completions on those sites in the period 2022-2024 totalling 76.11ha (adjusted to 67.5ha using a standardised 0.35 plot ratio) to bring the figures up to a 2024 base date.
- 6.8 The gross 2024-2045 requirement for large sites is 217.5ha (84ha + 201ha – 67.5ha). At a standard plot ratio of 0.35 that would equate to a gross requirement for 761,250m² in additional floorspace on strategic sites 2024-2045.
- 6.9 This 'strategic' need is added to the need for smaller 'local' sites to get an overall gross 2024-2045 industrial land requirement for 1,026,546m² of floorspace (761,250 + 265,296) or 284ha of site area.
- 6.10 Existing (planning permissions and local plan 2011-2031 allocations at 1 April 2024 across large and small sites total 286,987m² leaving a residual need to allocate land for **739,559m² of floorspace** (202.5ha in site area).
- 6.11 In the draft plan both land requirements and site allocations are measured in square metres of floorspace rather than hectares of site area. This is a more robust approach because requirements for biodiversity net gain mean that it is

difficult to predict from a gross site area, how intensively a site will be developed.

6.12 The detail behind these calculations is set out in more detail in a development needs topic paper which will be published alongside the consultation.

7 Site allocations process

7.1 Officers have been reviewing site options for accommodating the circa 3,000 homes and 740,000m² of industrial floorspace that need to be allocated.

7.2 The starting point for considering site options was land put forward in the 'call for sites' undertaken alongside the issues and options consultation and other sites identified by officers. 261 sites were considered as part of the Housing and Economic Land Availability Assessment (HELAA) which will be published alongside the consultation.

7.3 Following that process - which eliminated sites that already have planning permission, are too small, are not available, or are subject to "showstopper" constraints - the number of sites under consideration was reduced to 112 potentially suitable sites. Examples of showstopper constraints are significant areas of flood zone 3, sites that are covered by priority habitats, or (for residential) sites that are isolated and remote from existing settlements.

7.4 These 112 sites were visited by officers and subject to more detailed transport, landscape, ecology, heritage and infrastructure analysis drawing on advice from Warwickshire County Council and external advisers.

7.5 This process led to a shorter list of potential sites which were then used to identify options for growth scenarios. The reasonable alternative growth scenarios are detailed in the Sustainability Appraisal report which will be published alongside the preferred options plan.

7.6 A workshop was held with the administration to consider the potential site growth scenarios and select the preferred option. The options considered and the preferred option were reported to Planning Services Working Party on 29th January 2025. In February 2025 a further meeting was held with the opposition Leader and Shadow Portfolio Holder to go through the site selection process and the sites considered.

8 The new local plan and neighbourhood plans

8.1 The Planning Practice Guidance states: "policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a local plan covering the neighbourhood area that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence".

8.2 To deliver the required number of new homes under the new plan, it will be necessary to allocate land for housebuilding in villages. This will be true irrespective of whether the preferred more dispersed spatial strategy (as

detailed below) or an alternative strategy concentrated on a further very large site is pursued.

- 8.3 It would not be fair, nor defensible at local plan examination, to rule those parishes that have adopted a neighbourhood plan as 'out of bounds' for land allocations.
- 8.4 Furthermore, in view of the scale of new housing required, simply delegating the allocation of sites to neighbourhood plans is not considered to be a reasonable option. This would create significant delivery risks if those neighbourhood plans were not updated/produced rapidly.
- 8.5 Therefore, site options within villages with made neighbourhood plans have been considered. This will be disappointing to those who have put considerable effort into producing those plans. However, it needs to be recognised that this is a consequence of how local plans and neighbourhood plans interact across the country and is by no means unique to Rugby Borough.

9 Housing allocations

- 9.1 For housing, there were a relatively limited number of reasonable site options that could in combination deliver the necessary number of new homes. Advice received from Warwickshire County Council was that site allocations would need to be able to deliver a new secondary school to meet anticipated future needs. That school should be in the north of Rugby.
- 9.2 The preferred spatial strategy for housing set out in the draft plan seeks to meet the residual need for homes on a range of medium and smaller sites in a variety of locations across the borough. The Rugby urban area remains the principal focus for new housing with, including existing commitments, around 70% of new homes to be delivered at the Rugby urban area.
- 9.3 Draft land allocations are also proposed at the main rural settlements of Brinklow, Clifton-upon-Dunsmore, Long Lawford, Newton, Ryton-on-Dunsmore, Stretton-on-Dunsmore, Wolston and Wolvey. To avoid the need for children to be bussed between villages to attend primary school, the scale of new housing at villages has been limited to the projected future capacity at the village primary school, as advised by Warwickshire County Council. The potential to expand village primary schools was also considered. The largest rural allocations are proposed to be at Wolvey, Brinklow and Long Lawford because of the potential for the primary schools serving these villages to expand or accommodate additional spaces.
- 9.4 In summary, this more dispersed strategy to the allocation of further residential sites was selected for the following reasons:
 - (i) Avoiding an 'all eggs in one basket' approach. Over 60% of homes to be delivered to 2045 will be on the large sites of South West Rugby, Eden Park and Houlton. In view of the scale of these existing commitments, small and medium sites in a wider range of locations are proposed to provide opportunities to SME builders. Smaller sites that are easier to

develop will be able to come forward more quickly, providing supply in the shorter term while South West Rugby gets started.

- (ii) In view of the infrastructure strain on the town of Rugby, while the new allocations at Houlton, Eden Park and South West Rugby are being delivered, a strategy that would require a further large extension to Rugby was not favoured.
- (iii) The viability challenges at South West Rugby and before it Houlton call into question the ability of very large sites to deliver both infrastructure and affordable housing. A strategy focussed on small and medium sites is likely to deliver proportionately more affordable housing more quickly.
- (iv) The large sites put forward for consideration all had significant uncertainties over their traffic impacts, the scope of mitigation that would be needed and their ability to fund that infrastructure. A strategy that relies on a very large site to deliver the bulk of the residual housing requirement would have greater deliverability and soundness risks and could pose challenges in getting a plan in place within the Local Development Scheme timetable.
- (v) There are opportunities to utilise existing infrastructure in villages where school rolls are dwindling and to improve the range of facilities at villages, improving their sustainability.

9.5 The draft plan allocations include land that is designated in the current Local Plan 2011-2031 as Green Belt.

9.6 National policy advises that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.

9.7 It would be possible to deliver the necessary additional housing land outside of the Green Belt if land promoted at Lodge Farm between Dunchurch and Daventry, which could deliver 2,680 homes overall with an estimated 1,800-2,000 by 2045, were to be allocated. This option is not favoured because of the concerns identified above about deliverability, infrastructure and risk that arise from allocating another large strategic site to meet the bulk of the residual housing need. It is also not favoured because it would not deliver a secondary school in north Rugby. Furthermore, a pattern of concentrating housing on a further very large site, with no more housing allocated in the borough's main rural settlements except for the non-Green Belt villages of Clifton-upon-Dunsmore and Dunchurch does not represent a sustainable pattern of development.

9.8 Overall, in combination these factors constitute exceptional circumstances which justify alterations to Green Belt boundaries.

9.9 The sites that are not proposed for allocation and the reasons for not selecting them will be detailed in the evidence base published alongside the consultation plan, as mentioned above and listed below. It is not possible to detail all site options considered here, but the two principal large sites that could form the basis of alternatives to the proposed dispersed spatial strategy were the

aforementioned Lodge Farm site and a site lying between Cosford and Newbold on Avon alongside Swift Valley Industrial Estate (access from Main Street, Brownsover Road and Overview Way) which could accommodate circa 3,000 homes, with circa 1,800-2,000 deliverable by 2045.

10 Employment allocations

10.1 In contrast to the position on residential sites, a greater number of potential options for employment sites were put forward.

10.2 The draft plan incorporates employment land within two sites that are existing allocations:

- (i) Coton Park East, which was allocated for housing in Local Plan 2011-2031 but has not come forward. This site is more suited to development for employment floorspace because of its location close to the M6 and because it is accessed through the existing Central Park industrial area. The draft policy will require delivery of smaller units on part of this site, together with land to expand Rugby Free Primary School.
- (ii) Land that was identified as safeguarded for future development needs within the South West Rugby Local Plan 2011-2031 allocation. This land coming forward for employment development can fund delivery of the northern section of the Potsford Dam link road in the short term. This means that this item of infrastructure would no longer need to be funded by the wider residential site, helping site-wide viability issues. The site would deliver significant public open space as a buffer to Cawston Spinney woodland.

10.3 Alongside these sites, three further allocations are proposed all on land that is currently within the Green Belt:

- (i) Crowner Fields Farm and Home Farm, Ansty. This land now has a resolution to grant planning permission for an employment-led headquarters campus development under reference R23/1027.
- (ii) Land north of Ansty Park as an extension to the existing Ansty Park development. This land would be for industrial and research and development uses only, and not for distribution/warehousing.
- (iii) Prologis Park West and Mountpark, Ryton-on-Dunsmore. This large site would lie between the former Peugeot factory site and Middlemarch Industrial Estate (in Warwick District). The site would deliver a 55ha country park alongside the River Avon, a new on-site training centre and land that would be ring-fenced for smaller units.

10.4 Site options were put forward which could deliver the requisite employment land without the need to release Green Belt land. In particular, land on the A5 north of Houlton, land accessed from the A5 opposite Magna Park and land around Thurlaston.

10.5 Nonetheless exceptional circumstances are considered to exist justifying Green Belt release for the following reasons:

- (i) As is identified above, the need for strategic employment land is regional in nature. The functional economic market area (FEMA) in which Rugby Borough lies is centred on Coventry, as detailed in the HEDNA 2022. Coventry is the largest population and economic centre in the FEMA and so provides the deepest labour pool. Coventry City Council itself, because of land constraints, is only able to allocate one strategic site for 25ha. Absent Green Belt constraints, a sustainable approach would allocate employment land close to Coventry as the main population and economic centre in the FEMA. By contrast, avoiding the Green Belt would necessitate only allocations which would be distant from Coventry and its labour force. This does not represent a sustainable approach.
- (ii) The existing site at Ansty Park and the cluster of sites at Prologis Park Ryton, Middlemarch Industrial Estate, Coventry Gateway and Coventry Airport comprise regionally important mixed R&D, industrial and distribution locations. Allocating for expansion here has clustering and agglomeration benefits which would support more higher-skilled jobs and expansion in high value-added industries. These conditions are not replicable in more distribution-focussed locations along the A5 north of Rugby.
- (iii) The site at Ryton could deliver a 55ha country park which is contiguous with the existing country park west of the Avon and would also link with Ryton Pools Country Park. No other site opportunity can deliver habitat creation on this scale. This supports the Corporate Strategy objective for a greener Rugby.

10.6 Changes to Green Belt boundaries are also proposed to remove the existing Ansty Park and Prologis Park, Ryton-on-Dunsmore from the Green Belt, for consistency.

11 Gypsy and Traveller pitches

11.1 The NPPF states that the accommodation needs of different groups, including travellers, must be assessed and provided for in local planning policies.

11.2 The Gypsy and Traveller Accommodation Assessment 2025 which will be published alongside the consultation identifies a need for 94 pitches (1 April 2024 to 31 March 2042). Draft new allocations for 46 pitches are identified in Policy S4 of the plan.

11.3 The draft new allocations comprise two longstanding sites which current have temporary planning permission (Top Park, Barnacle and Rosefields, Wolvey); two new sites that would be required as part of the delivery of employment land (Coton Park East and Prologis Park West/Mountpark); and two new/expanded private sites (Wilsher Ranch, Shilton and Bryants Bungalow, Brandon Lane).

12 Evidence base

12.1 Alongside the consultation the following evidence documents and topic papers will be published:

- WMSESS (this has already been published by other partner local authorities)
- WMSESS-HEDNA Alignment Paper (this has already been published by other partner local authorities)
- Water Cycle Study (this has already been published by other partner local authorities)
- Housing and Economic Land Availability Assessment (HELAA)
- Stage 2 site assessment and supporting ecology, landscape and heritage reports
- Interim Sustainability Appraisal
- Interim Habitat Regulations Assessment
- Landscape Character Assessment
- Open Space Assessment
- Renewable energy mapping methodology
- Level 2 Strategic Flood Risk Assessment
- Rural sustainability study
- Gypsy and Traveller Accommodation Assessment 2025
- Retail and Town Centre Uses Study
- Development needs topic paper
- Spatial strategy and site selection methodology summary
- The development of Rugby Borough 2011-2024 topic paper

12.2 The following evidence will not be available to publish alongside the consultation but will follow later:

- Strategic transport assessment (STA). Work on this has not been able to commence while Warwickshire County Council have been updating the Rugby area traffic model. It is anticipated that work will commence on the STA in March 2025. The findings of the STA could necessitate changes to the draft plan.

- Green belt study update. A green belt study update is being progressed. However, new government guidance on the preparation of such studies, which is scheduled to be published in February, is needed before the work can be completed. The new study will need to identify the grey belt, which is a designation introduced through the December 2024 update to the National Planning Policy Framework.
- Level 2 Water cycle study. This will consider fresh and wastewater infrastructure to support the proposed new allocations, including impacts on river water quality.
- Interim viability assessment. This will provide advice on the viability of the proposed development management policies.
- Infrastructure delivery plan. This will detail the infrastructure upgrades needed to support the draft plan, estimated costs and proposed funding and delivery mechanisms.
- Net zero policy evidence. The technical evidence to support the draft new zero buildings policy (Policy CL1) is currently being prepared.

13 Consultation process and next steps

- 13.1 The consultation will be undertaken under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The regulations are not prescriptive over what format the consultation should take.
- 13.2 The consultation will run for eight weeks rather than the minimum six specified in the regulations because it straddles the school Easter holidays.
- 13.3 Hard copies of the consultation documents will be made available at the town hall and in libraries. Copies of the documents will also be available on the Council's website. The council's social media channels will be used to publicise the consultation along with posters and notices in newspapers.
- 13.4 The website page for the consultation will include a Q and A section on the consultation. There will also be a short video, focussing on the plan's spatial strategy, in similar format to that prepared for the issues and options stage.
- 13.5 Notification of the consultation will be sent to all those on the Council's planning policy consultation database.
- 13.6 An in-person briefing will be held for all Rugby Borough Council councillors and separately for all parish councillors within the borough.
- 13.7 In person drop-in events will be held in locations across the borough, as with the issues and options consultation. The location for these events will be agreed by the Chief Officer – Growth and Investment in liaison with the portfolio holder.
- 13.8 The proposed consultation will not be the final public consultation before submission of the plan for allocation. The outcome of the consultation will be

reported back to cabinet and council. There will be opportunities to make changes to the draft plan prior to the pre-submission consultation which is timetabled to start in January 2026.

- 13.9 A draft communications plan for the consultation is attached as Appendix 6. This plan will be fleshed out further when the dates and locations of the consultation events are confirmed.

Name of Meeting: Cabinet
Date of Meeting: 4 March 2025
Subject Matter: Local Plan Preferred Option Consultation
Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY **YES** **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
	Local Development Scheme https://rugby.gov.uk/w/local-development-scheme

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A



RUGBY BOROUGH LOCAL PLAN

ISSUES AND OPTIONS:

CONSULTATION REPORT

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BACKGROUND

The Regulation 18 “issues and options” consultation ran from Monday 30 October 2023 to Friday 2 February 2024.

A notice was placed in the Rugby Observer on Friday 3rd November 2023. See [Appendix 1](#).

Notice of the consultation was sent by email and post to those on the council’s planning policy consultation database. This includes all neighbouring authorities, parish councils, borough councillors, duty to cooperate partners and statutory consultees.

The consultation was undertaken in line with the consultation strategy approved by the council’s cabinet at its meeting on 23 October 2023 and by council at its meeting on 25 October 2023. A copy of the consultation strategy is at [Appendix 2](#). The consultation strategy was prepared in accordance with the Statement of Community Involvement.

Online consultation events were held on:

- 8 November 2023 7-8pm
- 17 January 2024 7-8pm

A briefing for elected members was held on Thursday 23 November and a briefing for parish councils was held on 30 November 2023.

The following in person ‘drop in’ consultation events were held:

- Tuesday 14 November 2023 5-6pm Cawston Community Hall
- Tuesday 21 November 2023 4-6pm Dunchurch Village Hall
- Tuesday 28 November 2023 4-6pm Rugby Art Gallery & Museum
- Monday 4 December 2023 4-6pm Brandon & Wolston Village Hall
- Wednesday 6 December 2023 3.30-5.30pm Wolvey Village Hall
- Thursday 11 January 2024 11.30am-1.30pm Tesco, Leicester Road
- Thursday 18 January 2024 10am-12pm Asda, town centre
- Tuesday 23 January 11am-1pm Sainsbury, Dunchurch Road
- Tuesday 23 January 4-6pm Rugby Art Gallery & Museum

Throughout the consultation the consultation documents were available for inspection at the following locations:

- Rugby Borough Council’s offices, Town Hall, Evreux Way, Rugby, CV12 2RR,
- Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
- Dunchurch Community Library, The Green, Dunchurch, Rugby, CV22 6PA
- Wolston Library and Information Centre, Warwick Road, Wolston, Coventry, CV8 3GX.

The consultation documents were also made available of the council's website.

The consultation and consultation events were publicised using the council's social media channels. Social media reached 137,777 people. This is a mix of Facebook, Instagram and Messenger users and online ads.

A total of 274 formal written consultation responses were received. 9 respondents submitted more than one response, for example by both submitting an email and an online questionnaire response. Additionally, 61 consultation responses were submitted anonymously via the online questionnaire, without a name or address being supplied. In line with the Statement of Community Involvement, anonymous responses have been rejected.

112 responses were submitted via email, the remainder used the online questionnaire.

172 Responses were from private individuals, 60 were from landowners or developers promoting sites, 12 were from parish councils, 9 were from statutory consultees, 6 were from neighbouring local authorities and 15 were from other organisations.

A YouTube video explaining the consultation was watched 653 times.

A summary of the comments received, by question, is set out below.

LAND FOR EMPLOYMENT USES

1. How much employment land should we be planning for?

162 responses were received to this question.

Summary of comments:

- 30 responses questioned the need for additional employment land given high employment rates and existing supply, or (for example, the response of Warwickshire Wildlife Trust) sought as low as possible an allocation.
- Some responses, including those from Coventry City Council, North Warwickshire Borough Council and Harborough District Council and six comments from landowners/developers, endorsed the Coventry and Warwickshire HEDNA. Monks Kirby PC argued that Rugby Borough should take only its fair share of regional need and the focus should be on brownfield and non-Green Belt land.
- 10 responses from residents sought higher levels of employment land provision, with (amongst others) numbers of 250ha, 500ha and 600ha suggested.
- 15 responses encouraged the re-use of existing sites/buildings and raised concerns about loss of countryside.
- 10 responses suggested 150.5ha (the Rugby Borough industrial land requirement 2021-2041 identified in the Coventry & Warwickshire HEDNA) should be the amount planned for (i.e. no contribution to meeting sub-regional logistics need).
- 11 comments from developers identified the likelihood of unmet general industrial need from Coventry based on HEDNA numbers and stated that Rugby Borough should contribute to meeting this.
- Eight responses (including Stretton on Dunsmore PC) endorsed planning for the 2041 (not 2050) requirement. One response questioned planning for need beyond 2041 given likely societal and consumption changes and the growth of robotics and AI. Four responses, including three from developers, advocated planning to 2050.
- Six responses from developers argued that HEDNA numbers should be treated as a minimum.
- Five detailed reports critiquing the HEDNA and providing commentary on alternative projections for future employment land need were put forward by developers.

- Five comments from developers suggested that the HEDNA underestimates employment land need, of these: two stated strategic warehousing need was underestimated; another stated the HEDNA should have included large scale strategic B2; others argued market signals, reshoring/near-shoring and the growth of online retail suggested higher need.
- Four developers put forward comments on how the Coventry and Warwickshire strategic warehousing need should be split between the local authorities. One suggestion was that based on past completions 37% of the need should go to Rugby Borough. Others said a “substantial quantum” or “significant proportion” of the need should be met in Rugby Borough.
- Pailton PC questioned whether home working could reduce future land requirements.
- Two comments stated that the current supply of employment land should be disaggregated between ‘local’ general industrial supply and strategic warehousing supply. Comments noted that much of the existing supply at Ryton, South West Rugby, Coton Park and Prospero Ansty was for strategic warehousing.
- Stretton on Dunsmore Parish Council stated that planning based on a continuation of past trends for road-based logistics is not justified, would increase emissions, conflict with SA objectives and undermine Local Transport Plan 4. A resident highlighted that the trend-based approach to employment growth was predicated on continued inward migration to the borough and this was driving the expansion of HMOs.
- One response highlighted the Employment Land Report prepared by the Coventry and Warwickshire Chamber of Commerce (June 2023) as supporting 20% more employment land than recommended in the HEDNA due to alleged past undersupply.
- One comment highlighted the need for the West Midlands Strategic Employment Site Study to be published before the need for employment land can be quantified.
- One comment highlighted that the largest increases in employment to 2041 are projected to be in hospitality and public services but the HEDNA doesn’t address the land requirements of these sectors.
- One response argued for the importance of planning with West Northamptonshire and Harborough District Council in recognition of the impact of DIRFT and Magna Park.
- One response argued for jobs-to-homes balance to avoid Rugby becoming a commuter town.

2. What type of employment land should we be planning for?

162 responses were received to this question.

Summary of comments:

- 34 responses mentioned a need for industrial/manufacturing land, including strategic scale manufacturing.
- 36 responses (inc. Pailton PC, Thurlaston PC and Stretton on Dunsmore PC) expressed opposition to more warehouses, particularly large warehouses. Respondents expressed concerns about low skill and salaried jobs, low employment densities, traffic, high land-take use of greenfield land, high levels of existing warehousing including Magna Park and DIRFT, and lack of a diversified economy. Stretton on Dunsmore PC expressed concerns about the impact of warehouses on sustainability appraisal objectives for greenhouse gas emissions, air pollution, diversifying the economy and green recovery.
- 28 responses, including 16 employment land developers and landowners, mentioned the need for warehouses or strategic warehouses.
- 17 responses mentioned a need for offices, including shared office spaces.
- 18 responses sought space for small businesses/smaller units, with one report referencing the 2019 market signals study.
- Many of the responses, including eight developers sought a mix of employment land/diversified economy.
- 10 responses mentioned a need for small or medium “mid-box” warehouses.
- Other uses suggested: tech, services and public sector, solar and wind power (and other green industries), creative industries, small scale food production, vehicle fleet maintenance, research and development, bioscience, live-work units, engineering including expansion of existing employers like Alstom, Colas, Mercia, Arturn, Lench.
- A supermarket chain argued that there is low demand for office space and so only low levels of office space should be planned for.
- One respondent mentioned the need for employment sites in rural areas.
- One respondent argued for allocations for hotels, food and beverage uses, medical and health uses, and schools given these are the sectors with the highest projected employment growth.
- One respondent mentioned the need for HGV parking and storage.

3. Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed).

175 responses were received to this question.

Summary of comments:

- A high number of responses raised concerns about transport impacts on the road network, in particular at M6 Junctions 1 and 2, the A5, A426 and A4071 and on the northern side of Rugby. Others expressed concerns about HGVs on country roads.
- Some responses noted that highways upgrades would be needed on the A5.
- Some responses expressed concern about building industrial land and residential too close to each other. Some raised this concern in relation to South West Rugby.
- Concerns about traffic noise and air quality at Ryton on Dunsmore were raised.
- Several responses endorsed locations on major roads with the easiest connections to the motorway network.
- Several responses commented on the need for workplaces to be accessible by public transport and bicycle.
- Several responses expressed opposition to development in Green Belt locations. One developer noted the test for Green Belt locations is a “high bar”. A landowner said non-Green Belt locations should be considered first.
- One response pointed out that agricultural land to the south of Rugby is higher quality to that to the north of the town.
- A couple of the responses expressed preference for locations close to Rugby, to greater benefit local residents.
- National Gas requested that the council is mindful of the gas transmission network when selecting sites, while the EA noted the need to consider flood risk
- One developer response suggested the desirability of expanding existing sites.
- 21 responses from landowners/developers promoted the merits of their site.
- Two responses noted concerns expressed by the inspector in the last plan examination about the impact of development at A45 Walsgrave Junction on Coombe Park Grade 2* list and Coombe Pools SSSI.

- One response suggested locations South of Hinckley would meet Leicestershire’s employment need.
- One response argued that locations on the edge of Coventry would meet Coventry’s employment needs and not those of Rugby Borough.
- The Canal & River Trust asked that any development in the vicinity of the canal of feeder channel at M6 Junction 1 or south of Hinckley should protect them from any risk of damage or adverse impacts on water quality.
- A number of comments opposed or raised concerns about specific locations, including comments from Kilsby Parish Council (A5 north of Houlton), Pailton PC (Magna Park), Stretton on Dunsmore PC (A45 corridor), Thurlaston PC (South West Rugby safeguarded land). Thurlaston PC subsequently submitted a petition in relation to sites promoted between the B4429 and M45.
- Moto sought the safeguarding of the area north of the Rugby motorway service area for future expansion.
- National Highways provided preliminary comments on M6 Junctions 1 and 2, A46 Walsgrave Junction, Ryton, A45/A4071, A5 North of Houlton and South of Hinckley.
- Natural England highlighted sites within impact risk zones for Sites of Special Scientific Interest: Ansty Business Park expansion/A45 Walsgrave Junction, within the IRZ for Combe Pool SSSI; Prologis Park Ryton expansion, within the IRZ for Brandon Marsh and Ryton Wood SSSIs; Safeguarded land within the South West Rugby allocation, and A45/A4071 junction, are within the IRZ for Draycote Meadows SSSI; Other issues which may affect these designated sites are water supply, water quality and air quality.
- North Warwickshire Borough Council highlighted the importance of considering highways impact beyond the site.
- One response suggested that the R23/1027 application (Frasers Group, Ansty) is determined first, and if this is permitted no further land would be required. 18 responses were submitted which raised specific concerns/objections to that planning application.
- Severn Trent Water requested early insight into proposed site allocations to ensure capital investment is planned to accommodate future development.

The following locations were specifically proposed by one or more respondent:

M6 junction 2 (north of junction)
Ansty Business Park expansion

A46 Walsgrave Junction
Prologis Park Ryton expansion/A45 Ryton
Safeguarded land within the South West Rugby allocation
A45/A4071 junction/Blue Boar
A5 north of Houlton
A5 generally
M6 Junction 1
South of Hinckley
Rugby East
land south of Coventry Road
Land adjoining Ansty Park – Ansty North
Land adjoining Ansty Park – Ansty East
Land at Coton Park East
North of the M6 and south of the A426
Land to the south side of the M6
Land opposite Magna Park
Land at Ansty
Land at Tythe Platts Farm
Land north of J1, M6
Land to the south of Junction 1 of the M69
Rugby town centre (including for independents)
Europapark expansion
Land south of Dunchuch

Rugby Borough Council response:

Sites promoted by developers, including those listed above which were mentioned in representations and others submitted through the call for sites process, are being reviewed as part of the Housing and Economic Land Availability Assessment and site selection process.

The constraints and information raised by the Environment Agency, Canal & River Trust, National Gas, Natural England, Severn Trent Water will be taken into account in the site selection process.

4. How can we provide more space to allow existing businesses to expand?

134 responses were received to this question.

The following suggestions were made:

- Incubator sites/units (near Coventry Airport suggested).
- Use of or repurposing empty property, some suggesting Rugby town centre vacant shops or offices.
- Regenerate existing industrial sites, Somers Road, Paynes Lane and Hunters Lane suggested.
- Provide space within large employment sites (potentially as a “planning gain” requirement suggested by Newton & Biggin PC and North Warks BC and one developer).
- Expansion of existing sites.
- Rates reduction.
- Use of CPO powers to assemble a brownfield sites.
- Create a technology park or innovation centre.
- Reduce the amount of land given over to warehousing.
- Build small/medium unit estates, sub 1000sqm units (Newton and Biggin PC suggest one option could be for RBC to deliver units itself).
- Provide more self-build options.
- Allowing more small countryside developments.
- Increase space vertically.
- Relocate Rugby tip and reuse that space.
- Small start-up space should be close to housing.
- Allocating more employment land including smaller sites (10 developers).
- Retain Local Plan policy ED1 which supports expansion of existing businesses within existing employment sites.
- Allocate specifically for smaller-scale light industrial (Class E(g)(iii)) and industrial (Class B2) uses and smaller B8 uses.

- Allocate for big box units as they are the most viable and so will drive delivery (landowner).
- No need to allocate as HEDNA anticipates that 67% of current warehouses will be obsolescent as warehouses by 2043 and manufacturing employment will contract (resident).
- Allow existing businesses to expand in the Green Belt (landowner).

5. We are minded to allocate sites specifically for industrial (B2) and light industrial (E(g)(iii)) uses. Do you support this and if so, where?

155 responses were received to this question.

92 responses supported the proposal (including 8 landowners/developers).

56 responses did not support the proposal (including 6 from landowners/developers).

7 other comments or neutral responses were received.

Summary of comments:

- Objection on the basis that it would limit flexibility in the market.
- Argument that the evidence base isn't there to support sites solely for one sector (2 responses from developers).
- Support but flexibility should be included in the wording of any policy (2 developers).
- Suggestion that the council should allocate for local B8 use too.
- Given the large volume of warehouses becoming redundant over the plan period, there should be a policy of encouraging conversion from B8 to B2.
- Only restrict use to B2 where this is needed for environmental impact reasons.

The following locations were proposed:

M6 Junctions 1 and 2

A45

A4071

A5 near DIRFT

On the borders of Coventry where there is more existing industry

Ryton

North of Houlton

Houlton

Brownfield/regenerating existing sites such as Paynes Lane, Mill Road Industrial Estates, Hunters Lane

Walsgrave

Land to the south side of M6

Clustered around existing concentrations

6. Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?

176 responses were received to this question.

40 respondents said there were exceptional circumstances.

127 respondents said there were not exceptional circumstances.

Nine respondents commented without expressing a view as to whether there were exceptional circumstances.

Summary of comments:

- Adequate employment land available outside Green Belt.
- Green Belt release might be required to meet Coventry's unmet need on sites close to the city, this could be exceptional circumstances.
- Not undertaking a Green Belt review would have negative effects on the economy.
- Green Belt review needed to ensure sustainable patterns of employment development and to allocate sites where access is good.
- Lack of reasonable alternatives outside Green Belt to meet HEDNA need.
- Allocating in Green Belt should only be done once non-Green Belt options exhausted.
- An up to date Green Belt review should be carried out, consistent with Green Belt reviews of other councils.
- The HEDNA says Green Belt development will be needed for B8.
- The high employment rate, low unemployment means that a Green Belt review is not necessary.

TOWN CENTRE REGENERATION

7. Do you agree with our proposals to remove the primary shopping area and primary and secondary frontage designations in Rugby town centre?

138 responses were received to this question.

71 responses agreed.

77 responses disagreed.

Summary of comments:

- NPPF para 90 still requires planning policies to define primary shopping areas.
- Traditional centres are too big for the market they serve given online and changes to retail. Need flexibility to evolve Support for flexibility and repurposing units.
- Specific references to Rugby Central, High Street and Sheep Street.
- Concern expressed about impact on older and disabled residents.
- Suggestion that the town centre should be a more compact area.
- Suggestion that medical and education uses should be encouraged.
- Some responses suggested a retail core still needed.

8. Which town centre sites should have site allocation policies and what should they say?

97 responses were received to this question.

Summary of comments:

- A lot of support for redevelopment.
- Several comments suggested the need to retain parking, including station parking with some suggesting free parking.
- Other comments supported improved bus facilities and promotion of active travel, or commented on the centre being overly car-dominated and suggested increased pedestrianisation.
- Comment on the need to change Rugby town centre from a shopping centre to an entertainment centre. However, some other comments sought more retail.
- Objection from Aldi to including the Cemex House site within any potential Rugby Central allocation, unless there is clear recognition of the acceptability of retail use on the site and sufficient flexibility is provided in terms of how it is brought forward.
- Consider the potential for land contamination (Environment Agency).

Specific sites suggested in multiple responses:

- Rugby Town Hall, The Benn Hall and Newbold Rd Car Park (although there were comments expressing support for retaining the Town Hall and Benn Hall buildings and another suggesting more community use of the Town hall)
- Rugby Central
- Webb Ellis Industrial Estate
- Royal Mail and Mill Road Car Park, Stagecoach (suggestion Mill Road Car Park should be developed for housing similar to Chaolais Gardens)
- John Barford Car Park, Old Market Place and Railway Terrace car park, support for this being returned to a market
- Rugby Borough Council depot on Albert Street

Other suggested sites/interventions:

- North Street Car Park (residential)
- Morgan Sindall
- Protection of the independent quarter
- Make North Street one-way and remove the taxi rank
- Office or business reuse of vacant shops (Fargo Village suggested as a precedent)
- More green spaces and quality of open spaces

- Improve walking route from station to town centre
- Alexandra Arms (protect as a pub)
- Destination for events
- Promote heritage, recreation, venues

9. Should we introduce a policy that sets out the improvements to streets and spaces we want to see in the town centre?

136 responses were received to this question.
117 responses supported introduction of a policy.
16 responses did not support introduction of a policy.
3 neutral comments were received.

Summary of comments:

- Policy should ensure delivery of Rugby Regeneration Strategy.
- A lot of support for the policy to cover all of the town centre.
- Support for an indoor market.
- Suggestion that s106 contributions should be used for public realm improvements.
- Support for tree planting.
- Specific areas identified in responses as needing to be covered by the policy:
 - Newbold Road, Corporation Street
 - Clifton Road
 - Rugby Central
 - Old Market
 - Station Gateway
 - Rounds Gardens
 - High Street and Sheep Street
 - Station Place, Albert Street and Murray Road
 - North Street and Evreux Way (suggestions for pedestrianisation/bus only)
 - The Library
 - Market Place
- Policy shouldn't be overly prescriptive (supermarket developer).
- Biodiversity enhancements should also be considered in the town centre. This can include removing areas of hard standing to create more green/blue spaces and retrofitting SuDS on existing buildings (Environment Agency).
- Recognise and protect assets of community value (Pailton PC).
- Policy should make provision for transport, active travel, GI and BNG.

10. Should we define local centres? If yes, which centres should we include?

121 responses were received to this question.
 82 responses supported the proposal to define local centres.
 39 responses did not support the proposal.

Many responses expressed support for designating all of the potential local centres listed in the consultation document. One response said this would help support main town centre uses there and the monitoring of changes. One response suggested leaving the designation of local centres to neighbourhood plans.

One developer response suggested that district and local centres should be identified within any new strategic housing and employment allocations. This will ensure that growth comes forward alongside appropriate community infrastructure.

The master developer of Houlton argued Dollman Darm local Centre and Houlton District Centre shouldn't be defined as centres because the conditions of the Houlton planning permission are adequate to control them and the district centre won't be complete when the new plan is adopted.

Pailton PC questioned whether local centres might be more attractive to residents than the town centre and this could weaken town centre regeneration.

The following specific locations were mentioned:

Name of proposed centre	Number of responses that proposed the centre
Bilton	15
Hillmorton (High Street)	14
Dunchurch	10
Brownsover	9
Houlton	8
Paddox	7
Cawston	5
Clifton upon Dunsmore	6
Coton Park	4
Lower Hillmorton Road	3
Clifton Road	3
Newbold	3
Newton	3
Kingsway	2
Woodlands	2
Eden Park	1
Brinklow	1
Hillside	1
New Bilton	1
Hillside	1
Wolston	1

Shakespeare Gardens/Overlade Lane	1
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11. Are there other things the local plan should do to support town centre regeneration?

127 responses were received to this question.

112 responses felt there were.

15 responses felt there were not.

Summary of comments:

- Free parking (generally, or after 6pm, weekends and on market days suggested)
- More parking, including in local centres at Bilton and Dunchurch
- Reduce traffic flows through the centre, more pedestrianisation
- Active travel and cycle routes
- Electric car charging/improve access by car
- Encourage independent businesses
- More residential uses
- More workspaces
- More green space, park connector project, street trees, floral displays
- School streets scheme
- Diversify offer
- Improve bus services
- Local gardens and shared community spaces
- Reduce business rates
- Bring back an indoor market and improve outdoor market
- Small music and arts/craft venues
- More events, festivals
- Stop further out of town retail (a number of comments identified how Elliotts Field has harmed the town centre)
- Improved the link between the town centre and the railway station
- Education, economic and social projects
- Focus retail/entertainment in one location, contract centre
- More space for the museum, art collection
- New incubator unit
- Social street furniture
- New supermarket in south of town
- Reuse of older buildings
- Compulsory purchase vacant sites
- New café needed at Eden Park
- Give consideration to site feasibility and viability to ensure that developments are deliverable.
- Avoid policies are not unduly restrictive and limit town centre investment and development (supermarket developer).
- Consider impact on the historic environment and seek archaeological advice, in line with NPPF guidelines (Historic England).
- Environmental improvements, tree planting

PITCHES FOR GYPSIES AND TRAVELLERS

12. The council proposes to plan for Gypsy and Traveller pitches based on the ethnic need target of 79 pitches 2022-2037 identified in the GTAA 2022. Do you agree?

130 responses were received to this question.

59 respondents agreed with the proposal. 69 respondents did not agree with the proposal.

Two general comments were received.

Summary of comments:

- Not easy to meet even lower pitch target, plan should be realistic.
- Existing sites not fully occupied.
- State need figure (whichever is used) should be a minimum, not target.

Rugby Borough Council response:

In December 2023 the government amended the definition of Gypsy and Traveller in Planning Policy for Traveller Sites. The new definition is

“For the purposes of this planning policy “gypsies and travellers” means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

2. In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances”

This amends the previous definition which excluded those who had permanently ceased travelling.

The new definition is not the same as the ethnic need used in the GTAA 2022, therefore Rugby Borough Council have commissioned a new Gypsy and Traveller accommodation needs assessment using the new government policy. This research is currently underway.

13. How can we find sites to accommodate the need for Gypsy and Traveller pitches?

- (a) Allocate sites for Gypsy and Traveller pitches as part of new employment land or housing developments?**
- (b) Regularise existing unauthorised sites?**
- (c) Create a new borough or county council-owned site?**
- (d) Other (please explain).**

135 responses were received to this question.

32 respondents supported allocation of pitches as part of new employment land or housing developments, two stating employment sites only.

64 respondents supported the regularisation of existing unauthorised sites.

57 respondents supported the creation of a new borough or county council-owned sites.

Summary of other comments:

Other options suggested were:

- Proactively identify and allocate new private sites, rather than being reactive (Shilton & Barnacle PC).
- On sites with derelict buildings.
- Sharing the sites between the rural and urban areas.
- Not regularising sites subject of outstanding enforcement action where it has been determined that they are inappropriate on planning grounds.
- Speak to the communities and find out where they want to be.
- Expanding existing sites.

Other comments:

- One landowner expressed concern about the viability impacts of an integrated Gypsy and Traveller site and the relationship between residents and the site.
- Environment Agency sought policy wording that “pitches should be located outside of the 1 in 100 year, plus an allowance for climate change, flood extent”.
- Stretton on Dunsmore PC opposed a general policy of regularising unauthorised sites as it would encourage more.
- Stratford-on-Avon District and Warwick District called for Rugby Borough to meet its own need before asking other authorities.

14. When allocating sites for pitches, what size of site should we be seeking to allocate?

91 responses were received to this question.

Summary of comments:

- One large (20 pitch) site and a number of small 2-5 pitch sites
- 10-20 pitches
- Max 1-2ha
- 2 acres
- 10-12 pitches maximum (8 responses, including North Warwickshire Borough Council)
- 5 or 6 pitches maximum (2 responses)
- 10/12 caravans (2 responses)
- Proportionate to size of existing settlement, services and facilities
- Smaller sites provide community balance/integrate better, put less pressure on local services
- Ask the community what they need (3 responses)
- There should be a maximum size of a site within a parish and restrictions on nearby sites (5 miles suggested)
- Small or large
- Prefer more small sites over fewer large sites (Shilton & Barnacle PC)
- Avoid aggregation of multiple sites in close proximity (Shilton & Barnacle PC)

15. Should we adopt a negotiated stopping policy which allows caravans to be sited at a suitable location for an agreed and limited period.

121 responses were received to this question.

63 (including Shilton and Barnacle PC and Pailton PC) supported a negotiated stopping policy.

58 did not support a negotiated stopping policy

Pailton PC said it would support such a policy, but only if supported by local community.

HOUSES IN MULTIPLE OCCUPATION

- 16. The council proposes to introduce a policy to limit concentrations of HMOs within a 100m radius to 10% of dwellings, avoid non-HMO dwellings being sandwiched between two HMOs and avoid three consecutive HMOs on a street. Do you agree with this policy?**

149 responses were received to this question.

120 supported the proposed policy.

29 did not support the proposed policy.

Summary of other comments:

- 30 responses suggested the policy should apply across borough to avoid displacement.
- 16 responses suggested limiting the policy to central Rugby or specific wards.
- 4 responses supported a stronger policy (for example 5% within 200m radius).
- Specific concerns expressed by multiple respondents about New Bilton and Benn Ward or Rugby town centre generally.
- Six responses suggested that there is a need to develop smaller, cheaper housing to remove the need for HMOs, Thurlaston PC suggested housing association/council housing needed.
- Four responses made a link between the development of warehousing and the proliferation of HMOs.

17. We also propose to introduce a criteria-based policy that sets clearer standards for parking, refuse storage, and the adequacy of external and internal space for HMOs. Do you support such a policy?

151 responses were received to this question.

140 supported the proposed policy.

11 did not support the proposed policies.

One neutral comment was received.

Summary of other comments:

- Several responses raised concerns about the adequacy of car parking, one mentioned bin facilities .
- One response noted that HMOs will need to play an important role because of the rising age of first-time buyers and that high quality HMOs are required.
- The Environment Agency commented as follows: “HMOs often have ground-floor sleeping accommodation. This puts those on the ground floor at the highest risk of flooding. Therefore, in areas within the 1 in 100 year plus climate change, we recommend HMOs should 1) When they are new build, have finished floor levels set a minimum of 600mm above the 1 in 100 year plus climate change level; or 2) When they are change of use, raise finished floor levels to 600mm above the 1 in 100 year plus climate change. If this is not possible, a water exclusion strategy and flood resistant construction should be put in place and there should be no ground floor sleeping.”.

CLIMATE CHANGE POLICIES

18. Should we show areas of the borough in which wind and/or solar energy will be supported? Is so, where?

157 responses were received to this question.

123 supported identifying areas where wind and/or solar energy will be supported.

24 did not support identifying areas where wind/solar will be supported.

10 other comments were received.

The following locations were suggested:

- 28 responses (including two major industrial land developers) suggested renewable energy on or near to industrial land, including solar panels on roofs.
- 26 responses said wind and solar should be allowed anywhere in the Borough that is suitable. 5 of those responses specifically said that this should include Green Belt land.
- 18 responses suggested solar panels on motorway/A-road central reservations or verges.
- Six responses expressed opposition to solar or wind energy on Green Belt land.
- Six responses suggested renewable energy generation in residential developments or on homes.
- Two responses argued the need to protect farmland, while two others stated support for solar only on farmland (not wind).
- Two responses suggested solar panels on the roofs of public buildings.
- One response from a landowner promoting a solar farm was received.
- Churchover PC expressed concern about the impact of solar farms.
- One respondent said there were very special circumstances for identifying sites for renewable energy in the Green Belt.
- Warwickshire Wildlife Trust said that solar farm locations should be selected to reduce biodiversity impact.
- Natural England stated that care should be taken to safeguard the best and most versatile agricultural land.

- One response stated that on-shore wind is the cheapest source of energy.
- Moto Hospitality Limited suggested that the neighbouring field north and west of Rugby motorway service area is suitable for ground mounted solar to support EV charging.

19. If some new wind development schemes could be community owned by RBC residents, would that increase your support for this type of development?

138 responses were received to this question.

85 responses said their support for wind energy schemes would be increased by community ownership.

53 responses indicated that it would not affect their support for this kind of development.

One response suggested creation of a community energy trust

20. We are minded to introduce a policy that supports other zero carbon energy infrastructure including battery energy storage and hydrogen energy infrastructure. Do you agree?

150 responses were received to this question.

112 responses (including Prologis and Segro and Thurlaston PC) supported the proposed policy.

37 did not support the proposed policy.

One response was unsure/neutral

Summary of comments:

- This should be close to existing grid infrastructure.
- 12 responses suggested support for this technology anywhere in the borough.
- 7 suggested locating on industrial land.
- 4 expressed doubt about the green credentials of either hydrogen or battery energy storage.
- One response opposed Green Belt locations.
- One response said that renewables should be favoured ahead of these technologies.
- Two responses suggested utilising vacant buildings in Rugby town.
- One developer said there is scope for energy storage within large scale industrial and logistics developments to contribute or meet their own operational needs.
- One developer said given the fast-moving pace of technological change in this sector it is important to maintain flexibility and not introduce mandatory requirements.

21. Should we adopt a minimum tree canopy policy for new development?

184 responses were received to this question.

157 responses (including two developers, Warwickshire Wildlife Trust, The Woodland Trust and the Environment Agency) supported a minimum tree canopy policy for new development.

18 responses including 10 landowners/developers did not support a minimum tree canopy policy for new development.

9 other responses were received.

Summary of comments:

- 63 responses felt this should apply everywhere and to all new developments.
- Six responses raised concerns about the loss of existing trees.
- Four responses suggested tree planting in existing areas.
- Four responses suggested a 15% requirement (one referencing this as the old National Forest requirement), another suggested 25%, the Woodland Trust suggested 30%
- Seven developers/landowners raised viability concerns with the policy.
- Four responses argued the policy was not needed because of biodiversity net gain or would potentially conflict with that policy.
- Four responses, including that of the Home Builders Federation, asked for additional evidence to justify the policy.
- Three stated the policy wouldn't be deliverable on some sites due to constraints.
- Three sought flexibility in the policy.
- Three suggested along roadsides while another suggested trees should not be planted near roads (a minimum of 5 metres away).
- One response suggested allergenic trees like Birch shouldn't be planted. One response suggested native trees. One suggested heritage fruit trees. Natural England, The Woodland Trust and the Environment Agency argued that the maximum proportion of new trees should be native, UK and Ireland sourced and grown as won't introduce pests.

- Natural England stated “tree planting may not be appropriate for all sites, and may not in itself increase biodiversity, carbon sequestration or urban cooling, and trees can take many years to reach maturity. A variety of habitats should be considered... Where tree planting or other habitat creation is undertaken the specimens chosen must be a range of local native species, and a management plan implemented to insure their establishment.”.
- One landowner suggested that a minimum tree canopy policy would be easier to apply and to understand the viability impacts of, than would setting biodiversity net gain at greater than 10%
- One resident, supporting the proposal, stated that trees reduce surface temperatures through shade and evapotranspiration, enhance the look of environments, shelter wild life and are good for mental health.
- One response said the Tree Score Equity Map would show where trees are needed the most.
- One developer response stated it would be incompatible with large-scale B8 warehousing development where a very large footprint is needed.
- Newton and Biggin PC stated that Warwickshire County Council support would be needed, given its historic opposition to street trees.

Other options suggested:

- 2 responses suggested this should apply on large developments, with one suggesting 20+ houses.
- All residential developments over 10 units (2 responses).
- residential development only (2 responses).
- All residential over 5 units.

22. Should we identify priority locations or allocate sites for biodiversity net gain and, if so, where?

163 responses were received to this question.

127 (including 11 developers/landowners) responses supported the identification of priority locations or site allocations for biodiversity net gain.

25 responses did not support the identification of priority locations or site allocations for biodiversity net gain.

11 other responses were received.

Summary of other comments:

- Large habitat creation on identified sites is likely to maximise the biodiversity net gain that can be achieved.
- Having reasonable options for off-site improvements will assist developers who can't meet requirement on-site.
- Hold a call for sites specifically to request land to be considered for BNG (three respondents).
- Prioritise connectivity between green/blue spaces (Environment Agency).
- Seek 20% Biodiversity New Gain (Woodland Trust, Warwickshire Wildlife Trust) with The Woodland Trust suggesting a 50 year maintenance period.
- BNG sites should either be located on land managed exclusively for nature conservation purposes or at existing/new country park sites that, despite being publicly accessible, are managed appropriately to maximise BNG.
- Site allocations that can provide more than 10% BNG should be prioritised.
- Identify sites of limited ecological interest to maximise gain (developer).
- Off-site contributions should go to "demonstration sites" close to Rugby so residents can enjoy nature nearby or to improving connectivity around key habitats which emerge from the nature recovery strategy.

Locations suggested included:

- On site/as close as possible to site (6 responses)
- Within borough (6 responses)

- Expand existing sites (6 responses)
- Anywhere (3 responses)
- Swift Valley (2 responses)
- Alongside waterways
- South of Hillmorton (2 responses)
- South of Rugby (2 responses)
- Old disused gold course next to Brandon Marsh wildlife centre
- Rounds Gardens
- Ansty
- On low quality farmland
- On urban/rural periphery
- North of Houlton
- Alongside disused railway lines
- Area south of St Cross Hospital

23. Would you support the creation of an additional country park as part of delivering biodiversity net gain?

164 responses were received to this question.

145 responses (including Natural England, Environment Agency) supported the creation of an additional country park as part of delivering biodiversity net gain.

15 responses (including Warwickshire Wildlife Trust) did not support the creation of an additional country park as part of delivering biodiversity net gain.

4 other responses were received.

Summary of other comments:

- Opportunity to create a community park at Prologis Park Ryton West (developer), similar community park proposal at land at Walsgrave (also developer).
- Country parks should be run and managed by borough council to retain direct control over delivery of BNG, this would be simpler than having to rely on offsetting providers in the private market also has wider benefits for residents in access to countryside and recreation opportunities (two developers).
- Residents should be able to walk/cycle to sites.
- Country parks would need to be high quality habitat (not amenity grassland or open water) and should prioritise habitat connectivity (Environment Agency).
- Concern about policies that go further and faster than national guidance could undermine emerging BNG local markets (Home Builders Federation).
- County parks are often noisy, busy, sites which allow access to dogs, and noisy play areas. Areas for biodiversity net gain, should be for that purpose and as such managed to conserve and enhance wildlife and important habitats (Warwickshire Wildlife Trust).
- This shouldn't just include large country parks but also community orchards and woodlands (Stretton on Dunsmore PC and resident).

Locations suggested included:

- Cawston woods/within South West Rugby site (10 responses)
- Houlton/between Houlton and Crick (6 responses)
- Quarries (Astons farm/Cemex (5 responses)

- Rainsbrook Valley (6 responses)
- North of Rugby/Coton Park (5 responses)
- Hillmorton/south of Hillmorton (4 responses)
- South Rugby/Dunchurch (4 responses)
- Clifton upon Dunsmore/between Houlton and Clifton upon Dunsmore (4 responses)
- Swift Valley/Elliott's Field (2 responses)
- Avon river floodplain (2 responses)
- Ansty (2 responses)
- Monks Kirby
- Brook Valley Nature Reserve, Queen's Diamond Jubilee Woodland
- Near Draycote reservoir
- Wolfhamcote or Grandborough parish
- Land behind Rounds Gardens
- Along old Great Central railway line
- West of Rugby near Cemex

24. Should we require developers to prioritise the delivery of biodiversity gain within close proximity to the development?

171 responses were received to this question.

142 responses supported a requirement to prioritise the delivery of biodiversity gain within close proximity to the development.

24 responses did not support a requirement to prioritise the delivery of biodiversity gain within close proximity to the development.

Five other/neutral response was received.

Summary of other comments:

- Support where mitigation cannot be met on site (developer, Environment Agency).
- There could be a potential for conflict with policies which seek to centralise or consolidate areas for the provision of BNG and in such circumstances the benefits of consolidation should prevail (developer).
- Policy not necessary in light of national legislation/would conflict with that legislation (three developers, two land promoters, one landowner).
- Concern that it could prevent sites being developed if there is no nearby suitable BNG site (two developers, landowner).
- The plan should reference on site delivery, off site delivery and statutory credits (Home Builders Federation).
- There should be flexibility in the requirement depending on the type of habitat which is required.
- Close proximity is difficult to define and creates the potential for ransom strips for nearby landowners (developer).
- Could lead to piecemeal/smaller net gain (landowner).

25. We are considering requiring all residential developments to be net zero. Do you agree?

175 responses were received to this question.

130 responses supported a requirement for all residential developments to be net zero.

40 responses did not support a requirement for all residential developments to be net zero.

Five neutral/other comments were received.

Summary of comments:

- Viability evidence is needed (landowner, developer).
- Concern about impact on viability (three developers, West Midlands Housing Association Planning Consortium).
- Policy would be onerous (developer).
- Policy should be flexible to support viability and delivery (Homes England).
- Building Regulations are the most appropriate way of controlling building energy performance, changes to Building Regs coming (five developers, landowner, Home Builders Federation, Homes England, West Midlands Housing Association Planning Consortium, North Warwickshire Borough Council).
- Concern that bespoke local policy would undermine economies of scale (developer).
- Explore opportunities for waste management and resource efficiency (Environment Agency).
- Need to consider the role of the current building stock in diminishing carbon emissions (Historic England).
- Cornwall is a unique case because of government investment (developer).
- Should only be mandatory for EIA development, but encouraged for smaller development.
- There should be a transition period (Pailton PC).

- An alternative could be a presumption in favour of zero carbon development (care home developer).

26. We are considering requiring all non-residential development to be net zero. Do you agree?

176 responses were received to this question.

137 responses supported a requirement for all non-residential developments to be net zero.

31 responses did not support a requirement for all non-residential developments to be net zero.

Eight other/neutral comments were received.

Summary of comments:

- Policy needs to be justified by viability evidence (two developers).
- Viability concerns raised (landowner).
- Operational stage new zero carbon is often out of the control of the developer to manage as it depends on occupier requirements (developer).
- New zero is a realistic prospect for the large scale industrial and logistics sector (developer).
- Onerous policies would undermine delivery (developer). Developer support would be important (Newton & Biggin PC).
- It would help if neighbouring authorities adopt the same standards.
- In accordance with the recent Written Ministerial Statement the council should not set energy efficiency standards that go beyond the current or proposed building regulations (land promoter).
- Policy should be flexible/encourage rather than require (land promoter, developer).
- Some types of commercial or industrial development won't be able to achieve net zero because of operational requirements (land promoter).
- Supported where feasibility and viability allow (supermarket chain).
- Topic is being addressed through Building Regulations (land promoter, developer, two landowners, North Warwickshire Borough Council).
- Difficult to agree a definition of new zero (landowner).
- Policy should consider the existing building stock (Historic England).

- Further information needed on proposed standard (landowner).
- Policy should only be mandatory for EIA development, but encouraged for smaller development (resident).
- Suggest alternative as “presumption in favour of zero carbon development” (care home developer).
- NHS property could benefit from offset funds.

27. Are there other climate change policies we should be introducing?

98 responses were received to this question.

Summary of comments:

Eleven responses (included Thurlaston PC and Natural England) highlighted sustainable drainage and a reduction of hard impermeable surfaces. Two of the responses raised concerns about large hard surfaced areas at warehouses.

Nine responses suggested construction of more cycle lanes and/or improved facilities for walking.

Seven responses highlighted the importance of new green spaces and/or trees, and four including Warwickshire Wildlife Trust mentioned green roofs.

Five responses expressed support for avoiding building on flood plains.

Five responses suggested reducing new building/housebuilding/warehouse building.

Five responses (including Thurlaston PC) mentioned improving public transport.

Five responses (including Thurlaston PC) mentioned building insulation with one mentioning insulating existing homes.

Five (including the Environment Agency) suggested rainwater harvesting.

One response argued climate policies destroy jobs and businesses, questioned the scientific basis for human-caused global warming, and stated that Britain is only responsible for a small proportion of global emissions. Three expressed concern about the cost of complying with policies.

Two responses suggested renewable energy generation (not tied to other developments), with three others suggesting that the council invest in renewable energy generation including solar panels on council buildings.

Three responses highlighted air quality issues due to traffic, with one tying that to HGVs.

Others mentioned in one or two responses:

- Avoid policies that go further or faster than national policy as this leads to a patchwork of local standards (Home Builders Federation);
- Introducing a policy in support of renewable energy development in the Green Belt (landowner);
- controlling Green Belt development;

- EV charging, including in car parks;
- limiting parking provision, introducing residential parking permit requirements for wider areas;
- restricting national permitted development rights which allow hard surfacing of front gardens;
- retrofitting RBC buildings to be net zero;
- lifetime impacts of developments;
- white/reflective roof surfaces to reflect sunlight back into space;
- district heating;
- Allocate for community orchards and woodlands (resident and Stretton on Dunsmore PC) or community allotments (Warwickshire Wildlife Trust);
- Extra care housing can be sustainable when located in rural areas outside villages (care home developer);
- Demanding criteria for new helipads.

Other proposals, which fall outside of the scope of planning policies included:

- need for National Grid to support more generation of electricity from residential and commercial developments;
- carbon capture;
- improved recycling;
- communal green travel;
- infrastructure for hydrogen cars;
- intelligent street lighting;
- improving or enlarging Draycote Water;
- repairing potholes;
- banning natural gas.

28. Should we require non-residential development to meet higher water efficiency standards to reduce water usage?

165 responses were received to this question.

139 responses supported a requirement for non-residential developments to meet higher water efficiency standards to reduce water usage.

19 responses did not support a requirement for non-residential developments to meet higher water efficiency standards to reduce water usage.

Seven neutral/other comment were received.

Summary of comments:

- Policy would need to be flexible as may be difficult for some operators to achieve and this could stifle economic growth (land promoter, developer) policy should encourage not require (developer).
- Viability concern (developer).
- Standards should be set through building regulations, not planning policy (developer)/ duplicating part G of the Building Regulations and forthcoming changes to the Building Regulations could cause confusion (landowner, developer).
- Policy would need to be fully justified and supported by a viability appraisal (developer).
- There should be rain water harvesting and grey water systems for large development (resident).
- Different councils operating different policies could slow development (developer).
- It would be helpful if neighbouring local authorities adopted similar policies (Newton and Biggin PC).

DESIGN CODING AND GUIDANCE

29. Should we produce design codes as part of our new local plan?

162 responses were received to this question.

136 responses supported the production of design codes as part of our new local plan.

19 responses did not support the production of design codes as part of our new local plan.

7 other responses were received.

Summary of comments:

- Producing a design code as part of a local plan would add additional expense and slow down the process (two developers).
- Design codes should be prepared collaboratively with developers (Home Builders Federation, developer).
- Current applications should be taken into account in producing a design code.
- Design codes are useful for giving specific areas an identity.
- Design codes should not be too prescriptive.
- Design codes should be informed by all statutory consultees and stakeholders and not conflict with other local plan policies (developer).
- Design codes should reflect the difference characteristics of different places.
- Design codes should identify design principles that take account of the nature and multi-functional role of the canal network and consider how new development proposals can benefit from waterside locations (Canal & River Trust).

30. Which areas should design codes cover?

(a) Borough-wide

(b) Borough-wide divided into character areas

(c) only for some neighbourhoods (please specify which),

(d) only for large new development sites

(e) other (please specify)

151 responses were received to this question.

47 responses supported a borough-wide design code.

76 responses supported a borough-wide design code divided into character areas.

3 responses felt that design codes should be only for some neighbourhoods.

23 responses supported design codes only for large development sites.

Two other comments were received.

Summary of other comments:

- Three responses felt that design codes should cover some neighbourhoods only, with Eden Park and Victorian terraces suggested.
- Three developers sought a flexible approach to design, based more on guidance than prescription.
- Pailton PC supported a borough-wide design code but suggested that large developments could jump start the policy and suggested the use of neighbourhood plans and village design statements.
- Two developers stated small to medium sized sites don't require design codes.
- One respondent suggested borough wide minimum quality and dwelling size requirements, similar to the London Plan.
- Two respondents suggested design codes should be introduced for conservation areas or other areas of architectural or historic value.
- One respondent felt that design codes would produce bland results and discourage modern or challenging architecture.
- One response felt that money would be better spent on other things than on the production of design codes.

- The master developer of Houlton said it should be exempt from the policy because there is already design coding in place for the site through the outline planning permission
- The Home Builders Federation stated that the most appropriate scale for any Design Code or Guidance is therefore likely to depend on the size, scale and type of development it is being applied to. A Site-Wide Masterplan prepared in conjunction with a site allocation would need to be different from a Design Brief for a city centre regeneration opportunity, or a small-scale development in a village.

LAND FOR HOUSEBUILDING

31. How many homes should we be planning for?

(a) Minimum local housing need

(b) The HEDNA 2022 need

(c) Other (please specify)

182 responses were received to this question.

83 responses supported minimum local housing need.

46 responses supported the HEDNA 2022 need.

48 responses suggested other options.

Five other/neutral comment was received .

Summary of other comments:

- 14 responses opposed building any more homes, citing infrastructure concerns.
- Two responses sought more social housing.
- The Home Builders Federation suggested the housing requirement was more than both the HEDNA and standard method. This view was also expressed by two residents and several landowners/land promoters and developers (as detailed below).
- Nine responses (four land promoters, four developers, landowner) said there would be unmet need from Coventry.
- Nine responses (three land promoters, five developers, landowner) argued the need to uplift to provide more affordable housing.
- Six responses (from three land promoters, two developers and the Home Builders Federation) argued the need to uplift from the HEDNA to sustain economic growth.
- Four responses (land promoter, two developers, land owner) argued the HEDNA should be a minimum.
- Three (landowner, land promoter, developer) argued planning to 2050.
- Two landowners responded supporting adding a 10% supply buffer.

- One developer argued that the HEDNA underestimated migration to Rugby Borough from London.
- The HEDNA doesn't demonstrate exceptional circumstances to justify departure from standard method, it exaggerates methodological issues in population estimates for Coventry and would risk under-supplying homes (developer).
- Supply is over-estimated (developer).
- A higher housing target would harm nature recovery (Warwickshire Wildlife Trust).
- The HEDNA is more robust evidence (Warwick and Stratford on Avon district councils).
- Oppose accommodating Coventry's unmet need (Thurlaston PC, Stretton on Dunsmore PC).
- There are exceptional circumstances based on overestimation of Coventry's population (landowner).
- If HEDNA is used it should be adjusted for suppressed household formation (developer).
- In 2025 ONS will publish household projections which correct for the Coventry issue and the standard method will be updated (developer).
- Plan period should be re-based as data becomes available.

The following other options were put forward:

- One response favoured a job-creation led housing target.
- Two responses (including Thurlaston PC) suggested a housing target between the standard method and HEDNA numbers.

32. Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Gardens and Biart Place)?

161 responses were received to this question.

143 responses supported improving existing and developing new social and affordable housing.

15 responses did not support improving existing and developing new social and affordable housing.

3 other comments/neutral responses were received.

Summary of comments:

- One affordable housing developer and one land promoter argued for an uplift to total housing need to deliver more affordable housing.
- One developer response suggested distributing affordable housing across the borough, rather than concentrating it in one location.
- One resident supported more affordable housing but not at the expense of green space.

33. Please provide any comments you have on the suitability of any of the broad locations listed above for new housing. Are there any locations that we have missed?

153 responses were received to this question.

Summary of comments:

Numerous responses from developers/landowners promoted specific sites.

Conversely, many respondents expressed their opposition to development in specific locations, often citing infrastructure, traffic or landscape concerns. At least 41 responses mentioned one or more locations in which the respondent opposed development.

Seven responses expressed opposition to development of Green Belt, while eight responses expressed opposition to development at villages.

Fewer resident responses expressed support for development in specific locations. The most popular such location was Rugby town centre (six responses). Three responses advocated for a policy of concentrating development at urban locations with better access to services. Conversely, two responses favoured a more dispersed pattern of development including smaller villages.

All of the indicative locations garnered some support from one or more respondent. Additional locations mentioned included Monks Kirby, Brinklow, Newton.

Other comments:

- Anti village developments (8 responses including Stretton on Dunsmore PC).
- Avoid Green Belt (8 responses), one developer stated there is no evidence for exceptional circumstances for Green Belt release.
- Anti Ryton on Dunsmore (4 responses).
- Anti Stretton on Dunsmore (5 responses including Stretton on Dunsmore PC based on floor risk, narrow roads and the sewage pumping station discharging into Princethorpe Brook also argue that Squires Road and Little Orchard shouldn't have been allocated).
- Anti Wolston.
- Anti east of Coventry.
- Anti south of Hinckley.
- Anti Wolvey (3 responses).

- Anti south of Hillmorton/Rainsbrook Valley (13 responses including Kilsby Parish Council).
- Anti South West Rugby (6 responses – including Thurlaston PC).
- Anti Clifton upon Dunsmore (7 responses).
- Anti Rugby generally.
- Pro main rural settlements in order to ease the pressure on the urban area (2 responses).
- Pro brownfield/town centre (6 responses).
- Pro east of Coventry (6 responses).
- Pro Wolston .
- Pro south of Hillmorton (4 responses).
- Pro Ryton on Dunsmore (3 responses).
- Pro south of Hinckley (2 responses).
- Pro Newton (developer).
- Pro Binley Woods (2 responses).
- Pro Dunchurch (3 responses).
- Pro Wolvey (2 responses).
- Pro Stretton (1 response).
- Housing should be close to public transport or urban areas to reduce car use (2 responses).
- Suggest development at smaller villages/ pro dispersal (2 responses).
- Housing should be close to employment areas .
- Pro Clifton upon Dunsmore (if A5 junctions upgraded).
- Favour large development with facilities over small dispersed sites

- Pro west of Rugby.
- Suggest development at Brinklow, Long Lawford and Monks Kirby.
- Objection to Linden Tree Bungalow allocation based on concerns about safety of access.
- Be mindful of gas/electricity assets in assessing sites (National Gas, National Grid).
- Comprehensive Green Belt study needed (landowner).
- Protect canal infrastructure from damage in considering site allocations and ensure development enhances role of canal corridors (Canal & River Trust).
- Consider education infrastructure requirements, the new plan should identify specific sites for school places to support growth (Department of Education).
- Produce a HELAA to ensure a strong and robust evidence base (Environment Agency).
- Allocate a range of sites across the settlements, with a preference for sites of 200-300 homes which can be delivered more quickly than the large SUE sites and deliver affordable housing (land promoter).
- Provide a range of deliverable and developable sites, 10% of housing requirement should be on sites no larger than one hectare (Home Builders Federation).
- If the Council allocated the South West Rugby safeguarded land for development (housing or employment) there needs to be a mechanism for it to contribute to and share the cost of infrastructure provision (Home England).
- Centre growth at borough's most sustainable settlements, with any new strategic allocations focusing on the town of Rugby (land promoter). Larger villages with more facilities may be more sustainable than urban edges remote from facilities (Newton & Biggin PC).
- Emphasis non-Green Belt location first (developer).
- Green Belt locations are the most sustainable and deliverable, site selection should focus on accessibility, community and social facilities, BNG and reducing carbon emissions (developer and land promoter).

- Additional development at South West Rugby on top of that which is already planned may mean that existing improvement plans require revision to ensure the full growth risk is resolved (Severn Trent Water).
- There are likely to be constraints with Rugby Newbold Wastewater Treatment Works (WwTW) due to the environmental capacity of the receiving waterbody, meaning that revisions to permits are increasingly tight and difficult to meet considering the best available technology (Severn Trent Water).
- Support extra care housing in rural locations (developer).
- Most important criteria in selecting new sites should be sustainability, including public transport (resident).
- In selecting sites avoid the Best and Most Versatile agricultural land.

34. Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?

155 responses were received to this question.

123 responses supported the proposed requirements. Among the supporters were five developers.

29 responses did not support the proposed requirements.

Three neutral/other comments were received.

Summary of comments:

- Those objecting cited concerns about viability, need for additional evidence to justify the policy.
- Two response expressed concern that the policy may not be technically deliverable.
- One developer and the Homes Builders Federation said it isn't needed in light of Building Regulations. Another suggested that future changes to Building Regulations will remove the need for this.
- Three responses from developers stated they would support the policy, but it should be flexibly applied to take into account site constraints and viability.

35. Please provide any comments you have on the type and size of new homes we need.

114 responses were received to this question.

Summary of comments:

- Affordable homes/homes that are affordable (26 responses) one response noted a need for social housing in the urban area.
- 2 and/or 3 bedroom homes (20 responses).
- Bungalows (17 responses).
- 1 beds/small homes (11 responses) – 2 responses suggested this will combat HMOs.
- Homes for ageing population (10 responses).
- More diversity of house sizes/a wide mix (6 responses).
- Call for flexibility site by site and to respond to market conditions (5 responses from developers).
- Improved quality homes (4 responses).
- Self-build plots (4 responses although Home Builders Federation stated that it does not support a percentage of units on a site being for self build)
- Apartment buildings (3 responses).
- Larger/executive homes (3 responses).
- Maisonettes (3 responses).
- Support use of HEDNA evidence on housing mix (2 responses).
- Larger 3 or 4 bed social housing.
- Purpose-built HMOs.
- Allocate sites for extra care (extra care developer) with the Home Builders Federation also calling for the allocation of sites for specialist development.
- Specialist care accommodation, not just adaptable housing (extra care developer).

- Passivhaus/carbon neutral homes.
- Affordable housing for NHS staff (NHS Property Services).
- Homes England noted that the HEDNA housing mix doesn't align with the Rugby Borough Council Housing Strategy 2022-2024 housing mix.
- One developer response opposed the Nationally Described Space Standard.

OTHER TOPICS

36. Are there any other issues or policies (not covered by the questions above) that we should cover in the new plan?

123 responses were received to this question.

Issues raised in multiple responses:

- Healthcare: Hospital provision/GPs/dentist/pharmacies (18 responses).
- Pot holes/ road improvements/traffic congestion (15 responses).
- Schools (13 responses).
- Inadequate parking (10 responses).
- Bus provision improvements and multi-mode passes (8 responses).
- Need for sport/leisure/play facilities/green corridors (8 responses).
- Sustainable drainage including rain water storage/flooding/water quality (8 responses, including Severn Trent Water response with proposed policy wording).
- Pro sustainable travel and creation of cycle paths (5 responses).
- More local services/facilities in large developments (5 responses).
- Green Belt protection (4 responses).
- Police and fire (4 responses).
- Protection of the rural landscape (3 responses).
- Rugby Parkway Station (2 responses) + one suggestion of a station at Long Lawford.
- Approach to Rugby town centre on A426 (attractiveness of) (2 responses).

Other issues raised (non-exhaustive list):

- Speed limit reduction.
- Opposition to '15 minute neighbourhoods'.
- Heritage preservation.

- Rerouting HGVs out of central Rugby.
- Appointment of sustainability champion.
- Poor design quality of new houses.
- Long-term food security.
- Swift bricks and hedgehog friendly boundaries in new developments.
- Need for more community/cultural spaces and protection of existing facilities.
- Creation of a rugby club with infrastructure for Premiership level to raise profile and attract visitors to the town.
- Opening up to the public of the tunnel under the station.
- Bus rail interchange.
- Local plan not overriding neighbourhood plans.
- Affordable housing.
- Improve footpath from Rugby to Draycote on disused railway line.
- River water quality in River Avon catchment (Stretton on Dunsmore PC).
- Need for additional allotments.
- Light pollution from warehousing (Churchover PC).
- Need for a site for a new Sikh temple (Rugby Sikh Gurdwara).
- Sites for locally produced food.
- Unadopted roads create problems for residents of new developments.
- Canal network should be recognised as a non-designated heritage asset (Canal & River Trust).
- Engage with Department of Education in preparing the plan and prepare a planning for schools topic/background paper setting out how forecast housing growth is translated into an identified need for a specific number of school places and schools (Department of Education).

- Groundwater and contaminated land should be a key sustainability issue (Environment Agency).
- Policy should require development to improve the ecological status of waterbodies to meet Water Framework Directive objectives as well as conserving and enhancing existing watercourses and riverside habitats (Environment Agency).
- Call for a heritage topic paper of heritage assessment section within a wider evidence document (Historic England).
- Don't deviate from 10% biodiversity net gain (Home Builders Federation).
- Local Plan should link with local nature recovery strategy (Home Builders Federation, Warwickshire Wildlife Trust) and applying it in site selection (The Woodland Trust).
- Everyone should be no more than 300m from their nearest natural green space. Apply Woodland Trust Access to Woodland Standard – 2ha wood within 500m of every home (Woodland Trust).
- Adopt Bristol Tree Replacement standard (Woodland Trust).
- Protect non-designated habitats like potential local wildlife sites (Warwickshire Wildlife Trust).
- Update green infrastructure evidence and identify corridors (Warwickshire Wildlife Trust).
- Incorporate playing pitch calculator and refer to Playing Pitch Strategy (Sport England).
- Allocate land for sports clubs that need new pitches e.g. Old Laurentians RFC (Sport England).
- Policy on protecting non-designated heritage assets including Coventry Stadium (Save Coventry Speedway).
- Produce updated evidence on landscape, Green Belt, transport, heritage, habitats and open space (resident).
- Identify new footpath provision (resident).
- Protect Princethorpe Biodiversity Area.

- Request for s106 contributions for health infrastructure (NHS Property Services).
- Oppose policy that would try to retain surplus NHS estate in alternative community use (NHS Property Services).
- Seek policy on healthy developments including health impact assessment, active travel, access to health food, design promoting social interaction (NHS Property Services).
- Designate Local Green Spaces (Natural England).
- Prepare a strategic transport assessment (National Highways).

37. Do you support our intention to bolster our policies on sustainable travel?

155 responses were received to this question.

127 responses supported bolstering policies on sustainable travel.

23 did not support bolstering policies on sustainable travel.

5 neutral responses or other comments were received.

Summary of comments:

- Four responses specifically sought links to Warwickshire County Council's Local Transport Plan 4 (LTP4) and a forthcoming transport plan for Rugby produced by the county council.
- One respondent, a developer, noted that LTP4 states that modern strategic logistics centres represent an opportunity to substantially reduce the carbon footprint of logistics through the efficiency and by accommodating electric vehicle charge points. The same respondent noted that LTP4 stated that it is important to located logistics on major routes.
- Stretton on Dunsmore Parish Council noted LTP4 Policy Position F1 to drive a mode shift of freight transport from road to rail.
- The Canal and River Trust noted the importance of canal towpaths for active travel.
- One resident stated that the problem wasn't the absence of policies but their under-enforcement.

**38. Do you support a policy protecting stadia as community and sports facilities?
If so, which stadia should we protect?**

139 responses were received to this question.

110 supported a policy protecting stadia.

28 did not support a policy protecting stadia.

One other comment was received neither expressing opposition or support.


The following stadia were put forward for protection:

- Sports Connexion, Ryton
- Coventry City training facilities
- Coventry Stadium, Brandon
- The Queen's Diamond Jubilee Centre
- All school sports fields and rugby and football pitches
- The Rugby Football Club
- Golf courses
- Rugby Town FC, Butlin Road
- Rugby Borough Football Club
- Ashlawn Recreation Ground
- Rugby School
- Rugby Gymnastics Club
- Rugby Thornfield Indoor Bowls
- Old Laurentians

Summary of other comments:

- Two comments suggested the creation of a rugby stadium in Rugby. Another argues new stadia are needed.
- One objecting response from a developer argued that a specific policy would duplicate national policy on protecting community facilities.
- Save Coventry Speedway argued for restoration of Coventry Stadium for speedway and stock car racing, but also its use for low capacity community uses (such as a gym, climbing wall, cycle training track, mountain bike track, links to National Cycle Network) and a museum for speedway and stock car racing.

APPENDIX 1: PRESS NOTICE



**RUGBY BOROUGH
COUNCIL**

**TOWN AND COUNTRY PLANNING
(LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012, SECTION 18**

Notice is hereby given of the publication of the Rugby Borough Council Local Plan Review Issues and Options for public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The public consultation will run between Monday 30 October 2023 and 5pm on Friday 2 February 2024.

The Issues and Options consultation document and supporting evidence will be available for inspection on the council's website:
www.rugby.gov.uk/localplan

In addition, hard copies are available for inspection at the following locations:

- Town Hall, Evreux Way, Rugby, CV12 2RR,
- Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
- Dunchurch Community Library, The Green, Dunchurch, Rugby, CV22 6PA
- Wolston Library and Information Centre, Warwick Road, Wolston, Coventry, CV8 3GX.

Consultation responses can be submitted via:

- online consultation form at www.rugby.gov.uk/localplan
- email to localplan@rugby.gov.uk with 'Local Plan Review: Issues and Options' in the subject line
- post to Local Plan Review: Issues and Options, Development Strategy Team, Town Hall, Evreux Way, Rugby, CV21 2RR

If you wish to be kept informed about future stages of the local plan review, please state this in your consultation response.

APPENDIX 2: CONSULTATION STRATEGY

Rugby Borough Local Plan Review – Issues and Options Public Consultation Strategy

Document Title: Rugby Borough Local Plan Issues and Options	
What we are doing, and why	
Nature of Plan being Prepared	This document is the first round of public consultation on the new Rugby Borough Local Plan.
Purpose of Consultation	The aim of this consultation is to ensure the wider public are aware of the review of the plan and give the public and other stakeholders an opportunity to submit representations.
Nature of issues that need to be consulted upon	There are a number of stages a plan must go through prior to adoption. This first stage is a broad consultation on the overall approach the new plan should take, including whether, and to what extent, we should review the plan at this time
Why we are consulting	<p>We are carrying out this consultation to ensure all individuals and groups who may be affected by or have an interest in the Local Plan have the opportunity to voice their opinions on whether and how to proceed, and what content should be considered if a full or partial review of the plan is progressed.</p> <p>Our ambition is therefore to publicise the consultation as widely as possible using all available tools at our disposal and going above and beyond the statutory requirements and even those identified in our Statement of Community Involvement.</p>
When consultation will take place	This consultation will run for eight weeks from Monday 30 October to Friday 22 nd December 2023.
How we will publicise the consultation	
Direct notifications	<p>In accordance with the Regulations and the council’s Statement of Community Involvement the following groups will be notified directly of the consultation. This will be done by email where possible with letters sent to those for whom an email address is not available:</p> <ul style="list-style-type: none"> • all statutory consultation bodies; • all parish councils; and • all groups and individuals who have opted to be on the council’s consultation database.
Direct engagement with Parish Councils	In addition to directly notifying Parish Councils, we will hold an event where three representatives of each parish council will have the opportunity to engage with officers and ask their questions.

	<p>We want to engage closely with Parish Councils in recognition of their unique understanding of their local communities, and the role many are playing in neighbourhood planning.</p>
Local publicity	<p>The consultation will be promoted in the following ways, in line with the council's Statement of Community Involvement:</p> <ul style="list-style-type: none"> • information and documents will be published on the council's website; • the consultation will be advertised in the local newspaper; and • paper copies of the documents will be available to view at the Town Hall, Rugby Library, Dunchurch Community Library and Wolston Library. <p>In addition to making consultation documents available at the above locations, a series of display boards will also be provided to draw further attention.</p> <p>We will also ask parish councils to publicise the consultation in their parish newsletters/magazines and on noticeboards.</p> <p>We will identify community and faith groups and contact them to let them know about the consultation.</p>
Use of digital technology	<p>We will promote the consultation via the Council's social media channels:</p> <ul style="list-style-type: none"> • Facebook • Twitter <p>We will work with the Communications team to schedule social media posts to coincide with the launch of the consultation, the mid-point, and a final reminder of the consultation deadline as a minimum.</p> <p>Social media may also be used to promote events (see below) scheduled through the consultation period, which will enable interested parties directly engage with officers to ask questions.</p> <p>We will also explore the potential to develop a short, animated video to explain in 2-3minutes what the consultation is and why it is important. Such videos have been used to some effect for both the Warwickshire Local Transport Plan, and the South Warwickshire Local Plan Issues and Options.</p> <p>The video may be shared via the following methods:</p> <ul style="list-style-type: none"> • On the Council website • Via the social media channels outlined above • At events (see below)
Events	<p>A series of events will be held to enable interested parties to obtain further information and have their questions answered.</p>

	<p>Some of these events will be in person, and some online. This provides different opportunities for individuals to engage directly with officers, allowing for different personal preferences, capacity to travel, and balancing such events with other commitments.</p> <p>Exact dates, times and locations are to be confirmed, but in outline the following is proposed:</p> <p>Online events (MS Teams)</p> <ul style="list-style-type: none"> • two open 1 hour events, at least one to be in the evening • A short (15minute) presentation from officers to outline the context, followed by 45-minute Q&A • Questions to be added in the chat function <p>In- person events</p> <ul style="list-style-type: none"> • Six in person events – drop-in sessions at Rugby town centre, Dunchurch, Wolston, Cawston, Brownsover, Wolvey
Engagement with the business community	The Senior Economic Development Officer will publicise the consultation with the Chamber of Commerce, Warwickshire Growth Hub and local businesses.
Accessible Inclusive Consultation	<p>As outlined above the consultation will be promoted both online and in the local newspaper and the document will be available to read both online or in hard copy form.</p> <p>In addition to this, to ensure the consultation is accessible and inclusive, the following measures will be put in place:</p> <ul style="list-style-type: none"> • Paper copies of the documents can be posted out to individuals upon request; • Individuals can call or email to discuss the document with a planning officer; • Adapted versions of the document can be produced on request, e.g. large print; • Representations can be submitted by email or post.
How comments will be taken into account	<p>Each representation will be read and carefully considered. Representations will be taken into account in the preparation of the new plan along with national policy and the evidence base.</p> <p>Before a plan can be adopted it must be examined in public by a planning inspector.</p>
How comments will be reported	<p>A consultation statement will be published following the close of the consultation. This will include:</p> <ul style="list-style-type: none"> • a list of the persons consulted; • a summary of each representation; and • a comment on how each representation has been considered.

Appendix 3 Local Plan Project Risk Register (updated January 2025)

RUGBY BOROUGH COUNCIL PROJECT RISK REGISTER

Project: updated Local Plan (October 2024)

Objective: to prepare and adopt a new local plan for the borough

		Likelihood			
Impact	4	M	H	H	H
	3	L	M	H	H
	2	L	M	M	H
	1	L	L	M	M
		1	2	3	4

Risk	Opportunities	Consequences	Controls	Responsibility	Assessment of Risk		
					Likelihood	Impact	Risk Score
					2	4	6
1. Potential finding of an inspector that the new Local Plan is not legally compliant or is not sound..		<ul style="list-style-type: none"> - Delay as potential need to re-consult on modifications, go back and re-do parts of the process or even withdraw the plan - Reputational damage. - Stakeholder concerns/complaints - Adverse media coverage - Risk of legal challenge - Dealy in getting a plan adopted, leading to loss of appeals 	<ul style="list-style-type: none"> - Compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Planning and Compulsory Purchase Act 2004. - Compliance with national policy and guidance. - Effective joint working with duty to cooperate partners. - Holding two Regulation 18 public consultations. - Careful consideration of representations made. - Preparation of proportionate evidence to support the plan's policies. - Consideration of reasonable alternatives through the sustainability appraisal process. - Potential for a legal review prior to plan submission (if deemed to be required). 	Chief Officer Growth and Investment/ Development Strategy Manager			

Risk	Opportunities	Consequences	Controls	Responsibility	Assessment of Risk		
					Likelihood	Impact	Risk Score
2. Loss of team members / inadequate resourcing / inability to fill posts		<ul style="list-style-type: none"> - Lack of continuity, loss of institutional knowledge - Delay - Increased costs through need to use consultants 	<ul style="list-style-type: none"> - Prioritisation and effective time management to maximise the resources we have - Communication - Effective recruitment - Flexible use of resources within the planning department to assist - Potential use of consultants if necessary 	Chief Officer Growth and Investment/ Development Strategy Manager	4	3	7
3. Delay to the local plan process due to changes to government policy. NPPF is updated but this risk now arises through national DM policies and changes to the PPG	Opportunities to reflect new national policy.	<ul style="list-style-type: none"> - Increased or wasted costs - Delay - Public perception 	<ul style="list-style-type: none"> - Monitoring and responding to government policy, including responding to consultations - Keeping the local development scheme under review 	Chief Officer Growth and Investment/ Development Strategy Manager	3	3	6
4. Change of political party/control of the council results in policy or financial changes impacting project delivery	Review of project	<ul style="list-style-type: none"> - Delay - Increased or wasted costs - Reputational damage 	<ul style="list-style-type: none"> - Use of Planning Services Working Group to seek cross-party support. - Council decision making at relevant stages. 	Chief Officer Growth and Investment/ Development Strategy Manager	3	3	6
5. Political disagreement with neighbouring authorities/ ineffective cooperation		<ul style="list-style-type: none"> - Failure to meet duty to cooperate (see risk 1 above) - Reputational damage - Delay 	<ul style="list-style-type: none"> - Joint working through the Coventry, Warwickshire and Solihull Association of Planning Officers (CSWAPO) - Preparation of statements of common ground 	Chief Officer Growth and Investment/ Development Strategy Manager	2	4	6

Risk	Opportunities	Consequences	Controls	Responsibility	Assessment of Risk		
					Likelihood	Impact	Risk Score
6. Local government reorganisation: successor authority elects not to adopt local plan		<ul style="list-style-type: none"> - Wasted work and cost 	<ul style="list-style-type: none"> - No controls possible 	Chief Officer Growth and Investment/ Development Strategy Manager	1	4	5
7. Delays in consultants providing evidence/ poor quality evidence		<ul style="list-style-type: none"> - Delay - Increased cost if need to re-do evidence 	<ul style="list-style-type: none"> - Joint procurement of evidence with CSWAPO - Effective procurement procedures including writing clear briefs - Careful and ongoing management of consultants 	Chief Officer Growth and Investment/ Development Strategy Manager	1	2	3
8. Cost overruns		<ul style="list-style-type: none"> - Reputational damage - Budgetary pressures 	<ul style="list-style-type: none"> - Focussing evidence tightly on justifying policies - Joint commissioning of evidence with neighbouring authorities - Effective project management 	Chief Officer Growth and Investment/ Development Strategy Manager	3	2	5
9. Delays in updating of the Rugby area model		<ul style="list-style-type: none"> - If Warwickshire County Council's update to the Rugby area model isn't complete to allow strategic transport assessment to progress this could delay the LDS timeline 	<ul style="list-style-type: none"> - Seek assurances from WCC that this will be prioritised 	Chief Officer Growth and Investment/ Development Strategy Manager	3	3	6
10. Strategic Transport Assessment and National Highways		<ul style="list-style-type: none"> - The strategic transport assessment could identify problems with proposed site allocations and/or National Highways could object - The consequences could be delay or a need to revise the draft plan. 	<ul style="list-style-type: none"> - Working with WCC to prepare the STA - Engagement with National Highways 	Chief Officer Growth and Investment/ Development Strategy Manager	2	3	5
11. Delivery of secondary education spaces		<ul style="list-style-type: none"> - There is a risk of a plan being found unsound due to inability to meet future need for secondary education spaces 	<ul style="list-style-type: none"> - Work with Warwickshire CC to understand future places requirement - Seek to identify a feasible secondary school site - Explore all options to fund a school 	Chief Office Growth and Investment/ Development Strategy Manager	3	3	6

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2021-2024) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment, Development Strategy
Policy/Service/Change being assessed	Draft Rugby Borough Local Plan 2024-2045
Is this a new or existing Policy/Service/Change?	New policy
If existing policy/service please state date of last assessment	N/A
Ward Specific Impacts	All wards
Summary of assessment Briefly summarise the policy/service/change and potential impacts	The local plan seeks to advance a ambitious climate and nature agenda through its policies and site allocations. Overall, the impacts should be positive on wider climate change strategy objectives.
Completed By	Neil Holly
Authorised By	Nicola Smith
Date of Assessment	3 February 2025

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No impact on council owned resources			
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No impact on the production of energy for council activities			

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan includes an ambitious net zero policy for new buildings.	N/A		
Transport	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan includes draft allocations for new housing employment land to be developed in the period to 2045. Locations were selected for the access to services and facilities or (in the case of employment land) workforce. This should have a significant beneficial effect ahead of not putting a plan in place.	N/A		
Natural Environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan includes requirements for 20% canopy cover for new major development, delivery of biodiversity net gain close to development sites and for the allocation of significant new public open space/country parks. This should have an overall positive impact. There will be negative impacts of the quantum of development proposed	N/A		

Appendix 4

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
				buy the council does not have the choice to pursue lower scales of new development.			
Homes and Energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan includes an ambitious net zero policy for new buildings. Locations that are potentially suitable for renewable energy development are identified in the plan.			
Waste, Resources and the Circular Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste and minerals planning are 'county matters' and the responsibility of Warwickshire County Council.			
Climate and Nature Positive Communities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Overall the climate and nature policies should support climate positive new and existing communities			
Adaptation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	New policy moves adaption principles form the existing SPD into policy to give them more weight.			

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	October 2025
Key points to be considered through review	Responses to the public consultation on the draft plan Further new evidence produced to support the draft plan
Person responsible for review	Neil Holly
Authorised by	Nicola Smith

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Development Strategy
Policy/Service being assessed	Local Plan preferred option
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	New policy – the draft new local plan 2024-2045 is proposed to be consulted upon.
EqlA Review Team – List of members	Neil Holly – Development Strategy Manager
Date of this assessment	3 February 2025
Signature of responsible officer (to be signed after the EqlA has been completed)	Neil Holly

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Chief Officer for Legal and Governance.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The report seeks approval to consult on a new draft local plan for Rugby Borough covering the period 2024-2045.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	Producing a new local plan is central to advancing all corporate priorities.
(3) What are the expected outcomes you are hoping to achieve?	The consultation is the next stage of preparing a local plan in line with the council's adopted Local Development Scheme. The next stage thereafter will be preparation of a Regulation 19 pre-submission version of the plan.
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	The policy will affect customers and the wider community and groups.
(5) Will the policy or decision involve substantial changes in resources?	Yes. Natural resources will be changed as land is built on. Money will be used to fund building. Land allocated for development will become more valuable.
<u>Stage 2 – Evidence about user population and consultation</u>	As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

<p>(1) What does the data tell you about the groups this policy or decision impacts?</p> <p>Possible data sources:</p> <ul style="list-style-type: none"> • national statistics/census data • local statistics • evaluations • analysis of complaints • user feedback • outcomes from consultation/community voice • Council published information, service data • District and Ward Profile – Warwickshire Observatory • Office of National Statistics • Fingertips health profiles • Indices of Multiple Deprivation • RBC Annual Workforce Equality Report 	<p>The decision will impact all residents. This includes both rural and urban residents.</p> <p>The Gypsy and Traveller community is identified in view of the need to identify pitches. The Gypsy and Traveller Accommodation Assessment 2025 ('GTAA' to be published with the consultation).</p> <p>The GTAA is based on face to face survey interviews with 76 Gypsy and Traveller households. There are 102 households living on pitches in Rugby Borough.</p> <p>To understand future housing and economic development needs a Housing and Economic Development Needs Assessment and Strategic Employment Sites Study were undertaken jointly with other local authorities.</p> <p>A range of other evidence has been commissioned to support proposed policies.</p>
<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>A public consultation on local plan issues and options was undertaken between the end of October 2023 and the start of February 2024.</p> <p>The results of that consultation are reported to cabinet and council as part of the report and inform the draft plan.</p> <p>The consultation was based on issues, with some policy proposals. However, it was not a draft plan.</p> <p>As identified above, the Gypsy and Traveller community were consulted by our specialist consultants through preparation of the Gypsy and Traveller accommodation assessment. This shows the need for new pitches which informs the new policy and site allocations</p>

(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.

Stage 3 – Analysis of impact

(1) Protected Characteristics
 From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?

 If yes, identify the groups and how they are affected.

Protected Characteristic	Nature of Impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
Age	Neutral	
Disability	Positive Proposed policy is for 100% of new homes to be adaptable and 10% to be wheelchair user dwellings. This would not be required otherwise	Medium
Sex	Neutral	
Gender reassignment	Neutral	
Marriage/civil partnership	Neutral	
Pregnancy/maternity	Neutral	
Race	Positive impact through the allocation of pitches for Gypsies and Travellers as compared with a do nothing approach.	Medium



Noisy-le-Roi, France	Religion/belief	Neutral	
	Sexual Orientation	Neutral	
(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive The plan would increase delivery of affordable housing. The planned employment land would provide job opportunities for residents.	Medium
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Positive There would be improvements to access to facilities in some villages. Increasing the supply of housing should in aggregate improve the housing status of residents. There should be improvements to access to green space for some residents through the provision of new publicly accessible greenspaces.	Medium
(3) Using the information gathered in stages 2 and 3, what will the positive impact of the strategy/policy be on equality?	More disability accessible and adaptable housing. More affordable housing, job creation and creation of publicly accessible greenspace. Provision of new pitches for Gypsies and Travelers.		

<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>This question isn't applicable to the proposed local plan.</p>
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>We will be consulting on the preferred local plan policies. The questionnaire, which will be set up with comms, is likely to collect equality monitoring data.</p>
<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	<p>N/A</p>

<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	<p>N/A</p>
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<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>																														
<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1" data-bbox="891 647 2130 874"> <thead> <tr> <th data-bbox="891 647 1135 722">Action</th> <th data-bbox="1135 647 1379 722">Lead Officer</th> <th data-bbox="1379 647 1624 722">Date for completion</th> <th data-bbox="1624 647 1868 722">Resource requirements</th> <th data-bbox="1868 647 2130 722">Comments</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>	<p>This EqlA will be reviewed again when the next stage of the plan is presented to Cabinet, in autumn 2025 (1 September 2025).</p>																													

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on 3 February 2025 and will be reviewed on 1 September 2025.’ The policy will not be annotated with this statement. This is not appropriate for a draft local plan.

Draft Communications Plan – Local Plan Preferred Options Consultation

Key Messages

The key messages to be communicated:

1. We want you to have your say
2. How to have your say
3. What the preferred development strategy is and how it has been arrived at
4. Why we think the preferred development strategy is the best option

Communication

The table below outlines key elements of the draft communications plan for the Preferred Options consultation.

Key messages 1 and 2 will transcend across the range of communication methods, and follow both our statutory requirements and the commitments in the Statement of Community Involvement (SCI).

Key messages 3 and 4 will be the focus of the video, leaflets, and materials produced to support events. They will also form part of the overall social media strategy.

Communication type	Objective of communication	Medium	When?	Notes
Consultation launch and general awareness				
Press release	General awareness that consultation is happening	RBC website Local media (print and online)	At beginning of consultation	Development Strategy to liaise with communications team
Press notice	General awareness that consultation is happening	Rugby Observer	w/c 24March	Press notice drafted.
Emails and letters to the Development Strategy Consultation database	General awareness of the consultation to those who have registered interest and to statutory bodies	Emails Letters	At the beginning of the consultation – 24 March	

Communication type	Objective of communication	Medium	When?	Notes
RBC web pages	To provide information on the consultation, including: <ul style="list-style-type: none"> • The Preferred Option Plan • How to respond to the consultation (including online survey link as an option to respond) • Links to evidence base documents • FAQs • Schedule of events (see below) • Video (see below) 	RBC website	To be maintained throughout the consultation period and beyond	Upload of information discussed with communications officers
Survey Monkey online survey	Primarily a method of feeding back regarding the consultation, though an 'executive summary' of key information will precede the consultation questions.	RBC website	To remain available throughout the consultation	Receiving responses in this format makes the consideration of responses more efficient, and often more effective as it is clear what the 'answer' relates to.
Social media	Sharing key information throughout the consultation to seek to engage local residents, including: <ul style="list-style-type: none"> • Consultation launch • Animated video – the development strategy (see below) • Advertising events/event reminders • Policy themes (i.e based on sections of the draft plan) 	Facebook Instagram LinkedIn X	A social media strategy and schedule is in development. Posts will be made regularly throughout the consultation.	Social media plan in preparation. It will aim to present different information to appeal to different sections of the audience.

Communication type	Objective of communication	Medium	When?	Notes
Video (animated)	To succinctly explain (circa 2-3 minutes maximum) the stage of plan preparation, introduce the preferred development strategy (using the key diagram) and set out why it is the preferred strategy.	RBC website RBC Social media	To be uploaded to the website at the beginning of the consultation and shared on social media	Scripted by Development Strategy and animation arranged by Communications team.
Leaflets	To summarise the development strategy (using the key diagram), and set out why it is the preferred strategy	Print - to be provided at drop-in events (see below), and available at other locations, including local libraries and the town hall.	Throughout the consultation	QR code will allow direct navigation to the relevant RBC web page.
Hard copy access	In line with the requirements of the SCI, hard copies of consultation information to be supplied to local libraries and the Town Hall. This provides an alternative to online material.	Print	To be placed in these locations ahead of the consultation.	Dunchurch library is closed on Mondays. Wolston library is open 10.30-1 on Fridays and 2.30-5 on Mondays.
Events				
All RBC Councillor briefing	Briefing to councillors	In person	25 March 2025 – 6pm	Briefing to be held in the Benn Hall. Invitations have been sent
Parish Council briefing	Briefing for representatives of all parish councils in the borough	In person	TBC – first two weeks of consultation	Venue tbc – likely Benn Hall
In person drop-in sessions hosted by officers in locations across the borough	To allow local residents to pose questions and find out more about the content of the draft plan. This aims to help residents make informed consultation responses.	In person	x7 drop-in sessions be scheduled throughout the consultation period, but specifically avoiding the	Locations identified (based on the spatial strategy): <ul style="list-style-type: none"> • Brinklow

Communication type	Objective of communication	Medium	When?	Notes
			<p>two week Easter school holiday (14-25 April).</p> <p>Times tbc, but exploring venue availability for 6-8pm in each location. Local residents can drop-in at any point in the session, and do not need to stay for the duration.</p>	<ul style="list-style-type: none"> • Clifton upon Dunsmore • Dunchurch • Long Lawford • Rugby (town centre) • Ryton or Stretton • Wolvey <p>Printed display information will be available to view and discuss, plus leaflets (see above) available to take way. All will include QR codes so attendees can link to further information on their mobile devices.</p>
Public online information sessions	To provide a summary of key information at the beginning, followed by a Q&A with officers	Online - Teams	TBC – will seek to hold at different times of day.	Held as a normal MS Teams meeting.
Advertising events				
Posters	To advertise in person events – dates, times, locations	Print Social media	At the beginning of the consultation period	<p>The use of posters (both physically and via social media proved very effective in the Issues and Options consultation.</p> <p>Propose some posters with the full list of events, plus each event will have its own poster, that will be</p>

Communication type	Objective of communication	Medium	When?	Notes
				shared with the relevant parish council. Print copies can be placed on Parish noticeboards, and virtual copies have potential to be shared via local web pages and social media accounts.
Facebook events	To create the in person drop in events as 'Facebook events', to further promote them to local residents. It may also assist in gauging the level of interest in the event.	Social media	When scheduled	Communications team has used this approach before, and are exploring the best way(s) to share the events – potentially based on a local geography &/or by sharing the event into known local community groups.
Sharing the link for online events	To raise awareness of the opportunity to join an online Q&A event.	RBC website RBC social media	When scheduled	

AGENDA MANAGEMENT SHEET

Report Title: Non Domestic Rate Discretionary Rate Relief

Name of Committee: Cabinet

Date of Meeting: 4 March 2025

Report Director: Chief Officer - Finance and Performance

Portfolio: Finance and Performance, Legal and Governance

Ward Relevance: All Wards

Prior Consultation: None

Contact Officer: Richard Moore, Revenues Manager
richard.moore@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: No

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
 A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
 A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
 A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
 This report does not specifically relate to any Council priorities but

Summary: This report summarises changes to the Non Domestic Rates discretionary relief policies from 1 April 2025 onwards.

Financial Implications:	This new policy will ensure any relief awarded will be to local organisations and maintain the cost to the council of the discretionary rate scheme.
Risk Management/Health and Safety Implications:	There are no risk management implications arising from this report.
Environmental Implications:	There are no environmental implications arising from this report and no Climate Change Impact Assessment is required.
Legal Implications:	<p>The relevant powers for this report are contained within the following legislation:</p> <p>Section 47 Local Government Finance Act 1988 (Non Domestic Rate) Section 49 Local Government Finance Act 1988 (Non Domestic Rate) Section 44a Local Government Finance Act 1988 (Non Domestic Rate)</p> <p>The council has discretionary powers under the above legislation, and subsequent amending legislation, to award relief in line with its adopted policy.</p>
Equality and Diversity:	All reliefs are considered with due regard to any potential equality and diversity impact and on their own merits. This decision has been judged to have no or a very small impact on local people and communities and an EDIA is not required.
Options:	<ol style="list-style-type: none"> 1. To approve the guidance outlined in this report and appendices 1, 2 & 3 from 1 April 2025. 2. To reject the proposal and continue with the current guidance, which may result in additional cost to the council.
Recommendation:	The Discretionary Rate relief guidance at Appendices 1,2 & 3 be approved.
Reasons for Recommendation:	The guidance was last reviewed in 2017 and needs to be updated.

Cabinet - 4 March 2025

Non Domestic Rate Discretionary Rate Relief

Public Report of the Chief Officer - Finance and Performance

Recommendation

The Discretionary Rate Relief guidance at Appendices 1, 2 & 3 be approved.

1. Background

- 1.1 Sections 47, 49 and 44a of the Local Government Finance Act 1988 gives Councils the power to grant rate relief to organisations that meet certain criteria.
- 1.2 Councils have discretion to grant rate relief under (s47 LGFA 88) from all or part of the amount of non-domestic rates payable. Any relief granted is used to reduce the amount the organisation is required to pay in business rates.
- 1.3 To qualify for relief, properties must be occupied by charities, sporting organisations or not for profit bodies wholly or mainly for charitable purposes or for the purpose of recreation.
- 1.4 We recognise the valuable role that voluntary organisations can and do play in the life of the community. It is committed to providing high quality services to Rugby residents and acknowledges the way voluntary groups can complement these services.
- 1.5 It is important therefore that the limited funds the council has available are targeted to support those local, non-profit making organisations who do most in our community.
- 1.6 In general terms schools, housing associations, national charities, national charity shops and organisations that provide gaming facilities and /or a licenced bar as a major function are unlikely to be granted discretionary relief.
- 1.7 The council can award up to 100% discretionary rate relief to those charities are other organisations where contractual commitments exist with the council. This alleviates the need for the council to provide services direct and where additional costs would fall on the local council taxpayer.
- 1.8 The updated guidance is shown in full at Appendix 1.

- 1.9 Section 49 of Local Government Finance Act 1988 gives councils discretion to reduce or remit all or part of the amount of non-domestic rates payable in circumstances where the ratepayer is enduring financial hardship. Any relief granted is used to reduce the amount the organisation is required to pay in business rates.
- 1.10 In order to reduce or remit an amount, the council must be satisfied that the ratepayer is locally based, provides services or activities to the benefit of the local community and would sustain hardship if it did not make an award.
- 1.11 The updated guidance is shown in full at Appendix 2.
- 1.12 Section 44a of Local Government Finance Act 1988 gives councils discretion to request the Valuation Office Agency to split a non-domestic property rateable value between the occupied and unoccupied parts, provided this situation exists for a short period (no more than 12 months).
- 1.13 This allows the council to award empty relief on the unoccupied portion.
- 1.14 As the relief has a direct impact on the councils income, any application should take account of the best interests of the council taxpayer.
- 1.15 In general terms the council will look more favourably on applications from businesses planning a phased occupation of new premises over one where the business is planning a phased vacation.
- 1.16 The updated guidance is shown in full at Appendix 3

2. Financial Implications

- 2.1 The cost of any relief awarded reduces the amount that the council keeps under the business rate pooling arrangements.
- 2.2 This means that it is important that the council carefully considers all applications to ensure that the local taxpayer benefits from any relief granted through services being available that would otherwise not be.
- 2.3 In the financial year 2024/25, the council supported 66 local organisations with discretionary rate relief. The total amount of the relief awarded was £128,246. As the council is part of the Warwickshire Business Rate pooling agreement, the cost to the council of awarding this relief is £51,298

Name of Meeting: Cabinet
Date of Meeting: 4 March 2025
Subject Matter: Non-Domestic Rate Relief
Originating Department: Finance and Performance

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Non-Domestic Rates – Discretionary Rate Relief

Introduction

Section 47 of the Local Government Finance Act 1988 gives Councils the power to grant rate relief to organisations that meet certain criteria.

Councils have discretion to grant rate relief from all or part of the amount of non-domestic rates payable and any relief granted is used to reduce the amount the organisation is required to pay in business rates.

The Council recognises the valuable role that voluntary organisations can and do play in the life of the community. It is committed to providing high quality services to Rugby residents and acknowledges the way voluntary groups can complement these services.

The following sections set out the factors we will consider when deciding whether to grant relief, and the way in which we will decide the value of any relief granted.

We will deal with each application for relief on its merits and treat all organisations that apply equally and fairly.

Criteria

The criteria to be used in deciding whether to give discretionary rate relief are designed to assess how an organisation's work helps achieve the Council's priorities and meet the community's need for services and facilities.

The Council will consider applications for relief where the following key criteria are met:

- the ratepayer is a non-profit making body;
- the property is used by the ratepayer wholly or mainly for charitable, philanthropic or religious purposes, or concerned with education, social welfare, science, literature or the fine arts; or
- the ratepayer uses the property wholly or mainly for recreation by a non-profit making club or society.
- The ratepayer occupies the property wholly or mainly to provide services that would otherwise have to be provided by the local authority.

Registered charities in receipt of mandatory relief of 80% can apply for discretionary relief on the remaining 20% of their bill.

Other organisations that meet these criteria, such as voluntary organisations and not-for-profit sports clubs, can apply for relief of up to 100%.

The Council will not normally consider applications from organisations in the following categories;

- National Charity Shops
- Organisations whose objectives are wholly or mainly concerned with education and which are already receiving Mandatory relief (80%)

- Administrative offices of national charitable organisations which are already in receipt of Mandatory relief (80%)
- Organisations which have a commercially operative bar within the relevant property serving alcohol.
- Organisations that have an audited income of more than £1 million per annum.

The following additional criteria will also be applied where applicable:

Equal opportunities - The organisation should have an appropriate policy that aims to give equal opportunities to both any employees it has and to people in the community it services. A copy of a formal policy should be submitted with the discretionary relief application. If a written policy is not available, evidence must be provided that the organisation does not unfairly discriminate against any section of the community.

Open access to membership - Membership should be open to all sections of the community. There may be some restrictions placed on ability in sport if this is appropriate, however, in general membership should not be exclusive or restrictive.

Membership fees – These must not be set at such a level as to exclude the general community. The Council would expect applicants to state their current membership rates, and to illustrate that the criteria used to consider applications for membership is consistent with the principle of open access.

Applications will be dealt with more sympathetically if an organisation can demonstrate it actively encourages membership from, or offers support to, particular groups in the community such as young people, women, older people, persons with a disability or ethnic minorities.

Beneficiaries of services or facilities - The organisation should provide training or education to its members, and non-members such as young people, people with disabilities, or retired people. The organisation should provide facilities that indirectly relieve the Council of the need to do so or enhance and supplement those it does provide.

Affiliation to local or national organisations - The organisation should be actively involved in local/national development of their interests.

Financial support from external sources - Copies of the organisation's last two years' audited accounts must be provided with the application to assist the Council in assessing the ability of the applicant to meet the costs of rates in the absence of additional rate relief. It should be made clear on the application form the level of funding given to the organisation by the Council and or any other external bodies.

Amount of relief

As noted above, the Council has the discretion to allow relief at any rate up to 100% of the business rates charge, less any mandatory relief an organisation is entitled to.

Entitlement will be assessed against the criteria and factors described above.

Period of award

The Council will decide the period that relief will be awarded for depending on the circumstances of the application. The minimum period of relief that can be awarded is one day.

Unless stated otherwise, relief will be awarded from the start of the current financial year or the date liability started, whichever is later. The Council will periodically review the relief and invite renewal applications.

If after review, the relief is no longer applicable and to be cancelled, the Council will write to you to notify you. The relief can be cancelled back to the date it was no longer applicable, but will not be cancelled earlier than the start of the previous financial year.

Relief may be backdated to the beginning of the current financial year.

How to apply

A claim must be made on an approved application form which is available on rugby.gov.uk/business-rates or on request.

It is the responsibility of the organisation applying for relief to provide sufficient information and documentary evidence to support its application.

Completed applications, including all necessary supporting documentation, should be sent to:

Rugby Borough Council, Town Hall, Rugby CV21 2RR

or emailed to nondom.rates@rugby.gov.uk.

Where further information is required, we will request this and allow a minimum of 21 days for it to be provided.

If this is not received, we will still consider the application but only on the basis of the information and evidence in our possession.

Subsidy Control

Please note that any award of discretionary rate relief must comply with the UKs Subsidy Control Act 2022 (replacing EU state aid)

Financial aid is allowed under the de minimis rules if the total amount of funding received by an organisation does not cumulatively exceed £315,000 over a three-year period.

Any assistance you have received, or are due to receive, from a public body may count as de minimis. This could be any aid, grant or support from central, regional or devolved governments, agencies, or a local authority.

Right of appeal

If you disagree with a decision made under this policy, you may write and tell us why you think our decision is wrong. If you are able to provide further information to address the reasons given as to why your application was unsuccessful, you may do so and we will reconsider our decision in the light of the new information.

If the Council's decision is still not to award relief, you may ask for a full review. The Chief Officer for Finance and Performance, who is not involved in the original decision, will check your application and supporting evidence thoroughly, taking into account any further information given in your appeal letter, then decide whether the policy have been properly applied in your case.

The Chief Officer has the authority to

- confirm the decision;
- change the decision and award you more discretionary rate relief; or
- change the decision and award you less discretionary rate relief.

The Council will write to tell you what has happened, normally within 7 days of the decision.

There is no further right of appeal against a decision made.

Non-Domestic Rates – Hardship Relief

Introduction

Section 49 of the Local Government Finance Act 1988 gives the council discretion to reduce or remit the whole of an amount a person is liable to pay to it.

All applications for Hardship Relief will be considered on their own merits. In order to make an award of Hardship Relief, the Council must be satisfied that the ratepayer would sustain hardship if it did not make an award and that it is reasonable to do so, having regard for its council tax payers.

Criteria

The following criteria will be used to consider whether a Hardship award should be made;

- Whether the accounts of the business are up to date and show financial difficulty. Consideration will also be given to the level of director remuneration.
- Whether the business is locally based, how many units it occupies, the number of local employees and the length of time the business has been trading.
- Businesses that are primarily national or international, so with properties outside of Rugby, will normally be excluded from receiving Hardship relief.
- That the business provides services or activities that benefit the local community.

How to apply

To apply, please provide a detailed explanation of why you are applying and how you meet the criteria above. You should also include 2 years of certified accounts. You can send applications by email to nondom.rates@rugby.gov.uk or to **Revenues Service, Town Hall, Rugby CV21 2RR**

Where further information is required, we will request this and allow a minimum of 21 days for it to be provided.

If this is not received, we will still consider the application but only on the basis of the information and evidence in our possession.

Amount of relief

Relief can be awarded for 1 year only up to a maximum of £2,000

Right of appeal

If you disagree with a decision made under this policy, you may write and tell us why you think our decision is wrong. If you are able to provide further information to address the reasons given as to why your application was unsuccessful, you may do so and we will reconsider our decision in the light of the new information.

If the Council's decision is still not to award relief, you may ask for a full review. The Chief Officer for Finance and Performance, who is not involved in the original decision, will check your application and supporting evidence thoroughly, taking into account any further information given in your appeal letter, then decide whether the policy have been properly applied in your case.

The Chief Officer has the authority to

- confirm the decision; or
- change the decision and award you more Hardship relief.

The Council will write to tell you what has happened, normally within 7 days of the decision.

There is no further right of appeal against a decision made.

Non-Domestic Rates – Part occupation Relief

Introduction

Section 44a of the Local Government Finance Act 1988 gives the council discretion to request the Valuation Office Agency to split a non-domestic property rateable value between the occupied and unoccupied portions. The council would then be able to award empty relief on the unoccupied portion.

This discretionary power does not alter the general rating law principle the occupation of part of a premise is occupation of the whole of the property.

Criteria

The main consideration is that as any relief granted has a direct impact on the councils income, it must be in the best interests of the Rugby council tax payers. Any application will therefore be carefully considered in this context.

Where a property is partly occupied and partly unoccupied, the council can request an apportioned rateable value from the VOA, provided that this situation exists for a short time only. Although this is not defined in law, it is generally accepted to mean less than one year but is for the council to determine on a case by case basis.

Favourable consideration will be given (but not limited to) where;

- There is a partial occupation of a warehouse, factory or commercial property to facilitate relocation of the company into the borough or to extend the current portfolio and associated occupation levels in the borough; or
- Where fire, flood or other disaster prevents full use of the property.

Favourable consideration would not normally be given (but not limited to);

- For a period that has now passed
- For consecutive periods
- To support a business moving its operation outside of the borough
- Where the owner sublets part of the property on a commercial basis
- Where there appears to be no effort to let, sell or occupy the empty part
- Where part occupation is seasonal or cyclical in nature.
- Where the unoccupied area is subject to maintenance, modernisation or other building works

At all times consideration will be made for the regulations contained within Section 44a of the Local Government Finance Act 1988 and any relevant caselaw.

How to apply

To apply, please provide a detailed explanation of the current situation, the reason why there is part occupation and the business plan to reoccupy the unoccupied portion.

You must also include a scale plan of the site, clearly showing the occupied and unoccupied portions, together with dated photographic evidence to show the unoccupied portion. You may also submit solicitor letters, estate agent records to help your application (list not exhaustive).

The council may want to also carry out an inspection to confirm the details of the application.

You can send applications by email to nondom.rates@rugby.gov.uk or to **Revenues Service, Town Hall, Rugby CV21 2RR**

Where further information is required, we will request this and allow a minimum of 21 days for it to be provided.

If this is not received, we will still consider the application but only on the basis of the information and evidence in our possession.

Period of relief

The effect of the apportioned values applies for the operative period, which is defined as the period beginning with the day on which the property became partly unoccupied and ending with the first day on which one or more of the following events occurs;

- The occupation of any of the unoccupied part of the property
- The ending of the financial year in which the apportionment was required
- The requiring of a further apportionment
- The complete occupation of the property; or
- The complete vacation of the property.

The council is required to terminate this relief in the event of a change in the proportions of the property occupied and unoccupied or at the end of a financial year, and then may, if appropriate, consider requesting the Valuation Office Agency to issue a further certificate.

The council would normally request a certificate for no more than 12 months, but this can be extended in exceptional circumstances.

Right of appeal

If you disagree with a decision made under this policy, you may write and tell us why you think our decision is wrong. If you are able to provide further information to address the reasons given as to why your application was unsuccessful, you may do so and we will reconsider our decision in the light of the new information.

If the Council's decision is still not to award relief, you may ask for a full review. The Chief Officer for Finance and Performance, who is not involved in the original decision, will check your application and supporting evidence thoroughly, taking into account any further information given in your appeal letter, then decide whether the policy have been properly applied in your case.

The Chief Officer has the authority to

- confirm the decision; or
- change the decision.

The Council will write to tell you what has happened, normally within 7 days of the decision.

As the decision to award a s44a relief is discretionary, any challenge relating to the councils decision would be in accordance with Section 138 of the Local Government Act 1988 by way of judicial review.

Subsidy Control

Please note that any award of discretionary rate relief must comply with the UKs Subsidy Control Act 2022 (replacing EU state aid)

Financial aid is allowed under the de minimis rules if the total amount of funding received by an organisation does not cumulatively exceed £315,000 over a three-year period.

Any assistance you have received, or are due to receive, from a public body may count as de minimis. This could be any aid, grant or support from central, regional or devolved governments, agencies, or a local authority.

AGENDA MANAGEMENT SHEET

Report Title: Calendar of Meetings 2025/26

Name of Committee: Cabinet

Date of Meeting: 4 March 2025

Report Director: Chief Officer - Legal and Governance

Portfolio: Finance and Performance, Legal and Governance

Ward Relevance: N/A

Prior Consultation: Leadership Team, other key officers involved in meetings

Contact Officer: Claire Waleczek, Democratic and Support Services Manager: claire.waleczek@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)
[Corporate Strategy 2021-2024](#)
 This report does not specifically relate to any Council priorities but should be considered by Cabinet for the following reason: Cabinet is required, under the Council's Constitution, to fix the dates and times of Council, Cabinet and committee meetings.

Summary: Cabinet is required, under the Council's Constitution, to fix the dates and times of Council, Cabinet and committee meetings each municipal

year. The proposed Calendar of Meetings for 2025/26 is attached at Appendix 1.

Financial Implications: There are no direct financial implications arising from the report.

Risk Management/Health and Safety Implications: There are no direct risk management implications arising from the report.

Environmental Implications: There are no direct environmental implications arising from the report.

Legal Implications: There are no direct legal implications arising from the report.

Equality and Diversity: There are no direct equality and diversity implications arising from the report.

Options: The Calendar of Meetings for 2025/26, as at Appendix 1 to the report, be approved.

Risks: Breach of Council's Constitution. No democratic process without a calendar of meetings.

Benefits: Compliance with the Council's Constitution.

Recommendation: The Calendar of Meetings for 2025/26, as at Appendix 1 to the report, be approved.

Reasons for Recommendation: In order to comply with the Council's Constitution.

Cabinet - 4 March 2025

Calendar of Meetings 2025/26

Public Report of the Chief Officer - Legal and Governance

Recommendation

The Calendar of Meetings for 2025/26, as at Appendix 1 to the report, be approved.

1. Executive summary

- 1.1 Cabinet is required, under the Council's Constitution, to fix the dates and times of Council, Cabinet and committee meetings.
- 1.2 The calendar of meetings set out at Appendix 1 takes into account the following requirements:
- five cycles of meetings per year
 - A minimum of five ordinary meetings of Full Council
 - A meeting of Audit and Ethics Committee to be held in September 2025 to consider the approval of the Statement of Accounts including the Annual Governance Statement
 - A meeting of Full Council to be held in February 2026 to consider the Budget Setting
 - Planning Committee to meet on a four-week cycle throughout the year
 - The Annual Meeting of Council to avoid the Annual Meeting of Warwickshire County Council
- 1.3 Appeals Committee, Grievance Committee and Shareholders Committee meets on an ad hoc basis.

2. Budget setting for 2026

- 2.1 In order to streamline the number of Council meetings during the year, it is proposed that the special meeting and ordinary meeting of Council held in February be combined to consider both the General Fund and HRA budgets for 2026/27 at the same meeting. This meeting would commence at 6.00pm.

3. School Holidays for Warwickshire, LGA Annual Conference and Political Parties' Conferences

Every effort has been made to avoid scheduling meetings during:

- dates of the LGA Annual Conference and Exhibition in Summer 2025;
- dates of the political parties' conferences in Autumn 2025; and
- school holidays for Warwickshire.

However, due to the volume of meetings to be incorporated in the calendar, it has not been possible to avoid these dates entirely.

Name of Meeting: Cabinet
Date of Meeting: 4 March 2025
Subject Matter: Calendar of Meetings 2025/26
Originating Department: Legal and Governance

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Calendar of Meetings 2025/26

Appendix 1

	May	19	Aug	4	Oct	20	Jan	5	Mar	23	NOTES
Mon											
Tue		20		5		21		6 Cabinet		24	
Wed		21 Planning		6		22 Council		7		25	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		22		7		23		8		26 Audit and Ethics	
Mon		26 Bank Holiday		11		27		12		30	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Tue		27		12		28		13		31	
Wed		28		13 Planning		29		14 Planning	Apr	1	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		29		14		30		15		2	
Mon	June	2 Cabinet		18	Nov	3		19		6 Bank Holiday	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Tue		3		19		4 Cabinet		20		7	
Wed		4		20		5 Planning		21		8	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		5		21		6		22 Scrutiny		9	
Mon		9		25 Bank Holiday		10		26		13 Cabinet	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Tue		10		26		11		27		14	
Wed		11 Council		27		12		28		15 Planning	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		12		28		13		29 Audit and Ethics		16	
Mon		16	Sep	1		17	Feb	2		20	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Tue		17		2		18		3 Cabinet		21	
Wed		18 Planning		3		19 Council		4		22 Council	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		19 Scrutiny		4		20 Scrutiny		5		23	
Mon		23		8		24		9		27	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Tue		24 Cabinet		9		25		10		28	
Wed		25		10 Planning		26		11 Planning		29	Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		26		11		27		12		30	
Mon		30		15 Cabinet	Dec	1 Cabinet		16			Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Tue	July	1		16		2		17			
Wed		2		17		3 Planning		18 Council			Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		3		18 Scrutiny		4		19			
Mon		7		22		8		23			Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Tue		8 Licensing		23		9		24 Licensing			
Wed		9 Council		24 Council		10 Council		25			Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		10		25 Audit and Ethics		11		26			
Mon		14	L	29		15	Mar	2			Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Tue		15	L	30		16		3 Cabinet			
Wed		16 Planning	L Oct	1		17		4			Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		17		2		18		5			
Mon		21	C	6		22		9			Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Tue		22	C	7 Cabinet		23		10			
Wed		23	C	8 Planning		24		11 Planning			Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		24 Audit and Ethics		9		25 Christmas Day		12			
Mon		28		13		29		16			Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Tue		29		14 Licensing		30		17			
Wed		30		15		31		18 Council			Meetings of Cabinet and committees commence at 6.00pm with the exception of meetings of Planning Committee which commence at 5.30pm.
Thu		31		16	Jan	1 New Year's Day		19 Scrutiny			

school holidays
Warwickshire

AGENDA MANAGEMENT SHEET

Report Title:	Proposed Housing Allocations Policy 2025
Name of Committee:	Cabinet
Date of Meeting:	4 March 2025
Report Director:	Chief Officer - Communities and Homes
Portfolio:	Communities and Homes, Regulation and Safety
Ward Relevance:	All
Prior Consultation:	Elected Members Consultation held on 22 January 2025
Contact Officer:	Dan Khan - Housing Advice and Benefits Team Manager (daniel.khan@rugby.gov.uk)
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	<p>This report relates to the following priority(ies):</p> <p><input checked="" type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives.</p> <p><input type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.</p> <p><input type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.</p> <p><input checked="" type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough.</p> <p>Corporate Strategy 2025-2035</p> <p><input type="checkbox"/> This report does not specifically relate to any Council priorities but</p>
Summary:	<p>The report proposes a Housing Allocations Policy for 2025.</p> <p>The proposed policy (appendix 1) is a statutory requirement; Local Housing Authorities are required to have a Housing Allocations Policy in accordance with the requirements of The Housing Act 1996 (Part VI) as amended.</p>

Proposed is the introduction of a choice based lettings (CBL) scheme for the allocation of Council and Registered Provider homes, enabling people to bid through the Council's Homechoice portal.

A summary of the main changes (appendix 2) provides an overview of the main changes from the previous policy of September 2024 [Housing Allocations Policy - Rugby Borough Council](#).

Financial Implications:

A Welfare Support IT reserve exists of £100k, which was initially set up in 2018/19 from new burdens funding to be used for specific IT improvements. There are no conditions to the use of this funding. The reserve is within the general fund and is not committed.

This fund will be used for the development of the IT system to enable the changes within this report and from the proposed housing allocation policy.

A continued resource for a consultant to implement CBL and the ongoing upkeep of the system once they have completed the task is likely to be required. Additional officer resources may also be needed for implementation of the IT system, transfer of data and system changes, this has not yet been fully costed as it is dependant on which changes are agreed within this policy.

The use of this fund is delegated to the Chief Officer, Communities and Homes to approve its spend.

Risk Management/Health and Safety Implications:

The proposed policy sets out in detail who is and who is not assisted under the policy and how this is decided. It also sets out how to apply for housing. This promotes transparency and fairness by which people are prioritised for social housing. The proposed housing allocations policy is designed to meet all legal requirements and to support and contribute towards the Council's wider objectives such as promoting mixed communities.

There is a risk that current information on the Council's properties held on the system may lack information, this will need rectifying to enable properties to be advertised. Meaningful reports will

be required to monitor allocations, nominations and housing need from the housing register/waiting list.

Environmental Implications:

Whilst there are no direct environmental implications arising from the proposed housing allocations policy. It is worth noting that good housing promotes good health. Preference has been given to people living in rented housing with poor energy performance ratings, contributing to high energy costs and disrepair. Homes that are overcrowded will be given preference reducing risks and improving living conditions.

Legal Implications:

The 1996 Housing Act (as amended by the 2002 Homelessness Act) requires Local Authorities to make all allocations and nominations in accordance with an allocation policy.

The Housing Act 1996, (as amended) requires Local Authorities to give 'Reasonable Preference' in their housing allocation policy to people with high levels of assessed housing need who are defined under the legislation. These are set out on page 6 of appendix 1 of the proposed housing allocation policy.

The Housing Act 1996 also requires Local Authorities to state within their allocation policy their position on offering applicants a choice of housing accommodation or offering them the opportunity to express a preference about the housing accommodation to be allocated to them. It is proposed that a Choice Based Lettings (CBL) system is introduced and the proposed allocations policy has been written with this in mind.

The Regulator of Social Housing also requires landlords; the Council, to deliver the outcomes of the tenancy standard which are to provide fair allocation and letting of homes and how tenancies are managed and ended by landlords.

Formally, any major change to the housing allocations policy can only be made after a copy of the proposed amendments have been consulted on by sending this policy to every Registered Provider operating in the Rugby area. This is a requirement under Section s166A (13) Housing Act 1996. This will be undertaken following Council approval.

Local government good practice guidelines have been followed for a broad consultation on the review of the proposed housing allocations including registered providers, elected members, members of the community and a leading consultant in housing and homelessness. The changes made as a result of this consultation are set out at Section 3 of this report.

Equality and Diversity:

An Equality Impact Assessment has been completed and forms appendix 4 to this report.

Options:

1. Adopt the Proposed Housing Allocation Policy and agree a new CBL system of housing allocations;
2. Reject the Proposed Housing Allocation Policy and new CBL system of housing allocations, and commission officers to present a revised version for consideration at a future meeting of Cabinet.

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT:

1. The proposed CBL Housing Allocation Policy 2025 (Appendix 1) be adopted;
2. Delegated authority be given to the Chief Officer (Communities and Homes) in consultation with the Portfolio Holder:
 - a. To review and revise the policy in response to:
 - i. any national policy or legislative changes;
 - ii. in response to any policy changes instigated by the Council;
 - iii. reflect the requirements of any new leading and relevant case law.
 - b. Report any significant changes to this policy to this Council's Cabinet.
 - c. To make minor changes to the policy in consultation with the Portfolio Holder responsible for the Housing Service.
 - d. To make changes to the operating procedures.

**Reasons for
Recommendation:**

The Council complies with the statutory requirement to have a Housing Allocations Policy in accordance with the requirements of The Housing Act 1996 (Part VI) as amended.

Cabinet - 4 March 2025

Proposed Housing Allocations Policy 2025

Public Report of the Chief Officer - Communities and Homes

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT:

1. the proposed CBL Housing Allocation Policy 2025 (Appendix 1) be adopted; and
2. delegated authority be given to the Chief Officer (Communities and Homes):
 - a. to review and revise the policy in response to:
 - i. any national policy or legislative changes;
 - ii. in response to any policy changes instigated by the Council;
 - iii. reflect the requirements of any new leading and relevant case law;
 - b. report any significant changes to this policy to this Council's Cabinet;
 - c. to make minor changes to the policy in consultation with the Portfolio Holder responsible for the Housing Service; and
 - d. to make changes to the operating procedures.

1 Executive Summary

- 1.1 All Local Housing Authorities are required to have a Housing Allocations Policy. Proposed in this report is the introduction of a choice based lettings (CBL) scheme for the allocation of Council and Registered Provider homes, in line with the housing allocation policy, enabling people to bid through the Council's Homechoice portal for the property they want to live in.
- 1.2 There has been stakeholder consultation on the proposals within this report with elected members and some key organisations and a statutory period of consultation with Registered Providers has been conducted.
- 1.3 Key policy changes proposed are a new band 4 which will enable people who do not have a urgent housing need to register for housing, which may not be in demand, and will help with finding occupiers for difficult to let properties as well as give people who are living with family or insecure accommodation with a low housing need the opportunity to bid for properties. A rural allocations

policy has been designed to logically prioritise applicants in descending order based on the 'strength' of their connection with the village or parish.

- 1.4 Appendices have been made available to show the current policy and the proposed housing allocations policy. A summary of the banding changes and rural allocations policy is attached and an Equalities Impact Assessment.

2 Introduction

- 2.1 In Rugby, the demand for social housing is greater than the number of homes available and a revised housing allocations policy is required to ensure those who are in most housing need are prioritised. Thresholds within the current criteria make it too difficult to apply and when people do, it's often when they are entering crisis point.
- 2.2 Approximately 85% of Councils operate a choice based lettings scheme (CBL) which enables people to choose and bid for properties where they wish to live. The Council and Registered Providers advertise their properties which are coming available or are void on a computer system. Usually it is a weekly or fortnightly bidding process.
- 2.3 Technology has moved on and our current system requires updating as it allows applicants applying for housing anywhere in the district, rather than limiting their choices just to a number of areas. The result of which is a housing register which does not show correct demand as applicants may have selected areas they do not wish to live in. This creates waste, and customer dissatisfaction through abortive offers when it is not an area they wish to live in. The customer then feels disengaged with the process. In addition having a housing register which shows where people are choosing and wishing to live will help the Council make investment decisions of where to build new homes and identify difficult to let stock which may no longer be required.
- 2.4 It is appreciated that not everyone will be able to use a computer or have access to one to make bids for properties within the new CBL system. Therefore good customer service interaction, such as through providing newsletters of properties coming available, coupled with help and support using computers will be available. There will be a customer satisfaction survey or mechanism in place to monitor how the policy is being implemented.
- 2.5 The proposed housing allocation policy and choice based lettings system seeks to deliver the Councils corporate aim to create 'A Fairer Rugby' to reduce inequalities and improve housing across the Borough through the opportunity of choice of where to live, creating much more balanced communities if people are connected with that area through children being in school, for example or family living there.
- 2.6 Not all vacant properties will be made available for bidding. Properties that meet specific requirements will be used to make direct offers to meet strategic, operational and financial requirements such as emergencies and decants. Properties subject to Local Lettings Plans and/or Rural Allocations Policy will be earmarked for applicants who satisfy the respective lettings

criteria and/or S106 obligations making best use of the available housing stock.

3 Stakeholder consultation

- 3.1 Consultation of the proposed housing allocations policy with Registered Providers has taken place and further engagement will be sought following approval at Cabinet and Council. Other key stakeholders who have been consulted have been elected members, members of the community and relevant organisations, as well as a leading consultant in housing allocations and homelessness.
- 3.2 The consultation with members in January 2025 highlighted the importance of ensuring that all applicants have a fair chance to access housing, particularly vulnerable groups, including individuals experiencing homelessness and those with complex needs.
- 3.3 The policy has therefore been designed to give additional preference to these groups. Feedback indicated a strong desire for the allocations policy to support the Council's commitment to addressing homelessness. Participants advocated for mechanisms that not only prioritise those currently homeless but also facilitate pathways to stable housing for individuals at risk of homelessness.
- 3.4 The consultation underscored the necessity of a transparent allocations process. Stakeholders expressed the need for clear communication regarding how decisions are made and the criteria used for allocations. This transparency is vital in building trust within the community and ensuring that residents feel informed and valued in the decision-making process.
- 3.5 In response to the feedback received, we propose to adopt a CBL model as the primary allocation method. This approach aligns with our commitment to fairness and transparency while empowering applicants to take an active role in selecting their housing options.

4 Why Choice Based Lettings ?

- Empowerment of Applicants: CBL allows individuals and families to express their preferences and make informed choices about their housing, enhancing their sense of agency and satisfaction with the process.
- Increased Transparency: By providing clear information about available properties and the selection process, CBL fosters transparency and enables applicants to understand their options and the criteria influencing allocations.
- Responsive to Local Needs: CBL can be tailored to reflect local housing demands and priorities, ensuring that the allocations process is responsive to the specific needs of Rugby's communities.

5 Amendments and Additions to the Council's Housing Allocation Policy

- 5.1 The current policy has been revised to introduce a new statement of choice providing applicants who wish to apply for housing the opportunity to choose where they live and to bid for properties they wish to live in. Properties will still be let to the household size and will not be under or over occupied.
- 5.2 The current policy allows people to request multiple areas which is distorting the housing register of where people need to live. Under the new policy if people do not bid and they are in housing need, bids can be placed by the Council on their behalf, this is called an autobid.
- 5.3 Exclusions from applying for social housing have been strengthened in the policy for unacceptable and antisocial behaviour.
- 5.4 Amendments to the proposed housing allocations policy are summarised in appendix 5.

6 Conclusion

- 6.1 The demand for social housing is greater than the number of homes available. This proposed allocations policy seeks to ensure those who are most need are prioritised for social rented housing and introduces a choice-based lettings system enabling applicants to be matched to Council and Registered Provider homes that they have bid for. This is supported by a housing options approach giving applicants realistic advice about the likely timescale of availability of a social rented home, whilst promoting other housing options, to help prevent housing issues escalating into crisis and the use of statutory homeless services.

The changes to the allocation policy will enhance fairness through choice-based letting, ensuring that residents have a greater say in housing decisions. It will also help ensure the number of reapplications made are reduced and the council is building more secure sustainable communities.

The housing team will conduct annual reviews to assess the policy's impact on fairness and efficiency, allowing for ongoing improvements and adjustments based on feedback and outcomes. This approach aims to create a more equitable system that reflects the preferences and needs of the community.

Name of Meeting: Cabinet
Date of Meeting: 3 March 2025
Subject Matter: Proposed Housing Allocations Policy 2025
Originating Department: Communities and Homes

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

CBL Final Draft: Rugby Borough Councils' Housing Allocation Policy

October 2024

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Version Control and Revision History

Version	Date	Author	Details
1.0: This Revised Adopted Policy	Add date of Cabinet approval	Add decision author	Details are the revised policy as adopted
2.0:			

Section 1: Introduction to the Housing Allocation Policy

1.0 Introduction

This document is the revised Housing Allocation Policy for Rugby Borough Council.

Local Housing Authorities are required to have a Housing Allocations Policy in accordance with the requirements of The Housing Act 1996 (Part VI) as amended. The Allocations Policy determines priorities and defines the procedures to be followed in allocating social housing.

In Rugby, the demand for social housing is greater than the number of homes available. The Allocations Policy sets out in detail who is and who is not eligible for housing, who is qualified to join the housing register and how this assessment is made.

The Council's Allocation Policy sets out in detail who is and who is not assisted under the Policy and how this is decided. It also sets out how to apply for housing. The Policy is designed to meet all legal requirements and to support and contribute towards the Council's wider objectives such as promoting mixed communities.

Most social housing vacancies in Rugby will be allocated through a choice-based lettings system matching applicants to available Council and Private Registered Provider homes that they have bid for. The system will be supported by a housing options approach giving applicants realistic advice and promoting other housing options, such as low-cost home ownership options and private sector renting.

The key objectives of this Allocation Policy are to:

- Meet the legal requirements placed on the Council to give appropriate priority to applicants who fall under the Housing Act "reasonable preference groups". This is to ensure that social rented housing is let to those in greatest need
- Provide a fair and transparent system by which people are prioritised for social housing
- To comply with The Tenancy Standard by providing a fair and transparent system which takes the needs of tenants and prospective tenants into consideration.
- Promote the development of sustainable mixed communities.
- Make efficient use of our resources and those of the private registered providers with social housing stock in the Rugby area.

1.1 Legal context

Rugby Borough Council's Allocation Policy sits within a legal framework that is summarised in this section.

The 1996 Housing Act (as amended by the 2002 Homelessness Act) requires Local Authorities to make all allocations and nominations in accordance with an Allocation Policy. A summary of the Allocation Policy must be published and made available free of charge to any person who asks for a copy. This document is available on the Council's web site: https://www.rugby.gov.uk/downloads/download/151/housing_allocations_policy?oldUrl=/downloads/file/1092/housing_allocations_policy

The Housing Act 1996, (as amended) requires Local Authorities to give 'Reasonable Preference' in their Allocation Policy to people with high levels of assessed housing need who are defined under the legislation as:

- All homeless people as defined in Part VII of the Housing Act 1996
- People who are owed a specific homeless duty under Sections 189B, 190 (2), 193 (2), or 195 of the Housing Act 1996 (or under Sections 65 (2) or 68(2) of the Housing Act 1985)
- People occupying insanitary, overcrowded or otherwise unsatisfactory housing
- People who need to move on medical or welfare grounds (including grounds relating to a disability)
- People who need to move to a particular locality within the district to avoid hardship to themselves or others

For applicants owed a reasonable preference, additional preference must be granted in the following circumstances:

- People serving in the armed forces and suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service
- People who have recently ceased, or will cease to be entitled, to reside in accommodation provided by the Ministry of Defence following the death of that person's spouse or civil partner who has served in the armed forces and whose death was attributable (wholly or partly) to that service; or
- People serving or have served in the reserve forces and are suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service.

The Housing Act 1996 also requires Local Authorities to state within their Allocation Policy their position on offering applicants a choice of housing accommodation or offering them the opportunity to express a preference about the housing accommodation to be allocated to them. We have adopted a Choice Based Letting system and our policy on choice is described in section 1.7 of this policy.

In developing the policy, regard has been had to the law and regulatory requirements, including:

- The Housing Act 1996, Part 6 as amended by Localism Act 2011 (England)
- The Housing Act 1996, Part 7 as amended by the Homelessness Reduction Act 2017
- Allocation of Accommodation: Guidance for Local housing Authorities in England (2012, DCLG) "the Code"
- Providing Social Housing for Local People: Statutory Guidance on Social Housing Allocations for Local Authorities in England (DCLG, December 2013) "Supplementary Code"
- Allocation of Housing (Procedure) Regulations 1997, SI 1997/483 Allocation of Housing (England) Regulations 2002, SI 2002/3264
- Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006, SI 2006/1294 and all subsequent amendments

- Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012, SI 2012/1869
- Housing Act 1996 (Additional Preference for Armed Forces) (England) Regulations 2012, SI 2012/2989
- The Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015
- The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) (EU Exit) Regulations 2019 (SI 2019/861)
- Equality Act 2010
- Data Protection Act 2018
- UK-GDPR (General Data Protection Regulation) 2021
- Care Act 2014
- Human Rights Act 1998
- Domestic Abuse Act 2021; and
- Children and Social Work Act 2017

In framing the Allocation Policy, regard has also been had to the current Rugby Borough Council Housing Strategy 2022-24 and the Homelessness and Rough Sleeping Strategy, the Tenancy Strategy (Warwickshire wide) 2015, and relevant caselaw.

All references to statutory materials are by way of summary and are not used as substitutes for the details within the original.

The Council will provide an electronic copy of this Policy to anyone who asks for one. Copies in alternative formats will be considered on an individual basis. The whole of this Policy is available for inspection by any person at the Town Hall of the Council if someone is unable to access the Policy online.

Any provision in this Policy may be waived in exceptional circumstances at the discretion of the Housing Advice and Benefits Team Manager or Chief Officer (or their delegate) responsible for the housing services. The reasons why a provision has been waived will be documented.

This is the revised Housing Allocation Policy for Rugby Borough Council and will take effect on or after *insert date here when the Policy has been approved by the Council and an implementation date once it has been agreed what that date will be*. The assessment of need and qualifying criteria set out in the Policy will be applied to all new and existing applicants from this date.

The following types of allocation are not covered by this Policy:

- a) Tenancy successions
- b) Tenancy assignments, such as mutual exchanges
- c) Tenancy status changes, such as introductory to secure tenancies
- d) Tenancy transfers pursuant to Court Orders
- e) Management Allocations, such as:
 - Joint to sole or sole to joint tenancies
 - Temporary lettings to existing Council tenants who need to be decanted pending major refurbishment or repair works

- Temporary lettings to homeless households
- Where there is a legal requirement to offer accommodation to a household following a compulsory purchase of a property
- Where there is a legal requirement to offer accommodation to a displaced agricultural worker under the Rent (Agriculture) Act 1976.

Allocations to the following types of accommodation are also not covered by this Policy:

- a) Supported Housing schemes (applicants for this type of accommodation will be signposted or referred to Adult Social Care/the relevant Supported Accommodation Provider)
- b) Extra Care Housing schemes (applicants for this type of accommodation will be signposted or referred to Adult Social Care/the relevant Extra Care Accommodation Provider)
- c) Affordable Home Ownership schemes (applicants for this type of accommodation will be signposted or referred to the local Help to Buy Agent).

1.2 Making changes to the Policy

The Policy will be reviewed and revised as required:

- in response to any national policy or legislative changes; or
- in response to any policy changes instigated by the Council; or
- to reflect the requirements of any new leading and relevant case law.

Any significant changes to this Policy will be approved by the Council's Cabinet.

For minor changes to the Policy decisions will be delegated to the Portfolio Holder responsible for the Housing Service.

For changes to the operating procedures decisions will be delegated to the Chief Officer for the Communities and Homes Service.

Formally, any major change to the Policy can only be made after a copy of the proposed amendments have been consulted on by sending this Policy to every Registered Provider operating in the Rugby area. This is a requirement under Section s166A (13) Housing Act 1996.

The Council will take any steps as it considers reasonable (for example, by making contact via email, telephone, or letter, or by placing a notification on the Council's website, or via another suitable form of communication), within a reasonable period of time, to bring to the attention of applicants likely to be affected by:

- a) Any alterations made to this Policy
- b) Any subsequent alteration to this Policy that would affect the relative priority of a large number of applicants; or
- c) Any significant alteration to any associated procedures for administering this Policy.

Where a full review of the Policy is undertaken, the Council will normally adopt local government good practice guidelines and undertake a broad consultation that includes relevant statutory and voluntary sector organisations, tenant representatives, and applicants to the Policy.

1.3 Data Protection

Rugby Borough Council will ensure personal information of all applicants (new, existing, and deleted) is:

- a) Stored lawfully
- b) Processed in a fair and transparent manner
- c) Collected for a specific, explicit and legitimate purpose
- d) Kept up to date and held until it is no longer required; and
- e) Shared only with other organisations for legitimate processing.

Rugby Borough Council's privacy notice, which sets out when and why it collects personal information about people who access its services, how it uses it, how it keeps it secure, and individuals' rights, can be found on its website: <https://www.rugby.gov.uk/privacy>

The UK-GDPR and the Data Protection Act 2018 provide individuals with a right to request access to any of their personal data held by Rugby Borough Council, and a right to know where the data came from, how it is used, and why it is held. Such a request is called a "subject access request" and applies to personal data in housing files. Information about making a subject access request is available on the Council's website:

<https://www.rugby.gov.uk/info/20030/information-and-data/110/requesting-personal-information#:~:text=You%20can%20make%20a%20request,you%20to%20provide%20more%20detail.>

Subject Access Requests can be made in writing to Rugby Borough Council at the Town Hall, Evreux Way, Rugby CV21 2RR.

1.4 Right to Information

Anyone has the right to request access to recorded information held by the Council under the Freedom of Information Act 2000 (FOIA).

Requests under the FOIA must be made in writing, must include the applicant's name and a correspondence address, and must specifically describe the information requested.

Requests can be made via our website <https://www.rugby.gov.uk/w/freedom-of-information#making-a-request> or by writing to Rugby Borough Council at the Town Hall, Evreux Way, Rugby CV21 2RR.

1.5 Equality, Accessibility, and Monitoring

Rugby Borough Council is committed to ensuring that the Policy, and the implementation of all associated guidance and procedures, are non-discriminatory, taking into account the

needs of groups protected by the Equality Act 2010, the Human Rights Act 1998, and for children, Section 11 of the Children Act.

Rugby Borough Council will ensure this Policy complies with current equality legislation. It has been subject to a full Equality Impact Assessment (EIA) before it was adopted. The EIA will be regularly reviewed as information regarding the impact of the Policy is obtained. A copy can be requested directly from the council.

1.6 Complaints

Complaints are separate to the circumstances in which an applicant is entitled to seek a review of a decision made on their housing application. A request for a review of a decision made on an application should be made under the review procedure set out in section 3.13 and not through the Council's complaints processes.

Where an applicant wishes to make a complaint about poor service, or the way they have been treated, this should be made using Rugby Borough Council's complaints process. Information about how the Council deals with complaints can be found on its website: <https://www.rugby.gov.uk/a-to-z/service/30/complaints>

Where a complaint relates to how an applicant has been dealt with under this Policy, an applicant has the right to continue with their complaint to the Local Government and Social Care Ombudsman Service if they are unhappy with the Council's response to their complaint. Further information can be found on the LGSCO's website: www.lgo.org.uk

1.7 The Council's statement on choice

The Council will let the majority of properties through a system called 'choice-based lettings' (CBL) but not all properties, (see below for when the Council may make a direct offer outside of the CBL system). This means the majority of properties will be advertised and applicants will be able to 'bid' on properties that suit their needs.

Applicants who are eligible to be considered for properties under the Policy will be able to express a preference for an area, or areas, in which they would like to live and the type of property they would prefer. However, the ability to satisfy their preferences is limited by the amount of housing available in Rugby.

The housing pressures faced in Rugby limit the degree of choice that can be offered, along with the responsibility the Council has to offer housing to applicants in urgent housing need. These pressures include the need to reduce the financial impact on the Council for households placed into temporary accommodation under a homelessness duty.

Therefore, expressing a preference over where an applicant would prefer to live does not mean that preference can be met, or that an applicant won't be offered suitable accommodation outside of their preferred area.

An applicant will be asked at time of registration to state any area in which they believe they cannot live due to fear of violence, harassment, or domestic abuse. The assessment of their application will then consider the facts and decide whether the applicant is allowed to restrict areas. For applicants who have been a victim of domestic abuse or other violence

who wish to be rehoused in an area where that abuse or violence has occurred the Council will consider on the facts and circumstances of the case to determine whether an offer can be made, or whether the risk is so significant that an offer cannot be considered despite the applicant's wishes. The definition of domestic abuse used to assess applicants under the policy is the definition set by the Domestic Abuse Act 2021 which includes both physical and non-physical forms of domestic abuse.

Priority for Council and Registered Provider (Housing Association) properties being let as secure, flexible, or assured tenancies will be determined by housing band, with those applicants in Band 1 having a greater priority than those in Bands 2 or 3 or 4 and those in Band 2 having a greater priority than those in Band 3 or 4. Within bands, priority will normally be determined by the date the applicant has been registered in that band.

In selecting properties to allocate the Council will normally take into account the following factors:

- The number of bedrooms required
- Any essential requirement concerning the type or location of housing
- The housing band into which the applicant's case falls; and
- The date registered within that band (except for when a property may be allocated outside of band or outside of date order within a band (see section 1.8 below))

The Council will not normally take into account:

- Non-essential preferences concerning the location or type of rehousing requested by the applicant; or
- An applicant's preference concerning an allocation of a Council property, or a nomination to a Housing Association property.

1.8 When the Council may choose to make a direct offer outside of the bidding (CBL) system and sometimes outside of the band and date order system

There will be circumstances in which there are urgent strategic, operational, or financial reasons to make a direct offer outside of the bidding system and/or outside of the normal band and date order criteria. Specific examples include but are not limited to:

- a) People who need to move due to a fire or flood, or severe storm damage to their home
- b) Where there is an evidenced threat to life in the area in which an applicant currently lives for example, people who are at imminent risk of violence and are to be housed through a credible risk of violence
- c) People who it has been agreed must be housed urgently as part of a multi-agency protocol such as a MAPPA, or MARAC
- d) Where a vacant adapted property or a property designed to disability standards becomes available it may be offered to those households with a need for this property type regardless of their band or the date they were registered

- e) In the case of a Council tenant who is willing to transfer from a property they do not require, and which is particularly suitable for an applicant with special or support needs
- f) Applicants who have voluntarily given up their secure or flexible council tenancy whilst they are in prison through an agreement with the Council to rehouse them on release from prison
- g) Where an applicant is homeless and in temporary accommodation and owed a Section 189B (2) Relief duty or 193(2) Main duty under the Housing Act 1996 and the Council wishes to make an offer outside of the band or date in band system in order to manage any budgetary or legal requirements placed on the Council
- h) Persons whom the Council has a duty to rehouse under Section 39 of the Land Compensation Act 1973
- i) A vulnerable applicant where the outcome of an assessment is that a managed letting to a property in a particular suitable location is the best letting solution for that applicant
- j) Where an applicant has a specialist need for adapted accommodation and the availability of suitable accommodation is limited
- k) Where an applicant poses a risk to individuals or the community
- l) Where a property has been temporarily let to a homeless applicant and is offered to the applicant in order to discharge the Main Housing Duty under Section 193(2) of the Housing Act 1996 or the Accommodation Duty under Section 193C(4) of the Housing Act 1996
- m) Where a property that has been advertised, offered to and refused by another applicant and is ready to let, the Council can offer this property to a homeless applicant who has a higher banding or banding effective date than the remaining applicants on the bidding shortlist
- n) Where a property that has been advertised, offered to and refused by all applicants on the bidding shortlist is offered to a homeless applicant and refused the Council can readvertise the property or use it for a direct match
- o) Where the Council decides that an allocation would be in the Council's financial interest and reduce expenditure on temporary accommodation
- p) Where the Council decides that an allocation would make the best use of available social housing stock.

Special allocation arrangements may also apply in respect of properties available for letting on new-build developments.

In all of these examples a direct allocation may be made. There is no minimum time that an applicant will be allowed to bid before they can be considered for a direct offer. For

example, even though an applicant owed a homeless duty and in temporary accommodation will be allowed to bid under the CBL system they may still receive a direct offer at any time in order to reduce the financial impact on the Council of temporary accommodation.

Decisions to allocate properties outside of the bidding system, including outside of the band and date in band system, will be authorised by the Waiting List Team Supervisor or Team Leader responsible for applications and lettings service and recorded with the reasons why an allocation has been made. These will be reported to Council elected members at least annually through a performance report covering all applications and lettings.

Note: households that may be at high risk due to significant repairs issues will be decanted and made a direct offer outside of this Allocation Policy as any offer will be a management initiated move and these sit outside of the requirements of allocations legislation.

1.9a Low demand properties

If a property is advertised through the Council's Choice Based Lettings cycle at least twice and has not been allocated by any form of allocation method, the Council reserves the right to determine the most appropriate method of re-advertisement.

For low demand properties, providing an applicant is both eligible and qualifies in terms of acceptable behaviour, the Council reserves the right to advertise and/or allocate outside of the normal rules of the scheme

1.9 Removal from the Housing Register where an applicant refuses two reasonable offers

An applicant who bids successfully under the CBL system but subsequently fail to attend an appointment to view or refuses an offer of a tenancy without good cause (including where a direct offer has been made), increase administration time and cost and more importantly are denying other applicants the opportunity to be shortlisted for properties.

An applicant may withdraw their bid for a property without penalty at any stage of the bidding process up to the close of the bidding round. This does not include applicants where the Council has decided to place bids for the applicant (see Assisted Bidding 4.7) However, if an applicant is the successful bidder on a property but either fails to attend a viewing appointment or refuses the offer of a tenancy without good reason, this will count as a reasonable offer refused.

Any applicant who refuses two reasonable offers will be removed from the Housing Register for a period of 12 months except where there has been a material change in circumstances during the 12-month period such that the two offers of accommodation would no longer be reasonable. The 12-month exclusion shall be from the date the Council notified the applicant of its decision. An example of a material change in circumstances could be because of a significant deterioration in health where an applicant's current housing has had a substantial impact on the deterioration of their condition and neither of the two offers refused would now be reasonable.

The Council will determine whether an offer was reasonable for an applicant to accept using the reasonable offer criteria set out at appendix 5.2.

Applicants owed any of the statutory homeless duties will be made one reasonable offer in writing and a refusal will mean that their banding priority for being owed a statutory homeless duty will be removed.

A reasonable offer of accommodation for an applicant owed a statutory homeless duty could be either a private rented property, or a social rented property. Should the applicant refuse an offer that is considered reasonable and suitable for their needs as defined under homelessness regulations, then, subject to the Council's homelessness review procedure, the homelessness duty owed will be discharged and they will lose any priority banding granted to them based on the homelessness duty owed.

In these circumstances the Council will then assess whether they have another housing need as defined by this Policy that would still allow them to be banded and owed a second suitable offer under the Policy. If they do not, they will be removed from the Housing Register under the 'no housing need' qualification rule.

A statutory homeless duty is defined as:

- The prevention of homelessness duty under Section 195(2)
- The 'relief of homelessness duty' under Section 189B(2)
- Where the relief duty has come to an end and an applicant is then owed a Section 190 Intentionally homeless temporary accommodation duty to provide them with a reasonable opportunity to secure alternative accommodation for occupation (Section 190(2) duty); or
- The Section 193(2) main homelessness duty or the Section 193C(4) 'reduced' Section 193 duty.

The suitability criteria used to determine whether an offer to end a main homeless duty owed under Section 193(2) of the Housing Act 1996 or a relief of homelessness duty owed under Section 189b, will be the criteria set down in the Suitability of Accommodation Order England 2012, as amended by Section 12 of the Homelessness Reduction Act 2017, relevant case law, and statutory guidance.

These criteria only apply to an offer of social housing or private rented housing made with the intention of ending a main or relief homelessness duty. Where an offer is made to any other banded applicant who is not owed the main or relief homeless duty, it is for the Council to decide based on the facts of the case whether the offer is reasonable using the guidance in Appendix two of this Policy to help make the decision.

If an applicant does not reply to an offer within two working days of receiving the offer it will be deemed to have been refused unless there are exceptional circumstances as to why there has been no response.

1.10 Contacting the Council

You can contact Rugby Borough Council to ask about any aspect of this policy or your application by writing to:
Rugby Borough Council
Town Hall

Evreux Way Rugby CV21 2RR - Or by telephoning: 01788 533533

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Section 2: Applying to join the Housing Register: Eligibility and the qualification and disqualification rules adopted by the Council

Anyone over the age of 16 years can apply to join the Housing Register. Applications will be rejected if:

- a) They are ineligible to be considered by law; or
- b) They come within one of the 'non qualification' categories set out in the Policy which includes if they do not have a statutory housing need.

A person can apply to join the Housing Register if their current address is their only home, or sole residence. An applicant cannot be registered on two applications at the same time.

If an applicant is under 18 years of age, they will not normally be offered a property. We work closely with Doorway and P3 to source the most appropriate tenure for young people aged under 18 including the House Project.

If in exceptional circumstances a person who is 16 or 17 is granted a tenancy, this will normally be held in trust until they reach the age of 18. This means that another suitable person (such as a parent, legal guardian, or relative) will normally be responsible for the tenancy.

In order to qualify to be included on the housing register applicants should have mental capacity to understand the implications and responsibilities of being a tenant. An application may be made on behalf of a person who lacks mental capacity by any persons holding a Lasting Power of Attorney (property and finance) or a Court Appointed Deputy which may then be considered by the social housing provider, whose decision will be final.

2.1 The eligibility rules

Some groups of people cannot by law join the Housing Register regardless of their housing need or circumstances. These are people who:

- Come under the legal rules set by the Government setting out who cannot lawfully access social housing
- Do not live habitually in the 'Common Travel Area' (UK, Channel Islands, the Isle of Man or the Republic of Ireland)
- Do not have the right to live in the UK; or

The key relevant regulations that apply to eligibility are:

- Regulations 3 and 4 Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006, SI 2006/1294
- All subsequent amendments including 'The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) (EU Exit) Regulations 2019 (SI 2019/861)

- The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) Regulations 2020 (SI 2020/667) implemented from the 24 August 2020.

The above is not a complete list of all the eligibility regulations. For example, there is significant legislation that relates to the UK's exit from the European Union and the implications for accessing housing assistance. These rules are complicated. Anyone who is impacted, or believes they may be impacted, can approach the Council for advice, or can seek independent legal advice.

Further detail on the eligibility rules are set out in Appendix 5. A member of the Housing Advice and Benefits Team will determine the eligibility of an applicant to join the housing register.

2.2 The non-qualification rules adopted by the Council

Under Section 160ZA(7) of the Housing Act 1996 Part 6 a Council is allowed to set criteria for classes of persons who are, or are not, qualifying persons. The following classes of person will not qualify for the Housing Register unless the Council agree there are exceptional circumstances for waiving a rule.

- 1) Applicants without a local connection to the Rugby Borough area (unless they meet one of the exceptions rules set out below or discretion has been applied for exceptional circumstances)
- 2) Applicants who do not have a housing need as defined under the banding criteria set out in this Policy and are not one of the exceptions listed
- 3) Applicants whose unacceptable behaviour is assessed as serious enough to make them unsuitable to be a tenant
- 4) Applicants assessed as having sufficient financial resources as defined by the policy
- 5) Applicants who own a home
- 6) Applicants with lawfully recoverable arrears or another housing related debt owed to a social landlord or private sector landlord which have been accrued through deliberate and wilful non-payment
- 7) Applicants seeking to obtain accommodation by making a false or misleading statement or by withholding relevant information, or by failing to inform the Council of any material change in circumstances
- 8) New introductory tenants (Council) and starter tenants (Housing Associations) will not be permitted to apply for a period of 12 months unless there are overriding management reasons which have been agreed by the Waiting List Team Supervisor or Team Leader
- 9) Applicants who have refused two offers of social housing within one year, which are assessed as suitable offers, will be removed from the register for a period of 12 months
- 10) Where there are exceptions to these rules these are set out in the relevant section below. There is a discretion to waive a rule in exceptional circumstances, as approved by the Housing Advice and Benefits Team Manager or an equivalent senior service manager responsible for housing in Rugby.

(see section 2.4 for details for how the Council will consider exercising discretion).

2.3 Further details on how applications will be assessed under the non-qualification rules adopted by the Council

Non-qualification rule 1: The need to demonstrate a local connection

To establish a 'Local Connection' with the Rugby Borough an Applicant or joint Applicant must (with certain exceptions as set out below) meet at least one of the following criteria:-

- a) Currently live, or have lived, within the borough of Rugby and have done for at least 6 out of the last 12 months or 3 out of the last 5 years; or
- b) The applicant or their partner are employed in permanent employment in the Rugby Borough area for at least 12 months. Employment is defined as a permanent contract for paid employment for at least 16 hours or more per week and is not work that is considered to be temporary, casual or seasonal. Where there is a 'zero-hours' permanent contract the assessment will consider if, on average over a 3-month period, the person is working for 16 hours a week or more and that zero hours contract is not a temporary contract. If an applicant has no other local connection for the residence or family rule then the applicant or partner must be working at the point any offer of a tenancy is made.

Where an applicant or partner is self-employed they must demonstrate that the self-employed work they perform is:

- In carried out in the geographical area of Rugby Borough and
- Cannot be performed from home, and
- They have been self-employed for a continual period of at least 6 months and
- Their self-employment is not work that is considered to be temporary or seasonal.
- In addition the applicant or partner must be working in a self-employed capacity at the point an offer of a tenancy is made.

- c) Or, have close family (normally considered to be a mother, father, brother, sister, or adult son or daughter) that have lived in the district for a minimum of the last 5 years

Households placed in accommodation outside of the Borough by the Council in meeting its statutory duties will retain their local connection.

Once registered, an applicant must continue to meet the local connection qualification rule. If the applicant no longer meets this rule, they will be removed from the Housing Register as they will no longer qualify for inclusion.

People in the following categories will not normally be considered as having a local connection:

- a) Persons who have been detained in the Local Authority area (e.g., in prison, or Approved Premises,) will not be able to establish a local connection as this does not constitute being resident in the Rugby area by choice.
- b) Applicants who meet the reasonable preference criteria as set out in the Housing Act 1996 section 167 (2) but have no local connection will be placed in band 3.
- c) Persons placed in supported accommodation in the Rugby borough will not meet the local connection criteria by virtue of residency in the area unless there are exceptional circumstances.

For the purposes of determining a connection for residence, the Council will accept the following circumstances as demonstrating 'normal residence':

- Residency in a non-traditional dwelling, such as a mobile home that is placed on a residential site, or an official pitch
- People who are verified rough sleepers in the Rugby area as long as overall there is evidence that they meet the 6-month period for residency.

There are several exceptions to the local connection rule. These are:

1. Where the Council agrees there are very exceptional circumstances requiring a move into the Rugby area. This will be decided on a case-by-case basis. Examples where exceptional circumstances may be considered on a case-by-case basis include:
 - Reasons of safety, for example when an applicant is fleeing domestic abuse or hate crime from another area; or
 - An applicant is on a witness protection program and the Council has agreed that a move to Rugby is essential; or
 - Where the Council agrees there is a very exceptional need to live in the Rugby area to provide or receive essential support.
2. An application from a Gypsy or Traveller household where the applicant may not fully meet the 6-months continuous period of residence rule, if that period has been broken by travelling.
3. A young person owed leaving care duties under Section 23C of the Children's Act 1989, looked after by Warwickshire County Council will be considered to have automatically established a local connection to Rugby until they reach the age of 21 (when this duty will cease, or 25 if they are pursuing a program of education agreed in their pathway plan).
4. A young person who has been provided with accommodation under Section 22A of the Children Act 1989 (provision of accommodation for children in care) who has resided in Rugby for a continuous period of at least 12 months will be considered to have established a local connection to Rugby even if some of that period accrued before that person turned 16 years old.
5. Applicants who satisfy the 'Right to Move' criteria. The Allocation of Housing (Qualification Criteria for Right to Move) Regulations 2015 state that local connection qualification rules must not be applied to existing social tenants who seek to move from another Council district in England, and who have a need to move for work related reasons to avoid hardship. However, under this Allocation Policy, Rugby Borough Council will limit these moves to no more than 1% of all lettings per year.

See appendix 4 for details of how the 'Right to Move' criteria will be applied.

6. Where, at the date of application, the applicant is not currently resident in Rugby whilst:

- a) Receiving medical or respite care, or
- b) Serving a custodial sentence and is imminently due to be released, or
- c) In another type of institution e.g. mental health, refuge, rehabilitation

In these circumstances the applicant must have been living in Rugby for at least 6 months prior to their current circumstances.

7. Applicants who satisfy the Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012. These are:
- a) Applicants who are serving members of the regular armed forces
 - b) Applicants who served in the regular armed forces within the 5 years immediately prior to the date of their application
 - c) Applicants who are serving or former serving members of the regular armed forces or reserve forces who suffer from a serious injury, illness or disability sustained as a result of their service
 - d) Applicants who are a bereaved spouse/civil partner of a former serving member of the regular armed forces and have recently ceased (or will soon cease) to be entitled to reside in services accommodation following the death of their spouse/civil partner; or
 - e) The divorced or separated ex-spouse of a member of HM Armed Forces, who is currently serving or going through resettlement.

Non-qualification rule 2: Housing need

Applicants who do not meet the housing need criteria for an award of a band 1-4 will not be admitted to the Housing Register unless they come under one of the following two exception groups:

- 1) Applicants over the age of 55 without an assessed housing need and who are not homeowners and are prepared to accept designated older person's housing only. This exception is because there is evidence that a number of older applicants are able to receive an offer of older person housing or age restricted housing as there is a greater availability for this type of housing in Rugby. Note applicants who qualify under this exemption will only be considered for age restricted properties and cannot be considered for general needs properties.

For homeowners there are some limited exceptions where an applicant who is 55 or over and a homeowner may be allowed to qualify for the housing register (see non qualification rule 5 below).

Non-qualification rule 3: Unacceptable behaviour

The non-qualification rule for unacceptable behaviour will apply where an applicant, or any member of their household, has demonstrated serious unacceptable behaviour that, in the view of the Council, makes them at the time of their application, or since their application, unsuitable to be a tenant.

The unacceptable behaviour disqualification rule will also apply to applicants currently on the Housing Register. An applicant's eligibility to remain on the Housing Register will be kept under review and an applicant may be rendered ineligible should the council be satisfied that the rule relating to unacceptable behaviour should be applied to their case.

Examples of unacceptable behaviour that may result in a decision that an applicant will not qualify to join the housing register include:

- a) They or a member of their household has committed anti-social behaviour in or around the vicinity of their home that has resulted in an CPNS, CPNW or similar legal deterrent being issued within the past five years or on the test of 'the balance of probabilities' the Council is satisfied that the behaviour took place.
- b) They or a member of their household have a conviction for using their accommodation, or allowing it to be used, for illegal or immoral purposes such as drug dealing, within the past five years.
- c) They have been evicted from a tenancy by a social or private landlord for a breach of tenancy conditions, including non-payment of rent, within the past five years.
- d) Committing acts causing or likely to cause nuisance or annoyance to neighbours or others in the area where they live or have previously lived in the last 5 years.
- e) Conduct likely to cause nuisance or annoyance if they were to be offered a tenancy. This is conduct or behaviour that does not only relate to a previous social housing or private rented sector tenancy. It may include the circumstances where an applicant, or a member of their current or prospective household, is the subject of actions being taken by any Council (or some other recognised body) on grounds of alleged antisocial behaviour (ASB).
- f) Circumstances where the applicant, or any member of their household, has assaulted/ or threatened a member of the Council's staff, whether or not an injunction is being sought, or has been obtained.
- g) Being subject to a court order (including an interim order) for breach of tenancy conditions.
- h) Being violent towards a partner or members of the family.
- i) Allowing the condition of the property to deteriorate in avoidable circumstances.
- j) Paying money illegally to obtain a tenancy.
- k) Unlawfully subletting a Social Housing tenancy.
- l) Applicants who have been convicted of housing or welfare benefit related fraud, where that conviction is unspent under the Rehabilitation Offenders Act 1974.
- m) Having unspent convictions where an assessment by the Council concludes that the applicant is unsuitable to be a tenant due to a significant risk to potential neighbours and/or communities such as convictions for selling drugs.
- n) An applicant or any member of their household has been responsible for any racial harassment or other hate crime. 'Racial harassment' and 'hate crimes' are defined as racist, religiously aggravated, faith, gender, disability, and trans phobic or homophobic or gender re-assignment harassment or hate crimes. A hate crime or racist incident is defined as any incident which is perceived to be racist or hate crime related by the complainant or any other person.

The assessing officer will be guided by the following framework when assessing whether an applicant should not qualify based on their unacceptable behaviour:

- a) The behaviour need not have led to possession, prosecution, or other enforcement action by a statutory agency if they had been a tenant, provided that, on the balance of probability, the household is responsible.
- b) In normal circumstances the behaviour concerned should have occurred within the last five years. In cases of a more serious nature, for example, those involving criminal prosecution, a longer timescale may be appropriate if the applicant still poses a threat to neighbours and community.
- c) There must be reasonable grounds for believing that the behaviour could continue or be repeated. For example, the applicant may have issued threats, or there might be a history of repeat offending.

When assessing whether behaviour may result in the applicant not qualifying the assessing officer will be guided by the following framework. They will consider:

- 1) The seriousness of the applicant's behaviour.
- 2) The duration of the behaviour and/or the number and frequency of incidents.
- 3) The length of time that has elapsed since the behaviour took place.
- 4) Any relevant vulnerability or support needs that may explain the behaviour.
- 5) Whether there is meaningful engagement with support agencies.
- 6) Critically, whether there has been a significant and sustained change in the applicant's behaviour.
- 7) Whether they believe on the evidence that the behaviour is likely to still reoccur now or at the point a tenancy was offered or commenced.
- 8) Whether the circumstances that caused the behaviour have changed. For example, whether nuisance was caused by drug or alcohol problems that the applicant is successfully managing.
- 9) Whether the member of the household responsible for the behaviour is still a member of the household.
- 10) Whether the Council can accept any assurances from the applicant as to future behaviour and is signed up to an agreement setting out the behaviour that is expected of them.
- 11) If the unacceptable behaviour is believed to be due to physical, mental or learning difficulties, whether, with appropriate support, the applicant could maintain a tenancy.

Applicants to whom the rule is applied will be written to and informed that:

- 1) The unacceptable behaviour rule has been applied to their case, and they do not qualify until the behaviour has been resolved.
- 2) What they must do to resolve the problem, and
- 3) They have a right to ask for a review of the decision made to disqualify them.

Where an applicant is disqualified, any new application will only be reconsidered at the request of the applicant and only where there has been no reasonable cause for complaint or concern against the applicant (or members of their prospective household) for a continuous period of 12 months. It is the applicant's responsibility to notify the Council when they have, in their view, resolved the issue and they will need to present evidence to support this as part of any new application.

Non-qualification rule 4: Sufficient financial resources

This rule has been adopted because applicants with income, investments or savings at or above this level should be able to resolve their own housing need.

With regard to finances, single and joint applicants will not qualify to join the register if:

- 1) The household is a single person without children on their application with a gross income of £30,550 or above
- 2) The household is a Couple without children on their application with a gross income of £54,990 or above
- 3) The household consist of a single person/couple with children on their application with a gross income of £54,990 or above, or
- 4) The household with or without children who have savings or investments of over £16,000

Income Thresholds will increase in line with CPI.

Non-dependent adult children's income will be considered as part of the household's total income assessment along with the income of the applicant, their partner or joint applicant.

These financial limits will be reviewed every two years in line with the financial market. 'Sufficient financial resources' includes any assets or investments even if they are not immediately available to the applicant.

Although under this rule applicants assessed as having sufficient financial resources cannot join the Housing Register, it does not prevent them being considered for any low-cost part ownership, or full ownership schemes. On request, information can be given as to which Housing Associations or developers are currently operating such schemes in the Rugby area and how applications can be made.

The following income will not be counted towards the income thresholds:

Disability Living Allowance paid for a child aged 16 and under
Personal Independence Payment Mobility Component where that component is used to pay for a Motability vehicle
Attendance Allowance and Personal Independence Payment Care Component where that component is used to pay solely for disability related expenses
Armed Forces Independence Payment
Industrial Injuries Disablement Benefit
War Disablement Pension

Any lump sum payments that would fall to be disregarded by the Housing Benefit Regulations

Non qualification rule 5: Homeownership, or legal interest in homeownership

An applicant cannot qualify for the housing register if they or their partner own a residential property in the UK or elsewhere. Applicants who have been the owner of a residential property within the last 7- years will be required to provide proof of the proceeds from the

sale and of the disposal of any proceeds. Where proceeds from any sale have been spent recklessly and, as a result, takes an applicant's financial resources below the disqualification level set, an applicant can still be determined as not qualifying for the housing register.

Exemptions to the financial resources and homeownership qualification rules

Applicants who do not qualify under the homeownership or financial resources rules may be considered as an exception if:

- a) If as a result of a divorce settlement a Court has ordered that an applicant may not reside in the former matrimonial or civil partnership home in which they still have a legal interest for a period which is likely to exceed 6 years.
- b) If someone is a homeowner and is statutory homeless (owed the main duty) due to domestic abuse and their property has not yet been sold, a decision will be made as to whether to treat this as an exemption based on the facts and circumstances of the case.
- c) The applicant has a substantial disability, and their current home is not suitable for their specific needs. This is intended to cover situations where a person owns their own home but where it is agreed that they are no longer able to manage in it due to their advancing years, or due to a substantial disability that makes living in their home impracticable and where selling is unlikely to provide sufficient funds to access alternative accommodation that would be suitable for their needs.

Non qualification rule 6: Former or current rent arrears or another housing related debt

This section sets out the rules for when an applicant:

- a) Will not be allowed to qualify for the Housing Register because of former or current rent arrears or another housing related debt, or
- b) Will be allowed to qualify but will not be allowed to bid or be considered for an offer until their rent arrears or housing related debt have been resolved to the satisfaction of the Council.

This section explains the rules relating to:

- 1) Current or former rent arrears or another housing related debt owed to Rugby Borough Council, or rent arrears owed to another Council or a Registered Provider Housing Association, and
- 2) Current or former rent arrears owed to a private sector landlord

Current or former rent arrears or another housing related debt owed to Rugby Borough Council, or rent arrears owed to another Council or a Registered Provider Housing Association

Generally, applicants who have housing related debt as defined under this policy will either:

- a) Not qualify to join the housing register if the debt owed is over £2,000 or
- b) Can qualify but will not be entitled to bid or be considered for an allocation of housing until the debt is resolved as per the rules set out below. Note if an applicant is allowed to join the housing register they will be ineligible to be considered for an offer until the debt has been resolved but they will still be allocated a band and will accrue their time in band whilst they take action to resolve the debt as per the rules set out in this section of the policy.

- c) For housing-related debts of £1 - £499 an applicant will still be considered for an offer of accommodation with no penalty).

Housing related debt is defined as:

- a) Any current or former tenant rent arrears or charges for use and occupation owed to Rugby Borough Council or any Local Authority, registered provider housing association or private sector landlord
- b) Temporary accommodation charge arrears for a license, or a non-secure tenancy, where that temporary accommodation was provided by Rugby Borough Council.

Housing related debts apply to both the applicant and any partner included in their application.

The purpose of this qualification rule is:

- To ensure any relevant debt owed to the Council, or another Council or another landlord is recovered and
- To consider whether an applicant's current position creates a risk of future non-payment of rent.

The following framework will be used to guide officers when applying this qualification rule. The Council will consider:

- 1) The reasons why the applicant accrued the housing related debt and whether there are exceptional circumstances that should be considered when applying the rule.
- 2) Whether the debt has been caused by factors difficult for the applicant to control, such as the 'spare room subsidy' rule (bedroom tax) or financial abuse.
- 3) Whether the applicant still owes that debt, and if they do, the extent of the arrears/debt as well as whether it is a recoverable debt currently being pursued or a statute barred debt.
- 4) Whether the applicant has taken debt advice, acted on it, and entered into an arrangement to clear the arrears/debt.
- 5) If an arrangement has been made, the amount of arrears/debt paid off, any amount outstanding, and the regularity of payments made.

After considering the above the Council will decide whether the applicant will not qualify for the housing register, or that they will be allowed to qualify, but will not be able to bid or be considered for an offer until the issue has been resolved to the satisfaction of the Council. Debts of over £2,000 will mean that the applicant automatically will not qualify for the housing register until that debt has been reduced to under that amount, after which the rules set out below must be met before they will be allowed to bid or be considered for an offer of accommodation.

Applicants with housing related debts between £501 and £1999 will be eligible to join the register but not be allowed to bid or be considered for an offer of social housing until they have made a repayment commitment to clear the debt and are making regular payments of an agreed sum which they have maintained for a period of:

- 6 months where the debt is £1,000 or over
- 3 months where the debt is between £500 and £999

This will normally mean not having missed a single payment.

They will still be allocated a band and will accrue their time in band whilst they take action to resolve the housing related debt as per the rules in the policy.

The applicant will be expected to continue making regular payments of the agreed sum until the debt is cleared – if payments are missed then the application will again be suspended from being able to bid or from being considered for an offer until the arrears are cleared, or payments have been made satisfactorily for at least a further three months.

If there are any arrears still outstanding when an applicant is made an offer, they will be expected to sign an agreement to continue the agreed payments after they have moved into their home.

For applicants who are assessed as not qualifying for the housing register under this rule because the amount owed is over £2,000, a new application will be considered when either:

- a) They have reduced the debt to under £2,000, or
- b) There are changed circumstances that the Council agree are exceptional after considering the facts of the case presented

Current or former rent arrears owed to a private sector landlord

The Council normally only consider rent arrears from an applicant's or joint applicants last private rented tenancy in the circumstances where the Council has obtained information that confirms on the balance of probabilities that a debt is owed. If there is a debt owed it will be for the assessing officer to decide on the facts gathered, the level of debt and the reasons for it, whether the applicant should be classified as a non-qualifying or should be allowed to qualify and if so whether they should be suspended from bidding or being considered for an offer until the debt is resolved. Where it is established that a debt is owed the same rules will apply as per a social housing debt above.

Where an applicant or their partner has held a private rented tenancy in the last 5 years the Council will write to their last private rented landlord or lettings agency to enquire as to the reasons why the tenancy was terminated and whether there were any rent arrears at the point the applicant left the property.

The Council will only contact the landlord or agent for the last rented property. However, where it comes to the attention of the Council that there were significant rent arrears relating to a previous private rented tenancy in the last 5 years that was not the applicant's or joint applicants last tenancy, a decision will be taken on the facts of the case whether to suspend the applicant from being considered for an offer until the debt is resolved.

Non-qualification rule 7: Applicants seeking to obtain accommodation by making a false or misleading statement or by withholding relevant information, or by failing to inform the Council of any material change in circumstances

Any applicant seeking to obtain accommodation by making a false or misleading statement, by withholding relevant information, or by failing to inform the Council of any material change in circumstances may be prevented from qualifying for the Housing Register, or where they are already registered, may have their application cancelled. Prosecution will be considered where it appears to the Council that a criminal offence has been committed.

Proceedings for possession will be taken to recover any tenancy granted in consequence of a fraudulent application for housing.

It will be for the housing needs assessing officer in the first instance to decide if any errors contained in an application were deliberately made or not. If the officer is satisfied that the errors were not deliberate, or that they had no impact on the application, then no action will be taken though the applicant may be warned about the need to provide accurate information and the consequences for not doing so.

Once removed from the Housing Register on these grounds, applicants will not be able to reapply for a period of 12 months. Decisions to remove the person from the Housing Register will be made based on the seriousness of the attempted fraud or false information given, including an assessment of why information was withheld.

Non-qualification rule 8: Introductory tenants (Council) and starter tenants (Housing Associations) will not be permitted to apply for a period of 12 months unless there are overriding management reasons which have been agreed by the Housing Advice and Benefits Team Supervisor or Team Leader

Any applicant who is a Council introductory tenant, or Housing Association starter tenant will not normally be allowed to join the Housing Register for a period of 1 year (from the start date of their current tenancy). However, in some circumstances exceptions may apply. Specific circumstances where the Council may consider qualification for exceptional circumstances include:

- Where a new tenant is subject to domestic abuse or severe harassment, or
- Where a new tenant experiences a sudden and severe physical disability which means their home may no longer be suitable.

Each case will be assessed on its own merit.

Rule 9: Removal from the Housing Register for refusing 2 suitable offers

As set out in the Council's statement on choice any applicant who refuses two suitable offers (whether through bidding successfully for a property or being made a direct offer) will be removed from the Housing Register for a period of 12 months except where there has been a material change in circumstances such that the two offers of accommodation would no longer be suitable. The 12-month exclusion shall be from the date the Council notified the applicant of its decision. An example of a material change in circumstances could be where since the removal from the register an applicant's health has deteriorated so significantly that the 2 offers made would no longer be suitable.

There is no set time period relating to the refusal of 2 offers therefore if a second suitable offer were to be refused for example 3 years after the first this would still result in the applicant's removal from the register for a period of 12 months.

The Council will determine whether an offer was reasonable for an applicant to accept using the suitable offer criteria set out at appendix 5.2.

Applicants owed any of the statutory homeless duties will be made only one suitable offer in writing and a refusal will mean that their banding priority for being owed a statutory homeless duty will be removed.

An offer of suitable accommodation for an applicant owed a statutory homeless duty could be either a private rented property, or a social rented property. Should the applicant refuse an offer that is considered both suitable for their needs and reasonable, then, subject to the Council's homelessness review procedure, the homelessness duty owed will be discharged and they will lose any priority status granted to them based on the homelessness duty owed.

In these circumstances the Council will then assess whether they have another housing need as defined by the Policy that would allow them to be banded and owed a second suitable offer under the Policy. If they do not, they will be removed from the Housing Register.

Applicants can receive up to two suitable offers of accommodation (note the exception in 6.6.4 for certain households awarded a priority due to homelessness). Applicants that are homeless will receive one suitable offer. If the Council considers that the applicant has unreasonably refused two offers of suitable accommodation (one suitable offer for homeless applicants) the application will no longer qualify for an allocation and the applicant will not be entitled to apply again within 12 months of the date of disqualification unless there has been a change in circumstances rendering the previous offer of accommodation unsuitable or where a further homelessness duty is owed.

An offer of accommodation which is arranged by way of a nomination to a registered provider will be considered to be a suitable offer. An offer of a local authority tenancy will be considered to be suitable. Applicants will be notified of all decisions, and the applicant has the right to review any decision that is made.

All applications within Bands 1 (with the exception of band 1 homeless applicants) and 2 will be re-assessed after 6 months for those awarded Band 1 priority and after 12 months for Band 2 applicants, to determine whether the circumstances/needs that led to the award are still prevailing. If upon the Council's re-assessment, a lesser award is given, the application will revert to the original date of registration.

All applications within Band 1 will be re-assessed after 6 months to determine whether the circumstances/needs that led to the award are still prevailing. If upon the Council's re-assessment, a lesser award is given the application will be given the original date of registration.

Applicants will be notified in writing of all decisions and the applicant has the right to a review on any decision that is made.

2.4 How the Council will consider exercising discretion for exceptional circumstances

The Council will retain the ability, in exceptional circumstances, to exercise its discretion when applying any of the qualification rules listed, or any other rule adopted under this policy. Any person who is not a qualifying person by reason of the above criteria may be

deemed to be a qualifying person for exceptional circumstances by the Housing Advice and Benefits Team Manager or an equivalent senior service manager responsible for housing in Rugby.

Where in their application to join the Housing Register an applicant makes a case for discretion to be applied for exceptional circumstances, this will be considered as part of the application. Otherwise, where the case for discretion has not been made out as part of the application, the applicant will have a second chance to make the case for why discretion should be applied through the review process. For example, where an applicant has requested a review for a decision that they do not qualify, or a decision as to what band is owed, they may make the case for why discretion should be applied to their case for exceptional circumstances.

It is for the applicant to request a review and make the case for why discretion should be applied to their case for exceptional circumstances. Any request for a review by an applicant of a decision that they do not meet a qualification rule, or for any rule in the policy to be waived, will also be taken to be a request for any exceptional circumstances to be considered. This request for review should be within 21 days of their application being refused.

Where requested, the Council will consider whether the applicant's circumstances (or those of a member of the applicant's household) are so exceptional that discretion should be applied.

The applicant will receive a written decision on their claim for exceptional circumstances to be applied within 56 days and, where that decision is that the case is not considered to be exceptional, reasons will be given.

Note the Council cannot waive the eligibility rules for any applicant who is not allowed to access social housing under the immigration and 'persons from abroad' rules set by Central Government.

In deciding whether an applicant's circumstances are exceptional the Council will fully consider the Equality Act 2010 and Children Act 2004 where children are part of the applicant's household. With regard to the Equality Act, the Council will specifically consider:

- a) Whether the person, or a member of their household, meets the definition for one or more of the nine protected characteristics listed in the Equality Act 2010
- b) If we agree that the applicant or a member of their household comes under the definition for a protected characteristic, the Council will fully comply with Section 149 of 2010 Equality Act and ensure it has obtained all relevant information relating to the applicant's protected characteristic and will consider that if they were not able to qualify for the Policy, whether this would have an exceptionally detrimental impact on the person with that protected characteristic: and
- c) Ensure any decision that the applicant's circumstances are not exceptional will be a decision that is a proportionate means of achieving the legitimate objectives for the policy.

Section 3: General Rules and Conditions

3.1 Decisions

All decisions taken under this Allocation Policy will be by a Waiting List Team Officers with the exception of:

- 1) Decisions to allocate outside of band or date order in band – Waiting List Team Supervisor or Team Leader or an equivalent senior service manager responsible for housing in Rugby.
- 2) Decisions to exempt an applicant from the qualification rules based on exceptional circumstances - Housing Advice and Benefits Team Manager or an equivalent senior service manager responsible for housing in Rugby.
- 3) Decisions to allocate to existing Councillors of the Borough, housing staff or former Councillors. - Housing Advice and Benefits Team Manager. See list of delegations for decisions in this respect in the relevant section below

3.2 Persons entitled to be considered as part of the application

Joint applications may be accepted and will be treated as one application. The housing need of the whole household will be considered in assessing housing need.

Persons entitled to assistance must be members of the applicant's immediate family who normally reside with the applicant. Any other person or persons will only be considered as entitled if the Council is satisfied that it is reasonable for that person to reside with the applicant. This will exclude lodgers or anyone sub-letting from the applicant.

Applicants should only include persons on their application who are a permanent member of their household and who will be occupying the accommodation offered as their only or principal home.

People who usually live with the applicant but are temporarily absent may be considered as a usual household member at the discretion of the Council, depending on the facts of the case.

Specifically, a person's housing application can include the following household members:

- a) Spouses or civil partners where the applicant lives with and/or intends to live with their spouse or civil partner
- b) Partners where the applicant is currently cohabiting with a member of the same or opposite sex
- c) Children who reside permanently with and are dependent upon the applicant. Children are defined as under 18 for these purposes
- d) Adult children over the age of 18 where it is accepted that:
 - they have been part of the applicant's household for a period of 12 months prior to their application to the Council; and
 - they reside with the applicant as part of their household,

- and the applicant will also need to demonstrate that this is not a short term or temporary arrangement.

If the applicant claims there are exceptional circumstances for why other household members should be included that do not meet the criteria above, this will be considered under the exceptional circumstances section of this policy.

Family members who do not currently reside in the UK cannot be added to a Housing Needs Register application under any circumstances.

The Council may also refuse to consider an application for assistance or someone's inclusion on an application if the person concerned (i.e., other than the applicant) has made a separate housing application.

The Council may decide to carry out a visit to an applicant's residence if their priority is sufficient for an allocation of housing under this Policy. If a visit is carried out it will include an inspection of the accommodation, facilities and arrangements and are normally, but not necessarily, arranged by appointment.

Joint tenancies are normally granted by the Council or a Housing Association where applicants have a long-term commitment, for example, married, or unmarried long-term couples, or civil partners. This decision is for the Council or relevant Housing Association offering accommodation, who will decide whether to allow a joint tenancy based on the facts and circumstances of the case.

For households with access to children through a Child Arrangement Order, the Council will adopt the test set out in Section 189(1)(b) of Part 7 of the Housing Act 1996 to decide whether any child both lives with and is dependent on the applicant. Unless this test is passed an applicant will only be able to be considered for the size of accommodation relevant to their circumstances.

For households eligible to be rehoused only because of the housing need of a 'restricted persons' (as required under the homelessness legislation), the Council has a duty to arrange as far as practicable, an assured shorthold tenancy with a private landlord.

If the main applicant is eligible and not subject to immigration control, non-eligible dependent children and other dependent family members will be taken into account when deciding the size of accommodation that the household is entitled to.

3.3 Assessing applications

Any band awarded reflects an applicant's housing need with the higher the band awarded (with Band 1 being highest) reflecting a greater level of assessed housing need.

Applicants will be required to sign a declaration, or to give informed consent, to confirm their understanding that:

- The information given is correct and that they will notify the Council of any change in their circumstances
- Enquiries will be made concerning their eligibility for housing and level of priority; and

- Information may be sought from other organisations.

Once an applicant provides information, the Council will process that information under Article 6 of the UK-GDPR. The processing is necessary under the 'Public Task' purpose and is necessary for the Council to perform a task in the public interest or for its official functions, in this case to meet its legal responsibility to assess housing applications, and we are satisfied that the task or function has a clear basis in law.

It is the responsibility of the applicant to provide all the information requested to assess their circumstances, and to provide any supporting information or documents that are requested. Incomplete information will mean the Council is not able to complete its assessment until it has in its possession all the information it requires.

All incomplete applications will be cancelled after a period of 28 days measured from the date further information has been requested. If cancelled, this does not prevent the applicant making a subsequent application at a later date, although in such cases the applicant's effective date of registration may not be backdated to the date of the earlier application.

Rugby Borough Council may request information, or a reference from an applicant's current or previous social landlord and may request a reference from the most recent private sector landlord (or any other recent private sector landlord) if the applicant is, or has been, a private sector tenant. This is to check whether there has been any breach of tenancy conditions or rent arrears.

Where a social or private sector landlord does not reply within 28 days any other information or records available will be checked to try to determine whether there are any concerns regarding the way an applicant may have conducted their tenancy. An applicant should not be disadvantaged if, despite every effort, it is not possible to obtain a reference from their current or previous landlord within 28 days.

All applications are subject to verification checks, and these may be applied:

- At the point of initial application
- Following any change of circumstance notified to the Council by the applicant
- Following any routine validation audits
- Following an annual review of the application
- At the point of an offer of accommodation
- At the point of letting.

If accepted onto the Housing Register the applicant will be informed of:

- a) The band they have been placed in (this determines priority)
- b) The date of application (this is used to determine priority within the band allocated)
- c) The size and type of properties for which they can bid
- d) Their application reference number (applicants will need this to bid)
- e) How to seek a review against their banding if they think it is wrong.

If an application to join the housing register is refused the applicant will be informed in writing and will have a right to review the decision made.

3.4 Medical priority

If the Applicant or a member of their household believe that they have a medical need to be rehoused, the Medical Circumstances section of the form should be completed. Applicants will be asked to provide information about why their current home is affecting their health. In these instances, GP patient summaries and any letters of support from Medical Professionals and/or Occupational Therapist will be requested of the applicant if they are available. Evidence submitted by an applicant should outline how their current housing specifically affects their medical condition or physical or mental health disability. Most cases will be assessed by a Waiting List Officer using the guidelines set out in this section of the Policy and referencing the examples set out in appendix 3. For more complex cases a Senior Waiting List Officer will make the decision and may, at the Council's discretion, be referred for an independent medical opinion to help the officer decide whether an award is appropriate.

When assessing whether to award Band 1, 2, or 3 or no priority, the Council will follow the five-stage assessment set out below:

- 1) Is the medical/disability issue serious enough for a priority banding to be considered?
- 2) If the medical condition is serious enough for a priority banding to be considered the assessing officer will then decide if there is a direct link between the identified medical problem and the applicant's current housing accommodation/situation, i.e., on the facts obtained (from the applicant and any medical information or reports submitted including any advice from an independent medical advisor or occupational therapist if sought, or required) does the assessing officer accept that the applicant's current housing accommodation/circumstances are making their medical condition or disability substantially worse, or will make it worse?
- 3) In practical terms, the officer will consider the adverse effect this has on the applicant's ability to manage day-to-day tasks in their current home. The applicant's current housing accommodation/circumstances may be impacting on their medical condition or disability but not to the extent that an award of Band 1 or 2 or 3 priority should be granted under the criteria adopted for the Policy. There are examples listed in Appendix 3 for when an award of Band 1 or 2 or 3 may be awarded and they are used to guide the officer when making their decision.
- 4) Before making an award, the assessing officer needs to be satisfied there is a realistic expectation that the impact on the identified medical condition/disability would be removed, or significantly improved, through the provision of alternative accommodation.
- 5) If the officer is satisfied that the impact on the identified medical condition/disability would be removed or significantly improved, they would then decide whether to award Band 1 or 2 or 3 depending on the severity of the impact.

3.5 When medical priority will not normally be awarded

Medical priority will not normally be awarded in the following circumstances:

- a) Where the applicant has a health issue, however severe, that is not impacted by the accommodation occupied
- b) Health problems that are not affected by housing or cannot be improved by moving
- c) Where a move would only make a marginal improvement to the applicant's condition
- d) Medical impacts caused by housing defects that are likely to be rectified in a reasonable time frame
- e) Where another reasonable course of action is available to the applicant to resolve their difficulties
- f) Time-related medical problems (e.g., pregnancy-related problems or a broken leg)
- g) Disrepair problems not impacting significantly on the applicant's medical condition. (Note: under the Policy an applicant may receive priority separately for living in unfit or unsatisfactory housing depending on the assessment made of their circumstances and impact)
- h) Overcrowding not impacting significantly on the applicant's medical condition. (Note: under the Policy an applicant may receive priority separately for being overcrowded)
- i) If the situation can be resolved by equipment or minor adaptations which can be implemented in a reasonable period of time.

Medical assessments are not just related to banding. The Council will also consider requests for future housing, for example regarding the floor level a household may need and whether an extra bedroom is required due to a child having autism or another condition. Guidelines for assessing extra bedroom requests for ADHD, Asperger's, sensory processing difficulties, and other mental or physical health problems are set out in Appendix 3.

3.6 Independent Living Accommodation

The Housing Waiting List covers both those who apply for general needs housing (accommodation intended for those under the age of 60) and those whose preference is for Independent Living accommodation.

Independent Living accommodation is for those applicants over the age of 60 years who wish to apply for designated older person's accommodation. Vacancies that fall within this category will only be open to this group of applicants. This will also cover couples where 1 person is of qualifying age for pension credit and the other is between 50 and 61.

The Council does have discretion, in certain circumstances, to let to households with a particular need. For example, the Council may let a property within an independent living Policy to a younger person, who is receiving Personal Independence Payment.

Each case will be considered with regard to the personal circumstances of the person involved, as well as any potential impact upon those persons living as part of a community of older people in an Independent Living Policy.

3.7 Checks into any court cases or unspent criminal convictions

All applicants and members of their prospective household will be requested to disclose any pending court cases or unspent criminal convictions.

The Council may use any information disclosed (or any other information obtained during the assessment or following registration) to ascertain whether the applicant should be disqualified from joining, or from remaining on the Housing Register, after applying the serious unacceptable behaviour rule.

Spent convictions are not required to be disclosed and will not be taken into account in assessing a person's eligibility to join the Housing Register. The assessment will consider whether there is evidence of any current serious unacceptable behaviour regardless of whether a person has been convicted in the past for that behaviour.

If the Council decides that, on the information obtained during the assessment process, there is a pressing need for further information, relevant inquiries will be made of the Probation Services or other Agencies.

Information gained will not automatically exclude an applicant from the Housing Register. Information received may also be used to make informed decisions about the suitability of any property that may be offered.

All assessments will be carried out in accordance with data protection and information sharing policies and other legal requirements.

3.8 The requirement to inform the Council of any change of circumstances

Applicants are required to inform the Council in writing of any material change in their circumstances that may affect their priority for housing. Examples of a change in circumstances include but are not limited to:

- a) A change of address or contact details, for either themselves or members of their household
- b) A change in their medical condition or disability (either existing or newly acquired)
- c) Additional family members or other people they wish to add to their application (It will be for the Council to decide whether they will allow additional people to join the application)
- d) Any family member or any other person on the application who has left their household; and/or
- e) Any significant changes in income, savings, or assets, that may require a reassessment under the income and savings qualification rule.

Applications may be temporarily suspended, meaning no bids will be considered, while the Council assesses the information provided by the applicant and completes further enquiries that may be necessary.

Where following a change in an applicant's circumstances this results in a change to the applicant's application or banding, they will be informed in writing.

Note: on allocation of accommodation, verification checks into the applicant's current circumstances are likely to be carried out again by the Council or Housing Association that owns the property. This is to ensure the allocation is being made in accordance with the applicant's current housing circumstances and needs at the time of a prospective offer.

Therefore, a failure to notify the Council of a change in circumstances may lead to an offer of housing being withdrawn and the application suspended whilst changes that were not notified to the Council are assessed.

3.9 Applications from elected Council members, staff members or relations

To ensure the Council is seen to be treating all applicants fairly, any application for housing or rehousing from members of the Council, or employees of the Council or their relatives must be disclosed.

If an applicant has a connection with the Council they are treated no differently than any other applicant. However, before any offer of accommodation is made this must be authorised as set out below:

- Any applicant who is a current elected member of the Council, or a former elected member of the Council – Chief Executive for Rugby Borough Council (CEO)
- Any applicant who is a current member of staff of the Council – Housing Advice and Benefits Team Manager
- Any applicant who is a former member of staff of the Housing Service within the past 10 years – Housing Advice and Benefits Team Manager
- A close relative of any current member of the Council's Housing Service defined as mother, father, son, daughter, brother, sister, partner, uncle, aunt, grandparent, or grandchild - **Housing Advice and Benefits Team Leader.**

Lobbying on behalf of any person is not allowed in any circumstances by, or on behalf of, a councillor or member of staff.

3.10 Re- registration of current applicants

Every active applicant on the Register will have their application checked annually, or more frequently if required, to ensure the application information is kept up to date and to efficiently manage the administration of the register. This is called a re-registration process.

At the anniversary of the application date, or when carrying out a review, each applicant will be contacted, usually by letter or email, or in future via their on-line portal to confirm their application is still required and will be asked to check their application details are still correct.

If an applicant has not responded after 28- days, then the application will be cancelled.

3.11 Cancelling applications

An application will be cancelled from the Housing Register in the following circumstances:

- a) At the request of an applicant
- b) Where an applicant does not respond to an application review, within the specified time set out in any correspondence sent to them
- c) Where the Council or Housing Association has housed the applicant
- d) When a tenant completes a mutual exchange

- e) Where we have tried to make contact, on at least three occasions, and no response has been received. A notification will be sent to the last known address.
- f) Where the applicant has died unless the applicant had a partner or joint application in which case the application will be suspended and the new circumstances assessed following contact from the Council.
- g) Where, at the housing application or any reassessment, an applicant has not supplied information requested within 28 days
- h) Where an applicant already registered becomes ineligible or is disqualified under the rules adopted for this policy
- i) Where the applicant buys a property either through the 'Right to Buy' or 'Right to Acquire' or through the open market or inherits a property.

Any applicant whose application has been cancelled has the right to ask for a review of that decision.

3.12 Deliberate worsening of circumstances

Social housing in Rugby is an extremely scarce resource in demand from a large number of applicants, some of whom will never realistically receive an offer of accommodation from the Council. The Council has a responsibility to make the best use of its housing stock by ensuring that allocations of houses are made only to those who are in genuine housing need.

For this reason where there is evidence that an applicant has deliberately made their housing situation worse in order to gain a higher banding, the assessment of their needs will be based on the circumstances before the change in their situation brought about by their actions to deliberately worsen their circumstances. This will be considered at the point their application is assessed or, for applicants already on the Housing Register, at the point they request a change in banding due to a claim that their circumstances have changed.

Examples of deliberately worsening circumstances include:

- Applicants who have allowed family members or others to move into their property, who previously had suitable accommodation, or the financial means to secure their own accommodation, and this has resulted in the property being overcrowded unless the addition to the household is considered to be unavoidable such as an older relative requiring full time care.
- Homeowners who have transferred their property, any other capital assets or savings and investments to another person with the intention of gaining social housing.
- Applicants who have given up affordable and suitable private rented accommodation that they are able to maintain to move in with other relatives or friends, creating a situation of overcrowding.
- Requesting or colluding with a landlord or family member to issue them with a notice to leave their accommodation.

These are examples only. There may be other circumstances in which the Council decides that an applicant has deliberately worsened their circumstances.

3.13 The review procedure

Under the housing legislation an applicant has a legal right to request a review of any of the following decisions reached by the Council:

- a) A decision that an applicant is ineligible, or not a qualifying person to join the Housing Register
- b) A decision regarding which band an applicant has been awarded
- c) The priority date granted for the band awarded
- d) To remove an applicant from the Housing Register
- e) Any decision about the facts of the case that has been used to assess their application including the decision the Council has made regarding who can be included in the application
- f) Where an applicant considers that a decision has been reached based on incorrect information.

3.14 How a request for a review will be dealt with

Applicants who are unhappy with a decision made under the Allocation Policy can request a review preferably by writing to us at the address at the bottom of their letter or by email to bandingandhomelessreviews@rugby.gov.uk or by telephoning the number in the header of the decision letter within 21 days of receipt of the decision. The review will then be undertaken by an officer senior to the decision maker.

We aim to notify the applicant of the outcome of the review in writing, including the reasons for their decision within 56 days; however, this is a target timescale and may be longer depending on operational pressures.

There is no right to request a review of a review decision.

3.15 Rural Allocation Policy

For some properties in rural settings a local connection to the parish will need to be established. Properties may be advertised with the specific parish connection criteria required or applicants may be matched directly for an offer using the parish connection criteria.

Applicants will need to demonstrate their connection to the local area and by meeting at least one of the following criteria:

- People who currently live in the parish and have done so continuously for at least the last two years and who require a move.
- People who have lived in the parish for at least two years out of the last 10 years.
- People who used to live in the parish and who have immediate family (mother, father, adult son, daughter, brother or sister) living in the parish and have done so for at least five years.
- People who are employed in the parish in permanent paid work, and have been for at least 12 months.
- People who have adult relatives living in the parish to whom it is essential to live near in order to give or receive care or significant support. For example, elderly relatives who need help with shopping, personal care, transportation to hospital or

GP appointments, young families who need help with child care or couples and single people living independently for the first time. You will need to be able to demonstrate why you need to live in the same parish in order to provide or receive this care and support. Where an applicant is in this situation we may require supporting evidence from, for example, a GP or Social Worker.

If there is not an applicant that meets the above parish connection criteria, we will adopt the following approaches, listed in order of how we will use them:

The property will be advertised twice; and if remains unallocated will be advertised for a third time with the above criteria removed.

3.16 Local lettings policies

Local lettings initiatives are not just confined to parishes and may be applied to meet the particular needs of a parish, local ward, block, estate or area, or to address sustainability and community issues to ensure that the housing allocation Policy is able to contribute to building sustainable communities.

There are two types of Local Lettings Plan used by Rugby Borough Council:

- Local Lettings Plans for re-lets in a designated area
- Local Lettings Plans for first time lets on new developments

The following are examples of local lettings policies that may be deployed under this Policy. The list is for illustrative purposes and is not exhaustive.

- a) Age restrictions
- b) Prioritising applicants who are key workers
- c) Restrictions on lettings to vulnerable households where there are already a concentration of supported tenants/residents in a street or block
- d) Lettings to childless households where there are high concentrations of children and young people living on a specific estate, street, or block
- e) Ensuring that there is a balance of working and non-working households allocated to a Policy

New developments will normally have local lettings policies regardless of whether the new development is subject to a Section 106 agreement or affordable housing statement. Where a new development is subject to a Section 106 planning agreement the criteria set will be followed.

In agreeing any local lettings policies, the Housing Advice and Benefits Team Manager will work closely with the Landlord to decide if such a policy is appropriate and the evidence for why.

There must be a clear evidence base for adopting a local lettings policy. The following framework will be used by the Council to decide whether a local lettings policy is appropriate:

- 1) That there is a clear definition of the objective to be achieved by that particular local letting policy

- 2) That there is a clear evidence base to back up the need for a local lettings policy
- 3) That any potential equality impact has been considered
- 4) How long the local lettings policy is intended to operate; and
- 5) When the local lettings policy should be reviewed.

A written record of each policy adopted should be kept.

3.17 Assessing overcrowding and the bedroom size that can be allocated

In determining the number of bedrooms required, one bedroom is required for each of the following:

1. Applicant and Partner
2. One bedroom for any additional adult couple
3. Two children of different sexes up to the age of 10
4. Two children of the same sex under the age of 16
5. Each child over the age of 16
6. Each child in receipt of the higher or middle rate of care component of Disability Living Allowance. In these circumstances further evidence will be required.
7. Where the Council agree that an overnight carer is required

Note 1: In assessing overcrowding and the size of home to be allocated where a child is over the age of 10 and not yet 16 the Council will consider a child to be overcrowded on the basis of sex overcrowding if the sex they are transitioning to would result in sex overcrowding if they are receiving specific medical treatment as defined below for gender dysphoria through the NHS Children and Young People's Gender services.

Medical treatment is defined as:

- a) Hormone therapy from a specialist consultant endocrinologist, or
- b) Puberty blockers (gonadotrophin-releasing hormone analogues). Note the Government has made a decision that puberty blockers will from March 2024 not normally be available to children for gender incongruence or gender dysphoria but will still be available for children who have started such treatments

Additional notes on how the Council will apply the overcrowding and bedroom size allowed criteria:

- 1) Children will not be considered as part of the household of the applicant if the children have a main permanent residence elsewhere.
- 2) Couples will usually not be expected to share a bedroom with children.
- 3) Couples can be treated as needing two bedrooms only if there is an exceptional medical need and the Council's medical assessment agrees with this need.
- 4) Where an applicant is an approved foster carer the size of the property will take into account the number of children normally fostered in the last 12 months.
- 5) For measuring overcrowding and the size of the home that can be allocated the Council may include household members who are temporarily absent from home.
- 6) Non-dependent children will only be considered as a member of the household if they have been living with the applicant as their permanent full-time residence for a period of

over 12 months. This may be waived for non-dependents who give or receive care from the applicant.

- 7) Commercial lodgers are not considered in the same way as non-dependents. (In this context commercial lodgers are non-family members who are receiving board and/or lodgings in return for payment, or payment in kind). This may be waived for those classed as commercial lodger who gives or receives care from the applicant.
- 8) An extra bedroom may be awarded where there is a severely disabled adult or child who the Council agree, based on the facts assessed, needs their own room.
- 9) Single people may be offered a studio.
- 10) Unborn children will be taken into consideration when the pregnancy reaches 29 weeks.
- 11) Council tenants under occupying in their current properties from properties with three or more bedrooms will be allowed, if they wish, to be considered for properties with one bedroom more than they need.
- 12) An applicant should note that for Registered Provider properties, the provider association may have adopted different criteria for determining the number of bedrooms a household requires.
- 13) Carers who provide regular overnight care may be granted a bedroom based on the assessment of the facts of each case. The fact that there is overnight care will not necessarily mean an extra bedroom will be allowed. The decision will be based on the facts of the case including:
 - the number of days overnight care is provided.
 - whether there is a requirement for the carer to remain awake and
 - what other facilities are available in the home.

3.18 Secure and flexible Council tenants

In alignment with the Localism Act 2011, the local authority will offer flexible tenancies of up to five years for 4 and 5-bedroom properties and for adapted properties. This approach aims to optimize the use of our housing stock while addressing the diverse needs of our community. The flexible tenancy model allows for greater mobility within the housing market, encouraging tenants to make the most appropriate choices for their circumstances. It also supports the efficient allocation of adapted properties, ensuring that they are occupied by individuals or families who require such accommodations. The policy will be regularly reviewed to ensure compliance with legislative changes and to assess its impact on local housing needs. The local authority is committed to fostering a sustainable community and will work closely with tenants to provide support throughout their tenancy.

Secure or flexible Council tenants wishing to move from their existing home will be assessed in the same way as other applicants applying for housing advice and assistance under the Allocation Policy. As such they will also be subject to the qualification criteria set out in section 2.

Where a secure or flexible Council tenant is imprisoned for a period of more than 12 months and would therefore either accumulate rent arrears or possibly lose their tenancy, they can voluntarily give up their tenancy. Upon release, they would be made a direct allocation of a secure or flexible Council tenancy that meets their needs. The size of accommodation would be the same as their previous tenancy, or a size that meets their needs under the terms of this Allocation Policy, whichever is smaller. This will not apply to tenants who have been imprisoned in relation to a crime that would enable the Council to

seek repossession of their accommodation for that crime. Where this applies the Council will normally take repossession action.

3.19 Mutual Exchanges (Homeswapper)

These do not fall within the scope of the Allocation Policy, and full details for how these schemes operate can be obtained from Rugby Borough Council. A mutual exchange is where secure Council or housing association tenants swap their homes. It does not involve any property becoming empty. You need your landlord's permission before any mutual exchange can take place. They cannot withhold this permission unreasonably. The grounds for refusing permission could include:

- exchanges leading to overcrowding or under-occupation of one of the properties;
- exchanges where recovery or legal action is being taken against either tenant because of rent arrears or other problems with the tenancy conditions;
- exchanges involving the landlord's special-needs accommodation where this is not needed by the applicant or a member of his or her household;
- if the accommodation has been provided under a planning condition and the incoming tenant does not qualify; or
- if the tenancy agreement does not allow exchanges between tenants.

Details about Mutual Exchange can be found at the following website:

www.homeswapper.co.uk

3.20: Requirement for a payment of a month's rent in advance for all new Rugby Borough Council lettings

For all new allocations to properties owned by the Borough Council new tenants will have to pay a month's rent in advance as a condition of being granted a tenancy. Note Housing Associations will have their own rules on whether a payment of rent in advance is required or not.

Section 4: How to apply and how an applicant's banding will be assessed and when a band will be awarded

4.1 How to apply and the verification information required to assess your application

Instead of different waiting lists, the Council works with housing associations in Rugby to produce a Common Housing Register.

Eligible applicants only have to fill in one application form to be considered for housing by the Council or a housing association operating in Rugby.

Applications for the Housing Register are currently made by completing an application form downloadable from the Council's website, or by paper copy upon request.

After completing the application form it should be emailed to waitinglistapplications@rugby.gov.uk or posted to the Town Hall.

The applicant will need provide a number of documents for all the persons on the application, including evidence of identity. Examples of acceptable documents are:

- Passports and birth certificates
- Marriage certificates
- Driving licence
- National Insurance number card
- Mortgage statements
- Council correspondence
- P60
- Payslips
- Bank statements
- Tenancy agreement
- Rent statement
- Child Benefit notification letter
- Proof of Immigration Status

If your housing application relates to one of the below, you should also provide supporting evidence of your housing need for:

- a) Medical grounds
- b) Unsatisfactory housing conditions
- c) Someone in your household is pregnant
- d) Serving or former member of the armed forces
- e) Providing or receiving care

The Waiting List Team can advise the applicant on:

- Understanding all of the housing options available to them,
- Helping an applicant to complete their application form when all other avenues of support such as family members, Citizen Advice, or any other Support Agencies have been exhausted.
- Understanding how quickly they may be able to secure an offer of accommodation depending on the areas bid for
- Helping an applicant to access additional support if they require it

The Council will need to be satisfied that any accommodation provided is financially affordable. At the start of the registration process and upon being made an offer of accommodation, all applicants will be required to provide details of their income and expenditure.

4.2 The date a band will be allocated

The band start date will usually be the date the application to join the housing register has been received or the date any requested documentation is provided if this is later. Any notification of a change in housing need and/or circumstances which result in a reassessment that changes the banding award will be effective from the date that notification was received if the application is to be placed in a higher band.

Note: for eligible homeless applicants who meet the qualification rules to join the Housing Register the following will apply with regard to their band start date:

- a) Owed a Section 195(2) Prevention of homelessness duty – Band date is the date the duty was owed and not the date of the homelessness application.
- b) Owed a Section 189B (2) Relief of homelessness duty – If an applicant has not been owed a prevention duty, then the band date is the date the relief duty is owed and not the date of the homelessness application. If the applicant was owed a prevention duty which ended because they became homeless and they are then owed a relief duty, the effective date is the date the prevention duty was owed. If the applicant has been awarded band 1 reasonable preference on medical grounds prior to the acceptance of any prevention or relief duty, they will retain this band date.
- c) Owed the Main Section 193(2) duty – Band date is the date the Relief of homelessness duty was owed and not the date the Main duty was owed. This is because to start the date at the date the Main duty was owed would disadvantage an applicant by 56 days who has been found to be in priority need and unintentionally homeless
- d) Circumstances where the relief duty has ended, and the applicant is assessed at this point as not being in priority need - Band date is the date the Relief of homelessness duty is owed (or the date the prevention duty was owed if the applicant had been owed a prevention duty before being owed the relief duty) and not the date that the Relief duty is brought to an end
- e) Circumstances where the relief duty has ended, and the applicant is assessed at that point as not being owed a main duty due to being intentionally homeless - Band date is the date the Relief of homelessness duty is owed (or the date the prevention duty

was owed if the applicant had been owed a prevention duty before being owed the relief duty) and not the date that the Relief duty is brought to an end

- f) Where the applicant becomes homeless unintentionally within 2 years of accepting a private rented sector offer, offered to bring the main Section 193 homelessness duty to an end, the effective date will be the date of the new application.

4.3 The bands adopted by the Council

The demand for social housing exceeds supply in Rugby and therefore this Policy prioritises the housing of applicants assessed as being in the greatest need. Once registered many applicants will still unfortunately not have sufficient housing need to be offered a property.

The 'banding system' will normally be used to decide when to make an offer of accommodation and to whom (there are exceptions see section 1.8 for when the Council may choose to make an offer outside of band order or outside of date order within band).

The Council has chosen to adopt a simple and transparent system creating 4 queues where people will normally be ranked by date order in each queue as long as they qualify to be included on the housing register. The housing bands are summarised below, and full details are set out in Appendix 1. To be awarded any of the bands an applicant must qualify to be included on the register. This means they must meet the local connection rules and not be disqualified under any of the other adopted rules, unless the Council has agreed that discretion should be applied to waive the residential connection rule, or another qualification rule, due to exceptional circumstances.

The bands are:

Band 1 – Urgent priority statutory housing need to move: these are applicants that are owed a statutory award of 'reasonable preference' but whom the Council also believes should also be awarded 'additional preference' based on their very urgent housing need.

Band 2 – High priority statutory high housing need to move:

This band consists of applicants that are owed a statutory award of 'reasonable preference' under the policy and have been awarded band 2 priority based on their assessed high housing need.

Band 3 – Moderate priority statutory moderate housing need to move:

This band consists of applicants with a statutory need but that need is assessed as moderate and a lower housing need than for Bands 1 and 2.

Band 4 – Low priority low housing need to move: e.g., people in Houses in Multiple Occupation (HMOs), elderly applicants who qualify for older person housing only.

Note although most shortlists will be based on the applicant's band and date registered in that band for applicants with multiple needs within the same band they will be given additional priority meaning they would normally go to the top of any shortlist for that Band

based on their cumulative need. If the shortlist contains several applicants with multiple needs within their band they will be ranked in the date order that they were registered for that Band.

Applicants owed any statutory homelessness duty as set out in the policy will not usually be given additional priority for multiple needs unless the council accepts a relief duty for a person who has already been awarded medical priority band 1.

4.4 Quota for applicants owed a homeless duty

In order to reduce the financial impact on the Council for homeless households occupying temporary accommodation, and to ensure that the Council is able to meet its legal duty to provide suitable temporary accommodation at all times, the Council may decide to target a percentage of all annual lettings (a quota) for allocation to applicants owed a homeless duty residing in temporary accommodation. If a quota target is adopted it will normally be set at the start of each financial year and may change during the year according to demand pressures.

The Council may wish to apply quotas for other groups and information about any quota if set for the homeless or for any other needs group will be detailed on the Council’s website.

4.5: The detailed criteria for the 4 Bands

Welfare or hardship needs
Examples may include:

Band 1	Applicant or partner is pregnant and within the third trimester and living in an HMO.
Band 2	<ul style="list-style-type: none"> • Child in need – applicant’s accommodation poses a risk to any child who is a permanent member of the applicant’s household. This will occur where the child or children are the subject of a child protection plan and the Child Protection Conference recommends rehousing as being important for the welfare of the child. • Applicants who currently spend more than 25% of their net income on privately renting a property where a move would prevent financial crisis due to high rent. • Applicants who are having difficulty meeting their rent and where moving would prevent significant financial hardship. An assessment of this would be completed such as an income and expenditures form.

Band 3	<ul style="list-style-type: none"> • Applicants who are currently renting a pre-1919 property with an Energy Performance Certificate (EPC) rating of E, F or G where a move would prevent financial crisis due to energy bills. An assessment of this would be completed such as an income and expenditures form. • Applicants who need to move closer to a relative to provide or receive assessed care and/or support and where moving would prevent significant physical, psychological or financial hardship. • Applicants who do not currently reside within the borough but have paid employment or a confirmed offer of paid employment within the borough and where moving would prevent significant financial hardship. The applicant’s main place of work must be located within the borough and the employment would normally need to be for at least 16 hours per week and on a contract that is permanent or expected to last for a period of at least 12 months).
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Domestic abuse, violence and harassment

Examples may include:

Band 1	<ul style="list-style-type: none"> • Applicants with an urgent need to move immediately due to domestic abuse, where a move would prevent further abuse. The definition of domestic abuse used to assess applicants under the policy is the definition set by the Domestic Abuse Act 2021 which includes both physical and non-physical forms of domestic abuse. • Applicants with an urgent need to move immediately due to violence or significant threats of violence that are likely to be carried out, where a move would prevent further violence. • Applicants with an urgent need to move immediately due to severe harassment, where a move would prevent further harassment. <p><i>The Council recognises that some circumstances may be exceptional and cannot be effectively resolved through the use of an injunction or other legal action or remedies. In the interests of fairness to all applicants these circumstances are kept to a minimum.</i></p> <p><i>These urgent needs will be assessed based on supporting evidence from relevant professionals such as senior officers within the Police or other agencies as necessary in conjunction with a Council approved risk assessment.</i></p> <p><i>Verification may also be given by a formally established organisation such as the Risk Assessment Management Panel under the countrywide Multi Agency Public Protection arrangements (MAPP), Multi Agency risk Assessment Conference (MARAC) or the National Witness Support</i></p>
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	<i>Scheme. Supporting evidence from the Rugby Community Safety Partnership, Violence Reduction Unit or similar organisations / alliances may also be considered.</i>
Band 2	<ul style="list-style-type: none"> Applicants who need to move due to threat of domestic abuse, violence or harassment but who are not in immediate danger. This will be assessed based on evidence from a relevant agency such as the Police as necessary in conjunction with a Council approved risk assessment.
Band 3	<ul style="list-style-type: none"> Applicants who have been suffering from ongoing anti-social behaviour e.g. noise nuisance, verbal abuse or property damage <u>and</u> where rehousing is the only effective solution. The applicant must have reported issues to their landlord and/or the Police for action <u>and</u> engaged in support. The Council must be satisfied that sufficient action has been taken by the landlord and/or the Police but despite this it has not been possible for the issues to be satisfactorily resolved.

Homelessness or risk of homelessness

Band 1	<ul style="list-style-type: none"> Applicants owed the Main Housing Duty under Section 193(2) by Rugby Borough Council Applicants who have lost a 'life' tenancy due to domestic abuse and are owed a statutory homelessness duty by Rugby Borough Council. Applicants who are owed the Relief duty under Section 189B (2) by Rugby Borough Council where, at the point of duty acceptance, they are considered likely to be owed the Main Housing Duty under Section 193 if the relief duty were to end unsuccessfully. This will only apply where the applicant is in temporary accommodation provided by the Council. Applicants owed a Relief duty under Section 189B (2) by Rugby Borough Council where reasonable preference has already been awarded for a medical need.
Band 2	<ul style="list-style-type: none"> Applicants who are owed the Relief duty under Section 189B (2) by Rugby Borough Council.

	<ul style="list-style-type: none"> • Applicants whose Relief duty under Section 189B (2) owed by Rugby Borough Council has been brought to an end and they are determined to be homeless but not in priority need, and therefore not owed the Main Housing Duty. • Applicants who are pregnant or with children who are at risk of exclusion from the family home. The Council must be satisfied that the applicant's living arrangement with family is short-term and very insecure, and that the applicant has no tenancy or ownership rights. The applicant's Prevention Duty under Section 195(2) by Rugby Borough Council has ended because the applicant's family have agreed to continue to accommodate the applicant for at least six months.
<p>Band 3</p>	<ul style="list-style-type: none"> • Applicants whose Relief duty under Section 189B (2) owed by Rugby Borough Council has been brought to an end and they have been assessed as being intentionally homeless, and therefore not owed the Main Housing Duty. • Applicants owed the Main Housing Duty under Section 193(2) by Rugby Borough Council where the Relief duty was brought to an end due to their deliberate non-cooperation. • Applicants owed the Prevention Duty under Section 195(2) by Rugby Borough Council. • Applicants who meet the reasonable preference criteria as set out in the Housing Act 1996 (2) but have no local connection.

Medical or mobility needs
Examples may include:

Band 1	<p>Band 1 for Emergency Medical Need is only for applicants who have a severe progressive or life-threatening medical condition or disability. They need to move immediately because either their accommodation or housing circumstances are unsuitable, and do not meet their medical needs and poses an immediate and serious danger to them. The applicant's accommodation cannot be adapted to be made suitable. Applicants with an Emergency Medical Need may be in the following circumstances:</p> <ul style="list-style-type: none"> • Applicant cannot access toilet or bathing facilities in their current accommodation due to limited mobility. • Applicant cannot be discharged from hospital. • Applicant has a terminal medical condition (within 12 months) and rehousing is urgently required to enable the provision of suitable care. • Applicant is housebound due to severe mobility issues and cannot safely leave their accommodation without assistance. • Applicant has an assessed need to move to wheelchair suitable accommodation.
Band 2	<ul style="list-style-type: none"> • Applicants who have a severe, long term, medical condition (chronic or progressive) or disability and have a high need to move because their home is directly detrimental to their medical condition. • Occupational Therapist recommendation confirms that applicant requires a level access shower (wet room), downstairs toilet or ground floor / level access accommodation. • Applicants with a long-term medical condition (chronic or progressive) who are vulnerably housed i.e., sofa-surfing or in some form of temporary housing, that does not meet their medical need.
Band 3	<ul style="list-style-type: none"> • Applicants who have mobility issues and struggle with steps/stairs. For example, they need a level access shower (wet room), downstairs toilet or ground floor / level access accommodation. • Applicants who have a significant physical or mental health condition that is directly affected by their accommodation. Rehousing would make their condition easier to manage. The Council must be satisfied that the applicant has meaningfully attempted all other solutions first, and rehousing is the only effective solution. Evidence from a relevant medical professional is required. • Applicants who have an evidenced need for an additional bedroom e.g. for overnight care from a non-resident carer, or to accommodate a substantial amount of medical equipment, as determined by this council.

	<ul style="list-style-type: none"> • Where one or more household members have an evidenced need for their own bedroom as they are unable to share as determined by this council • Applicants who have a terminal illness which is not significantly affected by their current accommodation but where, moving nearer to essential wellbeing support/care would significantly improve their quality of life.
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Overcrowding and size

Band 1	<ul style="list-style-type: none"> • Where a household is either statutory overcrowded or overcrowded by 3 or more bedrooms as defined in the policy
Band 2	<ul style="list-style-type: none"> • Where a household is overcrowded by 2 bedrooms as defined in the policy
Band 3	<ul style="list-style-type: none"> • Where a household is overcrowded by 1 bedroom as defined in the policy

Disrepair or poor housing conditions

Examples may include:

Band 1	<ul style="list-style-type: none"> • Applicants who are residing in a private sector property that is not safe to live in, where remedial works are not possible, and the property is subject to a demolition or prohibition order. • Applicants who are residing in a private sector property which poses a Category 1 hazard under the Housing Health and Safety Rating System (HHSRS). The Council must be satisfied that the issues cannot be remedied by the landlord within a reasonable time period (normally six months) <u>and</u> as a result the continued occupation will pose a considerable risk to the applicant's health. For example, major structural defects including subsidence, flooding, collapse of roof, severe damp etc.
Band 2	<ul style="list-style-type: none"> • Applicants who are living in accommodation that permanently lacks modern facilities such as a bathroom, kitchen or inside toilet (for example touring caravans or houseboats). This does <u>not</u> include applicants with communal access to shared facilities.

	<ul style="list-style-type: none"> Applicants who are living in accommodation that permanently lacks an adequate supply of hot or cold water, electricity, gas or heating in the living area. The Council must be satisfied that a permanent supply cannot be provided.
Band 3	<ul style="list-style-type: none"> Applicants who are living in accommodation where one or more key building components have significant disrepair issues. This includes external walls, roof, external windows/doors, chimneys, central heating boilers, gas fires, storage heaters, plumbing and electrics. The Council must be satisfied that the issues cannot be remedied by the landlord within a reasonable time period (normally six months). Applicants with a child aged under five who reside in an upper floor flat defined as 1st floor and above, that is accessed via a communal stairwell (inside or outside) within a block of flats. This will only apply if the child is a permanent household member.
Band 4	<ul style="list-style-type: none"> Applicants over the age of 55 and who are living in accommodation where the kitchen or bathing facilities are shared with another household to whom they are not related. For example, within a house in multiple occupation (HMO).

Management need

Band 1	<ul style="list-style-type: none"> Rugby Borough Council tenants who are under occupying and release a property with two or more bedrooms by moving to a property with fewer bedrooms. This includes where applicants have succeeded to a Council tenancy following the death of a relative. Rugby Borough Council tenants who have succeeded to a Council tenancy following the death of a relative but cannot remain in the property (e.g. because the property would be under-occupied).
Band 2	<ul style="list-style-type: none"> Rugby Borough Council tenants who release a wheelchair adapted property (or a property with major adaptations) and move to a lesser or non-adapted property. Rugby Borough Council tenants who are affected by re-designation. Rugby Borough Council tenants whose home will be demolished or required for major works within 12 months, and they are unable

	<p>to return. Properties must be within a Council approved clearance or regeneration area/Scheme.</p> <ul style="list-style-type: none"> • Rugby Borough Council tenants who release a general needs property by moving into older persons Independent Living accommodation only. • Registered Provider tenants who are under occupying and release a property with two or more bedrooms by moving to a property with fewer bedrooms. This will only apply where Rugby Borough Council has nomination rights for the property being released. • Applicants who are not eligible to succeed to a Council tenancy following the death of a relative. This will only apply where the applicant has lived in the property with the tenant for at least 12 months prior to the tenant's death and remains in the property.
Band 3	N/A

Armed Forces

Band 1	<p>Applicants with urgent housing need and have no access to other accommodation.</p> <ul style="list-style-type: none"> • Applicants who are serving (and will soon leave) the regular forces who are suffering from serious injury, illness, mental ill health or disability which is attributable to the person's service. • Applicants who have recently ceased (or will cease to be entitled) to reside in accommodation provided by the MOD following the death of their spouse or civil partner who has served in the regular forces and whose death was attributable (wholly or partly) to that service. • Applicants who are serving or have served in the reserve forces and are suffering from a serious injury, illness or disability which is attributable to the person's service. <p>These applicants may need to provide discharge documents (or equivalent) or a certification of cessation of entitlement to occupy a service quarter.</p>
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Band 2	<ul style="list-style-type: none"> • Applicants who are serving in the regular forces and will be discharged within 6 months. • Applicants who have separated or are divorced spouse or civil partner of a serving member of the armed forces and as result of the separation or divorce will have to leave service accommodation provided to the member of the armed forces and their family by the Ministry of Defence. • Applicants who are the bereaved spouse or civil partner of a member of the armed forces who was serving in the armed forces when they died and where their death was not attributable to that service. • Applicants who were serving in the regular forces in the last 5 years and have applied to join the Waiting List within that 5-year period and had served for 5 years or more. <p>An award to an applicant who is or was serving in the armed forces award will not normally apply for applicants who is being discharged or left the armed forces because of a dishonourable discharge.</p>
Band 3	N/A

Ready for “move-on”

Band 1	<ul style="list-style-type: none"> • Warwickshire Care Leavers approaching their 18th birthday who are ready for move on from care. Evidence of accredited tenancy readiness program has been provided along with an approved Pathway Plan. Applications may be submitted within 6 months of their 18th birthday via the Care Leavers ‘Move on Protocol’ but offers of accommodation will not be made until the successful applicant reaches aged 18 with the exception of applications made by the House Project. • Warwickshire Care Leavers aged 18-21 years who are ready to move on from an extended placement such as Staying Put or Supported Lodgings who have been in band 2 for over 12 weeks without an offer or who are within 16 weeks of placement being due to end. • Applicants on the Rugby Borough Pathway Scheme who are ready to “move on” into independent accommodation. Evidence that the
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	<p>applicant is ready must be provided for example a “move on” report.</p> <ul style="list-style-type: none"> • Applicants in supported accommodation and are ready to “move on” into independent accommodation where a “move-on protocol” is in place with Rugby Borough Council and where the accommodation provider affords Rugby borough Council 100% nomination rights to the vacancy. Evidence that the applicant is ready must be provided for example a “move on” report.
<p>Band 2</p>	<ul style="list-style-type: none"> • Warwickshire Care Leavers aged 18-21 years moving from an extended placement such as Staying Put or Supported Lodgings. Evidence of accredited tenancy readiness program has been provided along with an approved Pathway Plan. If the application is submitted before the young person is ready to move on, an offer of accommodation will not be considered until the Personal Adviser confirms readiness for move-on. • Applicants in supported accommodation and are ready to “move on” into independent accommodation where a “move-on protocol” is in place with Rugby Borough Council. Evidence that the applicant is ready must be provided for example a “move on” report.
<p>Band 3</p>	<ul style="list-style-type: none"> • Applicants in supported accommodation and are ready to “move on” into independent accommodation (evidence that the applicant is ready must be provided for example a “move on” report) where there is no “move-on protocol” in place between Rugby Borough Council and the supported accommodation project.
<p>Band 4</p>	<ul style="list-style-type: none"> • Applicants who are neither an owner nor a tenant at their current accommodation and have no security of tenure. This might include lodgers or adult children living with parents who would like to be rehoused. • Absent parents who are vulnerably housed i.e., sofa-surfing or in some form of temporary housing who have co-parenting responsibilities, but the child is not a permanent member of the household.

4.6: Advertising properties

The Council operates a choice-based lettings (CBL) policy for available Council-owned properties and nominations to available properties owned by registered provider housing association landlords. Available homes are advertised weekly on our website and applicants are invited to bid to become the new tenant of the home. Information on bidding and how to bid is also available online.

Adverts will clearly indicate any restrictions on bidding (e.g., where properties have been adapted and/or are specifically for people with disabilities) and will detail any particular criteria that apply (e.g., any affordability criteria).

Available properties will normally be advertised on a weekly basis and applicants given a restricted timeframe to place a bid. The bidding rules and deadlines will be available to applicants. We will not accept any bids received after the deadline.

4.7: The bidding and selection process

Properties are advertised weekly when noticed is received. An applicant may express an interest through bidding on any advertised property that meets their needs.

- Bids will only be registered if the applicant is on the housing register
- Applicants will not be contacted individually if their bid is unsuccessful, however the results of the bids will be advertised on a regular basis on the Council's CBL website
- Applicants can express an interest on a maximum of 5 properties in any single bidding cycle
- Bids can be withdrawn at any time prior to the closing date
- When the applicant wishes to bid for more than one property they will be prompted to capture their preference in numerical order,
- Bids will be accepted from nominated representatives of the applicant. To make a bid on behalf of an applicant the representative will be required to give the Housing Application Reference Number, National Insurance Number and date of birth for the first applicant
- Bids received after the advertised closing date and time will not be accepted under any circumstances
- At the end of each lettings cycle the bids will be sorted in order of:
 - a) Meeting the lettings criteria as stated in the property advert
 - b) Date order from Bands 1 to 4. Where an applicant has bid for more than one property and is top of the short list for more than one property, they will be offered the property for which they first bid.
- Applicants are encouraged to check their Housing Online housing portal to ensure the bids they have placed are recorded and the order of priority reflects their preferences

Assisted bids

The Council reserves the right to place a bid on behalf of the applicant (Assisted Bidding).

If the applicant has not reasonably bid for a suitable property within 12 weeks of their Band 1 award, the local authority reserves the right to place bids on the applicant's behalf.

Applicants owed a band 1 homeless duty can bid for properties of their choosing for the 1st 4-weeks of the 12-week period following their band 1 award.

Their Homelessness Prevention Officer will place bids on their behalf on all suitable properties between weeks 4 and 12.

At the end of the 12-week period the Homelessness Prevention Officer will consider extending the period or making a Direct offer of accommodation.

Applicants awarded band 2 or band 3 (relief or prevention duties) will have bids placed on all suitable properties for them by their Homelessness Prevention Office from the 1st bidding cycle following the date of the award.

4.8: Offer of accommodation

This section sets out the procedure that will apply to making an offer of accommodation once an applicant has been selected from a shortlist of successful applicants bidding for that property.

We will carry out verification checks on all applicants. These checks are to ensure that all the information we hold relating to an application is up to date. Verification checks may be carried out as part of a pre-tenancy interview process or we may carry out a home visit prior. If the property advertised is a housing association home the association are likely to carry out their own verification checks.

We will contact the successful applicant at their last notified address, email address or telephone number to complete verification check. If the successful applicant does not respond to this contact within two working days their bid will be disregarded and the next shortlisted applicant will be contacted.

Following a successful verification check the successful applicant will be offered the property. They will be invited to view the property when it is ready to let. At the viewing, they will be offered the tenancy of the property and invited to sign their tenancy agreement for the property. There may be times where a viewing would be prior to the letting but will be stated by the officer at the time of offer. If an applicant requests more time to make a decision, they will be asked to contact the lettings team with their decision by 9.30am on the next working day.

If the applicant refuses the offer of a tenancy or fails to contact the lettings team with their decision by 9.30am on the next working day, the next shortlisted applicant will be invited to view and accept an offer of the tenancy of the property, and so on until an offer is accepted.

From time to time it may be necessary to arrange multiple viewings of a property. In these circumstances, the decision on whether to accept a tenancy must be made at the viewing. The offer of a tenancy will be made to the top bidder present, if refused to the next ranked bidder and so on until the offer of a tenancy is accepted.

Where two or more bidders have the same effective date of application within a band, the Council will normally give priority to the applicant with the earliest original date of application.

The Council will disregard the highest shortlisted bidder and invite the next shortlisted Bidder to view in the following circumstances:

- Where priority is given to a particular group and the applicant is not in that group
- Under the terms of this allocations scheme, the applicant does not meet the criteria for the property bid for
- The applicant failed to respond within two working days to a request to arrange pre-tenancy interview and verification check
- The applicant fails to attend an arranged viewing
- Where a property is adapted bidders may be shortlisted on which applicant's circumstances best match the adaptations in the property advertised.
- The applicant is a tenant of the Council or a registered provider and following their successful bid they are found to have committed anti-social behaviour or to have rent arrears, or their current property is found not to meet the leaving standard, or they have committed any other breach of tenancy conditions
- Following their successful bid, an applicant is found to not qualify for the housing register
- Since joining the Housing Register an applicant has become ineligible.
- On verification of the applicants' details, the priority band has been incorrectly awarded due to the information received by the applicant or due to mistakes in the assessment of the application itself.
- The applicants' circumstances have changed since the priority band was awarded and the applicant is no longer entitled to the same level of priority.
- The Council or the Housing Association landlord for the property being advertised has evidenced housing management reason not to offer the property to the person selected

As part of the pre offer verification checks applicants will be expected to provide evidence of their identify and the identity of anyone to be rehoused with them, as well as their current address before any tenancy can be agreed. A home visit may be required to confirm this.

If the Council discovers the details are incorrect, no offer of accommodation may be made.

Applicants will only be offered one property at a time. Once an offer has been made to an applicant they will not be shortlisted or able to be considered for other offers of accommodation they have bid for until the current offer is refused.

As part of the offer we will provide details of the property and make arrangements to view it as quickly as possible. Applicants are expected to decide whether to accept or refuse the offer at the viewing and will also be offered the opportunity to sign for the tenancy at the viewing. If applicants do not inform the Council of their decision immediately or within 24 hours of the viewing the offer may be withdrawn and the property allocated to the next suitable bidder.

If an applicant does not reply to an invitation in writing, by letter or email, to view a property within 2 working days the offer will be deemed to have been refused and the property will be offered to the next applicant on the shortlist who qualifies for that offer. This will then count as one of the applicant's 2 reasonable offers unless a satisfactory explanation for the applicant's failure to respond is accepted by the Council.

Where the offer is to an applicant owed a statutory homeless duty, the process and timescales outlined above may differ. The Homelessness Prevention Team will look on a case-by-case basis. A property will not be reoffered until the Council have been informed of the applicant's refusal or failure to attend the appointment to view and have made a decision whether or not to enforce the offer to end the homeless duty owed.

A suitable and reasonable offer of accommodation is defined in appendix 2 of the policy.

There may, unfortunately, be exceptional circumstances where, following a viewing or notification of offer an offer may still be withdrawn. This can be done up to the point before a tenancy is signed. Examples of reasons when a property offer may be withdrawn are:

- The property is not suitable for the households needs
- The property fails to become available
- The offer has been made in error
- The property is required for an emergency for another applicant or tenant
- It transpires that the rent would not be affordable

There must be clear grounds for refusing or bypassing applicants who are top of any shortlist and these will be recorded by the Council, or a partner Housing Association where the property advertised is owned by them.

4.9: Acceptance of an offer made under the choice-based lettings bidding system or through a direct offer

If an applicant accepts an offer of a Council tenancy and the property is ready for letting, they will be invited to sign for the tenancy and complete all necessary paperwork.

The council reserves the right to withdraw an offer where the property has been pre-allocated and there is an unexpected delay in the ready to let date.

Where the offer is of a joint tenancy, then both parties to the tenancy must attend the letting appointment to sign the paperwork. If only one-party attends, the letting will not proceed, and the offer of a tenancy will be withdrawn.

If an applicant is a tenant of the Council or a local registered provider, they must give up vacant possession of their existing property and the keys must be returned to the Council's customer service centre or to the registered provider, by an agreed date. The tenant will be liable for both rents once the tenancy agreement is signed until the keys have been returned.

When the tenancy agreement has been signed, the tenant's housing register application will be cancelled. A new housing register application must be completed if the tenant wishes to be considered for re-housing in the future and there is a new housing need.

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Section 5: Appendices

APPENDIX 5.1: DEFINITION OF A REASONABLE OFFER

Where accommodation is offered an applicant will normally be expected to accept an offer of a property that meets their specified needs. Reasonable offers are those that are deemed as suitable and appropriate to meet the housing and medical needs of the household concerned and are affordable to the applicant and his or her household.

The suitability criteria used to determine whether an offer to end a main homeless duty owed under Section 193(2) of the Housing Act 1996) or a relief of homelessness duty owed under Section 189b, will be the criteria set down in the Suitability of Accommodation Order England 2012, as amended by Section 12 of the Homelessness Reduction Act 2017, relevant case law and statutory guidance.

These criteria only apply to an offer of social housing or private rented housing made with the intention of ending a full homeless duty. Where an offer is made to any other banded applicant who is not owed a full homeless duty it is for the council to decide on the facts of the case whether the offer is suitable using the guidance in this appendix to help the officer make the decision.

The Council will consider that a property is reasonable if all of the following criteria are met:

- It is located in an area that the Council considers to be suitable for the applicant and their household. This could include accommodation located outside of the Rugby area
- If it is affordable for the applicant and his or her household based on his or her financial circumstances at the time of offer
- It is sized in accordance with the criteria in this Policy
- It complies with any recommendation made by a medical or other relevant advisor.

In determining the reasonableness of the offer the Council will consider the following:

- a) The significance of any disruption to the employment, education or caring responsibilities of the applicant or a member of the household
- b) The accessibility of medical or other support facilities that are currently used by the applicant or a member of the household
- c) The accessibility of local services, including places of worship, amenities, and transport
- d) Its duty to safeguard children under Section 11 Children Act 2004
- e) Its public sector equality duty under Section 149 Equality Act 2010
- f) If a suitable property is located outside of the borough's boundary then the Council has to take into consideration the distance from the applicant's existing accommodation in the borough.

The above are matters for the Council to determine based on the facts of the case.

Guidance for assessing officers on how the Council will assess reasonable and unreasonable refusals:

1) Property size

The property must be the appropriate size for the household's needs at the time of making the offer. Where the family composition has changed, so that the property offered is too small or large for the applicant's needs, the refusal will be recorded as reasonable.

It is the applicant's responsibility to ensure that they register any change in their circumstances that will affect the number of bedrooms to which they are entitled.

Where the applicant refuses a property because it is too small on grounds of the need for an additional or larger bedroom(s) due to medical/mobility factors, but it meets the lettings standard, this will normally be considered to be an unreasonable refusal unless the applicant provides new medical information at the offer stage that is accepted by the Council.

2) Property type

It will not be considered to be a reasonable refusal due to a dislike of the property type. Therefore, an applicant cannot reasonably refuse an offer because for example, it is in a tower block, it does not have a garden or a particular heating system, it is on a wrong floor, or does not have a lift. If the applicant states medical grounds for refusing the property, these should already have been disclosed and considered as part of the assessment of their application, unless new information is submitted that is accepted by the Council.

Where specialist accommodation is offered to a household inappropriately, this is considered to be a reasonable refusal. This may be for example:

- a) Offers of wheelchair standard housing to households which do not have wheelchair users;
- b) Offers made to disabled applicants which are unsuitable for their needs, for example where they are unable to open a door entry system because the doors are too heavy;
- c) Offers of sheltered housing where the applicant is not of the appropriate age.

3) Property condition

Where a property is refused on grounds of repair/decoration, this will be considered an unreasonable refusal unless the voids team decides to withdraw the property from letting for further works to be carried out.

4) Area of choice

An offer will still be considered reasonable even if it is not within an applicant's area of choice.

5) Hate Crime & harassment

Where an applicant from an ethnic minority household refuses the property prior to viewing because the previous tenant was rehoused as a result of prejudice or racial harassment, or there is a known problem of prejudice related harassment in the vicinity of the property, the refusal is considered reasonable in accordance with the councils hate crime and anti social behaviour polices.

6) Choice of landlord

An applicant cannot choose whether they are rehoused by a specific Housing Association. Therefore, any refusal for example by an applicant of a property because it is a Private Registered Provider property with no 'Right to Buy', or 'Right to Acquire', or the rent is higher than another social landlord will not be considered to be reasonable (unless in the example of the rent level the assessment is that the offer is unaffordable for the applicant in question).

7) Pets

One of the conditions of the tenancy agreement is that a tenant must obtain the written consent of the landlord before keeping domestic pets.

Any intention to keep a pet must comply with the Council or Private Registered Provider tenancy terms and conditions, which means that permission must be sought and agreed prior to signing the tenancy agreement for the property. Therefore, any refusal on the basis that permission has not been granted to keep a pet is not reasonable.

5.2 Financial Help for Housing Related Costs:

Help with paying rent.

Housing Benefit is paid in some circumstances by local councils to help pay your rent. Housing Benefit has been replaced with **Universal Credit** as of 17 October 2018 for most people. If you are receiving Universal Credit you may need to claim money towards your rent through Jobcentre plus.

You may still get Housing Benefit to help you pay your rent if you're on a low income and:

- Are of State Pension Age or
- Are living in temporary accommodation, or specified accommodation where care and support is being provided.

How much benefit you receive from either Housing Benefit or Universal Credit will depend on your circumstances and how much you must pay.

Find out who can claim Housing Benefit and Universal Credit and how much you could receive.

- [Housing benefit eligibility](#)
- [What you'll get](#)
- [Calculator: check what you may be entitled to](#)

Eligibility, for Council Tax discounts and exemptions

Council Tax Reduction is paid by local councils to help pay your council tax. It replaced council tax benefit in 2013.

Local Housing Allowance

You should contact the Council in that area for details of the Local Housing Allowances to see the maximum amount of financial help that may be available through Housing Benefit or Universal Credit towards your rent or check on the [Directgov website](#).

Usually, the shared accommodation rate is used for single private renters under the age of 35 but there are some exceptions to this:

- you live with your partner.
- you are a care leaver under 25.
- you have experienced domestic abuse.
- you lived in a hostel or refuge for at least 3 months.
- you get disability benefits but do not need overnight care.
- you are a former prisoner aged 25 to 34 covered by MAPPA.
- you are a survivor of modern slavery.

Please see [Shelter](#) website for more information.

Discretionary Housing Payments

If you pay rent for your home and receive Housing Benefit or the housing cost element of Universal Credit you can apply for discretionary awards towards your rent and or council tax.

https://www.rugby.gov.uk/info/20011/council_tax/14/discretionary_awards/3

A **Budgeting Loan** can help pay for:

- furniture or household items.
- rent in advance.
- costs linked to moving house.

You are only eligible for a Budgeting Loan if you've been on certain benefits for 6 months.

- Income Support
- Income-based Jobseeker's Allowance
- Income-related Employment and Support Allowance
- Pension Credit

You can't get a Budgeting Loan if:

- You are currently claiming Universal Credit
- You owe more than £1,500 in total for Crisis Loans and Budgeting Loans

How to apply:

<https://www.gov.uk/budgeting-help-benefits>

It is faster to apply on-line; alternatively, you can obtain a form SF500 from your local Jobcentre Plus or download and print from the website.

Social Fund: Telephone: 0800 169 0140

Check if you are entitled to any grants:

<https://grants-search.turn2us.org.uk>

Rugby Borough Council Homeless Prevention Fund loans to help with tenancy deposits and rent in advance for persons whom a homelessness duty is owed.

Warwickshire Local Welfare Scheme

Planned help in furnishing accommodation with basic furniture and appliances for vulnerable groups, this includes:

- care leavers.
- victims of domestic violence.
- former armed forces personnel.
- those resettling in a community after a custodial term.

Freephone 0800 408 1448 or 01926 359182 or email:

warwickshirelocalscheme@warwickshire.gov.uk

Furniture Poverty

There are numerous buy and sell sites on Facebook and Gumtree, and charity shops where cheap furniture and household items can be found.

Free household furniture and items_ <https://www.ilovefreecycle.org>
<https://www.freecycle.org>

<https://endfurniturepoverty.org/find-furniture>

[Rugby Bareboards Trust](#) helping people on low income to furnish their homes.

Emmaus homeless charity has a store in Coventry where essential items can be purchased at low prices.

<https://emmaus.org.uk/coventry-warwickshire/shop/red-lane-shop-coventry/>

[Helping Hands House2Home](#) furniture and household goods for people recently housed and on a low income.

Warwickshire Cost of Living Support

Warwickshire Household Support Fund

This fund is designed to be used to support households facing financial challenges due to the cost of living rises, particularly those including children and pensioners to ensure that they can access the support they need to afford food, energy, and associated costs.

The fund is administered through the **Warwickshire Local Welfare Scheme**.

The Household Support Fund is available to provide short-term financial support to meet immediate needs and help those who are struggling to afford the essentials. Due to the limited amount of funds available, we will prioritise items necessary for day to day living such as food, energy, and water.

The Local Welfare Scheme also provides support towards food, energy, or other essentials. This is given either in vouchers, emergency food parcels or with credit for energy.

Freephone 0800 408 1448 or 01926 359182 or email: **Warwickshire Household Support Fund**

This fund is designed to be used to support households facing financial challenges due to the cost of living rises, particularly those including children and pensioners to ensure that they can access the support they need to afford food, energy, and associated costs.

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Freephone 0800 408 1448 or 01926 359182 or email:
warwickshirelocalscheme@warwickshire.gov.uk

For more information about financial support, housing, money, and debt go to
www.warwickshire.gov.uk/facinghardship

Food supply help and advice.

For a range of food solutions for people who may be isolated, vulnerable or in financial crisis visit www.warwickshire.gov.uk/foodsupport

Foodbanks in Warwickshire Food support if you are in financial difficulty. If you need a food parcel because you're unable to afford food, contact your local food bank.

Find details at www.warwickshire.gov.uk/foodbanks

Free school meals.

Low-income families whose children are eligible for free school meals will be offered meals for those children by their schools, during term time. Apply at <https://www.warwickshire.gov.uk/education-learning/apply-free-school-meals/2>

Help with energy costs.

If you are struggling to pay energy bills or manage energy debt, find schemes, grants and benefits to help at <https://www.ofgem.gov.uk/information-consumers/energy-advice-households/find-schemes-grants-and-benefits-help-home-energy>

Cold Weather Payments.

You may get a [Cold Weather Payment](#) if you're getting certain benefits. This scheme runs between 11/11/2023 and 31/03/2024. You'll get £25 for each 7-day period of cold weather between these dates.

Cost of Living Payment for households on means- tested benefits, including Universal Credit, Pension and Tax Credit, will receive an additional payment of £900 for this year (2023/24)

Disability Cost of Living Payment £150 will be paid to those on a qualifying disability benefit from DWP or the MOD.

Warm Home Discount is £150 off your heating bills if you get Pension Credit or live in a low-income household.

Help with household costs <https://www.warwickshire.gov.uk/managing-money-debt/benefits-welfare/1> schemes include:

- [Act on Energy - energy advice on reducing bills, grants, and heat for health](#)
- [British Gas Energy Trust](#)
- [GOV.UK - Household energy grants, energy saving and renewable energy](#)
- [Orbit Better Days](#)
- [Severn Trent Water - Trouble paying bills](#)
- [Severn Trent Water - The Big Difference Scheme](#)
- [Warm home discount scheme](#)

Help for Households <https://helpforhouseholds.campaign.gov.uk> see what support is available to help with the cost of living and save money with energy savings tips.

- Travel costs.
- Childcare costs.
- Energy costs.
- Cheaper broadband.

Help with your TV Licence.

The Simple Payment Plan was created for those in financial difficulty.

Qualifying customers can choose from either a fortnightly or monthly payment plan that spreads the cost of a TV Licence over 12 months, this means you make smaller payments more frequently, helping you to better manage your finances.

TV Licensing accepts referrals to the Simple Payment Plan from not-for-profit organisations such as charities or your local authority money advice department. It cannot accept referrals from commercial organisations.

If you would like to speak to someone about your finances, you can contact your local authority debt advice team or there are many not-for-profit organisations offering free, confidential, and independent advice. Any not-for-profit organisation providing this service can refer you to us to join the Simple Payment Plan. More information on the simple payment plan and how to access it can be [found here](#).

There are other **TV licence concessions**, which you might be eligible for depending on your circumstances. **There are concessions available for:**

- People who are [aged 75 or over and receive Pension Credit](#).
- People who are [blind \(severely sight impaired\)](#).
- People who live in qualifying [residential care](#) and are disabled or over 60 and retired.

5.3 Finding Accommodation:

To secure private sector accommodation you could look through local newspapers, as these carry details of properties that are available for letting. Free copies of local newspapers are available for you to read at local libraries.

Homes for rent are sometimes advertised in shop windows or on notice boards, and you could consider putting an 'Accommodation Wanted' card up on one of these yourself. There are several accommodation websites that may be useful in your search: if you do not have access to the internet at home, you may wish to go to your local library and use the internet facilities available there. If you do not have access to the internet, please let your Support Worker or Housing Officer know.

You could also ask your friends, family, or colleagues: if you are a member of a local club, sports team, or Church, then ask other members and participants.

You may find it easier to get accepted by landlords if you approach them directly. Landlords who do not use a letting agent are less likely to carry out credit checks, but they may need proof of your financial circumstances and renting history. Social media groups and online forums in your area may have details of properties available to rent direct from landlords.

When searching for accommodation and viewing any properties present your circumstances positively to the landlord or agent. Do not assume any landlord will not accept Housing Benefit or Universal Credit claimants. Letting to someone who needs Housing Benefit or Universal Credit to help pay the rent can be the safest way of letting to a tenant when it is set up correctly.

No DSS policies are bans on renting to tenants who claim universal credit or housing benefit.

No DSS policies and adverts are unlawful discrimination. You can complain if you see these adverts or if an agent will not deal with you because you claim benefits. Shelter the charity for homelessness and housing can help you to challenge [DSS discrimination](#). If you already pay rent to a private landlord and claim benefits, offer bank statements and references to show a good rent payment history.

You may be asked to provide [a guarantor](#) for the tenancy. Guarantors sign an agreement to cover costs if a tenant does not pay their rent or for damage. They are usually relatives or close friends. They may need to pass a credit or affordability check. You could persuade a landlord or agent that you do not need a guarantor if you can show you can afford the rent.

Some landlords do not want to let to tenants who claim benefits because universal credit and housing benefit are paid in arrears. You could offer rent in advance for the first 2 months of the tenancy. This should cover waiting time for a benefit application or change of address. You usually get your benefit on the same day each month so you could set up a direct debit for future payments. Don't arrange a bank transfer until you're sure the tenancy is going ahead. If you must pay cash, always get a receipt.

You can apply for a DWP loan if you don't have enough for rent in advance. The loans are interest free. There are limits on how much you can get. They are paid back through [deductions from your benefit payments](#). Find out how to apply for a:

- [budgeting advance](#) if you get universal credit or
- [budgeting loan](#) if you get another low-income benefit.

Many landlords and agents ask for a tenancy deposit. It must be [protected in a scheme](#). You can't be asked to pay more than the equivalent of 5 weeks' rent as a deposit. You should get it back at the end of the tenancy unless the landlord deducts money for things like damage or rent arrears.

Landlords and agents must get your permission to run a credit check. You can't be charged for it. Be honest if you don't think you'll pass a credit check. You could suggest an alternative. If you've shown the property is affordable and that you can provide references, a guarantor or rent in advance, there may be no need for a credit check.

If you are realistic and able to find accommodation in an area where you can afford to live, we may be able to help if your landlord wants a deposit or rent in advance. Consider looking for accommodation in areas out of our district close by where rents may be lower. We can help you to apply for money to cover any rent deposit or rent in advance.

You should contact the Council in that area for details of the Local Housing Allowances to see the maximum amount of financial help that may be available through Housing Benefit or Universal Credit towards your rent or check on the [Directgov website](#).

The shared accommodation rate is used for single private renters under the age of 35.

Online Lettings and Accommodation Services

There are several accommodation websites that may be useful in your search for accommodation.

www.zoopla.co.uk
www.gumtree.co.uk
www.rightmove.co.uk
www.needaproproperty.com
www.dssmove.co.uk
<https://www.openrent.co.uk>
<https://www.idealflatmate.co.uk>
www.spareroom.co.uk
homes.trovit.co.uk/rent
https://www.home.co.uk/for_rent/by_town.htm?county=warks
<https://www.dwellings.co.uk/property-to-let>

You can search on- line to find estate and lettings agents in the Warwickshire area:
www.zoopla.co.uk/find-agents/estate-agents/warwickshire

Other Accommodation Services and Websites

[NACCOM](#) temporary accommodation and support for those facing destitution in the UK asylum and immigration system.

5.4 Partnership with Registered Providers

We work in partnership with the following Registered Providers (housing associations) operating in the borough.

- **Bromford** - [We invest in homes and relationships so people can thrive.](#)
0330 1234 034
- **Clarion** - [Clarion Housing Association](#)
0300 500 8000
- **Citizen Housing** - [Citizen](#)
0300 790 6555
- **Housing & Care 21** - [Housing 21 - Retirement Living and Extra Care retirement properties for older people of modest means](#)
0370 192 4000
- **London & Quadrant (L&Q)** - [L&Q Group | Leading Housing Association & Residential Developer](#)
0300 456 9996
- **Midland Heart** - [Housing Association - Midland Heart](#)
0345 6020 540
- **Orbit** - [Orbit - Leading Housing Group in the UK | Not For Profit | Orbit](#)
0800 145 6818
- **Paragon Asra Housing (PA)** - [Home | PA Housing](#)
0300 123 2221
- **Platform** - [Housing Association | Platform Housing Group](#)
- **Sage** - [Sage Homes | Providers of quality, affordable homes](#)
0208 168 0500

- **Sanctuary** - [Sanctuary | Leading Housing and Care Provider](#)
0808 168 3474
- **Walsall Housing Ground (WHG)** - [Home - whg Housing Association](#)
0300 555 6666

Midland Heart, Clarion, WHG, and Sanctuary Housing Associations let some of their properties from their own housing waiting lists or via third party websites. To register with these organisations, go to:

- <https://www.sanctuary.co.uk/find-home/rent-home>
- <https://www.midlandheart.org.uk/find-a-home/homes-to-rent/>
- www.whg.uk.com/rent-a-home
- <https://www.myclarionhousing.com/find-a-home/rent-a-home/homefinder-uk>

Housing Information and Advice for people aged 55 and over:

- [EAC HousingCare](#) information and advice for older people
- [Housing 21 Extra-care for aged over 55](#) Web Ellis Court and Farmers Court Rugby
- [Anchor Bell Walk, Rugby, Hillmorton, CV21 4ES sheltered bungalows for aged over 55.](#)
- [Moving Soon Sheltered accommodation in Warwickshire](#)
- [Town Thorns Sheltered accommodation in Easehall.](#)
- [Queensway Court Leamington Spa and Tithe Lodge Southam Extra care housing for aged over 55 contact Orbit 0800 678 1221 \(Local connection to Warwickshire needed\)](#)

5.5 RIGHT TO MOVE QUALIFYING CRITERIA

Right to Move – Statutory guidance on social housing allocations for local housing authorities in England

An existing social housing tenant (living outside of the Rugby area) will not be disqualified on the grounds of no residential connection if they: have reasonable preference under s166(3)(e) because of a need to move to the Rugby area because the tenant works in Rugby or needs to move to take up an offer of work.

Whether or not the applicant meets the above criteria isn't solely determined by the need to move for work, but that it would cause them hardship if they were able to do so.

Definition of Work

- Work should be a permanent contract or one with a minimum term of 12 months.

- Work should be of 16 or more hours a week (unless it can be demonstrated that the earnings are substantial).
- Work should not be voluntary.
- Work can include apprenticeships.
- The relevant district should be the main place of work.
- In the case of self-employed tenants, work should be regular as opposed to intermittent.

Distance, time and travel costs

When determining hardship, the time taken to travel to work and the cost of the travel should be taken into account. The Council considers the following criteria may suggest hardship:

- Travel time to get to work is in excess of two hours each way (personal or public transport depending on circumstances).
- Travel costs are more than £30 per day or 25% of net income from the employment or there is no transport available at all.

Other factors

These factors are all considered on a case-by-case basis as to whether hardship would be faced by the applicant if they could not move:

- Would failure to move mean the applicant would lose an opportunity to gain a better job/promotion, an apprenticeship, increase hours/pay or move from unemployment to employment.
- If the nature of work likely to be available closer to the applicant's home.
- Personal factors including care responsibilities and medical conditions affected by the tenant not being able to move closer to work.
- Any other situation where hardship would be demonstrable if the tenant could not move.

Discretion

Every application will be dealt with on a case-by-case basis allowing all circumstances and variables to be considered.

Proof of Work

A combination of the following can be used as to prove that work or a job offer is genuine:

- Contract of employment (particularly if stating main place of work).
- Wage slips showing hours worked (particularly if zero hours contract) but they are unlikely to evidence the location of work.
- A letter offering employment (it is likely that the employer will be contacted to confirm acceptance).
- A letter from an employer to prove the work and location.

Right to Move Quota

No more than 1% of all lettings will be prioritised for Right to Move applicants based on the total of the previous year's lettings by the Council.

Disclaimer: Rugby Borough Council does not take any responsibility for the content of external websites including accuracy.

Appendix 2: A summary of amended Banding Criteria

BANDING (Green = Current Policy / No colour = Revised Policy)	1+	1	2	3	4
Hardship Grounds					
Has an urgent need to move to a specific area and serious hardship (financial or personal) would be caused if they did not move		√			
Non-urgent need to move to a specific area and serious hardship (financial or personal) would be caused if they did not move			√		
Welfare Grounds					
Has an urgent need to move, and failure to move would have a serious impact on the wellbeing of the applicant		√			
High need to move to a specific area			√		
Welfare and hardship needs					
Child in need – accommodation poses a risk to any child who is a permanent member of the applicant’s household. Subject to Child Protection Plans			√		
Spend more than 25% of their net income on privately renting a property where a move would prevent financial crisis due to high rent.			√		
Renting a pre-1919 property with an Energy Performance Certificate (EPC) rating of E, F or G where a move would prevent financial crisis due to energy bills.				√	
Having difficulty meeting their rent and where moving would prevent significant financial hardship.			√		

Applicant or partner is pregnant and within the third trimester and living in an HMO.		√			
BANDING (Green = Current Policy / No colour = Revised Policy)	1+	1	2	3	4
Need to move closer to a relative to provide or receive assessed care and/or support and where moving would prevent significant physical, psychological or financial hardship.				√	
Do not currently reside within the borough but have paid employment or a confirmed offer of paid employment within the borough and where moving would prevent significant financial hardship.				√	

BANDING (Green = Current Policy / No colour = Revised Policy)	1+	1	2	3	4
Violence and serious harassment					
Cannot continue to live in their current home due to serious harassment or violence		√			
Domestic abuse, violence and harassment					
Urgent need to move immediately due to domestic abuse, where a move would prevent further abuse.		√			
Urgent need to move immediately due to violence or significant threats of violence that are likely to be carried out, where a move would prevent further violence.		√			
Urgent need to move immediately due to severe harassment, where a move would prevent further harassment.		√			
Threat of domestic abuse, violence or harassment but who are not in immediate danger.			√		
Suffering from ongoing anti-social behaviour e.g. noise nuisance, verbal abuse or property damage and where rehousing is the only effective solution.				√	

BANDING (Green = Current Policy / No colour = Revised Policy)	1+	1	2	3	4
Homelessness or at risk of homelessness					
Assessed as statutorily homeless owed a main duty		√			
Owed a prevention or relief duty for whom social housing is deemed the only appropriate tenure		√			
Owed a prevention or relief duty with local connection to Rugby borough			√		
Assessed as homeless but do not have priority need			√		
Assessed as statutorily homeless owed a main duty but have a property related debt and without a sustained payment arrangement in place				√	
Owed a prevention or relief duty with no local connection				√	
Owed a prevention or relief duty with local connection but have a property related debt and without a sustained payment arrangement in place, or criminal conviction				√	
Those deemed to be intentionally homeless as the result of an adverse main duty decision				√	
Those homeless applicants who do not engage with prevention and relief activities required of them (including refusal of a suitable and final offer)				√	
Owed the Main Housing Duty under Section 193(2) by Rugby Borough Council		√			
Applicants owed a Relief duty under Section 189B (2) by Rugby Borough Council where reasonable preference has already been awarded for a medical need.		√			
Have lost a 'life' tenancy due to domestic abuse and are owed a statutory homelessness duty by the Council.		√			

Owed the Relief duty under Section 189B (2) by RBC where, at the point of duty acceptance, they are considered likely to be owed the Main Housing Duty under Section 193 if the relief duty were to end unsuccessfully. Applicable if applicant is in TA provided by the Council.		√			
Owed the Relief duty under Section 189B (2) by Rugby Borough Council.			√		
Relief duty under Section 189B (2) owed by the Council has been brought to an end and deemed homeless but not in priority need, and therefore not owed the Main Housing Duty.			√		
Applicants who meet the reasonable preference criteria as set out in the Housing Act 1996 (2) but have no local connection.				√	

BANDING (Green = Current Policy / No colour = Revised Policy)	1+	1	2	3	4
Pregnant or with children who are at risk of exclusion from the family home.			√		
Relief duty under Section 189B (2) owed by the Council has been brought to an end and have been assessed as being intentionally homeless, and therefore not owed the Main Housing Duty.				√	
Owed the Main Housing Duty under Section 193(2) by the Council where the Relief duty was brought to an end due to their deliberate non-cooperation.				√	
Owed the Prevention Duty under Section 195(2) by Rugby Borough Council.				√	
Medical / Disability					
Unable to continue to live in their current accommodation due to medical need or disability		√			
Is experiencing a significant detrimental effect on the ability to live independently in the current accommodation			√		
A move to a suitable housing would improve the applicant's health				√	
Emergency medical need only for applicants who have a severe progressive or life-threatening medical condition or disability. Need to move immediately		√			
Applicants with a long-term medical condition (chronic or progressive) who are vulnerably housed i.e., sofa-surfing or in some form of temporary housing, that does not meet their medical need.			√		

Have a severe, long term, medical condition (chronic or progressive) or disability and have a high need to move because their home is directly detrimental to their medical condition.			√		
Occupational Therapist recommendation confirms that applicant requires a level access shower (wet room), downstairs toilet or ground floor / level access accommodation.			√		
Have mobility issues and struggle with steps/stairs. E.g. need a level access shower (wet room), downstairs toilet or ground floor / level access accommodation.				√	
Have a significant physical or mental health condition that is directly affected by their accommodation.				√	
Require an additional bedroom e.g. for overnight care from a non-resident carer, or to accommodate a substantial amount of medical equipment.				√	
One or more household members have an evidenced need for their own bedroom as they are unable to share.				√	
Have a terminal illness not significantly affected by their current accommodation but where moving nearer to essential wellbeing support/care would significantly improve their quality of life.				√	

BANDING (Green = Current Policy / No colour = Revised Policy)	1+	1	2	3	4
Overcrowding and Size					
The current property is short of 3 or more bedrooms		√			
The current property is short of 2 bedrooms			√		
The current property is short of 1 bedroom				√	
Is either statutorily overcrowded or overcrowded by 3 or more bedrooms as defined in the policy		√			
Overcrowded by 2 bedrooms			√		
Overcrowded by 1 bedroom				√	

BANDING (Green = Current Policy / No colour = Revised Policy)	1+	1	2	3	4
Condition of Current Property					
Required to leave their home due to an emergency Prohibition Order (served under HA 2014)		√			
Properties assessed as having a lack of facilities / subject to statutory Prohibition or Demolition Orders. Inc conditions seriously detrimental to health and defects cannot be readily remedied		√			
RBC tenants being decanted to enable regeneration or improvements of properties		√			
Disrepair or poor housing conditions					
In a private sector property that is not safe to live in, where remedial works are not possible, and the property is subject to a demolition or prohibition order.		√			
In a private sector property which poses a Category 1 hazard under the Housing Health and Safety Rating System (HHSRS).		√			
In accommodation that permanently lacks modern facilities such as a bathroom, kitchen or inside toilet (for example touring caravans or houseboats). Excludes with communal access to shared facilities			√		
In accommodation that permanently lacks an adequate supply of hot or cold water, electricity, gas or heating in the living area.			√		
In accommodation where one or more key building components have significant disrepair issues				√	
With a child aged under five who reside in an upper floor flat defined as 1st floor and above, that is accessed via a communal stairwell (inside or outside) within a block of flats.				√	
Applicants over the age of 55 and who are living in accommodation where the kitchen or bathing facilities are shared with another household to whom they are not related. For example, within a house in multiple occupation (HMO).					√

BANDING (Green = Current Policy / No colour = Revised Policy)					
	1+	1	2	3	4
Under Occupation					
Council tenants moving on affordability grounds		√			
Council tenants moving from family sized property to a more suitable sized accommodation		√			
Management need					
RBC tenants who are under occupying and release a property with two or more bedrooms by moving to a property with fewer bedrooms.		√			
RBC tenants who release a wheelchair adapted property (or a property with major adaptations) and move to a lesser or non-adapted property.			√		
RBC tenants who have succeeded to a Council tenancy following the death of a relative but cannot remain in the property (e.g. because the property would be overcrowded).		√			
RBC tenants who are affected by re-designation.			√		
RBC tenants whose home will be demolished or required for major works within 12 months, and they are unable to return.			√		
RBC tenants who release a general needs property by moving into older persons Independent Living accommodation only.			√		
Registered Provider tenants under occupying and release a property with two or more bedrooms by moving to a property with fewer bedrooms.			√		
Not eligible to succeed to a Council tenancy following the death of a relative.			√		

BANDING (Green = Current Policy / No colour = Revised Policy)

1+ 1 2 3 4

Armed Forces

Have connection with the Armed Forces as set out in the Armed Forces Covenant	√				
Bereaved, divorced or separated spouses or civil partners of those serving in the armed forces	√				
Serving (and will soon leave) the regular forces who are suffering from serious injury, illness, mental ill health or disability which is attributable to the person's service.		√			
Have recently ceased (or will cease to be entitled) to reside in accommodation provided by the MOD following the death of their spouse or civil partner who has served in the regular forces and whose death was attributable (wholly or partly) to that service.		√			
Serving or have served in the reserve forces and are suffering from a serious injury, illness or disability which is attributable to the person's service.		√			
Due to be discharged within 6 months after serving for 5 years or more. They had previously been living in the Rugby area immediately before joining the armed forces.			√		
Have to leave service accommodation provided by MOD due to separation/divorce and previously have been living in the Rugby area.			√		
Bereaved spouse or civil partner of a member of the armed forces where the applicant or the member of the armed forces had previously been living in the Rugby area and who was serving in the armed forces when they died and where their death was not attributable to that service.			√		
Serving in the regular forces in the last 5 years and have applied to join the Waiting List within that 5-year period. Lived in the Rugby area immediately before joining the armed forces or since leaving.			√		

BANDING (Green = Current Policy / No colour = Revised Policy)	1+	1	2	3	4
Those leaving short-term Supported Housing					
In short-term supported housing (up to 2 years) and are required to move on to alternative accommodation urgently		√			
Ready for “move-on”					
Warwickshire Care Leavers approaching their 18th birthday who are ready for move on from care.		√			
Warwickshire Care Leavers aged 18-21 years who are ready to move on from an extended placement. Have been in band 2 for over 12 weeks without an offer or who are within 16 weeks of placement being due to end.		√			
Warwickshire Care Leavers aged 18-21 years moving from an extended placement			√		
In supported accommodation and are ready to “move on” into independent accommodation where a “move-on protocol” is in place with Rugby Borough Council.			√		
In supported accommodation and are ready to “move on” into independent accommodation. No “move-on protocol” in place between Rugby Borough Council and the supported accommodation project.				√	
Neither an owner nor a tenant at their current accommodation and have no security of tenure. E.g. lodgers or adult children living with parents who would like to be rehoused.					√
Applicants in supported accommodation and are ready to “move on” into independent accommodation where a “move-on protocol” is in place with Rugby Borough Council and where the accommodation provider affords Rugby borough Council 100% nomination rights to the vacancy. Evidence that the applicant is ready must be provided for example a “move on” report.		√			
Applicants on the Rugby Borough Pathway Scheme who are ready to “move on” into independent accommodation. Evidence that the applicant is ready must be provided for example a “move on” report.		√			
Absent parents who are vulnerably housed i.e., sofa-surfing or in some form of temporary housing who have co-parenting responsibilities, but the child is not a permanent member of the household.					√

Appendix 3 : Rural Allocations Policy - Proposed change to Local Connection Criteria

The existing policy

A local connection to a parish is established if the applicant has, at the time of registration on the Housing Waiting List:

- been continuously resident within the parish, or adjoining parish, for the last 5- years
- been a person, or persons residing permanently in the parish, or an adjoining parish for 5 years, or more, within the previous 20-years
- has a contract of employment at a workplace within the parish, or adjoining parish, and this work is not of a casual or temporary nature
- current family associations within the parish, i.e. parents, sons, daughters, brothers or sisters who have lived within the parish, adjoining parish, for the last 5-years
- Someone needing care from a person in the Parish

If there is not an applicant that meets the above local connection criteria, we will adopt the following approaches, listed in order of how we will use them:

- Firstly, we will consider applicants resident in the parish, or adjoining parishes that have lived there from 4-years down to 12-months; those having been resident longest receiving highest priority
- Secondly, if there are still no qualifying applicants we will then consider those resident in the surrounding parishes, initially resident for 5 years, then if there is no suitable applicant, those that have lived there from 4-years down to 12- months; those having been resident longest receiving highest priority

Finally, if there is still no qualifying applicant in the adjoining or surrounding parishes we will consider other applicants resident within the borough initially resident for 5- years, then if there is no suitable applicant, those that have lived there from 4-years down to 12-months; those having been resident longest receiving highest priority. The Rural Allocation Policy applies to all villages and rural communities within the boundaries of the borough, with the exception of the town of Rugby and the villages of Dunchurch and Long Lawford.

New local connection and priority criteria – Revised Rural Allocations Policy

For some properties in rural settings a local connection will need to be established.

Properties may be advertised with the specific rural connection criteria required or applicants may be matched directly for an offer using the rural connection criteria.

1. People who currently live in the rural settlement and have done so continuously for at least the last two years and who require a move.
2. People who have lived in the rural settlement for at least two years out of the last 10 years.
3. People who used to live in the rural settlement and who have immediate family (mother, father, adult son, daughter, brother or sister) living in the rural settlement and have done so for at least five years.
4. People who are employed in the rural settlement in permanent paid work, and have been for at least 12 months.
5. People who have adult relatives living in the rural settlement to whom it is essential to live near in order to give or receive care or significant support. For example, elderly relatives who need help with shopping, personal care, transportation to hospital or GP appointments, young families who need help with child care or couples and single people living independently for the first time.

If there is not an applicant that meets the above local connection criteria, we will adopt the following approaches, listed in order of how we will use them:

The property will be advertised twice; and if remains unallocated will be advertised for a third time with the above criteria removed.

The Rural Allocation Policy applies to all villages and rural communities, with a population of under 3,000 within the boundaries of the borough. This is defined in this policy as a rural settlement.

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Housing Advice and Benefits
Policy/Service being assessed	Housing Allocation Policy 2025
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	New policy
EqlA Review Team – List of members	Daniel Khan
Date of this assessment	26 January 2025
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Chief Officer for Legal and Governance.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>The main aims of this proposed housing allocations policy is:</p> <ul style="list-style-type: none"> • To have a Housing Allocations Policy in accordance with the requirements of The Housing Act 1996 (Part VI) as amended. The Housing Allocations Policy determines priorities and defines the procedures to be followed in allocating social housing. • To ensure those who are most need are prioritised for social housing. • To set out who is and who is not eligible for housing, who is qualified to join the housing register and how this assessment is made. • To set out how to apply for housing. • Choice Based Lettings (CBL) <p>The key objectives of this proposed housing allocation policy are to:</p> <ul style="list-style-type: none"> • Meet the legal requirements placed on the Council to give appropriate priority to applicants who fall under the Housing Act “reasonable preference groups”. This is to ensure that social rented housing is let to those in greatest need. • Provide a fair and transparent system by which people are prioritised for social housing. • To comply with The Tenancy Standard by providing a fair and transparent system which takes the needs of tenants and prospective tenants into consideration. • Promote the development of sustainable mixed communities. • Make efficient use of our resources and those of the private registered providers with social housing stock in the Rugby area.

(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?

The proposed housing allocations policy fits with the following Corporate Priorities:

A Fair Rugby - To reduce inequalities and improve housing across the borough.

The policy seeks to reduce inequalities by:

- Determining priorities and defining procedures to be followed in allocating social housing
- Ensuring those who are most need are prioritised for social housing
- Clearly defining who is and who is not eligible for housing, and who is qualified to join the housing register and how this assessment is made
- Providing choice for people to enable them to bid for Council and Private Registered Provider homes through the Council's Homechoice portal for applicants to view and place bids on a weekly basis.

A Healthier Rugby - To support people to live healthier, longer, and more independent lives:

The policy seeks to reduce inequalities by:

- Providing Local Lettings Plans and a Rural Allocations Policy to prioritise properties to people who wish remain in their communities and who satisfy the respective lettings criteria
- Empowering applicants through the Choice Based Lettings System to express their preferences of where they wish to live and make informed choices about their housing
- Providing clear information about available properties and the selection process applicants will be able understand their options about the properties they are choosing to live in to meet their housing needs.

Appendix 4

<p>(3) What are the expected outcomes you are hoping to achieve?</p>	<p>The proposed changes to the allocations policy, underpinned by the Choice-Based Letting model, aim to create a more equitable, transparent, and effective housing allocation system.</p> <p>These changes will not only enhance the Council's response to homelessness but also align with the broader objectives of the Council's Corporate Strategy, fostering a stronger and more inclusive community.</p>
<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>The policy and the decision will affect:</p> <ul style="list-style-type: none"> • Customers – promotes the opportunity of choice in the bidding of a desired property and its location. Vulnerable customers and people unable to use technology to bid for properties will be provided with a paper version of properties available to bid for and will be supported to bid online. Use of computers and support to use them should be made available. • Employees – changes to work processes and practices will be needed from the changes to the policy and a new CBL system of allocation • Wider community or groups – the policy mainly is for individuals as opposed to the wider community generally. Groups such as veterans are prioritised for social housing.
<p>(5) Will the policy or decision involve substantial changes in resources?</p>	<p>Resources will be required for the development of the IT system to enable the changes within this report and from the proposed housing allocation policy.</p> <p>A continued resource for a consultant to implement CBL and the ongoing upkeep of the system once they have completed the task is likely to be required.</p> <p>Additional officer resources may also be needed for implementation of the IT system, transfer of data and system changes, this has not yet been fully costed as it is dependant on which changes are agreed within the policy.</p>

Stage 2 - Information Gathering

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

(1) What does the information tell you about those groups identified ?

Waiting List Information

Banding – as at 7 January 2025	Number of Applicants
Band 1/1+ (cumulative urgent need/urgent priority)	47
Band 2 (medium priority)	105
Band 3 (low priority)	211
Total	363

There are four new bands within the proposed housing allocation policy:

- 1 Urgent priority statutory housing need to move
- 2 High priority statutory high housing need to move
- 3 Moderate priority statutory moderate housing need to move
- 4 Low priority, statutory low housing need to move

Appendix 2 of the Cabinet report details the criteria for these bands. Highlighted for this EqIA and providing a positive impact are domestic abuse, violence and harassment cases and ongoing anti-social behavior which will be given urgent Band 1 priority, Private sector property that is not safe to live in, and serving personnel (and will soon leave) of the regular forces who are suffering from serious injury etc. in addition to care leavers ready for move on will also receive maximum priority.

Property Type as at 7 January 2025	Number of Applicants
General Needs	297
Independent Living	63
General + Independent	3
Wheelchair Accessible	11
Total	363

Appendix 4

The Census 2021 shows an ageing population for Rugby. Ground floor properties, independent living (sheltered and supported) as well as wheelchair accessible will be required to meet these housing needs.

Classification	2011_Rugby_%	2021_Rugby_%
85 years and over	2.4	2.4
75 to 84 years	5.6	6.6
65 to 74 years	9.4	9.2
50 to 64 years	18.3	19.2
35 to 49 years	22.4	20.6
25 to 34 years	12.6	13.6
20 to 24 years	5.2	4.9
16 to 19 years	4.9	4.1
10 to 15 years	7.5	7.6
5 to 9 years	5.6	6.2
4 years and under	6.3	5.6

The proposed housing allocation policy gives additional preference to Rugby Borough Council tenants who release a property under various criteria freeing up larger 3 and 4 bed family homes.

Bedroom Requirements	Number of Applicants
1 Bedroom	125
2 Bedrooms	82
3 Bedrooms	96
4 Bedrooms	61
4+5 Bedroom	9
5 Bedrooms	3
5+ Bedroom	2

(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?

The proposed housing allocations policy will require public consultation and statutory consultation with Registered Providers following approval at Cabinet and Council.

The stakeholders who have been consulted so far have been elected members, members of the community and relevant organisations, as well as a leading consultant in homelessness, Andy Gale.

The consultation highlighted the importance of ensuring that all applicants have a fair chance to access housing, particularly vulnerable groups, including individuals experiencing homelessness and those with complex needs. The policy has therefore been designed to give additional preference to these groups.

Feedback indicated a strong desire for the allocations policy to support the Council's commitment to addressing homelessness. Participants advocated for mechanisms that not only prioritise those currently homeless but also facilitate pathways to stable housing for individuals at risk of homelessness.

The consultation underscored the necessity of a transparent allocations process. Stakeholders expressed the need for clear communication regarding how decisions are made and the criteria used for allocations. This transparency is vital in building trust within the community and ensuring that residents feel informed and valued in the decision-making process.

In response to the feedback received, we propose to adopt a Choice-Based Letting (CBL) model as the primary allocation method. This approach aligns with our commitment to fairness and transparency while empowering applicants to take an active role in selecting their housing options.

Appendix 4

<p>(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary</p>	<p>Consultation with public and Registered Providers plus any other interested party as determined throughout the committee cycle during April and May 2025</p>		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.</p>	<p>Protected Characteristic</p>	<p>Nature of Impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>
	<p>Age</p>	<p>Neutral</p>	
	<p>Disability</p>	<p>Positive Preference is given to medical or mobility needs</p>	<p>Medium</p>
	<p>Sex</p>	<p>Positive Preference is given to children of different gender over the age of 10 years sharing a bedroom</p>	<p>High</p>
	<p>Gender reassignment</p>	<p>Positive Preference is given to a child sharing a bedroom over the age of 10 but not yet 16, and is transitioning and is receiving specific medical treatment</p>	<p>High</p>
	<p>Marriage/civil partnership</p>	<p>Neutral</p>	

Appendix 4

	Pregnancy/maternity	Positive – priority is given within homeless legislation and homelessness is a preference in the housing allocations policy	High
	Race	Neutral	
	Religion/belief	Neutral	
	Sexual Orientation	Neutral	
<p>(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how? (b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?</p>	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive as the policy seeks to provide preference to low income households and disadvantaged communities for housing.	Medium
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Positive as the new choice based letting scheme provides a choice of which property and place where the applicant wishes to live, which will support the building of stronger communities	Medium
(3) If there is an adverse impact, can this be justified?	Not applicable		

Appendix 4

<p>(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (This should form part of your action plan under Stage 4.)</p>	<p>Not applicable</p>
<p>(5) How does the strategy/service/policy contribute to the promotion of equality? If not, what can be done?</p>	<p>A fair and transparent approach to gaining preference to access housing through the policy and being allocated housing. Applications for housing capture equality monitoring data which will be analysed.</p>
<p>(6) How does the strategy/service/policy promote good relations between groups? If not, what can be done?</p>	<p>The policy aims to promote good relations between groups by clearly defining who is receiving preference for housing through the banding system. Using a choice based lettings system applicants may choose the property they wish to live in and if they have enough points through the banding system they will be allocated to the property.</p>
<p>(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?</p>	<p>There are some barriers associated with skills to access the website to make bids. They will be overcome through a customer support role of providing a paper version of properties which are coming available to bid for and help to make bids either in person, website chat or on the phone. The housing advice and support team and help from charities supporting people will be available. There may be a need for interpretation services.</p>
<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
	<p>Reliable data is crucial in understanding housing needs, to enable the Council to meet housing needs through its own investment or by directing developers and Registered Providers through the planning system to build the size and types of homes required to meet those needs.</p>

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	EqlA Action Plan				
<p>(2) Review and Monitoring State how and when you will monitor policy and Action Plan</p>	<p>The policy and its implementation is required to be kept under review. An annual review should be prepared for Cabinet.</p>				
	Action	Lead Officer	Date for completion	Resource requirements	Comments
	Staff training on the new policy	Matthew Taylor	2025	Existing resources	
	Staff training on the new CBL system	Matthew Taylor	2025	Existing retained consultant and existing resources	
	Statutory Registered Provider consultation on the policy	Daniel Khan	April/May 2025	Existing resources	
	Public Consultation on the policy	Daniel Khan	April/May 2025	Existing Resources	

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’

Amendments and Additions to the Council’s Housing Allocation Policy – Appendix 5

5.5 Rural Allocation Policy

5.6 To provide clarity and ensure that housing in rural areas are allocated to those with strongest local connection to the rural areas, a new criteria for allocating properties is set out at appendix 3.

5.7 The new criteria aims to logically prioritise applicants in descending order based on the ‘strength’ of their connection with the village or rural settlement village where there is a new development or a vacancy occurs.

5.8 Overcrowding and Bedroom size

5.9 When assessing overcrowding and size of home, the Council will take into consideration gender and overcrowding due to a child over the age of 10 but not yet 16, and is transitioning and is receiving specific medical treatment is outlined in the policy.

5.10 Banding System and Reasonable Preference

5.11 The proposed housing allocations policy simplifies and creates a transparent banding arrangement by introducing four amended queues with an additional band (Band 4) for applicants assessed as having low priority and low housing need. See table below:

Band	Current Policy	Band	Propose Policy
+1	Cumulative urgent housing need or covered by Military Covenant	1	Urgent priority statutory housing need to move
1	Those with urgent housing need		
2	Those with a high housing need	2	High priority statutory high housing need to move
3	Those with a moderate housing need	3	Moderate priority statutory moderate housing need to move
		4	Low priority, statutory low housing need to move

5.12 Applicants with multiple housing needs within the same Bands will be granted additional priority and placed on top of the shortlist for that Band, based on their cumulative housing need.

5.13 Banding Criteria

5.14 To promote transparency and provide clarity the proposed housing allocation policy provides new banding criteria. For details, please see Appendix 2.

Current Policy		Proposed Policy	
1	Hardship Grounds	1	Welfare and hardship needs
2	Welfare Grounds		
3	Violence and serious Harassment	2	Domestic abuse, violence and harassment
4	Homelessness	3	Homelessness or risk of homelessness
5	Medical / Disability	4	Medical or mobility needs
6	Overcrowding and Size Criteria	5	Overcrowding and size
7	Condition of current property	6	Disrepair and poor housing conditions
8	Under occupation	7	Management need
9	Serving / Former members of the Armed Forces	8	Armed forces
10	Thos leaving short term Supported Housing	9	Ready for move on

5.15 Refusal of Suitable Offer

5.16 The current process for reviewing priority and considering an application as 'withdrawn' in the absence of justifiable reasons for refusing 2 offers of suitable accommodation will be revoked.

5.17 Under the proposed housing allocation policy, where applicants refuse 2 offers of suitable accommodation, they will be removed from the housing register for 12 months unless there has been any material change during the 12-month period rendering the offers of accommodation no longer suitable.

5.18 Applicants who have been accepted as statutorily homeless and refuse the 1 offer of suitable accommodation, the Council in line with its homelessness review procedure will discharge its homelessness duty and the applicants will lose their priority banding 'due to homelessness duty owed by the Council'.

5.19 The Council will re-assess their applications and in case of any presenting housing need as defined by the policy, applicants will be placed in the appropriate band and owed a second suitable offer. Where there is no housing need, they will be removed from the housing register.

5.20 Non Qualification Rules and Residential Connection

5.21 The criteria to have lived in the borough for 3 out of the last 5-years remains.

5.22 The criteria on the duration of contract employment have been increased from 6 to 12 months.

5.23 The criteria on 'zero hours' contract have been amended. The requirement to have *worked in the borough during the previous 4-weeks* have been replaced with working 16 hours per week on permanent 'zero-hours' contract, based on average of over a 3-month period.

5.24 Clarifications on self-employment are provided at para 2.3 of the proposed housing allocation policy.

5.25 Exceptions to Residential Connection Rule

5.26 The proposed housing allocation policy introduces additional circumstances where exceptions to the residential connections criteria will be made. They are as set out in para 1-8 section 2.3 of the proposed policy but include:

5.27 Non-residents at the date of application due to:

- Receiving medical or respite care, or
- Serving a custodial sentence and is imminently due to be released, or
- In another type of institution e.g. mental health, refuge, rehabilitation.

5.28 In these circumstances the applicant must have been living in Rugby for at least 12 months prior to their current circumstances.

5.29 Unacceptable Behaviour

5.30 A detailed section provides grounds for disqualification on the basis of unacceptable behaviour and conditions for exclusion and re-application.

5.31 The following conditions subject to specific periods have been changed:

- Criminal offence related to property or vicinity of property within 2 years preceding the date of application;
- Criminal offence considered by the Council serious enough for the applicants to be a risk to other tenants in the last 10 years; and
- Civil/criminal actions or sanctions relating to tenancy or property within the last 5 years.

5.32 Sufficient Financial Resources

5.33 Non qualifying rule on household income has been amended as follows:

	Current Policy	Proposed Housing Allocation Policy*
Couple or single person with children	Gross £54,990+	Gross £55,000+
Single person without children	Gross £30,500	Gross £32,000+
Have savings (in line with UC and HB)	£16,000+	£16,000+

5.34 Other notable changes in terms of income assessments include the following:

- Income from dependent and/or non-dependent adult children will be considered

- Only the income of the applicant, their partner or joint applicants will be considered.

*Income levels will increase in line with CPI per annum.

5.35 Housing Related Debt

5.36 The provision to reduce priority banding by 2 bands where the applicant fails to maintain repayment arrangement has been withdrawn and replaced with new conditions in the proposed housing allocation policy.

5.37 The proposed housing allocation policy provides detailed information on circumstances which constitute housing related debt and outlines the following thresholds to determine if the level of debt is permissible. Applicants with debts:

- over £2,000 will be automatically be disqualified unless the debt is reduced or a repayment plan is being adhered to;
- between £501- £1999 will be eligible to join the housing register unless the debt is reduced or a repayment plan is being adhered to;
- for housing-related debts of £1 - £499 an applicant will still be considered for an offer of accommodation with no penalty.

5.38 However, they will be suspended from being able to bid or considered for an offer of property until have made repayment commitments as per below:

- 6 months where the debt is £1,000 or over
- 3 months where the debt is between £500 and £999
- There are no penalties for housing related debts between £1-£499.

5.39 The proposed housing allocation policy also elaborates on applicants renting in the private sector and rules on debts owed to previous landlords within the last 5 years.

5.40 False information

5.41 The period of exclusion from the housing register on the basis of false or misleading information will be reduced from the stated 2 year period to 12 months.

AGENDA MANAGEMENT SHEET

Report Title: Homelessness Strategy and Action Plan 2025-2029

Name of Committee: Cabinet

Date of Meeting: 4 March 2025

Report Director: Chief Officer - Communities and Homes

Portfolio: Communities and Homes, Regulation and Safety

Ward Relevance: All

Prior Consultation: Rugby Homelessness Forum; Elected Members (email consultation); Portfolio Holder; Liberal Democrat housing representative and the meeting of Scrutiny Committee held on 19 November 2024

Contact Officer: Dan Khan - Housing Advice and Benefits Team Manager (daniel.khan@rugby.gov.uk)

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)
[Corporate Strategy 2021-2024](#)
 This report does not specifically relate to any Council priorities but

(C) Climate
(E) Economy
(HC) Health and Communities
(O) Organisation

Summary: The report proposes a new borough wide Homelessness Strategy for 2025-29.

The strategy (appendix 1), which is a statutory requirement, will be underpinned by an annual action plan, the development of which will align with annual budget setting and be implemented in partnership with the borough wide Homelessness Forum.

Financial Implications:

The Homelessness Prevention Grant (HPG) is an annual grant given to Local Authorities to support their homelessness prevention services.

The grant is ringfenced for activity relating to the prevention and relief of homelessness, targeting those most in need and to ensure local authorities are resourced to continue to implement the requirements of the Homelessness Reduction Act 2017.

The 2024/25 grant allocation for Rugby was £336,000, a 4% increase from the previous year. The Council also received a top up grant of £166,600 for 2024/25 that is subject to the same conditions as HPG.

Risk Management/Health and Safety Implications:

The proposed Homeless Strategy 2025-2029 sets out how we will support households who are likely to or have become homeless. We will manage risks of homelessness through early intervention and support. Offer tailored support to help people access relevant services. Advise on a range of housing options in both the social and private housing rented sectors. And work with our partners across the statutory and voluntary sector to secure the best outcomes for customers.

These actions will be monitored through our statistical returns to central government and through a new housing steering group.

Environmental Implications:

Whilst there are no direct environmental implications arising from this strategy. It is worth noting that the Council's Severe Weather Emergency Protocol (SWEP) provides emergency accommodation during severe weather (during extremes of both hot and cold) to those who sleep rough.

Placements are also provided through the Pathways project, year-round, with an increase in

provision during winter, so that rough sleepers can access accommodation and support, with a view to becoming equipped to maintain a future tenancy.

Legal Implications:

The 2002 Homelessness Act places a duty on Local Authorities to prepare a Homelessness Strategy based on a review of homelessness in their area. The strategy must be renewed every 5 years.

Equality and Diversity:

An Equality Impact Assessment has been completed and forms appendix 2 to this report.

Options:

1. Adopt the proposed strategy and action plan
2. Reject the proposed strategy and action plan and commission officers to present a revised version for consideration at a future meeting of Cabinet.

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT:

1. The Rugby Homelessness Strategy 2025 – 2029 and action plan (Appendix 1) be adopted; and
2. delegated authority be given to the Chief Officer (Communities and Homes) to update the Action Plan on an annual basis, in consultation with the Portfolio Holder for Communities and Homes and the Rugby Homelessness Forum.

Reasons for Recommendation:

The Council complies with the statutory requirement to publish a localised strategy setting out how it will address and prevent homelessness and rough sleeping in the borough.

Aligning an annual refresh of the action plan to the budget setting process will ensure that resulting actions will be deliverable.

Cabinet - 4 March 2025

Homelessness Strategy and action plan 2025-29

Public Report of the Chief Officer - Communities and Homes

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT:

1. The Rugby Homelessness Strategy 2025 – 2029 and action plan (Appendix 1) be adopted; and
2. Delegated authority be given to the Chief Officer (Communities and Homes) to update the Action Plan on an annual basis, in consultation with the Portfolio Holder for Communities and Homes and Rugby Homelessness Forum.

1. Executive Summary

- 1.1 The Council has a statutory duty to publish a localised strategy setting out how it will address and prevent homelessness and rough sleeping in the borough. It also should, as good practice prepare an annual refresh of an action plan and align this to the budget setting process to ensure that resulting actions will be deliverable.
- 1.2 A collaborative approach has been taken to form this Rugby Homeless Strategy 2025-2029 with support and engagement from Rugby Homeless Forum, elected members and the government department for the Ministry of Housing, Communities and Local Government.
- 1.3 The cost of living, impacts of Covid-19 and hidden homelessness have been identified as areas of concern the Rugby Homeless Strategy 2025-2029 will need to focus upon through its aims detailed at section 5 and monitored through a newly established housing steering group.

2. Introduction

- 2.1 The 2002 Homelessness Act places a duty on Local Authorities to prepare a Homelessness Strategy based on a review of homelessness in their area. The strategy must be renewed every 5 years.
- 2.2 The proposed Homelessness Strategy 2025-29 has been developed in collaboration with the Rugby Homelessness Forum (a range of partners that seek to assist and prevent homelessness and rough sleeping in the borough) during mid and late 2024 and also during early 2025.

- 2.3 The strategy will be supported by an annual action plan which will be updated on an annual basis, in collaboration with the Rugby Homelessness Forum, and this will coincide with annual budget setting to ensure that resources are in place to deliver.
- 2.4 The strategy is also reflective of the objectives of the newly adopted corporate strategy as it seeks to deliver A Fair Rugby and supports efforts to reduce inequalities in the borough.
- 2.5 The most recent homelessness strategy for the borough was as part of a county wide one - *Preventing Homelessness in Warwickshire: a multi-agency approach* (2021). This was a collaborative effort between the district and borough councils as well as the county council. This was in response to the fundamental changes introduced by the Homelessness Reduction Act 2017 in the way Local Authorities assess and assist homeless applicants with a strong focus on prevention and a duty to refer.
- 2.6 The collaborative working continues across the county, with a statement of intent and an action plan due to be produced in 2025 with the help of all the district and borough councils. We are all reverting to delivering an individual homelessness and rough sleeping strategy, which is in keeping with the 2002 legislation requirements and is local to the borough, concentrating on meeting our own specific homelessness and housing needs.

3. Collaboration in the development of the Rugby Homelessness Strategy 2025-29

- 3.1 The strategy has been developed in consultation with the following key stakeholders represented in Rugby Homelessness Forum:
 - Homeless Link
 - P3 Charity
 - Hope4 Charity
 - CGL (Change, Grow, Live)
 - Doorway
 - Futures Unlocked
 - Together UK
 - Rugby Job Centre (DWP)
 - Registered Providers
- 3.2 Elected Members were invited to comment and offer feedback on the broad aim of the strategy and the proposed priorities via an email consultation. This same consultation also invited ideas for inclusion in the action plan.
- 3.3 In keeping with legislative requirements and published best practice from the Local Government Association (*Making homelessness Strategies Happen*), a similar consultation took place with resulting input coming from public health and social services as well as the housing teams' central government advisor from the Ministry of Housing, Communities and Local Government (MHCLG).

3.4 The draft strategy was also presented to the Scrutiny Committee meeting on 19 November 2024. This was a further opportunity for Members to influence its development, having ensured that all Members had previously been consulted on the priorities via email, at the beginning of the strategy development. Comments and feedback were provided and incorporated into the proposed strategy. Items were raised on cost of living, impact of Covid-19 and hidden homelessness. Assurances were given that the Action Plan would address these issues alongside the proposed Housing Steering Group that will oversee implementation of the strategy as detailed in the Action Plan.

4. Continuing to collaborate with partners at a county level

4.1 During 2025, a county wide action plan will be developed alongside a new shared statement of intent, to ensure that the collaborative working between the districts, boroughs and with the Public Health Team continues to develop and prosper.

4.2 This is of particular importance when considering the recently published '*Independent investigation of the national health service in England*' (September 2024: the Right Hon. Professor the Lord Darzi of Denham), which cited homelessness as being a *public health catastrophe* (page 68).

5. Priorities of the new homelessness strategy

5.1 The overarching objective is to reduce homeless and sitting under this are 4 overarching priorities that are aligned with national priorities for addressing homelessness:

Prevention of homelessness – early intervention and support to help service users remain in their existing home and reduce the number of approaches to the Housing Advice Service to households who are in crisis.

Tailored support for our most vulnerable clients – work with partners to provide bespoke support to access relevant services and work with service users to develop and maintain independent living skills.

A variety of accommodation options to meet specific customer needs – deliver a range of housing options in both the social and private housing rented sectors.

Work with our partners across the statutory and voluntary sector to secure the best outcomes for clients – strengthen partnership working especially with Public Health to pool resources and co-ordinate services to overcome inequalities and gain positive outcomes

6. Performance Monitoring and the Delivery Plan

6.1 The Rugby Homelessness Forum and the proposed Housing Steering Group will monitor the recommended Action Plan quarterly and review the plan annually to reflect any developments and changes in legislations, practices and local service needs. The Rugby Homelessness Forum is a multiagency meeting set whose remit is to create a collaborative framework to address

homelessness in Rugby. The Housing Steering Group is a key objective of the homelessness strategy action plan which has a more specific purpose to monitor the delivery of the key objectives of the homelessness strategy. Its overall goal is help develop and create comprehensive and inclusive approach that addresses immediate and long housing and homelessness. Both groups will work in collaboration to ensure its objectives are met.

- 6.2 Yearly reviews and updating of the Action Plan will also be completed in consultation with the portfolio holder for Housing and Communities.
- 6.3 The Housing Advice and Benefits Team is pivotal in providing advice, conducting initial assessments for every household that approach the service regarding homelessness and processing homeless applications. To ensure performance is on par with industry standard, performance will be benchmarked and monitored using MHCLG Homelessness Case Level Information Collection (H-CLIC) Performance indicators.
- 6.4 This will also contribute towards Rugby's performance on the *Thriving Places Index (TPI)*, a set of indicators that measure the local conditions for wellbeing and whether they are being delivered fairly and sustainably. Housing's current TPI score is 4.78, which is similar to England on average.

7. Successes in tackling homelessness in Rugby over the last 5 years

7.1 Increased partnership working:

- Countywide Housing & Hospital Liaison Service improved working practices between the Council and local hospital by addressing patients' housing needs in advance. From April 2024 to date we've assisted with 19 hospital cases ensuring timely and adequate responses to help vulnerable people return to their homes with support and adaptations, or helping to secure more suitable alternative accommodation. This helped prevent delays and enable timely hospital discharges.
- Successful bidding secured £400,000 Rough Sleepers Initiative funding which enabled the expansion of the Outreach Team and development of Rugby Pathway Scheme which supported and provided accommodation to 33 people who are sleeping rough.

7.2 Increased supply of accommodation to meet temporary and permanent housing needs:

- New Private Sector Leasing Scheme, administered by the council bringing additional 32 properties into the portfolio of temporary accommodation.
- Completed review of Property Acquisition and Disposal Policy and delivery of additional 159 property acquisitions helping to increase the Housing Revenue Account housing supply to meet needs. The property breakdown for these acquisitions is as follows:

Property type	Number
1 bed	36
2 bed	75
3 bed	39
4 bed	9

7.3. Prevention and Relief

- Homelessness was either prevented or relieved for 796 households through mediation, financial assistance or securing accommodation the private or social rented housing.
- New Tenancy Coach scheme supported 429 tenants on a range of areas including income maximisation, utility setup and financial assistance.
- 86% of the households placed in temporary accommodation spent less than 6 months in TA between 2019/20-2023/24. The maximum length of stay of 6 weeks in B&B for all 134 households with children was met.

8. An overview of homelessness in Rugby 2019/20 – 2023/24

- 8.1 The number of households assessed as statutorily homeless (is assessed homeless or threatened with homelessness within 56 days) per year has been steady over the last 4 years, between 311 to 336 households.
- 8.2 The number was notably higher (546) in 2019/20 around the Covid period. Although the level of homeless presentations all of whom receive an initial assessment has dropped from 2,265 to 1,204 over the last 5 years, the number of households who are statutorily homeless remained below 29% of all approaches.
- 8.3 Following initial assessments, 36% of the households were owed a Prevention Duty, who were threatened with homelessness within 56 days. A further 86% of households were owed a Relief Duty, who were already homeless. And the main duties have significantly dropped because of proactive work to prevent homelessness through support by the service to find accommodation.
- 8.4 The top 3 reasons for loss of last settled home or threat of homelessness were due to –
- Family or friends no longer willing or able to accommodate (30%),
 - End of private rented assured shorthold tenancy (20%), and
 - Domestic abuse (12%).
- 8.5 54% (1,016) of the homeless households had support needs, mainly mental health issues, problems, followed by physical ill health and disability and at risk of or have experienced domestic abuse. The majority of the applicants were also single adults. Single adults (61%) and Single parents with dependent children (27%) were the 2 most common household types accepted as statutorily homeless.

- 8.6 In terms of the profile of households accepted as statutorily homeless:
- (29%) were between 24-34 years old followed by those fell within the 18-24 (22%) and 35-44 (22%) age brackets.
 - 85% were UK nationals and described their ethnicity as White (84%).
 - 38% were registered unemployed; and
 - 29% were in either full or part-time employment.
- 8.7 The average number of people who are sleeping rough and supported by the Council and its partners per month has increased fourfold, from 2 rough sleepers in 2021/22 to 10 in 2023/24.
- 8.8 The latest release on Rough Sleeping Snapshot in England: Autumn 2023, shows that the number of people sleeping rough in a single night has increased regionally and nationally for a second year in a row. Although Rugby has experienced a reduction, the latest count of 13 rough sleepers at the time of developing this strategy shows that the number of people sleeping rough has more than doubled since the last count in 2023 (4) and has also exceeded the peak of 11 in 2019.
- 8.9 Based on the last 3 counts on a single night in Rugby, the majority of people who sleep rough are likely to be men, between 26-40 years of age and are mainly UK or EU nationals.

9. Conclusion

- 9.1 The proposed new Rugby Homelessness Strategy builds on the successes and partnerships built over the course of the previous Homelessness Strategies.
- 9.2 It paves the way for the Council to continue to work with its statutory and voluntary organisation partners by coordinating activities, sharing best practice and learning to effectively address homelessness in the borough.
- 9.3 Work will continue at a county level to maximise collaboration with Warwickshire Public Health to address health inequalities and achieve positive health outcomes for those who are homeless or at risk of homelessness.
- 9.4 The regular monitoring of the strategy action plan developed in consultation with key partners will ensure delivery of the proposed new homelessness strategy.
- 9.5 The annual review of the strategy action plan will ensure that resource is aligned to delivery

Name of Meeting: Cabinet

Date of Meeting: 4 March 2025

Subject Matter: Homelessness Strategy and Action Plan 2025-2029.

Originating Department: Communities and Homes

DO ANY BACKGROUND PAPERS APPLY **YES** **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
6	Minutes of Scrutiny Committee 19 November 2024 https://www.rugby.gov.uk/documents/20124/7291461/SC19NOV2024+Minutes.pdf/80b805ff-4ee8-696f-720c-668282d9c183?version=1.0&t=1734960140917

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Draft Version 23.01.2025

Rugby Borough Council Homelessness & Rough Sleeping Strategy

2025 – 2029

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Foreword

I am delighted to present the new Homeless Strategy on behalf of Rugby Borough Council (RBC) for the period 2025 – 2029.

Firstly, I would like to thank the hard work of RBC staff and officers who work so hard to provide support for the most vulnerable of our residents. This is a pivotal time for the provision of housing in this country, with a new national government drive to increase housing delivery, and as the administration at RBC , continues to embed and deliver its corporate strategy vision, I am very conscious that these issues will align to alleviate the detrimental impact of homelessness on our community.

Working in partnership is key to delivery of the new strategy and we must acknowledge the hard work of our partners in alleviating the impact of not having a proper place to call home on so many people in our wider community.

We are making good progress to reduce the number of main duty homeless acceptances accepted under section 193 of the Housing Act 1996 (as amended) through proactive prevention work, and as we increase the supply of affordable housing by providing 100 new council owned homes at the newly named Navigation Way on the site of the former Biart Place (which will be ready for occupation in early 2026) we are reducing costs to the council from having to use temporary accommodation.

We will also refresh the Housing Allocations Policy in 2025 which sets out the eligibility criteria for households, who are in housing need, to access social housing. The creation of a new landlords' forum of private rented sector landlords will provide an opportunity to work more closely with local landlords and in doing so will seek to deliver further housing solutions for those in need.

We want to continue to work with other housing providers, both Registered Providers and the private sector to provide good quality, affordable housing that meets residents needs across the Borough whether in the town or in our parishes and villages. Tackling inequality is a key feature of our new Corporate Strategy 2025-35 and this strategy is one of many ways in which we will deliver it.

My thanks to everyone who is preparing and delivering this strategy and its implementation and to Cllr Noreen New, the Liberal Democrat lead on Housing.

Introduction

Local Authorities have statutory duties to assist people who are homeless or threatened with homelessness. Appendix 2 provides an explanation of these duties. Part 7 of the Housing Act 1996 defines someone as 'homeless' if there is no accommodation available for their occupation, or if it is not reasonable for them to continue to occupy the accommodation they have. A person is threatened with homelessness, if it is likely that they will become homeless within 56 days or have been issued an eviction notice under Section 21 of the Housing Act 1988, which is due to expire within 56 days. Homelessness legislation and the Code of Guidance shape the way homelessness services are designed and delivered by Local Authorities.

The Government funding arrangement for statutory homelessness duties include a combination of the Homelessness Prevention Grant, Housing Benefit Temporary Accommodation Subsidy reimbursed by the Department for Work and Pensions (DWP) and the Local Government Finance Settlement. There are also other programmes available which allocate or receive bids from Local Authorities for funding such as the Rough Sleeping Initiative.

Both individual and structural factors can cause or exacerbate homelessness. These factors are often interrelated and reinforced by one another. On the individual level issues such as relationship breakdown, mental health problems, substance misuse and experience of violence, abuse and neglect can lead to homelessness. On structural level poverty, inequality, unemployment, housing supply and affordability can lead to or compound homelessness.

Due to multiple disadvantages faced by homeless households across various policy areas such as housing, health, education, welfare benefits, social care, migration, crime and employment it is imperative that homelessness is addressed with a joint and multi-agency approach. In line with Rugby Borough Council Corporate Strategies key objectives that Rugby Borough Council is a responsible, effective and efficient organization to help residents live healthy, independent lives, with the most vulnerable protected.

The new strategy builds on the successes and partnerships built over the course of the previous Homelessness Strategy 2015-18 and paves the way for the Council to continue to work with statutory and voluntary organisation partners by coordinating activities, sharing best practice and learning. Also, by maximizing on collaborations with Warwickshire Public Health and partnerships for Safe Accommodation and Violence Against Women and Girls (VAWG) the Council can address health inequalities, achieve positive health outcomes and provide access to safe accommodation for those who are homeless or at risk of homelessness in the borough.

The Council is a member of the **Warwickshire Homelessness Strategic Group** formed in 2019 in response to the fundamental changes introduced by the Homelessness Reduction Act 2017 in the way Local Authorities assess and assist homeless applicants, with a strong focus on prevention. This officer group is non statutory and commissions countywide homelessness services and reports to the statutory Warwickshire Health and Wellbeing Board. It also published a *Preventing Homelessness in Warwickshire: a multi-agency approach* in 2021 focusing on health, financial inclusion, young people, domestic abuse and offending.

The **Rugby Homelessness Forum** brings together local statutory and voluntary organisations to prevent and tackle homelessness in the borough. The Forum provides a platform for partners to collaborate, develop and promote solutions to issues affecting those who are homeless or at risk of homelessness in Rugby. This multi-agency partnership has helped shape this strategy and will play a crucial role in delivering it over the next five years.

The **Rugby Homelessness Strategy 2025 – 2029 Action Plan** will be monitored quarterly and reviewed annually by the Council and its partners to deliver on the following priorities:

- *Prevention of homelessness*
- *Tailored support for our most vulnerable clients*
- *A variety of accommodation options to meet specific customer needs*

Warwickshire Homelessness Strategy Group

- Warwickshire County Council, Social Care and Public Health
- North Warwickshire Borough Council
- Nuneaton & Bedworth Borough Council
- Rugby Borough Council
- Stratford-on-Avon District Council
- Warwick District Council
- Warwickshire Police
- Probation

Rugby Homelessness Forum

- Rugby Borough Council
- Homeless Link
- P3 Charity
- Hope4 Charity
- CGL (Change, Grow, Live)
- Doorway
- Futures Unlocked
- Together UK
- Rugby Job Centre (DWP)

Work with our partners across the statutory and voluntary and community sector to secure the best outcomes for clients

Our Partners

- Platform Housing
- SAGE Housing
- Warwickshire Rural Housing
- WHG
- Sanctuary Housing Association
- PA Housing

Housing Delivery Partners (cont)

Housing Delivery Partners

- Rugby Borough Council
- London and Quadrant Housing Trust
- Bromford Housing
- Citizen
- Clarion Housing
- Heylo Housing
- Midland Heart
- Orbit Homes

Our achievements over the last 5 years

2022-2024

Warwickshire

Homelessness Strategy Group

Was formed in 2019 providing a platform for a joined-up approach to tackling homelessness on a county and local level.

Homelessness Reduction Act 2017 (HRA)

Full implementation of the HRA 2017 legislation embedding the early intervention and prevention approach into service delivery and new responsibilities introduced by the Act.

Statutory Duties

The Council successfully ended duties to 796 (42%) households who were owed a Prevention or Relief Duty by helping them to remain in existing accommodation or securing accommodation in the social or private rented sector

Main Duty Owed

The number of applicants to whom the Council owes Main Duty has declined by 84% over the last 5 years due to the successful outcomes preventing homeless through Prevention and Relief Duties

New Homes

4,852 homes were delivered. Of which, 1,033 were affordable (21%). The Council will continue to seek 20%-30% of all new homes to be affordable, where the sites meet the thresholds outlined in the Local Plan.

Private Sector Housing Leasing Scheme (temporary accommodation)

231 properties have been leased, increasing the range of housing options available to customers which also helped raise property standards in the private sector and bring empty properties back

Property Acquisition and Disposal Policy

Completed 105 property acquisitions over the last 5 years, increasing the housing supply for applicants on the Housing Waiting List.

Length of Stay in Temporary Accommodation (TA)

86% of households placed in temporary accommodation spent less than 6 months in temporary accommodation between 2019/20-2023/24. The maximum stay of 6 weeks for all 134 households with children in B&B was also

Housing & Hospital Liaison Service

This service enables timely hospital discharge by providing housing related support ensuring patients have access to suitable and safe accommodation upon discharge.

Rough Sleepers Initiative (RSI) Funding 2022-25

Secured £400K delivering positive outcomes including expansion of the Housing Outreach Team and a new Rugby Pathway Scheme which supported and provided accommodation to 33 rough sleepers.

Next Step Accommodation Programme (NSAP)

Part of MHCLG 'Everyone In' initiative helping rough sleepers supported during pandemic to remain off the streets by providing accommodation and support. The funding helped support 15 rough sleepers into accommodation.

Early Intervention - Outreach

Since April 2023, Outreach Officers engaged with 139 customers during multiple surgeries held at various partner venues including the Food Bank, Job Centre

Tenancy Ready

Tenancy Coach, a new innovative support programme assisted 429 tenants on a range of areas including income maximisation, form filling and utility set up since its inception in December 2022.

Impact of homelessness

The impact of homelessness especially on health have been documented in various studies including the publication by Shelter in 2004, *Sick and Tired - The Impact of Temporary Accommodation on the Health of Homeless Families* and the most recent report on the *Independent Investigation of the National Health Service 2024 (by ARA DARZI, Paul Hamlyn Chair of Surgery, Imperial College London Consultant Surgeon & Independent Member of the House of Lords)* which identifies significant health inequalities faced by homeless households in temporary accommodation and those who are rough sleeping.

The stress of not having a secure home often combined with poor living conditions, inappropriate for the health and social needs of the household, impact both physically and mentally. Homeless households living in temporary accommodation are far more likely to be vulnerable to diseases such as bronchitis and tuberculosis, and existing physical health conditions such as asthma, are often exacerbated. Depression, increased visits to doctors or hospitals, negative impact on children's education and development are also documented.¹

People who are rough sleeping are particularly vulnerable. They *experience some of the most severe health inequalities and report much poorer health than the general population. Many have co-occurring mental ill health and substance misuse needs, physical health needs, and have experienced significant trauma in their lives.*² Studies in the 2024 report above found 64% of homeless hospital inpatients had three or more physical health co-morbidities and 82% had a mental health diagnosis.

The longer a person spends rough sleeping, the more complex their needs become. Rough sleeping over a long period leads to a higher likelihood of premature death. The average age at death of people who experience homelessness is 45.4 years for men and 43.2 years for women.³

The proposed new '**ending homelessness unit**' with a cross-government taskforce which will produce a long-term cross-government strategy to address homelessness is welcome. This will enable a multifaceted approach to address homelessness where households face multiple exclusions and challenges in accessing services.

In recent years household finances have been significantly hit by **the cost of living crisis**, driven by high levels of inflation, increasing living costs and steep increase in the cost of fuel. The impact of the crisis is disproportionately felt by those who are already struggling

¹ Shelter, *The impact of homelessness and bad housing on children's education*, November 2020.

² Guidance- Health matters: rough sleeping Updated 11 February 2020

³ Office for National Statistics Deaths of homeless people in England and Wales: 2021 registrations

financially and who are therefore at a greater risk of homelessness. This has led to increased pressure on Council's homelessness and other services and is expected to continue. Going forward, working in partnership with statutory services and the voluntary sector will be key to address pressures and challenges to service delivery.

Legislation Update

There have been several legislative updates during the period of the Council's last homelessness strategy. This has changed the way the Council's homelessness services are delivered. With the new government in place since July 2024, other changes are expected to follow during the lifetime of this new strategy. Key changes that have (and continue to) shaped the way homelessness services are provided and potential new provisions that are likely to make an impact are as follows:

The Homelessness Reduction Act 2017 imposed new duties on local authorities requiring statutory homelessness services to focus on prevention of homelessness with a more person-centered and collaborative approach. It includes:

- New duties called Prevention Duty and Relief Duty requiring Councils to take reasonable steps to help eligible applicants regardless of their priority to prevent homelessness within 56 days or if they are already homeless help them secure suitable accommodation;
- Requirement to carry out an assessment and create personalised housing plan;
- Duty on public bodies to people who they know are threatened with homelessness; and
- Right of applicants for a review of any part of the legislation.

The Tenant Fees Act 2019 aims to reduce costs in the private rented sector by capping tenancy deposits and introducing 'permitted' fees that landlords and agents are allowed to charge tenants.

Domestic Abuse Act 2021 introduces a statutory definition emphasising that domestic abuse is not just physical violence, but can also be emotional, controlling or coercive, and economic abuse. The Act also grants homeless victims of domestic abuse automatic priority need status for homelessness assistance.

It also places a duty on Local Authorities to provide accommodation-based support to victims of domestic abuse and their children in refuges and other safe accommodation. In addition, the Act protects the victim's secure lifetime or assured tenancy when being rehoused by social landlords.

Renters' Rights Bill 2024 seeks to create a fairer and more secure private rented sector. It aims to abolish Section 21 of Housing Act 1988 also known as 'no fault' evictions. The landlords instead will be required to provide tenants with 'reasonable' grounds for ending their tenancy e.g. breaking rental agreement and change of use. Amongst many other provisions, the bill also includes:

- A new Private Rented Sector Landlord Ombudsman;

- Making it illegal for landlords and agents to discriminate against prospective tenants in receipt of benefits or with children;
- End the practice of rental bidding by prohibiting landlords and agents from asking for or accepting offers above the advertised rent;
- Apply the Decent Homes Standard and Awaab's Law to the private rented sector, and;
- Strengthen local authority enforcement.

An expected reform of the **National Planning Policy Framework** will place more emphasis on presumption in favour of development with mandatory target for 1.5 million homes nationally for the next 5 years.

National Context

The latest Crisis Report December 2023 into the scale of homelessness found that there were 309,000 homeless people in England. This is based on recorded homelessness by Local Authorities on households living in temporary accommodation and those who are rough sleeping. During 2023/24, local authorities recorded around 336,000 (out of 348,000) households who were owed statutory homelessness duties by Local Authorities following initial homelessness assessments.

In England, the number of households owed a homelessness duty has increased by 36,520, an 11% increase over the last 5 years. The main reasons for loss of home or being threatened with homelessness include *Family or friends no longer willing or able to accommodate, End of private rented tenancy (assured shorthold), Domestic abuse and Non-violent relationship breakdown with partner*. The proportion of homeless households owed a duty and needing support has also increased (by 41,710) from 46.6% in 2019/20 to 54% in 2023/24. History of mental health problems and physical ill health and disability are the most common support needs cited by households owed a duty.

The latest government release⁴ on rough sleeping snapshot in England estimated that 3,989 people were sleeping rough on a single night in Autumn 2023.⁵ An increase by more than a quarter for two years in a row. Of the total 82% were men, 82% were over 26 years of age and 62% were from UK.

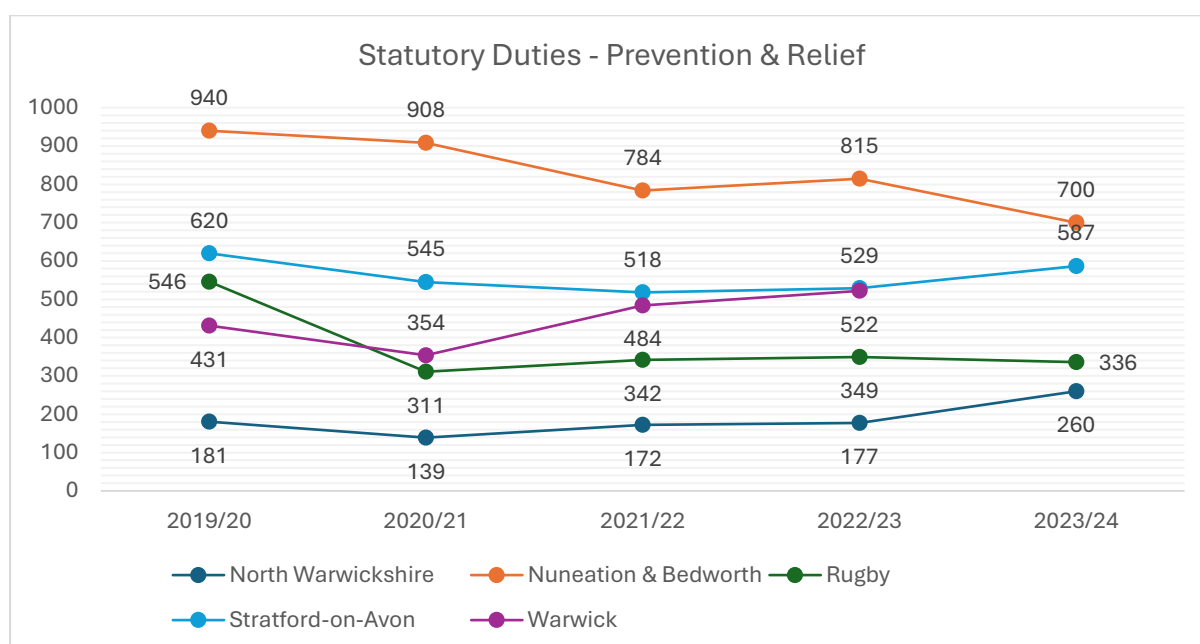
⁴ Rough sleeping snapshot in England: autumn 2023

⁵ At 4,751, the number of people sleeping rough reached its peak in 2017.

Local context

The chart below illustrates the number of households owed a Prevention or Relief Duty following initial assessments across Warwickshire over the last 5 years. Notably, the beginning of the period was marked by the Covid pandemic in 2019. Rugby, like all boroughs in the County experienced a significant number of households owed a duty during 2019/20. Of the 2,874 applications assessed across the County, 95% (2,718) were owed a Duty. 20% (567) of which were owed by Rugby.

However, in Rugby, following a sharp drop (43%-243) since 2019/20, the number of households owed a Duty following initial assessments has remained stable with an average of 335 households owed a duty per year.⁶



The top 3 reasons for loss of last settled home or threat of homelessness were due to family or friends no longer willing or able to accommodate (30%), end of private rented assured shorthold tenancy (20%) and domestic abuse (12%). Households owed a Prevention Duty were mainly threatened with homelessness due to end of private rented tenancy, whilst those who were already homeless and owed a Relief Duty mainly lost their homes due to family or friends no longer willing or able to accommodate or are fleeing from domestic violence.

A significant proportion of households owed a statutory duty were Single Adults (61%) or single parent with dependent children (27%). 29% were between the age 24 and 34. A majority of the main applicants reported their ethnicity as 'White' (84%). 38% (721)⁷ of

⁶ Total Duty owed in 2021/22 is an average of 2022/23 and 2023/24.

⁷ Data for 2021/22 is an average of 2022/23 and 2023/24

households accepted as owed a Duty were registered unemployed and only 13% (249) were in full-time employment.

The table below provides an overview of the demographics and profile of households in Rugby, who were owed a Prevention and Relief Duty following initial homelessness assessments. Please note that 2021/22 data is not available.

Profile		2019/20 to 2023/24	% of Total	2022/23	2023/24	% Change
Age	16-17	13	0.8	7	1	-85.0
	18-24	345	22.4	73	72	-1.3
	25-34	452	29.3	101	87	-13.8
	35-44	351	22.8	82	85	3.6
	45-54	199	12.9	41	53	29.2
	55-64	127	8.2	31	28	-9.6
	65-74	40	2.6	10	6	-40
	75+	14	0.9	3	4	33.3
	Not known	1	0.1	1	0	-100
Nationality	UK	1311	85.0	290	259	-10.6
	EEA	124	8.0	22	31	40.9
	Non-EEA	104	6.7	37	46	24.3
	Ireland	3	0.9	0	0	0
Ethnicity	White	1281	83.7	277	266	-3.9
	Black / African / Caribbean / Black British	99	6.4	21	28	33.3
	Mixed / Multiple ethnic groups	81	5.2	26	17	-34.6
	Asian / Asian British	39	2.5	14	15	7.14
	Not known	24	1.5	5	3	-40
	Other ethnic groups	18	1.1	6	7	16.6
Household Type	Single adult	946	61%	224 100 16 9	198	-11.6%
	Single parent with dependent children	421	27%		93	-7%
	Couple with dependent children	95	6%		27	68.7%
	Other (not defined on MHCLG data)	80	5%		18	100%
Main Applicant – Work Status	Registered unemployed	585	37.9	124	149	20.1
	Full-time work	262	16.0	61	48	-21.3
	Part-time work	203	13.1	53	35	-33.9
	Not working - long-term illness / disability	197	12.7	37	49	32.4

Appendix 1

	Not seeking work / at home	100	6.4	16	21	31.2
	Not registered unemployed - seeking work	47	3.0	6	6	0
	Retired	37	2.3	10	7	-30
	Student / training	13	0.8	3	2	-33.3
	Other	71	4.6	31	17	-45.1
	Not known	27	1.7	8	2	-75

Homelessness Assessments in Rugby

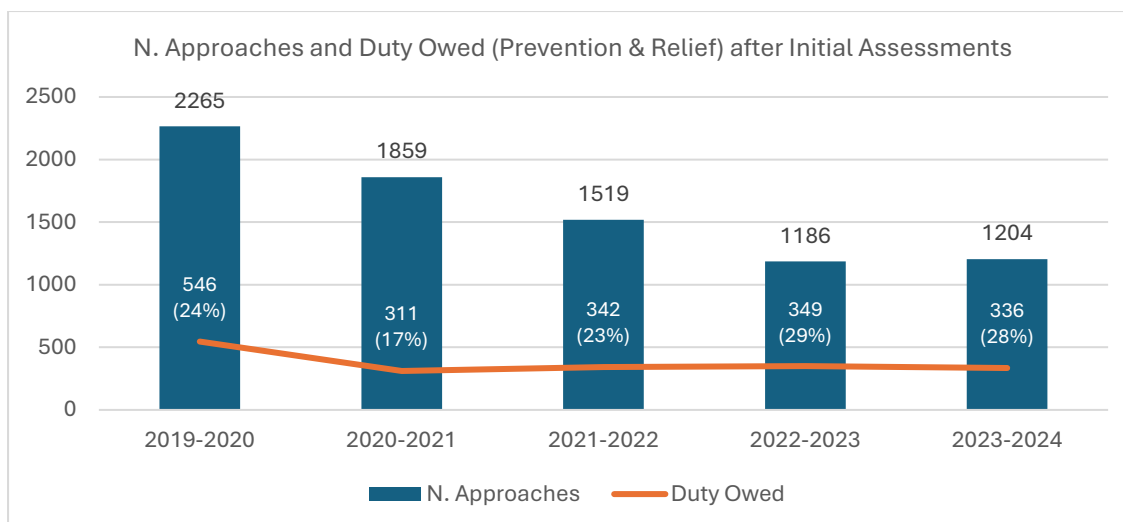
The Housing Advice and Benefits Team (HABT) is responsible for providing advice and assistance to anyone who approaches the Council for housing assistance. Households may approach directly or referred by internal or external services. Some public authorities have statutory Duty to Refer with consent of the service users where they are considered homeless or at risk of homelessness. The specified public authorities subject to the duty to refer are:

- Prisons
- young offender institutions
- secure training centres
- secure colleges
- youth offending teams
- probation services (including community rehabilitation companies)
- Jobcentres in England
- social service authorities (both adult and children's)
- emergency departments
- urgent treatment centres
- hospitals in their function of providing inpatient care
- Secretary of State for defence in relation to members of the regular armed forces

Every household that presents to HABT has an initial assessment to determine their circumstances and what duty under Part 7 Housing Act 1996, Homelessness Act 2022 and Homelessness Reduction Act 2017, if any, is owed to them. New duties introduced in HRA 2017 meant that more people will be eligible for assistance from local authorities.

2019/20 experienced a 27% increase from previous year in the level of assessments completed. Although there has been a reduction in the overall number of approaches year on year since (except small increase in 2023/24), the proportion of households owed a Prevention or Relief Duty following initial assessments has remained steady below 30%.⁸

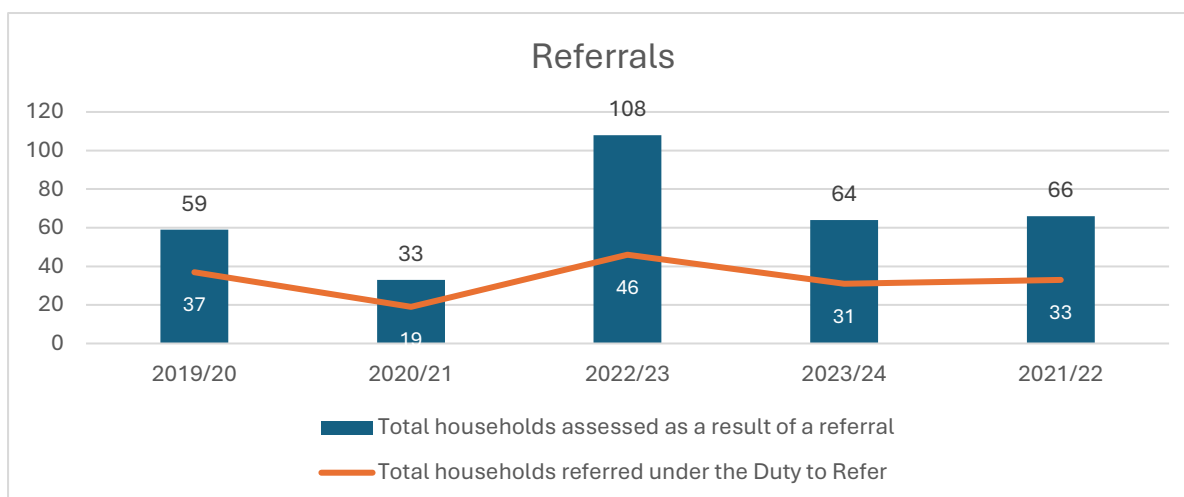
⁸ The data for total households owed a Duty for 2021-22 is an average of 2022-23 and 2023-24



The large number of households who are not owed a duty would still receive advice and support from HAST in terms of information, signposting and referrals to other services.

What is the table telling us – what does it mean for Rugby? Is it that the trend of presentations made has reduced, the resulting duty owed remains fairly constant.

At 82% (1,554), most of the approaches were directly made by households themselves. Only 18% (330)⁹ of the applicants assessed were referred by agencies of which 59% (196) are subject to Duty to Refer. Most of the referrals under Duty to Refer came from The Probation Service, Adult and Children Social Services. The remaining 41% (134) of referrals came from agencies not subject to Duty to Refer such as Supported housing, hub or Housing Related Support Provider, Refuge Provider and other non-housing related provider such as Citizen Advice Bureau/Debt Advice Agency and community based mental health services.

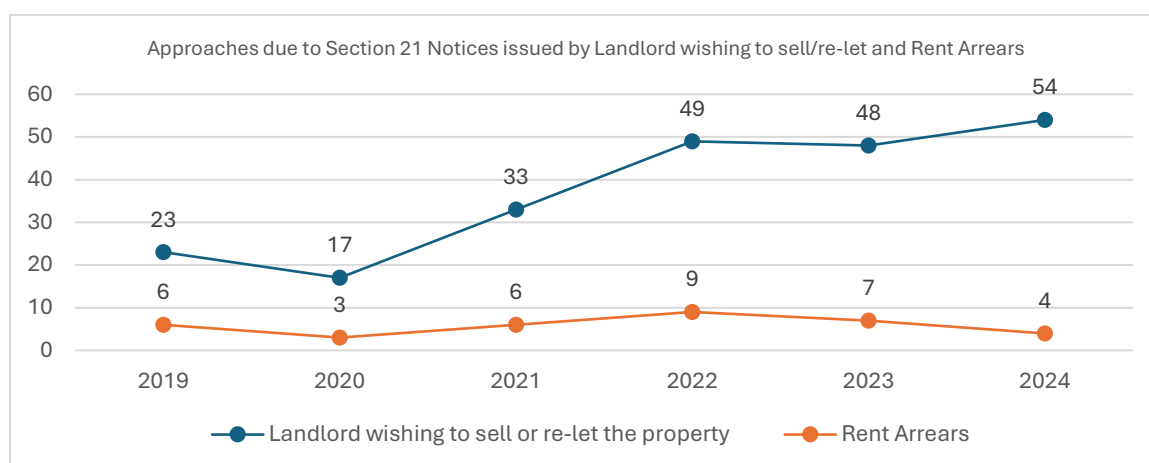


⁹ Data for 2021/22 is an average of data available for the 4 years between 2019/20 – 2023/24.

Reasons for an increase in homeless assessments in Rugby

There has been a marked increase in the number of people approaching the Housing Service who had received Section 21 No Fault Eviction Notice due to landlords wishing to sell or re-let their property. This could be attributed to the cost-of-living crisis since 2021 and the 2022 mini budget crisis that led to a significant increase in mortgage rates which became unaffordable to many homeowners and landlords. The chart below shows that the Notices issued due to rent arrears were low, which may have been reported by households under landlords wishing to relet/sell as they were not able to meet the increased rental costs. The overall number of households owed a Prevention Duty who were issued valid Section 21 Notice over the last 5 years made up 16% (89) of all Prevention Duties most of which is likely to due to landlord wishing to sell or re-let the property.

Action : The Council will seek to prevent homelessness as set out in the Action Plan 'Prevention of Homelessness' (1-6)

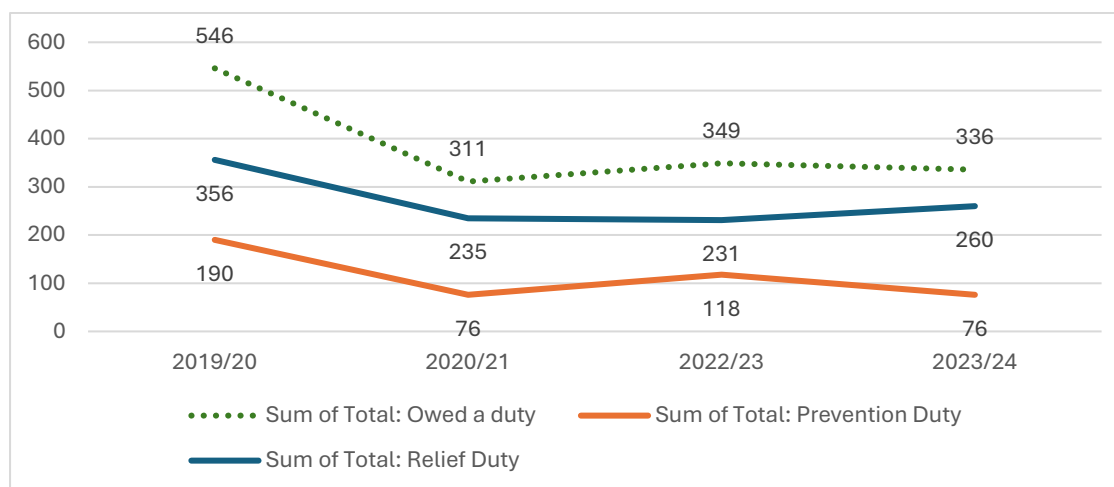


What this means for Rugby – trend of private landlords withdrawing from the market. This increases the importance of formulating positive relationships with those landlords who remain in the marketplace to enable us to effectively discharge our duty into the private sector, where appropriate to do so.

Homelessness Duty and Outcome in Rugby

Of all approaches made to the Council 23% (1,884) were assessed as being owed a Prevention or Relief Duty by the Council. Of which, 30% (557) were Prevention Duties and 70% (1,327) Relief Duties. As the number of Relief Duties remains consistently higher over the last 5 years, it indicates that the Council is reaching fewer households at their

preventative stages where support needs could potentially be identified early and enabling a more targeted approach and interventions to prevent homelessness.



However, the Council successfully prevented homelessness for 217 households by either helping applicants remain in their existing (92) or securing alternative accommodation (125). Of those who were owed a Relief Duty, the Council helped additional 579 households into secure accommodation.

The main activities that led to successful ending of prevention and relief duties involved:

- Social or private rented housing secured by the Housing Advice and Service Team accepted by the applicants.
- Financial payments to fund rent deposits or reduce rent arrears
- Helping applicants on to the Council's housing register,
- Mediation, negotiation and advocacy; and
- Referral to supported accommodation.

Over the last 5 years, social rented housing is the main type of accommodation secured to end Prevention and Relief Duties successfully, followed by private rented accommodation.

	Prevention Duty	Relief Duty	Total
Private Rented Sector	79 – 36%	144 – 25%	223 (28%)
Social Rented Sector	99 – 46%	334 – 58%	433 (54%)
Staying with friends or family	23 – 11%	47 – 8%	70 (8%)
Temporary Accommodation	0	1 – 0.1%	1 (0.1%)
Owner-occupier	3 – 1%	0	3 (0.3%)
Other	13 – 6%	45 – 8%	58 (7%)
Not known	0	8 – 1%	8 (1%)
Total	217 (27%)	579 (73%)	796

What does this mean for Rugby? Social housing remains a hugely valuable tool in discharging our homelessness duties. This underlines the importance of working closely and collaboratively with registered providers operating in the borough and with developing and acquiring stock for the Council's Housing Revenue Account (HRA).

Where duties ended unsuccessfully, they were due to a number reasons ranging from households' lack of engagement with the process, becoming intentionally homeless, losing contact, chaotic lifestyle that hinders meaningful participation in the process or opting out due to factors such as resolve housing problem by themselves. In all cases, the Housing Service provides support in terms of advice, signposting and referral to other services or agencies if appropriate.

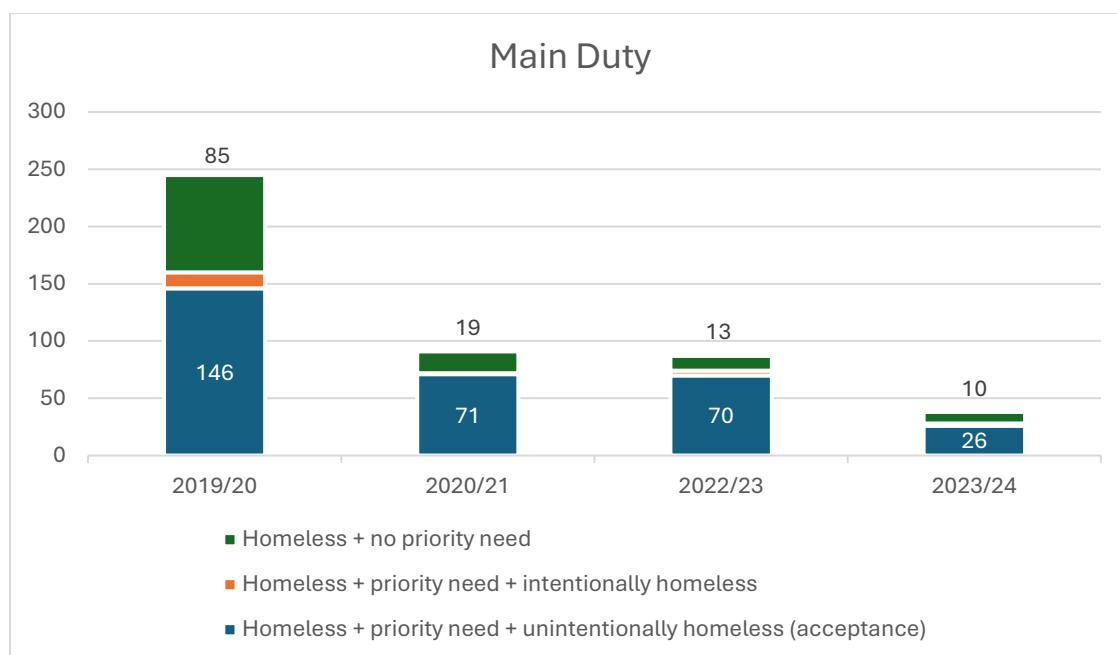
Main Duty

If homelessness has not been relieved within 56 days of Relief Duty, the Council must establish if it owes a Main Duty to the household. That is, they are eligible, unintentionally homeless and in priority need (individuals or households with greater vulnerability as defined in the Housing Act 1996).

The proportion of households owed a Main Duty has declined sharply by 84%, from 245 households in 2019/20 to 38 in 2023/24. This is hugely successful reflecting the activities undertaken as part of Relief and Prevention Duties.

What this means for Rugby – underlines the importance of prevention

Of the 313 households owed a Main Duty, 259 (83%) accepted social housing offer and 10 (3%) private rented sector offer successfully ending Main Duties owed by the Council. For the 44 remaining households the Main Duty ended due to refusal of Housing Act 1996 Part 6 social housing offer (13), became intentionally homeless from Temporary Accommodation (23) and voluntarily ceased to occupy or ceased to be eligible (8).



The table above shows that successful activities to prevent homeless at the relief and prevention stage has dramatically reduced the levels of decisions needed at main duty stage which is positive to ensuring people can be helped out of homelessness at a much early stage.

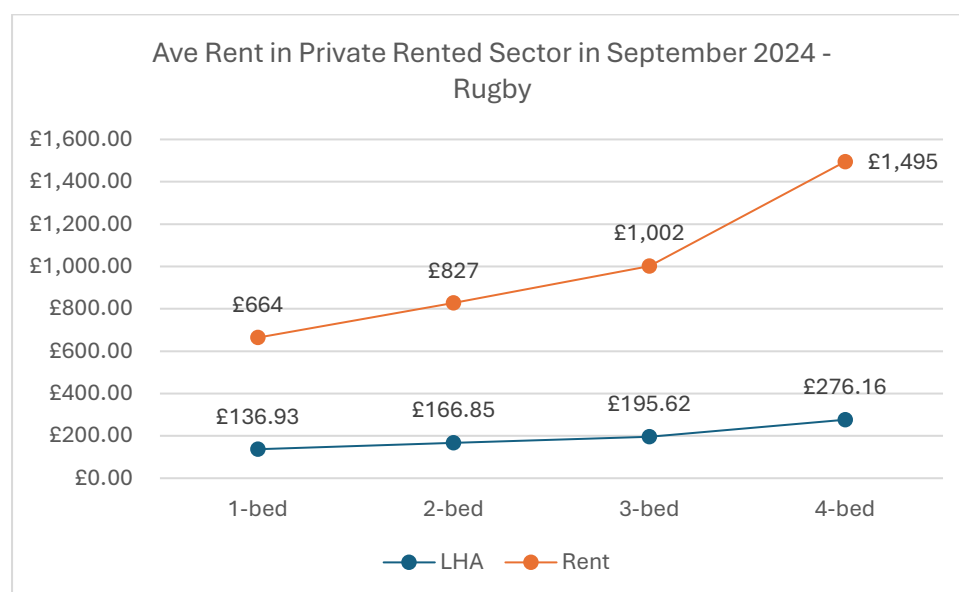
Action : The Council will seek to prevent main duty acceptances by working to prevent homelessness and provide accommodation solutions as set out in the Action Plan 'Provision of Accommodation' (1-4).

Affordability

The average price of a home bought with a mortgage in Rugby was £306,000 in August 2024¹⁰. An increase from the average of £297,000 in August 2023. This is higher than West Midlands, which experienced a lower increase from £261,000 to £254,000 in the same period.¹¹

The average monthly private rent in Rugby was £996 in September 2024. An 8.2% increase from £865 in September 2023. Across the West Midlands, the average monthly rent was £896, up from £823 a year earlier. During the same period, the average rent for England was £1,336 in September 2024, up 8.5% (£105).

The chart below illustrates the gap between Local Housing Allowance Rates (LHA is the amount of housing benefit for the Rugby area for Rugby & East BRMA & Coventry BRMA) and average rent claimants are expected to meet. The LHAs cover between 19-21% of the average rent across different bedsizes. As rents continue to increase and without any significant increase in LHA rates, private sector rents will remain unaffordable for households on low income.

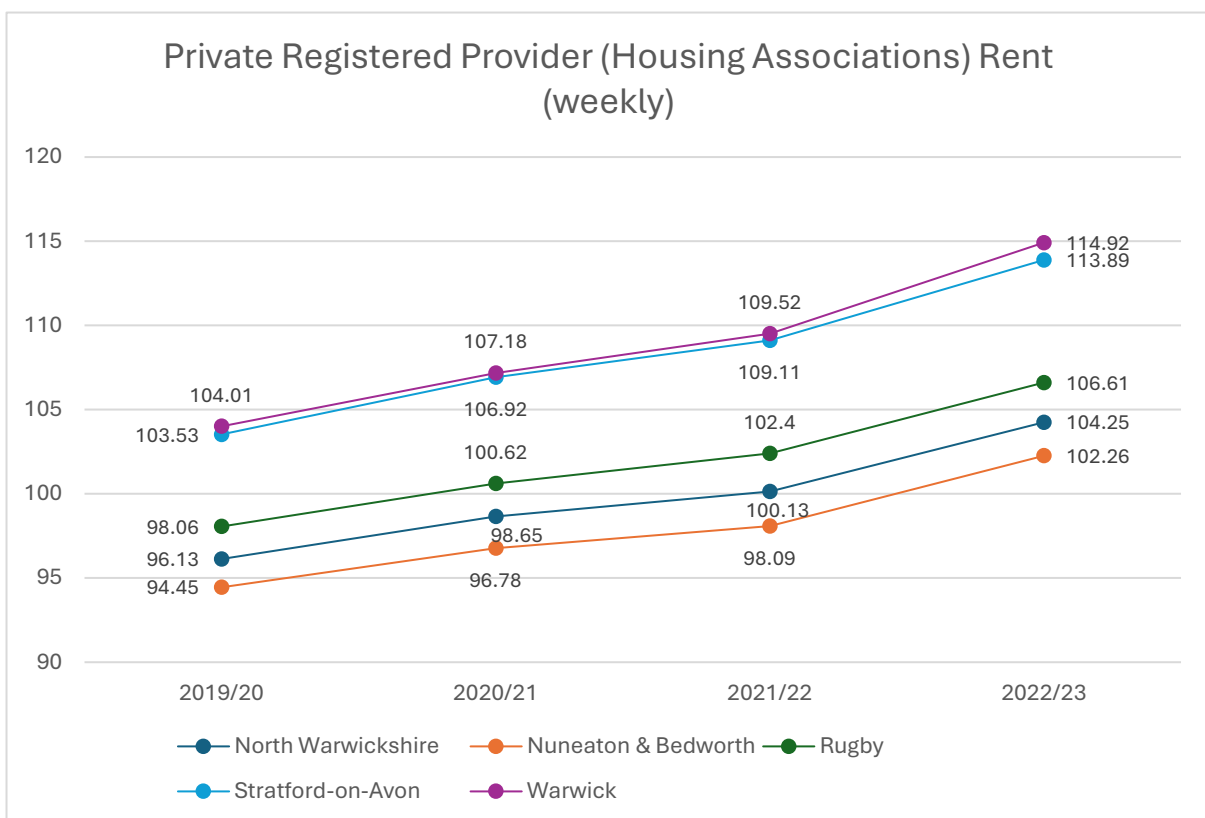
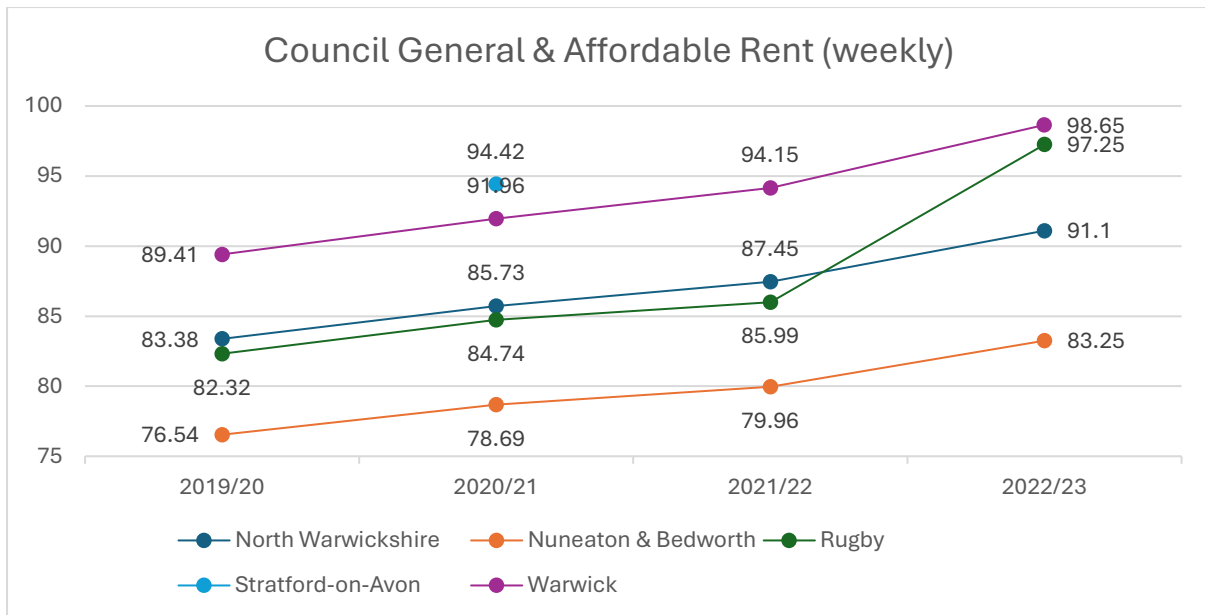


The charts below show continued increase in rents across Warwickshire for both Council and Housing Association properties.¹² However, compared to private rented sector, social housing remains the choice of accommodation for the majority of homeless households due to the comparative low levels of rent.

¹⁰ Office for National Statistics – provisional data

¹¹ Office for National Statistics

¹² Government Statistics



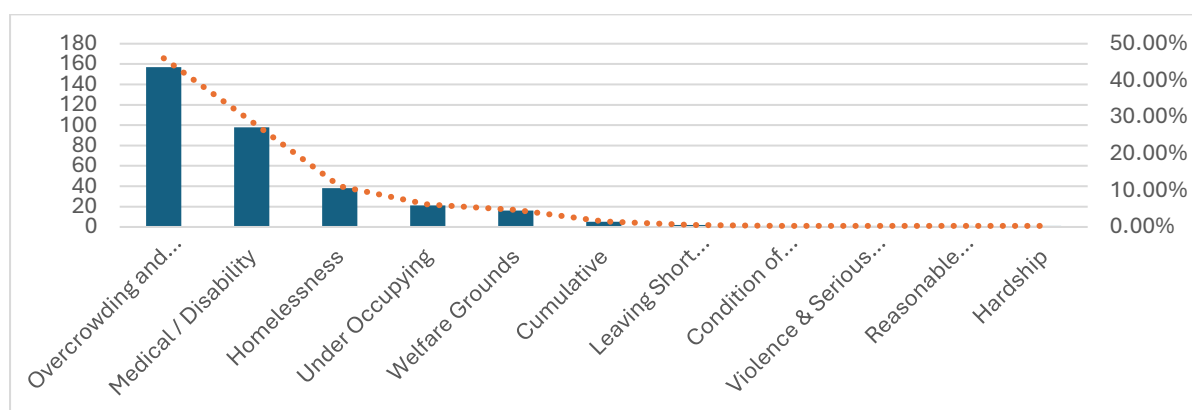
Housing Options in Rugby

Over the last 5 years, 38% of the households owed a duty following initial assessments were registered unemployed and 16% were in full-time unemployment. 18% of the households had support needs, the majority of whom reported mental health problems, physical ill health, disability or domestic abuse. The unemployment rate for Rugby at this time was 12.9% in the year ending December 2023.

Affordability combined with cost-of-living crisis reduces housing options especially for those who or on low income and have support needs. Social rented housing is therefore often a preferred option for service users due to lower level of rents and security of tenure.

Waiting List

Currently¹³ there are 341 applicants on the Council Housing Waiting List. 11% (38), applicants have been assessed with Reasonable Preference¹⁴, (awarded higher priority based on their housing need) of which Homelessness applicants make up the 3rd largest group on the List followed by Overcrowding and Size (46%) and Medical /Disability (29%).

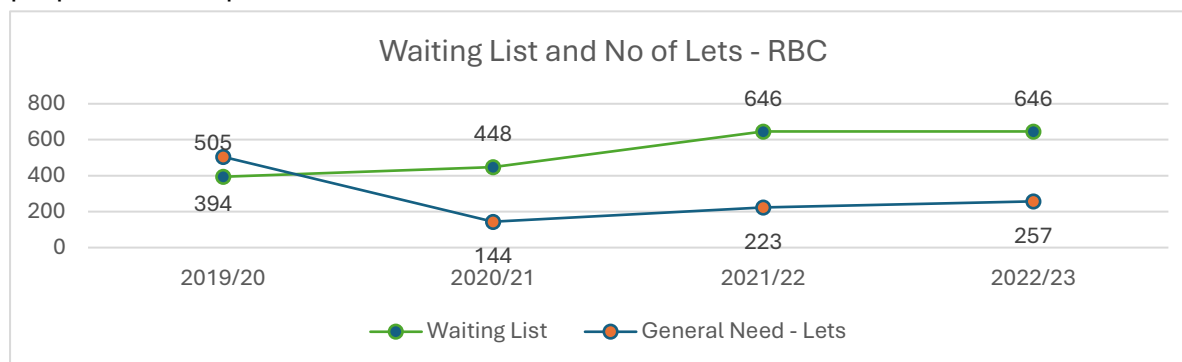


MHCLG Local Authority Housing Statistics show that the demand for social rented housing has increased by 69% since 2019/20. Although the proportion of lets has increased from 32% to 40% between 2020/21 and 2022/23, demand continues to exceed supply, as only over one third of the demand was met during this period. The disproportionate low number of lets during 2019/20 is likely to be due to exceptional circumstances during the Covid pandemic, whereby landlords were unable to let

¹³ As at 18 October 2024

¹⁴ 'Reasonable Preference' refers to level of priority given to applicants under certain circumstances

properties for a period of 12 weeks



The Council has been delivering various initiatives to increase housing options for both private and social housing.

Acquisition – The Council is seeking to increase the supply of additional suitable affordable housing and temporary accommodation owned and managed by the Council. This includes the purchase of new build S106 properties, open market purchases and buying back properties sold under the Right To Buy scheme.

The review of Property Acquisition and Disposal Policy was completed in 2022. Over the last 5 years the Council completed 159 property acquisitions increasing housing supply for those in housing need. The property type and amount delivered in this time period by:

Property type	Number
1 bed	36
2 bed	75
3 bed	39
4 bed	9

Private Sector Leasing Scheme – The scheme was implemented in 2022. The Council leases properties from the Private Sector to help meet our interim accommodation needs to applicants who are homeless. This helps us to ensure we have suitable accommodation available in line with legislation and to help reduce our reliance on nightly paid accommodation.

Private Rented Sector – Homelessness legislation considers the private rented sector to be a suitable housing option subject to meeting suitability criteria. The Council helps secure and provides financial assistance to households to access and remain in private rented sector.

Continued investment in improving the housing stock to ensure that remains fit for purpose

Supported Accommodation – can be interim to long-term accommodation for various vulnerable groups ranging from care leavers, ex-offenders, rough sleepers, people fleeing violence, have history of substance misuse and mental health conditions.

Countywide provision is available for those needing supported accommodation. Doorway and P3 Places to Stay provide accommodation for people experiencing or at risk of homelessness. Hope4 also provide short to medium term accommodation for offenders under probation supervision, young care leavers/asylum seekers and people with mental health problems.

The reduction in County level funding to provide support services and the inadequate provision of in-borough supported / move on accommodation make it challenging to maintain engagement with vulnerable client groups and help them remain in accommodation usually away from social networks and support services. This may be further compounded by the new Supported Housing (Regulatory Oversight) Act 2023.

The Act allows the government to create a new set of standards and introduces licensing regulations applicable to supported accommodation that are exempt from the housing benefit cap. The regulations are currently in draft stage and how service providers will respond to new requirements on licensing and new standards is unknown. The requirement on Local Authorities to carry out a review of supported exempt accommodation in their area and publish a supported housing strategy provides an opportunity to address demand for and supply of all types of supported accommodation at local or county level.

Action : The Council will seek to increase the supply of accommodation options and solutions as set out in the Action Plan 'Provision of Accommodation' (1-4).

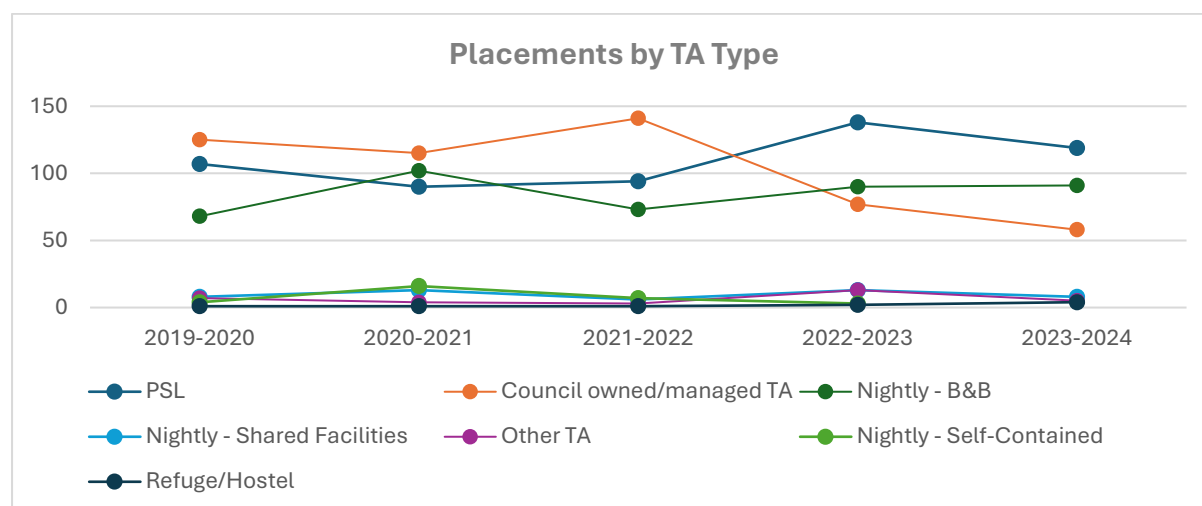
Temporary Accommodation

Over the last 5 years, 1,607 households were placed in Temporary Accommodation. The top 3 accommodation types used for placements were Private Sector Lease (PSL) (34%), Council owned/managed TA (32%) and Bed & Breakfast (B&Bs) (26%).

Mostly, Single Adults (58% -940) and Single Adults with Dependent Children (25% - 404) were placed in TA. The number of children in B&Bs has increased by 54%, from 39 in 2019/20 to 60 children in 2023/24. Notably, 86% of the households including all households with dependent children, spent less than 6 months across all types of temporary accommodation.

Despite the success in maintaining a reduced length of stay in TA, the Council spent on average £64,284.68 per year on B&B provision over the last 5 years. In 2021/22 the spending reached a peak of £78,106.48. However, a 26% reduction was achieved by the end of 2023/24, just below the spending level of 2019/20 (£58,795.46).

On occasion, the council can use its own housing stock as a means for temporary accommodation provision. However, this is a complex arrangement and only by exception when it can be clearly demonstrated that the ring fence between Housing Revenue Account activities and General fund activities (of which homelessness is) are clearly ringfenced. Increasing housing supply will continue to be a priority during the lifecycle of this strategy.



Placements in hostels and refuges have been very low, with 5 and 4 placements respectively. Almost half of the placements (4) were made recently in 2023/24. The low level of placements has been due to the work of the designated team of outreach support through the Rugby Pathways scheme (see below) coupled with specialist officers in the service finding accommodation for people experiencing domestic abuse.

Rough Sleeping

In Rugby, the average number of rough sleepers supported by the Council and its partners per month has increased fourfold, from 2 rough sleepers in 2021/22 to 10 in 2023/24.¹⁵

The latest release on Rough Sleeping Snapshot in England: autumn 2023, published in February 2024 shows that the number of people sleeping rough in a single night has increased regionally and nationally for a second year in a row. Although Rugby has experienced a reduction in the number of people sleeping rough on a single night which peaked 11 in 2019, the latest count of 13 rough sleepers at the time of developing this strategy shows that the number of rough sleepers has more than doubled since the last count in 2023 and has also exceeded the peak of 2019.

Rough sleeping on a single night in Autumn

	2019	2020	2021	2022	2023
N. Warwickshire	0	0	0	0	0
Nuneaton & Bedworth	8	6	1-4	3	10
Rugby	11	4	3	6	4
Stratford-on-Avon	6	4	1-4	4	2
Warwick	21	4	6	11	7
West Midlands	319	214	213	250	256
England	4,266	2,688	2,440	3,069	3,898

Based

on single night counts over the last 3 years in Rugby, the majority of rough sleepers are likely to be men, between 26-40 years of age and are mainly UK or EU nationals.

Year	Total	Gender		Age				Nationality			
		Men	Women	18-25	26-40	40+	Not known	UK	EU	Non EU	Not known
2022	6	5	1	0	1	5	0	4	2	0	0
2023	4	4	0	0	3	0	1	0	3	0	1
2024	13	13	0	1	9	3	0	4	5	1	3
Total	23	22	1	1	13	8	1	8	10	1	4
%		96	4	4	57	35	4	35	44	4	17

Services for Rough Sleepers

The Homelessness Awareness Panel made up of the Housing Service Outreach Team, statutory and voluntary organisations provide coordinated services for those found to be sleeping rough in the borough. The Panel meets regularly to discuss progress in terms of support and accommodation for rough sleeper clients.

The Council successfully secured £400K of Rough Sleepers Initiative funding for the period of 2022 to 2025. The funding has been a lifeline in redesigning existing and

¹⁵ The Ministry of Housing, Communities and Local Government (MHCLG) collects monthly data from local authorities via DELTA. This is designed to understand local authority progress against ending rough sleeping.

delivering new services that are crucial in keeping people safe, supported and off the streets. The following outcomes were achieved:

A proactive service for rough sleepers with a focus on early intervention and prevention. This involved the **restructure and expansion** of the Housing Outreach Team providing outreach, floating and accommodation support; and

A new **Rugby Pathway Scheme** (Outreach Team) for long term entrenched rough sleepers with complex needs. The Scheme is based on Housing First model with dedicated support to help a small cohort of rough sleepers at a time to transition into settled accommodation. To date, 33 rough sleepers have been supported into secure accommodation. The Council provides self-contained accommodation from its own stock on licence agreement to enable transition to independent living.

In addition **Next Steps Accommodation Programme (NASP)** part of 'Everyone In' initiative introduced during Covid pandemic helped fund a dedicated officer to help 15 rough sleepers remain off the street and into secure accommodation through person centred planning and support package to develop skills for independent living.

Securing further central government funding to ensure continuity of the support and building on the successes to date will be a priority during the course of this new strategy, as the increase in the number of rough sleepers is expected to continue in line with national trends.

In addition to the above, the newly created role for an Outreach Worker has been crucial in identifying opportunities for early interventions. Since April 2023, surgeries had been held at various locations managed by partner organisations including the Job Centre, Food Bank and Citizens Advice Centre which resulted in engagement with 135 service users.

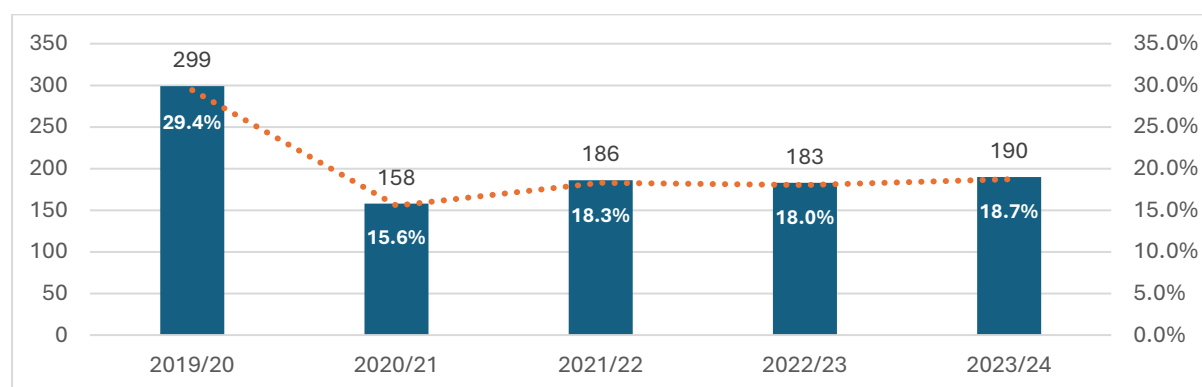
The Council's Severe Weather Emergency Protocol (SWEP) provides emergency accommodation during severe weather. Also, winter placements are provided throughout winter months, during which individuals can access accommodation and support. This provides further opportunities to engage with most entrenched rough sleepers in the borough and closely support them in identifying long term solutions.

Action : The Council will seek to work in partnership to prevent rough sleeping as set out in the Action Plan 'Partnership and Support" (1-4)

Supporting those who are homeless or threatened with homelessness

54% (1,016) of the households owed a Duty had support needs. The majority of them had a history of mental health problems, followed by physical ill health and disability and at risk of or have experienced domestic abuse. A majority of the applicants were also either single adults or single parents with dependent children.

At 299 applicants, the number of households needing support reached its peak in 2019/20, which declined by -47% in 2020/21 (158). However, following an 18% increase between 2020/21 and 2021/22, the number of households owed a duty needing support remained steady and below 2019/20 level over the last 3 years.



The Council works with statutory and voluntary organisations to provide a range of services to households who are at risk of or are already homeless. The table on page 8 gives an overview of the services available from the Council and its partners which are delivered in the form of:

- **Advice and guidance:** information provided on the range of options available to service users in terms of housing, welfare benefits, skills, employment and getting specialist help.
- **Floating support:** for those who need support to manage and maintain their accommodation if it is at risk.
- **Accommodation based support** for homeless households with low to medium support needs, providing a short-term safe place and tailored support with an aim to secure longer-term suitable accommodation. This is available for both young people and those aged 25 years and over.
- **Financial Support** to eligible homeowners, private sector and housing association tenants to remain at home by providing various grants such as Disability Facilities Grant, Hospital Discharge Grants (hospital liaison officers have this budget), Home Safety Grants and Warm and Safer Homes Grants.

- **Financial support** to secure or help remain in existing accommodation by such as rent deposit, from homeless prevention fund for rent arrears, pay rent deposits.
- **Specialist support** for vulnerable groups such as people who have experienced or at risk of violence and abuse, people with substance misuse, ex-offenders and people with mental health problems and/or disabilities.
- **Dedicated resource** to support those who are sleeping rough including the provision of safe place in severe weather conditions and cold weather provisions
- **Housing Pathways Scheme** – interim accommodation and intensive support to help entrenched rough sleepers who may have experienced trauma and repeat homelessness come off the street.
- **Pathways for vulnerable groups** – to help prevent homelessness, transform lives and develop independent living skills by providing coordinated support. Cohorts include those with mental health and/or substance misuse problems, leaving criminal justice system and rough sleepers.
- **Outreach Team** - Rough Sleepers Solutions Officers work with people identified as sleeping rough by providing information, advice and arranging referral to support services.
- **Hospital Discharge** - County wide Hospital Liaison Officers working with hospital discharge teams and Housing Service to ensure patients who are homeless or at risk of homelessness have accommodation and/or support before discharge.

Services for households who are homeless or are threatened with homelessness		Service Level	Young People	Single Adults 25+	Families	Rough Sleepers	Special Need Groups
General advice & Support	Rugby Council Homelessness & Prevention Team	Local				√	√
	Rugby Citizens Advice Bureau	Local				√	√
	Housing Benefits Team	Local					
	Rugby Job Centre (DWP)	Local					
	P3 – Navigator Hubs for general advice and support	County				√	√
	Together SWiFT – for people with disabilities	County					√
	Doorway – supports homeless young people	County					
	Rugby Hope4 Centre	Local					
Accommodation based support	HEART financial assistance for aids and adaptations, improving home conditions and hospital discharge	County					
	Disability Facilities Grant- help homeowners carry out adaptations	Local					
	Hosing and Hospital Liaison Service	County					
Floating Support/ Outreach	Rugby Council Rough Sleeper Solution Officers	Local				√	
	Rugby Council Tenancy Coaches	Local					
	St Basils	County					
	Hospital Liaison Officer (Countywide)	County					
	Together – Disability Floating Support including Mental Health	County					√

	P3 – Floating Support	County						√
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Services for households who are homeless or are threatened with homelessness in Rugby

Services for households who are homeless or threatened with homelessness		Service Level	Young People	Single Adults 25+	Families	Rough Sleepers	Special Need Groups
Specialist Support	SWEP – Severe Weather Emergency Provision	Local				√	
	Cold weather provision	Local				√	
	RoSA – support for victims of sexual abuse or violence	County					√
	Blue Sky Centre Sexual Assault Referral Centre	County					√
	Futures Unlocked – support for ex-offenders	County					√
	Nacro (pre and post probation) – West Midlands	Regional					√
	Change, Grow, Live - recovery focused drug and alcohol services	County					√
	Rugby Wellbeing Hub for people with mental illness or impairment	Local					√
Supported Accommodation	Doorway	County					√
	Coventry and Warwickshire YMCA	County					
	Langley Trust – Ex offenders	County					
	Joy Homes in-borough supported accommodation	County					
	P3 – Young People Supported Accommodation	County					
	P3 – Accommodation based HRS Service for adults 25+ years	County					
	Rugby Housing Pathway – entrenched and repeat homelessness	Local					
General Need Accommodation	Housing Allocation Scheme for access to Social Rented Housing	Local					
	Rugby Council Private Sector Leasing Scheme	Local					

	Council Financial Assistance to help secure Private Rented housing	Local					
	Intermediate Home Products e.g. Intermediate Rent and Shared Ownership	Local					
	Financial assistance to help remain in existing accommodation	Local					

Our Priorities and Action Plan

This strategy identifies four key priority areas which will shape the way the Council will work with its partners to address homelessness in the borough. These priorities are informed by the homelessness evidence base, feedback from service users, members of staff and partners represented in the Rugby Homelessness Forum.

The priorities are focused on preventing homelessness, supporting households who are already homeless or threatened with homelessness and ensuring a range of options available to alleviate homelessness. Homelessness is complex and requires a multi-agency approach. Collaboration with partner agencies, such as Public Health to achieve positive health outcomes for homeless households who are more likely to experience health problems and inequality than the general population is key.¹⁶ We will deliver these priorities through our Action Plan as set out on page 35.

The Council will work with its partners in the following priority areas:

1. The prevention of homelessness

- Contract with Citizens Advice Bureau (CAB) providing money advice support for financial inclusion
- Ensuring support to access social housing and private sector accommodation is accessible to all key customer groups;
 - single people
 - support for rough sleepers
 - support for families
 - support for victims of domestic abuse
 - veterans and their families
- Housing services – tenancy coaches and tenancy sustainment work to ensure customers are tenancy ready and can sustain accommodation
- Work to prevent and relieve the main causes of homelessness in Rugby as identified in the evidence review (private sector accommodation and relationship breakdowns and eviction from relatives & family homes)
- Engagement with support providers and mental health services for vulnerable users
- Early engagement and open lines of communications with Registered Providers (RPs)
- Increasing supply and access to supported housing for young people
- Ensuring robust and effective delivery of the Joint Housing Protocol for homeless young people and care leavers
- Effective utilising our homelessness prevention grant to help customers to sustain their tenancy
- Mediation to prevent friends and family evictions including upstream prevention work (preventing negative outcomes before reaching crisis point)

¹⁶ Independent Investigation of the National Health Service Report - 2024

2. Tailored support for our most vulnerable clients

- Disabled Facilities Grant
- Rough sleepers
- Pathways customers and customers with complex needs
- Hospital discharge customers
- Prison release customers
- IDVA trained staff to provide support for DA & to access further support services
- Homes for Ukraine scheme
- Close liaison with the Home Office and Migration services
- Continued review of the pledge for Afghans, Syria & all asylum dispersal customers

3. Ensure that we enable a variety of accommodation options to meet specific customer needs

- Rent deposit & Rent in advance policy
- Acquisitions strategy and links to the corporate asset management strategy
- Strategic enabling with RP's and Homes England
- Landlords Forum & engagement with key stakeholders
- Work with housing providers to secure new housing developments & alternative accommodation options
- Keep the Private Sector Leasing scheme under review (PSL) based on housing and homeless service need
- Reciprocal arrangements with other LA's alongside county wide partnership working
- Review Housing Allocations policy biannually
- Ensure we are looking to increase social housing supply

4. work with our partners across the statutory and VCS to secure the best outcomes for clients

- Work collaboratively with all key partner agencies
- Citizens Advice Bureau
- Hope 4 and P3, providing support & assistance to vulnerable customers
- Working to support the Warwickshire authorities joined up Warwickshire homelessness strategy
- Public health, working with and supporting referrals from medical providers and hospital discharge cases
- Housing Related Support
- Setting up an internal officer group reviewing the strategies action plan & measuring its keys objectives (annual review and assessment alongside an updated evidence base of service demand)
- Develop a collaborative action plan developed with the Councils key stakeholders

- Work with and support work with community groups and voluntary sector across the district, in line with governance reporting, annual review of our priorities and reviewing and measuring outcomes for households to help us measure success

Appendix 1

Rugby Homelessness Strategy 2025 – 2029 Action Plan

Prevention of Homelessness		Target or Achieve by and responsible person
Action 1	Recruit an Early Intervention and Housing Options Apprenticeship using Homeless Prevention Grant Funding	Q1 2025 HABT Manager
Action 2	Develop a Rent Deposit Scheme	Q2 2025 HABT Manager & Team Leader
Action 3	Develop pathways for vulnerable groups including <ul style="list-style-type: none"> - Victims of domestic abuse - Ukraine and asylum dispersal cases - Rough sleepers 	Q3 2025 HABT Team Leader and supervisor
Action 4	Review young homelessness crisis pathway intervention and develop joined up approach with social services	Q1 2026 HABT Manager
Action 5	Continue to develop early intervention and long term recovery housing options for rough sleepers alongside our pathway accommodation model	Q3 2025 - HABT team leader and pathway supervisor
Action 6	Review team training and team development to prepare for upcoming legislation changes such as the Renters Reform Bill	Q2 2025 Service manager and Team Leader

Provision of Accommodation		Target or Achieve By
Action 1	Draft and implement a Temporary Accommodation Policy	Q4 2025 HABT Manager
Action 2	Conduct a feasibility study on demand, potential sites and opportunities for in-borough hostel and supported accommodation provision for a range of special needs group with low to high support needs.	Q1 2027 HABT Manager
Action 3	Bring back units under Private Sector Leasing Scheme	Ongoing yearly action alongside needs of the service
Action 4	Complete acquisitions for additional social housing	30 per annum led by HABT Manager
Action 5	Conduct a review of Re-Designation of existing housing stock to meet housing need and demand	2027 – HABT manager and waiting list supervisor

Partnership and Support

Target or
Achieve
by

Action 1	Work collaboratively with Warwickshire councils to manage the reduction in supporting people funding on outreach homelessness services	Q1 2025 HABT Manager
Action 2	Work with the Warwickshire Councils and public health to agree an action plan for collaborative working to address health inequalities for those facing homelessness	Q2 2026 – HABT Manager
Action 3	Set up an internal officer group as a steering group to monitor delivery of key objectives and review latest challenges (meeting quarterly with annual review)	Q3 2025 HABT Manager
Action 4	Community engagement/ Service user consultation to inform annual review of the proposed strategy	Q4 of each year – HABT Manager & Team Leader

Create efficiencies

Target or
achieve
by

Action 1	Review processes to increase operational efficiency	Q4 each year alongside KPI data – HABT Manager
Action 2	Review IT requirements to increase operational efficiency	2025-2029
Action 3	Review reporting data and quality to increasingly use performance data to inform budgets and service delivery	Q3 2025 – HABT Manager
Action 4	Training plan for the team to ensure continuous development	2025-2029
Action 5	Seek to agree budget for a Housing Review and Quality Assurance Officer	Q1 2025 – HABT Manager
Action 6	Review and management out of hours provision	Q1 2025 – HABT Manager
Action 7	Continue to needs and demand of temporary accommodation provision including the reduction in the use of B&B	Each quarter review for each year of the strategy
Action 8	Develop a system for collecting data on homeless data to help inform future strategies, the quarterly and annual review of the action plan and operational service delivery	Each quarter review – by HABT Manager
Action 9	Create a sustainability plan to help ensure long term success of action plan initiatives	Yearly review by HABT Manager

Appendix 2

Statutory Homelessness Duties Explained

Local Authorities have a series of duties if a person meet the statutory definition of homelessness and are eligible for assistance

Irrespective of any duties owed and priority need, anyone seeking assistance will be provided with advice and support

Prevention Duty

Local authorities have a duty to take reasonable steps to prevent an applicant's homelessness.

The prevention duty is owed to all eligible applicants threatened with homelessness in the next 56 days, irrespective of 'local connection', 'priority need' or 'intentional homelessness'.

The duty is also owed where a valid Section 21 notice has been served which expires within 56 days.

The prevention duty may mean for example, negotiating with a landlord or family member, providing mediation, helping to reduce rent arrears, or securing alternative accommodation before a household becomes homeless.

Relief Duty

Local authorities have a duty to take reasonable steps to relieve an applicant's homelessness.

The relief duty is owed to all eligible applicants who are homeless, irrespective of 'priority need' or 'intentional homelessness'. At the Relief stage applicants with no 'local connection' to the local authority where they have made their request for homelessness assistance can be referred to a 'local authority where they do have a 'local connection'.

If the local authority has reason to believe the applicant is in priority need, it may have a duty to provide interim accommodation during the relief duty.

The duty lasts up to 56 days but may be extended if no main duty is owed.

The relief duty may mean for example, helping an applicant to secure housing in the private sector with tenancy for 6 or more

Main Duty

The main duty is owed to applicants whose homelessness has not been prevented or relieved, who are homeless through no fault of their own, and who are in priority need.

It places a duty on the local authority to secure an accommodation for their occupation until the Duty is ended. That duty is ended successfully when an applicant accepts an offer of social housing or a private rented tenancy for 12-months. The main duty can end unsuccessfully if for example the applicant abandons or loses their temporary accommodation provided to meet the main duty; refuses a suitable offer of accommodation or ceases to be eligible.

Applicants who are in priority need but are intentionally homeless may receive advice and assistance, and temporary accommodation for a short period of time whilst they make alternative

Key Terms

- **Eligibility** for homelessness assistance depends on immigration and residence status. Different rules apply for British and Irish nationals, and for people from abroad.
- A **Section 21** eviction notice is a legal route through which landlords can evict tenants who have an assured shorthold tenancy.
- People in **priority need** include those who are: pregnant or have children; care leavers aged 18 to 21; aged 16 or 17 and not owed a Children Act duty; homeless as a result of domestic abuse; homeless due to flood, fire or other disaster; and those deemed by the local authority to be 'vulnerable' due to, for example, mental or physical disabilities, old age, having been in custody or the armed forces.
- **Duty to Refer** Homelessness Reduction Act 2017 places a duty on specified public authorities to refer service users who they think may be homeless or threatened with homelessness to local authority homelessness/housing options teams. This is designed to encourage public authorities to work together and build strong partnerships to intervene and prevent homelessness by considering the housing needs of their service users.

Disclaimer

Local Authorities report detailed information on homelessness applications to the Ministry of Housing, Communities and Local Government (MHCLG) through Homelessness Case Level Information Collection (H-CLIC).

Government Homelessness Statutory Statistical Releases are based on these submissions. Data used in this strategy detailing homelessness activities and homeless applicants are mostly based on the above statistical releases.

However, where the above source is cited in this strategy, the data should be treated with caution as the statistical submission to government for Rugby Borough Council 2021/22 does not appear to have collated. The most likely reason for this is the pressures brought about by the covid 19 pandemic and the reallocation of resource to manage the emergency response. It is believed the absence of this data has not distorted the overall homeless picture and efforts over the next 12 months by the housing steering group will be taken to try and extrapolate information from IT systems to obtain this data.

To compensate for the missing data and enable an overview of the level of homelessness and relevant activities in Rugby over the last 5 years, the average of 2022/23 and 2023/24 data has been used.

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Housing Advice and Benefits
Policy/Service being assessed	Rugby Homelessness Strategy 2025-30
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	New proposed strategy
EqlA Review Team – List of members	Daniel Khan, Elaine Howard and Weronika Krakowiak
Date of this assessment	23/01/2024
Signature of responsible officer (to be signed after the EqlA has been completed)	Daniel Khan

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Chief Officer for Legal and Governance.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>The proposed strategy has for aims as follows:</p> <p>Prevention of homelessness – early intervention and support to help service users remain in their existing home and reduce the number of approaches to the Housing Service to households who are actually homeless.</p> <p>Tailored support for our most vulnerable clients – work with partners to provide bespoke support to access relevant services and work with service users to develop and maintain independent living skills.</p> <p>A variety of accommodation options to meet specific customer needs – deliver a range of housing options in both the social and private housing rented sectors.</p> <p>Work with our partners across the statutory and VCS to secure the best outcomes for clients – strengthen partnership working especially with Public Health to pool resources and co-ordinate services to overcome health inequalities and gain positive outcomes for the service users.</p>

<p>(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?</p>	<p>The proposed strategy fit with the following Corporate Priorities:</p> <p>A Fair Rugby, as the strategy seeks to reduce inequalities by preventing and relieving homelessness for those who are or at risk of becoming homeless. It also improves property conditions and brings back empty homes back into use through the Private Sector Leasing Scheme providing accommodation for those accepted as owed a homelessness duty.</p> <p>A Healthier Rugby, one of the priority of the proposed strategy is to prevent homelessness by intervening early before households reach crisis point. It will also continue to contribute towards A Healthier Rugby through</p> <ul style="list-style-type: none"> - The proposed recruitment of a homelessness Intervention Officer - Planned collaboration with Warwickshire Public health on reducing health inequalities; and - Other existing frameworks including Housing & Hospital Liaison and coordinated multi agency support for the cohort to achieve positive health outcomes for those who are homeless or at risk of homelessness.
<p>(3) What are the expected outcomes you are hoping to achieve?</p>	<p>The strategy Action Plan 2025-30 will be reviewed annually and the outcomes it aims to achieve include:</p> <ul style="list-style-type: none"> - Reduced homelessness through early interventions - Positive health outcomes and access to health services through close working relationship with Warwickshire Public Health - Better support for vulnerable groups through co-ordinated services with internal and external partners.
<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>The strategy seeks to work in partnership with key stakeholders to build on its successes and continue to provide advice, support and a range of housing options to those assessed as homeless or threatened with homelessness. The proposed strategy priorities and its Action Plan will not affect any groups.</p>

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<p>(5) Will the policy or decision involve substantial changes in resources?</p>	<p>A recruitment of Early Intervention Officer and Housing Options Apprenticeship. The costs will be using Homelessness Prevention Grant, a yearly funding received from the Government to run homelessness services. The housing service will continue to seek other funding available from the Government such as Rough Sleepers Initiative.</p>
<p><u>Stage 2 – Evidence about user population and consultation</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>

(1) What does the data tell you about the groups this policy or decision impacts?

Possible data sources:

- national statistics/census data
- local statistics
- evaluations
- analysis of complaints
- user feedback
- outcomes from consultation/community voice
- Council published information, service data
- [District and Ward Profile – Warwickshire Observatory](#)
- [Office of National Statistics](#)
- [Fingertips health profiles](#)
- [Indices of Multiple Deprivation](#)
- [RBC Annual Workforce Equality Report](#)

Data from the last 5 financial years have been used to inform the proposed strategy using internal and external sources mainly, the Council’s case management system Jigsaw and government annual Statutory Homelessness Statistical Releases.

The number of households who are statutorily homeless (assessed as homeless or threatened with homelessness within 56 days) have remained steady over the last 4 years between 311 and 349 households. Notably, this is lower than 546 households recorded in 2019/20. This is consistent with Councils across the County which experienced higher cases of homelessness during the Covid-19 pandemic.

Majority (86%) of the households approached the Council when they were already homeless as opposed to when their circumstances were at preventative stage (36%). The top 3 reasons for loss of last settled home or threat of homelessness were due to –

- Family or friends no longer willing or able to accommodate (30%),
- End of private rented assured shorthold tenancy (20%), and
- Domestic abuse (12%).

Households accepted as Statutorily Homeless were mostly:

- Between 24-34 years old (29%), followed by 18-24 (22%) and 35-44 (22%) year olds,
- UK nationals (85%). Over the last 2 years there has been a 10% drop in this group whilst main applicants with both EEA and non-EEA nationalities increased by 41% and 24% respectively. An increase of 9 applicants in both EEA and non-EEA nationalities.
- White (84%),
- Single adult (61%), and
- Registered unemployed (38%). 29% were either in full or part-time employment.

The table overleaf provides a profile households accepted as statutorily homeless over the last 5 years. Please note the 2021/22 data is not available from the government statistical returns.

Appendix 2

Profile		2019/20 to 2023/24	% of Total	2022/23	2023/24	% Change
Age	16-17	13	0.8	7	1	-85.0
	18-24	345	22.4	73	72	-1.3
	25-34	452	29.3	101	87	-13.8
	35-44	351	22.8	82	85	3.6
	45-54	199	12.9	41	53	29.2
	55-64	127	8.2	31	28	-9.6
	65-74	40	2.6	10	6	-40
	75+	14	0.9	3	4	33.3
	Not known	1	0.1	1	0	-100
Nationality	UK	1311	85.0	290	259	-10.6
	EEA	124	8.0	22	31	40.9
	Non-EEA	104	6.7	37	46	24.3
	Ireland	3	0.9	0	0	0
Ethnicity	White	1281	83.7	277	266	-3.9
	Black / African / Caribbean / Black British	99	6.4	21	28	33.3
	Mixed / Multiple ethnic groups	81	5.2	26	17	-34.6
	Asian / Asian British	39	2.5	14	15	7.14
	Not known	24	1.5	5	3	-40
	Other ethnic groups	18	1.1	6	7	16.6
Household Type	Single adult	946	61%	224	198	-11.6%
	Single parent with dependent children	421	27%	100	93	-7%
	Couple with dependent children	95	6%	16	27	68.7%
	other	80	5%	9	18	100%

Appendix 2

		Profile	2019/20 to 2023/24	% of Total	2022/23	2023/24	% Change	
Main Status	Work	Registered unemployed	585	37.9	124	149	20.1	
		Full-time work	262	16.0	61	48	-21.3	
	-	Part-time work	203	13.1	53	35	-33.9	
	Applicant		Not working - long-term illness / disability	197	12.7	37	49	32.4
			Not seeking work / at home	100	6.4	16	21	31.2
			Not registered unemployed - seeking work	47	3.0	6	6	0
	Status		Retired	37	2.3	10	7	-30
			Student / training	13	0.8	3	2	-33.3
			Other	71	4.6	31	17	-45.1
			Not known	27	1.7	8	2	-75

Rough sleeping

The average number of rough sleepers supported by the Council and its partners per month has increased fourfold, from 2 rough sleepers in 2021/22 to 10 in 2023/24.

Rough Sleeping Snapshot in England 2023, shows that the number of people sleeping rough in a single night has increased regionally and nationally for a second year in a row. Although Rugby has experienced a reduction from 11 in 2019 to 4 in 2023, the latest count of 13 rough sleepers at the time of developing this strategy shows that the number of people sleeping rough has more than doubled since the last count in 2023 and has also exceeded the peak of 2019.

Based on single night counts over the last 3 years in Rugby, the majority of rough sleepers are likely to be men, between 26-40 years of age and are mainly UK or EU nationals.

Appendix 2

Rough sleeping snapshot 2022-2024											
Year	Total	Gender		Age				Nationality			
		Men	Women	18-25	26-40	40+	Not known	UK	EU	Non EU	Not known
2022	6	5	1	0	1	5	0	4	2	0	0
2023	4	4	0	0	3	0	1	0	3	0	1
2024	13	13	0	1	9	3	0	4	5	1	3
Total	23	22	1	1	13	8	1	8	10	1	4
	%	96	4	4	57	35	4	35	44	4	17

<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>n/a</p>
<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>To inform the proposed strategy, the Council has consulted with grassroots agencies, statutory partners and members of the Rugby Homelessness Forum extensively who closely work with communities and vulnerable groups. Feedback from stakeholders and available data on service users shaped the strategy. The proposed Action Plan includes actions for Year 1.</p> <p>Regular annual reviews will be undertaken during the lifespan of the proposed strategy. This will include community engagement and service user consultations. Proceeding Action Plans will reflect outcome of the reviews and implemented over the lifetime of the strategy.</p>

Stage 3 – Analysis of impact			
<p>(1) Protected Characteristics From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	Protected Characteristic	Nature of Impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Age	Positive No discriminatory impact identified, all approaches are assessed and given advice and support dependent upon outcomes of the assessments. The proposed strategy and Action Plan seeks to prevent and relieve homelessness with co-ordinated services esp for most vulnerable groups.	Medium
	Disability	As above	As above
	Sex	As above	As above
	Gender reassignment	As above	As above
	Marriage/civil partnership	As above	As above
	Pregnancy/maternity	As above	As above
	Race	As above	As above
	Religion/belief	As above	As above
	Sexual Orientation	As above	As above

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(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive Multi-agency approach to tackling homelessness in Rugby will involve referrals to support services, advice and support to develop independent living skills such as budgeting and income maximisation. Focus on increased partnership working with Warwickshire Public Health will enable address health inequalities and positive outcomes for service users.	Medium

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	<p>Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution</p>	<p>Positive As part of the proposed strategy, the Council will continue to explore and provide a range of housing options for its service users. The Private Sector Leasing Scheme, acquisitions and the Rugby Pathway are examples of schemes that help increase housing supply and support most vulnerable groups to move on to settled homes. The Severe Extreme Weather Provision (SWEP) Policy also helps provide winter placements and support to those sleeping rough. It provides opportunities to engage with this cohort to provide additional support and/or refer to relevant services.</p>	<p>Medium</p>
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Appendix 2

<p>(3) Using the information gathered in stages 2 and 3, what will the positive impact of the strategy/policy be on equality?</p>	<p>Over the last 5 years, 54% (1,016) of the households assessed as statutorily homeless had support needs. The majority of them had a history of mental health problems, followed by physical ill health and disability and at risk of or have experienced domestic abuse. A majority of the applicants were also single adults (61% - 933).</p> <p>The proposed strategy embodies partnership working and coordinated services especially for those who are most vulnerable. The outcome of the recently reviewed Allocations Policy also underpins this by allocating highest band to homeless applicants to whom the Council has a duty find a secure home. The Policy also takes into consideration sex overcrowding due to a child over the age of 10 but not yet 16 who is transitioning and is receiving specific medical treatment.</p>
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>n/a</p>
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>More than a thousand households approach The Housing Advice & Benefits Team for advice and/or support re homelessness every year. Initial assessments are completed for everyone who approaches the service, as part of which equality data are also collected.</p> <p>Data on all protected groups are collected and used to determine targeting resources and in government data submissions.</p>
<p>(6) Complete this section if any medium or high adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to mitigate the negative impacts identified in 3.1 to ensure that no discrimination is taking place.</p>	<p>n/a</p>

<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)? The feedback/data should be used to inform your Action Plan in (2)</p>	<p>Reliable data is crucial in understanding the level of homelessness in the borough, communities affected, identifying needs and measuring performance. Over the last 5 years, data reported via MCHLG Homelessness Case Level Information Collection (H-CLIC) included missing data.</p> <p>Missing data can impact on performance management, service improvement and delivering proactive and responsive that addresses needs of the service users.</p>

If No Further Action is required then go to –
Review and Monitoring

(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.

EqlA Action Plan

Action	Lead Officer	Date for completion	Resource requirements	Comments
Staff refresher training to improve homelessness data collection and recording	Elaine Howard	2025 – 2029 continuous	Existing resources	This is to address missing data, if significantly high can affect service provision and understanding of issues.
Community engagement/ Service user consultation to inform annual review of the proposed strategy	Daniel Khan	2025-2026	Existing resources	Ensure service provision reflects local needs.

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	Action	Lead Officer	Date for completion	Resource requirements	Comments
	Review reporting data and quality to increasingly use performance data to inform budgets and service delivery	Daniel Khan	End 2025	Existing Resources	Embed and promote data led decision making and service delivery
	Seek to agree budget for a Housing Review and Quality Assurance Officer	Daniel Khan	End 2025	Business Case	As above
<p>(3) Review and Monitoring State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>	<p>The Rugby Homelessness Forum and the proposed Housing Steering Group will monitor the recommended Action Plan quarterly and review the plan annually to reflect any developments and changes in legislations, practices and local service needs. Yearly reviews and updating of the Action Plan will also be completed in consultation with the portfolio holder for Housing and Communities.</p> <p>The Housing Advice and Benefits Team collects equality data from all households who approach the service with regards to homelessness. If budget agreed, the proposed Housing Review and Quality Assurance Officer will review housing data collections and submissions. The role will also ensure that the equality data are captured as per relevant guidance.</p>				

Please annotate your policy with the following statement:

'An Equality Impact Assessment on this policy was undertaken on 23/01/2025 and will be reviewed on 23/01/2026