

# Public Document Pack



**COTSWOLD**  
DISTRICT COUNCIL

Thursday, 30 December 2021

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## **CABINET**

A meeting of the Cabinet will be held in the Council Chamber at the Council Offices, Trinity Road, Cirencester on **Monday, 10 January 2022 at 6.00 pm.**

Rob Weaver  
Chief Executive

To: Members of the Cabinet  
(Councillors Rachel Coxcoon, Tony Dale, Andrew Doherty, Mike Evemy, Jenny Forde, Joe Harris, Juliet Layton and Lisa Spivey)

Recording of Proceedings – The law allows the public proceedings of Council, Cabinet, and Committee Meetings to be recorded, which includes filming as well as audio-recording. Photography is also permitted.

As a matter of courtesy, if you intend to record any part of the proceedings please let the Committee Administrator know prior to the date of the meeting.

# AGENDA

1. **Apologies**
2. **Declarations of Interest**  
To receive any declarations of interest from Members and Officers, relating to items to be considered at the meeting.
3. **Minutes (Pages 7 - 16)**  
To approve the minutes of the meeting of the Committee held on 6 December 2021.
4. **Chair's Announcements (if any)**
5. **Public Questions**  
To deal with questions from the public within the open forum question and answer session of fifteen minutes in total. Questions from each member of the public should be no longer than two minutes each and relate issues under the Committee's remit.
6. **Member Questions**  
To deal with written questions by Members, relating to issues under the Committee's remit, with the maximum length of oral supplementary questions at Committee being no longer than one minute. Responses to any supplementary questions will be dealt with in writing if they cannot be dealt with at the meeting.
7. **Budget Consultation Feedback (Pages 17 - 52)**  
Purpose  
This report provides feedback to Cabinet from the recent consultation on the Administration's budget proposals.  
  
Recommendation(s)  
That Cabinet considers the feedback from the consultation.
8. **Parish and Town Council Election Costs (Pages 53 - 70)**  
Purpose  
This report sets out the proposal to consider the option of recharging the costs of elections to Town and Parish Councils. This would bring Cotswold District Council in line with all other Local Authorities across Gloucestershire and most in the South West, where Town and Parish Councils meet the costs associated with elections in their areas.  
  
Recommendation(s)
  - (a) That the Cabinet agrees to recharge Town and Parish Councils for contested 4-yearly elections at a rate of 50% of their share of the cost in 2023 and 100% of their share in 2027 and thereafter
  - (b) That the Cabinet agrees to recharge Town and Parish Councils for contested by-elections taking place on or after the dates shown at the rates indicated:
    - (i) from 01/04/2024 - 50% of the cost

- (ii) from 01/04/2025 - 75% of the cost
- (iii) from 01/04/2026 - 100% of the cost

9. **Review of Parking Charges and Season Tickets (Pages 71 - 92)**

Purpose

The report proposes changes to the charges, charging periods, season ticket allocation and season ticket fees in the District car parks.

Recommendation(s)

That Cabinet considers and approves:

- a) aligning charging periods for all car parks owned by the Council to 8am to 6pm on Mondays to Saturdays, removing the 'free after 3 pm' concession from six car parks;
- b) the removal of the four hour charging period in the Forum car park to encourage the use of the car park for short stay purposes;
- c) the proposal to align charges across the District over time;
- d) the proposed increases to charges in Church Street and West Street in Tetbury to improve the availability of parking spaces;
- e) the proposed increase to charges in Old Market Way in Moreton in Marsh to move towards alignment of car parking charges across the District;
- f) the introduction of charges for the large vehicle bays reserved for coaches and minibuses at the Mangersbury Road car park in Stow-on-the-Wold;
- g) that car park charges, are increased by 5% (rounded up to nearest 10p), to reflect the impact of inflation since April 2020;
- h) implementing a maximum season ticket allocation of 50% in each car park;
- i) removal of the Nursery permit;
- j) increasing the fee for season tickets as per Annex D, a higher than inflationary increase to reduce the level of subsidy offered for season tickets;
- k) reducing the season ticket fee for the Whiteway car park to reflect the fact that it can only be used Monday to Friday rather than Monday to Saturday as in the other Cirencester car parks;
- l) introducing three month and six month season tickets in the Whiteway car park in line with all other season tickets.
- m) the requirement to invest in the Council's car parks through its Capital Programme to be considered by Cabinet and Council in February 2022.
- n) an update the Parking Order to enable enforcement action to be taken for vehicles utilising parking spaces equipped with Electric Vehicle Charging Points in all Council owned car parks; and

o) delegating authority to consider the Parking Order consultation responses to the Deputy Chief Executive in consultation with the Deputy Leader of the Council and Cabinet Member for Finance.

**10. External Audit Contract (Pages 93 - 114)**

Purpose

To consider the options for procuring the Council's external audit services for the period from 2023/24 and to make a recommendation to the Council.

Recommendation(s)

a) That Cabinet considers the options for procuring the Council's external audit service for the period from 2023/24; and

b) Recommends to Council procurement through the National Procurement Framework using Public Sector Audit Appointments Ltd.

**11. Review of Council Tax Discounts (Pages 115 - 124)**

Purpose

To consider amendments to discounts for domestic properties that are empty and unfurnished from 1 April 2022.

Recommendation(s)

That Cabinet:

a) Approve amendments to a Class C discount from 1 April 2022; and,

b) That the discount be amended to 25% for a maximum of 6 months

**12. Discretionary Business Rate Relief Policy (Pages 125 - 152)**

Purpose

To consider the implementation of a Discretionary Rate Relief Policy in line with Section 47 of the Local Government Finance Act (1988).

Recommendation(s)

Cabinet is recommended to approve the Discretionary Rate Relief Policy at Annex A.

**13. Approval of the Approach to Litter Bin Placement and Renewal Programme in Cotswold District (Pages 153 - 162)**

Purpose

To update Members on the issues being experienced with litter and dog bins in Cotswold District and to seek approval for a bin placement review and renewal programme to be delivered over the next five years.

Recommendation(s)

That Cabinet:

a) Notes the risks and financial implications relating to the provision and servicing of the current litter and dog waste bins;

b) Approves the introduction of the set of principles for the placement of litter and dog waste bins going forward..

c) Approves the proposal to complete a rationalisation exercise of the existing litter and dog waste bins to ensure that the coverage is suitable for the District and that bins are

located in the most appropriate places and in line with the agreed set of principles referenced in b) above;

d) Approves the principle that a charging mechanism is introduced for installation and servicing of litter bins in Town and Parish Council areas which are outside of the principles proposed in recommendation b;

e) Supports the inclusion of an annual capital budget of up to £10,000 per annum over the next five years as part of the Council's budget setting process in February 2022 (up to £50,000 total), for bin purchases and fitting; and

f) That officers work with Ubico to identify the revenue savings arising from this rationalisation and, by agreement, seek to reduce the contract value accordingly.

**14. Broadband Delivery Update (Pages 163 - 170)**

Purpose

To update Members on progress in delivering high speed broadband across the District

Recommendation(s)

a) That progress in delivering high speed broadband across the District is noted.

b) That the £500k allocation for broadband in the capital budget set aside in 2016 remains in place.

c) That Officers work with Fastershire to draw up a top-up scheme for their existing Community Broadband Grant, for approval by Cabinet, to assist with delivery of broadband within the District that would otherwise not be viable.

d) That any requests for drawdown of the capital allocation in the meantime are subject to business case approval by Cabinet/Council as necessary.

e) That annual updates on broadband delivery within the District are brought to Cabinet.

**15. Use of the Internet and Social Media for Investigations and Enforcement Policy (Pages 171 - 180)**

Purpose

To present Cabinet with a new Use of the Internet and Social Media in Investigations and Enforcement Policy for adoption.

Recommendation(s)

That Cabinet:

a) Approves and adopts the Policy attached to this report and;

b) Authorise the Chief Executive to approve future minor amendments to the Policy in consultation with the Counter Fraud and Enforcement Unit, Legal Services and the Leader of the Council.

**16. Schedule of Decisions taken by the Leader of the Council and/or Individual Cabinet Members (Pages 181 - 182)**

**17. Issue(s) Arising From Overview and Scrutiny and/or Audit**

(END)



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## Minutes of a meeting of Cabinet held on Monday, 6 December 2021.

### Councillors present:

Tony Dale	Jenny Forde	Lisa Spivey
Andrew Doherty	Joe Harris - Chair	
Mike Evely – Vice Chair	Juliet Layton	

### Officers present:

Jan Britton, Managing Director, Publica  
Matthew Britton, Principal Planning Policy Officer  
Sarah Dalby, Electoral Services Manager  
Mandy Fathers, Business Manager (Operational Services)  
Caleb Harris, Strategic Support Officer  
Paul James, Economic Development Lead  
Jasper Lamoon, Senior Infrastructure Officer  
Claire Locke, Group Manager – Commissioning  
Ben Patel-Sadler, Senior Democratic Services Officer  
Jenny Poole, Deputy Chief Executive  
Rob Weaver, Chief Executive

### **53 Apologies**

Apologies were received from Councillor Rachel Coxcoon.

### **54 Declarations of Interest**

There were no declarations of interest from Members.

There were no declarations of interest from Officers.

### **55 Minutes**

RESOLVED that the Minutes of the meeting of Cabinet of 1 November 2021 be approved as a correct record.

Record of Voting – for: 7, against: 0, abstention: 0, absent: 1.

### **56 Chair's Announcements (if any)**

There were no announcements from the Chair.

## **57 Public Questions**

There was one public question in relation to agenda item 9 'Parish and Town Council Election Costs', specifically expressing a view that Town and Parish Councils had not been provided with an adequate opportunity to discuss the proposals outlined in the report and discuss these with residents.

RESOLVED that Cabinet agreed to defer taking a decision on agenda item 9 in recognition of the points raised by the public speaker and other Town and Parish Councils. The agenda item would be formally considered at the 10 January 2022 Cabinet meeting. This would enable dialogue to take place between the Council and Town and Parish Councils.

## **58 Member Questions**

A Member question in relation to Councillor attendance figures had been received from Councillor Patrick Coleman. A written response to the question had been provided in advance of the meeting.

Councillor Coleman asked a supplementary question regarding a member of the Council not attending a meeting for a period of six months.

Cabinet noted that a decision needed to be taken quickly and correctly regarding whether the Councillor should be disqualified from the Council under Section 85(2) of the Local Government Act 1972. This decision would be taken independently by Officers and following the provision of appropriate legal advice.

## **59 Financial, Council Priority and Service Performance Report - 2021-22 Quarter Two**

The Chief Executive introduced the report, covering his roles and responsibilities associated with the performance of the Council and what actions were currently being undertaken to mitigate areas where improvements in performance were required.

The Chief Executive summarised the key performance elements of the report.

The Deputy Chief Executive summarised the key financial aspects of the report.

Cabinet noted that the Overview and Scrutiny Committee had considered this report at their meeting on 30 November. Points of clarification had been sought around performance monitoring and Officers would be undertaking the necessary actions to address the comments made by the Committee.

In relation to planning, Cabinet noted that the validation process was now taking place in a more rapid and professional manner. Additional resources would make a positive difference to the Planning process but Cabinet recognised that this would take some time and that further work was required in this area.

In relation to the staff pay award, Cabinet noted that negotiations were continuing nationally. Additional provision to cover the potential staff pay award had been included in the proposed budget for 2022/23.

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Cabinet further noted that the provision of additional budget in this area would ensure that the Council could cover the agreed cost of living pay increases for staff (as and when it was agreed nationally).

Cabinet noted that enabling customers to self-serve, through the Council's website, for revenues and benefits services would relieve some of the pressure currently being experienced by staff working in this area. The option for self-service, known as the "Open Portal" would officially launch in early 2022, it would enable residents to self-service 24 hours a day, 365 days per year. Customers would be able to access their Council Tax accounts, benefits and business rates accounts. There would also be a move towards e-billing customers from March 2022.

Cabinet acknowledged the progression of staff from within customer services into other roles within the Council and Publica. This ensured that talented staff were retained and could further develop their professional careers within the business. The recruitment process for future staff would be analysed so that it could become more systematic rather than reactive.

Cabinet acknowledged the hard work undertaken by Officers during the Covid-19 pandemic and noted the progression made in many areas despite the challenging situation.

The Cabinet noted the additional work being undertaken by the planning department in respect of the increase in applications and the associated increase in revenue.

RESOLVED that Cabinet reviewed the overall progress on the Council priorities, service delivery and financial performance for 2021-22 Q2.

#### **60 Review of Grant Funding & Service Level Agreements for Existing Grant Maintained Visitor Information Centres**

Councillor Tony Dale introduced the report which Cabinet noted had been consultative in its approach.

Cabinet noted that the report sought to help inform how visitor information centres would physically serve communities going forwards both throughout and post the Covid-19 pandemic.

Cabinet acknowledged the importance of ensuring that a full picture of data was available so that longer-term decisions could be taken around the physical provision of visitor centres across the district. A view was expressed that an 18-month extension to the existing arrangements given the current Covid-19 pandemic was a responsible and sensible approach before a more strategic decision could be taken.

Councillor Tony Dale proposed that Cabinet accepted the recommendations as outlined in the report. This was seconded by Councillor Mike Evemy.

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RESOLVED that Cabinet:

1) Approved to continue to provide financial grants at current levels to the four existing grant maintained Visitor Information Centres for an 18-month period. Total financial commitment of £81,000 (1/4/22 – 30/9/23).

2) Agreed to use the 18 month period as an opportunity to baseline and work with the current Centres to trial a change to a criteria-based commissioned grant system with key objectives relevant to the town/village and helping towards the Council & Cotswolds Tourism objectives.

3) Agreed to have a longer term aim to shift Visitor Information Centre provision to being proactive, digitally enabled and working to improve the visitor economy of the local town/village and surrounding area.

**Record of Voting – for: 7, against: 0, abstention: 0, absent 1.**

#### **61 Parish and Town Council Election Costs**

Councillor Mike Every introduced the report and informed Cabinet that as outlined earlier in the meeting, this item would be deferred to the 10 January 2022 Cabinet meeting so that additional consultation with Town and Parish Councils could take place.

Cabinet further noted that likely, indicative costs associated with these proposals would be shared with Town and Parish Councils.

RESOLVED that further to the public question posed earlier during the meeting and the feedback received from Town and Parish Councils, this item be deferred to the 10 January 2022 Cabinet meeting so that a consultation with Town and Parish Councils could take place between now and that meeting.

#### **62 Local Plan and Community Infrastructure Levy - Update**

The Principal Planning Policy Officer introduced the report with Cabinet noting the suite of documents which comprised the report.

Cabinet noted the importance of retaining commercial property, avoiding instances of them being converted to housing.

Cabinet expressed a view that the methods of reporting SIL funding and how Section 106 monies were spent was helpful.

The Principal Planning Policy Officer noted the grammatical changes which were required in relation to the report.

Cabinet noted that rigorous processes and procedures were in place to help determine exactly how local plan funding was allocated and spent. This helped to ensure that Taxpayers received value for money and that a transparent process was in place.

Cabinet noted the importance of seeking nominations from each political group for the places on the Local Plan Board. These positions did not need to be politically balanced, reflecting the

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political balance of the Council. The existing names of Members would be removed from the report.

Cabinet agreed that the updating of the local plan would assist the Council to deliver net-zero carbon solutions around housing and transport and to further enable sustainability across the District. It also offered local residents the opportunity to participate in the consultation associated with the updating of the plan.

Cabinet acknowledged the work of Officers and Councillor Rachel Coxcoon in updating the forward plan and all efforts behind delivering net-zero carbon across the District to help deliver against the climate emergency.

In relation to infrastructure updates, Cabinet noted that these could be undertaken as often as the Council wished to do so (on an evidence-based basis). This could be done on an annual basis if required.

Councillor Joe Harris proposed that the Cabinet agreed to the recommendations as outlined in the report.

This was seconded by Councillor Lisa Spivey.

RESOLVED that Cabinet:

- a) Approves Annexes (A) and (B) for a public consultation in accordance with the Council's Statement of Community Involvement;
- b) Grants delegated authority to the Cabinet Member for Climate Change and Forward Planning to agree any minor amendments, including refining consultation questions, and typographical changes to Annexes (A) and (B) ahead of the public consultation;
- c) Approves CIL governance framework (Annex C);
- d) Notes the publication of the data in the CIL and SI06 reports of the Infrastructure Funding Statement (Annex D);
- e) Approve the publication of the Infrastructure List (contained in part one of the Infrastructure Funding Statement - Annex D);
- f) Approves updated Terms of References for the Local Plan and Cirencester Town Centre Masterplan Programme Boards (Annexes E and F); and
- g) Approves drawdown of £108,000 from the Council Priorities Fund reserve to initiate and / or remunerate programmes of work identified in paragraph 7.4. Commitment and resolves to use its various communications with businesses in the District to sign up to it and commit to reducing their carbon emissions.

**Record of Voting – for: 7, against: 0, abstention: 0, absent: 1.**

**63 Green Economic Growth Strategy - Six Monthly Update**

Councillor Tony Dale introduced the report, highlighting progress across the Green Economic Growth Strategy.

A number of visits had been undertaken by Officers and Councillor Tony Dale to liaise with organisations and businesses so that the progress being made in relation to the provision of further employment opportunities could be understood.

RESOLVED that Cabinet noted progress in delivering the Green Economic Growth Strategy.

**64 Options for Parking Enforcement**

Councillor Mike Every introduced the report and informed Cabinet that a decision was required in relation to how parking enforcement across the District was delivered.

It was recommended that the Council bring this service back in-house to deliver a strong customer focus and provide the Council with additional flexibility with regard to the service.

The Officers would be working directly for the Council when undertaking their duties.

Cabinet noted the importance of achieving value for money in this area. Bringing the service back in-house would deliver a revenue saving although the Council would need to determine whether vehicles for use by the Enforcement Officers should be bought or leased. Decisions would also be taken on whether the vehicles would be electric or hybrid.

Cabinet expressed a view that a pragmatic approach was required where Officers working in this area could provide visitors and the local community with a wider service in relation to local advice and guidance rather than just fulfilling an enforcement role.

Staff transferring across from APCOA Parking would commence employment with Publica.

Councillor Mike Every proposed that Cabinet agreed the recommendations as set out in the report.

This was seconded by Councillor Joe Harris.

RESOLVED that:

- a) Cabinet agrees to bring the Enforcement service back in-house.
- b) Cabinet delegates to the Deputy Chief Executive in consultation with the Deputy Leader and Cabinet Member for Finance, the decision on whether to lease or buy the vehicles associated with this decision and approves the allocation of £45,000 from the Electric Vehicle Charging point budget within the Capital Programme to fund the purchase if necessary;
- c) Cabinet approves an allocation of £12,000 from the Council Priorities Fund to fund the start-up costs for the in-house service.

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Record of Voting – for: 7, against: 0, abstention: 0, absent: 1.

**65 The Future Use of Cotswold District Council's Offices at Trinity Road, Cirencester**

Councillor Mike Every introduced the report with Cabinet noting that the Covid-19 pandemic had resulted in a new pattern of hybrid working, with less office space now required going forwards.

The report had summarised approximately 11 options for the future use of Trinity Road. Carbon feasibility work had also been undertaken in relation to the options presented in the report.

Cabinet noted the associated costs of works should the Council choose to retain a permanent base at Trinity Road. Some of these options would require a significant capital outlay with a long payback period.

Cabinet noted that the recommendations delivered the most cost-effective and practical way of ensuring the Council retained a presence in the building going forwards whilst utilising the remaining space, delivering carbon savings and achieving rental/lease income.

Cabinet noted that staff working in Trinity Road had been consulted on the proposals.

Cabinet recognised that this work represented an opportunity to improve the facilities for staff working from the site.

Work on implementation project plan would be undertaken if the report's recommendations were agreed by the Cabinet. The schedule of works and associated likely impacts would be mapped out and shared with staff and Members as soon as it was completed.

Cabinet noted the difficulties in retrofitting older buildings with carbon reducing technology.

Councillor Mike Every proposed that Cabinet agreed the recommendations as set out in the report.

This was seconded by Councillor Joe Harris.

RESOLVED that Cabinet agreed that:

- a) Based on the high level option appraisal, the Council reduces its occupation of the Offices and actively markets the estimated 30 - 40% spare space generated for commercial tenants, providing both revenue savings and a revenue return for the Council.
- b) A further report setting out capital costs to make changes to building configuration, access, security etc. would be presented to the Cabinet once the final allocation of Council services to specific space within the building is agreed.
- c) Funding of up to £13,000 is allocated from the Council Priorities Fund earmarked reserve to fund a feasibility study to assess options for roof repairs or replacement, incorporating options for insulation and reduction in heat loss, and that a further report is brought back to the Cabinet.

d) To support implementation of option 2a, £308,000 of capital funding is included as part of the forthcoming budget setting process to fund works to install solar PV, lighting and smaller measures in the Office buildings which should achieve a reduction in Carbon emissions of approximately 59CO<sub>2</sub>t per year (20%).

e) A 20% contingency sum is allocated for recommendation (d) £62,000 to allow for equipment or installation costs above estimates or unforeseen works with authority delegated to the Deputy Chief Executive in consultation with the Deputy Leader and Cabinet Member for Finance to draw on that funding.

**Record of Voting – for: 7, against: 0, abstention: 0, absent: 1.**

#### **66**      **Cotswold Club**

Councillor Mike Every introduced the report, with Members noting the club had been vacant since September 2020. Cabinet noted the significant investment required if the building was to be brought back in to use.

Cabinet noted it was not feasible for the Council to convert the building for any community/business purpose due to the nature and costs of the works required and the specific community or business organisations requirements.

Cabinet noted that the appropriate option in the case of this building was disposal with other options not being financially or practically viable.

Cabinet wished to place on record their thanks to the trustees of the Cotswold Club who had endeavoured to make it a successful venture.

Councillor Mike Every proposed that Cabinet agreed the recommendations as set out in the report.

This was seconded by Councillor Lisa Spivey.

**RESOLVED** that Cabinet agreed that:

a) The Cotswold Club be marketed for disposal in existing condition as set out within the report; and

b) Capital receipts from the sale be earmarked for investment in carbon zero affordable housing developments on other sites in the District.

c) The Deputy Chief Executive in consultation with the Monitoring Officer and Deputy Leader and Cabinet Member for Finance have delegated authority to agree the final terms for the disposal of the property.

**Record of Voting – for: 7, against: 0, abstention: 0, absent: 1.**

#### **67**      **Schedule of Decisions taken by the Leader of the Council and/or Individual Cabinet Members**

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RESOLVED that Cabinet noted the Schedule of Decisions taken by the Leader of the Council and/or Individual Cabinet Members.

**68 Issue(s) Arising From Overview and Scrutiny and/or Audit**

There were no issues arising from Overview and Scrutiny and/or Audit.

The Meeting commenced at 6pm and closed at 08:07pm

Chair

(END)

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Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET – 10 JANUARY 2022</b>
Report Number	<b>AGENDA ITEM 7</b>
Subject	<b>BUDGET CONSULTATION FEEDBACK</b>
Wards affected	ALL
Accountable member	Cllr Mike Evely, Deputy Leader and Cabinet Member for Finance Email: <a href="mailto:Mike.Evely@cotswold.gov.uk">Mike.Evely@cotswold.gov.uk</a>
Accountable officer	Jenny Poole, Deputy Chief Executive Email: <a href="mailto:Jenny.Poole@cotswold.gov.uk">Jenny.Poole@cotswold.gov.uk</a>
Summary/Purpose	This report provides feedback to Cabinet from the recent consultation on the Administration's budget proposals.
Annexes	Annex A – Responses to the online survey Annex B – Comments on Council Priorities or any other aspect of the Council's spending and service delivery Annex C – Email and letter responses to the budget consultation
Recommendation/s	<i>That Cabinet considers the feedback from the consultation.</i>
Corporate priorities	The budget set out the financial envelope for the Cotswold District Council Corporate Plan, which details how the Council will deliver against all of its adopted aims, priorities and principles.
Key Decision	No
Exempt	No
Consultees/ Consultation	The Council used a wide range of communications channels to share the key budget messages and highlight the consultation to as many residents, businesses and community organisations as possible, encouraging them to take part. This included: <ul style="list-style-type: none"> <li>a) An edition of Cotswold News which was delivered to all households across the District</li> <li>b) The use of social media including Facebook, Twitter and Nextdoor and local social media groups</li> <li>c) The use of a video with the Deputy Leader explaining the Council's budget</li> <li>d) The use of an animated video explaining budget proposals</li> <li>e) Promotion via the Council's website homepage and banner</li> </ul>



	<p>f) Media engagement with a release at the start and end of consultation</p> <p>g) A bespoke webpage covering key messages and linking to an online survey</p> <p>h) Promotion through Town and Parish Councils</p> <p>i) Promotion in the Council's new E-newsletter</p> <p>j) Promotion to staff and Councillors through internal communications and the Council's Overview and Scrutiny Committee.</p> <p>This was complemented by engagement, both online and in person including:</p> <p>k) A budget special edition of the regular CDC Live programme</p> <p>l) A webinar with the Deputy Leader and Cabinet Member for Finance</p> <p>m) Opportunity for discussion at the Parish Council fora</p> <p>n) Stands in Cirencester, Bourton-on-the-Water, Moreton-in-Marsh and Tetbury.</p>
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## **1. BACKGROUND**

- 1.1.** Cabinet considered a refresh of the Council's Medium Term Financial Strategy (MTFS) and draft budget proposals for 2022/23, as a basis for consultation with the community, on 4 October 2021. This report sets out feedback from the consultation for Cabinet to consider.
- 1.2.** In October 2021, the Government announced the outcome of the Spending Review 2021. The Spending Review covers the three year period from 2022/23 to 2024/25. The Spending Review sets out the spending limits for Government departments and enables the Department for Levelling Up, Homes and Communities (DLUHC) to determine the funding for individual local authorities. This funding was set out in the Provisional Local Government Finance Settlement on 16 December 2021 for 2022/23, a one year settlement. Following a four week consultation period, DLUHC will issue the Final Local Government Finance Settlement in January 2022.
- 1.3.** In January 2022, the Chief Finance Officer will update the MTFS and 2022/23 budget with the outcome of the Local Government Finance Settlement, along with any further adjustments identified since Cabinet considered the draft budget in October.
- 1.4.** Cabinet will consider the MTFS and 2022/23 budget on 7 February 2022. Cabinet will recommend the MTFS, 2022/23 budget and the associated Capital, Investment and Treasury Management Strategies to the Council on 16 February 2021.

## **2. MAIN POINTS**



- 2.1.** Consultation on the draft budget proposals ran from 5 October to 19 November 2021. The Council used a wide range of communications channels to share the key budget messages and highlight the consultation to as many residents, businesses and community organisations as possible, encouraging them to take part. This included:
- 2.1.1.** An edition of Cotswold News which was delivered to all households across the District
  - 2.1.2.** The use of social media including Facebook, Twitter and Nextdoor and local social media groups
  - 2.1.3.** The use of a video with the Deputy Leader explaining the Council's budget
  - 2.1.4.** The use of an animated video explaining budget proposals
  - 2.1.5.** Promotion via the Council's website homepage and banner
  - 2.1.6.** Media engagement with a release at the start and end of consultation
  - 2.1.7.** A bespoke webpage covering key messages and linking to an online survey
  - 2.1.8.** Promotion through Town and Parish Councils
  - 2.1.9.** Promotion in the Council's new E-newsletter
  - 2.1.10.** Promotion to staff and Councillors through internal communications and the Council's Overview and Scrutiny Committee.
- 2.2.** This was complemented by engagement, both online and in person including:
- 2.2.1.** A budget special edition of the regular CDC Live programme
  - 2.2.2.** A webinar with the Deputy Leader and Cabinet Member for Finance
  - 2.2.3.** Opportunity for discussion at the Parish Council fora



- 2.2.4. Stands providing an opportunity for the community to discuss the budget consultation in Cirencester, Bourton-on-the-Water, Moreton-in-Marsh and Tetbury.

### Budget Consultation Outcomes

- 2.3. The Council received 432 responses to the consultation, an increase of 106 responses from the consultation last year. Feedback to the quantitative survey questions is included at **Annex A**. Comments on the Council priorities or any other aspect of the Council's spending and service delivery is included at **Annex B**. In addition to the online survey, the Council has also received various other correspondence, included at **Annex C**.
- 2.4. The main findings from the consultation are set out below.

### **Question 1**

- 2.5. *Over the next three years, the Council expects the Government to cut the Council's funding. At the same time, there will be unavoidable increases in costs such as nationally agreed staff pay rises which the Council will have to fund. Our approach to the Council's finances is to improve our services while delivering on our priorities of doing our part to tackle the climate emergency, delivering homes local people can afford to rent and supporting our economy recover from the impact of Covid-19, all whilst balancing the ongoing budget. That will require small increases in Council Tax (see question 3) together with generating more money from new investments and by applying a principle of setting our fees and charges to ensure they are not subsidised by other taxpayers. Where the Council does decide to subsidise some fees and charges, the reasons for this will be clearly set out. To what extent do you agree with this approach?*
- 2.6. The response was positive to this question. 43% agreed or strongly agreed with the Council's approach. This compares with 37% who disagreed or strongly disagreed and 20% who neither agreed nor disagreed.

### **Question 2**

- 2.7. *The Council is planning to invite local people and communities to invest directly in initiatives in the Cotswold District that address climate change by lending funds to the Council for a specified period of time and at a specified rate of interest. Amongst other things, this could include investment in renewable energy which could provide a financial return for local communities and actions to reduce the energy use of our homes. Do you think this is a good idea?*
- 2.8. The response was positive to this question. 57% agreed this was a good idea, 29% disagreed and 14% did not know.



### Question 3

- 2.9. *To support our priorities, and help close the expected funding gap from the Government, we plan to increase Council Tax by 10p a week (£5 a year) for a Band D property (£3.33 for Band A – up to £10 for Band G). Do you agree with this approach?*
- 2.10. The response was positive to this question. 56% agreed or strongly agreed with the proposed Council Tax increase. 34% disagree or strongly disagree while 10% neither agree nor disagree.

### Question 4

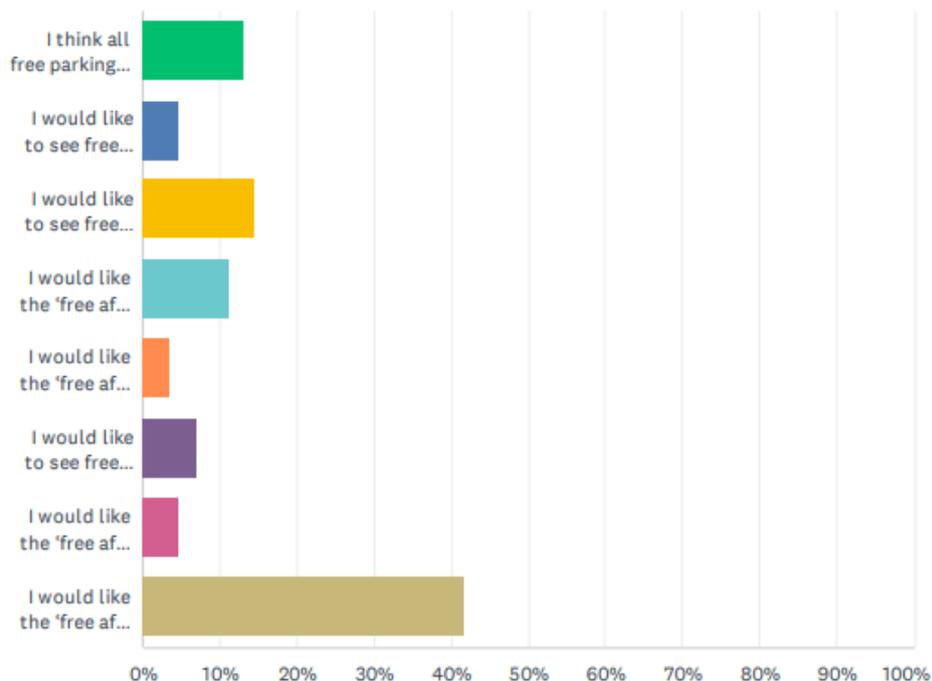
*We have reviewed charges and charging periods in our car parks in light of our overall charging policy and identified the revenue we could generate where we are currently providing free parking – under our ‘Free After Three’ scheme running in six car parks across the District (£350,000), on Sundays at all our car parks except ones in Bourton-on-the-Water and Stow-on-the-Wold (£150,000), and during evenings and overnight in all our car parks (£100,000). Our 2022/23 proposed budget includes increased revenue of £300,000 from our car parks to help us balance our budget. Could you tell us your view on potential changes to charging periods by selecting one of these statements?*

- a. I think all free parking in the Council’s car parks should be removed
  - b. I would like to see free Sunday parking remain but think charges should be made after 3pm in all car parks and during evenings and overnight
  - c. I would like to see free parking remain on Sundays, during evenings and overnight but think charges should be made between 3pm and 6pm in all car parks
  - d. I would like the ‘free after 3pm’ scheme and free evening and overnight parking to continue but think charges should be made on Sundays
  - e. I would like the ‘free after 3pm’ scheme to continue but think charges should be made on Sundays and during evenings and overnight
  - f. I would like to see free parking remain during evenings and overnight but think charges should be made between 3pm and 6pm and on Sundays
  - g. I would like the ‘free after 3pm’ scheme and free parking on Sundays to remain but I think charges should be made during evenings and overnight
  - h. I would like the ‘free after 3pm’ scheme to continue and for parking to remain free on Sundays and during evenings and overnight
- 2.11. The table below sets out the responses to this question and the response information is also illustrated graphically.



	<b>Answer Choice</b>	<b>Response %</b>	<b>Response No.</b>
a	I think all free parking in the Council's car parks should be removed	13.02	56
b	I would like to see free Sunday parking remain but think charges should be made after 3pm in all car parks and during evenings and overnight	4.65	20
c	I would like to see free parking remain on Sundays, during evenings and overnight but think charges should be made between 3pm and 6pm in all car parks	14.42	62
d	I would like the 'free after 3pm' scheme and free evening and overnight parking to continue but think charges should be made on Sundays	11.16	48
e	I would like the 'free after 3pm' scheme to continue but think charges should be made on Sundays and during evenings and overnight	3.49	15
f	I would like to see free parking remain during evenings and overnight but think charges should be made between 3pm and 6pm and on Sundays	6.98	30
g	I would like the 'free after 3pm' scheme and free parking on Sundays to remain but I think charges should be made during evenings and overnight	4.65	20
h	I would like the 'free after 3pm' scheme to continue and for parking to remain free on Sundays and during evenings and overnight	41.63	179
	<b>Responses</b>		<b>430</b>

Answered: 430 Skipped: 2



2.12. While 42% of respondents wanted no change to the current car park charging periods (answer h) 58% of respondents supported a change. The options for change, listed in order of the number of responses, are set out below:

	Answer Choice	Response %	Response No.
c	I would like to see free parking remain on Sundays, during evenings and overnight but think charges should be made between 3pm and 6pm in all car parks	14.42	62
a	I think all free parking in the Council's car parks should be removed	13.02	56
d	I would like the 'free after 3pm' scheme and free evening and overnight parking to continue but think charges should be made on Sundays	11.16	48
f	I would like to see free parking remain during evenings and overnight but think charges should be made between 3pm and 6pm and on Sundays	6.98	30
b	I would like to see free Sunday parking remain but think charges should be made after 3pm in all car parks and during evenings and overnight	4.65	20



g	I would like the 'free after 3pm' scheme and free parking on Sundays to remain but I think charges should be made during evenings and overnight	4.65	20
e	I would like the 'free after 3pm' scheme to continue but think charges should be made on Sundays and during evenings and overnight	3.49	15

- 2.13. The budget consultation requested feedback on options for removing free car parking in the evenings and overnight, between 3 pm and 6 pm and on Sundays. The number of respondents supporting each of these options is set out below :

	Charge for evenings and overnight	Charge between 3 pm and 6 pm	Charge on Sundays
c		62	
a	56	56	56
d			48
f		30	30
b	20	20	
g	20		
e	15		15
	111	168	149

- 2.14. The option which had the greatest support from respondents was to charge between 3 pm and 6 pm in all car parks with support from 168 respondents. Charging on Sundays in all car parks received support from 149 respondents with 111 respondents supporting charging during evenings and overnight.
- 2.15. Proposals for changes to the Council's car park charges, to come into effect from April 2022, will be considered later in this meeting of the Cabinet.
- 2.16. A response from Fairford Town Council is included in **Annex B** (line number 4). Responses were also received from Tetbury Town Council, two Tetbury Town Councillors, Weston sub Edge Parish Council and a Cirencester resident. Details of these responses are included at **Annex C**.



**3. FINANCIAL IMPLICATIONS**

- 3.1. There are no financial implications arising from this report. Any changes to the 2022/23 budget arising from consideration of the consultation feedback will be included in the report to Cabinet on 7 February 2022.

**4. LEGAL IMPLICATIONS**

- 4.1. There are no legal implications arising from this report.

**5. RISK ASSESSMENT**

- 5.1. A detailed risk assessment will form part of the Cabinet report in February 2022 regarding the MTFS and 2022/23 budget proposals.

**6. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

- 6.1. There are no direct climate or ecological implications arising from this report. The budget proposals are related to the Council priorities which include the climate and ecological emergency declarations.

**7. ALTERNATIVE OPTIONS**

- 7.1. This report provides the Cabinet with the opportunity to consider amendments to the budget proposals for 2022/23 or longer term in the Medium Term Financial Strategy. Any changes to the 2022/23 budget arising from consideration of the consultation feedback will be included in the report to Cabinet on 7 February 2022.

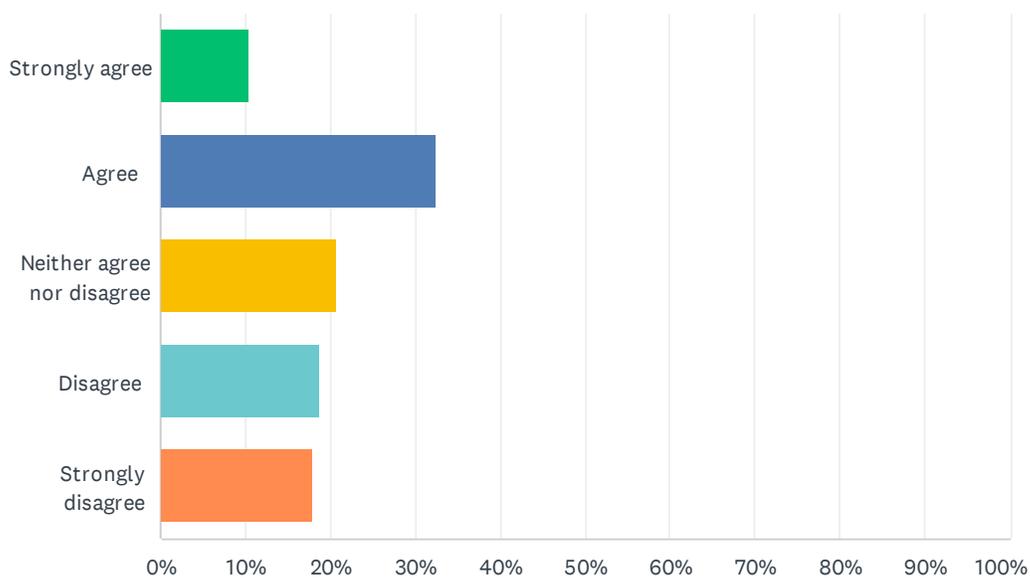
**8. BACKGROUND PAPERS**

- 8.1. None

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Q1 Over the next three years, the Council expects the Government to cut the Council’s funding. At the same time, there will be unavoidable increases in costs such as nationally agreed staff pay rises which the Council will have to fund. Our approach to the Council’s finances is to improve our services while delivering on our priorities of doing our part to tackle the climate emergency, delivering homes local people can afford to rent and supporting our economy recover from the impact of Covid-19, all whilst balancing the ongoing budget. That will require small increases in Council Tax (see question 3) together with generating more money from new investments and by applying a principle of setting our fees and charges to ensure they are not subsidised by other taxpayers. Where the Council does decide to subsidise some fees and charges, the reasons for this will be clearly set out. To what extent do you agree with this approach?

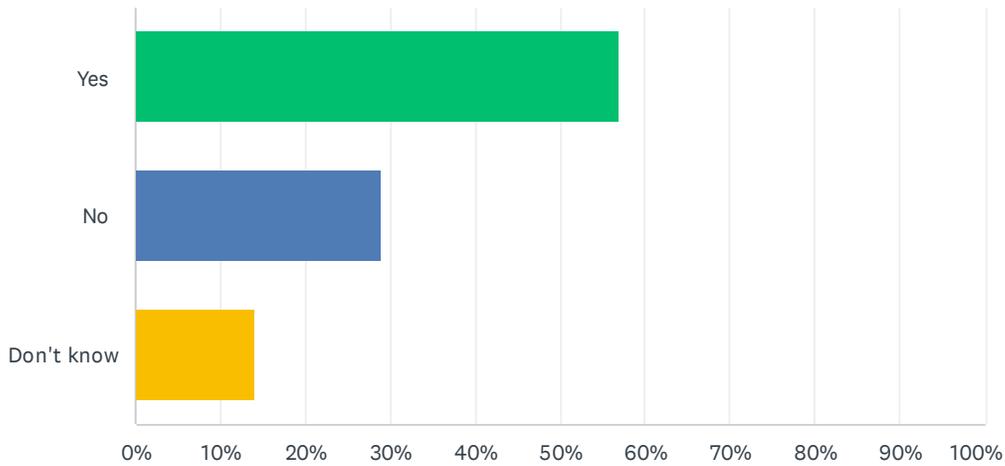
Answered: 432 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	10.42%	45
Agree	32.41%	140
Neither agree nor disagree	20.60%	89
Disagree	18.75%	81
Strongly disagree	17.82%	77
Total Respondents: 432		

Q2 The Council is planning to invite local people and communities to invest directly in initiatives in the Cotswold District that address climate change by lending funds to the Council for a specified period of time and at a specified rate of interest. Amongst other things, this could include investment in renewable energy which could provide a financial return for local communities and actions to reduce the energy use of our homes. Do you think this is a good idea?

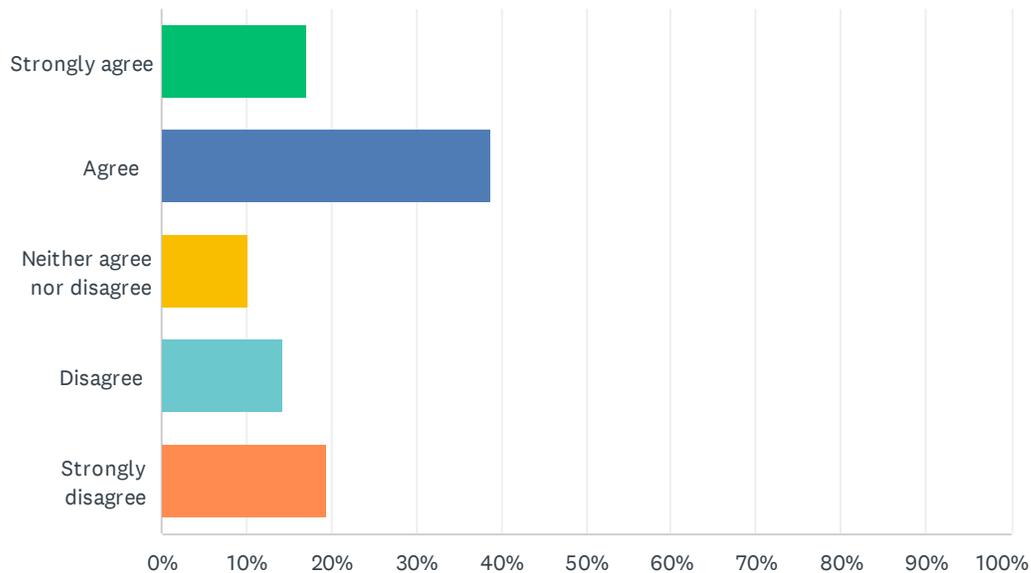
Answered: 432 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	56.94%	246
No	28.94%	125
Don't know	14.12%	61
Total Respondents: 432		

Q3 To support our priorities and help close the expected funding gap from the Government, we plan to increase Council Tax by 10p a week (£5 a year) for a Band D property (£3.33 for Band A - up to £10 for Band G). Do you agree with this approach?

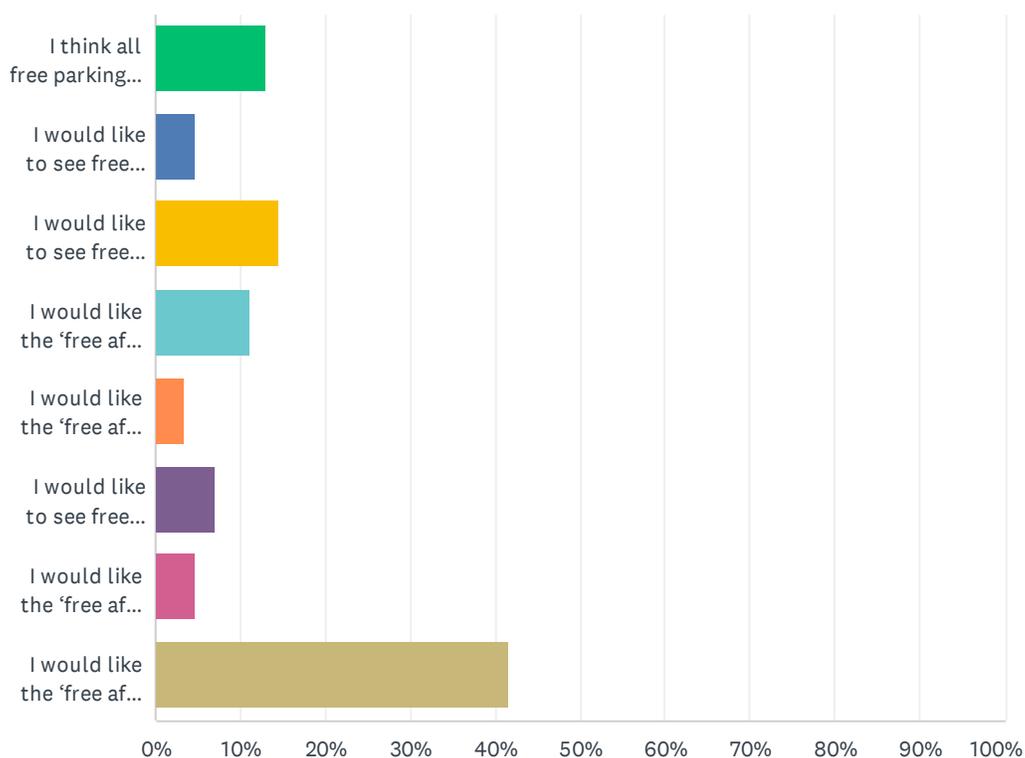
Answered: 432 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	17.13%	74
Agree	38.89%	168
Neither agree nor disagree	10.19%	44
Disagree	14.35%	62
Strongly disagree	19.44%	84
Total Respondents: 432		

Q4 We have reviewed charges and charging periods in our car parks in light of our overall charging policy and identified the revenue we could generate where we are currently providing free parking – under our ‘Free After Three’ scheme running in six car parks across the District (£350,000), on Sundays at all our car parks except ones in Bourton-on-the-Water and Stow-on-the-Wold (£150,000), and during evenings and overnight in all our car parks (£100,000). Our 2022/23 proposed budget includes increased revenue of £300,000 from our car parks to help us balance our budget. Could you tell us your view on potential changes to charging periods by selecting one of these statements:

Answered: 430 Skipped: 2



ANSWER CHOICES	RESPONSES	
I think all free parking in the Council's car parks should be removed	13.02%	56
I would like to see free Sunday parking remain but think charges should be made after 3pm in all car parks and during evenings and overnight	4.65%	20
I would like to see free parking remain on Sundays, during evenings and overnight but think charges should be made between 3pm and 6pm in all car parks	14.42%	62
I would like the 'free after 3pm' scheme and free evening and overnight parking to continue but think charges should be made on Sundays	11.16%	48
I would like the 'free after 3pm' scheme to continue but think charges should be made on Sundays and during evenings and overnight	3.49%	15
I would like to see free parking remain during evenings and overnight but think charges should be made between 3pm and 6pm and on Sundays	6.98%	30
I would like the 'free after 3pm' scheme and free parking on Sundays to remain but I think charges should be made during evenings and overnight	4.65%	20
I would like the 'free after 3pm' scheme to continue and for parking to remain free on Sundays and during evenings and overnight	41.63%	179
Total Respondents: 430		

**Q5 Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?**

Answered: 230 Skipped: 202

	Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?
1	Continue cash payment parking machines in all Ciren car parks please
2	I think free after 3 is a brilliant initiative. It spreads out parking during the day, thus maximising usage of the car parks. It also attracts shoppers to Cirencester and stops people trying to park for free on the streets. Also, it provides an alternative for those who don't want to or cannot pay by card under the new system. I'm not convinced your climate change policy is effective. For instance, you may wish to look at the extremely onerous conditions for installing a charging point for a listed building.
3	Not sure having only recently produced a local plan that a small fortune is planned to update it already. Think this money could be better spent right now and wait until whether or not a national park is going ahead or not
4	<p>Comments on CDC MTFs and Budget Proposals (Paragraphs are numbered for ease of reference)</p> <ol style="list-style-type: none"> <li>1. There are clearly challenges in the current economic climate, not least due to the combined impacts of Brexit and COVID-19, together with rising inflation.</li> <li>2. However, the strategy seems dominated by uncertainties including over Government settlement (t.b.a. November/December) and what may be proposed to replace New Homes Bonus.</li> <li>3. It is also difficult to see the whole picture and comparison with current and previous years (including before COVID-19).</li> <li>4. Presumably CDC is consulting now because they are receptive to comments on the priorities and strategy proposed.</li> <li>5. Heritage protection and development control may appear to be lower priority at the present time, but they are important contributors to the both the attractiveness and quality of the visitor economy offering and hence the sustainability of the local economy in smaller market towns such as Fairford. They are also statutory obligations and not 'discretionary'. Inadequate attention to applying planning policies effectively now is likely to lead to permanent detriment to these vital resources.</li> <li>6. This is an important part of an overall 'Green Tourism' strategy. This is part of "a Local Plan that is Green to the core".</li> <li>7. CDC is allocating £740k to support the Local Plan Review, but with changes to the National Planning framework and policies, there are other activities that will need resourcing to support the above, so we would question whether this is sufficient. These activities will include the development of local design codes and, arguably, Conservation Area Appraisals and Management Plans to provide a sound basis for the latter. Historic England are already calling for this as a basis for plans for new development in or near Conservation Areas. It should be noted that a lot of the work towards producing these is likely to be done by local communities, and therefore there is the potential for a high level of 'gearing' of CDC resource.</li> <li>8. The potential 'clawing back' by central Government of a larger share of Business Rates (contrary to the recommendations of the 2018 Parliamentary report – ref. <a href="https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/552/552.pdf">https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/552/552.pdf</a>) through re-basing obviously dilutes the incentive to promote development of the local economy, including green tourism, as well as having a direct financial impact. (See also NAO report: <a href="https://www.nao.org.uk/report/the-local-government-finance-system-in-england-overview-and-challenges/?utm_source=rss&amp;utm_medium=rss&amp;utm_campaign=the-local-government-finance-system-in-england-overview-and-challenges">https://www.nao.org.uk/report/the-local-government-finance-system-in-england-overview-and-challenges/?utm_source=rss&amp;utm_medium=rss&amp;utm_campaign=the-local-government-finance-system-in-england-overview-and-challenges</a>).</li> <li>9. We support the appointment of a permanent 'resource' to support economic growth in the District, although we would note that the work so far carried out appears to have been of a short-term nature, facilitating the distribution of central government funding packages. This business support activity is a 'discretionary' function, although it seems to have been well received. Fairford Town Council is grateful for the support the Town has received under the Welcome Back Fund. This is understandable in the context of recovery from COVID-19. Unfortunately, the Heartfood report did not base its suggestions for smaller market towns on a proper analysis of the state and potential of services and the local economy in the towns such as Fairford, which are growing but with only limited facilities, and where there is the potential for exploiting local green tourism (including Water Park holiday developments) more effectively. We therefore think the focus needs to be more strategic going forward, in line with CDC's statutory planning function.</li> <li>10. We wonder to what extent the Publica arrangement has had an impact on the ability to attract good quality staff for key functions, although there may not be much that can be done about this in the short term.</li> </ol>
5	Climate change should be the top priority. Flood defences important.
6	Introduce a paid residents parking permit for all sheep street in stow
7	Surely CDC can secure central government funding for green issues instead of borrowing from residents. Also, why spend so much on local studies (ie new expensive jobs) when national information must be available and can be acted upon now. Has any consideration been given to the loss of Business that could occur by increased car parking charges after 3pm?
8	I am not happy that the council is using my hard earned money for unproven investments and the salaries and pensions of extra consultants to further its schemes.
9	do not spend on green initiatives. too big a problem for cdc to have any affect.
10	Cost of living is rising, we also have to do everything we can to preserve the local economy and parking charges must stay as is and Council Tax frozen.
11	Services have to be paid for and the users must do so. Tourism has become a scourge for many Cotswold Villages and Towns and ALL financial support for Tourism activities should stop and the businesses involved should provide the funding if they wish to. Whilst there are complaints from some businesses arising from the Covid Pandemic the majority of the Hospitality businesses have never had it so good and are having the best financial time ever. Council funds in the future must be spent on essential services and the residents to improve their lives. Thought should also be given to the huge numbers of holiday let and Airbnb accommodation that has grown so fast in the last few years and it is now starving local young people of housing. We cannot have a situation where over 20% of local property is for holiday usage, it is plain wrong and need action within the planning rules.

12	The 'Climate Emergency' is a contentious issue with scores of experts in disagreement with current doom-laden forecasts. If the Council deems it a funding priority, especially in the face of other priorities that exist in the here and now, it must publish its evidence - other than models - to prove that there is such an emergency.
13	Like the idea to invest in community renewables. I think there should be a small evening fee e.g £1 flat fee.
14	Moreton in marsh. Paint designated parking bays for roadside parking. There's too many poorly parked cars taking up two parking spots. On the upper High Street where I live some motorists use the parking bays for long term stays - taking the train to London and returning 2-7 days later. Can signs be erected discouraging this? 'Parking here is for short 2 hour stays and residential parking. For long term parking please use designated car parks'
15	Think council collection of large items should be better advertised with the hope it might stop some of the fly tipping and HUGE fines for anyone caught doing it.
16	I believe the amounts proposed for climate related policies is absurdly high compared to the amount being proposed for many other things. For example, support for the homeless/people at risk of homelessness should take a higher priority and therefore slice of the budget. Lets start by helping people who need it now, as opposed to potentially nugatory effort on climate niceties.
17	I'm not sure it is legal for the Council to propose increasing car park charges to balance the budget
18	provide free parking or watch the town die, how much profit is made after all expenses

	ANNEX B
	Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?
19	More effort to bring in shops for locals - clothes etc. Too many antique shops (tetbury) and have to go elsewhere to shop for many products. improve and increases bus services
20	Disagree with card only car park machines - too difficult to use - it would be better to have a choice of cash or card. Please consider a trial of free after 3pm on evenings - Sunday parking - charging at all times will have an impact on business.
21	pay for every day except Market Day in Moreton. Zebra crossing in Dalverton Place, bus safety. More for youth, scout troupe. Road Closure on market days. Wildlife - bats, bees, bird boxes and natural habitats for biodiversity
22	textiles recycling is more than clothes it should be clear that it can be scraps from sewing etc. as I was told that is possible by email
23	happy with all aspects
24	Dependence on GCC increases to Council Tax
25	Be a little 'grey' not just Black or White, as different criterias across the Cotswold - i.e. hamlets, small village, large village, town
26	Waste receptacles overflowing with rubbish - Cotswold Avenue. Road sweeping more frequently in winter. Repairs needed to Market Place.
27	Residents parking: having to buy a permit in Purley Road but it doesn't cover 24/7
28	There should be a small charge between 3-6pm. £1 for 3pm to 6pm.
29	Would like to see meaningful consultation over the spending of car park tax
30	cashless parking is not currently working

31	First 30 minutes parking should be free. Moreton people don't park in centre. Walking would be encouraged if charges introduced.
32	You should remember that "all taxation is theft", and you have a duty to minimise the tax you levy. That means minimising the council's activities, particularly when those activities are futile, such as responding to a non-existent "climate emergency".
33	I attended the budget consultation event held yesterday, 5th November, in Tetbury. I was very disappointed at the lack of interest shown in my concerns. I was told to contact the "comms team" to express my concerns - hence this email. I said yesterday I had two issues: 1. Lack of parking in Tetbury. Even at this time of the year, people are driving round and round Tetbury during the day trying to find car parking spaces. This is wasting a lot of fuel and causing traffic congestion. More parking must be found as a matter of urgency. 2. Given that CDC have now stated they are looking to recreate a route between Cirencester and Kemble, I would renew the call to extend the Tetbury train from the Trouble House to Kemble. This is in line with Tetbury's Neighbourhood Plan and our climate change actions to extend walking and cycling routes around the town. Please can you draw these observations to those dealing with the budget consultation.
34	Deal with the local issues. in Stow on the Wold these are - Anti social behaviour. - Dog fouling. - Men urinating in public, on my property.
35	But the council must then ensure full enforcement on the roads around since people who do not want to pay will park anywhere they can. A bit like people fly tipping!
36	CDC should continue to fund Cotswold Counselling - given the local mortality during Covid, Counselling services are almost certainly more in demand for families of bereaved people. In fact, the funding for Cotswold Counselling should be increased given these continuing circumstances.
37	It would be good to have more car parks, in light of the amount of new homes being built. I would prefer to see money spent on road repairs and current infrastructure rather than new statues and loos!
38	I'd like to see more done to improve our visual environment particularly roadsides. There seem to be disused road signs, sign stands, sand bags, porta-loos on every verge in the Cotswolds. Between Northleach roundabout and Cirencester on the A429 there is a porta-loo that's been there 3 months and at least 20 discarded stands, signs (diversion etc) on the grass. I reported one stand and 3 weeks later, it had not been removed - it had been thrown into the hedge and a traffic cone, light and another stand had been put on the same spot to warn of the danger of the abandoned sign stand. Surely it would only take a few extra minutes for Tarmac or whoever is responsible to collect all signs after each job! It's lazy and unsightly.
39	I think that your annual letter relating to the charges should directly mention that due to the reduction in funds from central government local taxes will have to increase. I also think that a more holistic plan for car parking should be worked upon with incentives for those who are essentially parking for work in town and giving some priority to shoppers with car parks nearer the centre, including free after 3. Surely we have the brains to work this out to a more satisfactory solution and one that can dissuade folk from just parking at the most convenient car park. Could we get some students to do a study/survey? Radical thinking is needed for the benefit of visitors/ shoppers who are the life blood of the town and shops. As radical as say the Forum car park not opening until 10am. We really have to work hard on this problem and not just accept the status quo; and for the purposes of the study set aside finances while the study of ideas goes on.
40	Invest on cycle lanes that would help people around Cirencester and reduce the carbon footprint
41	Whilst it's correct to remove free parking, there needs to be an impact assessment on the immediate community who live around the centre of Cirencester. This is more important now due to peoples home/office routines changing and the lack of on street parking for local residents.
42	Reduce staff numbers. Decrease allowances for Councillors. Sell off unused buildings. Increase planning applications costs.
43	Visited the pop up in the market place and was slightly surprised at how little detail there was. The council clearly wants to raise money via council tax and parking to fund their Green mandate, but it's just very vague and the people in the market place, although lovely, couldn't really enlighten me beyond 'we're going to be a progressively Green council'. I am concerned, like many others I speak to, that this heralds the start of the council increasing costs on the residents year after year to fund projects that are still being crystallised. I think you possibly need to look within and ask if you're getting value for money already - surely those new road signs could have waited if you needed additional revenue? Rising council tax and parking at the same time feels an unnecessary burden on many families. Good luck.
44	The budget is quite unclear on what the outcomes will be. A lot seems to be finding investigations, but no specific output

	Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?
45	You should be looking at all opportunities to make staff and processes more efficient and where possible reducing staff numbers as the cost of employing staff increases.
46	You want people to come to ciren well paint the tumbleweed bright colours to give them something to see the town is dead the market place is a £1M+ eyesore pay cars and occupants to come here. Not a fortune to park
47	So the plan is to increase council tax and borrow money? Get the planning department working efficiently, rather than allowing them to stall and waste time, preventing the construction industry from getting back up to speed and people investing in the district. Here's a tip. Your pre-application enquiry fees are extortionate (especially for the quality of advice received) and a barrier to getting the system to work. If the pre-app costs more than an application, then people just submit applications. Other councils charge £65, £100, £120 etc for pre-apps. Cotswold charges £600+ to misunderstand your proposal and recommend you either go away or submit a real application. Make the pre-app £100 and you will get thousands of paid enquiries on all manner of projects. Keep it at £600 and the system will be clogged with unnecessary applications that you get £206 for, and grind to a halt.
48	I would like to see a residents parking scheme throughout Bourton on the Water and waiting restricted to 30 minutes in all central areas of the village where parking is currently free. This will allow locals to use the shops, residents to be able to park, with visitors all paying to visit with their vehicle; their parking fees should contribute towards the upkeep of the village central areas.
49	Without more detail on your plans it is difficult to make informed inputs to the consultation. For example in relation to question 2, has this been done before, what leads you to believe it is a credible way forward - have individuals/ companies agreed to participate? The information in the brochure sent in the post and on your website, is also rather opaque lacking sufficient detail to know what is being proposed.
50	I think you don't need to spend £750,000 on consultation, etc on the 'Climate emergency'. Just do the things you've already identified - more charging points (which actually work all the time), more energy efficiency in offices
51	Remove charges for installing EV points in listed properties
52	Free parking encourages shoppers - shopping in town is badly needed to prevent high street shops folding. I would recommend spending a higher proportion of the budget on cleanliness - removing litter, providing clean toilet facilities etc to attract visitors. I
53	Free parking on after 3pm and on Sunday plus reduction in prices
54	Virtually the entire budget is being spent on "climate change"...not just the £750k specifically allocated, but £100k on green transport, 30k to engage with communities on climate change etc etc. This seems vastly disproportionate when the genuine impact on the climate we can make is minimal. I strongly object to my council tax being spent on this almost cult project, when issues such as our destruction of nature and the eco system is significantly more damaging and manageable.
55	It's alright for you lot, I work in tesco evening shifts and have to drive 6 nights a week so will cost me an extra tenner a week to park now, a tenner that rather give my kids have you lot any idea how normal people live? you'll say in the paper it won't make any difference but it will. How many of you walk to work down trinity road or use there free spaces?
56	I think that the focus on the climate emergency is absolutely the right approach. As for car parking, we need to incentivise people to use buses and improve bus provision to reduce those short journeys.
57	Free parking in Moreton in Marsh High Street should be stopped, to discourage all longterm parked cars.
58	you need to adjust your ambitions - let's face it, some of this extra money you're looking to raise is going to be spent on things we do not need - like new road signs!!! Our local playground is falling apart - but you've given us a nice new shiny sign on the road leading up to it. It's crazy. Good photo opportunities for you lot, but I complete waste of our hard earned money.
59	Reduce the charge for the Green Bins for garden waste.
60	Encourage the use of green bins for garden waste by reducing the cost rather than increasing the price and discouraging the number of green bins being used.
61	Not quite sure on the ramifications of Q2 which is why I have ticked Don't know! Would need to know more about it.
62	You can't keep hammering parking every year. Green policy I agree with, but it's very vague with no real detail. Some people are struggling for money - increasing parking hits the lowly paid disproportionately. Many Cirencester based council members can walk to work - many can't and need to pay to park. Trim the fat first - did we need all these new road signs? How on earth were they a post-covid priority if you're now planning to raise more taxes? Did we really need the thousands of newsletters you've just sent out? Waterloo car park scheme? How much money was wasted for something at odds with your green policy which will never see the light of day? The spending of this council seems all over the place - with the only certainty that you'll be asking for more money each year.

63	Please invest in public transport, cycle lanes and car share schemes. These will achieve greater emission cuts than electric vehicles. We strongly support the use of nuclear power as a low emission power source.
64	The proposal to spend nearly one third of the budget " towards addressing climate change" is part of the current vanity policies which are totally irrelevant to the needs of residents
65	Free parking over night is a must for those who live in town,as it's highly unfair for them having to pay high council tax rates, and then have to pay for parking over night
66	I believe the car parks should be free whilst public transport remains so poor. Otherwise you will reduce the accessibility of high street shops which are already less convenient than online shopping. This could lead to less money spent in local businesses and therefore fewer local businesses paying rates. I believe the proposed plan is short-sighted and not strategic enough.
67	Wasting money on Climate change is scandalous. No district council can have any meaningful impact on climate change whatsoever
68	Stop trying to screw more money out of motorists who come into town to support local businesses . And don't waste our money on nonsense like the climate emergency.
69	I am dismayed and appalled to see that your approach to homelessness and helping those with complex needs and who require support is the area you are allocating the least amount of funding to, even the fight against fly tipping appears to be more of a priority to you. I will not be voting for Liberal Democrats in any future election. You do not reflect my priorities.
70	Please invest in decent safe cycle paths within Cirencester and also to connect to Kemble and watermark. Healthier and greener than electric cars
71	I enjoy free parking after 3, and time my visits accordingly, but understand the potential loss of revenue. However free parking is attractive partly because not all car parks will take cards. I also wonder if the calculations of revenue loss are based on the current use of the carparks, which is increased due to them being free.

	ANNEX B
	Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?
72	I think investment in addressing climate change and engagement with communities in relation to the climate change emergency declaration should be scaled down to allow greater investment in helping individuals with complex needs to avoid homelessness. The proposed investment of £23,000 between 2020 and 2023 is not nearly enough in my view. There are still homeless people living rough on the streets of Cirencester.
73	Make your Listed Building Officers more friendly, helpful and engaging. Help owners of listed properties with good, constructive advice and knowledge. Too many are unqualified for the job.
74	In the October 2021 Cotswold News, there is a section outlining investment priorities for 2020-2023. I note that the second largest item of spend is £740k to 'review the local plan'. This seems like a huge amount of money in comparison to that which is allocated to other important items like the £23k allocated for helping individuals with complex needs. I do hope that this figure is not made up of consultancy fees. It would be very good to have a basic breakdown of each item on the investment priority list.
75	Ref Q1. I am not in favour of making the tackling of climate change the highest priority in the council's plans or budget. It is important but the local cost to global benefit ratio is way too high to be justified. If the mitigating actions are locally economically sound then they deserve their priority status, for example insulating properties, otherwise they are in danger of just being more 'greenwash'.
76	Scrap bin collection. Seven separate bins in ludicrous. Replace with strategical positioned bins where residents can put their rubbish on a daily basis. In high density parking areas limit parking to two hours and introduce paid resident parking permits. Stop all housing development unless the housing is eco friendly i e ground/air source heating, solar/wind power, hydroelectric power. A radical rethink is required and the council must stop tinkering around the edges.
77	Maximise car parking income by installing car chargers - they don't need to be super fast so no massive electricity upgrades required - and charge for electricity as well as parking. This will also encourage residents without off road charging to shift to EVs and help commuters who park in town during the working day to drive electric. This model is ideally suited to community funding.

78	I am very unhappy with the Council providing financial support, food vouchers, etc to families. I do not agree that Council Tax should be used in this way. I am struggling to pay the Council Tax. I'm sure I have less money than a lot of people claiming every benefit in the book.
79	Please consider that council taxes increase along with other serious increases in energy prices , people's wages are not
80	We need a bus Lechlade to Swindon and Carterton. Please bring back no 64. Need bus to hospital both Cirencester and Swindon.
81	The broken edges of the road surfaces at the edges of the lanes are a disgrace as they are so dangerous for drivers cyclists and pedestrians. Perhaps some money spent on their repair would not go amiss. Also stop parking in passing places on the narrow lanes and fine the perpetrators. This would be a nice little earner for CDC and prevent traffic jams as well as reducing pollution in the villages when the jams occur
82	Too much spent on consultancy advice. Why don't senior manager with responsibility in these areas not make more of their own input. How about seeking ideas from other councils?
83	Why should I subsidise others when they can afford to pay more? I already pay £320 PM in Council tax. As a pensioner this is more than I can afford and has meant cuts elsewhere.
84	Keep it simple
85	The parking charges should still be free after 6pm My preference would be to add in some free parking on Sundays, say up to 1pm to allow those who wish to go to a church, or other religious service to benefit for free parking. A lot depends on the on-street parking restrictions. If they only operate Monday to Saturday that would not be an issue, I can, however see that exempting Sundays up to 1pm, may require a review of any residents parking that may exist. Whilst I said no to the idea of lending to the Council at a rate, that more reflects a personal view on lending. If others did want to do that at a commercial rate, and with no risk, I would not object, as I can see the logic behind the idea.
86	Stop making residents on band D pay more and more each year. Since I have lived in my home (4 years) our council tax has increased by over £10 a month.
87	I have answered not positively to the above questions because I am tired of Tetbury having no leisure facilities and would like this addressed
88	Stop wasting money on "Green" initiatives until someone comes up with a plan to stop the melt phase of THIS CURRENT Ice Age !!!
89	More routine patrols in parks, especially afternoon and evenings with teens. They can often be very aggressive places to play and take children.
90	With regards to investing directly into initiatives - that's great providing the rate of interest is not absurd like the initial solar schemes. Other priorities..? Don't waste tax payers money on COVID restrictions or sanctions. Don't be a sheep - business needs support, not restrictions. Don't use COVID as an excuse.
91	Ineffective pot hole maintenance. We need more effective ways to prevent very dangerous high speed driving in villages like South Cerney.
92	I think there should be more focus on reducing the cost of services provided by the council, and I don't mean just re-tendering and going with the lowest bidder. The council should be leading the way on efficiency, and I don't feel that they are doing that at all.....
93	I think rather than introducing a tariff there's one charge on a Sunday for instance your 20 mins free parking, then £2 up to two hours and £4 for anything over. or if that's too complicated £3 after 20 mins with free parking at the rugby club and leisure centre
94	A critical look at overheads is needed. There should be no more than a manager and a clerk in any department all other staff should be frontline with limited management responsibility in some cases e.g. foremen or team leaders
95	Please balance the goal of sustainability with value for money. Not green at any price?
96	Yes we do not need the 2 man team of leaf blowers that come every week to Bourton on the water during the summer when there are no leaves ,all they do is create dust everywhere a total and utter waste of money

	Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?
97	Re 1 above - before building anymore houses for rent (or for sale) the council must sort out the infrastructure issues (schools, dentists, doctors, sewers, drainage, roads etc etc) Re 2 - not the council's business - stay out of it and just encourage private sector to do the investment by being more friendly to business. My own companies are located in Worcestershire (not the Cotswolds) despite my living in Moreton in Marsh as frankly the town, district and county councils made no effort to assist me when I set up. I now employ c 60 people many of whom are low skilled and were previously unemployed and contribute c£3m to the local economy in Worcestershire (and growing at 30% per annum) - it could have been for Moreton, the Cotswolds and Gloucestershire. Re 3 - just don't spend it on more people. If the council were the private sector it would have c75% of the staff it currently has. To many folk on the gravy train! Re 4 - It is an absolute disgrace that Moreton Town, Cotswold District and Gloucester County Councils have not sorted the parking in the Cotswolds (and particularly Moreton ) out. Don't mess about with chicken feed charges until there is a sensible plan implemented to stop free parking on the High Street and surrounding roads, a proper car park provision is made (golden opportunity missed on the Glebe Land to develop the answer at no cost to the town or council) and we forget the idea that 100 new bicycle racks will be filled with folk who want to visit the town by bike (presuming they haven't killed themselves by traffic rushing illegally along Fosseway or having driven down a pothole (worse by the day)). This is a classic example of fiddling whilst Rome burns. You should also mount a concerted campaign to abolish the Town Council which is a completely ineffective thorn in everyone's side, which achieves nothing and cost money you might just be able to use more sensibly at a district level.
98	keeping the after 3 pm free car parking encourages and brings shoppers into the town which brings revenue to local businesses etc
99	you need to improve garden waste collection after reducing it and charging more. Go back to a weekly collection and in so doing help the environment by reducing the number of citizens driving to the recycling, burning waste or fly tipping it.
100	1- It is completely wrong to borrow huge sums to 'invest' with margins so fine that any wobble in the economy would saddle the tax payer with expensive debt for a generation. 2- no effort has been made to reinstate a leisure centre in Tetbury despite a huge expansion of properties in the town - this must be rectified if you are serious about health and wellbeing 3- increases in parking fees are a direct deterrent to visitors in already struggling town centres
101	Installation of more paid charging points in car parks. Making the centre of Cirencester traffic free.
102	When will electric car charging become a revenue stream?
103	Free shoppers parking should be available in all town and city car parks as charges have been identified as one reason for shopping online. We need to encourage foot fall in our towns and shops.
104	There are lots of chelsea tractor parents collecting kids from school benefitting from the 3 after 3pm parking. get them to pay and make up for this. Evenings should be free to encourage people to travel in and use restaurants etc from around and outside of areas PLUS these carparks provide some extra overnight parking for those roads close by where there is not enough parking space.
105	Council Tax is already far too high. At the moment it costs very nearly as much as our monthly food budget, which is obscene. There is much talk of improvement to green infrastructure, but no delivery. I fully support any budget cuts to this local government. The delivery of services does not represent value for money for hard working people who are already paying for food, gas, electric and water. Please STOP asking for additional funds and get on managing with the huge revenue you already extract from people with an outdated and unfair tax.
106	The so-called 'climate emergency' is an absolute nonsense. It's bad enough that over 25% of our energy bills are subsidising unreliable 'renewable' energy sources, but for the council to also waste what little money it claims to have on this madness just rubs salt in an open wound. Stick to the core responsibilities of the council, i.e., emptying the bins etc. There is no 'climate emergency'! A new review of weather and climate data based on observational data from 2020 finds little evidence to support the idea of a "climate emergency". <a href="https://www.thegwpf.org/content/uploads/2021/05/State-of-the-Climate-2020.pdf">https://www.thegwpf.org/content/uploads/2021/05/State-of-the-Climate-2020.pdf</a>
107	I don't think disabled parking should be free just supply the spaces disabled should pay like everyone else
108	It's important that you don't overcharge so that people will still come to shop in town centres
109	Re car parking, perhaps make free on specific events, keep free after 6pm as a change there will hit restaurants further, while I've enjoyed free after 3 it has to be affordable, maybe bring it back when possible
110	Garden waste collections weekly during summer and autumn please.
111	Don't waste money on green 'climate' initiatives. We are being impoverished by central government as it is.
112	A survey that is asking questions set like this is a biased survey and reflects the view of the council not the people it is supposed to represent

113	You need to tackle street parking in bridge road Residents can't park in their own street
114	Stop spending ridiculous money on stupid street signs and fix the bloody roads. Stop with all the fancy photos and adverts which would save you more than enough money to keep raising the council tax that goes into your wallets. Take pay cuts so you know what it's like being a real human.
115	Turn off all street lighting to save energy and money. Collect all compostable waste , including food waste, in one bin. Plus collect all other waste and recycling in one bin and sort at recycling centre to achieve 100% in the Cotswolds
116	prioritise keeping employers in Cirencester and other towns, from small offices to large employers so it is not just tourists in the town centres. make it a place that has a variety of people and services. maybe offer permits for parking again or more long term parking not just a few hours at a time.
117	I would like to see you are actually spending the money you receiving through the council tax but I'm failing to see any roads or pavements being fixed yet every year you are increasing everything but where the money goes noone knows. Even the recycling bins are often just half emptied so I really strongly disagree of anymore increases of tax. Learn how to manage better with what you are receiving. Start with yourself and cut some money out of your salaries.
118	There does appear, especially this year, a large number of NEW staff positions being made at CDC mainly in management (not in Customer Service, Planning or any of the other departments, seemingly to aid the Leader and cabinet officials) under the Liberal Democrat's obviously increasing your proposed budget. Is this really necessary?
119	This survey is meaningless. Asking the questions, alongside providing a draft budget, would have been more useful. How can residents comment on setting a budget without understanding the impact their answers will have overall?

	ANNEX B
	Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?
120	We have very poor services in this area and personally I cannot support further increases. There are few swimming pools or other sports near me (Avening/Tetbury), the garden waste scheme increased heavily in price and went fortnightly. I fail to see where my £100 per week goes.
121	Do more to prevent gypsies setting up camp
122	If you increase parking charges it will discourage visitors to the town therefore you deprive the local shops of trade. Not a very well thought out decision.
123	Please don't get rid of the free after 3pm parking as it brings people into Cirencester to the shops and cafes
124	Why not generate revenue by cutting the grossly overinflated salaries of council staff? Your chief executive does NOT need a £100k salary (no-one does) rather than continuing to "stealth tax" the residents of the district through increased car parking. Also there was no option on question 4 for "I would like to see all parking charges removed" which I would choose - you are sabotaging local business by charging people to park.
125	Utility bills and other household expenses are all going up at the moment. Now is not a good time to heap on more costs.
126	I think the CDC should look at investing in the House of Fraser building and generating income from it. For example, the top floors could be used for affordable rented flats for local people to help with the housing shortage. The ground floor could be used for pop up shops of various kinds and a coffee shop where profits all go back to CDC to help generate income to help with reduction of government grants. This would also add to the civic pride initiative and fill a gaping hole in the town centre.
127	I feel that you have not done as much during 2021/2022 as in previous years and therefore any extra charges seem to be unjustified. I have evidence of where things in previous years have been well maintained throughout the district and have been left even after reporting during this financial year.
128	Charging for parking won't fill holes in finances. Businesses need customers and charging for parking puts people off and drives them out of town. Q2: Councils investing in emerging schemes almost never works. Allow private money to take the risk by enabling schemes via granting planning for them. Hang in there - at some point we will have a new government that will realise we can't cut central funding in the way that it was.

129	If you put parking up you are pushing people away and you need to sort out beeches car parking - the card option does work a lot of the time and there are so many parking apps across the country it's ridiculous. Businesses need footfall and putting up charges won't do this. People will go elsewhere. You are supposed to help small businesses and keep our town alive in the high trees
130	400,000 investment in feasibility studies of renewables is far too much as the research has been done there are pilot schemes that have been completed and will have almost 12 months data on already, these could easily be replicated in the local area.
131	Pleased to see budget assigned to climate change
132	The CDC seems to have fixation about the Climate Emergency. It is important, very important. However, given all the other issues facing the Council, should it really be the top priority?
133	All villages and town centres should have 20mph restrictions. This could save lives and injuries, and will help to clean the environment and consequently the problems with climate change.
134	Stop wasting money on projects that are not needed. Think about the Cotswold District not just Cirencester..
135	Parking should be free everywhere it encourages growth
136	No free parking, at a low cost, unless disabled
137	You could easily raise money by putting speeding cameras in local villages. There must be a way to do this; you just need to think creatively.
138	If Society is being encouraged to recycle green waste why do residents have to pay for the service. Many with gardens continue to have bonfires which totally defeats the "green initiative" and causes other issues ie; - smoke
139	Review Green bin collection during summer and reintroduce and option of one collection per week for an additional charge.
140	The green bin service needs attention. Parking, leave as is now and save on parking attendants wages. Council tax could be increased a small amount
141	Spending on waste/recycling. This needs rethinking as in particular 2 weekly garden waste removal isn't working well during growing season
142	Stop spending money on Road signs and only replace when required not just because we have a new logo. Slow the branding changes down, as this costs money which could be put into services. I believe a review of what has been spent by the current political party in power since taking office is required. How about we look at getting some open spaces back up and running for our Children, Moreton in Marsh has 2 parks that are now closed and there is no money to upgrade or resolve the health and safety issues they have since they were closed due to Covid. However, we can spend money on carpets just because we didn't like the colour.
143	If money is so tight that you need to increase council tax, *** ** decided it'd be a good idea to spend money redesigning the Cotswold District Council logo and branding in the height of a pandemic? I wonder how much that cost the council... Joe ***** Harris massaging his ego again no doubt. ***** .
144	Many in rural areas have to use their cars because of poor public transport links This is bad for the environment I would like improvements and electric buses to be encouraged by district and County council
145	I think the council could be more creative with empty properties it owns. Maybe create CICs to provide services such as youth provision, incubator offices, curated local produce etc. Squeezing parking is what Tories did before to raise money.
146	please do something about the potholes in our roads. They are disgraceful and an embarrassment to our Cotswold area.
147	Yes. Regarding the garden waste collections. I think it would be better to have weekly collections during the summer months ie May-October then monthly November to April. This twice monthly is quite honestly ridiculous in the growing season. During the winter months not a lot is done in the gardens. Please would you consider this? I have spoken to a lot of friends and neighbours and they think the same.
148	Very excited about the plans for a community investment scheme and strongly support the Council's budget allocation to climate change initiatives. Think the priorities are in the right order and have considered many of the key issues in the district. Particularly keen to see the development of safe cycle routes and any action CDC can take to encourage the county council to invest in public transport and frequent buses would be appreciated. I also support the Council doing face-to-face visits around the district to consult on the budget as I think more active engagement with the community in as many different ways as possible is really important moving forwards.
149	Businesses need people sort out the car park situation in beeches car park as it doesn't work very well always car machine out of service. We need visitors - too many apps for our phones for parking. Need to use money again,!!!!

150	Better public transport between Tetbury and Cirencester. The bus service is awful - not enough buses
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	ANNEX B
	Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?
151	You stress the shortfall in your funding, I would like you to consider the shortfall people are seeing in their personal/family budgets. If people are struggling cycle lanes and CDC embellished street signs are not a priority. CDC are not seen as being responsible spenders.
152	The council needs to work with Gloucestershire Council and others where appropriate to make cycling into Cirencester from the surrounding villages easier and more user friendly. This could include reducing speed limits on lanes, creating cycle paths etc.
153	Re question 4: Important to note that charging for overnight parking will put extreme pressure on residential roads, especially those who use the Forum car park - so I strongly recommend keeping overnight parking free.
154	Stop send repeated electoral roll letters. Do it online.
155	Yes - more parking needed in Tetbury which can be charged for which would increase revenues. Suggest land around the fire station (and, if possible, move the fire station and make all that area parking).
156	I would like to see a recognition of the valid and valued place of wildlife in our area. I would like to see far more environmental considerations, these measures often mean savings. Many councils have stopped regular mowing of grass verges and roundabouts and other council managed areas, they have also stopped the widespread use of glyphosate weed killers, both actions provide the highly valued wild flowers, pollinators and general wildlife, especially insects with much needed habitat, whilst costing the council less. We are also losing many of our birds including our summer visitors like swifts, house martins and swallows, I would like to see planning taking into account the place these fantastic birds have in our built environment with the promotion of nesting sites, swift bricks, boxes in new builds and renovations and general protection of existing nest sites to these site specific birds. Local environmental protection actions make a huge difference to the well being of people as well as the wildlife, lockdown taught many more of us how important it is to have an environmentally diverse landscape to live in or escape to. The idea of everything being 'tidy' and controlled is now looking very old fashioned, the new way forward is rewilding and recognising that we humans are only part of the environment, we forget this at our peril. Mental health is hugely affected by the environment, seemingly small adjustments to spending in that field can have savings in other areas like social care. Whose mood is not lifted by seeing a wildflower meadow or the first swift or swallow of the season?
157	Free parking in CDC like in West Oxfordshire. No questions on here about waste and other services which have a significant impact on budget. Very poor and vague survey.
158	Tax the people who earn the most. The middle earners always lose. We earn just a little too much to claim benefits and not enough to be comfortable living. There is never support for the working class on minimum wage. We would be better off on benefits, there needs to be incentives for people to work. People on benefits should have to pay council tax too.
159	It appears that the Council has ample funds! According to your website, the Council is offering "support with buying food, helping some of our local families most in need". I do not agree with my Council Tax being used in this way. You are not a charity. Stop wasting money
160	I would like to see the current council revert back to smarter, efficient ways of shared working arrangements that made savings on the running of the council, rather than just raising the rates and costs of services to cover costs. All this current office have done is spend money, raise rates and cut/exclude services. I don't understand why Publica (an authority set up by four councils to oversee the running of all councils) has its own CEO, and then CDC has a leader of the council and also a stand alone CEO - I mean how many chiefs do you need to run a public authority - when one CEO used to run two councils?! If you are going to offer a non statutory service (ie Green Waste) make sure the service is accessible/available to all residents, not making policy decisions that potentially exclude certain residents from being able to use the service. I tried to get garden waste bags as I have small garden, and was made to jump through hoops to access/buy these - as I don't have the space to house a wheelie bin. Frail residents also need bags as they can't manoeuvre wheelie bins. If you can't continue to offer bags and bins as a choice (like you always have done so) - remove the service completely. Its unfair to only provide a service to wheelie bin users only, not everyone in the Cotswolds have grand gardens nor have family/friends that can put their bins out for them!
161	Serious Consideration needs to be given to whether spending on vanity projects should continue at this time - they are nice to have and not necessities. Asking communities to invest in projects is completely inappropriate and unnecessary. No further pay rises to councillors - optics of this look very poor.
162	I've always thought the parking charges in this area are ridiculously cheap compared to other places- others obviously think this too else they wouldn't be so full! Would like to see more innovation around car parks in general and move away from being so reliant on them for revenue.
163	Raising council tax for vanity projects and pay rises to councillors is unacceptable. It is the job of central government to legislate and fund renewable energy schemes. Not local councils which are there to provide essential services to the residents of the district.

164	I do not agree with any of the parking options presented but had to choose one option. All parking should be free in the district
165	Expensive parking deters people from coming into Cirencester and spending in shops and F and B. Do you want a town left with only charity shops?
166	If want to increase council tax even more we want to see an improved service, which we dont, we are sick of seeing our money wasted on woke and immigration, start by cutting your own wages and bonuses
167	please prioritise social care
168	Affordable homes for young locals and key workers. SAFE walking for pedestrians - including provision of pavements and footpaths - especially between residential areas and key locations such as schools, hospitals, churches - most village roads were made by foot travellers and carts they were not built for cars - especially two cars travelling at speed in opposite directions on roads where there is no safe refuge for pedestrians (or horses) as the edge is often a field wall or ditch. Ensure there are SAFE routes for children to walk to school to avoid parents tearing into, through and out of villages. Review public footpaths to ensure they link up providing safe access through and between villages even if it means purchasing narrow strips of land on field edges to facilitate this. A car approaching on a blind bend whether its doing 20 or 30 is still going to hit a pedestrian who has nowhere to go. Holiday rentals provide income and employment for local people - empty second homes do not and exacerbate affordable housing crisis. Pembrokeshire and Cornwall have brought in measures to dissuade second home ownership. We are a rural, agricultural area that benefits from tourism - the structure will collapse if the people you rely on to work in that economy - catering staff, field hands etc - can't afford to live here. It is hard physical and often thankless work which is poorly paid. Who is going to volunteer for that if they cannot provide themselves or their families with somewhere to live, run a car or afford public transport (if it exists) to reach the job. Also in relation to the latter a regular circular bus linking Toddington roundabout with Stow, Moreton and Broadway might link and open areas for commuters, shoppers and those needing health services. Finally if you are thinking about alternative energy remember Cotswold mills were mostly water powered, unblocking a few waterways and installing small hydroelectric units would benefit previous mill communities without requiring massive investment or becoming a blot on the landscape. Encourage people to install solar panels if they have a south or west facing roof. Invite community share ownership of your new energy schemes. Invest in each village having a community hub where food essentials supplied by local farms, a cup of coffee, a light snack, citizens advice, access to councillors, health support can be available - somewhere that can be walked to safely to offer an alternative to the car or where no public transport exists. If the Cotswolds can become a more affordable place to live then the council should in theory need to provide less in services.

	ANNEX B
	Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?
169	I would like to see the council being forward thinking and proactive and looking to the example of councils such as Preston to build a positive future for Cirencester
170	I don't agree with cuts to working families on top up benefits, these people are already struggling financially.
171	This administration has wasted a lot of money. From the parking review with the promise of a new multi storey car park in Ciren which the town didn't want (how many hundred thousands spent?!) to new roles including a PA for the Leader of the Council and remodelling him an office at CDC when there were already offices available. I think this is a slap in the face to all tax payers that these Councillors who are playing politics continue to put CDC in a worse position than when they found it. When the day that the stories take back control once the District says enough is enough, I am expecting to read that they have left a note for the incoming administration to say "there's no money left". The Council need to start delivering before they can ask for charges to be increased.
172	To help against climate change please build more cycle lanes. The A435 for example is so dangerous for cyclists. More would use pedal power to get into Cirencester if there was a safe route to get there. There isn't even a complete footpath from Cirencester to Colesbourne making safe walking impossible. This leaves residents no choice but to drive.
173	Please be transparent
174	More investment in planning officer capacity is essential as the service is in gridlock and creating hiatus in recovery and a democratic deficit. Early advice can save planning resource down the line. Charging preapp advice in ALL cases is counter productive, and cost shifts to parish and town councils. Litter on busy road verges needs serious attention. And exercise on prescription needs proper funding by NHS and joint commissioning. Not fair the leisure centre users paying high rates prevents those wanting to reduce their own risk factors. Low income people can't afford local leisure centres.
175	Prioritise the people who actually pay Council Tax and the daily problems affecting lives - particularly the exponential rise in anti social behaviour.
176	It's good to see the Council taking action on climate change and delivering social rented housing. The Clean and Green initiative is a great idea.
177	Reduce your costs and spend some of your reserves and scrap proposed car park

178	I am quite happy to pay a small increase in council tax to protect services. I worry about money being spent on things like street name signs when other things are more important.
179	Look at us residents whom pay for parking permits to park outside our house & if we can't park we have to pay to park in the car parks - it's not right!
180	Current high parking costs have resulted in far fewer visitors for shopping especially when places like Witney offer free parking for shoppers.
181	Raise the planning fees
182	The biggest complaint, overheard and repeated, time and time again is LACK OF PARKING. Do not put extra charges onto the people who are lucky enough, or persistent enough, to find a space. There are enough empty shops in Cirencester as it is, without making the place even less attractive to potential shoppers. Also, have you considered the people who have to leave their cars in the parks because they work in the town? They can't avoid the charges. I know someone who works at Ladbrokes whose first hour of work basically all goes in paying for his parking! Also, I don't know which contractor did your block paving in the centre of town but the standard is diabolical. blocks uneven and presenting a trip hazard, or completely missing and replaced with some collapsing temporary tarmac. When it rains, there are puddles everywhere which proves it's been incorrectly laid and the drain-off is not up to scratch. Cricklade Street is another disaster and needs surveying in order to note and action the poor surfaces on both pavement and roadway.
183	speed up roll out of electric charging infrastructure. I would like to see more green environments in urban areas of towns and villages - bio-diverse buildings. Look into Biophilic design. There are some interesting innovations in climate control technologies that the council should consider - low cost high impact design - Airlite paint helps to reduce air pollution - we should commission artwork and murals on buildings using this paint to liven up buildings in the cotswolds similar to Cheltenham artwork campaigns that will also have a benefit to addressing climate change
184	Stop charging £600 a year for parking permits without reserving places for permit holders. People in my road park illegally as getting a parking fine once a month is cheaper and more convenient
185	What is happening with the green bin license fee, is this increasing again? I hope not!
186	I would like to see a park and ride system from outside town to reduce the workers cars filling the town. They could then charge shoppers and visitors a fee to raise money.
187	Instead of taxing squeezed people more, campaign to receive higher than the 7% you currently only get. Why is that? Fix that instead of raising tax.
188	Concentrate on delivery key services and less on climate related activities.
189	I don't agree with using staff costs as the reason for unavoidable budget increases. Inflation should be baked into your forward plans already and a responsible organisation recognises the value of its staff. Without them the council cannot deliver anything.
190	Green Issues. The Cotswolds has a very large number of listed homes. As a rule you do not allow these homes to be double glazed. Allowing these homes to be double glazed would save a lot of greenhouse emissions at no cost to the council. In fact air/ground heat pumps don't work without high levels of insulation and make lots of noise.
191	O think central government should provide more
192	Yes, what's the point of these surveys as you do it anyway
193	The climate emergency measures need to come last with whatever is left
194	Changing the car parking fees sounds like a tax on the users for the subsidy of other areas. In addition this will not support the recovery of local business.
195	Car parking charges are too high! It's done nothing but help to kill the trade in the town

	Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?
196	There is no local entertainment for young people. Where's the bowling? The cinema? Somewhere to go have fun? Young people are isolated, which is pushing them to find the fun in drugs. If there was more to do, less people would be inclined to take drugs long term. Also, the bus services need to be more frequent to places like Stroud, Kemble, Fairford etc because people who don't work are isolated to Cirencester, or an hours bus to Swindon / Cheltenham. They have a lot of warehouse work on the business park which is impossible to get too for an early start.
197	I wouldn't be totally opposed to the council tax proposals, even though increases are not ideal. However, I believe provision should be made for single occupant properties (like myself) who will end up shouldering a bigger increase than a household who might have more than one income. Perhaps some thought could be given to excluding those who are on the single occupant discount, and giving much bigger properties more of the burden. Whilst I do accept that the increase is small when costed over a year, it is a lot for a single occupant like myself. In regards, to the climate bond scheme, I think that would be a great idea. Maybe local residents would be able to have first access to it if possible. I will certainly consider investing in it, as long as the fees are low. Finally, the car parking which is free after 3 is very popular and I would keep that. However, I would perhaps charge for overnight parking if it is deemed that Sundays need to be kept free of charge.
198	I would like to know how the decisions on spending council money is monitored and evaluated.
199	Reduce costs by cutting office and high ranking staff numbers also sell off the council building at Cirencester.
200	Leisure services should also be prioritised. It is incredible that there is no local leisure centre provision in Fairford.
201	Reduce parking costs dramatically then force the use of car parks by removing the ability to park on the road. Even issue residents permits !! I would gladly pay £10 per year per permit if it means the roads are no longer blocked by parked cars ect
202	West Oxfordshire District do not charge for parking and they are partnered with Cotswold District Council. Would free parking and a small increase in council tax not make more sense especially in a tourist area and to help boost the economy.
203	Putting prices up force workers to park in residential streets around the town. So obvious it will happen.
204	Parking should be free at all times to promote people coming to the local shops Also the free after 3 does not help the market as it closes and the parents are using the car parks to pick up children from school
205	Maybe the nationally agreed pay scheme should be reviewed (at a national level). I doubt many will be getting pay rises outside the council (I work in another council and would give up my increment. I'm not greedy)
206	Car parking costs should remain as they are. They are ridiculously high compared to other towns. Paying £7.50 for all day to go to work is crazy and unaffordable. As it is I don't bother to shop in Cirencester anymore unless it is the out of town shops and I have lived here all my life.
207	Take a wage cut.
208	council put the parking up last year already to balance the books, you shouldn't have to put parking charges up every year. joe harris always used to moan they were too expensive, and he puts them up anyway. double standards. lost my vote.
209	The council needs to better prioritise its spending plans towards services which are absolutely essential, whilst keeping any tax increase at or below national inflation rates
210	Increasing parking charges may well have a detrimental effect on the viability of Cirencester's businesses, people will be put off paying more and move to places where parking is free!
211	If you need to raise revenue, stop wasting it on things like new road signs!
212	I strongly object to the CDC raising millions for speculative development & investment. These long term loans will be vulnerable to rises in interest and could well end up costing the Council Tax payer rather than subsidising.
213	You've already put council tax up last year - surely you have enough to do everything stated in this survey already!

214	Personally I'm astounded you are thinking of putting this up bearing in mind national insurance will be increasing and energy bills increasing. This council are greedy and needs to realise you are hurting the pockets of many by increasing. Not to mention the local council will increase their rate, police will increase their rates. You've lost a voter next time round I'm afraid. Well done Mr Harris you've killed confidence in your council and party
215	You cannot keep using parking as a cash cow and raising charges every single year to fund your various ventures.
216	Stop overpaying councillors and Senior Officials
217	If parking was a bit cheaper I wouldn't mind removing "free after 3". I see cars with 2 hour tickets issued 4 hours ago so assume that there are business workers using the Forum all day with no penalty while shoppers cannot find spaces. The rugby club whiteway car park setup is a nightmare already causing angry drivers where once it was very polite when giving way. I have no faith in CDC getting it right no matter how much money they have from charges. Every change makes travel from rural areas worse thereby worsening climate change effects. Putting a big office in the centre adding hundreds of commuters has ruined access for everyone else.
218	Stop spending and save money. You don't have your own money only mine and everyone else's money.
219	Cut management staff for a start - do a review internally rather than go straight to changing external services
220	More funding needs to be given to improving the public rights of way across the region. Currently you are failing to meet your basic legal requirements but you should be aiming to have a first class network that encourages tourists into the area raising money and at the same time encourages locals to get outside and get healthy lowering spending on public health. Having just one ranger for the county is not currently acceptable for example of something that you need to fix ASAP.
221	However local residents should have permits that allow them to park for free at all times - it's the visitors and tourists that should foot the bill

	ANNEX B
	Are there any comments you would like to make on our priorities or any other aspect of the Council's spending and service delivery?
222	Employ better financial management to control spending and staffing levels.
223	I think you are doing a reasonably good job in difficult times. You should avoid being too dogmatic
224	I would like access to view the complete budget to include all costs of CDC staff, staff numbers etc.
225	It seems a gross extravagance for the Council to talk about financial probity when, from the proposals given, it is asking for residents to fund projects far more ostentatious than utility demands. £25,000 for a new public space seems an odd priority as we emerge from the pandemic. Similarly, although I cannot comment on anything in much detail, the astonishingly large climate change budget reeks of a very expensive green-wash. Indeed, the comparatively low fly-tipping budget surely brings all the Council's messianic green credentials to naught. Furthermore, to fund these follies by extending car parking charges in our market towns, and increasing the astronomical costs of garden waste further, reeks of an economy designed for the benefit of Cirencester locals at the expense of others.
226	Town centres are becoming ghost areas. If you increase car parking charges even more, you risk making the death knell even louder.
227	Better toilet facilities...why don't you renovate Abbey Gardens loos..?
228	Need to reduce wastage. If there is demand for say planning applications the fees should be able to fund more people to service the demand. Same goes for property searches if the demand has increased surely you take more money and can then maintain service levels?
	**** INDICATES THAT TEXT HAS BEEN REMOVED DUE TO THE PROFANITY OF THE LANGUAGE

**Budget Consultation Response - Letter from a Cirencester Resident**

Cotswold Budget Proposals 2020-2023

With regard to the publication referenced above, thank you for your invitation and the opportunity to comment on the proposed budget.

I have assumed that as you have requested input and comments, and in line with FOI, that you will be able to provide more detail on the proposed allocation of funds?

1] £740k towards the local plan. This assumes that as it is for a review, significant expenditure has previously been made? More detail on how much was paid, and to whom, would be appreciated, and again whom to, for the new proposed expenditure.

2] Cycle and walking routes. I recollect that the government has fairly recently made a grant for this, although I am unaware of any sign of this being implemented in and around the town.

3] There appears to be no allocation of funds for car parking in or around the town. The plan appears to identify parking just as a revenue generator, and not providing any additional car parking?

Yours faithfully,

[Redacted signature]

[Redacted line]

[Redacted line]

[Redacted line]

[Redacted line]

## Response from Weston sub Edge Parish Council

### 1. £750k addressing climate change.

It is noted that £750k was allocated in exactly the same way last year but it is unclear what has been delivered to date against that budget except for a staff appointment with some direct responsibility.

WSE PC is supportive of the principle but, as comments on this administration's last two budgets, there is no detail of any deliverables with a time line of when they will be delivered together with the allocation of funds to each initiative.

WSE PC considers it reasonable for council tax payers to have visibility of what the spend is actually on and when deliverables are due. ie what is the council tax payer getting for its money and when.

The only detail provided is:

- *Encouraging residents to switch to electric vehicles by delivering charging points across the District.* Obvious question- how many, where and when at what cost? (Same question as last year)
- *Reviewing use of offices and buildings etc.* Obvious question – When will the review be published and how much will it cost.
- *Identifying opportunities to use our assets to support our climate strategy.* How much is being spent and when will the findings be published?

### 2. £100k to plan and develop greener transport options in the District including cycle and walking routes and innovative bus options.

- In last year's budget there was exactly the same budgetary provision. What was delivered against spend? What are the deliverables, with a time line and associated spend in 2022/23

It is disappointing to find a lack of detail in CDC's budget for the third year in succession.

The above are a repeat of previous year's comments and questions which did not receive definitive responses. It is frustrating to effectively make the same generic comments and raise the same generic questions without adequate response, year after year.

At the Moreton in Marsh Forum event 20 October similar questions from WSE PC remained unanswered.

WSE PC would welcome detailed responses please.

Bill Carruthers  
Chairman WSE Parish Council

Email :

Subject: BUDGET CONSULTATION

Body: Good morning

Please find below comments from Tetbury Town Councillors regarding Cotswold District Councils budget consultation.

Provide evidence what they plan will improve our conditions. Looking online it appears that a 20mph limit has in at least one area led to an increase in accident rates by nearly 150% plus we need to know the effect on use of petrol/diesel at that speed which markedly increases the amount used. No political views needed - just facts to justify what is planned!

In Tetbury, car parking is a very urgent priority; there is little point in trying to encourage tourism etc if visitors have nowhere to park. There is no room at the Goods Shed or Church St and West Street carparks...or the Chipping or the other small ones. If electric charging points detract from current car parking, that will make the situation worse. I'm fully supportive of ECPs, but not if they take up valuable parking spaces...they need to be e.g. using the blocked off spaces on the way to Car Care, opposite Tesco.

It is right that Climate Charge receives a significant proportion of the budget - this area is strong and well managed and will benefit us all.

Why does reviewing the local plan cost so much? I assume this isn't just about reviewing it, but also the cost of the actions to address the local plan.

Fully support the local housing studies...but should this be more?

Supportive of development of better transport options, walking, cycling routes etc.

All the rest OK... but I was surprised there was no mention of funds to tackle flooding, like last Christmas, or perhaps this is GCC or in the climate change budget.

I am not concerned about an increase in parking charges, however this is done, but in Tetbury, there needs to be more parking available!!!

Parking Free after 3pm CDC pray tell how does this encourage tourists or residents to shop in towns , look at Cirencester with the empty shops and banks will be next for Cirencester.

After the loss of the Leisure Centre at £500,000 thru poor management from CDC and SWR Leisure Ltd to only allocate £30,000 is disgraceful.

CDC owe Tetbury a Leisure Centre no hot air!!!!

£400,000 invest in feasibility studies other work providing on social housing.

Social Housings is a business so why are these companies not investing in their business.

CDC needs to focus on here today needs and put these issues into their planning strategy that ALL new developments need to have heat source , Solar panels, Charging points etc.

£200,000 to improve the cleanliness of the district would hopefully continue visitors to the district should help pay for itself.

£35,000 each year to continue the fight against fly tipping is a police matter as it's criminal offence. Don't seem a lot compared to other budgets!!!

£25,000 open space seems minimum spend but it's just a review so is this a paperwork exercise only!

£23,000 helping individuals with complex needs , homelessness to access secure accommodation. Is there not professional out there such as Shelter doing this is a health and well-being matter.

At this current time of austerity Health & Wellbeing should be the priority throughout the District. Not Climate change or Greening

Climate Change THE IN WORD costing the world millions , I accept that we should all be responsible but we can only do so much.

Electric vehicles to build have a bigger carbon footprint than the cars currently on the road.

Do we have enough resources to support the amount of electric needed or will we have to go back to nuclear.

Hydrogen may be the alternative transport for a strategy for CDC !!

Mr Robert Weaver

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Hydrogen may be the alternative transport for a strategy for CDC !!

Just my opinion!!!!

Colin Pearce

**From:** Judith Taylor <judithtaylor@tetbury.gov.uk>  
**Sent:** 10 November 2021 18:20  
**To:** Robert Weaver <Robert.Weaver@cotswold.gov.uk>  
**Cc:** Nikki Ind <nikkiind@tetbury.gov.uk>  
**Subject:** Re: Budget Consultation in Tetbury

Thank you for taking the time to email me; that is appreciated.

I have completed the budget consultation online, but I wanted to stress two particular issues:

1. There is a very serious lack of parking in Tetbury. Even in November, car parks are still full until late in the afternoon and, even then, there are few spaces. Tetbury desperately needs a new carpark for about 80 cars.
2. As I understand CDC are looking to develop a route to Kemble, we want to develop a walking/cycling route from Kemble to Tetbury. Improvements to the Tetbury Trail have been very successful and we should build upon this.

Many thanks.

Judith Taylor Cllr

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# Agenda Item 8



**COTSWOLD**  
DISTRICT COUNCIL

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET – 10 JANUARY 2022</b>
Report Number	<b>AGENDA ITEM 8</b>
Subject	<b>PARISH AND TOWN COUNCIL ELECTION COSTS</b>
Wards affected	ALL
Accountable member	CLlr Mike Evemy, Deputy Leader and Cabinet Member for Finance Email: <a href="mailto:mike.evemy@cotswold.gov.uk">mike.evemy@cotswold.gov.uk</a>
Accountable officer	Robert Weaver, Returning Officer Email: <a href="mailto:robert.weaver@cotswold.gov.uk">robert.weaver@cotswold.gov.uk</a>
Summary/Purpose	<p>This report sets out the proposal to consider the option of recharging the costs of elections to Town and Parish Councils. This would bring Cotswold District Council in line with all other Local Authorities across Gloucestershire and most in the South West, where Town and Parish Councils meet the costs associated with elections in their areas.</p> <p>The proposals are being tabled in light of the significant financial pressures all local authorities, including Cotswold District Council are currently facing, both nationally and locally and the need to best manage those financial pressures.</p> <p>Clearly this means that the Council needs to continue to consider carefully how to manage its finances. Where there is scope to reduce costs, it is sensible and prudent to look to do so.</p> <p>This report was initially tabled for the December meeting of Cabinet. However following concerns from Town and Parish Councils (predominantly around a feeling that there had been insufficient communication with them on the proposal) it was agreed to defer the item until the Cabinet meeting on 10th January 2022.</p> <p>In the intervening period, and as a result of the concerns raised, Town and Parish Councils were invited to attend two virtual conversations with the Leader, Deputy Leader, Chief Executive and Elections Manager. In addition Alison Robinson, Chief Executive of the Gloucestershire Association of Parish and Town councils, (GAPTC) was also present. The purpose of these virtual meetings was to:</p> <p>To listen to the concerns of those attending, and seek to provide answers to questions raised</p>



	<p>To explain the rationale behind the Cabinet paper and intention to charge (from both a national and local finance context)</p> <p>To provide further clarity on how the proposed election fees had been generated, including a step by step run through presented by the Elections Manager.</p> <p>27 members of Town or Parish Councils attended the virtual meetings, including two Ward Councillors.</p> <p>These virtual meetings were very informative. It was clear that there was a strong feeling from those who attended that there should have been more proactive communication about the proposals. It was also apparent that attendees felt more time to allow Town and Parish Councils to prepare and plan for meeting any costs associated with elections would be welcome, ideally as part of a phased financial approach and over a longer time period than originally proposed (from May 2023).</p> <p>The outcome of these conversations and further consideration following the deferral, has resulted in the revised recommendations set out below.</p>
Annexes	<p>Annexe 1 - Indicative costs for Town and Parish Council Elections</p> <p>Annexe 2 - Estimate of recharge costs per Town/Parish Council</p>
Recommendation(s)	<p><i>(a) That the Cabinet agrees to recharge Town and Parish Councils for contested 4-yearly elections at a rate of 50% of their share of the cost in 2023 and 100% of their share in 2027 and thereafter</i></p> <p><i>(b) That the Cabinet agrees to recharge Town and Parish Councils for contested by-elections taking place on or after the dates shown at the rates indicated:</i></p> <p><i>(i) from 01/04/2024 - 50% of the cost</i></p> <p><i>(ii) from 01/04/2025 - 75% of the cost</i></p> <p><i>(iii) from 01/04/2026 - 100% of the cost</i></p>
Corporate priorities	<ul style="list-style-type: none"> <li>● Delivering our services to the highest standards</li> </ul>
Key Decision	NO
Exempt	NO
Consultees/ Consultation	<p>Whilst there is no requirement under Section 35 and 36 of the Representation of the People Act 1983 to formally consult on the proposals set out in this report, Town and Parish council engagement on</p>



	the proposals has taken place since the agreement to defer the item, with a view to better understanding and responding to their concerns.
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## I. BACKGROUND

- 1.1. The Council has a clear policy with regard to setting fees and charges. It expects service charges to reflect as a minimum the cost of providing services. Where services are provided at a fee which is lower than cost, clear policy decisions will be taken. In line with this policy, it is necessary and proportionate for the Council to consider recharging third parties for services they receive from the Council.
- 1.2. As part of the process of managing Council finances, and in light of the preceding paragraph, Section 36(5) of the Representation of the People Act 1983 gives District Councils the discretion to either charge each local Council in full or in part for election costs or bear the costs itself.
- 1.3. The Returning Officer uses a County-wide agreed scale of fees and charges for staffing costs at elections. Cotswold District Council ("the Council") has previously endorsed this scale and agreed to its implementation for all local elections. The Returning Officer is given delegated authority to update the scale in line with the cost of living pay rise each year. In addition, the actual and necessary costs are met by the District Council such as polling station hire, poll cards, postal vote packs, ballot papers.
- 1.4. In 1996, the Council agreed to absorb the cost of all Town and Parish Council Elections except Parish Polls rather than recharging individual Councils for the costs. As such at present reserves are allocated each year to build up a fund for the 4-yearly District and Parish Elections. This fund also covers the cost of any by-elections which take place during the term. If the recommendation were to be agreed, the allocation could be reduced by the appropriate amount.
- 1.5. Parliamentary and Police & Crime Commissioner Elections are funded by Central Government and County Council Elections are funded by the County Council. Neighbourhood Planning Referendum costs are not included in election costs and will continue to be funded by the Neighbourhood Planning Grant provided by the Department for Levelling Up, Housing and Communities.
- 1.6. Where elections are combined, costs are split between the areas and charged back to the relevant Authority/Government.
- 1.7. District and Parish/Town elections take place every 4 years and consist of 32 District Wards (for 34 seats) and 97 separate Parish/Town elections.
- 1.8. In 2019, all the District wards were contested along with 18 Parish/Town councils or wards of councils. Of the remaining Parishes/Towns, 79 were quorate and co-opted the remaining seats and 2 did not have sufficient nominations to be quorate. Further elections were required for these two and resulted in uncontested elections.



- 1.9.** In 2015, there were 17 contested Parish/Town Council elections along with the fully contested District wards.
- 1.10.** When a casual vacancy occurs in a Parish/Town Council, a notice of vacancy is published. This gives electors an opportunity to request an election to fill the vacancy. If no request is received, the Parish/Town council can co-opt to fill the vacancy. If an election is requested it is conducted by the Electoral Services Team and the cost is currently absorbed by the District Council.
- 1.11.** The following table shows the number of casual vacancies since the 2015 full elections:

	Number of notices of vacancy	Elections requested	Co-option
2015 - 2019	165	16 of which 11 were contested	149
2019 - 2021 (as at 14.12.21)	138	15 of which 6 were contested	123

- 1.12.** At present, the full cost of all elections is met by the District Council. The estimated cost across 4 years is £150,000 for the main elections plus approximately £50,000 for contested by-elections at either District and/or Parish/Town level. This is an estimated cost as it is dependent on the number of by-elections taking place during the term.
- 1.13.** Where a Town/Parish by-election takes place on its own, the Town or Parish may choose whether to issue poll cards (s25 The Local Elections (Parish and Communities) Rules 2006, as amended). Whilst the District Council has met the cost of Town and Parish elections, the Returning Officer has automatically issued poll cards as this is seen as best practice. However, should the recommendations be implemented, the Town/Parish Council will be asked whether they wish to issue poll cards.
- 1.14.** Where an election is combined, poll cards are automatically issued and the costs shared between the elections taking place.
- 1.15.** As part of the consideration to recharge Town and Parish Councils, a request for information on election charging was made through the Association of Electoral Administrators to Local Authorities in the South West. The following responses were received, highlighting that Cotswold District Council is unusual in considering charging Town and Parish Councils for their elections.



Authority	4-yearly elections	By-elections	Comments
Cheltenham	Yes	Yes	County scale of fees
Cornwall	Yes	Yes	
Cotswold	No	No	
Forest of Dean	Yes	Yes	There is a threshold for charging based on the precept of the parish
Gloucester	Yes	Yes	
Mid Devon	Yes	Yes	
North Devon	Yes	Yes	
North Somerset	Yes	Yes	20% added to by-election cost for administration
Sedgemoor	Yes	Yes	
Stroud	Yes	Yes	
Tewkesbury	No	Yes	
Torridge	Yes	Yes	

## 2. FINANCIAL IMPLICATIONS

- 2.1 Election costs are calculated according to the scale of fees along with actual costs for poll cards, ballot papers, postal vote packs, venues etc.
- 2.2 The cost therefore varies according to the size of the Parish/Town, the number of electors and whether the election is held on its own or combined with another type of election e.g. Parish and District election on the same day.
- 2.3 As an example, the election held on 7 October 2021 for Stow-on-the-Wold Town Council cost in the region of £4,000 for 1,613 electors.
- 2.4 At combined elections, costs will be split between elections - some costs will be split 50/50 e.g. polling station hire, whilst other costs such as ballot papers will be charged in full to each election type.
- 2.5 At the 2019 elections, the total cost of all District and Parish elections was £125,000. The table below shows the approximate costs for each Parish Council/Ward where there was a contested election along with an estimate of what could have been re-charged to Town/Parish councils if 100% of the re-chargeable costs had been passed on to the Parish/Town councils with contested elections.
- 2.6 These estimates are based on the number of electors, postal votes, polling stations and staff. They also include an amount per elector for printing and stationery.



<b>Parish/Town Council</b>	<b>Number of electors</b>	<b>Full cost of District and Parish election £</b>	<b>Potential recharge cost to Parish/Town Council £</b>
Beverston Parish	112	1,044.00	468.00
Bibury Parish	499	2,393.00	947.00
Cirencester Town, Abbey Ward	1899	8,393.00	3,184.00
Cirencester Town, Four Acres Ward	1556	7,039.00	2,694.00
Cirencester Town, Stratton Ward	2070	8,673.00	3,282.00
Cirencester Town, Watermoor Ward	2081	8,836.00	3,355.00
Driffield Parish	119	1,192.00	536.00
Hatherop Parish	137	1,175.00	518.00
Longborough Parish	383	1,996.00	801.00
Maugersbury Parish	115	1,004.00	442.00
Moreton-in-Marsh Town	3691	14,440.00	5,405.00
Rendcomb Parish	183	1,177.00	494.00
Shipton Moyne Parish	224	1,350.00	563.00
Somerford Keynes Parish	404	1,993.00	789.00
Southrop Parish	210	1,272.00	526.00
Stow-on-the-Wold Town	1644	7,194.00	2,747.00



Tetbury Town Council	4659	19,386.00	7,316.00
Upper Rissington Parish	1404	5,744.00	2,200.00
		<b>94,301.00</b>	<b>36,267.00</b>

A full list of estimated costs for combined and standalone parish council elections is shown in Annex I.

### 3. TOWN AND PARISH COUNCIL ENGAGEMENT

- 3.1 At the Cabinet meeting on 6 December, it was clear that some Town and Parish councils felt there had not been enough time for them to understand and consider the implications of recharging prior to the publication of the report.
- 3.2 As a result, the Cabinet deferred a decision on the proposal to its meeting on 10 January 2022 to allow time for discussion and communication with Town and Parish councils to take place.
- 3.3 Town and Parish Council Clerks and Councillors and Ward Councillors were subsequently invited to attend one of two virtual 'conversations' hosted by Cllr Joe Harris, together with Cllr Mike Evely, the Chief Executive and the Elections Manager. These online conversations were set up with the following aims:
- To listen to the concerns of those attending, and seek to provide answers to questions raised
  - To explain the rationale behind the Cabinet paper and intention to charge (from both a national and local finance context)
  - To provide further clarity on how the proposed election fees had been generated, including a step by step run through presented by the Elections Manager.
- 3.4 27 members and clerks of Town or Parish Councils attended the virtual meetings, including two CDC councillors who are also town councillors. (Cllr Patrick Coleman and Cllr Nikki Ind) In addition, Alison Robinson, Chief Executive Officer for the Gloucestershire Association of Parish and Town Councils (GAPTC) was invited to attend, and provided some valuable context and insight.
- 3.5 The meetings were, with the permission of those attending, recorded. The full recordings can be provided upon request.



## SUMMARY OF OUTCOMES FROM DISCUSSIONS WITH TOWN AND PARISH COUNCILS

- 3.6** Some attendees felt the District Council should continue to meet the costs of local elections across the District, being in a better position to budget for such expenses that the Town or Parish Councils were.
- 3.7** Some felt that with the uncertainty on how frequently or otherwise a local election may arise, it would be difficult to estimate how much to consider raising the precept to cover such eventualities.
- 3.8** The majority of attendees felt that there had been a lack of communication with Town and Parish Councils on the proposals to introduce charging. Many felt this put them in a very difficult position, having already set their precepts and that the proposals went 'against the grain' of looking to develop better communication and relationships between the towns/parishes and the District Council.
- 3.9** Whilst most attendees made it clear they would prefer that Cotswold District Council did not introduce charging as proposed and set out in this report, most also understood the principle/reasoning following the presentations and subsequent discussion around the national and local financial context.
- 3.10** Helpful local context was provided by GAPTC noting that Cotswold District Council was the only Council in Gloucestershire that met all costs associated with town and parish council elections. From a GAPTC perspective, the key issue was the proposed timeline associated with introducing these charges (which appeared unreasonable in terms of lead in times and to allow for precept budgeting) and whether there was scope to consider a phased approach to passing these costs on to the Town and Parish Councils. Some attendees shared the view that a greater amount of lead in time and a phased approach would be far more appropriate.
- 3.11** Attendees found the Election Manager's presentation helpful, as it provided clarity on the likely costs associated with local elections. There were a number of specific questions following the presentation, (including how the fees and charges associated with elections were set - whether this was done locally or nationally, whether the fees were subject to VAT and whether the estimate of costs provided, represented the maximum fees likely to be associated with the specific elements of running an election - which it was confirmed they did. A breakdown of estimated charges for parish/town councils of various sizes was provided by the Elections Manager and is shown as Annexe 2 to this report.
- 3.12** It was agreed that the presentation given by the Elections Manager at the virtual sessions would be shared with all Town and Parish councils via email.



**3.13** It is therefore proposed that following the conversations with Town and Parish Councils and further consideration;

- *That the Cabinet agrees to recharge Town and Parish Councils for contested 4-yearly elections at a rate of 50% of their share of the cost in 2023 and 100% of their share in 2027 and thereafter*
- 
- *That the Cabinet agrees to recharge Town and Parish Councils for contested by-elections taking place on or after the dates shown at the rates indicated:*
  - *from 01/04/2024 - 50% of the cost*
  - *from 01/04/2025 - 75% of the cost*
  - *from 01/04/2026 - 100% of the cost*

The proposals above, would result in an estimated saving to the Council of approximately £50,000 over the four years 2023/24 to 2026/27 and £90,000 over the subsequent four years.

#### **4. LEGAL IMPLICATIONS**

**4.1** Other than the legal issues referred to there are no other legal implications arising directly from this Report.

#### **5. RISK ASSESSMENT**

**5.1** There is a risk that the Parish/Town Councils would be unable to meet the cost of elections. However, they are able to precept for these costs. Giving as much notice as possible and phasing in the level of costs to be charged to the Parish/Town Councils will help alleviate this risk.

**5.2** There is also a need to reduce reputational risk by making sure that the proposal and consequent decision is communicated effectively and in a timely manner to the Parish/Town Councils.

#### **6. ALTERNATIVE OPTIONS**

**6.1** There are four additional options that could be considered, as detailed in the table below, together with the financial implications associated with each option. The estimated costs are based on a full district election with 18 contested Parishes/Towns being £150,000 plus £50,000 for by-elections across the 4-year term. The recommendation outlined in 3.13 above is a variation of option 4 below.



Option		Split of costs	Cost to District Councils (across 4 years)	Cost to Parish/Town Councils
1	No change to current arrangements	District Council absorbs all costs	£200,000	£0
2	Recharge Parish/Town Councils for contested 4-yearly elections but not by-elections	District Council splits costs for 4-yearly elections with contested parish/towns.  District Council meets cost of any Parish/Town By-elections	Approximately £160,000	Approximately, £40,000  (based on estimates given above)
3	Recharge Parish/Town Councils for by-elections but not 4-yearly elections	District Council absorbs the cost of 4-yearly elections.  Costs for By-elections are met by relevant Parish/Town Council	£150,000	£50,000
4	Recharge Parish/Town Councils for all elections with combined elections split across election types	4-yearly election costs split between District and Parish/Town.  By-election costs met by relevant Parish/Town Council	£110,000	£90,000

(END)

## Indicative costs for Town and Parish Council elections

The table below shows the figures for each Town/ Parish council for:

- The cost of a single seat by-election for the Town/ Parish council
- The cost of a shared election (where a Town/ Parish election is held at the same time as a district, county, national or other election where costs would be shared)

The figures are calculated using the agreed Scale of Fees for Elections in use throughout Gloucestershire. This gives the maximum amount that can be spent on staff costs. Any actual and necessary costs such as polling station hire charges, printing and postage costs are based on current figures. More accurate costs would be provided at the time of a by-election and at least 6 months before the ordinary elections in May 2023. This proposal would not affect parish meetings and therefore they are not listed in the table.

The figures in this document are based on the following assumptions:

- electorate , postal and proxy voter figures at 1 December 2021
- the usual number of polling stations for each area
- the usual number of polling station staff plus a polling station inspector
- the maximum budget amounts for clerical staff (admin, postal vote issue/opening and count)
- the maximum amount for Returning Officer and Deputy Returning Officer
- poll card, postal vote pack and ballot paper printing based on current print prices
- postage costs based on current Royal Mail figures
- a base amount per polling station for printing and supply of equipment
- average cost of polling station hire based on the May 2021 hire costs
- an estimate of the cost of delivery/collection of voting screens and equipment

### **There will be no charge for uncontested elections**

Area	Total cost of single-seat by-election	Total cost to T&P council for combined election
Aldsworth Parish Council	1,800.00	1,000.00
Ampney Crucis Parish Council	2,300.00	1,300.00
Andoversford Parish Council	2,400.00	1,400.00
Avening Parish Council	2,700.00	1,500.00
Bagendon Parish Council	2,000.00	1,100.00

Barrington Parish Council	1,800.00	1,000.00
Baunton Parish Council	2,000.00	1,100.00
Beverston Parish Council	1,700.00	900.00
Bibury Parish Council	2,400.00	1,300.00
Bledington Parish Council	2,100.00	1,100.00
Blockley Parish Council, Aston Magna Ward	2,100.00	1,200.00
Blockley Parish Council, Blockley Ward	2,900.00	1,700.00
Blockley Parish, Paxford Ward	2,000.00	1,100.00
Bourton-on-the-Hill Parish Council	2,000.00	1,100.00
Bourton-on-the-Water Parish Council	7,000.00	4,000.00
Boxwell with Leighterton Parish Council	1,900.00	1,000.00
Brimpsfield Parish Council, Brimpsfield Ward	1,900.00	1,000.00
Brimpsfield Parish Council, Caudle Green Ward	1,700.00	900.00
Broadwell Parish Council	2,100.00	1,100.00
Chedworth Parish Council	2,500.00	1,400.00
Cherington Parish Council	1,700.00	900.00
Chipping Campden Town Council	5,100.00	2,900.00
Cirencester Town Council, Abbey Ward	5,500.00	3,100.00
Cirencester Town Council, Chesterton Ward	4,900.00	2,800.00
Cirencester Town Council, Four Acres Ward	4,900.00	2,800.00
Cirencester Town Council, New Mills Ward	5,200.00	3,000.00

Cirencester Town Council, St Michael's Ward	5,100.00	2,900.00
Cirencester Town Council, Stratton Ward	5,700.00	3,200.00
Cirencester Town Council, The Beeches Ward	5,700.00	3,200.00
Cirencester Town Council, Watermoor Ward	5,400.00	3,100.00
Coates Parish Council	2,200.00	1,200.00
Coberley Parish Council	2,000.00	1,100.00
Cold Aston Parish Council	1,900.00	1,000.00
Coln St Aldwyns Parish Council	1,900.00	1,000.00
Con St Dennis Parish Council	1,900.00	1,000.00
Condicote Parish Council	1,700.00	900.00
Cowley Parish Council	2,100.00	1,100.00
Cutsdean Parish Council	1,700.00	900.00
Daglingworth Parish Council	1,900.00	1,000.00
Didmarton Parish Council	2,000.00	1,100.00
Dowdeswell Parish Council	1,800.00	900.00
Down Ampney Parish Council	2,300.00	1,300.00
Driffield Parish Council	1,800.00	1,000.00
Duntisbourne Abbots Parish Council	1,900.00	1,000.00
Duntisbourne Rouse Parish Council	1,700.00	900.00
Eastleach Parish Council	2,000.00	1,100.00
Ebrington Parish Council	2,300.00	1,300.00
Elkstone Parish Council	1,800.00	1,000.00
Evenlode Parish Council	1,800.00	1,000.00
Fairford Town Council	7,000.00	4,000.00

Great Rissington Parish Council	2,100.00	1,100.00
Guiting Power Parish Council	1,900.00	1,000.00
Hatherop Parish Council	1,800.00	1,000.00
Kemble & Ewen Parish Council	3,000.00	1,700.00
Kempsford Parish Council	2,800.00	1,600.00
Kingscote Parish Council	1,900.00	1,000.00
Lechlade-on-Thames Town Council	6,100.00	3,500.00
Little Rissington Parish Council	1,900.00	1,000.00
Long Newnton Parish Council	1,800.00	1,000.00
Longborough Parish Council	2,200.00	1,200.00
Lower Slaughter Parish Council	1,800.00	1,000.00
Maisey hampton Parish Council	2,400.00	1,300.00
Maugersbury Parish Council	1,800.00	1,000.00
Mickleton Parish Council	4,200.00	2,500.00
Moreton-in-Marsh Town Council	7,700.00	4,500.00
Naunton Parish Council	2,000.00	1,100.00
North Cerney Parish Council	2,300.00	1,200.00
Northleach with Eastington Town Council	4,000.00	2,300.00
Oddington Parish Council	2,000.00	1,100.00
Poultton Parish Council	2,200.00	1,200.00
Preston Parish Council	2,000.00	1,100.00
Quenington Parish Council	2,200.00	1,200.00
Rendcomb Parish Council	1,800.00	1,000.00
Rodmarton Parish Council	2,000.00	1,100.00
Sapperton Parish Council	2,100.00	1,100.00
Sevenhampton Parish Council	2,100.00	1,100.00

Sherborne Parish Council	1,900.00	1,100.00
Shipton Parish Council	2,000.00	1,100.00
Shipton Moyne Parish Council	2,000.00	1,100.00
Siddington Parish Council	3,300.00	1,900.00
Somerford Keynes Parish Council	2,200.00	1,200.00
South Cerney Parish Council	7,300.00	4,200.00
Southrop Parish Council	1,900.00	1,000.00
Stow-on-the-Wold Town Council	4,800.00	2,700.00
Swell Parish Council	2,000.00	1,100.00
Temple Guiting Parish Council	2,000.00	1,100.00
Tetbury Town Council	10,400.00	6,100.00
Tetbury Upton Parish Council	2,000.00	1,100.00
Todenham Parish Council	1,900.00	1,000.00
Upper Rissington Parish Council	3,600.00	2,100.00
Upper Slaughter Parish Council	1,800.00	1,000.00
Weston-sub-Edge Parish Council	2,000.00	1,100.00
Westonbirt with Lasborough Parish Council	1,900.00	1,000.00
Willersey Parish Council	2,700.00	1,600.00
Winstone Parish Council	1,900.00	1,000.00
Withington Parish Council	2,300.00	1,300.00
Wyck Rissington Parish Council	1,800.00	900.00

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Area	Electors	Postal Ballot Papers	Ordinary Ballot Papers	Polling stations	Poll clerks	Postal	Proxy	Postal Proxy	poll card printing (per card)	poll card postage (per card)	postal vote packs (per pack)	postal vote postage (outward & return)	ballot papers (per paper)	presiding officers	poll clerks	polling station inspector	equipment and stationery (per polling station)	polling station hire (average cost)	delivery costs (average costs)	Returning Officer and Deputy Returning Officer costs (nomination checking, supervision of postal vote issue/opening and count)	postal vote, count and admin staff	Total cost of single-seat by-election	Total cost to T&P council for combined election
									0.04	0.36	0.3	1.6	0.31	226	169	226	11.7	250	120	maximum	maximum	Maximum	Maximum
Aldsworth Parish Council	181	100	200	1	1	27	0	0	7.24	65.16	8.10	43.20	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	351.54	1,800.00	1,000.00
Ampney Crucis Parish Council	487	200	500	1	1	94	0	2	19.48	175.32	28.80	153.60	217.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	492.70	2,300.00	1,300.00
Andoversford Parish Council	595	200	600	1	1	101	0	0	23.80	214.20	30.30	161.60	248.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	500.73	2,400.00	1,400.00
Avening Parish Council	849	200	800	1	1	126	0	0	33.96	305.64	37.80	201.60	310.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	588.86	2,700.00	1,500.00
Bagendon Parish Council	206	100	200	1	1	74	0	0	8.24	74.16	22.20	118.40	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	436.19	2,000.00	1,100.00
Barrington Parish Council	151	100	200	1	1	30	0	0	6.04	54.36	9.00	48.00	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	355.16	1,800.00	1,000.00
Baunton Parish Council	232	100	200	1	1	58	0	0	9.28	83.52	17.40	92.80	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	416.90	2,000.00	1,100.00
Beverston Parish Council	105	100	100	1	1	15	0	0	4.20	37.80	4.50	24.00	62.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	337.08	1,700.00	900.00
Bibury Parish Council	474	200	500	1	1	109	0	1	18.96	170.64	33.00	176.00	217.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	509.58	2,400.00	1,300.00
Bledington Parish Council	379	100	400	1	1	53	0	0	15.16	136.44	15.90	84.80	155.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	412.88	2,100.00	1,100.00
Blockley Parish Council, Aston Magna Ward	406	100	400	1	1	59	0	1	16.24	146.16	18.00	96.00	155.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	449.32	2,100.00	1,200.00
Blockley Parish Council, Blockley Ward	970	200	1,000	1	1	141	0	1	38.80	349.20	42.60	227.20	372.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	610.15	2,900.00	1,700.00
Blockley Parish, Paxford Ward	257	100	300	1	1	53	2	0	10.28	92.52	15.90	84.80	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	410.88	2,000.00	1,100.00
Bourton-on-the-Hill Parish Council	249	100	300	1	1	55	0	1	9.96	89.64	16.80	89.60	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	414.49	2,000.00	1,100.00
Bourton-on-the-Water Parish Council	3118	800	2,500	3	3	596	0	1	124.72	1122.48	179.10	955.20	1023.00	678.00	507.00	226.00	35.10	250.00	120.00	204.00	1488.54	7,000.00	4,000.00
Boxwell with Leighterton Parish Council	199	100	200	1	1	48	0	0	7.96	71.64	14.40	76.80	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	376.85	1,900.00	1,000.00
Brimpsfield Parish Council, Brimpsfield Ward	191	100	200	1	1	47	0	1	7.64	68.76	14.40	76.80	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	376.85	1,900.00	1,000.00
Brimpsfield Parish Council, Caudle Green Ward	46	100	100	1	1	15	0	1	1.84	16.56	4.80	25.60	62.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	336.28	1,700.00	900.00
Broadwell Parish Council	289	100	300	1	1	68	0	0	11.56	104.04	20.40	108.80	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	428.96	2,100.00	1,100.00
Chedworth Parish Council	617	200	600	1	1	122	0	3	24.68	222.12	37.50	200.00	248.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	557.66	2,500.00	1,400.00
Cherington Parish Council	92	100	100	1	1	16	0	0	3.68	33.12	4.80	25.60	62.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	336.28	1,700.00	900.00
Chipping Campden Town Council	1973	500	1,800	2	4	321	0	1	78.92	710.28	96.60	515.20	713.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	977.09	5,100.00	2,900.00
Cirencester Town Council, Abbey Ward	1863	600	1,600	2	4	466	0	1	74.52	670.68	140.10	747.20	682.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	1149.86	5,500.00	3,100.00
Cirencester Town Council, Chesterton Ward	1783	400	1,700	2	4	313	1	1	71.32	641.88	94.20	502.40	651.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	937.45	4,900.00	2,800.00
Cirencester Town Council, Four Acres Ward	1519	500	1,300	2	4	389	0	0	60.76	546.84	116.70	622.40	558.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	997.85	4,900.00	2,800.00
Cirencester Town Council, New Mills Ward	1845	500	1,600	2	4	396	0	0	73.80	664.20	118.80	633.60	651.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	1064.28	5,200.00	3,000.00
Cirencester Town Council, St Michael's Ward	1799	500	1,600	2	4	389	1	0	71.96	647.64	116.70	622.40	651.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	1027.85	5,100.00	2,900.00
Cirencester Town Council, Stratton Ward	2068	700	1,600	2	4	488	0	1	82.72	744.48	146.70	782.40	713.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	1206.37	5,700.00	3,200.00
Cirencester Town Council, The Beeches Ward	2185	600	1,700	2	4	478	1	1	87.40	786.60	143.70	766.40	713.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	1196.32	5,700.00	3,200.00
Cirencester Town Council, Watermoor Ward	2019	500	1,900	2	4	389	0	3	80.76	726.84	117.60	627.20	744.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	1089.46	5,400.00	3,100.00
Coates Parish Council	364	100	400	1	1	79	0	0	14.56	131.04	23.70	126.40	155.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	444.22	2,200.00	1,200.00
Coberley Parish Council	233	100	300	1	1	45	0	1	9.32	83.88	13.80	73.60	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	402.44	2,000.00	1,100.00
Cold Aston Parish Council	213	100	200	1	1	35	0	1	8.52	76.68	10.80	57.60	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	390.39	1,900.00	1,000.00
Coln St Aldwyns Parish Council	201	100	200	1	1	44	0	1	8.04	72.36	13.50	72.00	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	401.24	1,900.00	1,000.00
Con St Dennis Parish Council	152	100	200	1	1	43	0	0	6.08	54.72	12.90	68.80	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	370.83	1,900.00	1,000.00
Condicote Parish Council	116	100	200	1	1	10	0	0	4.64	41.76	3.00	16.00	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	331.05	1,700.00	900.00
Cowley Parish Council	309	100	300	1	1	75	0	0	12.36	111.24	22.50	120.00	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	439.39	2,100.00	1,100.00
Cutsdean Parish Council	56	100	100	1	1	4	0	0	2.24	20.16	1.20	6.40	62.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	321.82	1,700.00	900.00
Daglingworth Parish Council	209	100	200	1	1	40	0	1	8.36	75.24	12.30	65.60	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	396.42	1,900.00	1,000.00
Didmarton Parish Council	327	100	400	1	1	43	1	1	13.08	117.72	13.20	70.40	155.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	402.03	2,000.00	1,100.00
Dowdeswell Parish Council	109	100	100	1	1	30	0	0	4.36	39.24	9.00	48.00	62.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	355.16	1,800.00	900.00
Down Ampney Parish Council	465	200	500	1	1	91	0	2	18.60	167.40	27.90	148.80	217.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	489.09	2,300.00	1,300.00
Driffield Parish Council	130	100	200	1	1	30	1	0	5.20	46.80	9.00	48.00	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	355.16	1,800.00	1,000.00
Duntisbourne Abbots Parish Council	200	100	200	1	1	59	0	0	8.00	72.00	17.70	94.40	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	390.11	1,900.00	1,000.00
Duntisbourne Rouse Parish Council	45	100	100	1	1	11	0	0	1.80	16.20	3.30	17.60	62.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	330.26	1,700.00	900.00
Eastleach Parish Council	247	100	300	1	1	49	0	2	9.88	88.92	15.30	81.60	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	408.47	2,000.00	1,100.00

Ebrington Parish Council	516	100	500	1	1	77	0	0	20.64	185.76	23.10	123.20	186.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	471.80	2,300.00	1,300.00
Elkstone Parish Council	182	100	200	1	1	26	0	0	7.28	65.52	7.80	41.60	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	350.34	1,800.00	1,000.00
Evenlode Parish Council	123	100	200	1	1	19	0	0	4.92	44.28	5.70	30.40	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	341.90	1,800.00	1,000.00
Fairford Town Council	3185	800	2,500	2	4	612	0	3	127.40	1146.60	184.50	984.00	1023.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	1510.23	7,000.00	4,000.00
Great Rissington Parish Council	295	100	300	1	1	68	0	0	11.80	106.20	20.40	108.80	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	428.96	2,100.00	1,100.00
Guiting Power Parish Council	242	100	300	1	1	25	0	0	9.68	87.12	7.50	40.00	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	377.13	1,900.00	1,000.00
Hatherop Parish Council	131	100	200	1	1	23	0	0	5.24	47.16	6.90	36.80	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	346.72	1,800.00	1,000.00
Kemble & Ewen Parish Council	903	300	800	1	1	201	0	2	36.12	325.08	60.90	324.80	341.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	683.67	3,000.00	1,700.00
Kempsford Parish Council	891	200	900	1	1	123	0	1	35.64	320.76	37.20	198.40	341.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	586.45	2,800.00	1,600.00
Kingscote Parish Council	213	100	200	1	1	34	0	0	8.52	76.68	10.20	54.40	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	387.98	1,900.00	1,000.00
Lechlade-on-Thames Town Council	2546	700	2,000	2	4	503	3	2	101.84	916.56	151.50	808.00	837.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	1287.66	6,100.00	3,500.00
Littlie Rissington Parish Council	192	100	200	1	1	36	0	1	7.68	69.12	11.10	59.20	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	363.59	1,900.00	1,000.00
Long Newton Parish Council	150	100	200	1	1	35	0	0	6.00	54.00	10.50	56.00	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	361.18	1,800.00	1,000.00
Longborough Parish Council	402	200	400	1	1	83	0	0	16.08	144.72	24.90	132.80	186.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	477.04	2,200.00	1,200.00
Lower Slaughter Parish Council	172	100	200	1	1	34	0	0	6.88	61.92	10.20	54.40	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	359.98	1,800.00	1,000.00
Maiseyhampton Parish Council	454	200	400	1	1	112	0	1	18.16	163.44	33.90	180.80	186.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	513.19	2,400.00	1,300.00
Maugersbury Parish Council	121	100	200	1	1	22	0	0	4.84	43.56	6.60	35.20	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	345.52	1,800.00	1,000.00
Mickleton	1744	400	1,600	1	2	297	0	4	69.76	627.84	90.30	481.60	620.00	226.00	338.00	226.00	11.70	250.00	120.00	204.00	921.78	4,200.00	2,500.00
Moreton-in-Marsh Town Council	3846	800	3,400	2	4	625	0	1	153.84	1384.56	187.80	1001.60	1302.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	1641.49	7,700.00	4,500.00
Naunton	273	100	300	1	1	60	0	2	10.92	98.28	18.60	99.20	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	421.73	2,000.00	1,100.00
North Cerney	435	200	400	1	1	86	0	0	17.40	156.60	25.80	137.60	186.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	480.65	2,300.00	1,200.00
Northleach with Eastington Town Council	1475	400	1,400	1	2	274	1	1	59.00	531.00	82.50	440.00	558.00	226.00	338.00	226.00	11.70	250.00	120.00	204.00	858.45	4,000.00	2,300.00
Oddington	314	100	300	1	1	48	0	0	12.56	113.04	14.40	76.80	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	406.85	2,000.00	1,100.00
Poultton Parish Council	348	200	300	1	1	84	0	1	13.92	125.28	25.50	136.00	155.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	451.45	2,200.00	1,200.00
Preston Parish Council	234	100	300	1	1	43	0	0	9.36	84.24	12.90	68.80	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	398.83	2,000.00	1,100.00
Quenington Parish Council	440	200	400	1	1	80	0	1	17.60	158.40	24.30	129.60	186.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	474.63	2,200.00	1,200.00
Rendcomb	168	100	200	1	1	30	0	0	6.72	60.48	9.00	48.00	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	355.16	1,800.00	1,000.00
Rodmarton	299	100	300	1	1	44	0	0	11.96	107.64	13.20	70.40	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	400.03	2,000.00	1,100.00
Sapperton	344	100	400	1	1	48	0	4	13.76	123.84	15.60	83.20	155.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	411.67	2,100.00	1,100.00
Sevenhampton	272	100	300	1	1	69	0	0	10.88	97.92	20.70	110.40	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	430.16	2,100.00	1,100.00
Sherborne	249	100	300	1	1	32	0	0	9.96	89.64	9.60	51.20	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	385.57	1,900.00	1,100.00
Shipton	289	100	300	1	1	40	0	2	11.56	104.04	12.60	67.20	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	397.62	2,000.00	1,100.00
Shipton Moyne	222	100	200	1	1	61	0	0	8.88	79.92	18.30	97.60	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	420.52	2,000.00	1,100.00
Siddington	1069	300	1,000	1	1	232	0	0	42.76	384.84	69.60	371.20	403.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	746.62	3,300.00	1,900.00
Somerford Keynes	424	200	400	1	1	81	1	0	16.96	152.64	24.30	129.60	186.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	474.63	2,200.00	1,200.00
South Cerney Parish Council	3016	800	2,400	3	5	625	0	1	120.64	1085.76	187.80	1001.60	992.00	678.00	845.00	226.00	35.10	250.00	120.00	204.00	1521.49	7,300.00	4,200.00
Southrop	213	100	200	1	1	46	0	0	8.52	76.68	13.80	73.60	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	402.44	1,900.00	1,000.00
Stow-on-the-Wold Town Council	1576	500	1,500	2	4	323	0	0	63.04	567.36	96.90	516.80	620.00	452.00	676.00	226.00	23.40	250.00	120.00	204.00	918.30	4,800.00	2,700.00
Swell	331	100	300	1	1	58	1	1	13.24	119.16	17.70	94.40	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	420.11	2,000.00	1,100.00
Temple Guiting	315	100	300	1	1	58	0	0	12.60	113.40	17.40	92.80	124.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	418.90	2,000.00	1,100.00
Tetbury Town Council	5002	1,300	4,000	3	6	1,013	1	5	200.08	1800.72	305.40	1628.80	1643.00	678.00	1014.00	226.00	35.10	250.00	120.00	204.00	2293.95	10,400.00	6,100.00
Tetbury Upton	226	100	200	1	1	55	0	1	9.04	81.36	16.80	89.60	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	414.49	2,000.00	1,100.00
Todenham	215	100	200	1	1	46	0	0	8.60	77.40	13.80	73.60	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	402.44	1,900.00	1,000.00
Upper Rissington	1417	300	1,400	1	2	188	1	2	56.68	510.12	57.00	304.00	527.00	226.00	338.00	226.00	11.70	250.00	120.00	204.00	756.00	3,600.00	2,100.00
Upper Slaughter	131	100	200	1	1	22	0	0	5.24	47.16	6.60	35.20	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	345.52	1,800.00	1,000.00
Weston-sub-Edge	341	100	400	1	1	41	0	0	13.64	122.76	12.30	65.60	155.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	398.42	2,000.00	1,100.00
Westonbirt with Lasborough	161	100	200	1	1	48	0	0	6.44	57.96	14.40	76.80	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	376.85	1,900.00	1,000.00
Willesley	830	200	800	1	1	132	0	0	33.20	298.80	39.60	211.20	310.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	596.09	2,700.00	1,600.00
Winstone	188	100	200	1	1	35	0	0	7.52	67.68	10.50	56.00	93.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	361.18	1,900.00	1,000.00
Withington	405	200	400	1	1	101	0	0	16.20	145.80	30.30	161.60	186.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	498.73	2,300.00	1,300.00
Wyck Rissington	94	100	100	1	1	29	0	0	3.76	33.84	8.70	46.40	62.00	226.00	169.00	226.00	11.70	250.00	120.00	204.00	351.95	1,800.00	900.00

Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET - 10 JANUARY 2022
Report Number	AGENDA ITEM 9
Subject	REVIEW OF PARKING CHARGES AND SEASON TICKETS
Wards affected	<p>All wards in the District are impacted as residents, visitors and businesses will use car parks across the District but the following wards are particularly impacted:</p> <p>In Cirencester, the following Wards: Abbey, Four Acres, Watermoor and St. Michaels.</p> <p>In Tetbury, the following Wards: Tetbury East &amp; Rural, Tetbury Town and Tetbury with Upton.</p> <p>Moreton West</p> <p>Bourton Vale and Bourton Village.</p> <p>Stow.</p>
Accountable member	<p>Cllr Mike Evemy, Deputy Leader and Cabinet Member for Finance</p> <p>Email: <a href="mailto:mike.evemy@cotswold.gov.uk">mike.evemy@cotswold.gov.uk</a></p>
Accountable officer	<p>Maria Wheatley - Parking Manager</p> <p>Email: <a href="mailto:maria.wheatley@publicagroup.uk">maria.wheatley@publicagroup.uk</a></p>
Summary/Purpose	<i>The report proposes changes to the charges, charging periods, season ticket allocation and season ticket fees in the District car parks.</i>
Annexes	<p>Annex A: Current car park tariff charges</p> <p>Annex B: Proposed car park tariff</p> <p>Annex C: Current season ticket charges</p> <p>Annex D: Proposed season ticket charges</p>
Recommendation(s)	<p><i>That Cabinet considers and approves:</i></p> <p><i>a) aligning charging periods for all car parks owned by the Council to 8am to 6pm on Mondays to Saturdays, removing the ‘free after 3 pm’ concession from six car parks;</i></p>



	<p>b) <i>the removal of the four hour charging period in the Forum car park to encourage the use of the car park for short stay purposes;</i></p> <p>c) <i>the proposal to align charges across the District over time;</i></p> <p>d) <i>the proposed increases to charges in Church Street and West Street in Tetbury to improve the availability of parking spaces;</i></p> <p>e) <i>the proposed increase to charges in Old Market Way in Moreton in Marsh to move towards alignment of car parking charges across the District;</i></p> <p>f) <i>the introduction of charges for the large vehicle bays reserved for coaches and minibuses at the Mangersbury Road car park in Stow-on-the-Wold;</i></p> <p>g) <i>that car park charges, are increased by 5% (rounded up to nearest 10p), to reflect the impact of inflation since April 2020;</i></p> <p>h) <i>implementing a maximum season ticket allocation of 50% in each car park;</i></p> <p>i) <i>removal of the Nursery permit;</i></p> <p>j) <i>increasing the fee for season tickets as per Annex D, a higher than inflationary increase to reduce the level of subsidy offered for season tickets;</i></p> <p>k) <i>reducing the season ticket fee for the Whiteway car park to reflect the fact that it can only be used Monday to Friday rather than Monday to Saturday as in the other Cirencester car parks;</i></p> <p>l) <i>introducing three month and six month season tickets in the Whiteway car park in line with all other season tickets.</i></p> <p>m) <i>the requirement to invest in the Council's car parks through its Capital Programme to be considered by Cabinet and Council in February 2022.</i></p> <p>n) <i>an update the Parking Order to enable enforcement action to be taken for vehicles utilising parking spaces equipped with Electric Vehicle Charging Points in all Council owned car parks; and</i></p> <p>o) <i>delegating authority to consider the Parking Order consultation responses to the Deputy Chief Executive in consultation with the Deputy Leader of the Council and Cabinet Member for Finance.</i></p>
Corporate priorities	<ul style="list-style-type: none"> <li>● delivering our services to the highest standards</li> </ul>
Key Decision	NO
Exempt	NO
Consultees/	The Leader of the Council, The Deputy Leader and Cabinet Member for



Consultation	<p>Finance, The Chief Executive and Deputy Chief Executive Officers, The Monitoring Officer, The Interim Head of Legal Services, The Finance Business Partner, The Group Manager for Resident Services.</p> <p>The Council consulted on changes to car park charging periods as part of the budget consultation carried out from the period 5 October 2021 to 19 November 2021. Feedback from this consultation is contained in the body of the report at section 3.</p> <p>Further statutory and public consultation will be carried out as part of the process to make changes to the Off-Street Parking Order.</p>
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## I. BACKGROUND

- I.1 In February 2020, as part of the Council's budget setting process for 2020/21, a review of car park charges was carried out which resulted in the first increase in car park charges in ten years. It was further agreed that car park charges would be subsequently reviewed every two years. The next review is now due and will take effect for the 2022/23 financial year. This report sets out proposals for changes to charges, charging periods and season tickets for all Council owned car parks.
- I.2 Prior to the pandemic and the subsequent 'lock downs', Cirencester car parks were in high demand for spaces particularly Monday to Friday and many season ticket holders struggled to access spaces. For this reason a hold was placed on any new issues of season tickets. At that time, a maximum of 80% of any car park could be allocated for season ticket holders.
- I.3 The car park charges review for 2022/23 has compared the charging periods for each car park across the District. Consideration has been given to the charges for evenings, overnight and on Sundays. Currently, the majority of car parks are charged between 8am and 6pm, however some car parks are provided free of charge after 3 pm. Free after 3pm was introduced several years ago when Cirencester car parks were under pressure from high demand due to the Market Place refurbishment scheme and improvements to the Forum car park. Free after 3pm was introduced to draw shoppers into town at a less busy time of the day to spread the demand. Free after 3pm was removed from Rissington Road Car Park Bourton on the Water at the review in 2020 with no comments or complaints being received.
- I.4 The Council has a policy objective of understanding the cost of free or subsidised services. In light of this, the Council's policy on free parking stays was reviewed to question the appropriateness of this when compared to charged stays.



## 2. PROPOSED CHANGES TO PARKING CHARGES AND SEASON TICKETS

### Charging Periods and Parking Charges

- 2.1 The current car park charges are set out in **Annex A**. Car park charges were last increased in the 2020/21 financial year, following a ten year price freeze. Over the last two years the Retail Prices Index has increased by 6.0% and the Consumer Prices Index has increased by 4.2%. Using the inflationary indices as a guide, it is proposed that the Council's car park fees are increased from April 2022 by 5%, rounded up to the nearest 10p.
- 2.2 It is estimated that the opportunity cost of providing free car parking after 3 pm in certain car parks is £350,000. It is therefore proposed that each car park has the same charging periods of 8am to 6pm Monday to Saturday. The car parks impacted by the extension of charging from 3pm to 6pm are: Brewery and Forum in Cirencester, West Street and Church Street in Tetbury, Maugersbury Road in Stow on the Wold and Old Market Way in Moreton in Marsh.
- 2.3 Introducing charges for parking during evenings and overnight and on Sundays has been considered. However, respondents to the budget consultation ranked these options below charging between 3 pm and 6 pm. It is expected that charging between 3 pm and 6 pm in all car parks will meet the revenue budget requirement to increase income by £300,000. Therefore, it is not proposed to extend charging periods further.
- 2.4 In order to encourage long stay parking in car parks designated for that purpose in Cirencester, it is proposed to remove the 4 hour tariff in the Forum car park. The aim of this change is to increase turnover in the Forum car park enabling more town centre visitors to find a parking space.
- 2.5 There are currently parking capacity issues in Tetbury. Visitors can currently park for 3 hours in Church Street for £2.70, but an all day charge in West Street is £2.50. It is therefore cheaper to pay for all day parking in West Street than it is for 3 hours in adjoining Church Street. The Railyard car park within the town also offers free parking.
- 2.6 In order to improve the turnover of vehicles in the Church Street and West Street car parks, users need to be encouraged to use the free long stay Railyard car park. It is therefore proposed, over time, to align the charges in Tetbury to those in Cirencester and to introduce a 3 hour charge in the West Street. For clarity the current charges and the proposed changes are set out below:

#### Current Charges:



Location	½ hr	1 hour	2 hours	3 hours	10 hours
West Street	60p	90p	£1.80		£2.50
Church Street	60p	90p	£1.80	£2.70	

**Proposed Charges:**

Location	½ hour	1 hour	2 hours	3 hours	10 hours
West Street	70p	£1.10	£2.00	£2.90	£3.50
Church Street	70p	£1.10	£2.00	£2.90	

- 2.7** The parking charges at Old Market Way in Moreton in Marsh are currently lower than charges in Cirencester. There is no rationale for a lower charge in Moreton in Marsh as there is free on-street car parking available and the Council's car park charge would remain lower than the charges at the train station car park. It is therefore proposed that the car parking charges are harmonised across the District, over a period of time.
- 2.8** The large vehicle bays reserved for coaches and minibuses at the Mangersbury Road car park in Stow-on-the-Wold are currently provided free of charge. The cost of this subsidy is around £4,300 per annum. It is proposed that charges are introduced for these bays.
- 2.9** The proposed fees, reflecting all of the above changes, are attached at **Annex B**.

**Season Tickets**

- 2.10** A review has been carried out of the Council's current arrangements for season tickets and permits. Details of the current season ticket prices are included at **Annex C**.
- 2.11** The Council suspended the selling of season tickets in 2014/15 for Abbey Grounds, Waterloo, Old Station & Sheep Street car parks due to customers' concerns in respect of capacity issues. During the recent pandemic, agile working has become acceptable to some businesses and therefore capacity issues have subsided.
- 2.12** There is currently a waiting list of 49 customers requesting town centre car park season tickets. In order to allow all town centre car parks to be available to day visitors (meaning those without a season ticket) it is proposed to implement a maximum season ticket allocation policy of 50% for each car park.



- 2.13** In some car parks this will mean season tickets can be made available for allocation to those on the waiting list. In other car parks, where the number of season ticket permits exceeds 50% of spaces, renewals will be permitted but new season tickets will not be available. For example, this will result in no new season ticket sales for Abbey Grounds in Cirencester and West Street in Tetbury until the season ticket allocation is reduced to below 50%. The 49 customers on the waiting list will be contacted and offered a space in line with this policy. Once the offer has been made, it is proposed that the waiting list facility be removed.
- 2.14** The current “nursery permit” allows parking in either the Sheep Street or Old Station car parks in Cirencester as follows: Monday to Friday 08.45am to 09.15am, 15.15pm to 15.45pm and 17.15pm to 17.45pm. The permit costs £44 per year. There has never been a high demand for these permits and currently no demand at all. It is proposed, therefore, that the Nursery permit is removed.
- 2.15** The Council invested in the new Whiteway car park to increase car parking provision within Cirencester prior to the Covid-19 pandemic. The Whiteway car park is a permit holder only car park. Permits are currently available for a 12 month period at a cost of £550. In order to encourage take up of permits in this car park it is proposed that the annual fee is reduced to £500 as permit holders are unable to park on Saturdays, and that permit periods for the Whiteway car park include an option for 3 months and 6 months at £125 and £250 respectively.
- 2.16** It is proposed that a higher than inflation increase of 9% is applied to permits. In previous years, permits have been heavily discounted when compared to pay as you go use of the car parks. The increases will reduce the level of discount offered by £15,000.
- 2.17** The proposed season ticket arrangements are set out at **Annex D**.

### **Benchmarking charges**

- 2.18** A comparison of the current car parking charges with car parking charges at Cheltenham, Swindon, Gloucester City and Gloucestershire on-street parking charges in Cirencester is set out below:

Duration	Cotswold - Cirencester	Cheltenham	Swindon	Glos City	Glos CC-On Street Cirencester
1/2hr	£0.70				
1hr	£1.60	£1.70	£1.40	£1.40	£1.40
2hr	£2.80	£3.10	£2.80	£2.30	£2.80
3hr	£3.70	£4.50	£4.20	£3.50	-



4hr	£5.00	£6.00	£5.60	£4.50	-
10 hrs/all day	£7.50	£10/£12	£9.10/23.80	£6.00	-
Free periods	after 3pm in some	N/A	N/A		
Blue Badge	all free	1st 3 hours free	Unknown	1st 3 hours	
Charge period	8am-6pm	8am-8pm	6am-6pm/24 hrs	7am-7pm/6pm	8am-6pm
Sun	Mostly free	10am-8pm	As above	As above	

### Investment in Car Parks

- 2.19** The Council has a priority to tackle the climate emergency. The Council will therefore be installing more electric vehicle charging stations in its car parks. The Capital Programme includes £750,000 for investment in charging points.
- 2.20** The Council has also approved investment of £337,000 for refurbishment of the Rissington Road car park and work will take place during 2022.
- 2.21** The additional revenue generated from these proposals will support the capital financing costs of further investment in the Council's car park estate. An action plan is in preparation with the objective of ensuring that all of the Council car parks meet the latest parking standards, are modern and offer car park users the best possible experience.
- 2.22** In light of the objective of providing customers with the best possible experience, the Council has recently decided to change the way car parking enforcement is operated. Bringing this service within those services provided through Publica provides the Council with more control, flexibility and improves accountability to the Council.

### Enforcement

- 2.23** To ensure that the Council is able to enforce newly installed parking bays equipped with Electric Vehicle Charging Point in all Council owned car parks, it is proposed to update the Parking Orders to enable the enforcement team to issue Penalty Charge Notices where appropriate.



## Implementation

**2.24** If approval is given to increase the charges for day tariffs and season tickets the revised charges will come into effect on or around 4 April 2022. Part of the implementation process includes the Statutory Consultation period of 21 days for the variations to the parking order. Changes to systems and installation of new signs for customers will take 6 weeks.

## 3. BUDGET CONSULTATION FEEDBACK

**3.1** During the annual budget consultation process questions relating to car parks and charging periods were included. Residents were given a number of questions and asked to choose which statement they agreed with. These questions were as follows:

- a. I would like the 'free after 3pm' scheme to continue and for parking to remain free on Sundays and during evenings and overnight
- b. I would like to see free parking remain on Sundays, during evenings and overnight but think charges should be made between 3pm and 6pm in all car parks
- c. I think all free parking in the Council's car parks should be removed
- d. I would like the 'free after 3pm' scheme and free evening and overnight parking to continue but think charges should be made on Sundays
- e. I would like to see free parking remain during evenings and overnight but think charges should be made between 3pm and 6pm and on Sundays
- f. I would like to see free Sunday parking remain but think charges should be made after 3pm in all car parks and during evenings and overnight
- g. I would like the 'free after 3pm' scheme and free parking on Sundays to remain but I think charges should be made during evenings and overnight
- h. I would like the 'free after 3pm' scheme to continue but think charges should be made on Sundays and during evenings and overnight

**3.2** The table below sets out the responses to this question and the response information is also illustrated graphically.

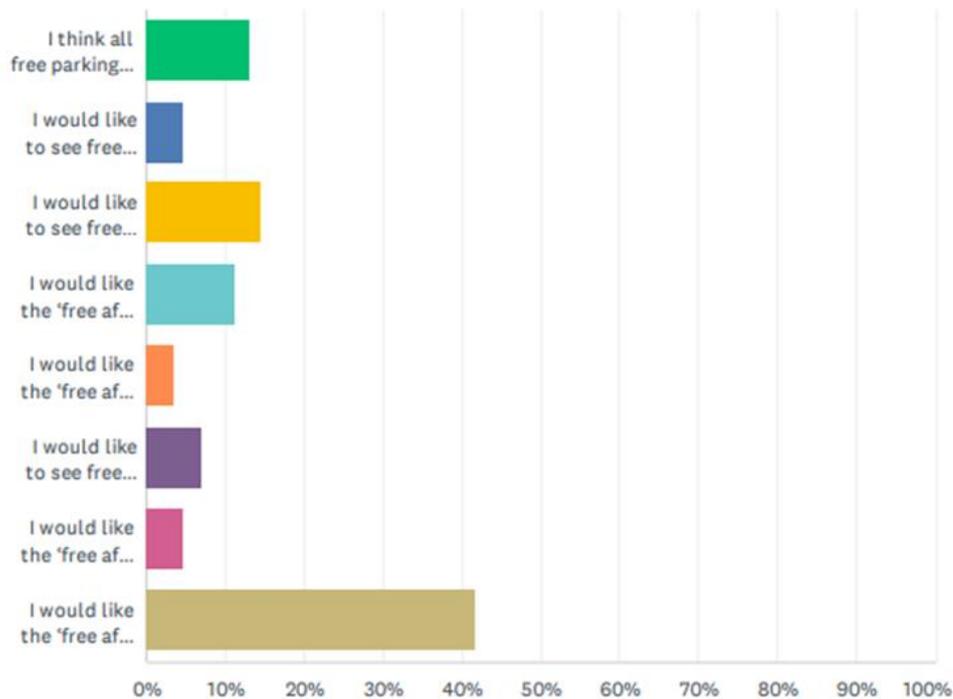
	Answer Choice	Response %	Response No.
--	---------------	------------	--------------



a	I think all free parking in the Council's car parks should be removed	13.02	56
b	I would like to see free Sunday parking remain but think charges should be made after 3pm in all car parks and during evenings and overnight	4.65	20
c	I would like to see free parking remain on Sundays, during evenings and overnight but think charges should be made between 3pm and 6pm in all car parks	14.42	62
d	I would like the 'free after 3pm' scheme and free evening and overnight parking to continue but think charges should be made on Sundays	11.16	48
e	I would like the 'free after 3pm' scheme to continue but think charges should be made on Sundays and during evenings and overnight	3.49	15
f	I would like to see free parking remain during evenings and overnight but think charges should be made between 3pm and 6pm and on Sundays	6.98	30
g	I would like the 'free after 3pm' scheme and free parking on Sundays to remain but I think charges should be made during evenings and overnight	4.65	20
h	I would like the 'free after 3pm' scheme to continue and for parking to remain free on Sundays and during evenings and overnight	41.63	179
	<b>No. of Responses</b>		<b>430</b>



Answered: 430 Skipped: 2



3.3 While 42% of respondents wanted no change to the current car park charging periods (answer h) 58% of respondents opted for a change. The options for change, listed in order of the number of responses, are set out below:

	Answer Choice	Response %	Response No.
c	I would like to see free parking remain on Sundays, during evenings and overnight but think charges should be made between 3pm and 6pm in all car parks	14.42	62
a	I think all free parking in the Council's car parks should be removed	13.02	56



d	I would like the 'free after 3pm' scheme and free evening and overnight parking to continue but think charges should be made on Sundays	11.16	48
f	I would like to see free parking remain during evenings and overnight but think charges should be made between 3pm and 6pm and on Sundays	6.98	30
b	I would like to see free Sunday parking remain but think charges should be made after 3pm in all car parks and during evenings and overnight	4.65	20
g	I would like the 'free after 3pm' scheme and free parking on Sundays to remain but I think charges should be made during evenings and overnight	4.65	20
e	I would like the 'free after 3pm' scheme to continue but think charges should be made on Sundays and during evenings and overnight	3.49	15

**3.4** The budget consultation requested feedback on options for removing free car parking in the evenings and overnight, between 3 pm and 6 pm and on Sundays. The number of respondents supporting each of these options is set out below:

	Charge for evenings and overnight	Charge between 3 pm and 6 pm	Charge on Sundays
c		62	
a	56	56	56
d			48
f		30	30



b	20	20	
g	20		
e	15		15
<b>Total</b>	<b>111</b>	<b>168</b>	<b>149</b>

- 3.5 The option which had the greatest support from respondents was to charge between 3 pm and 6 pm in all car parks with support from 168 respondents. Charging on Sundays in all car parks received support from 149 respondents with 111 respondents supporting charging during evenings and overnight.
- 3.6 As part of the legal process to change the Off-Street Parking Order, a statutory consultation will run for a 21 day period.
- 3.7 In order to implement these changes in a timely manner, delegation is proposed to the Deputy Leader and Cabinet Member for Finance to determine the final changes following receipt of any feedback from the statutory and public consultation.

#### 4. FINANCIAL IMPLICATIONS

- 4.1 The financial implications of the proposed changes to car park charges, charging periods and season tickets is set out below:

	Potential income at current charges
Removing free after 3 PM - and other amendments to charging periods	£350,000
Inflationary increase to car park fees and charges	£85,000
Changes to season ticket prices	£15,000
<b>Estimated Additional Income</b>	<b>£450,000</b>

- 4.2 The draft budget proposals for 2022/23 include additional income from changes to car park fees and charges of £300,000 and an inflationary increase of £100,000. The proposals set out above exceed the assumptions in the draft budget proposals by £50,000. However,



forecasting demand for car parking in 2022/23 is difficult due to the potential impact of Covid-19 on customer behaviour. It is possible that there could be further periods where the Government encourages work from home or imposes other limitations which would lead to reduced demand for car parking.

- 4.3** It is therefore proposed not to reflect the additional £50,000 in the budget proposals for 2022/23 but to review the car park income budget to reflect demand as part of the 2023/24 budget process. This provides a contingency of £50,000 (11% of the estimated increase in income) in the 2022/23 budget.

## **5. LEGAL IMPLICATIONS**

- 5.1** Any changes to the existing terms and conditions and or charges in the car parks will require a variation to the Off-Street Parking Order.

## **6. RISK ASSESSMENT**

- 6.1** Demand for car parking is uncertain. The Covid-19 pandemic has changed customer behaviour, for example, many businesses are encouraging home working and shopping habits have changed with increased use of online shopping. More recently, the Government's response to the Omnicron variant of Covid-19 demonstrates the level of uncertainty the Council is facing. The Council's draft budget proposals for 2022/23 recognise this risk and include a provision for reduced car demand with a financial impact of £250,000, an assumption of reduced demand of 9%. The proposals in this report also include a further contingency of £50,000.

- 6.2** The estimates used in this report are based upon experience of car park use and intelligence gained from a spot check carried out in August 2021. This modelling of additional income as a result of charging for car park use until 6 pm across the District has been compared to the income which would have been generated from demand in 2015/16, the last time the Council charged for this period. A prudent estimate has been made of the financial impact of the proposals.

- 6.3** There is a risk that an inflationary increase to prices could result in reduced demand for car parking. However, the previous price increase, which was implemented in September 2020, did not result in reduced demand.

## **7. EQUALITIES IMPACT**

- 7.1** No impact on any specific groups has been identified. Vehicles displaying a valid blue badge are able to park for free in all the Council's car parks.

## **8. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**



- 8.1 Removing the 4 hour tariff in the Forum car park and introducing the 3 hour tariff in the West street car park will result in an increase in vehicle turnover. This will help the reduction in carbon emissions as there will be a reduction in vehicles circling and idling within the car parks waiting for vacant parking bays.

9. **ALTERNATIVE OPTIONS**

- 9.1 Cabinet can consider an alternative inflationary fee increase, to charge for evenings or Sundays in some or all car parks.

(END)

## Annex A

Current Parking Charges as at April 2021.

Location	½ hour	1 hour	2 hours	3 hours	4 hours	5 hours	10 hours	Sunday	Free after 3pm
Brewery – Cirencester	70p	£1.60	£2.80	£3.70				No	Yes
Forum - Cirencester	70p	£1.60	£2.80	£3.70	£4.50			No	Yes
Cotswold Leisure Centre-Cirencester	70p	£1.60	£2.80	£3.70				No	
Abbey - Cirencester	70p	£1.60	£2.80	£3.70		£5.00	£7.50	No	
Old Station - Cirencester	70p	£1.60	£2.80	£3.70		£5.00	£7.50	No	
Waterloo - Cirencester	70p	£1.60	£2.80	£3.70		£5.00	£7.50	No	
Sheep Street - Cirencester	70p	£1.60	£2.80	£3.70		£5.00	£7.50	No	
*Beeches - Cirencester	70p	£1.60					£2.50	No	
Church Street - Tetbury	60p	90p	£1.80	£2.00				No	Yes
West Street - Tetbury	60p	90p	£1.80				£2.50	No	Yes
Old Market Way –Moreton in Marsh	60p	90p	£1.80				£2.50	No	Yes
Maugersbury Rd – Stow on the Wold	70p	£1.60	£2.80	£3.70		£4.70	£7.80	10am – 4pm	Yes
Rissington Road – Bourton on the Water			£3.30	£4.20		£5.20	£8.30	10am-6pm	

\*Beeches –Cirencester A maximum of 6 days may be purchased in advance at £2.50 per day.

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## Annex B

### Proposed Parking Charges

Location	½ hour	1 hour	2 hours	3 hours	4 hours	5 hours	10 hours	Sunday	Free after 3pm
Brewery – Cirencester	80p	£1.70	£3.00	£3.90				No	No
Forum - Cirencester	80p	£1.70	£3.00	£3.90				No	No
Cotswold Leisure Centre-Cirencester	80p	£1.70	£3.00	£3.90				No	
Abbey - Cirencester	80p	£1.70	£3.00	£3.90		£5.30	£7.90	No	
Old Station - Cirencester	80p	£1.70	£3.00	£3.90		£5.30	£7.90	No	
Waterloo - Cirencester	80p	£1.70	£3.00	£3.90		£5.30	£7.90	No	
Sheep Street - Cirencester	80p	£1.70	£3.00	£3.90		£5.30	£7.90	No	
*Beeches - Cirencester	80p	£1.70					£2.70	No	
Church Street - Tetbury	70p	£1.10	£2.10	£2.90				No	No
West Street - Tetbury	70p	£1.10	£2.10	£2.90			£3.50	No	No
Old Market Way –Moreton in Marsh	70p	£1.00	£1.90				£2.70	No	No
Maugersbury Rd – Stow on the Wold	80p	£1.70	£3.00	£3.90		£4.30	£7.90	10am – 4pm	No
Rissington Road – Bourton on the Water			£3.50	£4.50		£5.50	£8.80	10am-6pm	

\*Beeches –Cirencester A maximum of 6 days may be purchased in advance at £2.70 per day.

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## Annex C

### Current Season Ticket Charges

	1 year	6 months	3 months	Which location
Off- Peak PLUS - 8am to 10am and 4pm to 6pm plus Saturdays and Sundays. All car parks district wide (not valid in Market Place Cirencester, Market Square Chipping Campden or The Chipping, Tetbury)	£60.00	N/A	N/A	Council owned car parks district wide
Off-Peak - 8am to 10am and 4pm to 6pm. All car parks district wide (not valid in Market Place Cirencester, Market Square Chipping Campden or The Chipping, Tetbury)	£44.00	N/A	N/A	Council owned car parks district wide
Powells School permit, Abbey Grounds or Waterloo car parks from 8:30 to 9am and 3pm to 3:40pm Mon to Fri	£44.00	N/A	N/A	Abbey or Waterloo Car Parks Cirencester
Nursery school permit, Sheep Street or Old Station car parks from 8:45 to 9:15, 3:15 to 3:45 and 5:15 to 5:45 Mon to Fri	£44.00	N/A	N/A	Sheep St or Old Station car parks Cirencester
Whiteway –Cirencester- 10 Hr	£550.00	N/A	N/A	Guaranteed space Mon to Fri
Abbey –Cirencester- 10 Hr	£550.00	£285	£150	Abbey only
Sheep St –Cirencester- 10 Hr	£550.00	£285	£150	Sheep St only
Old Station –Cirencester- 10 Hr	£550.00	£285	£150	Old Station only
Waterloo – Cirencester 10 Hr	£550.00	£285	£150	Waterloo Only
West Street – Tetbury -10 Hr	£400.00	£210	£110	West Street Only
Maugersbury Rd–Stow on the Wold- 10 Hr	£400.00	£210	£110	Maugersbury Rd only
Rissington Rd–Bourton on the Water – 10 Hr	£400.00	£210	£110	Rissington Rd only
Old Market Way - Moreton in Marsh – 10 Hr	£400.00	£210	£110	Old Market Way only

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## Annex D

### Proposed Season Ticket Charges.

	1 year	6 months	3 months	Which location
Off- Peak PLUS - 8am to 10am and 4pm to 6pm plus Saturdays and Sundays. All car parks district wide (not valid in Market Square Chipping Campden or The Chipping, Tetbury)	£75.00	N/A	N/A	Council owned car parks district wide
Off-Peak - 8am to 10am and 4pm to 6pm. All car parks district wide (not valid in Market Place Cirencester, Market Square Chipping Campden or The Chipping, Tetbury)	£55.00	N/A	N/A	Council owned car parks district wide
Powells School permit, Abbey Grounds or Waterloo car parks from 8:30 to 9am and 3pm to 3:40pm Mon to Fri	£48.00	N/A	N/A	Abbey or Waterloo Car Parks Cirencester
Whiteway –Cirencester- 10 Hr	£500	£250	£125	Guaranteed space Mon to Fri
Abbey –Cirencester- 10 Hr	£650	£325	£150	Abbey only
Sheep St –Cirencester- 10 Hr	£600	£300	£150	Sheep St only
Old Station –Cirencester- 10 Hr	£600	£300	£150	Old Station only
Waterloo – Cirencester 10 Hr	£600	£300	£150	Waterloo Only
West Street – Tetbury -10 Hr	£435	£220	£120	West Street Only
Maugersbury Rd–Stow on the Wold- 10 Hr	£435	£220	£120	Maugersbury Rd only
Rissington Rd–Bourton on the Water – 10 Hr	£435	£220	£120	Rissington Rd only
Old Market Way - Moreton in Marsh – 10 Hr	£435	£220	£120	Old Market Way only

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Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET – 10 JANUARY 2022
Report Number	AGENDA ITEM 10
Subject	EXTERNAL AUDIT CONTRACT
Wards affected	N/A
Accountable member	Cllr Mike Every, Deputy Leader and Cabinet Member for Finance Email: <a href="mailto:mike.every@cotswold.gov.uk">mike.every@cotswold.gov.uk</a>
Accountable officer	Jenny Poole, Chief Finance Officer Email: <a href="mailto:jenny.poole@cotswold.gov.uk">jenny.poole@cotswold.gov.uk</a>
Summary/Purpose	To consider the options for procuring the Council’s external audit services for the period from 2023/24 and to make a recommendation to the Council.
Annexes	Annex A – Public Sector Audit Appointments Ltd Prospectus
Recommendation(s)	<p>a) <i>That Cabinet considers the options for procuring the Council’s external audit service for the period from 2023/24; and</i></p> <p>b) <i>Recommends to Council procurement through the National Procurement Framework using Public Sector Audit Appointments Ltd.</i></p>
Corporate priorities	Ensure that all services delivered by the Council are delivered to the highest standard.
Key Decision	NO
Exempt	NO
Consultees/ Consultation	The Audit Committee considered the options on 21 October 2021 and supported procurement using the National Procurement Framework through PSAA Ltd.



## 1. BACKGROUND

- 1.1 The process for re-tendering for External Audit in Local Authorities in England, for contracts due to start from 2023/24, is now underway and the Council will need to decide whether to procure its own External Auditor or opt into the National Procurement Framework.
- 1.2 Legislation requires a resolution of Council if a Local Authority wishes to opt into the National arrangement. The deadline for this decision is the 11 March 2022. If the Council doesn't make such a decision, the legislation assumes that the Council will procure its own External Audit Service.
- 1.3 The last time that Council was required to make this choice was in 2016/17. Since then a lack of capacity in the Audit market has been exacerbated by increased requirements placed on External Auditors by the Audit Regulator. There is also a limited number of firms in the market and too few qualified auditors employed by those firms. Nationally, this has led to a situation where many audits have been delayed and dozens of audit opinions remain outstanding from 2019/20 and 2020/21. Auditors have also been asking for additional fees to pay for extra work.
- 1.4 As the client in the contract, a Council has little influence over what it is procuring. The nature and scope of the Audit is determined by Codes of Practice and Guidance and the regulation of the audit market is undertaken by a third party, currently the Financial Reporting Council. Essentially, Councils find themselves operating in what amounts to a suppliers' market.
- 1.5 The supply side of the market needs to be expanded, which includes encouraging bids from challenger firms. Public Sector Audit Appointments Ltd (PSAA), the body nominated by the Government to run the national arrangements, has suggested various ways this could be done, but these initiatives are much more likely to be successful if a large number of councils sign up to the national scheme.
- 1.6 A council procuring its own Auditor or procuring through a Joint Arrangement needs to set up an Audit Panel with an independent Chair to oversee the procurement and running of the contract. The procurement process and contract management present an administrative burden to the Council, which is currently performed by PSAA. The number of potential suppliers is limited to the small pool of registered firms with accredited Key Audit Partners (KAP).



- 1.7 PSAA has now built up considerable expertise and has been working hard to address the issue that has arisen with the Contracts over recent years.
- 1.8 PSAA has commissioned high quality research to understand the nature of the Audit market and has worked very closely with the Ministry for Housing Communities and Local Government (MHCLG), now the Department for Levelling Up, Homes and Communities (DLUHC) to enable the Government to consult on changes to the fee setting arrangements to deal better with variations at national and local level.

## 2. MAIN POINTS

- 2.1 The PSAA Prospectus is included at **Annex A** and includes a proposed timescale for the procurement which commences in February 2022 and awards Contracts in August 2022. Subject to consultations with opted-in bodies and Audit firms, the plan is to make Auditor appointments by 31 December 2022 (as required by the Regulations).
- 2.2 PSAA's preferred option for the length of the Contract is 5 years.

## 3. FINANCIAL IMPLICATIONS

- 3.1 Audit fees are rising in all sectors in response to increased regulatory requirements for Audit quality and changes in Audit scope and Technical Standards. PSAA will consult each year on the fee scale and will consult in 2023 on the 2023/24 fee scale.
- 3.2 Fee variations would continue to apply where the local circumstances of an audited body require additional audit work that was not expected at the time the fee scale was set. Current local Audit Regulations allow PSAA to approve fee variation requests only at individual bodies, for additional audit requirements that become apparent during the course of an audit year. MHCLG has announced the intention to amend the Regulations, following a consultation, to provide more flexibility. This would include the ability for PSAA to approve standardised fee variations to apply to all or groupings of bodies where it may be possible to determine additional fees for some new requirements nationally rather than for each opted-in body individually. Where it is possible to do this, it would have the effect of reducing the need for local fee variations.

## 4. LEGAL IMPLICATIONS

- 4.1 Public Sector Audit Appointments Limited (PSAA) is an independent company limited by guarantee incorporated by the Local Government Association in August 2014. In July 2016, the Secretary of State specified PSAA as an appointing person for principal



Local Government and police bodies for audits from 2018/19, under the provisions of the Local Audit and Accountability Act 2014 and the Local Audit (Appointing Person) Regulations 2015. Acting in accordance with this role PSAA is responsible for appointing Auditors and setting scales of fees for relevant principal Authorities that have chosen to opt into its national scheme, overseeing issues of Auditor independence and monitoring compliance by the Auditor with the contracts.

## **5. RISK ASSESSMENT**

- 5.1** The key risks relate to the market for External Audit provision which are set out in the main body of the Report at paragraphs 1.4 to 1.6. Should the Council decide to procure its External Audit services outside of the PSAA route, there are risks of failing to procure a suitable Audit partner and the costs of the Contract being higher as there is a failure to achieve economies of scale.

## **6. ALTERNATIVE OPTIONS**

- 6.1** The Council's Chief Finance Officer is proposing that procurement is commissioned through PSAA. The alternative option is for the Council to procure its own Contract for External Audit services. This option lacks the benefits of economies of scale offered by the PSAA route and crystallises the risks in the External Audit market as set out in paragraphs 1.4 to 1.6.

## **7. BACKGROUND PAPERS**

- 7.1** None

(END)

# PROSPECTUS

## The national scheme for local auditor appointments

All eligible bodies

September 2021

[www.psaa.co.uk](http://www.psaa.co.uk)

## About PSAA

Public Sector Audit Appointments Limited (PSAA) is an independent company limited by guarantee incorporated by the Local Government Association in August 2014.

In July 2016, the Secretary of State specified PSAA as an appointing person for principal local government and police bodies for audits from 2018/19, under the provisions of the Local Audit and Accountability Act 2014 and the Local Audit (Appointing Person) Regulations 2015. Acting in accordance with this role PSAA is responsible for appointing auditors and setting scales of fees for relevant principal authorities that have chosen to opt into its national scheme, overseeing issues of auditor independence and monitoring compliance by the auditor with the contracts we enter into with the audit firms.

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## Introduction

PSAA has issued its formal invitation to all eligible bodies to opt into the national scheme for local auditor appointments for the second appointing period, which will provide external audit arrangements for the period commencing from the financial year 2023/24.

This prospectus is published to provide details of the national scheme and to assist eligible bodies in deciding whether or not to accept PSAA's invitation. The scheme has been shaped by [your feedback to the June 2021 consultation](#) on our draft prospectus. The key areas of our approach that have been refined in response to consultation feedback are set out later in this prospectus.

In relation to appointing auditors, eligible bodies have options to arrange their own procurement and make the appointment themselves or in conjunction with other bodies, or they can join and take advantage of the national collective scheme administered by PSAA.

A decision to become an opted-in authority must be taken in accordance with the Regulations, that is by the members of an authority meeting as a whole, i.e. in Full Council, except where the authority is a corporation sole, such as a police and crime commissioner, in which case this decision must be taken by the holder of that office.

An eligible body that has decided to join the scheme must inform PSAA by returning the Form of Acceptance Notice (issued with the opt-in invitation) **no later than midnight on Friday 11 March 2022**.

An eligible body that does not accept the opt-in invitation but subsequently wishes to join the scheme may apply to opt in only after the appointing period has commenced, that is on or after 1 April 2023. In accordance with the regulations, as the appointing person, PSAA must: consider a request to join its scheme; agree to the request unless it has reasonable grounds for refusing it; and notify the eligible body within four weeks of its decision with an explanation if the request is refused. Where the request is accepted, PSAA may recover its reasonable costs for making arrangements to appoint a local auditor from the opted-in body.

## Audit does matter

The purpose of audit is to provide an independent opinion on the truth and fairness of the financial statements, whether they have been properly prepared and to report on certain other requirements. In relation to local audit the auditor has a number of distinctive duties including assessing the arrangements in place to deliver value for money, and dealing with electors' objections and issuing public interest reports.

Good quality independent audit is one of the cornerstones of public accountability. It gives assurance that taxpayers' money has been well managed and properly expended. It helps to inspire trust and confidence in the organisations and people responsible for managing public money.

*“The LGA set up PSAA to provide a way for councils to meet the legislative requirements of audit procurement without unnecessary bureaucracy and to provide leverage for councils by collaborating in a difficult market. It is now more important than ever that councils work together to ensure we get what we need from the audit market.”*

*James Jamieson. Chairman of the Local Government Association*

## Context: changes in the audit market

In 2014 when the Local Audit and Accountability Act received Royal Assent the audit market was relatively stable. In 2017 PSAA benefitted from that continuing stability. Our initial procurement on behalf of more than 480 bodies (98% of those eligible to join the national scheme) was very successful, attracting very competitive bids from firms. As a result, we were able to enter into long term contracts with five experienced and respected firms and to make auditor appointments to all bodies. However, although we did not know it at the time, this was the calm before the storm.

2018 proved to be a very significant turning point for the audit industry. A series of financial crises and failures in the private sector gave rise to questioning about the role of auditors and the focus and value of their work. In rapid succession the Government commissioned four independent reviews, all of which have subsequently reported:

- Sir John Kingman's review of the Financial Reporting Council (FRC), the audit regulator;
- the Competition and Markets Authority review of the audit market;
- Sir Donald Brydon's review of the quality and effectiveness of audit; and
- Sir Tony Redmond's review of local authority financial reporting and external audit.

In total the four reviews set out more than 170 recommendations which are now at various stages of consideration by Government with the clear implication that a series of significant reforms could follow. Indeed, in some cases where new legislation is not required, significant change is already underway. A particular case in point concerns the FRC, where the Kingman Review has inspired an urgent drive to deliver rapid, measurable improvements in audit quality. This has already created a major pressure for firms and an imperative to ensure full compliance with regulatory requirements and expectations in every audit they undertake.

By the time firms were conducting 2018/19 local audits, the measures which they were putting in place were clearly visible in response to a more focused regulator that was determined to achieve change. In order to deliver the necessary improvements in audit quality, firms were requiring their audit teams to undertake additional work to gain higher levels of assurance. However, additional work requires more time, posing a threat to firms' ability to complete all of their audits by the target date for publication of audited accounts (then 31 July) - a threat accentuated by growing recruitment and retention challenges, the complexity of local government financial statements, and increasing levels of technical challenges as bodies explored innovative ways of developing new or enhanced income streams to help fund services for local people.

This risk to the delivery of timely audit opinions first emerged in April 2019 when one of PSAA's contracted firms flagged the possible delayed completion of approximately 20 audits. Less than four months later, all firms were reporting similar difficulties, resulting in more than 200 delayed audit opinions.

2019/20 audits have presented even greater challenges. With Covid-19 in the mix both finance and audit teams have found themselves in uncharted waters. Even with the benefit of an extended timetable targeting publication of audited accounts by 30 November, more than 260 opinions remained outstanding. The timeliness problem is extremely troubling. It creates disruption and reputational damage for affected parties. There are no easy solutions, and so it is vital that co-ordinated action is taken across the system by all involved in the accounts and audit process to address the current position and achieve sustainable improvement without compromising audit quality. PSAA is fully committed to do all it can to contribute to achieving that goal.

Delayed opinions are not the only consequence of the regulatory drive to improve audit quality. Additional audit work must also be paid for. As a result, many more fee variation claims have been received than in prior years and audit costs have increased.

None of these problems are unique to local government audit. Similar challenges have played out throughout other sectors where, for example, increased fees and disappointing responses to tender invitations have been experienced during the past two years.

All of this paints a picture of an audit industry under enormous pressure, and of a local audit system which is experiencing its share of the strain and instability as impacts cascade down to the frontline of individual audits. We highlight some of the initiatives which we have taken to try to manage through this troubled post-2018 audit era in this prospectus.

We look forward to the challenge of getting beyond managing serial problems within a fragile system and working with other local audit stakeholders to help design and implement a system which is more stable, more resilient, and more sustainable.

## Responding to the post-2018 pressures

MHCLG's<sup>1</sup> Spring statement proposes changes to the current arrangements. At the time of writing, a formal consultation on the proposals in the Spring statement is underway and is due to close on 22 September 2021. The significant work to reform audit in the wake of the four independent reviews is underway. Further wide-ranging change is almost certain to occur during the next few years, and is very likely to have an impact during the appointing period that will commence in April 2023. Organisations attempting to procure audit services of an appropriate quality during this period are likely to experience markedly greater challenges than pre-2018.

Local government audit will not be immune from these difficulties. However, we do believe that PSAA's national scheme will be the best option to enable local bodies to secure audit services in a very challenging market. Firms are more likely to make positive decisions to bid for larger, long term contracts, offering secure income streams, than they are to invest in bidding for a multitude of individual opportunities.

We believe that the national scheme already offers a range of benefits for its members:

- transparent and independent auditor appointment via a third party;
- the best opportunity to secure the appointment of a qualified, registered auditor;
- appointment, if possible, of the same auditors to bodies involved in significant collaboration/joint working initiatives, if the parties believe that it will enhance efficiency and value for money;
- on-going management of any independence issues which may arise;
- access to a dedicated team with significant experience of working within the context of the relevant regulations to appoint auditors, managing contracts with audit firms, and setting and determining audit fees;
- a value for money offer based on minimising PSAA costs and distribution of any surpluses to scheme members;
- collective savings for the sector through undertaking one major procurement as opposed to a multiplicity of smaller procurements;
- a sector-led collaborative scheme supported by an established advisory panel of sector representatives to help inform the design and operation of the scheme;

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<sup>1</sup> Immediately prior to the publication of this document it was announced that MHCLG has been renamed to Department for Levelling Up, Housing and Communities (DLUHC). The document refers to the department as MHCLG.

- avoiding the necessity for local bodies to establish an auditor panel and undertake an auditor procurement, enabling time and resources to be deployed on other pressing priorities;
- providing regular updates to Section 151 officers on a range of local audit related matters and our work, to inform and support effective auditor-audited body relationships; and
- concerted efforts to develop a more sustainable local audit market.

The national scheme from 2023/24 will build on the current scheme having listened to the feedback from scheme members, suppliers and other stakeholders and learning from the collective post-2018 experience.

Since 2018 we have taken a number of initiatives to improve the operation of the scheme for the benefit of all parties including:

- commissioning an independent review undertaken by Cardiff Business School of the design of the scheme and implementation of our appointing person role to help shape our thinking about future arrangements;
- commissioning an independent review by consultancy firm Touchstone Renard of the sustainability of the local government audit market, which identified a number of distinctive challenges in the current local audit market. We published the report to inform debate and support ongoing work to strengthen the system and help to deliver long term sustainability;
- proactively and constructively engaging with the various independent reviews, including the significant Redmond Review into Local Authority Financial Reporting and External Audit;
- working with MHCLG to identify ways to address concerns about fees by developing a new approach to fee variations which would seek wherever possible to determine additional fees at a national level where changes in audit work apply to all or most opted-in bodies;
- establishing the Local Audit Quality Forum, which has to date held five well attended events on relevant topics, to strengthen engagement with Audit Committee Chairs and Chief Finance Officers;
- using our advisory panel and attending meetings of the various Treasurers' Societies and S151 officer meetings to share updates on our work, discuss audit-related developments, and listen to feedback;
- maintaining contact with those registered audit firms that are not currently contracted with us, to build relationships and understand their thinking on working within the local audit market;
- undertaking research to enable a better understanding of the outcomes of electors' objections and statements of reasons issued since our establishment in April 2015; and
- sharing our experiences with and learning from other organisations that commission local audit services such as Audit Scotland, the NAO, and Crown Commercial Services.

As a member of the newly formed Local Audit Liaison Committee (established by MHCLG as outlined in its Spring statement), we are working closely with a range of local audit stakeholders including MHCLG, FRC, NAO, ICAEW, CIPFA and the LGA to help identify and develop further initiatives to strengthen local audit. In many cases desirable improvements are not within PSAA's sole gift and, accordingly, it is essential that this work is undertaken collaboratively with a common aim to ensure that local bodies continue to be served by an audit market which is able to meet the sector's needs and which is attractive to a range of well-equipped suppliers.

One of PSAA's most important obligations is to make an appropriate auditor appointment to each and every opted-in body. Prior to making appointments for the second appointing period, commencing on 1 April 2023, we plan to undertake a major procurement enabling suppliers to enter into new long term contracts with PSAA.

In the event that the procurement fails to attract sufficient capacity to enable auditor appointments to every opted-in body or realistic market prices, we have fallback options to extend one or more existing contracts for 2023/24 and also 2024/25.

We are very conscious of the value represented by these contract extension options, particularly given the current challenging market conditions. However, rather than simply extending existing contracts for two years (with significant uncertainty attaching to the likely success of a further procurement to take effect from 1 April 2025), we believe that it is preferable, if possible, to enter into new long term contracts with suppliers at realistic market prices to coincide with the commencement of the next appointing period.

MHCLG has recently undertaken a consultation proposing amendments to the Appointing Person Regulations. We have set the length of the next compulsory appointing period to cover the audits of the five consecutive financial years commencing 1 April 2023.

## **PSAA is well placed to lead the national scheme**

As outlined earlier, the past few years have posed unprecedented challenges for the UK audit market. Alongside other stakeholders PSAA has learned a great deal as we have tried to address the difficulties and problems arising and mitigate risks. It has been a steep learning curve but nevertheless one which places us in a strong position to continue to lead the national scheme going forward. MHCLG's Spring statement confirmed Government's confidence in us to continue as appointing person, citing our strong technical expertise and the proactive work we have done to help to identify improvements that can be made to the process.

The company is staffed by a team with significant experience of working within the context of the regulations to appoint auditors, managing contracts with audit firms, and setting and determining audit fees. All of these roles are undertaken with a detailed, ongoing, and up-to-date understanding of the distinctive context and challenges facing

both the sector and a highly regulated service and profession which is subject to dynamic pressures for change. Where appropriate we have worked with MHCLG to change our regulations where they are preventing efficiency.

We believe that the national collective, sector-led scheme stands out as the best option for all eligible bodies - especially in the current challenging market conditions. It offers excellent value for money and assures the independence of the auditor appointment.

Membership of the scheme will save time and resources for local bodies - time and resources which can be deployed to address other pressing priorities. Bodies can avoid the necessity to establish an auditor panel (required by the Local Audit & Accountability Act, 2014) and the need to manage their own auditor procurement. Assuming a high level of participation, the scheme can make a significant contribution to supporting market sustainability and encouraging realistic prices in a challenging market.

The scope of a local audit is fixed. It is determined by the Code of Audit Practice (currently published by the NAO<sup>2</sup>), the format of the financial statements (specified by CIPFA/LASAAC) and the application of auditing standards regulated by the FRC. These factors apply to all local audits irrespective of whether an eligible body decides to opt into PSAA's national scheme or chooses to make its own separate arrangements.

The scope of public audit is wider than for private sector organisations. For example, for 2020/21 onwards it involves providing a new commentary on the body's arrangements for securing value for money, as well as dealing with electors' enquiries and objections, and in some circumstances issuing public interest reports.

Auditors must be independent of the bodies they audit to enable them to carry out their work with objectivity and credibility, and to do so in a way that commands public confidence. We will continue to make every effort to ensure that auditors meet the relevant independence criteria at the point at which they are appointed, and to address any identified threats to independence which arise from time to time. We will also monitor any significant proposals for auditors to carry out consultancy or other non-audit work with the aim of ensuring that these do not undermine independence and public confidence.

The scheme will also endeavour to appoint the same auditor to bodies involved in formal collaboration/joint working initiatives, if the parties consider that a common auditor will enhance efficiency and value for money.

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<sup>2</sup> MHCLG's Spring statement proposes that overarching responsibility for the Code will in due course transfer to the system leader, namely ARGA, the new regulator being established to replace the FRC.

## PSAA's commitments

### PSAA will contract with appropriately qualified suppliers

In accordance with the 2014 Act, audit firms must be registered with one of the chartered accountancy institutes - currently the Institute of Chartered Accountants in England and Wales (ICAEW) - acting in the capacity of a Recognised Supervisory Body (RSB). The quality of their work will then be subject to inspection by either or potentially both the RSB and the FRC. Currently there are fewer than ten firms registered to carry out local audit work.

We will take a close interest in the results of RSB and FRC inspections and the subsequent plans that firms develop to address any areas in which inspectors highlight the need for improvement. We will also focus on the rigour and effectiveness of firms' own internal quality assurance arrangements, recognising that these represent some of the earliest and most important safety nets for identifying and remedying any problems arising. To help inform our scrutiny of both external inspections and internal quality assurance processes, we will invite regular feedback from both audit committee chairs and chief finance officers of audited bodies.

### PSAA will support market sustainability

We are very conscious that our next procurement will take place at a very difficult time given all of the fragility and uncertainties within the external audit market.

Throughout our work we will be alert to new and relevant developments that may emerge from the Government's response to the Kingman, CMA and Brydon Reviews, as well as its response to the issues relating specifically to local audit highlighted by the Redmond Review. We will adjust or tailor our approach as necessary to maximise the achievement of our procurement objectives.

A top priority must be to encourage market sustainability. Firms will be able to bid for a variety of differently sized contracts so that they can match their available resources and risk appetite to the contract for which they bid. They will be required to meet appropriate quality standards and to reflect realistic market prices in their tenders, informed by the scale fees and the supporting information provided about each audit. Where regulatory changes are in train which affect the amount of audit work which suppliers must undertake, firms will be informed as to which developments should be priced into their bids. Other regulatory changes will be addressed through the fee variation process, where appropriate in the form of national variations.

### PSAA will offer value for money

Audit fees must ultimately be met by individual audited bodies. The prices submitted by bidders through the procurement will be the key determinant of the value of audit fees paid by opted-in bodies.

We believe that the most likely way to secure competitive arrangements in a suppliers' market is to work collectively together as a sector.

We will seek to encourage realistic fee levels and to benefit from the economies of scale associated with procuring on behalf of a significant number of bodies. We will also continue to seek to minimise our own costs (which represent approximately 4% of overall scheme costs). We are a not-for-profit company and any surplus funds will be returned to scheme members. For example, in 2019 we returned a total £3.5million to relevant bodies and, more recently, we announced a further distribution of £5.6m in August 2021.

We will continue to pool scheme costs and charge fees to opted-in bodies in accordance with our published fee scale as amended from time to time following consultations with scheme members and other interested parties. Pooling is a key tenet of the national collective scheme.

Additional fees (fee variations) are part of the statutory framework. They only occur if auditors are required to do substantially more work than anticipated, for example, if local circumstances or the Code of Audit Practice change or the regulator (the FRC) increases its requirement on auditors.

Audit developments since 2018 have focused considerable attention on audit fees. The drive to improve audit quality has created significant fee pressures as auditors have needed to extend their work to ensure compliance with increased regulatory requirements. Changes in audit scope and technical standards, such as the requirement in the new Code of Audit Practice 2020 for the auditor to provide a VFM arrangements commentary, have also had an impact. Fees are rising in response to the volume of additional audit work now required.

The outcome is awaited of MHCLG's recent consultation on changes to the regulations, designed to provide the appointing person with greater flexibility to allow a fee scale to be set during the audit year (rather than before it starts). If implemented, these changes will enable approved recurring fee variations to be baked into the scale fee at an earlier date so the scale fees are more accurate and the volume of fee variations is reduced.

It is important to emphasise that by opting into the national scheme you have the reassurance that we review and robustly assess each fee variation proposal in line with statutory requirements. We draw on our technical knowledge and extensive experience in order to assess each submission, comparing with similar submissions in respect of other bodies/auditors before reaching a decision.

## Procurement Strategy

Our [procurement strategy](#) sets out the detail and scope of the procurement to deliver contracts from which the auditor appointments will be made for eligible bodies that decide to accept the invitation to opt into PSAA's scheme.

Our primary aim is to secure the delivery of an audit service of the required quality for every opted-in body at a realistic market price and to support the drive towards a long term competitive and more sustainable market for local public audit services.

We expect to initiate a new procurement for audit services in February 2022 and, subject to a satisfactory outcome, to award contracts in August 2022. Subject to consultations with opted-in bodies and audit firms, we plan to make auditor appointments by 31 December 2022 (as required by the regulations).

## Response to consultation feedback

PSAA consulted with eligible bodies and other stakeholders on our draft prospectus for the national scheme for local auditor arrangements from April 2023, and with the audit services market on important features of its procurement strategy. The insight provided from both these important consultations has helped to shape the arrangements that PSAA will implement from 2023/24. Key areas are highlighted below.

### Evolution of the Local Audit Framework

The consultation responses highlight the need for system-wide change. In many areas it is not within PSAA's remit to effect the significant change required.

The newly formed Local Audit Liaison Committee (as outlined in MHCLG's Spring statement), has enabled PSAA to highlight the need for a range of actions to tackle the identified issues that are essential to support a more stable, more resilient, and more sustainable local audit system. Sometimes the actions can be taken by individual organisations, but more frequently responsibility lies collectively across the system. The Liaison Committee and its members are now taking actions forward, including:

- All stakeholders to communicate the importance of audit timeliness as a consistent message to audit firms;
- PSAA to work with the FRC to develop the approach to quality evaluation of tenders;
- MHCLG and other stakeholders to understand the extent of potential increased audit costs for all eligible bodies and to consider how these might be met;
- All stakeholders to consider ways in which to attract new entrants (firms and Key Audit Partners) into the market;
- Central government departments to provide clarity on the direction of local audit policy to inform firms' consideration ahead of next procurement;
- The NAO and FRC to work together to consider how they can provide clarity about the future direction of the Code of Audit Practice to firms ahead of the next procurement; and
- MHCLG, CIPFA and the LGA to consider how to support finance departments with accounting and audit requirements.

In the vast majority of the areas consulted on which were within PSAA's remit, responses were supportive of our proposals for the national scheme from 2023/24 which is very encouraging. Areas where we have revisited and evolved our approach are highlighted below.

## **Minimum Audit Fees**

Audit fees are rising in all sectors in response to increased regulatory requirements for audit quality and changes in audit scope and technical standards. Striving to ensure realistic fee levels is a vital prerequisite to achieving a more sustainable and stable local audit market.

Where individual audits currently attract scale fees that do not cover the basic costs of the audit work needed for a Code-compliant audit, we propose to implement a minimum fee level at the start of the next appointing period, for the audit of the 2023/24 accounts. Our independent research indicates a minimum fee level of £31,000 should apply, based on the 2020/21 scope of audit work, to any opted-in body (a police and crime commissioner and a chief constable constitute one body for this purpose).

We cannot anticipate scale fees for the next appointing period at this stage, because they will depend on the prices achieved in the procurement and any changes in audit requirements. Where any price increase means that the scale fee for a body does not reach the floor set by the minimum fee, the fee for that body would increase to reach the minimum level. It is likely, given current expectations, that the introduction of a minimum fee specifically would lead to an increase in fees for a relatively small number of local bodies. PSAA consults each year on the fee scale and will consult in 2023 on the 2023/24 fee scale.

Introducing a minimum fee is a one-off exercise designed to improve the accuracy of the fee scale for the next appointing period. Fee variations would continue to apply where the local circumstances of an audited body require additional audit work that was not expected at the time the fee scale was set.

## **Standardised fee variations**

Current local audit regulations allow PSAA to approve fee variation requests only at individual bodies, for additional audit requirements that become apparent during the course of an audit year. MHCLG has announced the intention to amend the regulations, following a consultation, to provide more flexibility. This would include the ability for PSAA to approve standardised fee variations to apply to all or groupings of bodies where it may be possible to determine additional fees for some new requirements nationally rather than for each opted-in body individually. Where it is possible to do this, it would have the effect of reducing the need for local fee variations.

## **Approach to social value in the evaluation of tenders**

We plan to retain our original proposal of a 5% weighting but to broaden the criteria by asking bidders to describe the additional social value they will deliver from the contract, which could include the creation of audit apprenticeships and meaningful training opportunities. Bidders will also be asked to describe how their delivery of social value will be measured and evidenced.

## Contract Management

The quality of the audit services received by opted-in bodies is very important to both the bodies themselves and to PSAA. Our intention is therefore to focus a significant majority of the quality assessment of tender submissions on resourcing, capacity and capability (including sector knowledge) and on client relationship management and communication. Correspondingly, we intend to apply a lesser weighting to those criteria that are regularly assessed by the regulator. We will seek the views of the regulator in developing the detail of our approach.

We will also review the contract terms used in 2017 ahead of the next procurement of audit services. In particular we will consider the potential to introduce enhanced performance management arrangements aligned to the greater emphasis on quality within the tender evaluation process. Any such revision must ensure continued compliance with the FRC's Ethical Standard which prevents audit fees from being "*calculated on a predetermined basis relating to the outcome or result of a transaction, or other event, or the result of the work performed*".

## Information and Communication

Following the success of the webinars held to support the recent consultation, PSAA will be running a series of webinars starting in October 2021. The webinars will provide eligible bodies with the opportunity to hear and ask questions about specific areas of scheme arrangements and PSAA's work, and our progress to prepare for the second appointing period. Details of the [webinar series](#) can be found on our website.

## Eligible Principal Bodies in England

The following bodies are eligible to join the proposed national scheme for appointment of auditors to local bodies:

- county councils
- metropolitan borough councils
- London borough councils
- unitary councils
- combined authorities
- passenger transport executives
- police and crime commissioners for a police area
- chief constables for an area
- national park authorities for a national park
- conservation boards
- fire and rescue authorities
- waste authorities
- the Greater London Authority and its functional bodies
- any smaller bodies whose expenditure in any year exceeds £6.5m (e.g. Internal Drainage Boards) or who have chosen to be a full audit authority (Regulation 8 of Local Audit (Smaller Authorities) Regulations 2015).

## Board Members

Steve Freer (Chairman)

Keith House

Caroline Gardner CBE

Marta Phillips OBE

Stephen Sellers

PSAA Board members bring a wealth of executive and non-executive experience to the company. Areas of particularly relevant expertise include public governance, management and leadership; local government and contract law; and public audit and financial management.

Further information about PSAA's Board can be found at <https://www.psaa.co.uk/about-us/who-we-are/board-members/>

## Senior Executive Team

Tony Crawley, Chief Executive

Sandy Parbhoo, Chief Finance Officer

Andrew Chappell, Senior Quality Manager

Julie Schofield, Senior Manager Business & Procurement

Within the PSAA senior executive team there is extensive and detailed knowledge and experience of public audit, developed through long standing careers either as auditors or in senior finance and business management roles in relevant organisations.

Further information about PSAA's senior team can be found at <https://www.psaa.co.uk/about-us/who-we-are/executive-team/>

# Annex - Procurement Options

## Our Preferred Option

A 5 year contract with the fallback of the right to extend one or more of the current contracts if there are insufficient or unaffordable bids.

## Other Options Considered and Rejected

### Option 1

Extending the existing contracts for 2 years and deferring the procurement. We want to secure 5 year contracts if we can because we believe this option is more attractive to the market.

### Option 2

A 5 year contract with a commitment not to extend the existing contracts. We need the back stop of the right to extend the existing contracts if there are insufficient bids to allow us to make auditor appointments to all opted in bodies or if any of the bids received propose unacceptable prices.

### Option 3

A 5 year contract with pre-determined prices for years 1 and 2 thereby avoiding the need for firms to price in the value of the right to extend the existing contracts. We believe such an arrangement will be unattractive to the market. Firms should be able to offer their own prices for years 1 and 2.



Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET – 10 JANUARY 2022
Report Number	AGENDA ITEM 11
Subject	REVIEW OF COUNCIL TAX DISCOUNTS
Wards affected	All
Accountable member	Cllr Mike Evely – Deputy Leader and Cabinet Member with responsibility for Finance Email: <a href="mailto:mike.evely@cotswold.gov.uk">mike.evely@cotswold.gov.uk</a>
Accountable officer	Mandy Fathers – Business Manager for Operations and Enabling Email: <a href="mailto:mandy.fathers@publicagroup.uk">mandy.fathers@publicagroup.uk</a>
Summary/Purpose	To consider amendments to discounts for domestic properties that are empty and unfurnished from 1 April 2022.
Annexes	Annex A – Modelling exercise/data Annex B – List of exemptions/discounts
Recommendation(s)	<i>That Cabinet:</i>  a) <i>Approve amendments to a Class C discount from 1 April 2022;</i> <i>and,</i> b) <i>That the discount be amended to 25% for a maximum of 6 months</i>
Corporate priorities	<ul style="list-style-type: none"> <li>● Delivering our services to the highest standards</li> </ul>
Key Decision	YES
Exempt	NO
Consultees/ Consultation	Leader and Deputy Leader, Chief Executive and Deputy Chief Executive, Monitoring Officer, Interim Head of Legal Services, Finance Business Partner, Group Manager, Director of Finance (Publica)



## **I. BACKGROUND**

- 1.1** On 1 April 2013, the Government abolished several national exemptions in respect of Council Tax to give councils budgetary flexibility and encourage local discretions. This gave the Council discretion to amend the following discounts:
- I. Class A (100% discount for 12 months) for properties undergoing major/structural works
  - II. Class C (100% discount for 6 months) for properties that were empty and unfurnished
- 1.2** From 1 April 2013 the Council approved a scheme which reduced a Class A from 100% for 12 months to 100% for 6 months, and a Class C from 100% for 6 months to nil percent.
- 1.3** Following this change the Council received numerous complaints in respect of the amended Class C discount, largely from landlords and commercial agents, but also from owner occupiers and tenants. The complainants generally stated that a reduction was acceptable; but that 0% was too low.
- 1.4** The feedback was carefully considered and a consultation forum was held with local landlords and agents which resulted in the Class C discount being amended from 1 April 2014 to provide a maximum of 100% discount for the first month and a 25% discount for the second month.

## **2. MAIN POINTS**

- 2.1** The Council has discretion to amend local discounts currently on offer, with limitations. Those limitations being that a Class A cannot extend over a 12 month period and a Class C cannot be extended over a 6 month period.
- 2.2** A modelling exercise has been undertaken on the basis of amending the Class C discount from 1 April 2022, to be in line with all other Gloucestershire local authorities which offer a 25% discount for a maximum of 6 months.
- 2.3** The rationale for this is:
- I. It reduces the financial burden on the Council and its major precepting authorities;
  - II. It aligns with the policy for all of the other Gloucestershire lower tier councils; and
  - III. In practice, the majority of discounts are applied during the first 2 months of a property becoming empty and unfurnished.



- 2.4** Consideration has been given about whether to offer a discount at all, but it is considered reasonable to offer a period of time to allow, for example, new purchasers to move into a property, and for landlords to find a new tenant. Often tenants, both in social and private lets, have a short overlap in tenancies when moving. By allowing a discount this would avoid these council taxpayers paying for the overlapping period on an unfurnished let as well as being liable for the full charge on any new property.
- 2.5** It should be noted that properties that are empty because the occupier has gone into care (Class E) or the owner is deceased (Class F) retain their 100% exemption as part of the national regulations. Additionally, where a property is empty and owned for a charitable purpose (including Housing Association voids), a 100% exemption for a maximum period of 6 months is applicable. A full list of other mandatory (and discretionary) exemptions/discounts is detailed within Annex B (attached)

### **3. FINANCIAL IMPLICATIONS**

- 3.1** A modelling exercise has been undertaken based on 2020/2021 data and is attached as Annex A to this report.
- 3.2** Based on this exercise, it shows that during the first month of a property being empty and unfurnished the Council administered 2,876 discounts of 100% over the various Council Tax bands, and 2,364 discounts of 25%. The total cost for these discounts was £535,590 of which £64,057 is the Council's charge (11.95%).
- 3.3** Using the same data to estimate costs if the discount were to change to 25% for a maximum of 6 months would be as following:

Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Total Cost	Cost to CDC
2,876	2,364	433	205	184	358	£246,336	£29,462

\*\* It should be noted that the number of empty properties may be higher than previous months due to rolling over from one financial year to the other.

- 3.4** Changing the Class C discount to 25% for a maximum of six months would therefore increase Council Tax income by £289,254, this Council's share being £34,596.



#### **4. LEGAL IMPLICATIONS**

- 4.1 The Local Government Finance Act 2012 set out the powers to determine further discounts for certain dwellings. Detailed provisions are set out in the Council Tax (Exempt Dwellings) (England) (Amendment) Order 2012, SI 2012/2965 and the Council Tax (Prescribed Classes of Dwellings) (England) (Amendment) Regulations 2012, SI 2012/2964.

#### **5. RISK ASSESSMENT**

- 5.1 As 2022/23 will be the tenth year of operating a local Council Tax discount scheme for unoccupied domestic dwellings, there are no significant operational risks associated with the recommendations.

#### **6. EQUALITIES IMPACT**

- 6.1 There are no unacceptable adverse effects on the protected characteristics covered by the Equalities Act that have been identified

#### **7. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

- 7.1 None

#### **8. ALTERNATIVE OPTIONS**

- 8.1 As this is a discretionary scheme there are several alternative options that members may want to consider as follows:
- I. Reduce the period of discount to 1,2,3,4 or 5 months
  - II. Reduce the discount to zero percent. This would not be recommended due to the reasons given in para 1.2 to 1.4 above.
  - III. Apply discounts only to certain groups, such as those with overlapping tenancies, for a limited period of up to one month.

(END)

**CURRENT SCHEME OF 100% FOR MONTH 1 AND 25% FOR MONTH 2 - using 2020/21 data**

COUNCIL TAX BAND	MONTH 1	TOTAL COST	MONTH 2	TOTAL COST	MONTH 3	TOTAL COST	MONTH 4	TOTAL COST	MONTH 5	TOTAL COST	MONTH 6	TOTAL COST
A	338	34,121	203	5,123	41	0	27	0	18	0	37	0
B	421	49,585	277	8,156	69	0	30	0	34	0	41	0
C	744	100,142	981	33,011	112	0	51	0	56	0	107	0
D	574	86,921	349	13,212	86	0	34	0	34	0	67	0
E	364	67,369	257	11,891	60	0	26	0	17	0	50	0
F	253	55,339	157	8,585	42	0	15	0	11	0	27	0
G	161	40,633	120	7,571	20	0	22	0	11	0	25	0
H	21	12,417	20	1,514	3	0	0	0	3	0	4	0
		<u>446,527</u>		<u>89,063</u>		<u>0</u>		<u>0</u>		<u>0</u>		<u>0</u>

Total Cost: £535,590  
**CDC Cost £64,057**

**PROPOSED SCHEME OF 25% FOR A MAXIMUM PERIOD OF SIX MONTHS - using 2020/21 data**

COUNCIL TAX BAND	MONTH 1	TOTAL COST	MONTH 2	TOTAL COST	MONTH 3	TOTAL COST	MONTH 4	TOTAL COST	MONTH 5	TOTAL COST	MONTH 6	TOTAL COST
A	338	£8,530	203	5,123	41	1,035	27	681	18	454	37	934
B	421	12,396	277	8,156	69	2,032	30	883	34	1,001	41	1,207
C	744	25,036	981	33,011	112	3,769	51	1,716	56	1,884	107	3,601
D	574	21,730	349	13,212	86	3,256	34	1,287	34	1,287	67	2,536
E	364	16,842	257	11,891	60	2,775	26	1,203	17	787	50	2,314
F	253	13,835	157	8,585	42	2,297	15	946	11	602	27	1,476
G	161	10,158	120	7,571	20	1,262	22	1,388	11	694	25	1,577
H	21	3,104	20	1,514	3	227	0	0	3	227	4	303
		<u>111,632</u>		<u>89,063</u>		<u>16,652</u>		<u>8,106</u>		<u>6,936</u>		<u>13,948</u>

Total cost £246,336  
**CDC Cost £29,462**

**Additional Income**  
 Total £289,254  
**CDC £34,596**

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Annex B

Current classes of discounts/exemptions

Type (unoccupied)	Summary	Period of discount/exemption	Mandatory	Discretionary
Class B	Unoccupied properties and owned by a charity	100% for maximum 6 months	Y	
Class D	Unoccupied due to person being in prison	Until release	Y	
Class E	Unoccupied due to person having gone to live in a hospital or care home	Until person returns home/or liability change	Y	
Class F	Council Tax payer deceased (leaving property unoccupied)	100% for up to 6 months after grant of probate	Y	
Class G	Occupation prohibited by law	100% until prohibition lifted	Y	
Class H	Unoccupied property being held for a minister of religion	100% until occupation	Y	
Class I	Person living elsewhere to receive personal care (leaving property empty)	100% until person returns or care ends	Y	
Class J	Person living elsewhere to provide personal care (leaving property empty)	100% until person returns or care ends	Y	
Class K	Property left empty by a student and where a student is the owner/tenant of the property and, when last occupied was the sole or main residence of the student and no one else other than students lived there	100% as long as the person remains a student	Y	
Class L	Unoccupied property where a Mortgage lender is in possession of property	100% until possession is relinquished or the property is sold	Y	

<b>Class Q</b>	Property left empty by a bankrupt person	100% until change in liability	Y	
<b>Class R</b>	Unoccupied caravan pitch or boat mooring	100% until occupied	Y	
<b>Class T</b>	Unoccupied separately banded property forming part of another property or situated within the curtilage of another property which cannot be let separately without a breach of the Town and County Planning Act	100% until occupied	Y	
<b>Type (occupied)</b>	<b>Summary</b>	<b>Period of discount/exemption</b>	<b>Mandatory</b>	<b>Discretionary</b>
<b>Class M</b>	Students' Halls of Residence	100%	Y	
<b>Class N</b>	Property occupied only by students	100%	Y	
<b>Class O</b>	UK Armed Forces accommodation	100%	Y	
<b>Class P</b>	Occupied visiting forces accommodation	100%	Y	
<b>Class S</b>	Property occupied by persons under 18 years of ages	100%	Y	
<b>Class U</b>	Property occupied only by severely mentally impaired person(s). This does not apply to residential homes	100%	Y	
<b>Class V</b>	Main residence of a person with diplomatic privilege or immunity	100%	Y	
<b>Class W</b>	Occupied annex to an occupied property. Exemption applies if the annex forms part of a single property including at least one other dwelling and is the sole or main resident of a dependent relative (i.e someone over 65 years of age, or a person who is either severely mentally impaired or substantially and permanently disabled) of a person who is resident in that other dwelling.	100%	Y	

Type	Summary	Period of discount/exemption	Mandatory	Discretionary
<b>Class C</b>	Property is unoccupied and unfurnished	100% for month one and 25% for month two		Y
<b>Class A</b>	Unoccupied and unfurnished property where major repair work is required to make it habitable or structural alterations are happening	100% for up to 6 months		Y
<b>Annex Discount</b>	Annex occupied by a relative of a council tax payer of the main property or where it is used as part of the main property	50%	Y	
<b>Care Leavers</b>	Formerly a child in the care of Gloucestershire County Council and aged between 18 – 21 years of age and in occupation of a property where they are liable for Council Tax	100% if sole occupant up to 22 years of age or 50% if in joint occupation with others		Y
<b>Service Personnel and Job Related Discount</b>	Any dwelling provided as a second home to a person as part of his/her employment; and dwellings owned as second homes by people who are required by their employment to occupy another dwelling	Period of absence 50% Mandatory 50% Discretionary	Y	Y
<b>Hardship</b>	For instances when a council tax payer faces severe hardship which is out of their control	For a period and percentage approved by the Member with Responsibility for Finance		Y
<b>Section 13A</b>	For instances when a council tax payer finds themselves in crisis and all other discounts/exemptions have been considered	For a period and percentage approved by the Member with Responsibility for Finance		Y

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Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET - 10 JANUARY 2022</b>
Report Number	<b>AGENDA ITEM 12</b>
Subject	<b>DISCRETIONARY BUSINESS RATE RELIEF POLICY</b>
Wards affected	All
Accountable member	<p>CLlr Mike Every – Deputy Leader and Cabinet Member with Responsibility for Finance</p> <p>Email: <a href="mailto:mike.every@cotswold.gov.uk">mike.every@cotswold.gov.uk</a></p>
Accountable officer	<p>Mandy Fathers – Business Manager for Operations and Enabling</p> <p>Email: <a href="mailto:mandy.fathers@publicagroup.uk">mandy.fathers@publicagroup.uk</a></p>
Summary/Purpose	To consider the implementation of a Discretionary Rate Relief Policy in line with Section 47 of the Local Government Finance Act (1988)
Annexes	Annex A – Discretionary Rate Relief Policy
Recommendation(s)	<p>Cabinet is recommended:</p> <p><i>a) To approve the Discretionary Rate Relief Policy at Annex A</i></p>
Corporate priorities	<ul style="list-style-type: none"> <li>● Delivering our services to the highest standards</li> <li>● Supporting businesses to grow in a green, sustainable manner, and to provide high value jobs</li> </ul>
Key Decision	NO
Exempt	NO
Consultees/ Consultation	<p>Leader of the Council. Deputy Leader and Cabinet Member with Responsibility for Finance, Chief Executive Officer, Deputy Chief Executive Office, Monitoring Officer, Interim Head of Legal Services, Group Manager for Resident Services, Revenues Manager.</p>

## 1. BACKGROUND



- 1.1 The Council is responsible for collecting business rates on behalf of the Government; a share of which now forms part of the Council's core funding.
- 1.2 The powers to grant relief from business rates are set out within the Local Government Finance Act 1988 (LGFA). Relief may be divided into two types, mandatory and discretionary relief.
- 1.3 In addition, section 69 of the Localism Act 2011, amended section 47 of the LGFA to allow billing authorities to reduce the business rates of any local ratepayer. Applications for this category of relief must be in writing and will be considered on an individual basis by Cabinet.

## 2. MAIN POINTS

- 2.1 The Council does not have in place a Discretionary Rate Relief policy. Instead it has relied on Government legislation, guidance manuals and the Councils constitution when administering and awarding such reliefs.
- 2.2 However, following on from the Local Government Ombudsman's (LGO) recommendations to the Council in August 2021 to implement a Discretionary Council Tax Discount policy, and to ensure the Council is not at risk of future criticism, a policy to address business rate reliefs has been created as set out in Annex A (attached)

## 3. FINANCIAL IMPLICATIONS

- 3.1 Following the introduction of the Localised Business Rates Retention scheme in 2013/14, the cost of rate is funded by the Collection Fund and therefore it is split in the pre-set proportions of the Collection Fund as follows:

Central Government	50%
County Council	10%
District Council	40%

- 3.2 Because relief is funded directly from the Collection Fund, its cost is less transparent as there is no longer a financing line with the General Fund – any relief granted will merely reduce the share the Council receives from Business Rates income.
- 3.3 This changes the Council's relationship with the cost implications of all types of relief as it now funds 40%, including mandatory relief. Clearly this puts the Council at a significant disadvantage to the previous situation where mandatory relief (the bulk of reliefs awarded) was funded by the Government.
- 3.4 The total impact on the Council in 2020/21 through its awarding of mandatory and discretionary reliefs was:



Total mandatory relief applied	
£2,663,481	
Total discretionary relief applied	£ 71,437
Total impact on Cotswold District (40%)	£1,093,967

**3.5** It should also be noted that £30,038 applied to discretionary relief for 2020/21 was in respect of rural rate relief. Government increased the mandatory rural rate relief from 50% to 100% in April 2017, but has as yet, not amended its legislation. This means the additional 50% (although now mandatory) is reported as discretionary.

#### **4. LEGAL IMPLICATIONS**

**4.1** Section 47 of the Local Government Finance Act 1988 gives powers to local councils to grant discretionary rate relief. Subsequent legislation in the Localism Act 2011 has extended these powers to allow wider granting of local discretionary relief.

#### **5. RISK ASSESSMENT**

**5.1** There is a risk that if the Government increases the rate retention percentage from 50% (of which 10% is for the County Council) the financial impact on the local Councils would increase significantly.

#### **6. EQUALITIES IMPACT**

**6.1** There are no specific equality issues but the Council may consider more favourably applications from organisations that work in the District with vulnerable, disadvantaged or underrepresented groups.

#### **7. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

**7.1** There are no specific implications in relation to climate change.

#### **8. ALTERNATIVE OPTIONS**

**8.1** An extended period of relief beyond one year period was considered, but in light of the potential risks outlined in Section 7 of this report the view is taken that a one year period is appropriate.



**9. BACKGROUND PAPERS**

**9.1** None

(END)



**COTSWOLD**  
**DISTRICT COUNCIL**

# **DISCRETIONARY RATE RELIEF POLICY**

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## **I. Introduction**

- 1.1 The Council understands the importance that local businesses and organisations play in achieving its priorities and ensuring its communities and businesses are able to develop and thrive within the District.
- 1.2 Councils have the power to award relief from the payment of Non-Domestic Rates (Business Rates) to organisations and businesses that meet certain criteria. Public funds are not, however, unlimited and a proportion of any relief granted is met by the Council Tax payers of the District. The Council therefore needs to be satisfied that money invested this way will be repaid in economic and/or community benefit.
- 1.3 The power for granting discretionary rate relief is provided for by Section 47 of the Local Government Finance Act 1988. This has been amended by subsequent legislation which gives wider powers to grant discretionary relief to any ratepayer where the authority feels the granting of such relief would benefit the local community.
- 1.4 This policy is designed to provide guidance to officers and ratepayers on the application of Discretionary Rate Relief.
- 1.5 The policy covers the following types of discretionary rate relief:
- Charitable rate relief
  - Community Amateur Sports Clubs (CASCs)
  - Rate relief for not-for-profit organisations
  - Hardship relief
  - Temporary relief for partly occupied properties
  - Local discounts and incentives
- 1.6 This policy document outlines the various areas of local discretion and the Council's approach to the various reliefs. This approach has regard to the impact:
- of granting discretionary relief on the Council's wider financial position and the impact on its Council Tax payers;
  - on the organisations and businesses that currently receive or may apply for relief in the future;
  - on the residents of Cotswold District Council if relief is awarded and the economic benefits to the District.

## **2. The Discretionary Rate Relief Scheme**

- 2.1 Discretionary rate relief (DRR) is granted in accordance with Section 43 of the Local Government Finances Act 1988 and Sections 47 and 49 of the Local Government Finance Act 1988 as amended by the Localism Act 2011.

2.2 Section 69 of the Localism Act amended section 47 of the Local Government Finance Act 1988 to allow billing authorities to fund their own local discounts. The Council can grant business rate discounts and incentives as it sees fit within the limits of primary legislation and the rules on State Aid. These powers can be used to encourage new business and investment as well as support local shops or services to the community.

2.3 The legislation requires the Council to maintain a DRR scheme to award relief of up to 100% to certain organisations and businesses which operate within specified criteria. This includes:

- Charitable bodies already in receipt of mandatory relief of 80%. The Council has a discretion to 'top-up' this relief to 100% of the business rates due
- Registered community amateur sports clubs (CASCs) already in receipt of mandatory relief of 80%
- Non-profit making organisations – the Council has discretion to grant relief of up to 100% of the business rates due
- DRR for 'other rural businesses'
- Relief on the grounds of hardship
- Relief for part-occupied premises
- Local discounts and incentives

2.4 In making decisions the Council may:

- Grant relief up to a maximum of 100% of the business rates due;
- or
- Refuse any application for relief

2.5 Whilst mandatory relief can be backdated to previous financial years; legislation permits discretionary relief only to be awarded back to the start of the previous financial year where the application is submitted and assessed prior to the end of September in a relevant year.

2.6 In the majority of cases discretionary relief will be granted for a period of two financial years. Successful applications will be sent a letter confirming the new award of discretionary relief. This letter will explain the period of award and the date it will end.

### **3. The application process**

3.1 Applications for relief must be made by completing an application form and submitting the relevant supporting information which includes:

- Details of the applicant's main purposes and objectives (where applicable) as set out in a written constitution, a memorandum of association or membership rules;
- A full set of audited accounts relating to the last two financial years. Where audited accounts are not available projections should be provided instead, along with bank statements;
- Details of how the organisation meets the relevant criteria detailed in these guidelines

3.2 Any applications which are made without the supporting documentation will be subject to a decision being made solely on the information that is available at the time of the decision.

3.3 As a guide, to be eligible for discretionary rate relief a charity/organisation must not have enough unrestricted funds/reserves to continue to operate for more than 12 months unless

a business plan exists detailing how these additional funds are to be used to benefit the local community.

- 3.4 In exceptional cases, discretionary rate relief will be granted to organisations which have enough financial resources in unrestricted funds/reserves to continue to operate for more than 12 months. This may include charities and community organisations which require a large amount of available resources to sustain the service they deliver to the community. In such cases the application must be able to demonstrate it offers a service which the local residents depend on and which they would be unlikely to find elsewhere in the District.
- 3.5 The Council will aim to make a decision within one calendar month of the application and supporting information being received. Decisions on the award of discretionary rate relief will be made by the Member with responsibility for Finance in consultation with the Chief Finance Officer. Ratepayers are required to continue to pay business rates whilst their application is being considered. Failure to make payment will result in the Council pursuing collection through the usual enforcement procedures which could result in Court action.
- 3.6 There is no statutory right of appeal against a decision other than by way of judicial review. An unsuccessful applicant may make a request for the Council to review its decision, but only where:
  - 1) Additional information relevant to the application that was not made available at the time the decision was made becomes available.
  - 2) There are grounds to believe the application or supporting information was not interpreted correctly at the time the decision was made.
- 3.7 A request for a review must be made within one calendar month of notification of the decision and must set out the reasons for the request and any supporting information. Cases will be reviewed by the Cabinet.
- 3.8 In line with the model of Business Rate Retention Scheme in operation in December 2021, the cost of awarding discretionary relief is apportioned as follows:
  - 50% will be funded by Central Government
  - 40% will be funded by Cotswold District Council
  - 10% will be funded by Gloucestershire County Council
- 3.10 Any decision regarding rate relief will be communicated to the applicant in writing. Where the decision is a refusal the reasons for refusal will be provided in the letter.
- 3.11 A review of the guidelines will be undertaken every 3 years in line with the Valuation Office Agency's revaluation cycle, or if business rates legislation is amended, or as necessary to ensure it complies with current legislation and Cotswold District Council's priorities.
- 3.12 The ratepayer must inform the Council immediately of any changes which may affect their eligibility for relief.

#### **4. Charitable Rate Relief**

4.1 Mandatory Rate Relief of 80% is granted to charities where:

- The ratepayer is a charity or the trustee of a charity; and
- The property is wholly or mainly used for charitable purposes (including charity shops where the goods sold are mainly donated and the proceeds are used for the purposes of the charity).

4.2 Registration under the Charities Act 1993 is conclusive evidence of charitable status. Bodies which are exempt charities are also eligible for mandatory relief.

4.3 In cases where a charity is in receipt of mandatory relief of 80% the Council has direction to grant up to 20% discretionary relief (top-up). The Council will consider applications for discretionary relief from charities based on their own merits on a case by case basis. The principle consideration in awarding relief is that it is in the best interests of the residents and Council Tax payers of Cotswold District to do so and it produces a local benefit as the Council must contribute to the cost of each award.

4.4 Each case will be assessed on its own merits, but generally top-up discretionary relief will only be awarded to the following charities or excepted organisations:

- Scouts, guides, cadets and other clubs and organisations for young people;
- Organisations providing support in the form of advice, employment training and counselling;
- Community schemes including those providing support for those over retirement age, community transport and volunteer organisations;
- Charitable supporting clubs;
- Armed Forces veterans associations;
- Locally based leisure and cultural organisations.

4.5 The following general exclusions will apply:

- 'Top-up' relief will only be granted to local charities (defined as those set up with the sole purpose of assisting residents of Cotswold District and whose main office is situated within the District);
- Unless a special case for financial hardship can be proved 'top-up' to national charities (including charity shops) will not be awarded;
- 'Top-up' relief for Housing Associations will not be granted.

#### **5. Registered Community Amateur Sports Clubs (CASCs)**

5.1 Registered Community Amateur Sports clubs (CASCs) are entitled to 80% mandatory relief. The Council will consider applications for discretionary rate 'top-up' from CASCs based on their own merits on an application by application basis.

5.2 The Council will consider applications that can demonstrate:

- The contribution the organisation makes to Cotswold District;
- The club is open to the whole community and its membership fees are not excessive;
- It is a non-profit organisation;

- Evidence that every effort is made by the organisation to encourage open membership from groups such as young people, disabled persons, and those over retirement age;
- Schemes of education and training are provided particularly for young people, disabled persons, women and those over retirement age;
- How the CASC supports and links into the Council's priorities.

5.3 Applications will only be considered where the club has an open access policy. If a club accepts members who have reached a certain standard, rather than seeking to promote the attainment of excellence by developing sporting aptitude, it does not fulfil the requirements.

5.4 Although clubs should be open to all without discrimination, single sex clubs may be permitted where such restrictions are a genuine result of physical restraint (such as changing room facilities) or the requirement of the sport. In such cases the application will be required to provide evidence of these factors.

5.5 It should be noted that sports clubs which run a bar are unlikely to be awarded discretionary rate relief if their main purpose is the sale of food and drink. If the sale of food and drink by the organisation aids the overall operation and development of the organisation meaning it achieves its objectives this is permissible if the principle objectives of the organisation meet the eligibility criteria detailed in 5.2. If the bar makes a profit this relief must be reinvested to help the organisation meet its principal objectives. Financial information will be required to evidence any profit and its use.

## **6. Rate relief for not-for –profit organisations**

6.1 Not-for-profit organisations which are not classed as registered charities or CASCs can apply for discretionary rate relief of up to 100%. Such organisations include those which are philanthropic, religious, concerned with education or social welfare, science, literature, the fine arts, recreation or are otherwise beneficial to the community.

6.2 The Council will consider applications from organisations which can demonstrate:

- Its activities support at least one of the Council's priorities;
- It promotes its service for the benefit of Cotswold District residents;
- Membership of the organisation is open to all members of the community;
- The facilities of the organisation are to be made available, where practicable, to other organisations and groups;
- The organisation operates in such a way that it does not discriminate against any section of the community;
- It is not established or conducted for the primary purpose of profit.

6.3 If the organisation applying for discretionary rate relief requires membership or any entry fee the Council will consider whether:

- Membership is open to everyone regardless of race, ethnicity, sex, marital or parental status, sexual orientation, creed, disability, age, religious affiliation or political belief;
- The subscription or fee is set at a level which is not prohibitively high and is affordable by most sections of the community;
- Fee reductions are offered to certain groups, for example the under 18s and over 60s;

- Membership is encouraged from the unemployed, young people not in employment, education or training, those of retirement age and people with disabilities.

6.4 Where the applicant organisation requires membership, at least 50% of members should reside within the Cotswold District and evidence of this will be required.

6.5 The organisation must provide a copy of their constitution and copies of the latest two years of audited annual accounts where available.

## **7. Hardship Relief**

7.1 The Council has discretion under Section 49 of the Local Government Finance Act 1988 to grant relief of up to 100% where hardship is demonstrated. Hardship relief can only be considered if it would be reasonable to do so in the interests of Council Tax payers in general.

7.2 Hardship relief will be awarded where the business is suffering from unexpected hardship which is outside of the normal risks associated with business. Reduction or remission of business rates on the grounds of hardship will only be made in exceptional circumstances.

7.3 Hardship relief is granted at the discretion of the Council which can reduce or remit the amount of business rates due provided it is satisfied that:

- The ratepayer would sustain hardship if it did not do so; and
- It is reasonable to do so having regard to the interests of its council tax payers,

7.4 The following factors will be considered in assessing the application:

- The test of hardship needs not to be confined strictly to financial hardship. All relevant factors affecting the ability of the business to meet its rates liability will be considered.
- The interests of Council Tax payers in the area may be wider than direct financial interests. Examples of this include where employment prospects in the area would be worsened by a company going out of business or the amenities of the area being reduced.
- The ratepayer must provide evidence of hardship, for example a severe loss or marked decline in trade compared to similar periods in previous years.
- The ratepayer must be able to show evidence of its viability for the future which is two years for these purposes.

7.5 A business will not be considered for hardship relief in the following circumstances:

- Where the business is profitable;
- Where the business has experienced a minor loss in trade;
- Where the drawings/remuneration of directors, partnerships or sole traders are of an amount not deemed reasonable by the Council;
- Where the business is new and hardship relief is being requested to fund the initial progression of the business;
- Where the property is empty;
- Where similar goods or services are already being provided in the locality or within a reasonable distance.

7.6 Prior to any award being made the business is expected to act to mitigate or alleviate their hardship by:

- Considering other options such as renegotiating with creditors;
- Contacting the Council's Business Advice officer;
- Having in place a business plan to address the hardship.

7.7 Applications for hardship relief shall be regarded as a last resort and will only be accepted after consideration of any other forms of rate relief for which the applicant may be eligible for.

7.8 The period and amount of any award will be determined on a case by case basis, but may be up to 100% of business rates liability.

7.9 Hardship relief will only be granted for short periods of time and usually up to a maximum of 6 months.

## **8. Properties partly occupied for a temporary period**

8.1 There may be times where a property is only partly occupied for a short period of time. This may be due to a business relocating to a new property. In certain circumstances, the Council may use its discretion to award partly occupied relief which is also known as Section 44a (Section 44a of the Local Government Finance Act 1988).

8.2 In these circumstances the Council may request that the Valuation Office Agency apportions the rateable value of the property between occupied and unoccupied parts.

8.3 Section 44a relief may be awarded in the following circumstances:

- Where the occupied and unoccupied parts of the property can easily be separately assessed; or
- Where there are short term practical or financial difficulties in either occupying or vacating the premises.

8.4 The part occupation must be for a temporary period only. Rate relief will not be awarded where the partial occupation is due to the normal day to day operation of the business, for example where a warehouse has despatched a large order and no longer needs to store stock.

8.5 For the purposes of this policy a period of up to 6 months will be considered temporary. Periods of time exceeding 6 months will be treated as a permanent change and will not be eligible for partly occupied relief.

8.6 Relief will not be awarded where it appears to the Council that part of the property is being kept empty for the sole purpose of claiming rate relief.

8.7 Prior to an award being made, a visit to the premises will be made by a Council Officer to establish the exact area of the property that is empty. The application must be supported by a plan of the property which clearly marks the boundary of the occupied and unoccupied parts. This plan will be given to the Valuation Office Agency to apportion the rateable value. Further visits may be made to the property throughout the duration of the relief to establish that the property is still partly occupied.

8.8 Part occupied relief will end if one of the following applies:

- The financial year comes to an end;
- The end of the award;
- Where part or all the unoccupied parts become occupied;
- Where the whole of the property becomes unoccupied;
- Where the liability for the property changes.

## 9. State Aid

9.1 Prior to 1 January 2021, the award of discretionary rate relief was considered likely to amount to State Aid as defined by the EU. The EU required that all State Aid (including discretionary rate relief) complied with the De Minimis Regulations EC 1407/2013. The De Minimis Regulations allow an undertaking to receive up to €200,000 aid over a rolling three year period.

9.2 From 1 January 2021, the United Kingdom left the EU Single Market and Customs Union and is no longer subject to the De Minimis Regulations.

9.3 The Government has introduced its own rules regarding state subsidies. Discretionary rate relief is considered a subsidy under the rules, but the matters that must be considered all relate to the effect of the subsidy on international trade. In making an award the public body making it must consider:

- effects on international trade;
- the subsidy is prohibited under the World Trading organisation (WTO) rules;
- are in line with those agreed by the UK –EU Cooperation and Trade Agreement;
- are unlikely to trigger a dispute under WTO trade rules.

9.4 It is unlikely that an award of discretionary rate relief would fall counter to these rules.

## 10. Complaints and Appeals

10.1 Any customer who feels that they have not been correctly dealt with can use the Customer Feedback procedure to make a complaint.

10.2 Rating Law does not allow for a ratepayer to appeal a decision by the Council on discretionary rate relief. However in the interest of natural justice and in keeping with customer care, practice and principles of open government, this policy provides a mechanism for review of any decision.

10.3 If a ratepayer is unhappy with the decision made, full details should be submitted, in writing to the Council within one calendar month of notification of the decision. Any review will be considered by the Cabinet.

## 11. Fraud

11.1 The Council is committed to the prevention and detection of fraud and the protection of public funds. Cases of suspected fraud will be referred to the Counter Fraud Unit (CFU) for investigations which may result in clawback of payments made and/or further action being taken against an individual.

## Appendix A

Category of Ratepayer	Mandatory Relief	Discretionary Relief
Charities	80%	Up to 20%
Registered Community Amateur Sports Clubs (CASCs)	80%	Up to 20%
Non-Profit Organisations	Nil	Cases considered on individual merit
Hardship Relief	Nil	Cases considered on individual merit
Partly Occupied Hereditament	Nil	Cases considered on individual merit

## **Addendum I**

### **Rural Rate Relief**

Rural Rate Relief is available for post offices, village shops, petrol filling stations and public houses subject to rateable value restrictions, where they are the only business of that type in the rural settlement.

The Government announced in the Autumn Statement on 23 November 2016 that the relief would increase from 50% to 100% from 1 April 2017.

As a measure the Government has not changed legislation, instead local authorities are required to adopt a local scheme and decide each individual case using their discretionary relief powers introduced by the Localism Act (under Section 47 of the Local Finance Act 1988).

### **Eligibility Criteria**

Properties that will benefit from the relief will be hereditaments that are located in a rural settlement with a population of less than 3,000 and are either:-

- a) The sole general store, food shop or post office with a rateable value of up to £8,500 or;
- b) The sole public house or petrol filling station with a rateable value of up to £12,500

The Districts Rural Settlement List is reviewed annually, and designates settlements within a rural area which have a population of 3,000 or less.

### **Amount of Rural Rate Relief available**

Anyone who is entitled to mandatory Rural Rate Relief will be eligible for the increased level of discount of 100% off their business rate liability.

### **Recalculation of Rural Rate Relief**

The amount of relief awarded will be recalculated in the event of a change in circumstances, including a backdated change to the rateable value of the hereditament, whether arising during the year in question or during a later year.

## **Addendum 2**

### **Relief for Local Newspapers**

From 1 April 2017 the Government announced a business rates discount of up to £1,500 a year to business rates accounts for office space occupied by local newspapers up to a maximum of one discount per local newspaper title and per hereditament. This relief scheme has been extended to 31 March 2025.

Local Authorities are required to adopt a local scheme and decide each individual case using their discretionary relief powers introduced by the Localism Act (under Section 47 of the Local Government Act 1988).

The Council will use the Government criteria to determine qualifying ratepayers.

### **Eligibility Criteria**

Properties that will benefit are those that meet the following criteria:

- The property must be occupied by a local newspaper and must be wholly or mainly used as office premises for journalists and reporters; and,
- The local newspaper must be what is considered to be 'traditional local newspapers'. The relief is not available to magazines.

'Wholly or mainly' is a test on use rather than occupation. Therefore, properties which are occupied but not wholly or mainly used for the qualifying purpose will not qualify for the relief.

### **Amount of Relief**

Up to £1,500 relief a year; the amount of relief is limited to a maximum of one discount:

- Per newspaper title (e.g. per newspaper name); and,
- Per hereditament (property) that is wholly or mainly occupied by the local newspaper.

### **Recalculation of Relief**

The amount of local newspaper relief awarded will be recalculated in the event of a change in circumstances, including changes to occupation of premises by the local newspaper or identification that the relief has been applied on additional accounts.

### **Application for Local Newspaper Relief**

Where possible ratepayers entitled to the relief will be identified by the Council. Ratepayers who believe they might be entitled to this relief should contact the Council.

Amounts of relief awarded under this policy will be notified by the issuing of a rates bill.

Decisions in respect of Local Newspaper Relief will be made by officers.

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Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET – 10 JANUARY 2022</b>
Report Number	<b>AGENDA ITEM 13</b>
Subject	<b>Approval of the Approach to Litter Bin Placement and Renewal Programme in Cotswold District</b>
Wards affected	All
Accountable member	Cllr Andrew Doherty, Cabinet Member for Waste, Flooding and Environmental Health Email: <a href="mailto:Andrew.Doherty@cotswold.gov.uk">Andrew.Doherty@cotswold.gov.uk</a>
Accountable officer	Scott Williams, Business Manager – Contracts Email: <a href="mailto:scott.williams@publicagroup.uk">scott.williams@publicagroup.uk</a>
Summary/Purpose	To update Members on the issues being experienced with litter and dog bins in Cotswold District and to seek approval for a bin placement review and renewal programme to be delivered over the next five years.
Annexes	None
Recommendation(s)	That Cabinet <ul style="list-style-type: none"> <li>a) Notes the risks and financial implications relating to the provision and servicing of the current litter and dog waste bins;</li> <li>b) Approves the introduction of the set of principles for the placement of litter and dog waste bins going forward..</li> <li>c) Approves the proposal to complete a rationalisation exercise of the existing litter and dog waste bins to ensure that the coverage is suitable for the District and that bins are located in the most appropriate places and in line with the agreed set of principles referenced in b) above;</li> <li>d) Approves the principle that a charging mechanism is introduced for installation and servicing of litter bins in Town and Parish Council areas which are outside of the principles proposed in recommendation b;</li> <li>e) Supports the inclusion of an annual capital budget of up to £10,000 per annum over the next five years as part of the Council’s budget setting process in February 2022 (up to £50,000 total), for bin purchases and fitting; and</li> </ul>



	f) That officers work with Ubico to identify the revenue savings arising from this rationalisation and, by agreement, seek to reduce the contract value accordingly.
Corporate priorities	Responding to the challenges presented by the climate crisis
Key Decision	NO
Exempt	NO
Consultees/ Consultation	The following people have all been consulted on this report and the detail contained within: Councillor Andrew Doherty and Senior Council and Publica Officers.



## I. BACKGROUND

- 1.1. Under the Environmental Protection Act, Cotswold District Council is a 'Litter Authority' and is responsible for cleansing of the adopted highway within its district boundary, and may provide and maintain in any street or public place receptacles for refuse or litter (referred to as litter bins).
- 1.2. The Council has an environmental services contract with Ubico Ltd, which includes the responsibility for street cleansing and litter/dog waste bin emptying within the district.
- 1.3. It is the duty of a Litter Authority to make arrangements for the regular emptying and cleansing of any litter bins provided or maintained by them and the regular emptying must be sufficiently frequent to ensure that no such litter bin or its contents shall become a nuisance or give reasonable ground for complaint.
- 1.4. To support this and as is commonplace in other areas, the Council has for many years provided a network of litter and dog waste bins to encourage responsible disposal of those waste types. The existing provision captures litter and dog waste, which has a direct benefit to the street cleansing function, in not having to manually pick items deposited in the bins from the adopted highway. This in turn then means that the street cleansing function has been able to concentrate efforts on other cleansing duties which are important to the Council in upholding its duty as a Litter Authority, and for the benefit of local communities.
- 1.5. The Council has always aimed to provide a sufficient coverage of bins across the District, but in recent years, Town/Parish Councils have requested additional requirements which have been deemed as a nice to have, rather than critical to the service. As a result, the costs of the bin purchase and installation, has been paid for by Town/Parish Councils, but the District Council has taken on emptying them as part of the contracted works performed by Ubico.
- 1.6. However, with the existing resources available, Ubico has now reached capacity on the numbers of bins it can effectively maintain and so this leaves the Council with two options – either increase the resources at additional cost to the Council, or look to rationalise the bin portfolio to ensure that it can be effectively serviced by Ubico within the current resources.

## 2. MAIN POINTS

- 2.1 Having conducted a recent evaluation of the bin portfolio, the Council currently has approximately 1,013 litter bins and 598 dog waste bins in place, which are in varying



- 2.2 conditions and have differing levels of usage. In many cases there are multiple bins in the same location and in some cases these are seldom used.
- 2.3 People expect bins to be accessible, easy to spot – but the logistics of managing a large bin estate, and making it work as effectively as possible, is far from simple. A visible, well maintained litter bin is more likely to be used than an overfilled rusty litter bin with holes, but the Council doesn't have a replacement programme for litter/dog bins and instead has always acted to replace them on a case-by-case basis. This unfortunately means that there is a risk that a significant number of bins have all come to the end of their usable life at the same point in time and so it is appropriate to undertake a review, introduce a set of principles to ensure that the coverage is suitable for the District, and have an annual replacement programme to avoid this occurring in the future.
- 2.4 Litter and dog waste now both go to the Energy from Waste Facility and so recently stickers have been placed on litter bins in certain areas informing that dog waste can also be placed in them. In addition, brand new bins which are being installed in areas close to dog walking routes also have the information attached.

### 3. BIN PROVISION PRINCIPLES

- 3.1 Bin positioning is important because litter bins need to be placed in prime locations such as along pedestrian pathways that are well used, commercial shopping areas and in places where littering and/or dog fouling is a problem. Litter bins near fast food restaurants, bus stops and train stations also help to catch some of the 'on the go food' users. Much of the research carried out shows that people often blame their littering on a lack of bins.
- 3.2 The changing lifestyle with people in a rush means that more people are eating 'food on the go'. Research carried out by Keep Britain Tidy showed that in 80% of sites surveyed, that there was some form of 'food on the go' litter present. With the pace of daily life increasing, more and more people eat on the go, resulting in the requirement for well positioned litter bins. Whilst the amounts of litter have been impacted upon by the Coronavirus Pandemic and associated lockdown measures, it's reasonable to assume that 'food on the go' will continue to result in litter with litter amounts increasing as restrictions are relaxed and society enters a new normal.
- 3.3 It is important to consider where the demand for the litter bins will be the greatest. By providing litter bins in areas which require them, for example near to a shopping area, can play its part in preventing the dropping of litter and encourage people to dispose of litter responsibly.



- 3.4 An experiment carried out by Keep Britain Tidy showed that when a litter bin was placed within a 50 metre strip outside a row of shops, there was 10% reduction in overall littering.
- 3.5 This demonstrates that by ensuring litter bins are placed where there is demand, it will play its role in helping to reduce litter being dropped on the streets and support the overall cleanliness of the District and reduce the cost of this service.
- 3.6 Recycling litter bins can be effective if properly designed and positioned however, it's common for the material captured to be of poor quality and contaminated with non-recyclable items, such as food waste. This then risks there being greater amounts of contamination in the recycling material stream and may result in a load being rejected by the re-processor, which would mean an increase in cost for the Council.
- 3.7 The high street has been changing for a number of years and whilst there is still a high degree of footfall in certain areas, a large proportion of shoppers are now electing to make purchases online and have home deliveries. This in turn means that the high streets are shrinking and their usage is reducing, so it is important to ensure that litter bins are provided in areas where they are most effective and not outside a vacated shop or a building that used to be a public house for example. In addition, it's important to recognise that bins must be accessible to all users including those with disabilities.
- 3.8 Within the district there are a number of examples of bins being located inappropriately or two bins being located very closely together or litter and dog waste bins next to each other, which is a waste of resource.
- 3.9 Litter and dog waste bins therefore need to be available, accessible and visible to be most effective.
- 3.10 It is proposed that the Council introduces a zonal system for the placement of litter/dog waste bins as follows;
- Zone 1 – Town Centres with large numbers of commercial shops, licenced premises and food outlets**
- Litter bins would be placed in prominent positions, with multiple bins only being located in very high footfall areas
- Zone 2 – Village Centres with smaller numbers of commercial shops, licence premises and food outlets**
- Litter bins would be placed in prominent positions
- Zone 3 – Bus stops and roads having smaller grocery type shops**
- Litter bins would be placed at key bus stops/sections of the road and in prominent positions



#### **Zone 4 – Housing estates & outlying town/village areas**

Single litter and/or dog waste bins in these areas would be strategically placed based on demonstrated need - on a recognised school walking route which goes past a local shop for example

- 3.11 Officers would review the location of the current bins and make a decision using the principles as a guide, together with an accessibility assessment, to decide whether they were providing good, limited or little benefit. (In certain cases using the principles may not be feasible and in which case a bespoke assessment including accessibility would be undertaken, but these instances should be in the minority and with the increase in budget provision, the necessary money will be available to support this should there be additional costs).
- 3.12 Consultation would then be had with the relevant Town/Parish Councils where bins were in locations offering limited or little benefit, including those which had previously been paid for by that Town/Parish Council, with the proposal that they be removed and providing they were in good order, used to increase the capacity in areas with a greater need or kept for a future replacement. Alternatively, where the Town/Parish Council were keen to see bins in a particular position, but they didn't fit into the zonal category, nor were they perceived to offer a significant support to the overall cleansing service, then that Town/Parish Council could pay for the bin installation and regular emptying.
- 3.13 A [report on determining the impact on litter levels when removing litter bins from locations across Herefordshire](http://www.wrap.org.uk/sites/files/wrap/Herefordshire_Council.pdf) showed that it is incorrect to assume that the removal of litter bins would automatically result in increased litter. With effective planning and the necessary Town/Parish Council consultation, the removal of certain litter bins could actually result in a reduction in litter, if similar results were seen in Cotswold District. The URL for the report is [http://www.wrap.org.uk/sites/files/wrap/Herefordshire Council.pdf](http://www.wrap.org.uk/sites/files/wrap/Herefordshire_Council.pdf)
- 3.14 Using the £10,000 capital budget provision, the bins in the worst state of repair would be replaced using the zonal assessment and a co-ordinated approach between the Council, Ubico and the relevant Town or Parish Council responsible.
- 3.15 This approach would also reduce the litter bin related complaints from residents and Town or Parish Councils.
- 3.16 Earlier this year West Oxfordshire supported the introduction of the same set of principles and has seen a reduction so far of 261 litter/dog waste bins with more to follow.



#### 4. FINANCIAL IMPLICATIONS

- 4.1 The Ubico provision required to empty the current litter and dog bins across the District is approximately £175k per annum – but these costs are built in to the overall street cleansing contract costs and therefore not itemised separately. If the recommendations within this report are supported, officers will work with Ubico to review the costs of providing the service annually and identify the revenue savings arising from this rationalisation and, by agreement, seek to reduce the contract value accordingly which would be factored in to the budget setting process.
- 4.2 Whilst a proportion of cost is already captured within the Ubico contract and supporting budget relating to existing resources, Ubico has estimated that it costs up to £150 to install a new litter/dog waste bin because of the complexities brought about by having to liaise with all service providers - gas, water, telecoms and electric prior to the works being undertaken with labour and the materials involved - postcrete, slabs, thunder bolts and fittings. Replacing existing bins where there is no need to install a new concrete base would be lower in cost due to less materials being required. In addition, commonly in that case there would not be the need to liaise with third party utility companies, so for the purposes of this review an average cost of £100 is assumed to fit each bin.
- 4.3 Officer's initial estimate is that a number of litter and dog bins can be consolidated and the number can be reduced by up to 25% without having any detrimental impact on service provision, In addition, there are a number of examples of bins being located inappropriately and offering little benefit so it is assumed that these could be removed. This reduction in the number of bins having to be serviced would equate to a saving on the current expenditure, but a large proportion of these costs are related to the pool of labour used to complete all of the cleansing activities in the district, which could not be reduced and are therefore non-cashable. If however 25% were removed, there would be cost reductions associated with a reduction in fuel, and so officers would work with Ubico to capture these savings and look at further efficiencies as part of the programme.
- 4.4 With a litter bin portfolio which reflects the needs of the district and provides effective coverage, it is anticipated that operational savings would be available in reduced time and fuel (as per 4.3). There would also be less Co2 produced, which would go towards supporting the Councils aspirations in tackling the declared climate emergency.
- 4.5 A budget growth of £10,000 capital is proposed for a replacement and fitting fund, and would allow for the purchase and fitting of approximately 40 (£250 each = £150 bin & £100 fitting) of the new style litter and dog waste bins.



- 4.6** At this stage it is not possible to estimate the likely demand from Towns and Parish Councils to empty bins which don't fall into one of the zones, but any revenue monies generated would go to offset some of the costs of providing the service.

## **5. LEGAL IMPLICATIONS**

- 5.1** The Council is legally required to cleanse the adopted highway under the Environmental Protection Act and as a 'Litter Authority', but there is no stipulation on the type and/or number of litter/dog waste bins which must be provided.

## **6. RISK ASSESSMENT**

- 6.1** The Pros and Cons of rationalising the litter/dog waste bin portfolio and adopting a replacement programme for the next five years are set out below:

### **6.2** Pros

- Builds in an effective replacement programme using agreed parameters for bin placements.
- Provides effective coverage of litter/dog waste bins and limits wasted resources.
- Reduces cost of collecting litter/dog waste by Ubico and therefore the Council.
- Frees up cleansing staff for other duties.
- Reduces complaints / calls / press enquiries and potentially reputational damage.
- Reduces demand on ERS team in having to investigate littering with frequently no evidence present.

### **6.3** Cons

- Littering/dog fouling may increase in areas where a bin has been removed or moved however with effective communication with Towns and Parish Councils on any changes, it is believed that this risk is low.
- It's difficult to establish monetary savings from the UBICO contract, other than a reduction in fuel from litter bins emptying. Further work would be required on this but would be built in as part of the benefits realisation under the Environmental Services Innovation Programme (ESIP).



- Removal of bins provided by CDC may lead to criticism, but the communications needs to be clear that there is a strategic and effective provision of litter/dog waste bins for residents and visitors to the district, and that the programme future proofs the ongoing replacement requirements for the next five years.

## **7. EQUALITIES IMPACT**

- 7.1** Litter has direct financial, environmental and health consequences to individuals and communities. To aid in the prevention of littering, and to save the cost of street cleaning it is necessary to consider the positioning of litter bins, ensuring they are placed in key locations. It is important to remember that litter bins should be accessible, available and visible.
- 7.2** The recommendations within this report will have a positive effect on the different service users, customers and staff, because the Council will improve the network of litter/dog waste bins and have these resources in the right areas. In addition, the formalised replacement program will ensure that bins needing replacement will be actioned promptly.

## **8. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

- 8.1** Having litter/dog waste bins strategically positioned will optimise the Ubico collections and should reduce fuel usage, which will have a direct carbon benefit in lower emissions and the CO<sub>2</sub> produced.
- 8.2.** Having a robust set of principles and replacement programme for litter/dog waste bins will ensure that they are fit for purpose and able to effectively hold litter and dog waste.
- 8.3.** If recycling litter bins were installed in appropriate locations and used correctly, then there would be a direct climate benefit, in diverting the material captured away from energy recovery.

## **9. ALTERNATIVE OPTIONS**

- 9.1** The alternatives to implementing a litter/dog waste bin siting and replacement strategy would be to:
- Retain the current approach with the large number of bins, accepting that they are not all in the correct locations and Ubico will likely be wasting time and fuel in having to visit them;



- Accept that Ubico will not be able to install any further bins and have the ability to collect from all of them, and so additional resources would be required sooner than if the bin estate is managed by way of the replacement programme;
- Accept that without an agreed set of principles, the location of litter bins is likely to be decided upon with little evidence to support their effectiveness.

## **10. BACKGROUND PAPERS**

### **10.1 None**

(END)

Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET - 10 JANUARY 2022
Report Number	AGENDA ITEM 14
Subject	BROADBAND DELIVERY UPDATE
Wards affected	ALL
Accountable member	Cllr Tony Dale, Cabinet Member for Economy and Council Transformation Email: <a href="mailto:tony.dale@cotswold.gov.uk">tony.dale@cotswold.gov.uk</a>
Accountable officer	Paul James, Economic Development Lead Email: <a href="mailto:paul.james@cotswold.gov.uk">paul.james@cotswold.gov.uk</a>
Summary/Purpose	To update Members on progress in delivering high speed broadband across the District
Annexes	None.
Recommendation/s	<p>a) <i>That progress in delivering high speed broadband across the District is noted.</i></p> <p>b) <i>That the £500k allocation for broadband in the capital budget set aside in 2016 remains in place.</i></p> <p>c) <i>That Officers work with Fastershire to draw up a top-up scheme for their existing Community Broadband Grant, for approval by Cabinet, to assist with delivery of broadband within the District that would otherwise not be viable.</i></p> <p>d) <i>That any requests for drawdown of the capital allocation in the meantime are subject to business case approval by Cabinet/Council as necessary.</i></p> <p>e) <i>That annual updates on broadband delivery within the District are brought to Cabinet.</i></p>
Corporate priorities	Ensure the benefits of the internet and digital technologies are accessible to everyone in the district
Key Decision	NO
Exempt	NO
Consultees/ Consultation	Cotswold Economic Advisory Group, Fastershire



## 1. BACKGROUND

- 1.1 Broadband is nowadays viewed as an essential utility, alongside heating, electricity and running water. It is necessary for many households to be able to access basic services, as well as for businesses to be able to function effectively. During the pandemic, with people ordered to work from home where possible, the need for good broadband has come into sharp focus. The lack of good quality broadband is one factor which can lead to digital exclusion and this can contribute to social isolation as well as having obvious economic disadvantages. Delivery of broadband is a greater challenge in rural areas due to the sparsity of the population, which increases costs and means there are fewer customers for it to be delivered commercially than in urban areas.

## 2. PROGRESS UPDATES

- 2.1. Delivery of broadband is largely a commercial activity, with the market dominated by a number of large providers such as BT, EE, TalkTalk, Sky, Vodafone and Virgin Media. These are a mixture of those who have their own infrastructure (such as BT Openreach), those who act as wholesalers and others who agree bulk purchases for their own retail customers. Virgin Media have their own infrastructure but do not operate within the Cotswold District. The decision by the Government to open up the Openreach infrastructure for other accredited providers to use has seen a number of other players entering the marketplace. Gigaclear via Fastershire has a significant presence in the District and other providers are believed to be looking to supply market towns within the area.
- 2.2. However, good quality broadband would not be provided universally if left to the market alone. Therefore the Government has made available significant funding to speed up the rollout of broadband through Building Digital UK (BDUK), which is part of the Department for Digital, Culture, Media and Sport. In a Gloucestershire context, this is channelled through the Fastershire project which is a partnership between Gloucestershire County Council and Herefordshire Council.
- 2.3. Broadband technology has moved on over time. Initially copper wires were used, but now fibre optic cables (shortened to 'fibre') which are able to support greater speeds are the norm. When we talk about fibre, this can either be 'fibre to the cabinet' (FTTC - which serves a number of premises and where copper wires are used for the final section of the journey to each individual premises) and 'fibre to the premises' (FTTP - which, as the name suggests, uses fibre optic cables all the way to the property).
- 2.4. As technology has moved on, for example with gaming, streaming of films and more widespread use of video call platforms such as Zoom, greater bandwidth is required. Superfast broadband is defined as download speeds of 30mbps and above. Ultrafast is defined as download speeds of 100mbps and above. Whereas 30mbps would have been sufficient for most purposes in the past, it is now seen as less than ideal for households with multiple users. Installation of broadband is currently focused on being 'Gigabit capable'. A gigabit is the fastest and most reliable available broadband speed and is the same as 1,000 megabits per second (Mbps). Gigabit-capable means that the connection can handle speeds



- 2.5. of 1,000 Mbps but users only sign up to speeds they can afford. As demand increases, users can choose the option to pay for more speed as required.
- 2.6. It is worth noting that advertised internet speeds are not always consistent with what consumers experience for a variety of reasons. The use of wi-fi, although convenient, is not a direct internet connection and in itself leads to a loss of speed. The use of multiple devices within a premises, including tablets and mobile phones, can all have an impact on bandwidth particularly when applications like video conferencing and streaming are used.
- 2.7. The Government has introduced, from March 2020, a Universal Service Obligation (USO) whereby households and businesses are able to request an improved connection if they have a download speed of less than 10mbps or an upload speed of less than 1mbps if they will not be covered by a public broadband scheme in the next 12 months. If the cost of their share of the network is less than £3400 they won't have to pay and if it is more than that they need to pay the excess costs above £3400.

#### Fastershire Community Broadband Grant

- 2.8. The Fastershire Community Broadband Grant is targeting the final 3-4% of properties in Herefordshire and Gloucestershire that still require access to a superfast broadband of 30mbps or more.

The scheme is entirely funded by Herefordshire Council and Gloucestershire County Council and designed to help find a solution specific for each community. Fastershire will fund up to a maximum of £500,000 per community project.

The purpose of the grant is to provide these properties with access to superfast connection (30mbps or above), but the scheme will only invest in networks that are capable of providing access to gigabit connections (1,000mbps) so community projects that are successful will have access to Fibre to the Property. <https://www.fastershire.com/about-fastershire/community-broadband-grant>.

In some cases, the solution may mean using a new supplier or different technology to reach a deeply rural community, or to extend an existing network further to reach outlying properties that were too expensive to connect in previously.

Any property in the Cotswold District either residential or business can benefit from the grant provided that it:

- Is listed in Fastershire address data
- Cannot access a superfast connection (30mbps or above)
- Is not included in a planned commercial rollout by a network provider
- Is not included in one of Fastershire's on-going rollout contracts with Openreach, Gigaclear or Airband.
- Has not already benefited from a Fastershire grant

Properties at Draycot and Northwick Park have already benefited from the grant and Fastershire are looking to identify others within the District who would qualify. There is a



role for councillors as community leaders to raise awareness of the scheme and encourage eligible communities to come forward.

- 2.9. Progress has been made with delivery of broadband across the District in recent years. According to the Think Broadband website, the District has coverage of 97% of superfast broadband and almost 46% of ultrafast broadband. It is also worth noting that of the 45.8% of ultrafast broadband, 45.5% is delivered by full fibre, compared with just 25.2% nationally. Other comparable local rural districts have coverage as follows:

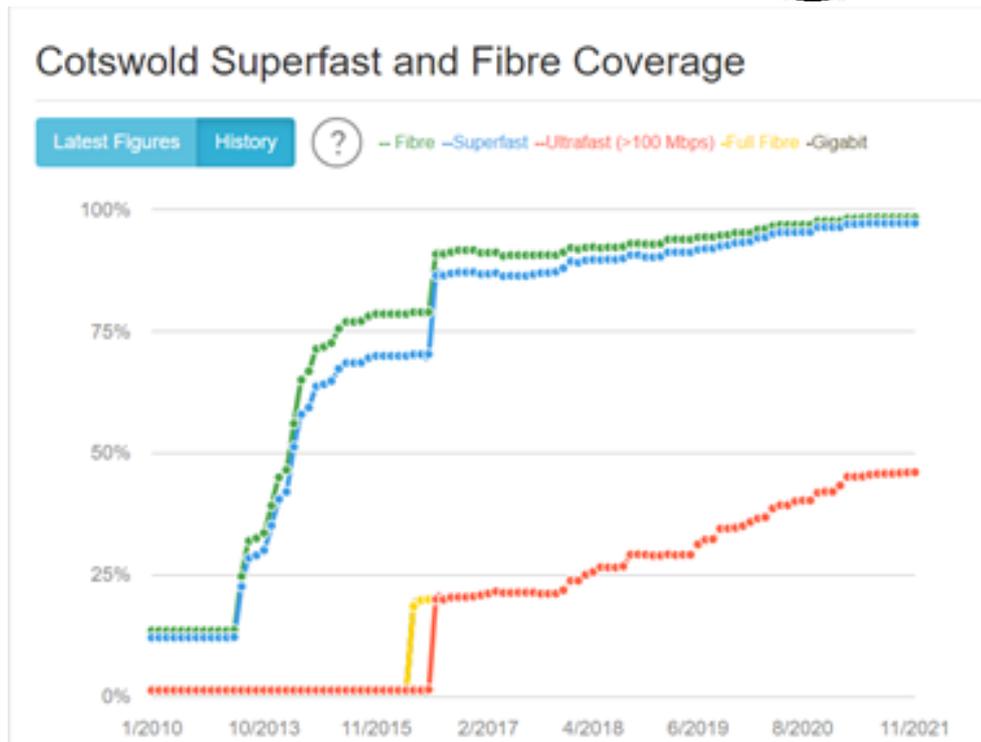
Table I

District	Superfast (%)	Ultrafast (%)
UK Average	96.9	67.3
Cotswold	97.2	45.8
Forest of Dean	86.8	34.1
Stroud	94.8	25
Tewkesbury	98.3	67.3
West Oxfordshire	99	73

Source: Think Broadband website

The image below shows how coverage has improved dramatically in the District over the last decade. The merging of the red and yellow lines from 2015 onwards shows that the expansion of ultrafast broadband (100mbps and over) has been delivered with full fibre connections, which is not the case everywhere.

Image 1



Source :Think Broadband website

- 2.10. At its budget meeting in February 2016, the Council allocated £500k in its Capital Budget for the provision of broadband in the District. Initially this was intended to support further phases of the Fastershire roll out but this became unnecessary due to additional phases being added by Fastershire themselves. As of today, none of this budget has been used. This is, perhaps, not surprising given that the sensible strategy is to allow the maximum coverage to be delivered commercially and with Fastershire/BDUK funding before stepping in with District Council funding. £500k as a commitment from the Council's budget is a sizeable sum, but in terms of broadband delivery it is relatively small and needs to be used wisely. To put it into context, over £65 million of funding has been supplied by BDUK to Fastershire to date. In addition, there are considerations around State Aid and Best Value which have to be taken into account in this heavily-regulated environment. Officers are in discussions with Fastershire to devise a top up to their Community Broadband Grant Scheme to assist those communities where viability is an issue. A report will be brought to Cabinet setting out the details for approval. In the meantime, any requests for drawdown from the capital allocation will be subject to a business case being brought to Cabinet/Council for approval as necessary.
- 2.11. Gigaclear are currently on-site in Cirencester, delivering gigabit-capable broadband, and in Westonbirt. They are currently finalising their build schedule to complete outstanding areas in Cirencester. Once complete their network of live connections in the town will have increased from 1500 to 3500. They have highlighted the offer of a free connection within the build area for a Community Hub, such as a community centre or school, details of which can be found at [www.gigaclear.com/community-hub](http://www.gigaclear.com/community-hub).



- 2.12. Openreach are due to start upgrading their exchanges in the town in 2022 in order to make Cirencester a full fibre town. In addition, Openreach have recently pledged to deliver full fibre to a number of settlements in the District (Tetbury, Northleach, South Cerney, Bourton-on-the-Water, Fairford and Lechlade) by 2026. The exact timing and extent of their rollout is not known and it would be sensible to leave the allocation of £500k in place until it is clear whether there are any areas not covered by the rollout which will need public subsidy. Officers are in regular contact with both Gigaclear and Openreach, offering assistance where needed and encouraging them to complete their rollout as quickly as possible.
- 2.13. In May 2019, the Chancellor announced a £5 billion commitment to fund gigabit-capable broadband for the hardest to reach 20% of homes and businesses and in the Spending Review in November 2020 the budgetary phasing of the programme was confirmed. In December 2020, BDUK launched the [‘Planning for Gigabit in 2021’](#) consultation with communications network providers and local authorities followed by the [Project Gigabit Phase One Delivery Plan](#) in March 2021. An announcement on ‘procurement areas’ has been made by the Government in recent months, with Gloucestershire being in the third phase. It is likely that other routes will deliver improvements more quickly than through this plan.
- 2.14. The Government has made available £210 million for eligible rural areas to get Gigabit capable speeds. The Gigabit Broadband Voucher scheme offers up to £1500 per home or £3500 per business towards the cost of installation. In addition, there is £110 million available to connect public sector buildings like GP surgeries, libraries and schools in hard to reach areas.
- 2.15. Many authorities are now using planning policy to insist on the delivery of good quality broadband to new developments. The Cotswold District Local Plan adopted in 2018 makes reference to broadband in paragraph 11.9.4 but does not include a specific policy requiring the provision of broadband. It is recognised that this is seen by many homebuyers as a prerequisite of a purchase and will therefore be delivered by the market, but it is nonetheless something which could be encouraged or even required by a planning condition. This can be picked up by the current review of the Local Plan.
- 2.16. Mobile phone signal is a slightly separate but connected topic in terms of connectivity. There are areas of the District where coverage is poor. Officers are in regular contact with the main operators to encourage them to improve the position where needed. For example, BT have recently upgraded their mast near Fairford which should improve signal around that area. It is recognised that there is still some way to go to achieve universal coverage. It should also be noted that fibre is also needed for the rollout of 5G mobile coverage.



### **3. FINANCIAL IMPLICATIONS**

- 3.1. £500k was allocated in the 2016/17 Capital Budget for delivery of broadband across the District. That allocation remains in place and can be drawn down subject to specific business case approvals.

### **4. LEGAL IMPLICATIONS**

- 4.1. There are no direct legal implications arising from this report.

### **5. RISK ASSESSMENT**

- 5.1. There is a reputational risk to the Council if the capital allocation remains unspent for a long period of time. Equally there is a reputational risk if the money is not seen to be spent wisely. These risks are mitigated by requiring approval of individual business cases to enable drawdown of any funding.

### **6. EQUALITIES IMPACT (IF REQUIRED)**

- 6.1. The Council's Corporate Plan objective is to ensure the benefits of the internet and digital technologies are available to everyone in the District. The rollout of good quality broadband is an important element in the delivery of that objective.

### **7. ECOLOGICAL AND CLIMATE EMERGENCY IMPLICATIONS (IF REQUIRED)**

- 7.1. Good quality broadband enables residents to access services digitally and work from home effectively and in doing so reduces the need for travel, which has a positive effect on emissions.

### **8. ALTERNATIVE OPTIONS**

- 8.1. The Council could choose to reallocate some or all of the £500k capital budget for broadband provision. This is not recommended as it could result in good quality broadband not being available in some areas of the District which would otherwise have access to it.

### **9. BACKGROUND PAPERS**

- 9.1. None

(END)

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Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET – 10 JANUARY 2022
Report Number	AGENDA ITEM 15
Subject	USE OF THE INTERNET AND SOCIAL MEDIA IN INVESTIGATIONS AND ENFORCEMENT POLICY
Wards affected	All indirectly
Accountable member	<p>CLlr Joe Harris, Leader of the Council</p> <p>Email: <a href="mailto:Joe.Harris@cotswold.gov.uk">Joe.Harris@cotswold.gov.uk</a></p>
Accountable officer	<p>Emma Cathcart, Head of Service, Counter Fraud and Enforcement Unit</p> <p>Email: <a href="mailto:Emma.Cathcart@cotswold.gov.uk">Emma.Cathcart@cotswold.gov.uk</a></p>
Summary/Purpose	To present Cabinet with a new Use of the Internet and Social Media in Investigations and Enforcement Policy for adoption.
Annexes	Annex A – Use of the Internet and Social Media in Investigations and Enforcement Policy
Recommendation(s)	<p><i>That Cabinet:</i></p> <p><i>a) Approves and adopts the Policy attached to this report and;</i></p> <p><i>b) Authorise the Chief Executive to approve future minor amendments to the Policy in consultation with the Counter Fraud and Enforcement Unit, Legal Services and the Leader of the Council.</i></p>
Corporate priorities	Delivering our services to the highest standards.
Key Decision	YES
Exempt	NO
Consultees/ Consultation	Any Policies drafted or revised by the Counter Fraud and Enforcement Unit have been reviewed by Legal Services and have been issued to the Governance Group, the Council’s leadership team and Audit Committee for comment.



## **1. BACKGROUND**

- 1.1 In administering its responsibilities; this Council has a duty to prevent fraud and corruption, whether it is attempted by someone outside or within the Council such as another organisation, a resident, an employee or Councillor.
- 1.2 The Council is committed to an effective counter fraud and corruption culture, by promoting high ethical standards and encouraging the prevention and detection of fraudulent activities, thus supporting corporate and community plans.
- 1.3 The Counter Fraud and Enforcement Unit was tasked with reviewing and developing the Council's Policy and procedures on accessing the internet and social media for investigations and enforcement purposes.

## **2. MAIN POINTS**

- 2.1 The Council's Policies are based on the legislative requirements of the Regulation of Investigatory Powers Act 2000 (RIPA) and the Investigatory Powers Act 2016 (IPA) and the Codes of Practice relating to directed surveillance and the acquisition of communications data.
- 2.2 Whilst there has been a general decline in the use of covert surveillance activity, Councils have come under increased scrutiny in this area by Investigatory Powers Commissioner's Office (IPCO) during inspections and there are a number of recommendations in their annual reports, procedures and guidance.
- 2.3 IPCO confirms that, where inspections reveal activity - particularly with regard to intelligence gathering through the use of the internet and social media - evidence should demonstrate that consideration has been given to whether the activity could be considered surveillance and the appropriate authorisation sought.
- 2.4 Existing arrangements have been reviewed and the Policy for ensuring compliance has been developed, attached at Annex A. The Policy is generic and broad to ensure that the integrity of investigations and methods of detection are not revealed.
- 2.5 The procedure that derives from this Policy is a confidential document available to members of staff involved in investigation work who are authorised to undertake research and investigation using open source internet applications (as investigative tools) or other civil or criminal enforcement and recovery work.
- 2.6 Procedural matters are to be refined which will include details relating to operational application of the Policy and audit and oversight duties. Once agreed, a paragraph will be included within the Policy detailing this, which will provide assurances in relation to activities.



- 2.7 It is proposed that delegated authority is granted to Leader of the Council to approve minor changes, such as this, to the Policy.
- 2.8 The Council takes responsibility for ensuring its procedures relating to surveillance and the acquisition of communications data are continuously improved and all activity is recorded.
- 2.9 The Audit Committee considered and endorsed the Policy on 23 November 2021.

### **3. FINANCIAL IMPLICATIONS**

- 3.1 The adoption and approval of this Policy will support the Council's objectives in reducing crime and financial loss.

### **4. LEGAL IMPLICATIONS**

- 4.1 The Council is required to ensure that it complies with the Regulation of Investigatory Powers Act 2000, the Investigatory Powers Act 2016 and any other relevant legislation regarding investigations. Any authorisations for directed/covert surveillance or the acquisition of communications data undertaken should be authorised by the appropriate Officer and recorded in the Central Register.
- 4.2 The Council has a statutory obligation for enforcing a wide range of legislation, where it is necessary and proportionate to do so. Human Rights implications are a consideration of this type of activity and this is included within the Policies.

### **5. RISK ASSESSMENT**

- 5.1 The RIPA and IPA Policies demonstrate the Council's consideration of necessity, proportionality and public interest when deciding on surveillance activity or the decision to obtain personal communication data.

### **6. EQUALITIES IMPACT**

- 6.1 The application of the RIPA and IPA Policies and Procedures, to govern surveillance and the obtaining of personal communications data, minimises the risk that an individual's Human Rights will be breached. Furthermore it protects the Council from allegations of the same.



**7. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

7.1 None.

**8. BACKGROUND PAPERS**

8.1 Cabinet Report December 2019 - Regulation of Investigatory Powers Act 2000 Surveillance and Covert Human Intelligence Source Policy / Investigatory Powers Act 2016 Acquisition of Communications Data Policy.

(END)

Use of the Internet and Social Media for Investigations and Enforcement Policy

<b>Version Control</b>	
<b>Document Name:</b>	Use of the Internet and Social Media for Investigations and Enforcement Policy
<b>Version:</b>	1
<b>Responsible Officer:</b>	Emma Cathcart, Counter Fraud Unit
<b>Approved by:</b>	Cabinet / Executive Committee
<b>Date First Approved:</b>	TBC
<b>Next Review Date</b>	
<b>Retention Period:</b>	N/A

**Revision History**

Revision date	Version	Description

**Consultees**

Internal	External
Enforcement Lead Officers Governance Group Legal Services Corporate Management Audit / Audit and General Purposes / Audit and Governance / Audit, Compliance and Governance Committee	

**Distribution**

Name	
Enforcement Officers	

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# Use of the Internet and Social Media for Investigations and Enforcement Policy

## 1. INTRODUCTION

- 1.1 Online open source research is widely regarded as the collection, evaluation and analysis of material from online sources available to the public, whether by payment or otherwise, to use as intelligence and evidence.
- 1.2 The use of online open source Internet and Social Media research is a method of obtaining information to assist the Council with its regulatory and enforcement functions. It can also assist with service delivery issues. However, the use of the Internet and Social Media is constantly evolving and with it the risks, particularly regarding breaches of privacy under Article 8 of the Human Rights Act (HRA) 1998 and other operational risks.
- 1.3 The Council is a Public Authority in law under the HRA, and as such, the staff of the Authority must always work within this legislation. This applies to research on the Internet.
- 1.4 Researching, recording, storing, and using open source information regarding a person or group of people must be both necessary and proportionate and take account of the level of intrusion against any person. The activity may also require authorisation and approval by a Magistrate under the Regulation of Investigatory Powers Act (RIPA) 2000. To ensure that any resultant interference with a person's Article 8 Right (respect for private and family life) is lawful, the material must be retained and processed in accordance with the principles of the General Data Protection Regulation (GDPR) 2016 and Data Protection legislation.

## 2. SCOPE OF POLICY

- 2.1 This Policy and associated Procedure establishes the Council's approach to ensuring that all online research and investigations are conducted lawfully and ethically to reduce risk. It provides guidance to all staff within the Council, about legislative framework and implications associated with online Internet and Social Media research, when engaged in their official capacity. It will also ensure that the activity undertaken, and any evidence obtained, will withstand scrutiny.
- 2.2 This Policy takes account of the HRA, RIPA, Criminal Procedures and Investigations Act (CPIA) 1996, Data Protection legislation and regulations and National Police Chiefs Council (NPCC) Guidance on Open Source Investigation/Research.
- 2.3 This Policy and associated Procedure will be followed at all times and should be read, where required, with the RIPA Codes of Practice and any other legislation and relevant policies mentioned in this document. Should there be any queries advice can be sought from the RIPA Coordinator within the Counter Fraud Unit.
- 2.4 This Policy should not be exempt from disclosure under the Freedom of Information Act 2000.

**3. RISK**

- 3.1 Staff must be aware that any activity carried out using the Internet leaves a trace or footprint which can identify the device used, and, in some circumstances, the individual carrying out the activity. This may pose a legal and reputational risk to the Council if they are challenged by the subject of the research for breaching Article 8.1 of the HRA which states “Everyone has the right to respect for his private and family life, his home and his correspondence”.
- 3.2 Article 8.2 states “There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others”. It is therefore important that the Council can demonstrate that such activity was necessary and proportionate.
- 3.3 Monitoring of an individual’s social media or other open source information on a repeated or continuous basis could constitute surveillance by a Public Authority and fall with the realms of RIPA.
- 3.4 Breach of an individual’s rights under the HRA leaves the Council open to claims for financial compensation and the consequential reputational damage.
- 3.5 Failure to implement and follow a policy could risk compromising the integrity of evidence and any associated investigation.

**4. NECESSITY / JUSTIFICATION**

- 4.1 To justify the intrusion and interference with an individual’s privacy there must be a clear and lawful reason for the activity. Therefore the necessity for the research such as the criminal conduct that it is aimed to prevent or detect must be identified and clearly described. This should be documented with clear objectives. Should the research fall within RIPA activity, the RIPA authorisation will deal with the criteria for it to be lawful intrusion.

**5. PROPORTIONALITY**

- 5.1 Proportionality involves balancing the level of intrusion of the research on the subject and other innocent third parties who might be affected by it (collateral intrusion) against the need for the activity in operational terms.
- 5.2 The Officer must consider and document the benefit to carrying out the activity and how the benefit will outweigh the intrusion.
- 5.3 The activity will not be proportionate if it is excessive in the circumstances of the case or if the information which is sought could reasonably be obtained by other less intrusive means.
- 5.4 All such activity should be carefully managed to meet the objective in question and must not be arbitrary or unfair.

**6. PRIVATE INFORMATION**

- 6.1 Private information is defined in the RIPA Codes of Practice and states it “includes any information relating to a person’s private or family life. Private information should be taken generally to include any aspect of a person’s private or personal relationship with others, including family and professional or business relationships.”
- 6.2 Prior to, and during, any research Staff must take into account the privacy issues of any person associated with the research.
- 6.3 There are three broad categories of private information applicable here:
- 6.4 Category 1 - Viewing publically available postings or websites where the person viewing does not have to register a profile, answer a question, or enter any significant correspondence in order to view. For example, a typical trader’s website.
- 6.5 Category 2 - Viewing postings on social networks where the viewer has had to register a profile but otherwise there is no other restriction on access. This would include Facebook where there is no need to be accepted as a “friend” to view. For example a trader has a “shop window” on Facebook advertising a business and products.
- 6.6. Category 3 - Viewing postings on social networks which require a “friend” or similar status to view.

**7. REVIEWING THE ACTIVITY**

- 7.1 During the course of conducting the Internet open source research, the nature of the online activity may evolve. It is important that Staff continually assess and review their activity to ensure it remains lawful and compliant. Where it evolves into RIPA activity, the RIPA procedure should be followed. If in doubt, Staff should seek advice from the RIPA Coordinator within the Counter Fraud Unit.

**8. USE OF MATERIAL**

- 8.1 The material obtained from conducting open source Internet and Social Media research may be used as intelligence or evidence.
- 8.2 Any material gathered from the Internet during the course of a criminal investigation must be retained in compliance with the Criminal Procedure and Investigations Act (CPIA) Codes of Practice and all material stored in line with the General Data Protection Regulations (GDPR) data retention policies.

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**CABINET – 10 JANUARY 2022 - AGENDA ITEM 16**

**SCHEDULE OF DECISION(S) TAKEN BY THE LEADER OF THE COUNCIL AND/OR INDIVIDUAL CABINET MEMBERS**

Note: Further details regarding the decision(s) are available in the relevant Decision Notice(s).

<b>Cabinet Member</b>	<b>Meeting Date</b>	<b>Subject</b>	<b>Decision(s)</b>
Deputy Leader of the Council and Cabinet Member for Finance	30 November 2021	<p>This report seeks the approval of the Deputy Leader of the Council and Cabinet Member for Finance of twenty renewal applications for Discretionary Rate Relief submitted under Section 47 of the Local Government Finance Act 1988 for the financial years 2021/22.</p> <p>This report seeks the approval of the Deputy Leader of the Council and Cabinet Member for Finance of three new applications from one organisation and the renewal of eighteen applications for Discretionary Rate Relief submitted under Section 47 of the Local Government Finance Act 1988 for the financial years 2021/22.</p>	<p>The Deputy Leader of the Council and Cabinet Member for Finance agreed to grant Discretionary Rate Relief to 16 of the applications outlined in the report from a-p.</p> <p>The four applications outlined at q-t were not granted Discretionary Rate Relief due to the reserves held by the respective entities.</p> <p>The Deputy Leader of the Council and Cabinet Member for Finance agreed to grant Discretionary Rate Relief to 15 of the applications outlined in the report from a-o.</p> <p>The three applications outlined at q-s were not granted Discretionary Rate Relief due to the reserves held by the respective entities.</p> <p>The Cabinet Member did not take a decision relating to the Progressive Farming Trust as further information was required.</p>

Cabinet Member	Meeting Date	Subject	Decision(s)
Deputy Leader of the Council and Cabinet Member for Finance	2 December 2021	<p>To determine an application for Discretionary Council Tax discount submitted under Section 13A of the Local Government Finance Act 1992, as amended.</p> <p>This report seeks the approval of the Deputy Leader of the Council and Cabinet Member for Finance of an application for Discretionary Council Tax discount submitted under Section 13a of the Local Government Finance Act 1992, as amended.</p>	<p>The Cabinet Member considered the recommendations of the Officer and resolved to accept the recommendation to refuse the application for a Discretionary Council Tax discount.</p> <p>The Cabinet Member considered the recommendations and resolved that the application for a discretionary relief for the council tax of £286.85 should be approved in recognition of the difficulties that the applicant had experienced in the management of his council tax account.</p>
Cabinet Member for Development Management and Licensing	8 December 2021	This report recommends that the Cabinet Member for Development Management and Licensing considers the referendum result for South Cerney, and should it have received more than 50% of votes cast in its favour, agrees to make the plan.	<b>RESOLVED</b> That the Cabinet Member for Development Management and Licensing agreed to make the Plan due to 90.9% of the referendum votes being cast in favour.
Cabinet Member for the Environment, Waste and Recycling	20 December 2021	This report recommends that the Cabinet Member for the Environment, Waste and Recycling agrees that the renewed PSPO for Dog Fouling be approved for a further three years effective January 2022.	<b>RESOLVED</b> That the Cabinet Member for the Environment, Waste and Recycling considered the report and agreed that the renewed PSPO for Dog Fouling be approved for a further three years effective January 2022.

(END)