COTSWOLD DISTRICT COUNCIL

Monday, 4 September 2023

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CABINET

A meeting of the Cabinet will be held at Council Chamber - Trinity Road on **Tuesday, 12 September 2023 at 5.00 pm.**



Rob Weaver
Chief Executive

To: Members of the Cabinet
(Councillors Joe Harris, Mike Evemy, Claire Bloomer, Tony Dale, Paul Hodgkinson, Juliet Layton, Mike McKeown 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 5 - 20)
To approve the minutes of the previous meeting held on 17 July 2023.

4. **Leader's Announcements**

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 one minute each and relate to issues under the Cabinet's remit. At any one meeting no person may submit more than two questions and no more than two such questions may be asked on behalf of one organisation.

The Leader will ask whether any members of the public present at the meeting wish to ask a question and will decide on the order of questioners.

The response may take the form of:
   a) a direct oral answer;
   b) where the desired information is in a publication of the Council or other published work, a reference to that publication; or
   c) where the reply cannot conveniently be given orally, a written answer circulated later to the questioner.

6. **Member Questions**
No Member Questions have been submitted prior to the publication of the agenda.

A Member of the Council may ask the Leader or a Cabinet Member a question on any matter in relation to which the Council has powers or duties or which affects the Cotswold District. A maximum period of fifteen minutes shall be allowed at any such meeting for Member questions.

A Member may only ask a question if:
   a) the question has been delivered in writing or by electronic mail to the Chief Executive no later than 5.00 p.m. on the working day before the day of the meeting; or
   b) the question relates to an urgent matter, they have the consent of the Leader to whom the question is to be put and the content of the question is given to the Chief Executive by 9.30 a.m. on the day of the meeting.

An answer may take the form of:
   a) a direct oral answer;
   b) where the desired information is in a publication of the Council or other

published work, a reference to that publication; or

c) where the reply cannot conveniently be given orally, a written answer circulated later to the questioner.

7. **Endorsement of the Cotswolds National Landscape Management Plan 2023 – 2025** (Pages 21 - 104)

Purpose

To seek the Council's endorsement of the Cotswolds National Landscape (Area Of Outstanding Natural Beauty - AONB) Management Plan 2023 – 2025.

Recommendations

That Cabinet resolves to:

1) Note the content and aspirations of the Cotswolds National Landscape Management Plan 2023–2025 and recognise its importance in supporting and informing the following:

- part of the evidence base for the review of the Local Plan;
- part of the evidence base for the preparation of Neighbourhood Development Plans;
- part of the evidence base for the preparation and implementation of relevant Council strategies, policies and projects;
- the determination of planning applications (where compatible with relevant Local Plan and national policy)by acting as a material consideration; and
- the development and delivery of the Council's services and activities.

8. **Review of the Cotswold District Local Plan housing requirement** (Pages 105 - 170)

Purpose

To recommend to Full Council to approve the Review of the Cotswold District Local Plan 2011-2031 Housing Requirement, which finds that the local housing need of the district has not changed significantly and that the minimum housing requirement provided by the Cotswold District Local Plan does not require updating.

Recommendation

That Cabinet resolves to:

1) Recommend to Full Council to approve the review of the Cotswold District Local Plan 2011-2031 housing requirement.

9. **Employment and Health and Safety Policies** (Pages 171 - 318)

Purpose

To update the Cabinet relating to the refresh of all Human Resources and Health & Safety policies for CDC.

Recommendations

That Cabinet resolves to:

1) Agree the twenty-six employment policies and the Health & Safety Policy included in Annex A.
2) Delegate authority to the Chief Executive to approve subsequent amendments to any Cotswold District Council employment policies that may be necessary in line with legal changes and best practice to ensure the Council's policies remain compliant.

10. **Council Priority and Service Performance Report - 2023-23 Quarter One** (Pages 319 - 396)

Purpose

To provide an update on progress on the Council's priorities and service performance.

Recommendations

That Cabinet resolves to:

1) Note overall progress on the Council priorities and service performance for 2023-24 Q1.

11. **Financial Performance Report Quarter One - 2023/24** (Pages 397 - 446)

Purpose

This report sets of the latest budget monitoring position for the 2023/24 financial year.

Recommendations

That Cabinet resolves to:

1) Review and note the financial position set out in this report
2) Endorses the recommendation in paragraph 8.3 that the Cabinet Transformation Working Group review in-year opportunities with Publica and Ubico and provide Cabinet with an update in November on options to mitigate the forecast financial position.

12. **Schedule of Decisions taken by the Leader of the Council and/or Individual Cabinet Members** (Pages 447 - 448)

Purpose

To note the individual decisions taken by Cabinet Members.

13. **Issue(s) Arising from Overview and Scrutiny and/or Audit and Governance**

(END)

Cabinet
17/July2023

Minutes of a meeting of Cabinet held on Monday, 17 July 2023.

Councillors present:

Joe Harris	Mike Evemy	
Tony Dale	Lisa Spivey	Paul Hodgkinson
Juliet Layton	Claire Bloomer	Mike McKeown

Officers present:

Robert Weaver, Chief Executive
David Stanley, Deputy Chief Executive and Chief Finance Officer
Andrew Brown, Democratic Services Business Manager
Ana Prelici, Democratic Services Officer
Jon Dearing, Assistant Director for Resident Services
Claire Locke, Assistant Director for Property and Regeneration
Chris Crookall-Fallon, Head of Climate Action
Ciaran Okane, Senior Procurement Business Partner
Maria Wheatley, Shared Parking Manager Officer

Observers:

Councillor Nikki Ind

138 Apologies

There were no apologies for absence.

139 Declarations of Interest

There were no declarations of interest from Members or Officers.

140 Minutes

The following amendments to the minutes were tabled by the Deputy Leader;

- Minute 128 and 129- Councillor Mike McKeown was listed as voting for and absent, the correct record should only list a 'for' vote
- Minute 130- The resolution should be clarified as 'three years with an optional one year extension'
- Minute 132 – incorrect term was used, 'member referral panel' should be 'member review panel'

RESOLVED that Cabinet APPROVE the minutes, subject to the amendments, as a correct record of the meeting held on the 9th of June.

Voting record For- 7, Against 0, Abstentions 1, Absent 0

For	Against	Absent	Abstentions
Claire Bloomer			Juliet Layton
Joe Harris			
Lisa Spivey			
Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

141 Chair's Announcements

The Leader stated that they had attended, alongside a number of Councillor and Officer colleagues, the Royal International Air Tattoo at RAF Fairford. The Leader noted that this was the one of the biggest events in the South West, second only to the Glastonbury Festival. The Leader thanked those who had organised it, and the support of the Local Community in hosting it.

The Leader stated that armed forces Day was marked in June, by the raising of the Armed Forces Flag at the Trinity Road Offices. The Leader thanked the Armed Forces for their work to protect civilians both at home and abroad.

The Leader also recognised Pride Month, held in June, and the second annual Cirencester Pride event. The Leader stated that Pride Month highlights the need to celebrate and protect the rights of LGBT people.

The Leader stated that the Changing Places toilets in the Abbey Grounds had been opened and thanked the Economic Development Lead for their work on the project.

The Leader expressed gratitude for his re-election as a Vice-Chair of the Local Government Association (LGA), and thanked members who had attended the recent LGA conference.

142 Public Questions

There were no public questions.

143 Member Questions

A member question had been submitted to Councillor Tony Dale, Cabinet Member Economy and Council Transformation, from Councillor Dilys Neill. The Democratic Services Officer explained that this question had been submitted before the 5.00pm deadline, but after the publication of the agenda, so had been circulated as a supplement;

“With reference to item 14 on the agenda. While Stow Town Council has been aware that funding for the Visitor Information Centre was being reviewed, it was only on 14th July that the clerk was notified that the recommendation to Cabinet would be for funding to be withdrawn from September. This does not give time for this to be discussed with all the Town Councillors & for a considered response to be returned.

In Stow, the VIC is housed within the library & funding for the VIC contributes to the viability of the library. Your report shows that in 2022, there were on average about 900 visitors per week to the library / VIC. Withdrawal of funding for the VIC means that it is likely that the library will have to reduce or even close its services.

What discussions have taken place between CDC, GCC who are responsible for the library & Cotswold Tourism to ensure that these popular services (library & VIC) remain viable?"

The following written response was provided and circulated after the meeting;

"1. Officers are sorry for the short notice which has arisen from the unusually small period of time between Cabinet and Council meetings to confirm this funding. VICs were advised funding by grant would only last for a further 18 months in 2021
2. VIC Grant funding goes to Stow Town Council and is not intended to subsidise Library services
3. Visitors have been migrating to digital services since smart phones emerged and COVID accelerated this change. VICs were encouraged to become more digital but so far the changes have been limited.

In common with Visitor Economy support across the Cotswolds for all our Towns and Parishes we continue to operate Cotswolds.com which attracts over 1.5million visitors per year."

144 Rural England Prosperity Fund

The purpose of the report was to inform Cabinet of the approval of the Council's Rural England Prosperity Fund submission and to endorse the approach the Council is taking to allocating the funding.

The Cabinet Member for the Economy and Council Transformation introduced the item, outlining how funds would be distributed. The Cabinet explained that the fund had been allocated by Government in two tranches of around £200,000 and around £550,000.

The Cabinet Member explained that the fund was intended to be complementary to the UK Shared Prosperity Fund (UKSPF), which has previously been reported to Cabinet.

The Cabinet Member stated that the distribution of these funds would be focused on helping rural businesses and communities keep up with more urban areas particularly in regards to connectivity. The funds would be distributed as follows; around £400,000 for the funding of grants to businesses to improve productivity in rural economies, and around £300,000 for community projects (including approximately £100,000 for active travel, £150,000 for heritage buildings and the remainder for community halls and buildings).

The Cabinet Member stated that, following consultation with businesses, the amount to be granted to an individual business would be between £5,000 and £50,000, representing match funding of 50%.

The Cabinet Member stated that the amount for village halls and communities would be between £2,000 to £10,000, with 20% match funding.

Members discussed the application processes, and the Cabinet Member stated that the application process would be as simple as possible. The application process would commence in around September or October and would be open for about six to eight weeks.

The Cabinet Member explained that village halls could apply to the fund for anything that would constitute a one-time improvement, such as improving wifi connectivity or installing solar panels, to name a few examples.

The recommendations were proposed by Councillor Tony Dale and seconded by Councillor Paul Hodgkinson.

RESOLVED: That Cabinet

1) NOTE the approval of the Council's submission to the Government for the Rural England Prosperity Fund (REPF);
2) NOTE that the first year allocation of £191,073 has been approved, with the second year allocation of £573,219 approved subject to compliance with the Government's Memorandum of Understanding;
3) ENDORSE the approach to allocating the funding as set out in section 4;
4) DELEGATE AUTHORITY to the Chief Executive to agree the details of the REPF grant schemes and to make final decisions on funding in consultation with the Cabinet Member for Economy and Council Transformation, having regard to the recommendations of the Assessment Panel;
5) DELEGATE AUTHORITY to The Chief Executive in consultation with the Cabinet Member for Economy and Council Transformation to agree arrangements and enter into a contract with a third party provider for administering the grant schemes and providing support to businesses, community groups and Town and Parish Councils in delivering their projects.

Record of Voting – For: 8, Against 0, Abstention 0, Absent: 0

For	Against	Absent	Abstentions
Claire Bloomer			
Joe Harris			
Juliet Layton			
Lisa Spivey			
Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

145 Planned Expenditure of the Homelessness Prevention Grant - Homes for Ukraine top up 2023-2024

The purpose of the report was to consider the planned expenditure of the Homelessness Prevention Grant – Homes for Ukraine top up 2023/2024.

The Leader of the Council introduced the item and highlighted how the funds would be used. The Leader explained that the Housing and Homelessness team were experiencing increased pressures following the pandemic, cost of living crisis, and that the displaced people following the war in Ukraine had worsened this.

The Leader stated that given the short term nature of the fund recruiting additional staffing through usual channels is unlikely to be successful. It was therefore proposed that a new post be created for the duration of the Grant period, Resettlement and Complex Needs Manger, which would be shared across the Publica Authorities.

The costs would be broken down as follows;

- Resettlement and Complex Needs Manager (to be shared across Publica with Cotswold District Council having a 25% share - £11,250
- Additional Homes for Ukraine family and prevention support staff- £35,000
- Flexible prevention grant to include, but not limited to rent in advance, deposits, tenancy set up, furniture, white goods or emergency accommodation costs- £109,716

Members stated that it was uplifting to see the local community welcome refugees from Ukraine, and asked if the number of refugees was known. The Chief Executive stated that there were a total of 197 refugees from Ukraine in 72 households.

Members asked whether the manager post would need to be approved at the other Publica councils. The Business Manager for Housing stated that the proposal had already been approved by the other Councils.

The recommendations were proposed by Councillor Joe Harris and seconded by Councillor Lisa Spivey, who stated that prevention was key to resolving housing issues, and thanked the Housing and Homelessness team for their work.

RESOLVED: That Cabinet

1) APPROVE the expenditure detailed within section 3 of this report

2) APPROVE the delegation of any amendments to these allocations to the Business Manager - Housing in consultation with the Leader of the Council and the Deputy Chief Executive Officer subject to compliance with the ring fenced grant conditions

3) APPROVE the delegation of decisions on any other uplifts or grants that may be given over the financial years 2023-24 to address increased demands on the Housing Service to the Business Manager - Housing in consultation with the Leader of the Council and the Deputy Chief Executive Officer subject to compliance with the ring fenced grant conditions

Record of Voting – For: 8, Against 0, Abstention 0, Absent: 0

For	Against	Abstentions	Absent
Claire Bloomer			
Joe Harris			
Juliet Layton			
Lisa Spivey			
Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

146 Infrastructure Funding Statement 2022/23

The purpose of the report was to notify Cabinet of the Infrastructure Funding, which provides an overview of all Community Infrastructure Levy (CIL) and Section 106 monies collected, held and spent.

The Cabinet Member for Development Management and Regulatory Services introduced the item.

The Cabinet Member explained the breakdown of the funds and explained that a copy of the report would be sent to all Town and Parish Councils after the meeting.

The Chief Executive added that links to information about CIL would be included in the minutes;

https://www.cotswold.gov.uk/media/do4ou1ch/cil-town-and-parish-councils-guide.pdf

https://www.cotswold.gov.uk/planning-and-building/community-infrastructure-levy/

RESOLVED: That Cabinet

1) NOTE the publication of the Infrastructure Funding Statement

147 Updated Procurement and Contract Management Strategy

The purpose of the report was to present an updated draft Procurement and Contract Management Strategy for comment and consideration by Cabinet.

The Deputy Leader and Cabinet Member for the Finance introduced the item, explaining that the purpose of the item was to increase the social benefit of the procurement Publica undertakes on the Council's behalf. The Cabinet Member explained that the report had been looked at by the Overview and Scrutiny Committee, which had not made any recommendations, but clarified that the strategy was for how Publica procures on behalf of the partner Councils.

The Senior Procurement Business Partner explained that mandatory training for all staff members who undertake procurement would take place. The Cabinet also asked that training on procurement be extended to Members where appropriate.

The Cabinet Member for Finance mentioned that a figure was missing on page 81 of the agenda reports pack. The Senior Procurement Business Partner clarified that the Publica Councils have a combined annual spend of £26m.

Members welcomed the proposal, and sought further information on how the Council could ensure the strategy would deliver social value. The Senior Procurement Business Partner

stated each contract was dealt with on a case by case basis, and that this could be monitored through contract management.

The recommendation was proposed by Councillor Mike Evemy and upon being seconded, went to a vote.

RESOLVED: That Cabinet

1) APPROVE the updated Procurement and Contract Management Strategy and recommends it for approval by Council

Record of Voting – For: 8, Against 0, Abstention 0, Absent: 0

For	Against	Absent	Abstentions
Claire Bloomer			
Joe Harris			
Juliet Layton			
Lisa Spivey			
Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

148 Council Priority and Service Performance Report - 2022-23 Quarter 4

The purpose of the report was to provide an update on progress on the Council's priorities and service performance

The Chief Executive introduced the report, and highlighted the key points within the report;

- A revised Council Tax Hardship fund was launched to help those affected by the Cost of Living Crisis
- Council Tax Collection rates had previously declined due to the Cost of Living Crisis, but this had now improved, at a rate of 98%
- Business rates collection had improved, with a reduction in recovery rates
- There had been a decline in the number of planning applications received, which resulted in a decrease of income from pre-application advice
- The next Council Priority and Service Performance Report would include a broader suite of performance indicators.

The Deputy Chief Executive then addressed the financial elements of the report.

- A new method of benchmarking reporting would be included in future reports, including comparisons from CIPFA neighbours.
- The Asset Management Strategy would be presented to Cabinet in September.

Members made reference to the increase in Gym membership by 20%, and welcomed the new leisure provider who would be commencing their contract in 10 days' time.

Members stated that Business Rates collections would likely be a challenge due to the high rates of inflation, and encouraged officers to ensure that businesses are being helped to survive amidst this.

The Deputy Leader stated that the report had been scrutinised by the Overview and Scrutiny Committee the previous week. The Committee did not make any recommendations to Cabinet but had discussed the performance indicators.
Members made reference to the increase in Gym membership by 20%, and welcomed the new leisure provider who would be commencing their contract in 10 days time.

Members stated that Business rate collections would likely be a challenge due to the high rates of inflation, and encouraged officers to ensure that businesses are being helped to survive amidst this.

The Deputy Leader stated that the report had been scrutinised by the Overview and Scrutiny Committee the previous week. The Committee did not make any recommendations to Cabinet but had discussed the performance indicators.

RESOLVED: That Cabinet

1) NOTE overall progress on the Council priorities and service performance for 2022-23 Q4 and the post reporting period events.

149 2022/23 Final Revenue and Capital Outturn Report

The purpose of the report was to set out the outturn position for the 2022/23 financial year.

The reported outturn of an adverse variance of £1.274m against budget is in line with forecast outturn position reported at Q3 of £1.220m.

The Deputy Leader highlighted that the previous budget was before the inflationary pressures resulting from the war in Ukraine. Therefore, the expenditure on pay settlements was £0.3m higher than budgeted on Publica staff, and £0.5m higher on Ubico staff. The Deputy Leader also highlighted pressures due to fuel, electricity and gas costs increasing, although noted that more treasury management income than expected had been generated from interest rates increasing.

The Deputy Chief Executive highlighted Annex B of the report, and the transfer from the general fund, which highlighted the difference between the Medium Term Financial Strategy and the revised budget.

RESOLVED: That Cabinet

1) NOTE the financial position set out in this report.
2) APPROVE the carry forward of unspent capital budget included in table 5 of £1.114m into the 2023/24 Capital Programme.

Record of Voting – For: 8, Against 0, Abstention 0, Absent: 0

For	Against	Absent	Abstentions
Claire Bloomer			
Joe Harris			

Juliet Layton			
Lisa Spivey			
Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

150 2023/24 Revenue and Capital Financial Performance Report - High Risk budgets

The purpose of the report was to provide members with an initial view on the financial challenge for the Council in the current financial year.

The Deputy Leader and Cabinet Member for Finance introduced the item. The Deputy Leader stated that the Cabinet Transformation Working Group had been focussed on delivering savings.

The report stated that the Council had faced several external budget pressures throughout 2022/23 which would continue to impact the Council's finances over the medium-term. There remained significant uncertainty around inflation and interest rates which exerted an influence over the Council's budget both directly and indirectly.

The Deputy Leader explained that Cabinet was therefore asked to agree to establish a new "Treasury Management Risk" earmarked reserve.

The Deputy Chief Executive and Chief Finance Officer stated that budget risks and savings targets were addressed in the report. The General Fund revenue budget included savings targets of £0.250m for Publica and Ubico.

Members noted that car parking revenue was ahead of budget, and welcomed this.

The recommendations were proposed by Councillor Mike Evemy and seconded by Councillor Joe Harris.

RESOLVED That Cabinet

1) NOTE the initial view on high-risk budgets/financial performance
2) AGREE to establish a new earmarked reserve "Treasury Management Risk" as set out in para 5.13 of this report

Record of Voting – For: 8, Against 0, Abstention 0, Absent: 0

For	Against	Absent	Abstentions
Claire Bloomer			
Joe Harris			
Juliet Layton			
Lisa Spivey			
Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

151 Review and future support for grant maintained visitor information centres

The purpose of the report was to advise Cabinet of the outcome of an 18 month review of the four grant-aided Visitor Information Centres (VICs) and their performance against Service Level Agreement measures. To consider future support for existing grant-aided VICs.

The Leader of the Council stated that there was a mistake in the agenda, as the figure should be £6,000, as in the report.

The Cabinet Member for the Economy and Council Transformation introduced the item, and stated that the Council did not own VICs. The Cabinet Member stated that the report concerned grant funding to Visitor Information Centres owned by external parties.

The Cabinet Member stated that only a fraction of tourists to popular Cotswold destinations utilised VICs, while Cotswolds.com had 1.9 million visitors in 2022.

Bourton on the Water VIC had made steps to encourage digital engagement through facilitating coach bookings, and the report therefore recommended forward funding of £6,000 associated with the costs of this.

Members stated that there were some other examples of VICs that had diversified and modernised, Cirencester VIC was noted due to their work selling local products.

The recommendations were proposed by Councillor Tony Dale and seconded by Councillor Mike Evemy.

RESOLVED that Cabinet:

1) AGREE forward funding from the Council Priorities Fund (CPF) of £6,000 for a transitional period to the end of December 2023 for costs associated with Bourton on the Water VIC running the coach booking system.

Record of Voting – For: 8, Against 0, Abstention 0, Absent: 0

For	Against	Absent	Abstentions
Claire Bloomer			
Joe Harris			
Juliet Layton			
Lisa Spivey			
Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

152 Commercial Solar Photovoltaic Installations on Council Assets

The purpose of the report was to seek agreement to invest in the installation of solar PV on the roofs of buildings owned and in some cases leased by the Council based on the business

cases set out within this report and to agree to enter into a contract with the preferred contractor for the installation of the solar PV.

The proposal was introduced by the Deputy Leader and Cabinet Member for the Finance. The Cabinet Member for Climate Change and Sustainability stated that the proposal demonstrated the Council's commitment to addressing climate change.

The Cabinet Member for Climate Change and Sustainability made reference to the wildfires across Europe, which highlighted the timeliness of the proposal.

The report highlighted that making an investment in solar PV would contribute to reducing the climate impact of electricity consumption within the Council's estate (both Council-occupied and tenanted). It was stated in the report that benefits to the Council would include:

- delivering a part of its commitment to becoming net zero carbon in operation by 2030,
- generating a return on investment (as per the financial model in the business case annex),
- fulfilling one of the stated purposes of the Cotswold Climate Investment (The Council's Community Municipal Investment Fund) and
- supporting a tenant organisation in their own carbon reduction journey.

The recommendations were proposed by Councillor Mike Evemy and seconded by Councillor Mike McKeown.

RESOLVED that Cabinet:

1) RECOMMEND that Full Council should agree to proceed with the investment in roof mounted solar PV based on the business cases in this report, and that,

2) The Council seeks to enter into sale agreements, for the electricity generated, with the tenants, with the terms of these agreements and the decision to proceed with some but not all tenants delegated to the Deputy Chief Executive Officer in consultation with the Deputy Leader and Cabinet Member for Finance.

3) AGREE to enter into contract with the preferred contractor identified in Annex A, for the provision and installation of Solar PV and related equipment.

4) DELEGATE to the Deputy Chief Executive Officer the decision to exclude any tenanted sites based on further due diligence associated with energy usage or vulnerability around continued tenant occupation.

5) DELEGATE to the Deputy Chief Executive Officer the decision to adjust the indicative electricity sale price to tenants as long as changes to the projected project returns are in-line with projections contained within this report.

6) RECOMMEND to Council to set aside funding for contingency costs of £27,000 from the Council Priorities Fund with delegation to the Deputy Chief Executive Officer to allocate subject to the business case still being viable or expenditure being unavoidable due to structural condition of the building.

7) AGREE to allocate revenue funding of £3,400/year for a part-time shared Energy Manager post and include in the next budget update. Noting that this will be funded from Solar PV income.

Record of Voting – For: 8, Against 0, Abstention 0, Absent: 0

For	Against	Absent	Abstentions
Claire Bloomer			
Joe Harris			
Juliet Layton			
Lisa Spivey			
Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

153 Decision to provide a Cotswold residents' group-buying scheme for solar PV panels

The purpose of the report was to obtain Cabinet approval for the Council to enter an arrangement with a company, Switchd Ltd trading as MakeMyHouseGreen, to co-brand and promote a district-wide domestic rooftop solar group purchasing scheme.

The scheme's aim was to increase the uptake of solar PV in the district by building on the trust that residents have in the Council as a statutory body, and reducing risk, increasing confidence and ensuring cost-effectiveness for homeowners considering the purchasing rooftop solar PV and battery systems.

The Cabinet Member for Climate Change and Sustainability introduced the report, highlighting that the proposal could allow residents to significantly reduce their carbon footprint.

Members stated that the scheme would assure residents that they are choosing a trusted provider, and thereby encourage residents to take up the scheme.

Members discussed that social tenants could be involved through their housing association.

The recommendations were proposed by Councillor Mike McKeown and seconded by Councillor Lisa Spivey, who highlighted the value of delivering the scheme with through what she hoped would be a trusted partnership.

RESOLVED That Cabinet

1) APPROVE the Council's engagement with Switchd Ltd to run a district-wide householder support programme for purchasing solar panels.
2) DELEGATE AUTHORITY to the Head of Climate Action, in consultation with the Cabinet Member for Climate Change and Sustainability, CDC's Heritage and Design Manager, Publica's Business Manager for Communications and Marketing and Publica's Head of Legal Services to enter into a contract with Switchd Ltd and run a programme of Council communications to support the scheme

Record of Voting – For: 8, Against 0, Abstention 0, Absent: 0

For	Against	Absent	Abstentions
Claire Bloomer			
Joe Harris			
Juliet Layton			
Lisa Spivey			
Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

154 Schedule of Decisions taken by the Leader of the Council and/or Individual Cabinet Members

The purpose was to note the Schedule of Decisions taken by the Leader of the Council and Individual Cabinet Members.

The Deputy Leader and Cabinet Member for Finance explained that a decision-making meeting had taken place on the 30th June 2023.

The Deputy Leader asked that the wording in the Schedule of Decisions be amended to remove the word 'dowry' due to its sexist connotations.

RESOLVED: That Cabinet NOTE the schedule of decisions.

155 Issue(s) Arising from Overview and Scrutiny and/or Audit

There were no issues arising from the Overview and Scrutiny or Audit and Governance Committees.

156 Matters exempt from publication

If Cabinet wished to exclude the press and the public from the meeting during consideration of any of the items on the exempt from publication part of the agenda, it was necessary for Cabinet to pass a resolution in accordance with the provisions of Paragraph 4(2)(b) of the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012 on the grounds that their presence could involve the likely disclosure of exempt information as described in paragraph 3 of Schedule 12A of the Local Government Act 1972.

RESOLVED: To exclude the public from the meeting in accordance with the provisions of Paragraph 4(2)(b) of the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012 in order to discuss matters exempt from publication as described in paragraph 3 of Schedule 12A of the Local Government Act 1972, with the public interest in maintaining the exemption outweighing the public interest in disclosing the information.

Record of Voting – For: 8, Against 0, Abstention 0, Absent: 0

For	Against	Absent	Abstentions
Claire Bloomer			
Joe Harris			
Juliet Layton			
Lisa Spivey			

Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

157 Exempt annexes for Item 15

These were not discussed.

158 Exempt annexes for Item 16

These were not discussed.

159 Cleaning and Maintenance of Public Conveniences

The purpose to provide a summary of options for the delivery of the public convenience cleaning and maintenance service

Cabinet members stated that they considered that Danfo provided a good service, but that the contract would only be only extended for a year to allow officers to review and evaluate the overall service provision.

Cabinet members discussed the importance of providing a commercially viable service, which could be entirely maintained through customers paying for entry. It was hoped that this would result in a commercially viable service that was also a good for customers.

The Cabinet also stated that they hoped to introduce card readers in addition to the existing cash payment, to provide more payment options,

The recommendations were proposed by Councillor Mike Evemy and seconded by Councillor Tony Dale.

RESOLVED that Cabinet:
1) APPROVE a further one-year extension under a contract waiver for the cleaning and maintenance of Public Conveniences with Danfo.
2) APPROVE the reduced specification/service requirements for the one-year extension.
3) REQUEST OFFICERS to conduct an in-depth review of service provision to be carried out during the period of extension to inform future contract options.

Record of Voting – For: 8, Against 0, Abstention 0, Absent: 0

For	Against	Absent	Abstentions
Claire Bloomer			
Joe Harris			
Juliet Layton			
Lisa Spivey			
Mike Evemy			
Mike McKeown			
Paul Hodgkinson			
Tony Dale			

The Meeting commenced at_6.00 pm and closed at 8.26 pm

Chair

(END)

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COTSWOLD DISTRICT COUNCIL

Council name	**COTSWOLD DISTRICT COUNCIL**
Name and date of Committee	**Cabinet 12th September 2023**
Subject	**Endorsement of the Cotswolds National Landscape Management Plan 2023 – 2025.**
Wards affected	All wards within the Cotswolds National Landscape
Accountable member	Cllr Juliet Layton, Cabinet Member for Planning and Regulatory Services Email: juliet.layton@cotswold.gov.uk
Accountable officer	Charlie Jackson, Assistant Director – Planning and Sustainability Email: democratic@cotswold.gov.uk
Report author	Sophia Price, Heritage and Design Manager Email: democratic@cotswold.gov.uk
Summary/Purpose	To seek the Council's support for the Cotswolds National Landscape (Area Of Outstanding Natural Beauty - AONB) Management Plan 2023 – 2025.
Annexes	Annex A – Cotswold National Landscape Management Plan 2023-2025
Recommendation(s)	*That Cabinet resolves to:* *1) Note the content and aspirations of the Cotswolds National Landscape Management Plan 2023–2025 and recognise its importance in supporting and informing the following:* • *part of the evidence base for the review of the Local Plan;* • *part of the evidence base for the preparation of Neighbourhood Development Plans;* • *part of the evidence base for the preparation and implementation of relevant Council strategies, policies and projects;* • *the determination of planning applications (where compatible with relevant Local Plan and national policy)by acting as a material consideration; and* • *the development and delivery of the Council's services and activities.*

Corporate priorities	• Respond to the climate crisis • Provide socially rented homes • Make our local plan green to the core • Support health and wellbeing • Enable a vibrant economy
Key Decision	N/A
Exempt	No
Consultees/ Consultation	The Cotswolds National Landscape Board (Cotswolds Conservation Board) have undertaken extensive consultation with a broad range of stakeholders, including Cotswold District Council, in the preparation of the management plan.

1. EXECUTIVE SUMMARY

1.1 The Cotswolds National Landscape Management Plan is a key mechanism for conserving and enhancing the natural beauty of the Cotswolds National Landscape (CNL) as well as increasing the understanding and enjoyment of the National Landscape's special qualities. The CNL was previously and legally is still referred to as the Cotswolds Area of Outstanding Beauty.

1.2 The new Management plan and its vision place increased emphasis on the climate and ecological emergencies as well as access to nature and the countryside. The evidence within the Plan and the policies will assist in decision making and the preparation of Council policies and projects.

2. BACKGROUND

2.1 The Cotswolds National Landscape Board adopted the Cotswolds National Landscape Management Plan 2023 -2025 in February 2023. The Plan is a statutory plan, under the provisions of section 89(1) of the Countryside and Rights of Way Act 2000[1] (CROW). If the CNL Board (the Board) was not charged with the requirement to produce a Management Plan the local authorities would collectively have to draft, consult and publish a plan.

[1] https://www.legislation.gov.uk/ukpga/2000/37/contents

2.2 Although the Board is the body responsible for preparing and publishing the Management Plan and will play an important role in its delivery, the policies of the Management Plan are also intended to guide the work of other stakeholders, such as the Council, in delivering the Management Plan's vision and outcomes.

2.3 Previous management plans (2008-2013 and 2013-2018) were endorsed by Cotswold District Council.

2.4 The plan runs for two years rather than the usual five. This is because significant national and local policy developments for protected landscapes are anticipated during this period, particularly with reference to climate action and the implementation of the Glover review on protected landscapes[2].

3. MAIN POINTS

3.1 The management plan sets out a clear vision (chapter 2) for the CNL, underpinned by three key issues –

- the Climate Emergency;
- nature's decline and the Ecological Crisis;
- health and societal change.

3.2 From this vision and the three key issues a series of policies have been developed to deliver the desired outcomes. Some of these policies will be delivered by the Board themselves and some are put forward to encourage others to deliver on the vision.

3.3 The policies are set out under 3 cross-cutting themes: 1) Climate change – mitigation and adaptation; 2) Natural and Cultural Capital; and 3) Working Together.

And under two other themes –

- CONSERVING AND ENHANCING. Influencing and delivering for landscape, nature and climate. This includes: Landscape; Geology; Local Distinctiveness; Tranquillity; Dark Skies; Historic environment and cultural heritage; Biodiversity and nature recovery; Rural land management; and Development and transport

2 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf

- INCREASING UNDERSTANDING AND ENJOYMENT. Ensuring access, learning and wellbeing opportunities are for everyone. This includes: Health and wellbeing; Access and recreation; and Sustainable tourism

3.4 A number of the policies are quite aspirational in nature and therefore may not be compatible with current Cotswold District Local Plan policies. Examples include management plan policy CC1 (climate change) which states that "All developments, should have a net zero operational carbon balance and 100% energy provided by low carbon sources. Alternatives to fossil fuel energy sources should be used" as well as policy CE7 (biodiversity). The Board hopes that these aspirational policies will aid in developing and evidencing new local plan policies. If the Management Plan is used as a material consideration in planning decisions, its policies would not over-ride those in the existing Cotswold District Local Plan when determining planning applications. However, they will help influence and shape the Council's Local Plan Partial Update and the ambition to be "green to the core".

3.5 The previous management plan (2018-2023) was not endorsed by the Council partly because of its emphasis on the Cotswolds becoming a National Park. The current management plan does not refer to that however it highlights the need for all stakeholders to work together to ensure that the proposals in the Glover Landscape Review, that were prioritised by the Government[3] are delivered – for example nature recovery and access to nature and the countryside.

4. ALTERNATIVE OPTIONS

4.1 The alternative option is not to note and recognise the importance of the Management Plan. This could be seen as a sign that the Council is not committed to meeting its duty under the CROW Act s.85 to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape (AONB).

5. FINANCIAL IMPLICATIONS

5.1 None

6. LEGAL IMPLICATIONS

6.1 None

7. RISK ASSESSMENT

[3] https://www.gov.uk/government/publications/landscapes-review-national-parks-and-aonbs-government-response

7.1 No risks identified

8. EQUALITIES IMPACT

8.1 No issues identified.

9. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

9.1 The Management Plan places considerable emphasis on the climate and ecological emergencies and use of the Plan will assist in addressing these.

10. BACKGROUND PAPERS

10.1 None

(END)

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COTSWOLDS NATIONAL LANDSCAPE MANAGEMENT PLAN 2023-2025

Cotswolds National Landscape Board
Fosse Way
Northleach
Gloucestershire GL54 3JH
Tel: 01451 862000
Website: www.cotswoldsaonb.org.uk

A note on terminology

In June 2020 the Cotswolds National Landscape Board decided to replace the term Area of Outstanding Natural Beauty (AONB) with National Landscape.

This plan uses the name Cotswolds National Landscape (CNL) for the area designated as the Cotswolds AONB. At times it is abbreviated to National Landscape.

AONB is still the legal designation and is used within this plan when referring to AONB's outside of the Cotswolds and the designation nationally.

The name used for the organisation associated with the designation is the Cotswolds National Landscape Board. At times this is abbreviated to National Landscape Board or The Board.

The legal name of the organisation remains the Cotswolds Conservation Board but this name is no longer used in most circumstances.

EXECUTIVE SUMMARY

The Cotswolds National Landscape Management Plan 2023-2025

The Cotswolds National Landscape Management Plan is a statutory plan, which sets out the vision, outcomes and policies for the management of the Cotswolds National Landscape for the period 2023-2025. These are summarised in the table overleaf.

The vision sets the overall context for the plan and was adopted in 2022 following consultation with stakeholders. The vison was drawn up in the light of three interlinked key issues:

- **Key Issue 1, The Climate Emergency**
- **Key Issue 2, Nature's decline and the Ecological Crisis**
- **Key Issue 3, Health and societal changes**

The plan goes on to define the special qualities of the National Landscape. These are the aspects of the area's natural beauty which make it distinctive and which are considered valuable, especially at a national scale. It is the impact of these key issues amongst others, on the special qualities that has informed the development of the plan's outcomes and polices.

The outcomes express the desired state of the National Landscape. They are arranged under three over-arching headings which reflect the National Landscape's purpose of designation (to conserve and enhance natural beauty) and the National Landscape Board's additional purpose (to increase understanding and enjoyment). These headings are illustrated further with three broad aims:

1. Cross Cutting Themes; **Tackling 21st century issues through progressive partnerships.**
2. Conserving and Enhancing Natural Beauty; **Influencing and delivering for landscape, nature and climate.**
3. Increasing Understanding and Enjoyment; **Ensuring access, learning and wellbeing opportunities are for everyone.**

When viewed together the outcomes paint a powerful picture of what the Cotswolds would be like if this plan's vision became a reality:

Outcome 1 - Climate Action: The National Landscape is a place that is mitigating and adapting to climate change, and has a clearly defined pathway towards Net Zero emissions.

Outcome 2 - Natural and Cultural Capital: The natural and cultural capital assets of the National Landscape - and the services which they provide – are better understood, conserved and enhanced.

Outcome 3 - Working Together: Through collaborative partnerships and a shared understanding, the purposes of the National Landscape and its Board are applied consistently across the whole area.

Outcome 4 - Landscape: The evolving landscape and much-loved character of the Cotswolds is better understood and at the heart of all we do and the decisions we make.

Outcome 5 - Local Distinctiveness: In a world of constant and rapid change, the local distinctiveness of the National Landscape is valued, conserved and enhanced.

Outcome 6 - Tranquillity: Noise pollution and visual disturbance are minimised to maintain tranquillity across the National Landscape.

Outcome 7 - Dark Skies: Fewer areas of the National Landscape are affected by light pollution.

Outcome 8 - Historic Environment and Cultural Heritage: The historic environment and cultural heritage of the National Landscape is better understood, conserved and enhanced.

Outcome 9 - Biodiversity and Nature Recovery: There is concerted unified action for a widespread recovery of nature - conserving, restoring and enhancing a connected mosaic of distinctly Cotswolds habitats and species.

Outcome 10 - Rural Land Management: Land management conserves and enhances the natural beauty of the National Landscape whilst balancing the competing pressures of recovering nature, tackling climate change, food production, supporting livelihoods and public access.

Outcome 11 - Development and Transport: Development and transport schemes positively contribute to the purposes of protected landscape designation and also plays a key role in facilitating the economic and social well-being of local and rural communities.

Outcome 12 - Health and Wellbeing: The National Landscape plays a full part in improving the nation's health, benefitting the mental and physical wellbeing of those who experience it.

Outcome 13 - Access and Recreation: The Cotswolds is recognised as a welcoming place, where barriers to access are being removed and everyone feels connected to the landscape.

Outcome 14 - Sustainable Tourism: Businesses and visitors have a shared commitment to contribute to the conservation and enhancement of the natural beauty of the National Landscape.

The policies outline in detail how these outcomes can be achieved and are perhaps the most important – and most utilised part of the plan.

Although the National Landscape Board will play an important role in delivering the vision, outcomes and policies of the Management Plan, their successful delivery is also dependent on all individuals and organisations with an interest in the Cotswolds.

The Management Plan identifies key actions for specific stakeholders. This is a plan for the place not the body. The Management Plan also identifies key indicators for each policy which will be used to gauge progress in its delivery.

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CROSS CUTTING (PURPOSES 1 AND 2) Tackling 21st century issues through progressive partnerships.			PURPOSE 1: TO CONSERVE AND ENHANCE THE NATURAL BEAUTY OF THE COTSWOLDS NATIONAL LANDSCAPE[1] Influencing and delivering for landscape, nature and climate.								PURPOSE 2: TO INCREASE THE UNDERSTANDING AND ENJOYMENT OF THE SPECIAL QUALITIES OF THE COTSWOLDS NATIONAL LANDSCAPE Ensuring access, learning and wellbeing opportunities are for everyone.		
OUTCOME 1: CLIMATE ACTION	**OUTCOME 2: NATURAL & CULTURAL CAPITAL**	**OUTCOME 3: WORKING TOGETHER**	**OUTCOME 4: LANDSCAPE**	**OUTCOME 5: LOCAL DISTINCTIVE-NESS**	**OUTCOME 6: TRANQUILLITY**	**OUTCOME 7: DARK SKIES**	**OUTCOME 8: HISTORIC ENVIRONMENT & CULTURAL HERITAGE**	**OUTCOME 9: BIODIVERSITY AND NATURE RECOVERY**	**OUTCOME 10: RURAL LAND MANAGEMENT**	**OUTCOME 11: DEVELOPMENT & TRANSPORT**	**OUTCOME 12: HEALTH & WELL-BEING**	**OUTCOME 13: ACCESS & RECREATION**	**OUTCOME 14: SUSTAINABLE TOURISM**
POLICY CC1: Climate Change – Mitigation	**POLICY CC3:** Natural & Cultural Capital – Principles	**POLICY CC6**: Developing a consistent, coordinated and landscape -led approach	**POLICY CE1:** Landscape	**POLICY CE3:** Local Distinctiveness	**POLICY CE4:** Tranquillity	**POLICY CE5:** Dark Skies	**POLICY CE6:** Historic Environment and Cultural Heritage	**POLICY CE7:** Biodiversity and Nature Recovery	**POLICY CE8:** Rural Land Management	**POLICY CE10:** Development & Transport - Principles	**POLICY UE1:** Health and Well-being	**POLICY UE2:** Access & Recreation	**POLICY UE3:** Sustainable Tourism
POLICY CC2: Climate Change - Adaptation	**POLICY CC4:** Soils	**POLICY CC7:** Compliance with Section 85 of the Countryside and Rights of Way Act	**POLICY CE2:** Geology						**POLICY CE9:** Problem Species, Pests and Diseases	**POLICY CE11:** Major Development			
	POLICY CC5: Water	**POLICY CC8**: Working together								**POLICY CE12:** Development Priorities & Evidence of Need			
										POLICY CE13: Waste Management and the Circular Economy			

[1] In delivering purposes 1 and 2, the Board has a duty to foster the social and economic wellbeing of people living in the National Landscape. This duty is addressed through relevant policies under the two purposes.

CHAIR'S FOREWORD

The Cotswolds National Landscape has previously produced a Management Plan every five years, with the current plan expiring in 2023. We've made the decision to undertake a limited interim review of this current plan to cover the period 2023-25, so that we can align with the timeline of the government's 25-year Environment Plan and accommodate any changes in policy resulting from the 2019 Landscapes Review.

Our plan continues to address the many issues currently facing the Cotswolds National Landscape. These include helping to mitigate and adapt to climate change, supporting the recovery of wildlife and helping nature to thrive, ensuring everyone has access to the landscape to help improve their health and wellbeing, producing food and other products, and ensuring businesses and livelihoods are maintained. All this, whilst still maintaining the special characteristics and elements of natural beauty which make it a designated Area of Outstanding Natural Beauty.

Many of these demands are increasing but our understanding of their consequences is improving all the time. In our Vision for the Cotswolds, we acknowledge the need to constantly find new win-win solutions that conserve and enhance the landscape and serve the people who live, work, and visit here. Working collaboratively, in partnership with others, will be essential to help identify and implement these solutions. During the two-year span of this interim plan we will further develop the evidence and data, particularly around climate action, so that we can build in meaningful targets towards net zero in our next plan. The new plan will inform how we work in the Cotswolds National Landscape to balance the needs of nature, people, climate – and how we transition into a future that will surely be very different from now.

Brendan McCarthy

Chair, Cotswolds National Landscape Board

February 2023

CHAPTER 1. INTRODUCTION

MANAGEMENT PLAN - CONTEXT

What is the Cotswolds National Landscape?

The Cotswolds National Landscape was designated as an Area of Outstanding Natural Beauty (AONB) in 1966, and extended in area in 1990. Although AONB is still the legal name of the designation it was rebranded as a National Landscape for most purposes in June 2020. At 790 square miles, or 2038 square kilometres, it is the largest AONB – and the third largest protected landscape, including National Parks – in England. The National Landscape stretches from Bath and Wiltshire in the south, through Gloucestershire and Oxfordshire to Warwickshire and Worcestershire in the north. It cuts across 15 local authority areas.

AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them[2]. The statutory purpose of AONB designation is to conserve and enhance their natural beauty[3].

Each AONB has been designated by reason of its 'special qualities'. These include the flora, fauna, historical and cultural associations as well as landscape and scenic views. Information on the 'special qualities' of the Cotswolds National Landscape is provided in Chapter 4.

Further information on National Landscape (AONB) designation is provided in Appendix 1 and information on 'natural beauty' is provided in Appendix 2.

What is the Cotswolds National Landscape Board?

The Cotswolds National Landscape Board ('the Board') was established by Parliament in 2004 as the Cotswolds Conservation Board and has two statutory purposes[4]:

1. To conserve and enhance the natural beauty of the Cotswolds National Landscape.
2. To increase the understanding and enjoyment of the special qualities of the Cotswolds National Landscape.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the National Landscape.

In circumstances where these purposes and duties are irreconcilable, the Board must give priority to conserving and enhancing the natural beauty of the National Landscape[5].

The Board consists of 37 members, of whom 15 are nominated by local authorities, eight by parish councils and 14 are appointed by government. The Board's work programme is delivered by a small

[2] Department for Environment, Food and Rural Affairs (Defra) (2015) *Areas of Outstanding Natural Beauty: Landscape Protection and Enhancement Support Scheme (England) 2015 – 17. Application to European Commission.*

[3] Section 82, Countryside and Rights of Way Act 2000

[4] Section 87, Countryside and Rights of Way Act 2000, as amended by the NERC Act 2006.

[5] This prioritisation of conserving and enhancing is known as the 'Sandford Principle', after Lord Sandford, who chaired the National Parks Policy Review Committee between 1971 and 1974.

team of staff, supported by volunteers including the Cotswold Voluntary Wardens who deliver a programme of practical projects and guided walks across the National Landscape.

Further information about the Board can be found in Appendix 3 and on the Board's website: www.cotswoldsaonb.org.uk

What is the Cotswolds National Landscape Management Plan?

The Cotswolds National Landscape Management Plan ('the Management Plan') is a statutory plan[6], which sets out policies for the management of the National Landscape[7]. The National Landscape Board is the body responsible for preparing and publishing the Management Plan and for reviewing it at intervals of no more than five years. This is the fifth such document prepared by the Board.

Although the Board is the body responsible for preparing and publishing the Management Plan and will play an important role in its delivery, the Board doesn't actually own or directly manage any of the land in the National Landscape or its setting. As such, the policies of the Management Plan are also intended to guide the work of other stakeholders in delivering the Management Plan's vision and outcomes.

Why do we have a Cotswolds National Landscape Management Plan?

The Management Plan is a key mechanism for achieving the purposes of conserving and enhancing the natural beauty of the Cotswolds National Landscape and increasing the understanding and enjoyment of the National Landscape's special qualities. The Management Plan is the only plan to guide the management of the National Landscape as a whole.

Who will deliver the Cotswolds National Landscape Management Plan?

This plan is ultimately about partnership working to make the vision a reality.

The National Landscape Board will play an important role in delivering the vision and outcomes of the Management Plan. However, their successful delivery is also dependent on other stakeholders, including local authorities and other public bodies, land owners and land managers, non-government organisations, developers, businesses and individuals. Many of these stakeholders already make a significant contribution to delivering the vision and outcomes of the Management Plan. This is a plan for the place and all the bodies and individuals engaged in it.

It is a legal requirement for 'relevant authorities', including all public bodies, to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape[8]. This legal requirement is known as the 'duty of regard'. So, for example, local planning authorities shall have regard to this purpose when developing their Local Plans and when making decisions on planning applications.

The duty of regard is intended to ensure that the purpose for which an AONB has been designated (i.e. to conserve and enhance the natural beauty of the AONB) is recognised as an essential consideration in any decisions or activities that impact on the AONB, with the expectation that adverse impacts will be avoided or mitigated where possible[9]

[6] Section 89 (1), Countryside and Rights of Way Act 2000 as amended by the NERC Act 2006.
[7] Section 89, Countryside and Rights of Way Act 2000
[8] Section 85, Countryside and Rights of Way Act 2000.
[9] Natural England (2010) England's statutory designated landscapes: a practical guide to your duty of regard.

More information about the 'duty of regard' is provided in Appendix 4.

How will the Cotswolds National Landscape Management Plan be delivered?

How the Board will contribute to the delivery of the Management Plan itself, as well as encourage and support other stakeholders is set out in a three yearly Business Plan Framework which in turn is delivered through an annual work programme.

Every individual and organisation with an interest in the National Landscape can help make this plan's vision and outcomes a reality by contributing to its delivery. The 'Stakeholder Delivery' table in Appendix 5 provides an indication of the key measures that the Board invites specific stakeholders to undertake in order to help deliver this plan.

How will the delivery of the Cotswolds National Landscape Management Plan be monitored?

The Board will monitor and evaluate its contribution to the delivery of the Management Plan through the quarterly and annual review of its work programme. The 'State of the Cotswolds Report' – together with other local and national monitoring and surveys - will contribute to the provision of evidence, which is a crucial part of managing the National Landscape.

The Board will endeavour to monitor the key actions identified in the 'Stakeholder Delivery' table in Appendix 5. It will also endeavour to monitor compliance with the 'duty of regard' (see Appendix 4).

Appendix 6 shows the key indicators that will be used to monitor the delivery of the Management Plan. The monitoring indicators will demonstrate change over time. There are timed targets within supporting documents such as the Board's key performance indicators and the Cotswolds Nature Recovery Plan. National targets for protected landscapes supported by an outcomes monitoring framework are currently being worked on.

MANAGEMENT PLAN - PROCESS

In order to align with the timing of national and local policy development and guidance this plan is based on an interim review of the 2018 to 2023 plan and will run for two years from 2023 to 2025. A more thorough review will be undertaken to produce a fully revised plan in 2025. Two years is a very short period to achieve the vison and many of the outcomes within this plan so although it runs until 2025 it looks towards the desired state of the Cotswolds in 2030.

Much of the groundwork for the preparation of this plan was undertaken in 2021. A new vision was consulted on and adopted and we held a forward planning day to look at key issues and outcomes.

Throughout 2021 and 2022 research was commissioned taking a closer look at the natural capital and carbon footprint of the National Landscape and a Cotswolds Nature Recovery Plan was developed and published.[10]

A consultation focussing on the wording of policies was undertaken internally and with our local authority partners over the summer of 2022 and a wider fuller consultation was undertaken in the

[10] The Natural Capital Evaluation can be examined via a dashboard on this webpage, where the Cotswolds Nature recovery Plan can also be downloaded: https://www.cotswoldsaonb.org.uk/looking-after/cotswolds-nature-recovery-plan/

Autumn. Throughout both of these consultations 66 responses were received from 44 individuals representing 37 organisations. More individuals contributed as several responses were compiled from across teams.

MANAGEMENT PLAN STRUCTURE AND USE

The core of the plan is made up of four components

- Vision
- Key Issues
- Special qualities
- Outcomes and policies

The vision sets the overall context for the plan and was adopted by the Cotswolds National Landscape Board in June 2021 following consultation with stakeholders. The vison was drawn up in the light of three identified key issues:

- **Key Issue 1, The Climate Emergency**

- **Key Issue 2, Nature's decline and the Ecological Crisis**

- **Key Issue 3, Health and societal changes**

The plan goes on to define the special qualities of the National Landscape. These are the aspects of the area's natural beauty which make the area distinctive and which are considered valuable, especially at a national scale. It is the impact of these key issues amongst others, on the special qualities that has informed the development of the plan's outcomes and polices.

The outcomes and policies are arranged under three over-arching headings which reflect the National Landscape's purpose of designation (to conserve and enhance natural beauty) and the National Landscape Board's additional purpose (to increase understanding and enjoyment). These headings are illustrated further with three broad aims:

1. Cross Cutting Themes
   Tackling 21st century issues through progressive partnerships.

2. Conserving and Enhancing
   Influencing and delivering for landscape, nature and climate.

3. Increasing Understanding and Enjoyment
   Ensuring access, learning and wellbeing opportunities are for everyone.

The outcomes express the desired state of the National Landscape and the policies outline how this can be achieved.

The supporting text for each outcome outlines the underlying issues that the policies are aiming to address. The outcomes have been derived from the vision and were used to establish the policies. They form the link between the long-term vision and immediate action.

The policies are perhaps the most important – and most utilised - part of the Management Plan. They serve five main purposes:

1. They are principles for how the Cotswolds National Landscape should be managed in order to:
    a. conserve and enhance the natural beauty of the National Landscape;
    b. increase the understanding and enjoyment of the National Landscape's special qualities;
    c. foster the social and economic well-being of local communities;
    d. address issues that are having an adverse effect on the National Landscape;
    e. achieve the vision and outcomes of the Management Plan.
2. They provide a framework for action by all stakeholders with a role to play in the management of the National Landscape including the National Landscape Board.
3. They represent the policies of the Board.
4. They are intended to guide, influence and be used by stakeholders in their own plans, policies, proposals, work programmes and decision making.
5. Together with other guidance produced by the Board, they are intended to facilitate a consistent and co-ordinated approach across the whole of the Cotswolds National Landscape[11].

It is important that all of the policies should be considered in their entirety, particularly in relation to development and rural land management. For example, when a development is being proposed in the National Landscape, the developer and the local authority should have regard to all of the policies, not just to Policy CE10 (Development and Transport – Principles).

One of the areas which the Management Plan policies relate to is in the policy-making and decision-taking of local planning authorities (LPAs). For example, it is hoped that LPAs will have regard to the Management Plan policies when reviewing and developing their own policies, including those within their development plans. The Management Plan policies are aspirational and as such, they might go further than current policies in individual development plans. It is intended that these aspirational policies will aid in helping to develop and evidence new local plan policies.

The Management Plan should be a material consideration in planning decisions. However, it is recognised that planning law requires that applications for planning permission be determined in accordance with the LPA's development plan (unless material considerations indicate otherwise).

The policies are consistent in the use of the verbs 'must', 'will' and 'should', as outlined below:

- '**Must**' is used where the relevant stakeholder has a statutory requirement to implement the policy.
- '**Will**' is used where the Board is the stakeholder with primary responsibility for applying and / or delivering the policy.
- '**Should**' is used where a stakeholder other than the Board has primary responsibility for applying and / or delivering the policy (although the Board would still play an active role in many of these).

The plan goes on to consider how it can be delivered and monitored. Further detail and evidence are then provided in appendices.

[11] The Management Plan and guidance documents produced by the Cotswolds National Landscape Board are the only publications that guide the management of the Cotswolds National Landscape as a whole. This is why the Board's guidance documents are specifically mentioned in several policies. The variation in local conditions and the importance of other plans and guidance that relate to specific parts of the National Landscape (i.e. individual local authorities) is also recognised.

CHAPTER 2 - VISION

A COTSWOLDS VISION: A NATIONAL LANDSCAPE FOR EVERYONE

A time of opportunity

The Cotswolds is good for us; we feel better when we are here and engaged with the natural beauty of the landscape around us. In recent years we have been reminded of the intrinsic relationship between ourselves and the natural world – and the condition it is in. We believe the Cotswolds National Landscape offers opportunities for optimism, regeneration, wellbeing, and inclusion.

Challenges lie ahead

We are in the midst of a global climate emergency and an ecological crisis. Our awareness of ongoing social and economic inequalities is heightened. In the Cotswolds, these concerns are as real for us too, and we face significant challenges: climate change; threats to wildlife and habitat; changes to the farming landscape and agriculture; finding ways to deliver opportunities for younger people and provide for an ageing population; and achieving access to, and involvement in, the countryside for everyone – in ways which help benefit the countryside and encourage a diverse range of people to appreciate and care for the Cotswolds.

What can we do, and how should we do it?

To address these issues and begin to make improvements, we need to challenge ourselves. We must avoid complacency, and not adhere doggedly to past beliefs – this will hold us back, and limit how much positive change we can introduce. Instead, we need to embrace new ways of thinking in order to find win-win solutions which both conserve and enhance natural beauty, and serve the people who are here. We will work hard, and in partnership – to find outcomes which offer the most positive benefits and the least negative impact. We will need to demonstrate collaboration and leadership. We will need to be energetic and proactive. We will need to be bold, brave, and confident. Above all, we will need to acknowledge that we can't do it all alone – we want to work with other organisations and individuals to achieve results which benefit all of us, and nature.

The future should be bright

The treasured landscapes which make the Cotswolds nationally and internationally important are diverse in character, as are the people who live, work, and visit here. There is no 'one size fits all' for the future – but we have a greater opportunity than ever before to pull together as communities across the Cotswolds, and to work with each other to harness our dedication and expertise to forge the future of the Cotswolds. This place, the Cotswolds National Landscape, is for everyone, from all walks of life. In sharing it and looking after it, we will continue to create a place that is vibrant, unique, welcoming, and truly special – for people and for nature. We will work towards ensuring that the Cotswolds stays a working landscape, where agriculture thrives and supply chains are secure. Our communities should be connected and diverse, but self-sustaining. Visitors should feel welcome to enjoy being here, confident about access, and motivated to give something back to help look after the landscape. This should be a place where the landscape, nature, and people work in harmony with each other.

The Cotswolds will be a place that will inspire generations of people to look after it – now and in the years ahead.

CHAPTER 3. KEY ISSUES

The Board has identified three key issues that it considers to be having a significant effect on this plan's outcomes and in achieving its two purposes of:

- conserving and enhancing the natural beauty of the Cotswolds National Landscape; and
- increasing the understanding and enjoyment of the special qualities of the National Landscape.

These can be summarised as follows:

- **Key Issue 1, The Climate Emergency**
  Mitigating and adapting to climate change whilst conserving and enhancing the natural beauty of the National Landscape.

  Climate change is happening, and we are already experiencing the dangerous impacts of a rapidly heating climate. Many of the defining characteristics and special qualities of the Cotswolds National Landscape are threatened, however, a window of opportunity remains to prevent its worst impacts, and to help people and wildlife adapt.

  The Cotswolds National Landscape Climate Change Strategy[12] (adopted by the National Landscape board in February 2022) summarises our current understanding of the climate change impacts on the Cotswolds and what stakeholders can do to both adapt to and mitigate these impacts.

  Ambitious climate action is necessary to mitigate climate change and avoid its worst consequences for the Cotswolds, and the Cotswolds National Landscape is not exempt from playing a full part. Farming needs to change to improve soils to continue producing food, reduce soil loss, sequester carbon and help with improving water quality and flood management; tree cover needs to increase to capture carbon and support nature recovery, much more of our energy needs will have to be met through low carbon energy technologies.Buildings need to become energy efficient and infrastructure needs to be more resilient. All this has to be done in ways that conserve and enhance the Cotswolds for future generations.

  The Landscapes Review[13] emphasised the importance of the role National Landscapes should play in mitigating and adapting to climate change:

  "National landscapes should take a leading role in the response to climate change through their Management Plans."

  In November 2021 the National Landscape Board adopted a Climate Change Commitment[14] in which states that:

  "It is our commitment to identify a scenario which allows us to endorse a path to Net Zero emissions (or better) by 2050 (or sooner)."

[12] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2022/03/CNL-Climate-Change-Strategy-Adopted-Feb-2022.pdf
[13] Landscapes Review, Julian Glover, September 2019
[14] https://www.cotswoldsaonb.org.uk/about-us/corporate-documents-reports/

In line with all AONB's commitment in the Colchester Declaration[15], this scenario will include clear, measurable targets to achieve Net Zero. This pathway will be in place in time for inclusion in the 2025 Cotswolds National Landscape Management Plan.

Some climate change mitigation and adaptation measures have the potential to adversely affect the natural beauty of the National Landscape, but with careful design and implementation, many of these measures can not only conserve but also enhance natural beauty. The challenge is to develop a pathway to net zero which also conserves and enhances natural beauty.

- **Key Issue 2, Nature's decline and the Ecological Crisis**
  Enabling wildlife to recover, flourish and adapt to climate change through a robust nature recovery network which additionally provides us with clean air and water and healthy soils.

  The story of our loss of wildlife is well documented and understood. This plan is about how we can turn this around and most importantly turn it around now. Climate change is a well-recognised driver combining with habitat destruction to threaten the loss of our already diminished wildlife at an even greater scale and pace. The need for action is urgent if we are to avoid a mass extinction event. The Landscapes Review[16] found that this urgent need to do more for nature was a dominant theme:

  In our call for evidence, the message was clear: more than any other single thing, people and organisations agreed that our landscapes should do more for nature.

  We know what we have to do to allow our wildlife to flourish and adapt to climate change. We need to create a robust and resilient nature recovery network – a landscape rich in joined up and well managed habitats. Such a nature recovery network is not only good for wildlife, it provides a range of 'ecosystem services' such as clean water or food or a beautiful place to get away from it all and enjoy some peace surrounded by nature. These ecosystem services are critically important to the wellbeing and economy of people living in and around the Cotswolds.

  The Landscapes Review proposed that:

  National Landscapes should form the backbone of Nature Recovery Networks – joining things up within and beyond their boundaries

  AONB's collectively responded to the challenge of the Landscapes Review with the Colchester Declaration[17] which contains commitments to produce nature recovery plans and restore habitats and populations of endangered species.

  The Cotswolds Nature Recovery Plan was adopted as Cotswolds National Landscape guidance in October 2021. It represents a detailed look at the species and habitats of the Cotswolds and what should be done to enable their recovery and adaptation to climate change.

[15] A commitment to tackle the climate emergency and ecological crisis signed by all AONBs at a national conference in Colchester in 2019. https://landscapesforlife.org.uk/projects/Colchester-declaration

[16] Landscapes Review, Julian Glover, September 2019

[17] A commitment to tackle the climate emergency and ecological crisis signed by all AONBs at a national conference in Colchester in 2019. https://landscapesforlife.org.uk/projects/Colchester-declaration

- **Key Issue 3, Health and societal changes**
  Ensuring that livelihoods are maintained and that everyone within and around the National Landscape can realise the health and wellbeing benefits of accessing its natural beauty.

  We face unprecedented environmental challenges in the form of the climate emergency and ecological crisis. We have to respond quickly and vigorously to address them and furthermore we have to do this in a way that supports livelihoods and communities. The solutions have to work in social and economic terms as well as environmental if they are to have a lasting impact.

  The mental and physical health benefits of accessing natural beauty are becoming increasingly understood and appreciated. The Landscapes Review published by Julian Glover in 2019 challenged Protected Landscapes to do more to welcome people and crucially to do a lot more to ensure that people from currently underrepresented groups can enjoy the benefits of accessing them too. A Challenge that the Cotswolds National Landscape Board intends to address, building on current activity and continuing to work with stakeholders, old and new.

The impact of these key issues on the natural beauty of the National Landscape were considered during the development of the vision and the outcomes.

CHAPTER 4. THE SPECIAL QUALITIES OF THE COTSWOLDS NATIONAL LANDSCAPE

The 'special qualities' of a National Landscape are those aspects of the area's natural beauty which make the area distinctive and which are considered valuable, especially at a national scale. They are the key attributes on which the priorities for its conservation, enhancement and management are based. They bring out the essence of the National Landscape as an evocative description of the area rather than as a statistical account.

THE SPECIAL QUALITIES OF THE COTSWOLDS NATIONAL LANDSCAPE – STATEMENT OF SIGNIFICANCE

The Cotswolds is a rich mosaic of historical, social, economic, cultural, geological, geomorphological[18] and ecological features. The special qualities of the Cotswolds National Landscape are:

- the unifying character of the limestone geology – its visible presence in the landscape and use as a building material;
- the Cotswold escarpment, including views from and to the National Landscape;
- the high wolds – a large open, elevated predominately arable landscape with commons, 'big' skies and long-distance views;
- river valleys, the majority forming the headwaters of the Thames, with high-quality water;
- distinctive dry stone walls;
- flower-rich grasslands particularly limestone grasslands;
- ancient broadleaved woodland particularly along the crest of the escarpment.
- variations in the colour of the stone from one part of the National Landscape to another which add a vital element of local distinctiveness;
- the tranquillity of the area, away from major sources of inappropriate noise, development, visual clutter and pollution;
- extensive dark sky areas;
- distinctive settlements, developed in the Cotswold vernacular with high architectural quality and integrity;
- an accessible landscape for quiet recreation for both rural and urban users, with numerous walking and riding routes, including the Cotswold Way National Trail;
- significant archaeological, prehistoric and historic associations dating back 6,000 years, including Neolithic stone monuments, ancient drove roads, Iron Age forts, Roman villas, ridge and furrow fields, medieval wool churches and country estates and parks;
- a vibrant heritage of cultural associations, including the Arts and Crafts movement of the 19th and 20th centuries, famous composers and authors and traditional events such as the Cotswolds Olimpicks, cheese rolling and woolsack races.

[18] Geomorphology is the physical features of an area, strongly influenced by geology.

CHAPTER 5. OUTCOMES AND POLICIES

CROSS CUTTING THEMES

Tackling 21st century issues through progressive partnerships

THE CLIMATE EMERGENCY

OUTCOME 1 - CLIMATE ACTION: The National Landscape is a place that is mitigating and adapting to climate change, and has a clearly defined pathway towards Net Zero emissions**.**

1.1. Our climate is rapidly changing, driven by greenhouse gas emissions from human activities. We are already experiencing the dangerous impacts of a rapidly heating climate and many of the defining characteristics and Special Qualities of the Cotswolds National Landscape are threatened by climate change and potentially our responses to it. Even if we cut emissions to zero tomorrow, further warming is inevitable due to the legacy of greenhouse gases in the atmosphere that will take decades to decline to safe levels. However, a window of opportunity remains for ambitious climate action to prevent its worst impacts, and to help people and wildlife adapt.

1.2. The need for climate action is urgent, but it needs to be well thought out and carefully implemented. The Cotswolds National Landscape is not exempt from playing a full part, but all this can be and should be done in ways that conserve and enhance the Cotswolds for future generations. Improving carbon literacy and understanding of the Cotswold landscape will help ensure the Cotswolds National Landscape remains both beautiful and resilient into the future.

POLICY CC1: CLIMATE CHANGE – MITIGATION

CC1.1. Greenhouse gas emissions should be minimised through a range of measures, including:

- Reducing energy demand in existing and new buildings and infrastructure:
  - Improving energy efficiency, for example, by retrofitting existing buildings. Where traditional buildings including listed buildings are retrofitted, this must be undertaken by historic building specialists and in a manner that is compatible with the purpose of National Landscape (AONB) designation;
  - Reducing embodied carbon through secondary and recycled material use within all construction unless demonstrably unachievable on technical and practical grounds;
  - Utilising passive measures, for example the orientation of buildings and the provision of high levels of insulation;
  - Sustainable construction methods and management plans to reduce and manage construction waste should be implemented;
  - Incentivising voluntary sustainability standards, for example BREEAM, Building with Nature, and One Planet Living principles.
- Reducing energy demand through transport and travel:
  - Reducing car use for example, through increasing green and active travel including public transport and Increasing shared mobility through car sharing schemes;
  - Reducing the need to travel for example by encouraging home working and affordable housing provision close to sources of employment, services and facilities;
  - Improving the sustainability of travel through for example; public transport hub promotion/ integration and information, and prioritising the provision of walking, cycling and public transport use, including adequate cycle parking
  - Providing sufficient infrastructure for the charging of electric vehicles, scooters and bikes;
  - Promoting messages aimed at minimising air travel by Cotswolds residents.
- Generating energy from low carbon sources in a manner consistent with the purpose of National Landscape (AONB) designation;
  - All developments, should have a net zero operational carbon balance and 100% energy provided by low carbon sources. Alternatives to fossil fuel energy sources should be used.
- Purchasing locally produced food products and services and encouraging small-scale vegetable growing in gardens and allotments.

CC1.2. Climate change mitigation including the sequestration of carbon should be a key component of land management practices and Environmental Land Management, and rural development support mechanisms in the National Landscape.

CC1.3. Climate action should be undertaken in a way compatible with the conservation and enhancement of the natural beauty of the Cotswolds National Landscape.

POLICY CC2: CLIMATE CHANGE - ADAPTATION

CC2.1. The risks posed by the consequences of climate change should be reduced through a range of adaptation measures, including those identified in relevant policies of this Management Plan[19].

CC2.2. Climate change adaptation should be a significant driver in all new development, infrastructure and transport provision[20].

CC2.3. Climate change adaptation should be a key component of land management practices and Environmental Land Management and rural development support mechanisms, in the National Landscape.

CC2.4. Further research into the predicted impacts of climate change on the Cotswolds National Landscape should be undertaken. This research should be used to advise and inform sustained behavioural change to adapt to climate change and conserve and enhance the National Landscape and its special qualities.

1.3. Global and UK average temperatures have increased by around 1.2˚C since the 1850 – 1900 period. The UK Met Office's 2021 report[21] states that climate change trends projected for the 21st century show an increased chance of warmer, wetter winters and hotter, drier summers along with an increase in the frequency and intensity of extremes.

1.4. Between 2009-2018, UK winters have been on average 5% wetter than 1981-2010 and 12% wetter than 1961-1990, and that summers in the UK have also been 11% and 13% wetter, respectively" Total rainfall from extremely wet days increased by around 17% in the decade 2008-2017 for the UK as a whole and surface water flooding is projected to increase in frequency and severity in the future. In addition to increasing precipitation volumes, climate change has already made it 12-25% more likely that the UK will again experience a summer as hot as 2018, an extreme that is projected to become 50% more likely with future warming .

1.5. In November 2021 the Cotswolds National Landscape Board adopted a Climate Change Commitment[22] in which states that:

"It is our commitment to identify a scenario which allows us to endorse a path to Net Zero emissions (or better) by 2050 (or sooner)."

1.6. The National Landscape Board first published a 'Climate Change Strategy for the Cotswolds National Landscape' in 2012 and an updated version was adopted in February 2022[23]. Most of the measures proposed in the strategy to mitigate and adapt to the impacts of climate change, and

[19] Relevant policies (with the most relevant shown in **bold**) include: CC6, para 1; **CC4, para 2**; **CC5, para 1**; CE6, para 1; **CE7, para1**; CE8; **CE9, para 3**; CE10, paras 1 & 3; CE11, para 2; and UE3.
[20] Additional measures not explicitly addressed in the Management Plan include protecting transport infrastructure from extreme weather events and ensuring that all new and retrofit development recognises the need to compensate for hotter summers and extreme weather events.
[21] Met Office (2021), UK Climate Projections: Headline Findings, July 2021, version 3 p. 6-7. https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18_headline_findings_v3.pdf
[22] https://www.cotswoldsaonb.org.uk/about-us/corporate-documents-reports/
[23] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2022/03/CNL-Climate-Change-Strategy-Adopted-Feb-2022.pdf

much of the supporting information has been incorporated into the Management Plan to some degree.

1.7. Farming needs to change to improve soils to continue producing food, reduce soil loss, sequester carbon and help with improving water quality and flood management; tree and hedgerow cover needs to increase to capture carbon and support nature recovery. To achieve net zero greenhouse gas emissions, much more of our energy needs will have to be met through low carbon energy technologies, buildings need to become energy efficient and infrastructure needs to be more resilient.

1.8. The percentage of households in the Cotswolds National Landscape having no car is 3%, and many people do not have access to a car during the day. This means they are heavily dependent on the frequency and quality of public and/or community transport to access local services. It also exacerbates issues of rural isolation. The introduction and use of technology to help address transport issues and offer increased alternatives such as car sharing and call-up public transport systems could provide viable options for residents and visitors alike whilst simultaneously helping to mitigate climate change. The provision of affordable housing within the National Landscape would help reduce the climate impact of travel to work journeys for those living and working in the area. Any consideration of the carbon footprint of Cotswold's residents must include the impact of flying which is estimated to be two and a half times higher than the UK average.[24]

1.9. Measuring embodied carbon shows that maintaining, refurbishing and retrofitting traditional buildings can reduce carbon emissions in the built environment by over 60%[25] by 2050 compared to new building. Done correctly this can conserve the buildings as a heritage asset, make them more liveable in a changing climate and help mitigate climate change. Passive energy conservation measures, for example the orientation of buildings and the provision of high levels of insulation.also help to minimise the risk of overheating.

1.10. The National Landscape Board has commissioned a "Carbon Footprint Assessment" which when finalised will help inform the development of a pathway to net zero. A review of the Climate Change Strategy will likely be required during the period of this management plan, following the completion of this assessment in 2023.

NATURAL AND CULTURAL CAPITAL

OUTCOME 2 - NATURAL AND CULTURAL CAPITAL: The natural and cultural capital assets of the National Landscape - and the services which they provide – are better understood, conserved and enhanced.

[24] A Green House Gas Emmissions Assement and Target Recommendations for the Cotswolds National Landscape. 2023

[25] https://historicengland.org.uk/content/heritage-counts/pub/2019/hc2019-re-use-recycle-to-reduce-carbon/#:~:text=THERE'S%20NO%20PLACE%20LIKE%20OLD%20HOMES,-5&text=Heritage%20Counts%20is%20an%20annual,responsibilities%20for%20the%20nation's%20heritage.

POLICY CC3: NATURAL AND CULTURAL CAPITAL - PRINCIPLES

1. The natural and cultural capital of the Cotswolds National Landscape and the services they provide – should continue to be assessed and evaluated.

2. The use of natural and cultural capital accounting should be encouraged in order to fully understand the implications of investment, development and management decisions.

3. The financial and non-financial benefits of natural and cultural capital and the services they provide should be promoted.

4. Proposals affecting the Cotswolds National Landscape should have regard to – and seek to conserve and enhance – the natural and cultural capital of the National Landscape and the services they provide.

5. Natural and cultural capital and services they provide should be key components of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape.

The Cotswolds National Landscape has a wealth of natural and cultural capital (the stock of natural and cultural heritage assets) that provide goods and services, often called ecosystem services, that benefit wider society as a whole.

Natural capital stock includes renewable and non-renewable natural resources e.g. geology, minerals, soils, water, air, plants, animals, habitats and ecosystems. The National Landscape's cultural heritage assets are equally rich, including the cultural-historical landscape, individual heritage assets, historic settlements and vibrant cultural activity.

Ecosystem services include; food and fuel provision, the regulation of climate and purification of water, and well-being benefits to people through recreation and appreciation of nature.

These assets - and the services that they provide - are of local, national and, for some services, international importance. However, they are not fully understood or valued.

The Cotswolds National Landscape Board published a Position Statement on 'Conserving and Celebrating Cultural Capital in the Cotswolds AONB' in 2019[26] and in 2021 the Board published 'A Natural Capital Evaluation of the Cotswolds National Landscape'[27] and a 'Cotswolds Natural Capital Atlas'[28] .

[26] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/04/Conserving-and-Celebrating-Cultural-Capital-in-the-Cotswolds-AONB-Adopted-March-2019.pdf
[27] https://envsys-ltd.maps.arcgis.com/apps/MapSeries/index.html?appid=d434eb386d21442694eaa0186a82bb76
[28] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2022/02/Cotswolds-Natural-Capital-Atlas.pdf

POLICY CC4: SOILS[29]

1. Soil degradation should be halted and reversed by managing soils in a way that: (i) increases organic content, water retention and carbon sequestration; and (ii) minimises erosion, water pollution and compaction.

2. Soil management should remain a key component of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape.

Across the National Landscape there are many different soil types, which are subject to degradation from a variety of factors. Loss of soil organic matter results in soils being more prone to drought and less resilient, and requiring higher levels of input to support yields. This, in turn, leads to compaction of soils and the leaching of nitrate and pesticides to groundwater.

With a predicted 22% decrease in summer rainfall by 2080, the free draining Cotswold soils will become more prone to drought. Extreme weather events and a predicted 22% overall increase in winter rainfall could lead to flooding and poaching of soils[30]. These combined impacts would lead to soil damage, erosion and nutrient loss. Soil management practices will, therefore, become even more important.

POLICY CC5: WATER[31]

1. Water resources should be carefully managed and conserved to: improve water quality; ensure adequate aquifer recharge; ensure adequate river flows; and contribute to natural flood management systems.

2. Development (new and existing sites) should assess and minimise flood risk and implement sustainable drainage schemes, adopt high water efficiency standards in line with RIBA 2030 Climate Challenge targets, and water conservation measures, for example rainwater harvesting and/or water recycling and grey water systems.

3. Sewerage pollution from storm overflows should be minimised and be at least within legal and regulatory requirements.

The Cotswolds is home to a large aquifer which supplies water to homes and businesses both inside and outside the National Landscape. Groundwater sources also need to be carefully managed to ensure the water is safe to use and that abstraction does not impact negatively on river flows.

The rivers in the National Landscape are important for water supply, recreation and biodiversity. They provide a range of habitats which are reliant on particular water flow and levels. However, some stretches of Cotswold's rivers are already prone to low flows, resulting in damage to riverine habitat, concentration of pollutants and less water for abstraction. Over abstraction can have a detrimental impact on these factors. Summers are predicted to become drier, which would exacerbate this problem even further.

[29] Soils are addressed under Natural Capital and Ecosystem Services, rather than meriting their own section, because they are not key features of the special qualities of the National Landscape.
[30] Cotswolds National Landscape Climate Change Strategy. February 2022.
[31] Water is addressed under Natural Capital and Ecosystem Services, rather than meriting its own section, because it is not a key feature of the special qualities of the National Landscape.

Around half of the area's groundwater is classed as being of poor quality, particularly in the north and west, due to pollutant inputs. The main sources of pollution are from wastewater treatment works followed by agricultural runoff. Water discharged from wastewater treatment works contains phosphate, nitrogen and ammonia and at times of peak flow raw sewerage is discharged directly into rivers. Flood management strategies should aim to avoid these occurrences. Agricultural runoff contains phosphates bound to silt and nitrogen.

The water in the National Landscape is mainly fed by flow from deep in the limestone aquifers. The Environment Agency has been establishing projects within the National Landscape to improve the ecological condition of the rivers. Catchment Management Plans (CMP) provide the actions needed to achieve good ecological condition. Water Framework Directive data for 2016 indicates that 35% of the monitored river lengths in the National Landscape are in good ecological condition. Since 2013 there has been a decrease in the length of river in poor ecological condition.[32] There are concerns with phosphate and sediment levels in some watercourses and groundwater supplies.

The Cotswolds National Landscape is not, at present, an area widely prone to flooding. However, in extreme rainfall events, such as that of July 2007, some towns and villages have been affected by flooding from rivers or as a result of limited drainage. Climate change is likely to increase the risk of flooding and the frequency of such extreme rainfall events.

The rivers that originate in the National Landscape flow downstream through larger towns and villages outside of the National Landscape which are more prone to flooding. As such, land management in the rivers valleys of the National Landscape can play a key role in helping to reduce flood risk downstream. Natural flood management works with natural processes to 'slow the flow' of flood waters. This helps to reduce the maximum water height of a flood (the 'flood peak') and / or delay the arrival of the flood peak downstream, increasing the time available to prepare for floods. Sustainable drainage systems, and ecological river restoration projects are important components of natural flood management.

With the anticipated drier summers and wetter winters, there is likely to be an increased demand for rainwater harvesting and storage.

WORKING TOGETHER

OUTCOME 3 - WORKING TOGETHER: Through collaborative partnerships and a shared understanding, the purposes of the National Landscape and its Board are applied consistently across the whole area.

This Management Plan is a place-based plan for the Cotswolds National Landscape, not just the National Landscape Board - the Board is unable to deliver the plan by itself. The Plan helps inform the activity of a multitude of partners, stakeholders, landowners, communities and visitors in order to contribute to the purposes of the protected landscape designation.

[32] State of the Cotswolds 2017.

POLICY CC6: DEVELOPING A CONSISTENT, COORDINATED AND LANDSCAPE-LED APPROACH

1. Stakeholders across the Cotswolds National Landscape should take a consistent and co-ordinated approach to conserving and enhancing the natural beauty of the National Landscape, including its special qualities and increasing the understanding and enjoyment of its special qualities.

The Cotswolds National Landscape is an administratively complex area, extending across 15 local authorities and three geographical regions. This makes it very challenging to develop and deliver a consistant approach to conserving and enhancing the natural beauty of the National Landscape including its special qualities and increasing the understanding and enjoyments of its special qualities. However, the potential benefits are huge, including better coordination of planning, development, Environmental Land Management schemes, nature recovery planning, tourism and recreation.

Taking a consistent approach, in this context, means being consistent in having regard to (and, ideally, being compatible with): the statutory purpose of conserving and enhancing the natural beauty of the National Landscape; national policy relating to AONBs; the policies of the Management Plan; and the guidance and position statements published by the Board. However, this does not necessarily mean that decisions made or actions taken will always be the same across the whole of the National Landscape, as these will vary depending on local social, economic and environmental circumstances.

Guidance on what is meant by 'landscape-led' is provided in the Board's Landscape-led Development Position Statement.

POLICY CC7: COMPLIANCE WITH SECTION 85 OF THE COUNTRYSIDE AND RIGHTS OF WAY ACT

1. Relevant authorities, including public bodies, must comply with Section 85 of the Countryside and Rights of Way Act (the 'duty of regard') and should have regard to the supporting guidance published by Defra and Natural England.

The legal requirement for public bodies to have regard to the purpose of National Landscape (AONB) designation ('the duty of regard') provides an important mechanism for conserving and enhancing the natural beauty of the National Landscape. Further information on the 'duty of regard' is provided in Appendix 4.

POLICY CC8: WORKING IN PARTNERSHIP

1. Stakeholders should work in partnership to support the purposes of conserving and enhancing the natural beauty of the Cotswolds National Landscape and increasing the understanding and enjoyment of its special qualities. Stakeholders should also cooperate in fostering the economic and social well-being of communities in and around the National Landscape.

2. Communities and businesses within and around the Cotswolds National Landscape should be encouraged to value and celebrate being part of a nationally recognised landscape and to contribute to the purpose of National Landscape (AONB) designation.

3. All relevant stakeholders should work together to ensure the successful implementation of the Landscapes Review proposals that Government identified as priority in its response to the review[33].

The Landscapes Review[34] challenges Protected Landscapes to do a great deal more for both people and nature. It also recognises that this will require more resources and new ways of working. A proactive, multi-partnership approach is needed to enable the National Landscape to realise additional benefits through, for example, funding sources and increased participation across the National Landscape. This approach is also needed to help local communities and businesses recognise and celebrate the benefits of being part of a designated landscape.

Though there is generally a significant level of appreciation for the Cotswolds landscape amongst communities and businesses in and around the National Landscape, awareness and understanding of its status as a protected landscape and the implications of this are lacking. This reduces awareness of the need for protection and enhancement of the sense of place, its distinctive features and special qualities.

CONSERVING AND ENHANCING

Influencing and delivering for landscape, nature and climate.

LANDSCAPE

OUTCOME 4 - LANDSCAPE: The evolving landscape and much-loved character of the Cotswolds is better understood and at the heart of all we do and the decisions we make.

[33] Government Response to the Landscapes Review. Department for Environment Food and Rural Affairs. January 2022.
[34] Julian Glover September 2019

POLICY CE1: LANDSCAPE

1. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds National Landscape, should have regard to, be compatible with and reinforce the landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Character Assessment and Landscape Strategy and Guidelines. There should be a presumption against the loss of key characteristics identified in the landscape character assessment.

2. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds National Landscape, should have regard to the scenic quality of the location and its setting and ensure that views - including those into and out of the National landscape – and visual amenity are conserved and enhanced.

3. Conserving and enhancing landscape character should be a key objective of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape.

4. Rural skills training and the utilisation of those skills – such as dry stone walling, stone-masonry, traditional woodland management and hedgelaying – will be supported to ensure the long-term retention, creation and management of the key features of the Cotswolds National Landscape.

Landscape changes over time. Such change is often perceived as slow or non-existent, but when a view or place is compared to its earlier self, even over a comparatively short time span, the change can be dramatic. Since National Landscape (AONB) designation in 1966 much has changed in the Cotswolds, driven to a large extent by technological advances in agriculture, Environmental Land Management schemes and woodland grants, changes in the shooting and equestrian sectors, tree diseases, fluctuations in commodity prices, population growth and migration and changes in employment and communications, all of which can be influenced by Government policy and financial support. Continued change is inevitable and will have an impact on the landscape and the appearance of the Cotswolds in the future. Addressing the climate emergency, nature's decline and the ecological crisis will cause more change. This change needs to be managed and guided to ensure the Cotswolds retains its landscape character and special qualities.

It is important to consider the cumulative impact of changes on landscape character. This applies to both incremental building development and land use change particularly equestrian development and horticultural production under polytunnels.

The surroundings and setting of the National Landscape are important to its landscape and scenic beauty. For example, the impact of development and land management outside the National Landscape on views from - and to - the National Landscape is an important consideration, as is the retention of key views.

New support mechanisms for farming, forestry and other land management sectors could impact the conservation and enhancement of the landscape and special qualities of the National Landscape. It could also lead to legislative changes in environmental protection and management impacting on the conservation and enhancement of the National Landscape and its special qualities.

The loss of traditional skills is a significant issue for the future management of the landscape and the special qualities of the National Landscape.

In 2021 the National Landscape Board published a position statement on Landscape Led Development[35] supported by appendices.[36]

POLICY CE2: GEOLOGY

1. Proposals that are likely to impact on the geological features of the Cotswolds National Landscape should have regard to these features and seek to conserve and enhance them.

2. The geological features of the Cotswolds National Landscape should be conserved and enhanced through effective management.

3. Opportunities should be sought to promote awareness and understanding of the geological features of the Cotswolds National Landscape.

4. Exploration and research into the geology of the Cotswolds National Landscape should be continued in order to improve understanding of the landscape, and of the geological resource and its importance to inform the conservation and management of geological and geomorphological sites.

The Cotswolds National Landscape is significant for its geology and geomorphology with some features unique to the area. The geology influences the landscape, soils and biodiversity and has played a significant role in the National Landscape's industry and heritage. Survey work has also identified the Cotswolds as significant for tufa streams and springs. It is vital that this geological resource is protected, conserved, enhanced, promoted and better understood.

LOCAL DISTINCTIVENESS

OUTCOME 5 - LOCAL DISTINCTIVENESS: In a world of constant and rapid change, the local distinctiveness of the National Landscape is valued, conserved and enhanced.

[35] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2021/04/Landscape-Led-Development-Position-Statement-FINAL-April-2021.pdf
[36] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2021/04/Landscape-Led-Development-Position-Statement-FINAL-April-2021-Appendices.pdf

POLICY CE3: LOCAL DISTINCTIVENESS

1. Proposals that are likely to impact on the local distinctiveness of the Cotswolds National Landscape should have regard to, be compatible with and reinforce this local distinctiveness. This should include:

    - being compatible with the Cotswolds Conservation Board's Landscape Character Assessment, Landscape Strategy and Guidelines and Local Distinctiveness and Landscape Change;

    - being designed and, where relevant, landscaped to respect local settlement patterns, building styles, scale and materials and in accordance with design guidance prepared by local planning authorities;

    - using an appropriate colour of limestone to reflect local distinctiveness.

2. Innovative designs, compatible with the conservation of natural beauty – which are informed by local distinctiveness, character and scale – should be welcomed.

3. The development of design guidance – which is supported by a robust evidence base and which reflects relevant guidance published by the Cotswolds National Landscape Board – will be encouraged.

4. Provision should be made for the quarrying of limestone, at an appropriate scale, in order to provide building materials that help maintain and enhance the local distinctiveness of the National Landscape. Any production of aggregate and agricultural lime should be secondary and necessary for local and necessary operational purposes. Any such mineral sites should be required to demonstrate that they do not have any significant adverse effects on the natural beauty of the National Landscape including its special qualities or the integrity of existing wildlife sites.

As outlined in Chapters 2 and 3, one of the special qualities of the Cotswolds National Landscape is the unifying character of the limestone geology – its visible presence in the landscape and its use as a building material. Development pressures could potentially erode this local distinctiveness, for example, through the use of inappropriate building materials and inappropriate design. The publication and promotion of design guidance that reflects local distinctiveness is an essential tool for addressing this issue. It will also be important to maintain an adequate supply of locally sourced, appropriately coloured limestone.

Local distinctiveness includes natural elements including but not limited to: woodlands, grasslands, species, the shape and scale of fields, and the character of field boundaries such as hedges and walls. These elements should guide the design of new green and blue infrastructure.

TRANQUILLITY

OUTCOME 6 - TRANQUILLITY: Noise pollution and visual disturbance are minimised to maintain tranquillity across the National Landscape.

POLICY CE4: TRANQUILLITY

1. Proposals that are likely to impact on the tranquillity of the Cotswolds National Landscape should have regard to this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise pollution and other aural and visual disturbance.

2. Measures should be taken to remove and where removal is not possible minimise existing sources of noise pollution and other aural and visual disturbance in order to enhance the tranquillity of the Cotswolds National Landscape.

3. Proposals that are likely to impact on the tranquillity of the CNL should have regard to – and be compatible with – the National Landscapes Board's Tranquillity Position Statement. [37]

Research undertaken by CPRE has identified a growing loss of tranquil areas in England, down from 75% of England in the 1960s to around 50% in 2007[38]. Although the Cotswolds National Landscape has a relatively high level of tranquillity, the National Landscape is being increasingly affected by unwanted, man-made noise and by activity arising from developments. For example, the increasing demand for air transport is leading to expansion of controlled air space over the National Landscape. Additionally, the use of drones, both commercially and privately, is likely to increase, further reducing levels of tranquillity.

Tranquillity relates to issues of visual impact and light pollution as well as noise and other disturbance. However, given that Policy CE1 addresses visual impacts and Policy CE5 addresses light pollution, Policy CE4 has an emphasis on noise. This incorporates issues such as significant increases in traffic in the towns, villages and smaller settlements of the National Landscape, including increased traffic arising from developments outside of the National Landscape.

The National Landscape Board published a position statement on tranquillity in 2019.

It is important to note that this policy is not intended to prevent the noise arising from normal working countryside operations such as operating power tools or farm machinery or non-mechanised quiet recreation.

[37] Cotswolds National Landscape Board (2019) Tranquillity Position Staement (link).
[38] CPRE (2007) Developing an Intrusion Map of England (link).

DARK SKIES

OUTCOME 7 - DARK SKIES: Fewer areas of the National Landscape are affected by light pollution.

POLICY CE5: DARK SKIES

1. Proposals that are likely to impact on the dark skies of the Cotswolds National Landscape should have regard to these dark skies, by seeking to avoid and where avoiding is not possible, minimise light pollution.

2. Proposals that are likely to impact on the dark skies of the CNL should have regard to recognised standards and guidance, in particular, that published by the Institution of Lighting Professionals and the Commission for Dark Skies.

3. Measures should be taken to increase the area of dark skies in the Cotswolds National Landscape by removing and where removal is not possible minimisinge existing sources of light pollution.

4. Consideration will be given to seeking a formal dark sky designation for those parts of the Cotswolds National Landscape that are least affected by light pollution.

'Light pollution' of the night sky is an intrusion into the countryside at night, which can have harmful effects on the health of people and wildlife. Although the Cotswolds National Landscape has relatively dark skies at night, compared to other parts of England (being ranked 13th in terms of the darkest skies in England), light pollution from the surrounding urban areas and the market towns does adversely affect the darks skies of the National Landscape in those locations. With ever-increasing levels of new housing in the National Landscape, light pollution is likely to get worse unless action is taken to address this issue.

The National Landscape Board adopted and published a Cotswolds Dark Skies & Artificial Light Position Statement [39] in 2019. It is supported by two appendices:

Appendix A Cotswolds night lights map[40]
Appendix B1 Institution of Lighting Professionals Guidance Notes For the reduction of Obtrusive Light[41]
Appendix B2 Commission for Dark Skies Good Lighting Guide[42]

[39] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Cotswolds-Dark-Skies-Artificial-Light-Position-Statement.pdf
[40] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Dark-Skies-Artificial-Light-Appendix-A-Night-lights.pdf
[41] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Dark-Skies-Artificial-Light-Appendix-B-ILP-Guidance-Notes-For-the-reduction-of-Obtrusive-Light.pdf
[42] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Dark-Skies-Artificial-Light-Appendix-B-CfDS-Good-Lighting-Guide.pdf

HISTORIC ENVIRONMENT AND CULTURAL HERITAGE

OUTCOME 8 - HISTORIC ENVIRONMENT AND CULTURAL HERITAGE: The historic environment and cultural heritage of the National Landscape is better understood, conserved and enhanced.

POLICY CE6: HISTORIC ENVIRONMENT AND CULTURAL HERITAGE

1. Proposals that are likely to impact on the historic environment and cultural heritage of the Cotswolds National Landscape should have regard to heritage assets and their setting, and seek opportunities to conserve and enhance them. This should include respecting the historical elements of landscape character including features such as; buildings, sites, layout and context, including the relationship between the existing feature or settlement and the landscape.

2. Heritage and Cultural Heritage Impact Assessments should be used when considering any change to a heritage asset and to influence decisions regarding the management of the historic environment and cultural heritage assets.

3. The historic environment and cultural heritage of the Cotswolds National Landscape, both designated and non-designated[43], should be conserved and enhanced through effective management.

4. Designated historic environment sites, such as scheduled monuments and listed buildings, and non-designated heritage assets of equivalent significance, should be protected, in line with national policy and guidance.

5. Historic environment and cultural heritage should be a key component of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape.

6. Opportunities should be sought to promote the awareness, understanding and use of Historic Environment Records, Conservation Area Appraisals, Historic Landscape Characterisation and Heritage Strategies and Action Plans. These should be used to influence decisions regarding the management of the National Landscape's historic environment and cultural heritage.

7. The cultural heritage of the Cotswolds should be better understood and celebrated in arts, cultural, and social activities across the National Landscape.

Our historic environment and cultural heritage is the result of a complex history of interaction between people and the natural environment. The historic landscape and natural environment form the foundations of our regional identity and local distinctiveness, contributing to the character and natural beauty of the area.'

Cultural heritage in the Cotswolds runs deeper than associations made with established examples such as the Arts and Crafts Movement or the music of Vaughan Williams. It is more than how the landscape inspires people. It is intrinsically linked to our understanding of the landscape, the changing seasons, farming, and the natural world. Cultural heritage includes oral history, folklore,

[43] 'Non-designated' covers the full spectrum of undesignated assets related to the historic environment, for example, ranging from archaeological sites to sites associated with the Arts and Crafts movement of the late 19th and early 20th centuries.

superstition, tradition and ritual. Without understanding and celebrating this rich cultural heritage, there is a risk it will be lost, and with it will go a key part of the local identity.

The historic environment is irreplaceable and is continuing to decline and be lost due to development, changes in land management and a lack of understanding and management particularly with regard to the wider historic landscape and the less visible and non-designated sites which have little or no protection. The historic environment also includes historic and cultural features of the wider landscape including but not limited to: field (enclosure) patterns and road and path networks.

If historic buildings go out of use, they become at high risk of dereliction and potentially full loss. It is important to keep historic buildings in use, or adapt them appropriately for re-use wherever possible to prolong their lives and character.

Not all heritage assets have currently been identified and it is likely that heritage assets of equal significance to designated sites such as listed buildings or scheduled monuments may survive within the Cotswolds.

The need to understand and promote the connectivity of historic sites and their settings as part of the wider landscape character is vital in order to effectively conserve and manage the historic environment and Historic Landscape Character[44]. Historic Environment Records (HER) of non-designated assets of local significance and Historic Landscape Characterisation (HLC), produced by local authorities need to be better promoted and used by all stakeholders. Historic Landscape Characterisation (HLC) is a method of identification and interpretation of the varying historic character within an area that looks beyond individual heritage assets as it brings together understanding of the whole landscape and townscape into repeating HLC Types. It can be used to help secure good quality, well designed and sustainable places

Land management, farming practices, wildlife conservation and public access all impact upon the historic environment. Current agri-environment/ELM (Environmental Land Management) schemes have contributed to the management and conservation of historic features such as archaeological remains, registered Historic Parks and Gardens, barns, dew ponds and walls in the wider landscape. It is essential that new support mechanisms will play a significant role in encouraging investment in the National Landscape which conserves and manages the historic environment.

New developments, by virtue of their scale and design, surrounding the historic cores of settlements can cause separation of historic cores from the wider landscape and have a detrimental effect on their distinctive character. The conversion or extension of historic buildings and farmsteads, the introduction of domestic clutter, lighting and landscaping resulting from development can harm the historic character of buildings and their setting, and their relationship to the wider landscape.

Climate change is likely to increase the extremes of wetting and drying, leading to accelerated decay of stonework and an increased risk of subsidence. Increased flooding and erosion may cause damage to buildings and to archaeological sites. Policy CE6 should help to reduce the potential impacts of climate change on the historic environment. Additional measures relating to climate change are provided in Policies CC1 and CC2.

[44] More information on Historic Landscape Characterisation at https://historicengland.org.uk/research/methods/characterisation-2/

BIODIVERSITY AND NATURE RECOVERY

OUTCOME 9 - BIODIVERSITY AND NATURE RECOVERY: There is concerted unified action for a widespread recovery of nature - conserving, restoring and enhancing a connected mosaic of distinctly Cotswolds habitats and species.

POLICY CE7: BIODIVERSITY AND NATURE RECOVERY

1. Biodiversity (including the abundance of wildlife) in the Cotswolds National Landscape should be conserved and enhanced by establishing a coherent and resilient nature recovery network across the Cotswolds National Landscape and in its setting. This should be achieved in accordance with the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan[45] and focus on the priority species and habitats listed in Appendix 7.

2. Policy and strategic documents that are likely to impact on the biodiversity of the National Landscape should have regard to the Cotswolds Nature Recovery Plan. This would include, but is not limited to, the following:
    i. Local Plans.
    ii. Neighbourhood Development Plans.
    iii. Green Infrastructure Strategies.
    iv. Tree and Woodland Strategies.
    v. Ecological Emergency and Climate Change Strategies.
    vi. Local Nature Recovery Strategies.

3. Proposals that are likely to impact on the biodiversity of the National Landscape should have regard to – and be consistent with – the Cotswolds Nature Recovery Plan. This would include, but is not limited to, the following delivery mechanisms:
    i. Environmental Land Management and other grant schemes and rural development support mechanisms;
    ii. Biodiversity Net Gain;
    iii. Payment for Ecosystem Services including but not limited to carbon sequestration and storage, flood management, water supply and water quality improvements.

4. A mitigation hierarchy should be applied to development proposals whereby adverse impacts on biodiversity are: (i) avoided; (ii) mitigated; and (iii) compensated for. Development proposals should provide a net-gain in biodiversity of at least 20% particularly with regard to the species and habitats listed in Appendix 7.

5. Damage or loss of irreplaceable habitat should be avoided. Irreplaceable habitat includes but is not limited to:
    I. Ancient and veteran trees
    II. Ancient woodland (continually wooded since 1600);
    III. Ancient unimproved grassland (surviving since 1945);
    IV. Ancient hedgerows (present since before the Enclosure Acts, passed mainly between 1720 and 1840)

6. Measures to conserve and restore biodiversity including the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan should be delivered in a way that is compatible with conserving and enhancing the natural beauty of the Cotswolds National Landscape.

The story of our loss of wildlife is well documented and understood. This plan is about how we can turn this around and most importantly turn it around now. Climate change is a well-recognised driver combining with habitat destruction to threaten the loss of our already diminished wildlife at

[45] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2022/02/Cotswolds-Nature-Recovery-Plan-Full-Version-1.pdf

an even greater scale and pace. The need for action is urgent if we are to avoid a mass extinction event.

We know what we have to do to allow our wildlife to flourish and adapt to climate change. We need to create a robust and resilient nature recovery network – a landscape rich in joined up and well managed habitats. The Cotswolds Nature Recovery Plan[46] was adopted as Cotswolds National Landscape guidance in October 2021. It represents a detailed look at the species and habitats of the Cotswolds and what should be done to enable their recovery and adaptation to climate change.

The current extent of wildlife rich habitats within the Cotswolds is 48,000 Ha which is 23% of the area of the National Landscape. The extent of these habitats needed to form a robust nature recovery network that will enable wildlife to flourish and adapt to climate change is 82,000 Ha, 40% of the area. The rationale for these figures is outlined in the Cotswolds Nature Recovery Plan and summarised in Appendix 8.

In the wider countryside agri-environmental programmes are the most important single mechanism for developing a nature recovery network and Environmental Land Management Schemes will play a critically important role. It is essential that they include the measures recommended in the Cotswolds Nature Recovery Plan.

Additional funding mechanisms are starting to play an increasingly significant role in supporting the recovery of nature particularly Biodiversity Net Gain as mitigation from development and Payments for Ecosystem Services. Water and carbon collection and storage are becoming increasingly valued as ecosystem services and their importance will continue to grow.

Although the national statutory requirement for net gain in biodiversity arising from development proposals will be 10%, this plan states that it should be 20% within the Cotswolds National Landscape. The justification for this enhanced net gain in biodiversity is outlined in appendix 8. This justification includes:

- The Landscapes Review stating that National Landscapes should form the backbone of Nature Recovery Networks
- The Governments response to the Landscapes Review:
    - Linking improvements to the way these areas are protected and managed for nature recovery to the commitment to protect 30% of UK land for nature by 2030.
    - Stating that they; “will put our protected landscapes at the heart of delivering our nature recovery”.

The inclusion of species within the biodiversity net gain policy is aspirational and would take place outside of the formal development plan related biodiversity net gain process.

This priority habitats and species list in Appendix 7 is adapted from Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, which lists the habitats and species that are of principal importance for the conservation of biodiversity in England. The habitats and species in appendix 7 are considered to be: (i) characteristic of the Cotswolds; and / or (ii) those for which the Cotswolds National Landscape is considered to a stronghold. There are other priority habitats and species within the National Landscape, which merit an appropriate level of protection, but which do not meet the two criteria outlined above. Habitats and species not on the NERC Act list but which have been identified, by the National Landscape Board and relevant stakeholders, as priorities for the Cotswolds National Landscape are also included.

[46] Adopted by the National landscape Board in October 2021. https://www.cotswoldsaonb.org.uk/looking-after/cotswolds-nature-recovery-plan/

The Cotswolds Nature Recovery Plan defines ancient and veteran trees (based on a list of characteristics), ancient woodland (continually wooded since 1600) and ancient grasslands ("unimproved" and predating modern agricultural practices) as irreplaceable habitat. A wildflower grassland present in 1945 at the end of the Second World War is likely to be ancient. This should be taken into account when considering proposals that are likely to impact on them.

Ancient hedgerows (present since before the Enclosure Acts, passed mainly between 1720 and 1840) are included as irreplacable habitat and this should be taken into account when considering proposals that are likely to impact on them because:

- Hedgerows are a priority habitat.
- Hedgerows are a key characteristic / feature of many of the landscape character types within the National Landscapes's Landscape Character Assessment.
- Ancient hedgerows are an important component of the historic environment and the cultural heritage of the area.

Although Policy CE7 focusses on the National Landscape and its setting, consideration will also need to be given to ecological networks in the wider environment, for example, river corridor ecological networks where the rivers start in the National Landscape but extend well beyond its boundaries.

One of the ways wildlife adapts to climate change is to move northwards to a new 'climate space'. This means that we need to think about the Cotswold's future wildlife in addition to that currently present, particularly that currently found to the south of the Cotswolds. Big Chalk is a partnership programme aiming to improve ecological connectivity across and between the calcareous landscapes of southern England from the south coast to the midlands.

RURAL LAND MANAGEMENT

OUTCOME 10 - RURAL LAND MANAGEMENT: Land management conserves and enhances the natural beauty of the National Landscape whilst balancing the competing pressures of recovering nature, tackling climate change, food production, supporting livelihoods and public access.

POLICY CE8: RURAL LAND MANAGEMENT

1. Rural land management in the Cotswolds National Landscape and in the setting of the National Landscape should have regard to – and help deliver – the purposes of conserving and enhancing the natural beauty of the National Landscape including its special qualities. It should also help increase the understanding and enjoyment of the National Landscape's special qualities.

2. Rural land management in the Cotswolds National Landscape and in the setting of the National Landscape should have regard to – and, ideally, help to deliver – the Cotswolds National Landscape Management Plan. It should also be compatible with guidance produced by the Cotswolds Conservation Board, including the:
    i. Cotswolds National Landscape - Landscape Strategy and Guidelines;
    ii. Cotswolds National Landscape – Landscape Character Assessment;
    iii. Cotswolds National Landscape Local Distinctiveness and Landscape Change;
    iv. Cotswolds National Landscape Board Position Statements.
    v. Cotswolds Nature Recovery Plan.
    vi. Cotswolds National Landscape Climate Change Strategy

3. Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape should be designed specifically for the National Landscape. These mechanisms should:
    i. address paragraphs 1 and 2, above;
    ii. be managed locally to ensure effective local delivery;
    iii. deliver public goods and services.

The two main aspects of rural land management are farming and woodland management.

The Cotswolds National Landscape is a farmed landscape and its landscape largely a product of farming. 87% of land in the CNL is agricultural land, 49% of which is arable and 43% grassland[47]. Farming is worth around £800 million annually to the National Landscapes economy and in turn provides the landscape which supports the Cotswolds tourism industry annually worth around £1 billion.

Farming has an essential role to play in nature recovery as many of the distinctive Cotswold habitats are a result of farming activity and farming operations such as grazing are necessary to manage and restore them.

Sustainable and regenerative farming practices have an important role to play in delivering multiple environmental objectives whilst simultaneously producing food.

Changes in farming practices, linked to changes in farming policy and the economy of particular crops and livestock, can potentially lead to changes in the landscape of the Cotswolds National Landscape and affect its natural beauty and special qualities, including farmland biodiversity. Changing farming economics, demographics, practices and rural business diversification result in the decline of small mixed farming units and create clusters of land uses which have a detrimental impact upon the landscape such as horse paddocks and 'gentrification'.

[47] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/11/farming-forestry-and-the-equine-sector-in-the-cotswolds-aonb-november-2015.pdf

Bringing woodlands back into management is a priority. Lack of management is due to many factors, but especially due to the loss of appropriate markets for woodland products. Woodland planting should consider its impacts on the landscape setting and, in particular, its effects on the open views that people enjoy from viewpoints, roads and Public Rights of Way. Right Tree, Right Place, Right Reason principles should be applied when planting trees. For example, the planting of 'privacy belts' around property is having a detrimental impact on landscape character and views, particularly from roads. Often inappropriate, fast-growing species are selected and strategies to encourage more appropriate species should be found. In some instances, tree planting that is implemented to mitigate the visual impact of new development can also adversely affect landscape character. Issues relating to landscape character are addressed under Policy CE1 (Landscape). Also, the creation of new woodland should occur where it best meets the objectives of the Nature Recovery Network and it should be appropriately managed. Opportunities for natural regeneration should be looked for in concert with opportunities for planting to assist this process.

Farming, woodland management and other rural land management practices that make a positive contribution to conserving and enhancing the natural beauty of the National Landscape have been largely reliant on payments from agri-environment schemes. It is critical that Environmental Land Management Schemes maintain and build on what has been achieved to date. In addition, payments for carbon sequestration, nature recovery and ecosystem services are areas that will grow.

Climate change is likely to result in an increase in crop and grass yields, but with a greater variability in quantity and quality, including crop failure. New management methods and new varieties are likely to be adopted in response to warmer, drier conditions. The area of energy crops and novel crops is likely to increase. The overall area of grassland is not expected to change significantly, but management may become more extensive. With regards to forestry, increased timber and biomass production can be expected, but with a reduction in quality. Some species, such as oak, are expected to fare better than others such as beech. Land management practices, together with Environmental Land Management and rural development support mechanisms, will need to encompass and deliver climate change mitigation and adaptation measures appropriate to the National Landscape. Relevant measures to mitigate and adapt to the impacts of climate change, in relation to rural land management, are outlined elsewhere in this Management Plan, notably in policies CC1 and CC2.

POLICY CE9: PROBLEM SPECIES[48], PESTS AND DISEASES

1. The population of grey squirrel and deer in the Cotswolds National Landscape should continue to be controlled and managed. This should be undertaken and coordinated at a landscape scale.

2. National guidance - and guidance produced by the Board - on Ash Dieback should be followed to ensure any measures implemented will conserve and enhance the qualities of the landscape.

3. National and local guidance - including guidance from Government Agencies and the Non Native Species Secretariat - on invasive non-native species, pests and diseases should be followed and appropriate biosecurity measures promoted.

[48] These species are not addressed in the Biodiversity section as they are not species that we are that we are aiming to conserve and enhance (see Annex 8).

Increasing deer and grey squirrel populations and lack of co-ordinated management is having an adverse impact on the landscape of the Cotswolds National Landscape and on the quality of woodland, woodland biodiversity and timber. There is a need for more deer management groups.

There is an increasing prevalence of tree pests and diseases resulting from climate change, increased global trade, travel and the importation of diseased material. In particular, Ash Dieback will have an increasing impact on woodland and trees in the landscape during the life of the Management Plan.

There are a number of invasive non-native species present in the National Landscape that are having a harmful impact, particularly on biodiversity. These include Himalayan Balsam and New Zealand Pygmy Weed in rivers and ponds, and Holm oak and Cotoneaster on species rich grassland. Driven by climate change and globalisation, there is an increasing risk of further plant and animal pests and disease becoming established in the National Landscape and having a harmful impact on landscape, biodiversity and the economy.

DEVELOPMENT AND TRANSPORT

OUTCOME 11 - DEVELOPMENT AND TRANSPORT : Development and transport schemes positively contribute to the purposes of protected landscape designation and also plays a key role in facilitating the economic and social well-being of local and rural communities.

POLICY CE10. DEVELOPMENT AND TRANSPORT - PRINCIPLES

1. Development and transport proposals in the CNL and it setting should have regard to – and help to deliver - the purpose of conserving and enhancing the natural beauty of the CNL. In doing so, they should have regard to – and be compatable with the Cotswolds National Landscape Management Plan and guidance produced by the Cotswolds National landscape Board, including the:

   (i) Cotswolds National Landscape - Landscape Strategy and Guidelines;
   (ii) Cotswolds National Landscape - Landscape Character Assessment;
   (iii) Cotswolds Nature Recovery Plan:
   (iv) Cotswolds National landscape Local Distinctiveness and Landscape Change;
   (v) Cotswolds National Landscape Board's Position Statements.

2. Development and transport proposals in the CNL should, have regard to – and help deliver – the purpose of increasing the understanding and enjoyment of the CNL's special qualities. They should also contribute to the economic and social well-being of CNL communities, in a way that is compatible with conserving and enhancing the natural beauty of the CNL.

3. Development and transport proposals in the Cotswolds National Landscape and its setting should comply with relevant national planning policy and guidance, particularly with regards to those paragraphs of the National Planning Policy Framework (NPPF) that explicitly relate to AONBs.

4. The purposes of conserving and enhancing the natural beauty of the Cotswolds National Landscape and increasing the understanding and enjoyment of the National Landscape's special qualities should be identified as strategic priorities in Local Plans, Neighbourhood Plans, Local Transport Plans and other relevant plans and strategies. These plans and strategies should explicitly identify the Cotswolds National Landscape Management Plan as a material consideration.

5. The cumulative impacts of development proposals on the natural beauty of the Cotswolds National Landscape should be fully assessed.

6. A landscape-led approach should be applied to development and transport proposals in the CNL and its setting, proportionate to the type and scale of development being proposed, whereby proposals:

   a) address the natural beauty of the CNL as primary consideration at all stages of the development process (including design), from initial conception through to implementation;
   b) address all of the factors that contribute to the natural beauty of the area;
   c) address access to natural beauty including the character of the public rights of way network and its role within wider green infrastructure.
   d) reflect and enhance the character of the local area;
   e) avoid adverse effects where possible and, if adverse effects can't be avoided, minimise them; and
   f) deliver substantially more beneficial effects than adverse effects for the natural beauty of the CNL.[49]

   This landscape-led approach is particularly important for major development[50].

This policy provides principles relating specifically to development and transport. However, it is important to note that development and transport proposals should have regard to the Management Plan policies as a whole. For example, Policy CE7 (Biodiversity and Nature Recovery, paragraph 4, relating to biodiversity net gain, would be a key consideration in development proposals.

Policy CE10 refers to relevant sections of the National Planning Policy Framework (NPPF) for context, as this national policy underpins much of what Policy CE10 is seeking to achieve. However, Policy CE10 expands on this national policy by referencing relevant case law and best practice.

Planning legislation and policy affords the highest level of protection to AONBs (National Landscapes) in relation to landscape and scenic beauty -= the same level of protection as for National Parks. Although some level of development may be required to meet local (National Landscape) housing needs and to ensure that the vitality of National Landscape settlements is maintained and enhanced, development should not be at such scale that either individually or cumulatively, it erodes the special qualities of the National Landscape. This would undermine the reason for the Cotswolds being designated as an AONB (National Landscape) in the first place.

With regards to cumulative impacts, a particularly important consideration is where multiple, separate developments have been implemented or proposed in the same locality. Individually, they might not be particularly significant. However, collectively, their impacts could be significant.

In planning decisions, AONB considerations will need to be weighted in the overall planning balance alongside other relevant considerations. In line with national planning policy, great weight should be given to conserving and enhancing the natural beauty of the Cotswolds National Landscape. It is worth noting that case law has clarified that this great weight should also be applied in relation to the impact of development outside an AONBs on views from the AONB. (i.e. development in the setting of the AONB). More information on this issue is provided in the Board's position statement on Development in the Setting of the Cotswolds AONB.[51]

The factors that contribute to natural beauty include landscape quality / beauty, scenic quality / beauty, relative tranquillity (including dark skies), relative wildness, natural heritage (including biodiversity) and cultural heritage (including historic environment). These factors derive from Natural England's 'Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England'[52]. The 'special qualities' of the National Landscape are a key component of natural beauty.

Increasing traffic volume and vehicle sizes on the National Landscape's roads can lead to congestion, noise and air pollution, damage to roadside verges (with consequent drainage and soil erosion issues), reduced safety for non-motorised road users and traffic 'rat-running' along minor roads and through villages. Measures to address these issues should be integral considerations in new developments and can include lowering speed limits, the provision of suitably designed speed reduction schemes, the provision of off-road routes for non-motorised users and the provision of appropriate signage. In line with the recommendations in the Board's Tranquillity Position

[49] This was a design principle for the A417 Missing Link Scheme – see Case Study 3 in Appendix 1 of the Board's Landscape-led Development Position Statement for further details (link 1 – main document; link 2 – appendices).
[50] 'Major development', in this context, equates to the definition provided in Footnote 60 of the NPPF (link). See also Policy CE11.
[51] Cotswolds National Landscape Board (2017) *Development in the Setting of the Cotswolds AONB* (link).
[52] Natural England (2011) *Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England* (link – see Table 3 and Appendix 1).

Statement, if a development proposal would increase in traffic movements (or HGV movements) by 10% or more, this should, as a 'rule of thumb', be considered significant in terms of impact on tranquillity.[53]

The distinctive character of minor roads reflects and contributes to the character of the wider National Landscape and these roads are an important means for people to experience the National Landscape. Insensitive, over-engineered road schemes and excessive lighting can have a detrimental impact. Impacts on landscape character are addressed in Policy CE1 (Landscape).

Further information on what is meant by a landscape-led approach to development is provided in the Board's 'Landscape-led Development Position Statement'.[54] Appendix 3 of the Position Statement specifically addresses landscape-led principles for major development.

POLICY CE11: MAJOR DEVELOPMENT

1. In line with national planning policy, permission should be refused for major development within the CNL, in the context of paragraph 177 of the NPPF, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.[55]

2. Relevant stakeholders should fully assess relevant site allocations and development proposals to see if they constitute major development. In considering or deciding whether a proposed development constitutes major development, relevant stakeholders should have regard to the major development checklist in Appendix 5 of the Board's Landscape-led Development Position Statement.[56]

3. Local authorities and other relevant stakeholders should explicitly state whether they consider relevant allocations and development proposals[57] to be major development.

4. The mandatory major development 'tests' specified in paragraph 177 of the NPPF should be rigorously applied and documented for all allocations and development proposals that are deemed to be major development.

5. When relevant stakeholders are considering or applying the major development 'tests' specified in paragraph 177 of the National Planning Policy Framework (NPPF), it should be recognised that:
   - 'exceptional need' does not necessarily equate to 'exceptional circumstances';[58]
   - no permission should be given for major development save to the extent the development was needed in the public interest, met a need that could not be

[53] Cotswolds National Landscape Board (2019) *Tranquillity Position Statement* (link – see Section 4.5).
[54] Cotswolds National Landscape Board (2021) *Landscape-led Development Position Statement* (link 1 – main document; link 2 – appendices).
[55] Paragraph 177 of the NPPF (link).
[56] Cotswolds National Landscape Board (2021) *Landscape-led Development Position Statement* (link 1 – main document; link 2 – appendices).
[57] There are examples of case law where planning permissions have been quashed because the local authority (specifically, the planning committee) did not explicitly address the issue of major development and the related issue of 'exceptional circumstances' (e.g. R (Mevagissey Parish Council) v Cornwall Council [2013] EHWC3684 (Admin).
[58] This principle is recognised in relevant case law (R (Mevagissey Parish Council) v Cornwall Council [2013] EHWC 3684 (Admin) (link), paragraph 52): 'Even if there were an exceptional need … that would not necessarily equate to exceptional circumstances for a particular development, because there may be alternative sites that are more suitable because development there would result in less harm to the AONB landscape.'

addressed elsewhere or in some other way and met that need in a way that to the extent possible, moderated detrimental effect on the environment, landscape and recreational opportunities.[59]

6. When making decisions on major development proposals, local authorities (and / or other relevant decision makers) should not simply weigh all material considerations in a balance, but should refuse an application unless they meet the exceptional circumstances and public interest criteria.[60]

As with Policy CE10, Policy CE11 refers to relevant sections of the National Planning Policy (NPPF) for context, as this national policy underpins much of what Policy CE11 is seeking to achieve. However, Policy CE11 expands on this national policy by referencing relevant case law and best practice.

Paragraph 177 of the NPPF states that 'when considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest'. Footnote 60 of the NPPF explains that 'whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined' (footnote 60). This definition of major development differs from the definition in The Town and Country Planning (Development Management Procedure) (England) Order 2015[61] (or 'DMP' for short), albeit that DMP definition is still a relevant consideration in relation to footnote 60 of the NPPF.

Paragraph 172 of the NPPF specifically addresses the issue of major development in the context of planning permissions (i.e., as part of the development management process). However, legal opinion has stated that 'it would arguably amount to an error of law to fail to consider [paragraph 177] at the site allocations stage of plan making ... The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF'[62]. As such, it is appropriate to address the issue of major development at the plan-making stage as well as at the development management stage.

The 'Assessment of Site Allocations Against Major Development Considerations' undertaken by the South Downs National Park Authority in 2015[63] and 2017[64] as part of their Local Plan process is an excellent case study in this regard.

The major development checklist in the Board's Landscape-led Development Position Statement is not intended to set rigid criteria. Instead, they are intended to help guide the decision maker (and other stakeholders) through the process of assessing if a proposed development constitutes major development.

[59] R (Advearse) v Dorset Council v Hallam Land Management Ltd [2020] EWHC 807 (link). Direct quote from paragraph 35.
[60] R (Mevagissey Parish Council) v Cornwall Council [2013] EHWC 3684 (Admin) (link), paragraph 51: 'The planning committee are required, not simply to weigh all material considerations in a balance, but to refuse an application unless they are satisfied that…'
[61] https://www.legislation.gov.uk/uksi/2015/595/contents/made
[62] Landmark Chambers (2017) *In the matter of the South Downs National Park and in the matter of paragraph 116 of the NPPF* (link – see paragraph 5).
[63] South Downs National Park Authority (2015) *South Downs Local Plan Preferred Options: Assessment of Site Allocations Againts Major Development Considerations – Technical Report* (link).
[64] South Downs National Park Authority (2015) *South Downs Local Plan Pre-Submission: Assessment of Site Allocations Againts Major Development Considerations – Technical Report* (link).

Due to their scale, major infrastructure and development projects, such as roads or energy developments, are likely to have a more significant impact on the natural beauty of the National Landscape than smaller-scale developments. There is an even stronger need for these projects to be exemplars for how they have regard to the conservation and enhancement of the natural beauty of the National Landscape including its special qualities. For example, the construction phases of the A417 Missing Link scheme.

Further guidance regarding major development is provided in Appendix 9 of the Management Plan and in Section 7.3, Appendix 3 and Appendix 5 of the Board's Landscape-led Development Position Statement. [65]

[65] Cotswolds National Landscape Board (2021) *Landscape-led Development Position Statement* (link 1 – main document; link 2 – appendices)

POLICY CE12: DEVELOPMENT PRIORITIES AND EVIDENCE OF NEED

1. Housing delivery in the Cotswolds National Landscape (CNL) should be focussed on meeting affordable housing requirements, particularly housing that is affordable in perpetuity such as social rented housing.[66]

2. When local planning authorities are reviewing their Local Plans, they should give consideration to setting policies for affordable housing provision in the CNL that require:

    - at least 50% affordable housing in market housing developments;
    - 100% affordable housing on Rural Exception Sites, with a lower percentage only being permitted in exceptional circumstances and the absolute minimum being 75%;
    - on-site affordable housing provision for housing developments of five units or fewer.

3. Priority should be given to maintaining and enhancing local community amenities and services and improving access to these amenities and services. Priority should also be given to supporting local employment opportunities[67].

4. It should be recognised that:

    (a) The housing need figure derived from the Government's 'standard method' for calculating housing need is an unconstrained assessment of housing need[68] and does not present a target for housing provision[69].
    (b) The decision on how many homes should be planned for (i.e., the 'housing requirement' figure in Local Plans) should only be made after consideration of the constraints that the local authority faces, including the AONB designation, and consideration of the land that is actually available for development.[70] As such, when these constraints are factored in, the 'housing requirement' could potentially be smaller than the standard method's 'housing need' figure.
    (c) The application of national planning policies relating to AONBs may mean that it is not possible to meet objectively assessed needs (OAN) in full in local authority areas that overlap with the Cotswolds National Landscape (CNL).[71]
    (d) The CNL is unlikely to be a suitable area for accommodating unmet needs from adjoining, non-designated areas.[72] In the context of the CNL, this includes unmet needs relating to adjacent urban areas and unmet needs arising in local authority areas that do not overlap with the CNL.
    (e) Meeting housing need is never a reason to cause unacceptable harm to the CNL.[73]
    (f) The scale and extent of development in the CNL should be limited.[74]

5. Consideration should be given to whether the constraints relating to the AONB designation merit 'exceptional circumstances' which may justify using an alternative approach to the standard method for assessing housing need.[75]

6. When the allocation of sites is being considered in the Local Plan process, regard should be given to the evidence of need specific to: (i) the settlement / parish where the allocation is being proposed; and (ii) the CNL 'sub-area' within which the allocation is being proposed.

7. Within the CNL, windfall housing proposals on undeveloped land adjoining, or outside of, built up area boundaries (or equivalent) should only be supported where there is robust evidence of

a specific local housing need such as needs identified through a neighbourhood plan or affordable housing needs specific to a particular settlement.

8. Where choice-based lettings systems, such as Homeseeker Plus, are used as part of the evidence base for affordable housing need:[76]

   - the 'local connection' component of the choice-based lettings system should be applied consistently; and

   data from the choice-based lettings systems should not be used explicitly as a measure of affordable housing need unless the data has been verified and there is a clear local connection to – and preference for – the settlement in question.

9. When local authorities are reviewing their Local Plans, they should give consideration to setting policies that ensure that new market housing is used as a principal residence rather than as a second home or holiday home.

The Cotswolds National Landscape is a living and working landscape in which the social and economic wellbeing of local communities is an important consideration. Maintaining vibrant and thriving local communities is essential to the long-term future of the National Landscape. The provision of housing and services that meets local needs plays an important role in achieving these aspirations. However, these aspirations should be delivered in a way that is compatible with the purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape.

With regards to paragraphs 1 to 3 of Policy CE12, Government guidance recognises that National Parks are not suitable locations for unrestricted housing. Instead, '*the expectation is that new housing will be focussed on meeting affordable housing requirements, supporting local employment opportunities and key services*'. The same guidance requires National Park Authorities to work to '*ensure that … affordable housing remains so in the longer term*'.[77] AONBs have the same level of

[66] Sections 5.4 and 5.5 of the Board's Housing Position Statement (link 1 – main document; link 2 – appendices) provide additional context on this issue.
[67] Sections 5.4 and 5.5 of the Board's Housing Position Statement (link 1 – main document; link 2 – appendices) provide additional context on this issue.
[68] https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments. Paragraph 001.
[69] https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system#proposed-changes-to-the-standard-method-for-assessing-local-housing-need..
[70] See previous footnote. The issue of how constraints should be addressed is also covered in the Government's guidance on Housing and Economic Land Availability Assessment (link). Key extracts from this guidance are provided in Appendix 1 of the Board's Housing Position Statement (link 1 – main document; link 2 – appendices).
[71] https://www.gov.uk/guidance/natural-environment#landscape. Paragraph 041.
[72] See previous footnote. Section 5.3 of the Board's Housing Position Statement (link 1 – main document; link 2 – appendices) provides additional context on this issue.
[73] See footnote 2, above.
[74] Ministry of Housing, Communities and Local Government (2021) *National Planning Policy Framework* (NPPF) (link). Paragraph 176.
[75] Paragraph 61 of the NPPF (link) recognises that there may be exceptional circumstances that justify an alternative approach to the 'standard method', albeit that this alternative approach would still have to reflect current and future demographic trends and market signals.
[76] Sections 5.6 and 5.10 of the Board's Housing Position Statement (link 1 – main document; link 2 – appendices) provide additional context on this issue.
[77] Defra (2010) *English National Parks and the Broads – UK Government Vision and Circular 2010* (link). Paragraphs 78 and 79.

protection as National Parks, with regards to conserving and enhancing landscape and scenic beauty, and the scale and extent of development in both designations should be limited.[78] As such, it is logical to apply the same principles, outlined above for National Parks, in AONBs as well.

The targets in paragraph 2 of the Policy CE12 are based on what the Board would consider to be best practice within other protected landscapes. The Board acknowledges that these aspirations might exceed current policy in Local Plans. However, we consider that they are appropriate targets to aim for in a protected landscape, where the main focus for housing provision should be the provision of affordable housing. We acknowledge that these targets would be subject to viability assessments.

Paragraph 35 of the NPPF states that, in order to be sound, Local Plans should 'as a minimum, seek to meet the area's objectively assessed needs' (OAN). However, Government guidance also states that the application of policies in the NPPF relating to the protection of AONBs '*may mean that it is not possible to meat objectivey assessed needs in full through the plan-making process*'.[79] As such, it should be recognised that, in some circumstances, it might be appropriate for the housing requirement figure identified in development plans (that overlap with AONBs) to be less than the OAN figure.

With regards to paragraph 6 of Policy CE12, the lack of a specific housing need figure, or housing requirement figure, for the AONB 'sub-area' within which an allocation is being considered could potentially make the allocation (and the Plan) unsound. This was the case in West Oxfordshire, where the Local Plan inspector concluded that '*in the absence of a housing need figure for the Burford – Charlbury sub-area … the allocation in the plan of housing sites, and the reliance on additional windfall housing development, in the Burford – Charlbury area, over and above existing completions and commitments, would not be sound*'[80].

The wording of paragraph 7 of Policy CE12 is based on paragraph 5.39 of the West Oxfordshire Local Plan, which states that: 'Within the Cotswolds AONB, windfall housing proposals on undeveloped land adjoining built up areas … will only be supported where there is convincing evidence of a specific local housing need such as needs identified through a neighbourhood plan or affordable housing needs specific to a particular settlement, for example through a rural exception site'[81].

There is concern that second home ownership, retirement homes and buy to let have removed housing from the market that could otherwise be made available to first home owners. This results in increased demand within a reduced pool of housing stock, which inflates house prices and makes housing less affordable. The Board is particularly concerned that those who care for the landscape of the National Landscape and other key workers have an opportunity to live within it.

All of these issues. Including relevant case studies, are addressed in more detail in the Board's Housing Position Statement. The recommendations in the Housing Position Statement are based on government guidance and on best practice in the Cotswolds and other protected landscapes. Many of these recommendations have now been incorporated into Policy CE12, although the Position Statement provides additional, useful context.[82]

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[78] Ministry of Housing, Communities and Local Government (2021) *National Planning Policy Framework* (link). Paragraph 176.
[79] https://www.gov.uk/guidance/natural-environment#landscape. Paragraph 041.
[80] Planning Inspectorate (2018) *Report on the Examination of the West Oxfordshire Local Plan 2031* (link). Paragraph 219.
[81] West Oxfordshire District Council (2018) *West Oxfordshire Local Plan 2031* (link).
[82] Cotswolds National Landscape Board (2021) *Housing Position Statement* (link 1 – main document; link 2 – appendices)

POLICY CE13. WASTE MANAGEMENT AND THE CIRCULAR ECONOMY

1. Waste management should align with the following hierarchy, as set out in the Government's Waste Management Plan 2021:

    a. Prevention
    b. Prepare for reuse
    c. Recycling
    d. Other recovery
    e. Disposal

2. Measures that help to deliver a circular, or closed-loop, economy, in which waste generation is avoided, should be encouraged.

3. Proposals for new landfill sites and strategic waste facilities should not normally be permitted in the Cotswolds National Landscape. especially where they involve importing significant amounts of waste into the National landscape (for example, waste generated in neighbouring urban areas).

4. Any waste management facilities that are permitted in the National Landscape should: (i) be sited in such a way that adverse environmental impacts are minimised, in line with relevant permitting regimes; and (ii) be primarily to receive waste that arises within the National Landscape. (Within close proximity to the proposed facility).

5. The management or use of waste by way of depositing it to land as an inert 'recovery' operation, land raising and bunding or for further restoration of previous landfill operations, should only be allowed: (i) in very limited circumstances within environmental limits; (ii) where it can demonstrate a significant net-benefit for the conservation and enhancement of the natural beauty of the National Landscape; and (iii) where it complies with the policies of the relevant Waste Local Plan and relevant environmental regulations.

Communities and businesses within the Cotswolds produce a significant amount of waste which needs to be disposed of in an appropriate and safe manner. In future, efforts must concentrate on minimising waste and dealing with it in close proximity to where it is produced. The reduction of waste should be promoted by supporting policies and plans which result in re-use, reduction and recycling of waste materials and the efficient and effective collection of waste in a manner that will support its management as high up the waste hierarchy as is practicably possible

Proposed activities including development, should proactively support the transition to a circular economy throughout the Cotswold National Landscape. They should apply waste avoidance and reduction practices and adopt procurement strategies that favour the purchase of goods and services, which contribute to closing energy and material loops within supply chains

The significant number of urban areas close to the National Landscape has the potential to create pressure to import waste into the National Landscape, particularly to former quarry locations. This can generate additional lorry traffic within the National Landscape, with associated negative impacts on communities, the rural road network and roadside verges. There are also implications for the groundwater resource due to the permeable nature of limestone.

Infilling with inert waste is sometimes proposed for quarries within the Cotswolds National Landscape. The need for infilling should be minimised by ensuring that a sufficient quantity of by-

product is retained during the quarry operation to enable an appropriate restoration scheme to be achieved. Retrospective infilling may require a considerable number of HGV movements which can adversely affect the tranquillity of the National Landscape and result in unnecessary greenhouse gas emissions. As such, the potential benefits of restoring a former quarry to a more natural landform will need to be weighed in the balance against these potential adverse effects.

INCREASING UNDERSTANDING AND ENJOYMENT

Ensuring access, learning and wellbeing opportunities are for everyone.

HEALTH AND WELLBEING

OUTCOME 12 - HEALTH AND WELLBEING: The National Landscape plays a full part in improving the nation's health, benefitting the mental and physical wellbeing of those who experience it.

POLICY UE1: HEALTH AND WELLBEING

1. Opportunities for improving health and wellbeing in the Cotswolds National Landscape should be created, improved and promoted, including, where appropriate, the provision of: green spaces or water within easy reach of communities, walking, cycling and riding routes, including routes for disabled people; opportunities to access and interact with nature; and volunteering and personal development opportunities.

2. Children and young people resident within and around the National Landscape should be provided with environmental education opportunities to experience the Cotswolds National Landscape through direct contact with the natural environment.

3. The health sector should make greater use of the benefits that the National Landscape provides for the health and wellbeing of residents and visitors, for example, by prescribing exercise in the Cotswolds National Landscape countryside.

A lack of physical activity can lead to a variety of chronic diseases and conditions such as obesity, diabetes and heart disease which, combined with an ageing population, is leading to a public health crisis. A lack of access to scenic, wildlife-rich greenspace and other open spaces can also adversely affect mental health. Many people, particularly children and young people, do not readily have opportunities to learn about the environment or to develop an understanding and appreciation of the Cotswolds countryside.

The health and wellbeing benefits of volunteering in the countryside cannot be underestimated. Volunteering helps to improve physical health, and working and walking in the outdoors can also help with a variety of mental health challenges such as social isolation, bereavement and low confidence and self-esteem. The variety of opportunities available across the National Landscape and wider partnership of organisations needs to be more clearly signposted.

There is a need to implement and develop a variety of approaches to address these issues, including the provision of outdoor activities and experiences. There is also a need to promote the link between physical and mental health and enjoying and understanding the special qualities of the National Landscape. This should include encouraging more partnership working between health professionals and other stakeholders to implement measures such as 'green' prescriptions (for

example, prescribing walks in the Cotswolds National Landscape). Where appropriate, links should be developed between these health and wellbeing aspirations and the enhancement of ecological networks and the provision of green infrastructure.

ACCESS AND RECREATION

OUTCOME 13 - ACCESS AND RECREATION: The Cotswolds is recognised as a welcoming place, where barriers to access are being removed and everyone feels connected to the landscape.

POLICY UE2: ACCESS AND RECREATION

1. A safe, pleasant, accessible, clearly waymarked and well-connected Public Rights of Way network should be maintained, enhanced and promoted across the Cotswolds National Landscape.

2. Improvements to rights of way must be undertaken in a way that minimises any adverse effects on the natural beauty of the National Landscape and on its special qualities. Innovative ways of providing named routes without introducing additional signage should be explored.

3. Open Access Land and other land including Country Parks, that is open to public access [83] should be maintained, enhanced and promoted across the Cotswolds National Landscape. Where appropriate, more land should be made available for public access.

4. Sustainable funding for National Trails, including the Cotswold Way and Thames Path, should be secured.

5. Visitors, residents and local communities should be provided with opportunities to increase their understanding and enjoyment of the special qualities of the Cotswolds National Landscape.

6. A priority for engagement in the National Landscape should be individuals who are not currently enjoying or engaged with the benefits of the landscape. Particularly those from within the National Landscape and from the surrounding urban areas, especially those from areas of high deprivation and those that are not traditional visitors to the Cotswolds.

7. Easily accessible online, downloadable and onsite resources for walking, cycling, horse riding, volunteering and educational activities should be provided in the National Landscape to help promote access to the area and understanding and appreciation of its special qualities.

8. Visitor facilities and routes that are accessible to those of all abilities should be provided.

9. Guided walks and activities for those who are not confident walking in the countryside should be provided to increase confidence and share knowledge of the National Landscape and its special qualities.

10. Arts and cultural experiences should be provided to encourage people to deepen their emotional connection to the landscape and support the engagement of new and existing audiences.

11. The Countryside Code should be promoted to educate visitors and communities to act appropriately in the countryside and to improve understanding between visitors and those living and working in the area.

12. The provision of new, and level of use of existing access and recreational opportunities should not have a significant adverse impact on the Cotswolds National Landscape. Where recreational use is having or is likely to have, an adverse impact on the special qualities of the National Landscape or on the integrity of existing wildlife sites, steps should be taken to evaluate, prevent or mitigate these impacts. Such steps can include enhanced maintenance and wayfinding, onsite engagement, legal restrictions, and the provision and promotion of access and recreational opportunities in new alternative suitable locations.

13. Where irreconcilable conflicts exist between conservation and public enjoyment in the Cotswolds National Landscape, then conservation interest should take priority.

The use of the term "everyone" within the wording of this outcome is deliberate and is intended to promote equality, diversity and inclusion.

The extensive 3000 miles of public rights of way network provides a huge opportunity to enhance public enjoyment and appreciation of the CNL. For some people, due to financial, health or cultural reasons there are barriers to accessing and enjoying this network. These barriers should be broken down and access provision should be adapted and extended where possible to reach the widest demographic and people of all abilities both inside the National Landscape and in the surrounding urban areas. The access offer needs to have a wide geographical spread and offer opportunities for people walking, cycling, horse riding and users of off-road mobility scooters, wheelchairs and pushchairs where appropriate and legal access allows.

The Landscapes Review published by Julian Glover in 2019 challenged Protected Landscapes to do more to welcome people, and to do a lot more to ensure that people from currently underrepresented groups can enjoy the benefits of accessing them too.

Partners including the National Landscape Board, Highway Authorities, Parishes and landowners should work together to improve rights of way furniture, surfacing and facilities for the benefit of everyone.

Digital platforms such as websites and social media should be used, alongside targeted communications in more difficult to reach communities to promote the extensive guided walks and guided walks programme that will appeal to a variety of audiences.

Offering high quality arts and cultural experiences which encourage people to deepen their emotional connection to the landscape will be an important part of how new and existing audiences are engaged in the future. Weaving thought-provoking and inspiring arts and culture activity into access and recreation work has the potential to connect people with nature and the landscape. The Arts in the Landscape strategy, led by the National Association of AONBs, and adopted by the Cotwolds National Landscape Board in 2021 will support this work.

Lack of long-term funding from Natural England for National Trails makes long-term planning, maintenance and promotion more challenging. On-going partnership working with the Cotswold Way Association (CWA) and new National Trails Charity (NTUK) will be key to the long term sustainability of the Trails.

The recreational use of the National Landscape should not be allowed to adversely affect the National Landscape's special qualities. For example, measures will need to be put in place to minimise and mitigate recreational pressure arising from new developments both inside and outside the National Landscape, especially where these developments are located close to sensitive locations, such as designated nature conservation sites.

The prioritisation of 'conserving' over 'public enjoyment' is known as the 'Sandford Principle', after Lord Sandford, who chaired the National Parks Policy Review Committee between 1974 and 1974.

[83] This includes access land under the Countryside and Rights of Way Act 2000 (which includes commons) and where public access is permitted on land managed by landowners, non-government organisations and charities such as the National Trust, the Wildlife Trusts and the Woodland Trust.

This principle is embedded in the Countryside and Rights of Way Act 2000, in relation to Conservation Boards.[84]

SUSTAINABLE TOURISM

OUTCOME 14 - SUSTAINABLE TOURISM: Businesses and visitors have a shared commitment to contribute to the conservation and enhancement of the natural beauty of the National Landscape.

POLICY UE3: SUSTAINABLE TOURISM

1. Tourism within the Cotswolds National Landscape is delivered and managed in a way that minimises adverse effects on the natural beauty of the National Landscape and the emission of greenhouse gases.

2. Visitors, residents, local businesses and communities should be provided with opportunities to directly contribute to conserving and enhancing the natural beauty of the Cotswolds National Landscape and improve access to the area through local individual, community and employee volunteering opportunities.

3. The 'Caring for the Cotswolds' visitor giving scheme will raise awareness of the National Landscape and generate funds from visitors to directly help look after it by supporting projects which conserve habitats and species, look after heritage and landscape, improve access, and help provide education resources encouraging people to understand the landscape and nature better.

4. Visitors should be provided with a variety of accommodation options over a range of prices. The siting and design of visitor accommodation should be compatible with conserving and enhancing the natural beauty of the National Landscape including its special qualities.

5. Air travel arising from the Cotswolds as a destination should be minimised.

6. Existing sustainable and integrated transport initiatives should be supported and new initiatives developed to help facilitate the car free visitor experience.

The natural beauty of the Cotswolds National Landscape is the foundation on which the tourism industry in the Cotswolds is based. This natural beauty is an asset which needs to be managed and maintained. The tourism sector should, therefore, contribute to the conservation and enhancement of this natural beauty. New tourism products that increase the sustainable tourism offer should be encouraged. Further research and evidence are needed to better understand the impacts and patterns of tourism in the National Landscape to ensure it remains sustainable. Updated visitor and tourism survey data would help to underpin Policies UE2 and UE3.

A recent carbon footprint assessment of the National Landscape[85] has calculated that each year visitors are responsible for 308,806 tCO2 whilst in the National Landscape, and 1,134,848 tCO2 when travelling to and from it. 48% of the second figure is caused by flights. The tourism sector locally

[84] https://www.legislation.gov.uk/ukpga/2000/37/section/87

[85] Small World Consulting. A Carbon Footprint Assessment of the Cotswolds National Landscape. 2022 (unpublished)

(accommodation, attractions, food and drink etc) should be moving towards becoming net zero through both how it operates within the National Landscape and by targeting closer audiences.

Though there is generally a significant level of appreciation for the Cotswolds landscape amongst visitors, awareness and understanding of its status as a protected landscape and the implications of this are lacking. This reduces awareness of the need for protection and enhancement of the sense of place and its distinctive features and special qualities.

Limited availability of low-cost accommodation, including camping, can exclude families and those on low incomes from staying in the area, reducing the diversity of visitors. Provision of such accommodation should be compatible with the purpose of conserving and enhancing natural beauty.

The limited provision of public transport - and limited integration of this provision - restricts the scope for visitors (and residents) without a car to explore the Cotswolds resulting in a heavy reliance on car usage. Transport providers should be supported to increase and promote integrated travel initiatives in order to encourage a car-free visitor experience.

Most of the local authorities across the National Landscape, together with the Board, have joined together to form Cotswolds Tourism, the Destination Management Organisation (DMO) for the Cotswolds. However, further collaboration is needed to ensure the entire National Landscape is covered by a proactive and joined-up DMO which works proactively with neighbouring DMOs.

CHAPTER 8. DELIVERY AND MONITORING

COTSWOLDS NATIONAL LANDSCAPE BOARD DELIVERY

The Board will play an important role in delivering the vision, outcomes and policies of the Management Plan. How the Board will contribute to the delivery of the Management Plan is set out in a three yearly Business Plan Framework which in turn is delivered through an annual work programme. Together these show how the vision, outcomes and policies of the Management Plan are translated into measurable actions for the Board.

STAKEHOLDER DELIVERY

Although the Board is the body responsible for preparing and publishing the Management Plan and will play an important role in its delivery, the Board doesn't actually own or directly manage any of the land in the National Landscape or its setting. As such, the policies of the Management Plan are also intended to guide the work of other stakeholders in helping to deliver the Management Plan's vision and outcomes.

The detail of how other stakeholders contribute to the delivery of the Management Plan is too complex to cover in this Management Plan, particularly given that the National Landscape cuts across 15 local authority areas. However, the 'Stakeholder Delivery' table in Appendix 5 outlines the key actions that the Board invites specific stakeholders to undertake in order to help deliver the Management Plan. The actions and policies listed in the table are not intended to be exhaustive.

In essence, stakeholders are asked to:

- have regard to the Management Plan, including its vision, outcomes and, perhaps most importantly, its policies;
- incorporate the Management Plan's vision, outcomes and policies into their own plans, policies, proposals, work programmes and decisions, where appropriate.

MONITORING

The National Landscape Board will monitor and evaluate its contribution to the delivery of the Management Plan through the quarterly and annual review of its work programme. The 'State of the Cotswolds Report' – together with other local and national monitoring and surveys - will contribute to the provision of evidence, which is a crucial part of managing the National Landscape.

Where practicable the Board will monitor the key actions identified in the 'Stakeholder Delivery' table in Appendix 5 and compliance with the 'duty of regard' (see Appendix 4).

The delivery of the Management Plan will be monitored through a suite of monitoring indicators which have been developed for each policy. These are listed in Appendix 6.

APPENDICES

APPENDIX 1. NATIONAL LANDSCAPE (AONB) DESIGNATION

The Cotswolds National Landscape was designated as an Area of Outstanding Natural Beauty (AONB) in 1966 and extended in area in 1990. At 790 square miles, or 2038 square kilometres, it is the largest AONB and the third largest protected landscape in England.

Although AONB remains the legal names of the designation the Board of the Cotswolds Conservation Board decided in June 2020 to use the name National Landscape for the area designated as an AONB and the name Cotswolds National Landscape Board for the Cotswolds Conservation Board.

This plan uses the term National Landscape for the designated area and National Landscape Board for the organisation. It still refers to AONBs when referring to the use of the designation nationally or areas outside of the Cotswolds.

AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them[86]. They have the same landscape status as National Parks.

The statutory purpose of AONB designation is to conserve and enhance their natural beauty[87]. AONBs are designated in law following a prescribed process which includes an objective appraisal of landscape quality, statutory assessments by the national conservation agencies and wide consultation with stakeholders including local landowners, residents and businesses[88].

Each AONB has been designated by reason of its 'special qualities'. These include the flora, fauna, historical and cultural associations as well as landscape and scenic views, as outlined in Chapter 2 of the Management Plan.

AONBs exist within a legal framework which has been progressively strengthened since the first AONBs came into existence after the Second World War. The primary, or enabling, legislation for the designation of AONBs was the National Parks and Access to the Countryside Act 1949. The Countryside and Rights of Way (CRoW) Act 2000 subsumed and strengthened the AONB provisions of the 1949 Act. It confirmed the purpose and significance of AONBs, clarified the procedure for their designation, and created a firm legislative basis for their designation, protection and management. The Act also provided for the establishment of Conservation Boards to manage AONBs -see Appendix 3.

Areas of Outstanding National Beauty are part of a family of protected areas recognised and classified by the International Union for the Conservation of Nature (IUCN) throughout the world. IUCN recognises AONBs and National Parks in England and Wales as Category V Protected Landscapes – a protected area whose special qualities are the result of the interaction between people and nature. They are managed mainly for landscape protection and recreation.

[86] Department for Environment, Food and Rural Affairs (Defra) (2015) *Areas of Outstanding Natural Beauty: Landscape Protection and Enhancement Support Scheme (England) 2015 – 17. Application to European Commission.*

[87] Section 82, Countryside and Rights of Way Act 2000

[88] National Association of AONBs (2018) *AONB Management Plan Revision. Specimen text: policy and legal framework.*

APPENDIX 2. NATURAL BEAUTY

The concept of natural beauty is one of the cornerstones of legislation to protect landscapes in the UK. It has been the basis for the designation of AONBs and National Parks since the 1949 National Parks and Access to the Countryside Act.

Natural beauty goes well beyond scenic or aesthetic value. It encompasses everything that makes an area distinctive: geology, climate, soil, plants, animals, communities, archaeology, buildings, the people who live in it, past and present, and the perceptions of those who visit it[89]. It is widely accepted that natural beauty is, in part, due to human intervention, such as agriculture[90].

Natural England has developed a list of natural beauty criteria[91] to be used when assessing landscapes for designation as AONBs or National Parks, as outlined in the table below. It is Natural England's view that the practical application of the natural beauty criteria is identical for National Park and AONB designations, despite there being differences in the degree to which the criterion is clarified in the legislation[92]. So, for example, the extent to which wildlife and cultural heritage are factored into natural beauty assessments by Natural England is the same for both AONBs and National Parks. It is also the Government's formal position that the natural beauty required of an AONB and a National Park are the same[93].

Table of factors related to natural beauty[94]

Landscape quality This is a measure of the physical state or condition of the landscape.
Scenic quality The extent to which the landscape appeals to the senses (primarily, but not only, the visual senses).
Relative wildness The degree to which relatively wild character can be perceived in the landscape makes a particular contribution to sense of place.
Relative tranquillity The degree to which relative tranquillity can be perceived in the landscape.
Natural heritage features The influence of natural heritage on the perception of the natural beauty of the area. Natural heritage includes flora, fauna, geological and physiographical features.
Cultural heritage The influence of cultural heritage on the perception of natural beauty of the area and the degree to which associations with particular people, artists, writers or events in history contribute to such perception.

The list is not intended to be exhaustive and other factors may be relevant in some circumstances. Not all factors will be relevant in every case.

[89] Countryside Agency (2001) *Areas of Outstanding Natural Beauty Management Plans. A guide*. Countryside Agency Publications. West Yorkshire.
[90] Natural England (2011) *Guidance for assessing landscapes for designation as National Park or Areas of Outstanding Natural Beauty in England.*
[91] See Footnote 36.
[92] See Footnote 36.
[93] See Lords Hansard 20 Mar 2006 (Col 51) and Commons Hansard 13 June 2000 (Col 556W).
[94] Table extracted from the Natural England guidance – see footnote 43.

APPENDIX 3. COTSWOLDS NATIONAL LANDSCAPE BOARD

The Cotswolds Conservation Board ('the Board') was established by Parliamentary Order[95] in 2004. It was renamed as the Cotswolds National Landscape Board for most purposes in June 2020 (although the legal name remains unchanged). It has two statutory purposes[96]:

- To conserve and enhance the natural beauty of the Cotswolds National Landscape.
- To increase the understanding and enjoyment of the special qualities of the Cotswolds National Landscape.

In fulfilling these purposes, the Board has a duty to seek to foster the economic and social well-being of local communities within the National Landscape[97].

These purposes and duties are modelled on those of the National Park Authorities. In circumstances where the two purposes are irreconcilable, the Board must give priority to conserving and enhancing the natural beauty of the National Landscape[98].

The Board consists of 37 members, of whom 15 are nominated by local authorities, eight by parish councils and 14 are appointed by government. The Board's work programme is administered by a small team of staff, supported by a network of Cotswold Voluntary Wardens who deliver a programme of practical projects and guided walks across the National Landscape. It is one of only two Conservation Boards in England, the other being the Chilterns Conservation Board.

The Board has a statutory responsibility, under the Countryside and Rights of Way Act (CRoW) 2000, to draft and publish the Cotswolds National Landscape Management Plan and to review it at least every five years. The Board's work programme for how it will contribute to the delivery of the Management Plan is set out in the Board's separate, rolling, three-year Business Plan.

The Board has a series of functions or powers that it shares with the Local Authorities, as specified in the Board's Establishment Order.

As the only organisation with responsibilities for the Cotswolds National Landscape as a whole, the Board produces a variety of publications and guidance. This is to facilitate a consistent and coordinated approach across the whole of the National Landscape, which puts the purpose of National Landscape designation at the heart of plans, proposals, decisions and work programmes affecting the National Landscape.

Board publications that are of particular relevance to the Management Plan – and which are referred to in some of the Management Plan policies and or supporting text - are outlined below:

- **Cotswolds National Landscape - Landscape Character Assessment (LCA)** [99]**:** The LCA provides an assessment of the character, distinctiveness and qualities of the Cotswolds National Landscape. It also identifies and describes the National Landscape's component

[95] The Cotswolds Area of Outstanding Natural Beauty (Establishment of Conservation Board) Order 2004
[96] Section 87, Countryside and Rights of Way Act 2000, as amended by the NERC Act 2006.
[97] Section 87 of the CROW Act specifies that, '*a conservation board … shall for that purpose* [i.e. fostering social and economic well-being] *co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty*'.
[98] This prioritisation of conserving and enhancing is known as the 'Sandford Principle', after Lord Sandford, who chaired the National Parks Policy Review Committee between 1971 and 1974.
[99] https://www.cotswoldsaonb.org.uk/our-landscape/landscape-character-assessment/

landscape character types (LCTs). It identifies 19 different LCTs in the Cotswolds National Landscape.

- **Cotswolds National Landscape - Landscape Strategy and Guidelines**[100]**:** The Landscape Strategy and Guidelines provides an overview of the forces for change that are influencing the landscape of the Cotswolds National Landscape and outlines a series of landscape and land management strategies to help guide change in a positive and sustainable way. It is intended to help developers, local planning authorities, land managers and other decision makers to make informed decisions about the suitability of proposed development - or other changes - within each of the LCTs.

- **Cotswolds Nature Recovery Plan**[101]**.** The Nature Recovery Plan represents a detailed look at the species and habitats of the Cotswolds and what should be done to enable their recovery and adaptation to climate change. It sets priorities and targets for natures recovery and describes the measures that can achieve it.

- **Positions Statements**[102]**:** The Board issues a number of Position Statements, which 'amplify' specific policies in, or add new policies to, the Management Plan. They contain further background information and recommended good practice. They are reviewed and updated on a regular basis.

- **Cotswolds National landscape Local Distinctiveness and Landscape Change**[103]**:** This document aims to assist a wide range of stakeholders to broaden their understanding of what makes the Cotswolds National Landscape special and different from other parts of the country.

- **The Cotswolds National Landscape Climate Change Strategy**[104] (adopted by the National Landscape Board in February 2022). This summarises our current understanding of the climate change impacts on the Cotswolds and what stakeholders can do to both adapt to and mitigate these impacts.

[100] https://www.cotswoldsaonb.org.uk/our-landscape/landscape-strategy-guidelines/
[101] https://www.cotswoldsaonb.org.uk/looking-after/cotswolds-nature-recovery-plan/
[102] https://www.cotswoldsaonb.org.uk/our-landscape/position-statements-2/
[103] Cotswolds Conservation Board (2003) *Cotswolds Area of Outstanding Natural Beauty – Local Distinctiveness and Landscape Change.* Produced by Latham Architects for the Cotswolds AONB Partnership.
[104] https://www.cotswoldsaonb.org.uk/wp-content/uploads/2022/03/CNL-Climate-Change-Strategy-Adopted-Feb-2022.pdf

APPENDIX 4. THE 'DUTY OF REGARD'

Section 85 of the Countryside and Rights of Way (CRoW) Act 2000 states that:

- *In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty*.

This duty is known as the 'duty of regard' (or the 'duty to have regard'). It is the equivalent of Section 96 of the Environment Act 1995, which provides for a duty of regard in National Parks.

In this context, 'relevant authority' includes any:

- Minister of the Crown;
- public body;
- statutory undertaker;
- person holding public office.

Guidance on the duty of regard, published by Defra in 2005, provides an indicative - but not exhaustive - list of relevant authorities[105].

The duty of regard is intended to ensure that the purpose for which an AONB has been designated (i.e. to conserve and enhance the natural beauty of the AONB) is recognised as an essential consideration in any decisions or activities that impact on the AONB, with the expectation that adverse impacts will be avoided or mitigated where possible[106]. Relevant authorities will also be expected to have regard to this purpose where activities outside the boundaries of an AONB may have an impact within the AONB[107].

The use of the word 'duty' in the legislation means that having regard to AONB purposes is something all 'relevant authorities' must do: it is not discretionary. This point is reinforced by use of the word 'shall' rather than, for example, 'may'[108].

Relevant authorities are expected to be able to demonstrate that they have fulfilled the duty of regard. Where their decisions may affect AONBs, they should be able to clearly show how they have considered the purpose of AONB designation in their decision making. The Defra guidance, together with guidance published by Natural England[109], considers it to be good practice for the relevant authority to:

- **consider the duty of regard at several points** in any decision-making process or activities, including during initial thinking, at more detailed planning stages, and at implementation;
- **provide written evidence** that they have had regard and considered whether it is, or is not, relevant;
- **undertake and make publicly available an assessment** of any policy, plan, programme or project which is likely to affect land within these areas;

[105] Defra (2005) *Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty and the Norfolk and Suffolk Broads*. Defra Publications. London
[106] Natural England (2010) *England's statutory designated landscapes: a practical guide to your duty of regard.*
[107] See Footnote 48.
[108] See Footnote 48.
[109] See Footnote 48.

- ensure that decisions affecting these areas are **properly considered and recorded** in high level policy documents and public statements;
- **set out the actions they have taken to comply** and any examples of good practice;
- **make reference to the duty of regard** in their annual reports and/or other appropriate monitoring documents.

Relevant authorities are encouraged to followthis best practice guidance when seeking to fulfil their statutory duty of regard.

In line with the Defra and Natural England guidance on the duty of regard, the Board will monitor compliance with the duty of regard. For example, with regards to planning, we will monitor whether planning decisions have addressed relevant considerations. Where appropriate, we will liaise with relevant local planning authorities to help resolve any issues.

On a related point, it is worth noting that Section 84 of the CRoW Act states that:

- *A local planning authority whose area consists of or includes the whole or any part of an area of outstanding natural beauty has power … to take all such action as appears to them expedient for the accomplishment of the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty or so much of it as is included in their area.*

There are many opportunities for relevant authorities and other organisations to take a proactive approach to supporting the purpose of AONB designation and management of the AONB. As stated in the Defra guidance, the duty of regard provides an '*opportunity for all relevant authorities to show their commitment to conserving and enhancing our finest landscapes, to which end clear public expressions of this commitment would be helpful to all'*.

APPENDIX 5. STAKEHOLDER DELIVERY – PRIORITY ACTIONS

National Landscape Board Delivery

How the National Landscape Board will contribute to the delivery of the Management Plan is set out in a three yearly Business Plan Framework which in turn is delivered through an annual work programme.

Recommended Stakeholder Actions

Every individual and organisation with an interest in the National Landscape can help make this plan's vision and outcomes a reality by contributing its delivery. Many of these stakeholders already make a significant contribution to delivery. This 'Stakeholder Delivery' table provides an indication of the key measures that the Board invites specific stakeholders to undertake in order to help deliver this plan.

Stakeholder	Key measure (i.e. 'if you do nothing else to support the implementation of the Management Plan, please do this')	Most relevant policies
All stakeholders	Have regard to the Cotswolds National Landscape Management Plan and other National Landscape guidance. This should include helping to deliver the vision, outcomes and policies of the National Landscape Management Plan by: (i) addressing them – and, where appropriate, adopting them - in relevant plans, policies, proposals, work programmes, decisions and actions; and (ii) recognising them as priorities for investment.	CC3, CE1, CE3, CE8, CE10
All 'relevant authorities'[110]	Comply with Section 85 of the Countryside and Rights of Way Act (the 'duty of regard') and have regard to the supporting guidance published by Defra and Natural England.	CC7
Department for the Environment, Food and Rural Affairs (Defra)	Ensure that the Government's response to the Landscapes Review published in 2019, enhances the level of protection afforded to AONBs and champions their value to the nation.	CC6, CE10
	Following the Government's review of protected landscapes, publish new guidance on protected landscapes[111], reinforcing the role and purpose of our protected landscape family.	CC6, CE1, CE8, CE10
	Review the Government's guidance on 'the duty of regard' to make the duty more robust.	CC7
	Ensure that Environmental Land Management and rural development support mechanisms contain measures appropriate for the Cotswolds National Landscape.	CE8
Department of Levelling Up, Housing and Communities	Publish new guidance, to accompany the National Planning Policy Framework, which clarifies and explains: • the meaning of 'highest status of protection'; • that development in AONBs should be limited; • what the development priorities should be for AONBs (i.e. affordable housing and improvement of services);	CC6, CE10, CE11, CE12

[110] As defined in Section 85 of the Countryside and Rights of Way Act 2000, which is explained in Appendix 4. Includes all public bodies and statutory undertakers.

[111] For example, an updated version of '*English National Parks and the Broads. UK Government Vision and Circular 2010*' (Defra, 2010), but which would also address NATIONAL LANDSCAPEs.

Stakeholder	Key measure (i.e. 'if you do nothing else to support the implementation of the Management Plan, please do this')	Most relevant policies
	• what constitutes 'exceptional circumstances' and 'in the public interest', in the context of major development.	
Natural England	Support the establishment and delivery of Environmental Land Management and rural development support mechanisms specifically for the Cotswolds National Landscape.	CE8
	Provide funding for National Trails through three-year rolling funding streams, and provide cohesive national co-ordination for the long term.	UE2
	Ensure that Natura 2000 sites, National Nature Reserves and SSSIs are brought into good condition.	CE7
Forestry Commission	Develop and support land management and rural development support mechanisms appropriate for the Cotswolds National Landscape.	CE8, CE7
	Ensure that publicly funded woodland creation schemes reflect Cotswolds National Landscape Board guidance including the Landscape Strategy and Guidelines and the Nature Recovery Plan.	CE1, CE7
Environment Agency	Support the delivery of the Cotswold Nature Recovery Plan and the River Valleys Nature Improvement Area, for example, through appropriate policies and actions in River Basin and Catchment Management Plans.	CE7
	Lead on the delivery of actions to implement the Water Framework Directive.	CC5
Historic England	Facilitate greater access to the Cotswolds National Landscape Historic Landscape Character Assessment and Historic Environment Records.	CE6
	Work with other stakeholders to enhance the interpretation of core properties and scheduled ancient monuments.	CE6
	Support measures to ensure that scheduled ancient monuments are brought into good condition.	CE6
Health and Wellbeing Boards	Commission health walks and conservation activity as an adjunct or alternative to normal prescription treatment.	UE1
	Invest in programmes to help deprived communities, within the Cotswolds National Landscape and surrounding areas, overcome barriers preventing them from realising the mental and physical health benefits of enjoying the National Landscape.	UE2
Local Enterprise Partnerships	Support the development of funding mechanisms that leverage private finance to provide for payments for ecosystem services.	CE8, CE10, CE1, UE3
Local Authorities	Endorse the Cotswolds National Landscape Management Plan.	
	Recognise the Cotswolds National Landscape Management Plan as a material consideration in Local Plans and in planning decisions.	CE10
	Include a policy specifically about the Cotswolds National Landscape in Local Plans, which specifies how the purpose of National Landscape designation will be achieved in the Local Plan area.	CE10

Stakeholder	Key measure (i.e. 'if you do nothing else to support the implementation of the Management Plan, please do this')	Most relevant policies
	Ensure that Local Nature Recovery Strategies take account of the outcomes, priorities and measures of the Cotswolds Nature Recovery Plan.	CE7
	Prioritise the provision of affordable housing to meet identified local needs arising from within the National Landscape.	CE12
	Maintain and enhance public access, roads, public transport and countryside management, in line with the policies of the Cotswolds National Landscape Management Plan.	UE2, CE10, UE3, CE1, CE6, CE7, CE8
Town and Parish Councils and Parish Meetings	Use the Cotswolds National Landscape Management Plan and Landscape Strategy and Guidelines to inform Neighbourhood Plans, Parish Plans and Village Design Statements and when considering planning applications.	CC6, CC7, CE10, CE12
	Celebrate and promote the fact that the town or parish lies within the Cotswolds National Landscape by: • utilising National Landscape boundary markers; • incorporating 'within the Cotswolds National Landscape' text in village or town entry signs; • providing information about the Cotswolds National Landscape on information panels and displays in the town or parish.	UE2
Conservation organisations	Help to halt and reverse declines in priority habitats and species.	CE7
	Help to establish and manage coherent and resilient nature recovery networks that join up across the National Landscape as outlined in the Cotswolds Nature Recovery Plan.	CE7
Historic environment and cultural heritage organisations	Support the conservation, enhancement, promotion and monitoring of the historical environment and cultural heritage of the Cotswolds National Landscape.	CE6
Farmers, landowners, land managers and related organisations	Use the Cotswolds National Landscape Management Plan and guidance published by the Cotswolds Conservation Board, including the Landscape Strategy and Guidelines and Cotswolds Nature Recovery Plan, to inform investment, development, and land management decisions and actions.	All
	Ensure that environmental land management and rural development support mechanisms support the Cotswolds National Landscape's policies and guidance.	CE8
Tourism organisations and tourism providers	Support the development of and contribute to the Caring for the Cotswolds visitor giving scheme.	UE3
	Support a coordinated approach to tourism across the whole of the Cotswolds, including the implementation of the Cotswolds Destination Management Plan (published in 2014).	CC6, UE2, UE3
Geology Trusts	Support the conservation and enhancement of geological and geomorphological features in the Cotswolds National Landscape.	CE2
	Support the increased understanding and awareness of geological and geomorphological features in the Cotswolds National Landscape.	CE2

Stakeholder	Key measure (i.e. 'if you do nothing else to support the implementation of the Management Plan, please do this')	Most relevant policies
Developers and infrastructure providers (including utilities, rail and highways)	Avoid adverse impacts on the Cotswolds National Landscape resulting from development and infrastructure provision. Mitigate unavoidable impacts and, as a last resort, compensate for impacts that cannot be mitigated on site, for example, by enhancing visual amenity.	CE1, CE10
	Ensure that any major infrastructure projects that are permitted in the Cotswolds National Landscape are 'landscape-led'[112].	CE11

[112] See Policy CE11, paragraph 2, for more details on what 'landscape-led' means in this context.

APPENDIX 6. MONITORING INDICATORS

MANAGEMENT PLAN OUTCOMES AND POLICIES

CROSS CUTTING

Climate Action (Outcome 1)

Policy CC1 – Climate Change Mitigation

- Indicator 1: Total output from new renewable energy schemes permitted in the Cotswolds National Landscape.
- Indicator 2: Endorsement by the National Landscape Board and adoption by partners of a path to Net Zero emissions for the National Landscape (or better) by 2050 (or sooner), including clear, measurable targets.
- Indicator 3: Extent of tree canopy and woodland cover (Ha)

Policy CC2 - Climate Change Adaptation

- Indicator 4: Research into the predicted impacts of climate change on the Cotswolds National Landscape.

Natural and Cultural Capital (Outcome 2)

Policy CC3 – Natural and Cultural Capital Principles

- Indicator 5: Extent to which the natural and cultural capital of the Cotswolds National Landscape has been assessed and evaluated.

Policy CC4 – Soils

- Indicator 6: Area of land under agri-environment/Environmental Land Management schemes for soil management.

Policy CC5 - Water

- Indicator 7: % of water bodies achieving 'good' ecological status.

Working Together (Outcome 3)

Policy CC6 - Developing a Consistent Coordinated and Landscape-led Approach

- Indicator 8: % of respondents 'highly valuing' the Cotswold National Landscape in residents & visitor surveys.

Policy CC7 – Compliance with Section 85 of the CRoW Act

- Indicator 9: % of planning decisions that demonstrably have regard to the purpose of National Landscape designation.
- Indicator 10: % of planning decisions that are made in line with CNL Board recommendations.

Policy CC8 - Working Together (see Indicator 8)

CONSERVING AND ENHANCING

Landscape (Outcome 4)

Policy CE1 – Landscape

- Indicator 11: Changes to landscape character identified through fixed-point photography.

Policy CE2 – Geology

- Indicator 12: Condition of designated geological sites.

Local Distinctiveness (Outcome 5)

Policy CE3 – Local Distinctiveness

- Indicator 13: Publication of development design guidance.

Tranquillity (Outcome 6)

Policy CE4 – Tranquillity

- Indicator 14: % of National Landscape recorded as 'most tranquil'.

Dark Skies (Outcome 7)

Policy CE5 – Dark Skies

- Indicator 15: % of National Landscape affected by light pollution.

Historic Environment and Cultural Heritage (Outcome 8)

Policy CE6 – Historic Environment and Cultural Heritage

- Indicator 16: Area of land under agri-environment/Environmental Land Management schemes for the management and protection of archaeological features.
- Indicator 17: Number of sites identified as Heritage at Risk.

Biodiversity and Nature Recovery (Outcome 9)

Policy CE7 – Biodiversity and Nature Recovery

- Indicator 18: SSSI condition.
- Indicator 19: % of area of priority habitats managed under agri-environment/Environmental Land Management schemes.
- Indicator 20: Extent of wildlife rich habitat (Ha) created or restored outside of protected sites.
- Indicator 20: Extent of habitats (Ha) within a nature recovery network

Rural Land Management (Outcome 10)

Policy CE8 – Rural Land Management

- Indicator 21: % of land (including woodland) managed under agri-environment/Environmental Land Management schemes.
- Indicator 22: Establishment of a Cotswolds-specific package of Environmental Land Management and rural support payments.

Policy CE9 – Problem Species, Pests and Diseases

- Indicator 23: Extent of tree pests and diseases.

Development and Transport (Outcome 11)

Policy CE10 – Development and Transport Principles

- Indicator 24: Number of adopted Local Plans with policy-level reference to the Cotswolds National Landscape Management Plan.

Policy CE11 – Major Development

- Indicator 25: Number of major developments permitted by local planning authorities.

Policy CE12 – Development Priorities and Evidence of Need

- Indicator 26: Number of new housing units permitted.

Policy CE13 – Waste Management and the Circular Economy

- Indicator 27: Number of landfill and strategic waste management sites permitted.

UNDERSTANDING AND ENJOYMENT

Health and Well-being (Outcome 12)

Policy UE1 – Health and Wellbeing

- Indicator 28: Number of educational projects run by the Cotswold Voluntary Wardens.

Access and Recreation (Outcome 13)

Policy UE2 – Access and Recreation (see also Indicator 8):

- Indicator 29: Number of improvements made to the Public Rights of Way network by the Cotswold Voluntary Wardens.
- Indicator 30: Downloads of walking and exploring resources from the Cotswolds National Landscape Board website.

Sustainable Tourism (Outcome 14)

Policy UE3– Sustainable Tourism

- Indicator 31: Number of businesses that are signed up to the Caring for the Cotswolds visitor giving scheme.
- Indicator 32: Income generated through the Caring for the Cotswolds visitor giving scheme.

APPENDIX 7. PRIORITY HABITATS AND SPECIES

This list of priority habitats and species for the Cotswolds National Landscape is adapted from Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, which lists the habitats and species that are of principal importance for the conservation of biodiversity in England. The habitats and species listed below are considered to be: (i) characteristic of the Cotswolds; and / or (ii) those for which the Cotswolds National Landscape is considered to be a stronghold of those particular habitats or species. There are other priority habitats and species within the National Landscape, which merit an appropriate level of protection, but which do not meet the two criteria outlined above. Habitats and species with an asterisk (*) are not on the NERC Act list but have been identified, by the National Landscape Board and relevant stakeholders, as priorities for the Cotswolds National Landscape.

HABITATS

Lowland mixed deciduous woodland
Lowland beech and yew woodland
Wood pasture, parkland, veteran trees and large areas of tree, scrub and grassland mosaic.
Lowland wildflower rich calcareous and neutral grasslands
Flushes, streams and rivers
Arable field margins important for birds and plant species
Hedgerows
Common box woodland
Areas important for bats ('batscapes') *
H7720 petrifying springs with tufa formation (Crataneurion)*

SPECIES

Farmland birds, such as skylark, lapwing and corn bunting
Pasqueflower
Pearl-bordered fritillary
Arable plants
Juniper
Cotswold pennycress
Bats
Dormouse
Water vole
Brown hare
Limestone grassland butterflies
Marsh fritillary
Violet click beetle
White clawed crayfish
Native brown trout
Bath asparagus*
Common box*
Rockrose pot beetle
Rugged oil beetle
Ancient woodland ground flora, such as helleborines and angular Solomon seal.
Ancient grassland flora such as musk and fly orchid.

APPENDIX 8. WHY BIODIVERSITY IS AN IMPORTANT CONSIDERATION IN THE COTSWOLDS NATIONAL LANDSCAPE

Introduction

This appendix sets out why biodiversity is an important consideration in the Cotswolds National Landscape (including why a higher biodiversity net gain requirement would be appropriate in the cotswolds national landscape, compared to neighbouring, non-designated areas).

Statutory purposes, duties and powers

The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB). The statutory purpose of AONB designation is to conserve and enhance the natural beauty of these areas.[113] Local authorities and other 'relevant authorities' have a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of AONBs.[114] Local authorities also have the statutory power to take action to accomplish this purpose.[115]

Link between natural beauty and biodiversity

Natural heritage (including biodiversity) is one of the factors that contributes to the natural beauty of AONBs.[116] As such, the conservation and enhancement of biodiversity is an important consideration when having regard to the purpose of AONB designation.

Paragraph 176 of the National Planning Policy Framework (NPPF) states that '*the conservation and enhancement of wildlife and cultural heritage are also important considerations in* [AONBs]'.[117]

Landscapes Review, Government response and '30 by 30'

The Government-commissioned Landscapes Review Final Report[118] proposes that:

- national landscapes[119] should form the backbone of Nature Recovery Networks - joining things up within and beyond their boundaries;[120]
- national landscapes should have a renewed mission to recover and enhance nature;[121]
- there should be stronger purposes in law for our national landscapes, including 'recover, conserve and enhance … biodiversity';
- strengthened [AONB] Management Plans should set clear priorities and actions for nature recovery.[122]

[113] Section 82 of the Countryside and Rights of Way (CROW) Act 2000 (link).
[114] Section 85 of the CROW Act 2000 (link). Further information on the 'duty of regard' is provided in Appendix 4 of the Cotswolds AONB Management Plan 2018-2023 (link) and in guidance published by Defra (link) and Natural England (link).
[115] Section 84 of the CROW Act 2000 (link).
[116] Natural England (2011) *Guidance for assessing landscapes for designations as National Park or AONB in England* (link). Table 3, page 13, and Appendix 1, page 25.
[117] Ministry of Housing, Communities and Local Government (2021) *National Planning Policy Framework* (link). Paragraph 176, page 50.
[118] Defra (2019) *Landscapes Review Final Report* (link).
[119] The phrase 'national landscapes' relates to AONBs and national parks.
[120] Proposal 4, page 52.
[121] Proposal 1, page 36.
[122] Proposal 3, page 43.

The Government's response[123] to the Landscapes Review Final Report states that:

- Working with … AONBs in the coming years, we will ensure our protected landscapes boost biodiversity.[124]
- Our vision for protected landscapes is a coherent national network of … nature-rich spaces … Protected landscapes will drive forward nature recovery.[125]
- The Prime Minister has committed to protect 30% of UK land for nature by 2030 (30 by 30)[126] … Achieving 30 by 30 will rely on improvements in how these areas are protected and managed for nature recovery.[127]
- We will put our protected landscapes at the heart of delivering our nature recovery … policies.[128]
- Given their spatial scale, and track records in planning and delivering landscape-scale restoration projects, protected landscapes could play a particularly important role in the delivery of the Nature Recovery Network.[129]
- We will explore ways for protected landscapes to support responsible authorities in preparing [Local Nature Recovery Strategies].[130]
- By strengthening the first purpose [of protected landscape designation] for nature … we will ensure these areas can contribute to this ambitious commitment for biodiversity and our wider nature recovery ambitions.[131]
- We will strengthen this purpose [to 'conserve and enhance'], making it clear that we need to actively recover nature in these areas, rather than simply conserve what remains.[132]
- A core function of protected landscapes should be to drive nature recovery.[133]

The British Ecological Society (BES)[134] and Wildlife and Countryside Link (WCL)[135] has both published reports on the Government's '30 by 30' aspiration. Both reports recognise the important role that protected landscapes should play in achieving this. However, they state that, until significant reform is delivered, protected landscapes should not automatically be included in the 30 by 30 target. Both reports make similar recommendations to the Landscape Review in this regard.

The executive summary of the BES report[136] sets out the following criteria that should be used to determine and inform what a site (or protected landscape) must achieve to be counted towards 30 by 30:

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[123] https://www.gov.uk/government/publications/landscapes-review-national-parks-and-aonbs-government-response/landscapes-review-national-parks-and-aonbs-government-response

[124] Landscapes review: government response (link). Foreword.

[125] Landscapes review: government response (link). Introduction.

[126] https://www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity. This press release implies that the 30% figure includes the entirety of AONBs: '*Existing National Parks, Areas of Outstanding Natural Beauty and other protected areas already comprise approximately 26% of land in England. An additional 4% … will be protected to support the recovery of nature'*. However, the Government's response to the Landscapes Review states that '*at present, under their current statutory purposes, level of protection and management, protected landscapes cannot be said to contribute towards 30 by 30 in their entirety*'.

[127] Landscapes review: government response (link). Since the publication of the review - nature and climate.

[128] Landscapes review: government response (link). Chapter 2: Nature and climate.

[129] Landscapes review: government response (link). The Nature Recovery Network and 30 by 30.

[130] Landscapes review: government response (link). The Nature Recovery Network and 30 by 30.

[131] Landscapes review: government response (link). The Nature Recovery Network and 30 by 30.

[132] Landscapes review: government response (link). A stronger mission for nature recovery.

[133] Landscapes review: government response (link). A stronger mission for nature recovery.

[134] British Ecological Society (2022) *Protected Landscapes and Nature Recovery*. (Link).

[135] Wildlife & Countryside Link (2021) *Achieving 30x30 in England on land and at sea*. (Link).

[136] British Ecological Society (2022). *Protected Landscapes and Nature Recovery – Executive Summary*. (Link).

1. Long term biodiversity protection against internal and external pressures.
2. Improves ecological resilience.
3. Effective management and monitoring.
4. Effective governance and engagement of local communities.

Colchester Declaration

The 'Colchester Declaration' is a formal commitment by the family of AONBs, under the umbrella of the National Association of AONBs (NAAONB), to redress declines in species and habitats within the context of a wider response to climate change.

The commitments include that, by 2030:

- At least 200,000ha of Sites of Special Scientific Interest (SSSIs) in AONBs will be in favourable condition.
- At least 100,000ha of wildlife-rich habitat outside of protected sites will have been created / restored in AONBs.
- At least 36,000ha of new woodland will have been planted or allowed to regenerate in AONBs following the principle of the right tree in the right place.

Considerations specific to the Cotswolds National Landscape

Two of the 'special qualities' of the Cotswolds National Landscape (CNL)[137] are the:

- Flower-rich grasslands particularly limestone grasslands;
- Ancient broadleaved woodland particularly along the crest of the escarpment.

The special qualities of the CNL are those aspects of the area's natural beauty which make the area distinctive and which are valuable, especially at a national scale. They are the key attributes on which the priorities for the area's conservation, enhancement and management should be based.

In the 1930s, 40% of the CNL was covered in wildflower-rich grasslands. Sadly, agricultural intensification and changing land management practices have led to the loss of almost all of this wildflower grassland … less than 1.5% remains.[138]

In 2019, the CNL Board published the Cotswolds Nature Recovery Plan (CNRP)[139] which identifies that in order to form a robust nature recovery network, the extent of wildlife rich habitats within the CNL needs to expand from 48,000ha (23% of the CNL area) to 82,000ha[140] (40% of the CNL area), with the target being to achieve this by 2050. This is consistent with the current scientific evidence[141]
The highest priority habitats in the CNRP are:

- veteran trees;
- ancient woodland;

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[137] Chapter 2 of the Cotswolds AONB Management Plan 2018-2023 provides a full list of the area's special qualities.
[138] https://www.cotswoldsaonb.org.uk/looking-after/our-grasslands-projects/glorious-cotswolds-grasslands/#:~:text=Sadly%2C%20agricultural%20intensification%20and%20changing,be%20managed%20to%20be%20maintained.
[139] Cotswolds Conservation Board (2021) *Cotswolds Nature Recovery Plan* (link).
[140] The figure rises to over 103,000ha if arable fields containing environmental measures are included.
[141] Defining and delivering resilient ecological networks: Nature Conservation in England.
Isaac. N.J. et al 2017. Journal of Applied Ecology

- ancient, unimproved, limestone grassland.

The CNRP states that achieving this target will require a farmer and land manager led approach to nature recovery, for example, through Environmental Land Management Schemes and Payment for Ecosystems. Biodiversity Net Gain mechanisms will also play an important role. It is also intended that the CNRP will feed into the forthcoming Local Nature Recovery Strategies.

APPENDIX 9. MAJOR DEVELOPMENT

Footnote 55 of the NPPF clarifies that:

- '*For the purposes of paragraphs 172* [relating to protected landscapes, including AONBs] *and 173* [relating to Heritage Coasts]*, whether a development is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined'*.

As such, it is not possible or appropriate to apply a blanket definition for what should be treated as major development in the Cotswolds National Landscape. Nevertheless, there are some key factors that help to define if a development is major, as outlined below.

The purpose for which the Cotswolds AONB has been designated is to conserve and enhance its natural beauty. Therefore, the judgement as to whether or not a development is major development depends, to a large degree, on whether or not the development could have a significant adverse impact on the natural beauty of the National Landscape. As outlined in Appendix 2, natural beauty incorporates a number of criteria, including landscape quality, scenic quality, tranquillity, natural heritage and cultural heritage. Within the context of the Cotswolds National Landscape, those aspects of the National Landscape's natural beauty which make the area distinctive and which are particularly valuable – the National Landscape's 'special qualities' - are listed in Chapter 2.

On this basis, a development should be considered 'major' if, by reason of its nature, scale and / or setting, it could have a significant adverse impact on any of the above criteria, including the National Landscape's 'special qualities'. As well as potential impacts within the National Landscape, consideration should also be given to impacts on these criteria within the setting of the National Landscape, particularly in the context of visual impact (i.e. views into and out of the National Landscape) and impacts on tranquillity.

As outlined in paragraph 172 of the NPPF, applications for such development should include an assessment of:

a. '*the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy*';

The Board would expect any such development proposal be accompanied by a statement of need in the context of national considerations and, ideally, in the context of needs arising from within the National Landscape. The impacts of permitting or refusing the development should be clearly identified, including the social, economic and environmental impacts, with specific reference to the impacts upon the natural beauty, special qualities of the National Landscape, and the economic and social needs (including housing needs) of the local communities affected. Such a statement should be based upon objective assessment and clear evidence.

b. '*the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way*';

The Board would encourage any such development proposal to be accompanied by a report setting out a sequential approach to site selection. This should evidence the extent to which alternative sites have been assessed before the selection of sites within the National Landscape, and clearly identify why sites outside of the designated area could not be developed. The report should also identify and

evidence why the need for the development could not be met in some other way. The report should include relevant evidence of the cost of developing outside of the National Landscape.

c. '*any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated*'.

The Board would expect any such development proposal to be accompanied by a report identifying any detrimental effects upon the environment, the landscape and recreational opportunities. Such a report should relate directly to the special qualities of the National Landscape as a whole as well as those specific to the development site.

Any mitigation identified to moderate these impacts should be:

- clearly detailed, in line with the duty to conserve and enhance the National Landscape,
- be compatible with the objectives of the National Landscape Management Plan, and
- be capable of realisation through robust planning conditions or obligation.

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COTSWOLD DISTRICT COUNCIL

Council name	**COTSWOLD DISTRICT COUNCIL**
Name and date of Committee	**CABINET – 12 SEPTEMBER 2023**
Subject	**REVIEW OF THE COTSWOLD DISTRICT LOCAL PLAN 2011-2031 HOUSING REQUIREMENT**
Wards affected	All Wards
Accountable member	Cllr Juliet Layton, Cabinet Member for Planning and Regulatory Services Email: juliet.layton@cotswold.gov.uk
Accountable officer	Charlie Jackson, Assistant Director for Planning and Sustainability Email: democratic@cotswold.gov.uk
Report author	Matthew Britton, Principal Planning Policy Officer Email: democratic@cotswold.gov.uk
Summary/Purpose	To recommend to Full Council to approve the Review of the Cotswold District Local Plan 2011-2031 Housing Requirement, which finds that the local housing need of the district has not changed significantly and that the minimum housing requirement provided by the Cotswold District Local Plan does not require updating.
Annexes	ANNEX A: Review of the Cotswold District Local Plan 2011-2031 Housing Requirement (CDC, August 2023) ANNEX B: Reviewing whether housing need has significantly changed (ORS, July 2023)
Recommendation(s)	*That Cabinet resolves to;* *1) Recommend to Full Council to approve the review of the Cotswold District Local Plan 2011-2031 housing requirement.*
Corporate priorities	Making the Local Plan Green to the Core
Key Decision	No
Exempt	No
Consultees/ Consultation	Cotswold District Council Legal Services Team

COTSWOLD DISTRICT COUNCIL

1. EXECUTIVE SUMMARY

1.1 The review of the adopted Local Plan housing requirement has been undertaken. This concludes that the local housing need of the district has not changed significantly and the adopted Local Plan housing requirement does not require updating. The situation may change, for example when national policy and guidance are updated, so will be kept under review.

2. BACKGROUND

2.1 Policy DS1 of the adopted Local Plan[1] sets a minimum housing requirement of 8,400 dwellings for the period 1 April 2011 to 31 March 2031 (the Local Plan period). In addition, there is a further requirement for 322 dwellings resulting from communal accommodation needs of Policy H4. Therefore, the combined requirement is 8,722 dwellings.

2.2 Since the adoption of the Local Plan in August 2018, national planning policies have been updated. Strategic policies, such as the housing requirement, now have to be reviewed at least once every five years to assess whether they need updating[2]. The Government has also introduced a nationally prescribed 'standard method' for calculating housing need[3].

2.3 A review of the housing requirement has been undertaken. This has considered whether the updated housing need over the Local Plan period, which is now calculated to be a minimum of 9,094 dwellings, has changed significantly. Taking consideration of a variety of relevant issues, the review also considers whether the adopted Local Plan housing requirement should be updated.

3. MAIN POINTS

3.1 The review concludes that:

- the local housing need of the district has not changed significantly; and
- the adopted Local Plan housing requirement does not require updating.

3.2 The review has considered whether the housing requirement should be increased to respond to various issues – an executive summary of these is provided within Annex A. Of particular note are that the extant requirement is able to fully deliver the updated housing need of 9,094 by delivering close to 10,000 dwellings over the 20 year plan period. The housing requirement is also working successfully in delivering the wider development strategy of the Local Plan.

3.3 The Local Plan is performing better than expected in terms of affordable (including social

[1] Cotswold District Local Plan 2011-2031 (adopted 3 August 2023)
[2] National Planning Policy Framework (July 2021) paragraph 33
[3] As set out in the Planning Practice Guidance for Housing and economic needs assessment (DLUHC, last updated 16 December 2020)

rented) housing delivery compared to when the Local Plan was examined in 2017/18. Housing affordability has got worse over the past few years but this is a multifaceted national issue, which increasing the housing requirement can do little to resolve. Additional sites can be allocated in the Local Plan Partial Update to provide additional affordable housing, if the Council wishes to, without increasing the adopted housing requirement.

3.4 The review provides a position at this point in time, which may change in future. For example, new housing need figures are published annually and new national planning policies and guidance are expected to be published in 2023, either of which may result in the housing requirement needing to be updated.

4. ALTERNATIVE OPTIONS

4.1 The alternative is to not accept the findings of the review. The result would likely be that from 3 August 2023, the requirement against which the five year housing land supply of the District is measured would switch from the Local Plan residual requirement to the government's standard method. This would result in the Council not being able to demonstrate a five year housing land supply and / or failing the Housing Delivery Test.

4.2 If the Council cannot demonstrate a deliverable five-year housing land supply, national policy specifies that the housing policies which are most important for determining planning applications will be considered to be out-of-date. Instead, planning applications will be determined with a presumption in favour of sustainable development. This may result in developments in unplanned locations, which would otherwise be unsuitable. The principle of plan-led development could be circumnavigated to address a shortfall in plan-led housing supply.

4.3 It would also have implications for the partial update process and it would require the council to identify additional land to meet shortfalls. This would require additional evidence gathering and informal community engagement to ensure the most sustainable locations for development were identified.

5. CONCLUSIONS

5.1 Cabinet should approve the Review of the Cotswold District Local Plan 2011-2031 Housing Requirement, which finds that the local housing need of the district has not changed significantly and that the minimum housing requirement provided by the Cotswold District Local Plan does not require updating.

6. FINANCIAL IMPLICATION

6.1 There are no direct financial implications, although approving the Review of the Cotswold District Local Plan 2011-2031 Housing Requirement would enable the Council to continue

to maintain a substantial five year housing land supply. This would reduce the risk of the Council's five year housing land supply being challenged at appeal, and the associated resource and costs that would otherwise be required.

6.2 The Review of the housing requirement may itself also be challenged at a test case appeal or in the courts, which could have associated financial implications for the Council.

6.3 The Review will also provide clarity and certainty to the Council's Development Management team. This will save officer time and resources when providing pre-application advice and determining planning applications. It will also enable the quicker determination of planning applications, which will be beneficial for applicants.

7. LEGAL IMPLICATIONS

7.1 The Council must undertake a Review of the Local Plan within five years of its adoption to establish if the policies remain up-to-date[4].

7.2 The Council accepted the conclusions of a review of the Local Plan in May 2020. This found that the Local Plan should be updated partially to address three broad factors:

i. address the climate and ecological emergencies; and

ii. update the policies to ensure they are consistent with the latest national planning policies and guidance, including addressing the increased housing need resulting from the then new standard method for calculating housing need (often referred to as the standard method) and

iii. Economic Conditions, in particular needing to reflect the changing nature of the high streets and the need to update policy S3 Cirencester Central Area Strategy.

7.3 This current review of the housing requirement updates the position on whether the Council needs to update the adopted housing requirement, as well as assessing whether the local housing need has changed significantly.

7.4 This has wider implications beyond the plan making process and the scope of the Local Plan Partial Update. It also affects how the Council determines its 'five year housing land supply', which is a national planning policy mechanism designed to ensure a continual supply of housing within the district.

7.5 This is an important consideration in the determination of planning applications. If the Council cannot demonstrate a five year housing land supply then in accordance with National Planning Policy Framework, (NPPF, 2021) clause 11(d), the 'presumption in favour of sustainable development', must be applied. This policy reduces the 'planning weight' the Council can apply to Local Plan policies involved in the provision of housing. For example, a Principal Settlement's development boundary (Local Plan Policy DS2) that

[4] NPPF footnote 20 states, "Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).

restricts development beyond the boundary would attract less weight in the 'planning balance'. The policy would only achieve full weight once the Council could demonstrate a five year housing land supply.

7.6 The effect of accepting this Review is to notify the local community and those seeking to gain planning permission for new housing development that the Local Plan housing requirement remains up-to-date. Therefore, the Council will not use the standard method as the basis for calculating its five year housing land supply from the 3 August 2023.

7.7 This approach utilises and is consistent with the NPPF (2021) paragraph 33 and 74 and footnote 39.

> Paragraph 33: *"Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary* [footnote 20]*. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.*
>
> Footnote 20: "*Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).*"
>
> Paragraph 74: *"…Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies* [footnote 38], *or against their local housing need where the strategic policies are more than five years old* [footnote 39]."
>
> Footnote 39: "*Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.*"

8. RISK ASSESSMENT

8.1 There is a risk that planning applicants and agents will not agree with the Council's position on the housing requirement when applying for permission for new housing development.

8.2 The Council may be challenged on its position on the housing requirement through an appeal to a refused planning application. Similarly, the Council may be challenged during the process of updating partially its Local Plan, particularly at the Local Plan examination.

9. EQUALITIES IMPACT

9.1 The adopted Local Plan was accompanied by a Sustainability Appraisal[5], which considered equalities impact. The Review of the housing requirement confirms that the adopted Local Plan housing requirement does not require updating, so the Sustainability Appraisal that supported the adopted Local Plan housing requirement remains fit for purpose.

9.2 An Integrated Impact Assessment was also produced for the Local Plan Partial Update (Regulation 18) Issues and Options consultation, which considered the issue of the housing requirement[6]. There is also a requirement to update the Integrated Impact Assessment at each stage of the production of the Local Plan Partial Update.

10. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

10.1 When the Local Plan was examined, it was found sound on the basis that housing delivery in the later part of the plan period would decrease in order to rebalance the extremely high rates of delivery earlier in the plan period and, in so doing, the Local Plan would deliver sustainable levels of growth. Indeed, the District had not delivered anywhere near the average annual rate of growth prior to 2011. The Local Plan inspector considered that, "As the OAN assumes a population increase sufficient to fill all of the additional jobs expected to be created in the district, increasing the housing requirement further would be likely to lead to net out commuting and therefore longer journeys by private motor vehicles… Whilst the market in the district may be sufficiently strong to mean that adopting such an approach would be effective in driving up supply, a balance has to be struck in order to achieve sustainable development having regard to the high quality of the built and natural environment and the need to avoid long distance commuting."

10.2 Around 5,580 homes were delivered in the first half of the Local Plan period – 66% of the entire Local Plan housing requirement – with the annual delivery rate peaking at 911 dwellings in 2017/18. This compares to the average annual housing requirement of 420 homes a year.

10.3 The development strategy has been effective and continues to work as planned. The average annual delivery rate between 2019 and 2023 is now 366 homes a year (including homes released to the market from communal accommodation developments). The development strategy is delivering a sustainable level of growth over the plan period.

10.4 If the housing requirement were to be increased, a situation would arise where the Council would likely to not have a five-year housing land supply and / or fail the Housing Delivery Test. In this situation, plan-led development can be circumnavigated by applications for housing development in otherwise unsuitable locations and where there is likely to be less

[5] https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-2011-to-2031/
[6] Interim Integrated Impact Assessment (2022)

opportunity to deliver benefits, particularly mitigating the impacts of climate change by locating housing in the most accessible locations. Applications would instead be determined in accordance with a 'presumption in favour of sustainable development', as set out in national policy.[7]

11. BACKGROUND PAPERS

11.1 None.

(END)

[7] NPPF (2021) paragraph 11

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COTSWOLD DISTRICT COUNCIL

Review of the Cotswold District Local Plan 2011-2031 Housing Requirement

August 2023

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1. Executive summary

1.1 Policy DS1 of the adopted Local Plan[1] sets a minimum housing requirement of 8,400 dwellings (C3 use class) for the period 1 April 2011 to 31 March 2031 (the Local Plan period). There is a separate requirement of 580 nursing and residential care bedspaces (C2 use class) over the 14-year period 2017-2031 (equivalent to an average of 41 bedspaces per year). Based on the Housing Delivery Test equivalence calculation[2], this represents an additional, but separate, requirement of 322 further dwellings. The combined requirement is 8,722 dwellings.

1.2 Since the adoption of the Local Plan, the National Planning Policy Framework (July 2021) (the NPPF (2021)) has set a new requirement for strategic policies, such as the housing requirement, to be reviewed at least once every five years to assess whether they need updating[3]. The Government has also introduced a nationally prescribed 'standard method' for calculating housing need[4].

1.3 A review of the housing requirement has been undertaken. This has considered whether the updated housing need over the Local Plan period, which is now calculated to be a minimum of 9,094 dwellings, is a significant increase. In so doing, the review has considered the following matters:

- Unmet housing need from neighbouring authorities;
- Affordable housing and housing affordability;
- Growth strategy for the area;
- Strategic infrastructure projects;
- Areas or assets of particular importance;
- Delivery of a sustainable pattern of development that mitigates climate change; and
- Whether the housing need has changed significantly.

1.4 **The review has concluded that the minimum housing requirement does not require updating**, primarily for the following reasons:

i. The updated housing need is 429 dwellings (4.95%) higher than the adopted Local Plan housing requirement, which is a relatively small percentage increase that is well within the bounds of flexibility.

ii. The adopted Local Plan policy specifies the requirement is a minimum. The policy does not seek to limit development, which might otherwise prevent the minimum housing need from being fully delivered. This is demonstrated by the Local Plan already being on course to delivering nearly 10,000 dwellings over the Local Plan period.

iii. The Local Plan Partial Update will continue to specify that the housing requirement is a minimum.

[1] Cotswold District Local Plan 2011-2031 (adopted 3 August 2023)
[2] Para. 11 of the Housing Delivery Test Measurement Rule Book (MHCLG, July 2018) explains, "*The ratio applied to other communal accommodation will be based on the national average number of adults in all households, with a ratio of 1.8*". Therefore, 580 bedspaces / 1.8 = 322 dwellings
[3] National Planning Policy Framework (July 2021) paragraph 33
[4] As set out in the Planning Practice Guidance for Housing and economic needs assessment (DLUHC, last updated 16 December 2020)

iv. The Council has not been requested to accommodate any unmet housing need from neighbouring authorities.

v. The growth strategy of the area continues to align with the planned housing growth. There is therefore no justification for the housing requirement to be any higher than the identified housing need on this basis.

vi. Housing is less affordable in Cotswold District compared to the county, regional and national averages. The Council is keen to take action to enable people to afford a home in the district. In this regard:

- The housing need, as calculated by the standard methodology, already includes a 188 dwelling per annum (62%) uplift to the household projections to help address the affordability of housing within district.
- Based on a supply of existing planning permissions, site allocations and windfalls, it is estimated that 1,051 affordable homes will be delivered between 2021 and 2031 (76% of the identified need for 1,378 affordable homes in this period).
- The Local Plan Partial Update includes various proposals, which would deliver additional affordable homes. This includes considering the allocation of additional sites to provide further affordable homes and various updates to affordable housing policies.
- The Council's Housing Strategy will further boost the delivery of affordable housing, whilst also addressing the holistic causes of housing affordability in Cotswold District.

vii. At the time of the examination of the adopted Local Plan, the Local Plan Inspector considered it to be reasonable for the Local Plan to deliver 64% of the identified affordable housing need. On that basis, the Inspector concluded that the affordable housing policies were sound. The affordable housing supply between 2021 and 2031 is already expected to deliver 76% of the affordable housing need (12 percentage points higher than the estimated amount of affordable housing delivery at the examination of the adopted Local Plan). Added to this, the proposed updates to the Local Plan housing policies and the Council's Housing Strategy will close the gap further – or possibly fully deliver – the affordable housing need.

viii. Based on the evidence for the district over the last 20 years, higher levels of both market and affordable housing delivery are likely to have had very limited impact on housing affordability in the district. Housing affordability is a multifaceted national issue. The solution(s) are largely beyond the control of the Local Plan and increasing the housing requirement will make virtually no difference. There is therefore no justification to increase the housing requirement in order to improve housing affordability or increase the supply of affordable housing.

ix. The District has two strategic infrastructure projects, which are the A417 Missing Link and the upscaling of activities at RAF Fairford. The housing needs of both have been considered but neither justify an increased housing requirement.

x. Given the district's land constraints (e.g. 80% of the district is an Area of Outstanding Natural Beauty), there could be argument for a lower housing requirement. Notwithstanding this, the District's constraints are strong justification why the adopted housing requirement should not be increased.

xi. When the adopted Local Plan was examined, the development strategy was found sound on the basis that housing delivery in the later part of the plan period would decrease in order to rebalance the extremely high rates of delivery earlier in the plan period. In so doing, the Local Plan would deliver sustainable levels of growth. Indeed, the District had not delivered anywhere near the average annual rates of growth in the first half of Plan period prior to 2011. Notwithstanding this, the annual delivery rates of housing have been, and are still expected to be, delivered as envisaged at the time the Local Plan was examined.

xii. Increasing the requirement would no doubt increase housing delivery. However, as the Inspector of the adopted Local Plan concluded in his report on the examination, "*Whilst the market in the district may be sufficiently strong to mean that adopting such an approach would be effective in driving up supply, a balance has to be struck in order to achieve sustainable development having regard to the high quality of the built and natural environment and the need to avoid long distance commuting*."

xiii. Increasing the housing requirement will result in increased household growth rates, which creates an increased housing need. This self-perpetuating cycle can only be broken by failure to deliver the housing requirement. However, if the housing requirement is not delivered in full, a situation arises where the Council is likely to not have a five-year housing land supply or fail the Housing Delivery Test. In this situation, plan-led development can be circumnavigated by applications for housing development in otherwise unsuitable locations and where there is likely to be less opportunity to deliver benefits, particularly mitigating the impacts of climate change by locating housing in the most accessible locations. Applications are instead determined in accordance with the NPPF's 'presumption in favour of sustainable development'. Increasing the housing requirement may therefore lead to an unsustainable pattern of development and prevent the Council from mitigating the impacts of climate change, which does not accord with NPPF (2021) paragraph 11.

xiv. The adopted Local Plan policy is set to deliver 9,671 dwellings over the Local Plan period. In addition, it is expected that 233 further homes will be released to the market resulting from the net increase in bedrooms in communal accommodation developments over the plan period – these count towards delivering the updated housing need of 9,094. In total, the 9,904 dwelling housing land supply over the Local Plan period will deliver 9% more than the minimum housing need. In other words, the identified housing land supply is capable of fully delivering the updated housing need.

xv. The Council's Housing Land Supply Report has assessed the deliverability of sites in detail. This evidence demonstrates that the Council has a deliverable and developable housing land supply, which is capable of fully delivering both the Local Plan's 8,400 dwelling minimum housing requirement and the updated minimum housing need of 9,094 dwellings over the Local Plan period.

xvi. The Council's approach towards determining applications for windfalls (i.e. sites not allocated for development in the Local Plan) has been positive and consistent with national policy. This is demonstrated by the very small number of planning appeals that have been lodged in this regard. Furthermore, the average annual number of windfall completions since 2011 (the beginning of the plan period) has increased from 95 to 138 a year. This demonstrates the Council's continued commitment towards treating the housing requirement as a minimum, not a maximum.

xvii. The Council will consider whether any additional sites should be allocated for housing to provide further contingency and increase the certainty that the updated housing need will be met in full.

xviii. An assessment has been undertaken of whether the applicable housing need has changed significantly. This concludes that the need has not changed significantly.

2. Introduction

2.1 The Cotswold District Local Plan (2011-2031) (the Local Plan) was adopted in August 2018 and has subsequently been kept under review[5].

2.2 A partial update of the Local Plan is being prepared to:

- make the Local Plan green to the core (i.e. respond to the Council's Climate and Ecological emergencies) – a commitment of the Council's corporate strategy;
- update or add policies to reflect changes to national policy and guidance and to improve the overall clarity and interpretation of the plan; and
- where necessary, allocate additional land for housing to ensure a five-year supply can be maintained over the remaining years of the adopted plan period to 2031.

2.3 This report updates the review of the adopted Local Plan housing requirement to determine whether the requirement should be updated in the Local Plan Partial Update. An assessment is made of various matters that contribute towards the calculation of the housing requirement, which may have changed since the Local Plan was adopted in 2018. The review also assesses whether the applicable local housing need has changed significantly.

2.4 The aim is to review the existing requirement and consider if it needs to be updated, not to establish a new requirement for the remainder of the plan period.

3. Housing need vs housing requirement

What is the difference between housing need and housing requirement?

3.1 Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for.

3.2 The housing requirement takes consideration of other planning matters, such as whether more homes should be provided to deliver additional affordable housing, economic growth strategies, strategic infrastructure improvements, or so that an authority can take on unmet need from a neighbouring authority. Such circumstances could necessitate a housing requirement that is higher than the housing need. The converse also applies. For example, protected areas or assets of particular importance may provide a strong reason for restricting the overall scale, type or distribution of development in the plan area. There may also be insufficient deliverable/developable land to meet the housing need of the plan area, in which case the authority would, if possible, seek to deliver the unmet housing need in a neighbouring authority. In simple terms, the housing requirement is the minimum housing target that the district is required to deliver over a period of time. This is for the period between 2011 and 2031 for the Cotswold District Local Plan.

What is the current housing requirement of Cotswold District?

3.3 The adopted Local Plan strategic policies identify a minimum requirement of 8,400 dwellings (C3 use class) over the 20-year period 2011-2031 (equivalent to an average of 420 per year).

[5] A review of the adopted Cotswold District Local Plan (2011 to 2031) (Cotswold District Council, 3 June 2020)

3.4 There is a separate requirement of 580 nursing and residential care bedspaces (C2 use class) over the 14-year period 2017-2031 (equivalent to an average of 41 bedspaces per year). Based on the Housing Delivery Test equivalence calculation[6], this represents an additional, but separate, requirement of 322 further dwellings.

3.5 These requirements were endorsed by Inspector that examined the Local Plan on the basis that they would meet the identified C2 and C3 use class housing need in full.

3.6 The two policies represent a combined minimum requirement of 8,722 dwellings over the 20 year Local Plan period (an average of 436 dwellings per annum). However, the requirement of 580 nursing and residential care bedspaces (C2 use class) was for the period 2017 to 2031 and did not cover the first six years of the plan period. The average annual requirement from 2017 is therefore 443 dwellings per annum.

3.7 The District is also required to maintain a five-year housing land supply[7]. This is currently measured against a related, but separate requirement, known in the Local Plan as the 'residual requirement'[8]. This is based on the C3 requirement and does not include the C2 requirement.

3.8 The purpose of the residual requirement – and the five-year housing land supply – is to ensure that the Local Plan's overall housing requirement is fully delivered and to support the Government's objective of significantly boosting the supply of homes by providing a sufficient amount and variety of land where it is needed so that the needs of groups with specific housing requirements are addressed.

3.9 The adopted Local Plan does not include a requirement for the number of dwellings that must be delivered in any given year. The average figures, in themselves, are not an annual requirement. The total Local Plan housing requirement can be delivered in any number of ways, so long as a five year supply is maintained, the Housing Delivery Test is passed and the requirement is delivered in full over the plan period.

3.10 The basis for the five-year housing land supply calculation is different for plans that have been adopted for more than five years, unless the housing requirement set out in strategic policies has been reviewed and updated where necessary. As the current Local Plan was adopted in August 2018, the calculation for Cotswold District would change in August 2023 unless the housing requirement has been reviewed and updated where necessary. Without the review, the five-year housing land supply would be measured against local housing need calculated by the government's standard method calculation.

Why does the Local Plan housing requirement have to be reviewed?

3.11 Since the adoption of the Local Plan in August 2018 when the housing requirement of the District was set, the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) have been updated. In particular:

- The new nationally prescribed 'standard method' for calculating housing need has been introduced.

[6] Para. 11 of the Housing Delivery Test Measurement Rule Book (MHCLG, July 2018) explains, "*The ratio applied to other communal accommodation will be based on the national average number of adults in all households, with a ratio of 1.8*". Therefore, 580 bedspaces / 1.8 = 322 dwellings

[7] NPPF (2021) paragraph 74

[8] The residual requirement is set out in Local Plan Policy DS1. It deducts dwelling completions since 2011 from the 8,400 dwelling Local Plan housing requirement. The residual requirement is then divided by the remaining years of the plan period to give an annualised requirement, which is used to measure the five-year housing land supply against.

- A new national policy has been introduced, which requires strategic policies (such as the housing requirement) to be reviewed at least once every five years to assess whether they need updating[9]. The Council's review of its Local Plan policies[10] found that it was necessary to consider the implications of the housing need figure resulting from the standard methodology to establish whether any strategic policies needed updating.
- A national policy has been introduced, which requires the five-year housing land supply to be measured against the local housing need figure, as calculated by the Standard Method, where the Local Plan housing requirement is more than five years old and has been reviewed and found to require updating[11].

3.12 Unless the Council's housing requirement is reviewed, and updated where necessary, and / or consideration is given to allocating additional housing sites to deliver the updated housing requirement, the Council may be unable to demonstrate a deliverable five-year housing land supply.

3.13 If the Council cannot demonstrate a deliverable five-year housing land supply, national policy specifies that the housing policies which are most important for determining the application will be considered to be out-of-date. Instead, planning applications will be determined in accordance with the presumption in favour of sustainable development prescribed by NPPF (2021) paragraph 11. This may result in developments in unplanned locations, which would otherwise be unsuitable. The principle of plan-led development could be circumnavigated to address a shortfall in plan-led housing supply.

When would the updated Local Plan housing requirement apply from?

3.14 National policy does not specify when updated Local Plan housing requirements should apply from. However, it specifies that, "*Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.*"[12]

3.15 National Policy also specifies that, "*Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old[13]*".[14]

3.16 The Local Plan was adopted on 3 August 2018 and the Plan becomes five years old on 3 August 2023. For ease of monitoring the Local Plan housing completions against whole months, the period that the updated housing need applies from is 1 August 2023 to 31 March 2031. This is a period of 7 years and 8 months.

[9] National Planning Policy Framework (2021) paragraph 33
[10] A Review of the adopted Cotswold District Council Local Plan (2011 to 2031)
[11] NPPF (2021) paragraph 74
[12] NPPF (2021) paragraph 33
[13] NPPF (2021) Footnote 9: "*Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.*"
[14] NPPF (2021) paragraph 74

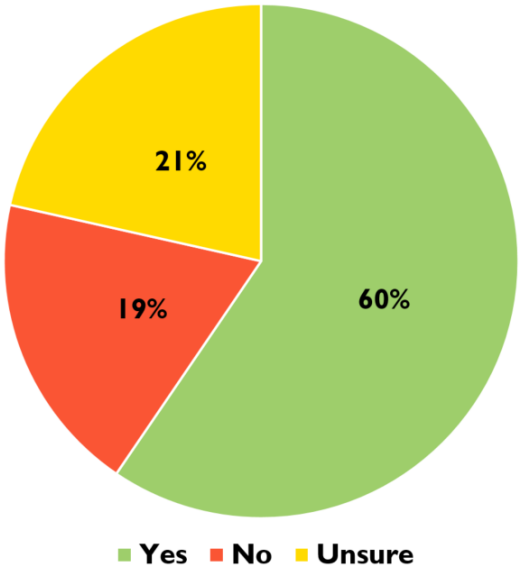
4. Local Plan 'Issues & Options' (Regulation 18) consultation

4.1 The Council undertook a Local Plan Issues and Options (Regulation 18) consultation between February and March 2022[15]. With regard to 'Housing Need, Requirement, Land Supply and Delivery' the Council presented the following two options:

i. *Revert to standard method housing need calculation as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured. Allocate additional sites in the Local Plan to maintain a five-year housing land supply and pass the Housing Delivery Test.*

ii. *Review and update the Local Plan housing requirement for the remainder of the Local Plan period. If required, allocate additional sites to maintain a five-year housing land supply and pass the Housing Delivery Test.*

4.2 The Issues and Options consultation document presented further information about each of the two options, and stated that the Council's preferred option was to review and update the Local Plan housing requirement for the remainder of the Local Plan period and, if required, to allocate additional sites to maintain a five-year housing land supply and pass the Housing Delivery Test. The consultation then asked whether people agreed that this was the most appropriate option and for them to explain why.



4.3 A significant majority of people agreed that the Council's preferred option was the most appropriate option, with more than three times as many respondents saying 'Yes' than 'No'.

4.4 The main reasons given in support was that this option would be better able to deliver plan-led development. There was also support for providing a flexible and balanced housing land supply and retaining the residual requirement methodology for calculating the requirement against which the five-year housing land supply is measured.

5. Reviewing the housing requirement

5.1 This section of the report considers the various matters that should be factored into the balance when reviewing the housing requirement for the Local Plan Partial Update.

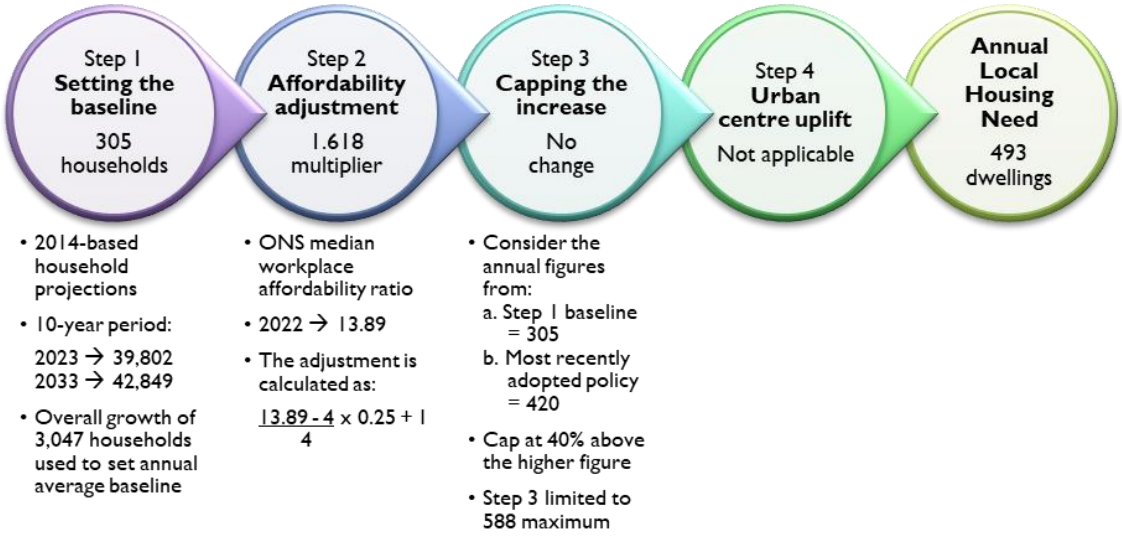
5.2 These matters include the currently adopted housing requirement, the residual requirement (taking account of those dwellings that have already been delivered), the current local housing need for the District based on the government's standard methodology calculation, any other factors that would justify increasing the housing requirement, as well as any constraints that should also be considered.

[15] Cotswold District Local Plan 2011–2031 Partial Update Issues And Options Consultation

What is the current housing need for Cotswold District?

5.3 Changes to the National Planning Policy Framework (NPPF) in 2018 introduced a new standard methodology for calculating housing need (the standard method).

5.4 Using the standard method calculation, the Gloucestershire Local Housing Needs Assessment[16] (September 2020) established that the local housing need was 490 dwellings per year for Cotswold District. However, the housing need figure can change as and when new data is published which feeds into the calculation. Based on the latest data available in August 2023, the standard method calculation identifies that the local housing need is **493 dwellings per year**[17].



5.5 The inputs to the local housing need calculation are expected to change next in March 2024 when new data is published. The methodology for calculating the housing need is also subject to periodic changes, as demonstrated by the government's consultation on its proposed changes to the planning system[18].

5.6 In reviewing the housing requirement for the period 2011 to 2031, it is appropriate to maintain the housing requirement endorsed by the Local Plan Inspector (an average of 420 dwellings per year) for the period up until five years after the Local Plan was adopted. This equates to 5,180 dwellings over the first 12 years and 4 months of the Plan.

5.7 However, as previously noted, this figure did not allow for the increase of residents living in communal establishments as the supply of Use Class C2 (residential institutions) was monitored separately. The standard method simplified the calculation of local housing need, and the net increase in bedrooms in both student and other communal accommodation is now counted using ratios based on Census data as set out in the Housing Delivery Test measurement rule book[19]. Therefore, for consistency, it is necessary to consider the impact of this additional need.

[16] Gloucestershire Local Housing Needs Assessment (ORS, September 2020)
[17] As calculated in April 2023 by the Planning Practice Guidance on Housing and economic needs assessment (DLUHC and MHCLG, updated 16 December 2020)
[18] Changes to the current planning system – Consultation on changes to planning policy and regulations (MHCLG, August 2020)
[19] Housing Delivery Test measurement rule book (DLUHC and MHCLG, July 2018)

5.8 Local Plan policy H4 identifies a need for 580 nursing and residential bedspaces between 2017 and 2031. This was based on a need calculation of the Strategic Housing for Older People Analysis Tool in 2017. However, this does not provide the full C2 housing need of Local Plan period.

5.9 The OAHN Report that was applied to the adopted 8,400 dwelling (C3 use class) minimum housing requirement also identified an increase of 366 residents living in communal establishments (C2 use class) over the 20-year Plan period[20]. Census data identifies an average of 1.807 adults per household as the relevant conversion ratio for Cotswold District. This equates to a total of 203 extra households, which yields a need for 217 additional dwellings based on the 6.55% rate that was assumed for dwellings without a usually resident household.

5.10 On this basis, the adjustment for communal accommodation yields an additional 11 dwellings per annum (dpa) that was additional to the housing need of 420dpa endorsed by the Local Plan Inspector – so the overall housing need (including communal accommodation) totals 5,314 dwellings over the first 12 years and 4 months of the Plan.

5.11 The remaining 7 years and 8 months would then be based on the local housing need identified by the government's standard method calculation at the time of the review (493 dwellings per year) equivalent to a further 3,780 dwellings. This yields an **overall need for 9,094 dwellings over the 20-year plan period**.

5.12 The Council's 2023 Housing Land Supply Report confirms that 6,407 dwellings will be delivered across the District up to 31 July 2023[21]. In addition, 147 dwellings have been released to the market resulting from the net increase in bedrooms in communal accommodation and the amount of accommodation released in the housing market. Therefore, at least 2,540 more dwellings would have to be delivered or released to the market over the remaining 7 years and 8 months to meet the 9,094 dwelling need in full.

How should the housing requirement be calculated?

5.13 National guidance[22] explains that, "*The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.*

[20] The Objectively Assessed Housing Needs of Cotswold District (NMSS, December 2016)
[21] This is based on 6,277 dwelling completions between 1 April 2011 and 31 March 2023 and one third (four months) of the projected 391 dwellings that are estimated will be completed in 2023/24.
[22] Planning Practice Guidance on Housing and economic needs assessment (DLUHC and MHCLG, updated 16 December 2020)

5.14 National policy also requires Local Plans to apply a "*presumption in favour of sustainable development*"[23].

"*a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

> *i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area[24]; or*
>
> *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*"

5.15 Therefore, the following matters form part of the review of whether the housing requirement requires updating:

- Unmet housing need from neighbouring authorities;
- Affordable housing and housing affordability;
- Growth strategy for the area;
- Strategic infrastructure projects;
- Areas or assets of particular importance;
- Delivery of a sustainable pattern of development that mitigates climate change; and
- Whether the applicable housing need has changed significantly.

Should the updated housing requirement be higher than the housing need to accommodate unmet housing needs from neighbouring authorities?

5.16 Cotswold District Council has not received any Duty to Cooperate requests to accommodate unmet housing needs from any neighbouring local authorities to accommodate market or affordable housing.

5.17 A Statement of Common Ground[25] (SoCG) has been signed between the Gloucestershire local planning authorities, which cover the entire Gloucestershire Housing Market Area. The SoCG makes the following commitments:

> *7. The Parties agree that making provision to meet the full range of housing needs in the right places at the right time is a vital role for the Gloucestershire authorities. The parties acknowledge this may result in one local authority accommodating the identified needs of another local authority, particularly where a local authority is*

[23] NPPF (2021) paragraph 11
[24] NPPF (2021) Footnote 7: "*The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change*"
[25] Gloucestershire Statement of Common Ground

unable to accommodate all of the identified need and where accommodating need in a neighbouring authority represents the most sustainable form of development.

8. The parties agree to jointly seek to meet in full (at least) the aggregated housing needs for Gloucestershire as identified by the statutory standard method at the time. The parties will continue the joint approach to the collection of housing needs data through a jointly procured and managed Local Housing Needs Assessment, using the relevant housing need methodology of the day. The parties agree to deliver housing where it promotes sustainable patterns of growth in Gloucestershire and is designed to respect local character and address potential impacts on existing communities.

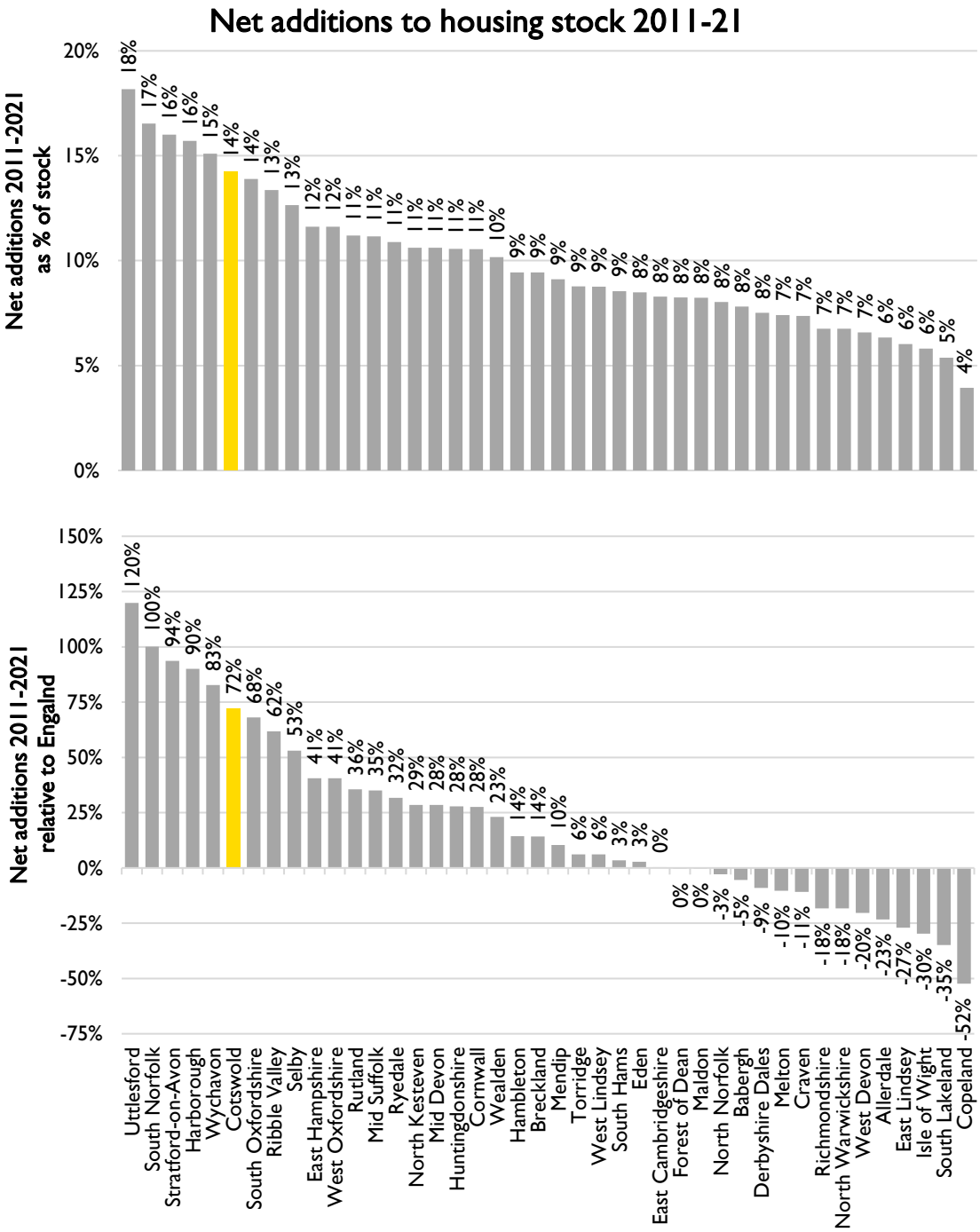
9. The parties agree to explore the full range of development opportunities available, taking into account the potential impact on existing communities, resources and infrastructure.

5.18 Therefore, there is currently no justification to set a higher or lower housing requirement to accommodate unmet housing need from neighbouring authorities.

Should the updated housing requirement be increased or decreased based on previous rates of housing delivery?

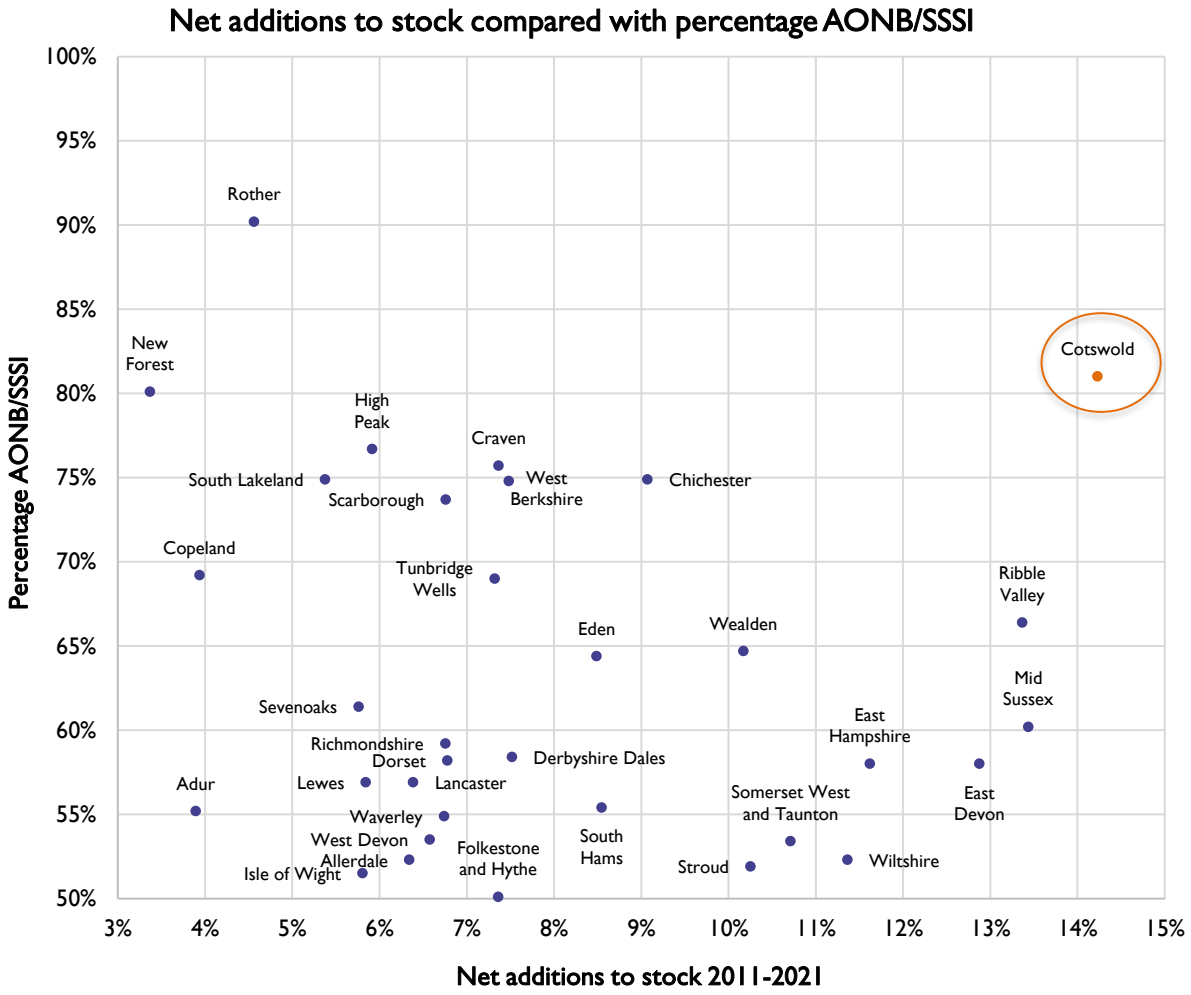
5.19 Over the first half of the Plan period (2011-2021) the dwelling stock in Cotswold District increased by 14%. That is equivalent to one new home being provided over the decade for every seven existing homes at the start of the decade. When this is considered in the context of other local areas, it is evident that the rate of housing supply in Cotswold District is amongst the highest of all other local authority areas that are classified as being predominantly rural by the Office for National Statistics (ONS).

5.20 The rate of supply in the majority of these rural areas was actually higher than the overall rate for England as a whole, with the rate in Cotswold District being 72% above the national average. It is evident that Cotswold District, together with many other rural areas, has achieved the Government's national policy objective to significantly boost housing supply and deliver new homes.



5.21 This step-change in supply has been achieved despite 80% of the land in the District being designated as an Area of Outstanding Natural Beauty (AONB) and 1.3% of the District being designated as a Site of Special Scientific Interest (SSSI), 1% of which being outside the AONB.

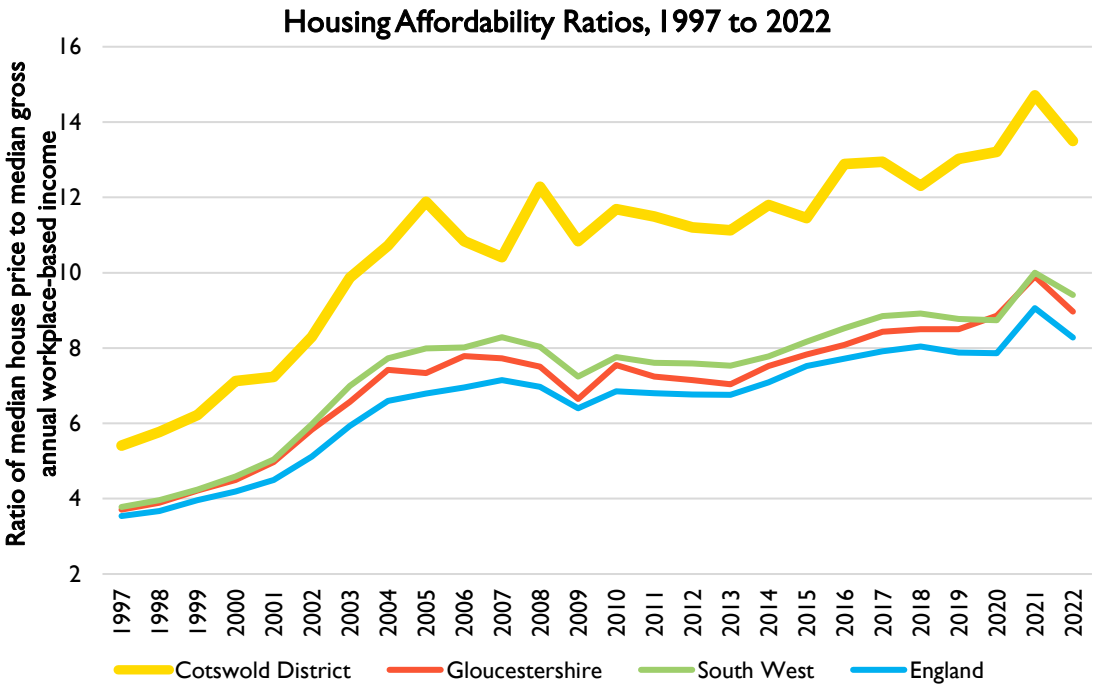
5.22 It is evident that no other district with similar levels of such constraints has achieved such a significant rate of new housing provision.



5.23 Given this context, it is clear that previous rates of housing delivery in Cotswold District have been amongst the highest of any other similar areas. There is therefore no justification for the updated housing requirement to be any higher than the identified housing need.

Should the updated housing requirement be increased or decreased based on housing affordability?

5.24 Housing affordability is a critical input to the Government's standard methodology for calculating housing need, and the District Council recognises that Cotswold District has an acute housing affordability issue, which has got increasingly worse over the past 25 years.



5.25 Many people, particularly younger people, are unable to afford a home close to where they work, grew up or have a close connection to. This has an impact on community cohesion, the local economy and the viability of some services. Furthermore, it can lead to an increase in commuting from areas where housing is less expensive, which runs counter to the goals of tackling climate change and improving health and wellbeing.

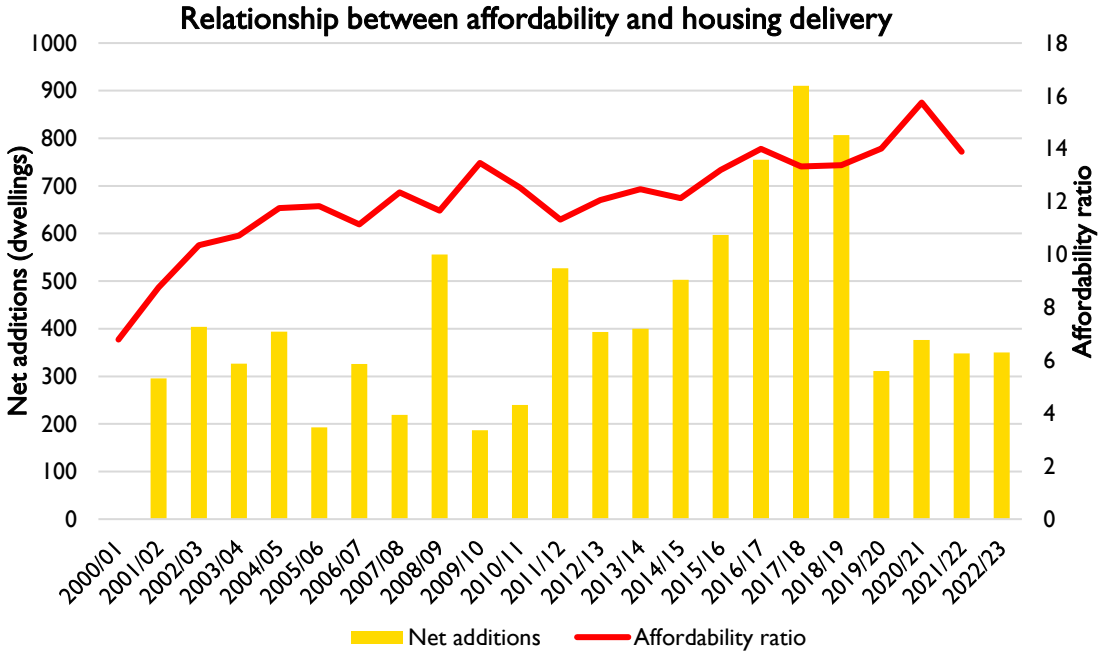
5.26 Whilst housing affordability is of significant concern to the District Council, many of the causes of housing unaffordability in Cotswold District are beyond the Council's control. For example:

- Wages have not kept pace with house price rises.
- Developers can 'drip-feed' new homes into the market to ensure house prices remain high to maximise profits.
- Land banking (i.e. land being used as a financial asset to increase share prices rather than to deliver housing).
- Right to Buy has left a shortage of social-rented housing nationally.
- Not enough social-rented housing has been built across the country. Subsidies have been cut. More recently, funds are being diverted towards dealing with fire safety issues and retrofit.
- Quantitative easing, coupled with low interest rates, increased the ability of people to get a mortgage, which fuelled an increase in house prices. There are increasing concerns about the UK's ability to finance loans secured in a low interest environment, with rates increasing rapidly during 2023 to address inflation.
- Stamp Duty holidays have fuelled increased demand for housing. With more money to spend on buying a home, house prices have risen.
- Second homes, holiday homes and buy to let have removed housing from the market that could otherwise be made available to those who want to own a single home, and the resulting increased demand within a reduced pool of housing stock inflates house prices and worsens affordability.

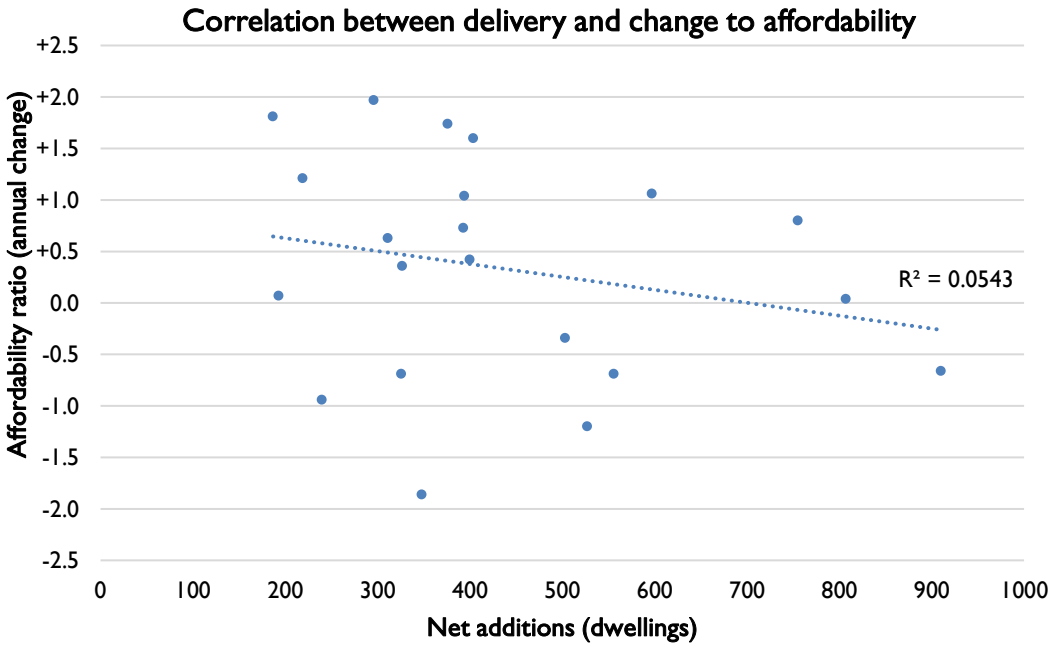
- The impact of inflationary pressures resulting from global events such as the Covid pandemic and more recently Russia's invasion of Ukraine.
- A labour shortage in the construction workforce.
- Increased costs of building materials and labour.
- When new market homes are built, they are typically more expensive than the average house available in the market. So, counterintuitively, new housing can increase the average house price in an area.

The relationship between affordability, housing need and housing delivery

5.27 The graph below compares the relationship between affordability and housing delivery in the district. Whilst housing supply has significantly increased since the start of the plan period in 2011, affordability has continued to deteriorate.



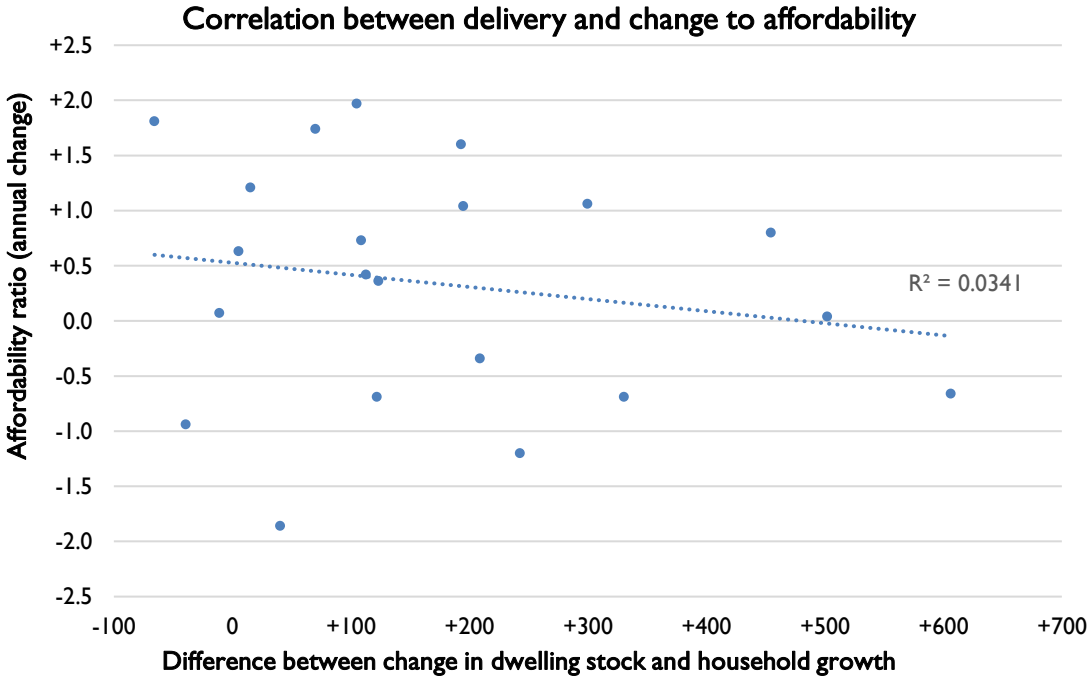
5.28 However, there is a very weak correlation between the housing delivery and annual change to affordability.



5.29 Through analysing the annual change in the affordability ratio and the net additions each year, we can establish the correlation coefficient r = -0.23 (with an r-squared value of 0.0543 and a downward trend). Any correlation coefficient that is closer to 0.0 than ±0.4 would be considered to be weak, so a correlation of -0.23 would be considered very weak.

5.30 However, it perhaps more appropriate to consider the annual change in affordability relative to the difference between the change in stock and household growth. In other words, it is only when the stock is increasing faster than the number of households that affordability would be expected to improve.

5.31 However, this results in an even weaker relationship, with a correlation coefficient of -0.18 (with an r-squared value of 0.0341 and a downward trend).



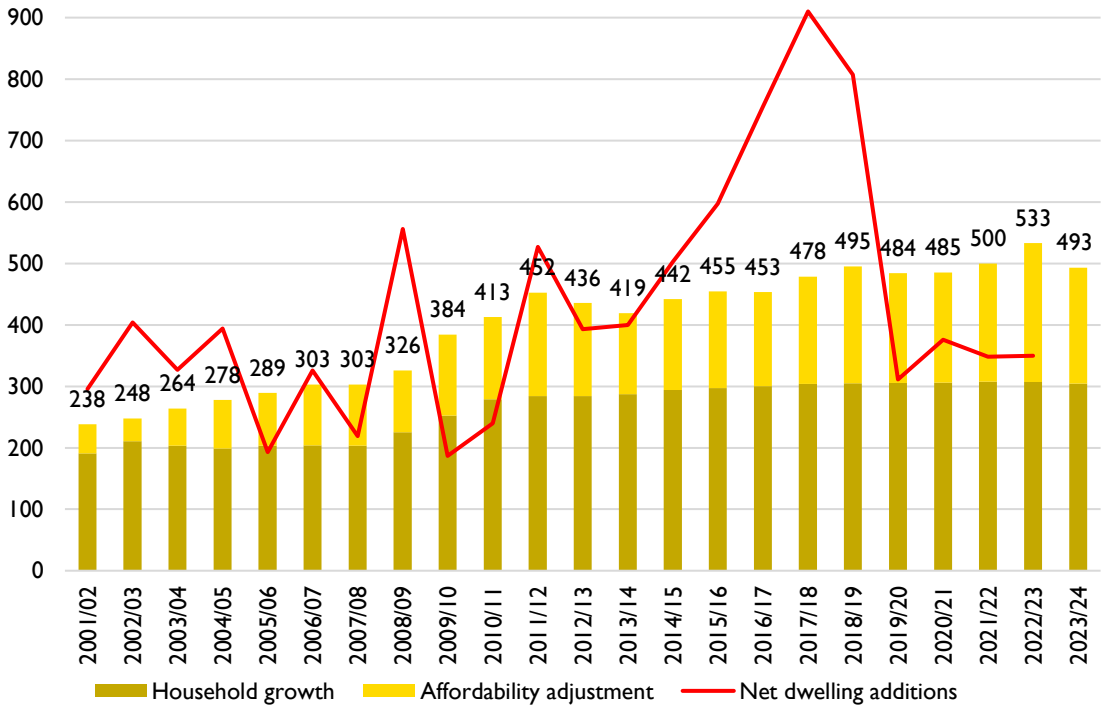
5.32 Therefore, based on the evidence for the district over the last 20 years, higher levels of housing delivery are likely to have very limited impact on local affordability.

5.33 For 2023-2024, step 1 of the standard method calculation identified a baseline need of 305dpa based on the projected household growth for Cotswold District; however, the adjustment factor at step 2 yielded an additional 188dpa based on a 61.8% uplift – so the affordability uplift represents 38% of the 493dpa housing need. This means that a large proportion of the housing need in Cotswold District and is already directed towards addressing the affordability of housing, principally due to the district's housing affordability ratio being so high.

5.34 Using the current standard methodology calculation, we can also establish the housing need of the district for previous years. The baseline is set using the national household growth projections for each year (using the 2014-based household projections in England) to project forward the average annual household growth over the following 10-year period. An adjustment factor is then applied to take account of affordability, based on the median workplace-based affordability ratios (published by the Office for National Statistics at a local authority level) for the relevant year.

5.35 The graph below compares the relationship between the housing need of the district and housing delivery.

Relationship between the housing need and housing delivery



5.36 Over the 10-year period 2001/02 to 2010/11 the standard method calculation identifies that the baseline housing need would have been 2,171 dwellings and the affordability uplift would have increased this by 874 to an overall housing need of 3,045 dwellings. During the same period, there was a total 3,140 net additions to the dwelling stock, so the housing need was met in full during that period.

5.37 Similarly, the overall housing need for the 5-year period 2011/12 to 2015/16 totalled 2,204 dwellings during which time there were 2,420 net additions to the dwelling stock. Therefore, housing supply exceeded housing need by 10%.

5.38 There were then several years of very high housing delivery between 2016 and 2018. Despite this, housing affordability has continued to get worse and, as a consequence, annual housing need has continued to increase despite the substantial delivery of new homes.

5.39 Housing needs are meant to be a minimum figure, not a maximum. Despite this, the analysis demonstrates that even with a large quantity of over delivery of housing, housing affordability in the district has continued to get worse.

5.40 Given this context, and based on the evidence, there appears to be little (if any) relationship between housing supply and affordability in Cotswold District. Housing affordability is a multi-faceted national issue. The provision of additional affordable housing resulting from the Local Plan will go some way towards helping the situation, but the Local Plan process has limited impact on the overall affordability of the housing in the district, which is shown to be a complex governmental policy issue.

5.41 It can therefore be concluded that the latest affordability ratios do not provide any justification for setting a higher (or lower) housing requirement. Nevertheless, the Council will continue to seek to maximise the amount of affordable housing that is delivered, both through the planning system and through other mechanisms, to help as many local households as possible.

Should the updated housing requirement be increased or decreased to deliver more affordable housing?

5.42 Over the 12-year period since the start of the Local Plan, a total of 2,024 affordable homes have been delivered, though the figure excludes losses of affordable homes from 52 sales under the Right to Buy[26] and affordable homes demolished in regeneration schemes. Therefore, net additions to the stock total 1,972 affordable homes, equivalent to an average of 164 homes per year.

5.43 However, the planning system is only one mechanism available for delivering affordable housing, and the supply is being proactively boosted by Cotswold District Council and the Council's partners. The Cotswold District Corporate Plan[27] aims to deliver more genuinely affordable housing and sets out a range of actions to do so.

[26] Right to Buy data covers the 11-year period 2011-2022 as figures are not yet available for 2022/23
[27] Cotswold District Council Corporate Plan 2020-2024 (Spring 2022 Update)

Our aims	Our actions	Commencement	Completion
Provide more affordable housing with the emphasis on social rented accommodation	Adopt an affordable housing delivery strategy that sets out clear aims and objectives	June 2020	November 2020
Provide additional housing to meet the needs of the district	Examine our existing assets and identify opportunities for housing delivery	September 2020	May 2021
	Identify opportunities to acquire properties for homeless accommodation	July 2020	Ongoing
	Identify and consider sites for delivery	July 2020	Ongoing
	Explore modern methods of construction in the context of our rural setting	April 2021	Ongoing
	Support young people through a 'rent to buy' scheme	April 2021	Ongoing
Deliver the Kemble housing development	Secure planning permission for the development	September 2020	March 2021
	Progress the development independently, or with a suitable partner	July 2021	June 2022
Reduce reliance on bed and breakfast and hotels for emergency homeless accommodation	Maximise the opportunities of the 'housing first' model	July 2020	Ongoing
	Acquire the property approved in July 2020, and put this to use	July 2020	December 2020
	Participate in a joint Gloucestershire bid for additional government funding	August 2020	December 2021
Deliver social rented and affordable rented accommodation across the district	Explore direct delivery options Work with partners to increase the supply of social rented accommodation Investigate the feasibility of setting up a housing company	September 2020	Ongoing

Affordable housing delivered through the planning system

5.44 The Cotswold Strategic Housing Market Assessment (SHMA) Affordable Housing Further Update (HDH, April 2016) and associated errata note (May 2017) identified the total need for affordable housing to be 157 dwellings per year from 2015 to 2031.

5.45 The examining Inspector of the adopted Local Plan concluded that this affordable housing need could not be met in full through the planning system. A balance had to be struck in order to achieve sustainable development with regard to delivering affordable housing and the need to protect the high quality built and natural environment and to avoid long distance commuting.

5.46 The bulk of affordable housing delivery comes from Local Plan Policy H2, which requires up to 30% affordable housing on qualifying brownfield sites and up to 40% affordable housing on qualifying greenfield sites. Several further policies add to the affordable housing supply[28]. At the time of the Local Plan examination, the Local Plan policies were expected to deliver approximately 100 affordable homes a year through the planning system, which represented 64% of the District's affordable housing need identified by the SHMA. On that basis, the Inspector concluded that the affordable housing policies were sound[29].

Affordable housing resulting from the updated Housing Strategy

5.47 The Council's Housing Strategy will further boost the delivery of affordable housing, whilst also addressing the holistic causes of housing affordability in Cotswold District. The Strategy considers housing affordability holistically by addressing the causes of people not being able to afford a home in the District and identifies eight further areas where action can be taken to increase the supply of affordable homes and to support household budgets.

5.48 The focus areas are:

- Neighbourhood development plans.
- Development management: planning permission.

[28] E.g. Local Plan Policies H3 and H4

[29] See paragraphs 55, 56 and 209 of the Report on the Examination of the Cotswold District Local Plan 2011-2031 (PINS, 5 June 2018, PINS Ref: PINS/F1610/429/2)

- Extending the rural area designation to cover most of the 20% of the district, which is not located within the Cotswolds Area of Outstanding Natural Beauty.
- Reducing household bills and delivering low carbon or zero carbon homes.
- Supporting young people.
- Providing a downsizing strategy to support older people to move into more suitable accommodation and to enable additional larger family homes to become available for families who need them.
- Tackling the impact of second homes, holiday homes and Airbnb have on the District's housing stock.
- Helping wages to keep pace with house prices.

Affordable housing resulting from the Council's partnership with Registered Providers

5.49 The Council is working in partnership with several Registered Providers to buy land for 100% affordable housing schemes; regenerate existing sites (often at higher densities); deliver affordable housing on Council-owned sites; use grant funding to convert market housing into affordable homes; and sell Council owned assets to raise funds to deliver more affordable homes.

5.50 For example:

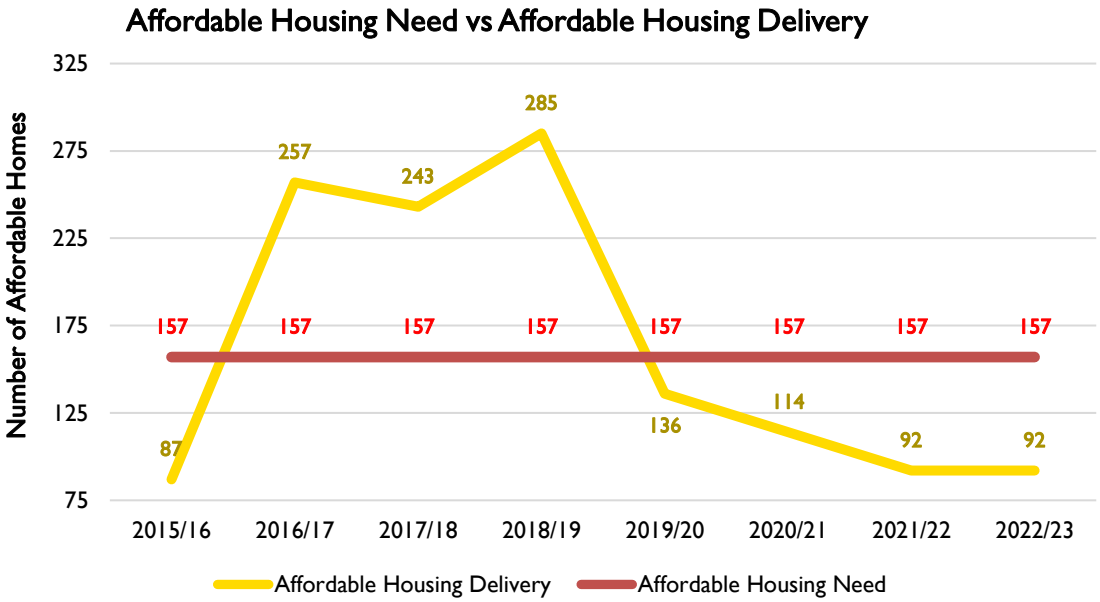
- Patterson Road, Cirencester (36 social rented homes - Bromford): In 2020, 36 new, energy efficient homes were completed to update and replace existing affordable housing that was no longer fit for purpose. These provide a mix of affordable rent and shared ownership homes, built to modern energy efficiency standards, for local residents.
- Churnbridge Row, North Cerney (12 affordable homes - Cirencester Housing): In 2020, 12 new affordable homes were completed in North Cerney. The Council granted funding for the completion of the development, which played a big part in ensuring that these will always be affordable homes for local people. The scheme comprises 10 houses and flats for affordable rent and two houses for shared ownership.
- Wickhams Field, Tetbury (30 social rented homes - Bromford): In April 2022, a 30-dwelling affordable housing development was completed at Wickhams Field, Tetbury. The site is now fully occupied with most residents having a connection to the town. The 30 homes are a mixture of two and three-bedroom houses and one-bedroom flats, all of which are for social rent.
- Chamberlayne Close, Stow-on-the-Wold (18 social rented homes - Bromford): In July 2022, 18 energy efficient homes for social rent were completed in Stow-on-the-Wold. The previous homes were identified under the Sheltered Housing Review as being no longer fit for purpose for elderly customers and they had a poor energy efficiency rating.
- Stockwells, Moreton-in-Marsh (28 social rented homes - Bromford): Stockwells cul-de-sac in Moreton is being redeveloped to provide 28 new net zero carbon social rented homes. The development will be the first affordable modular build of its kind in the Cotswolds. The existing homes at Stockwells were built in the 1950s and were not energy efficient. The scheme involves demolishing the 24 existing homes and replacing them with 28 modern, energy-efficient homes which are affordable for tenants to run. The new homes will be completely gas-free and all homes will be fitted with air source heating and solar panels to align with the Council's drive for all affordable housing to be green to the core.

- Leaholme Court, Cirencester (44 apartments - Bromford): 44 new apartments for social rent were completed at Leaholme Court in summer 2022, replacing 46 flats built in the early 1960's that were no longer fit for purpose.
- Cross Tree Crescent and Oakley Flats, Kempsford (27 1-3 bedroom houses and 2 bedroom bungalows - Bromford): A scheme is underway to demolish 14 sub-standard existing houses and 12 flats and to rebuild 27 new affordable 1, 2 and 3 bedroom houses and 2 bedroom bungalows. Oakley Flats are currently under construction and due for completion spring 2023. Cross Tree Crescent is to follow thereafter. These will be modern, energy efficient homes, which are affordable for people to live in and run.
- The Sunground, Avening (14 new social rented and shared ownership homes - Bromford): Work has commenced on the development of three 2-bedroom and six 1-bedroom social rented homes and four 2-bedroom and one 3-bedroom shared ownership homes. These will include various features that will make the homes more carbon efficient and cheaper to operate, such the homes having an air source heat pump for heating and hot water; electric vehicle charging points; solar panel; provision of water butts; secure cycle storage; and provision of broadband.
- Land at Davies Road, Moreton-in-Marsh (15 social rented homes - Cottsway): This development will provide 15 low-carbon homes for social rent, including a mix of one, two and three-bed properties. The scheme is due to be completed in 2024 and will include sustainable features such as air-source heat pumps and enhanced levels of insulation.
- Land adjacent to Broadleaze, Down Ampney (a social rented housing development - Bromford): Cotswold District Council own land adjacent to Broadleaze in Down Ampney, which is allocated in the Local Plan for housing development. The Council is currently working with Bromford Housing to bring forward a scheme for 15 social rented, energy efficient homes.
- Sale of The Cotswold Club in Cirencester[30]: In August 2022, the Council sold The Cotswold Club in Cirencester to invest in more net zero affordable housing. This is a further commitment from the Council to boost the delivery of affordable housing through the realisation of its assets.
- Use of grant funding to buy market homes: The Council has used grant funding to purchase 118 additional affordable homes on five sites since 2011. Further market homes will be purchased in future as and when opportunities arise.
- Berkeley Close, South Cerney: Bromford propose to replace 59 concrete constriction homes with around 84 modern, energy-efficient homes. A planning application will be submitted in summer 2023.

Affordable housing delivery since the Local Plan was adopted

5.51 Since the Local Plan was adopted, several additional years of monitoring data have become available. The graph below compares the annual affordable housing need identified by the SHMA (which was assessed from 2015 onwards) with affordable housing delivery.

[30] Cotswold News: Cotswold District Council sells The Cotswold Club to invest in more net zero affordable housing (22.08.2022)



5.52 In summary:

- Between 2015 and 2023, the District delivered 1,336 affordable homes (net) with 30 sales under the Right to Buy, resulting in an average increase of 163 affordable homes a year). This included 181 social rented homes (an average of 23 per year).
- Between 2023 and 2031, developments with planning permission and remaining Local Plan site allocations are expected to deliver 675 additional affordable homes (net) (an average of 84 per year). Based on historic delivery and future trends, it is conservatively estimated that around 192 further affordable homes will be delivered as windfalls between 2023 and 2031 (an average of 24 per year)[31]. Based on the current housing land supply, total affordable housing delivery between 2023 and 2031 is therefore expected to be 867 affordable homes delivered through the planning system (an average of 108 per year). The Council will also continue to maximise affordable housing delivered through other mechanisms.
- Total affordable housing delivery over the 20-year Local Plan period 2011 to 2031 is expected to be at least 2,839 homes (net) (142 affordable homes per year on average).

Why have more affordable homes been delivered than were estimated for the Local Plan?

5.53 Although the affordable housing delivery rate of just over 140 affordable homes a year over the Plan period is 30%+ higher than the figure of 100 affordable homes year that the Local Plan Inspector considered to be a reasonable target for the Plan, it is important to recognise that the overall number of homes delivered has exceeded the 420 per year average housing

[31] NPPF (2021) Annex 2 defines windfall sites as "*Sites not specifically identified in the development plan.*" An explanation of how the estimate of future windfall delivery in Cotswold District is calculated and the justification for using a windfall allowance in the housing trajectory is provided at pages 7 to 18 of the Housing Land Supply Report (CDC, July 2022). In addition to the guidelines provided in that report for assessing windfall delivery, the following additional guidelines have been used for determining whether affordable housing developments count as windfalls:

- Any additional affordable housing delivered on 100% affordable housing sites are counted as windfall affordable housing (the number of windfalls excludes the 30% or 40% requirement that would already have been delivered on those sites if the site is within or adjacent to the development boundaries of one of the 17 Principal Settlements identified in the Local Plan).

Market homes bought with grant funding and have been converted into affordable housing are counted as windfall affordable homes.

requirement. As affordable housing will be delivered as a proportion of overall housing delivery, the higher number of market homes already delivered has yielded a higher return of affordable homes. The reality is that the Local Plan does not set an upper limit market or affordable housing delivery.

5.54 Importantly, the delivery rate of over 140 affordable homes per year includes affordable housing delivered through all mechanisms (and not only the affordable housing delivered through the planning system) so it reflects the considerable wider efforts of the District Council and its partners. However, this still remains below the housing need of 157 affordable homes per year that was identified by the SHMA.

Updated affordable housing need: the Gloucestershire Local Housing Needs Assessment (ORS, September 2020)

5.55 The Gloucestershire Local Housing Needs Assessment (LHNA) (ORS, September 2020) reassessed the affordable housing need of Cotswold District. It identified an overall need for 2,497 affordable homes for the period 2021-2041. This included 248 households as the net current need in 2021 and a net newly arising need of 113 households per year on average over the 20-year period.

5.56 On this basis, for the LHNA period that falls within the current Local Plan period (i.e. 2021-2031) the overall need for affordable housing is around 1,378 households (i.e. (10 years x 113 of newly arising households) + 248 households with current need).

5.57 In terms of delivering this figure:

- 191 affordable homes were delivered from between April 2021 and March 2023, though there were seven dwellings sold under the Right to Buy in 2021/22 reducing the total to 184 net additions.
- 675 affordable homes are expected from sites with planning permission and remaining Local Plan site allocations between April 2023 and March 2031.
- 35 affordable homes Fairford Neighbourhood Development Plan site allocation.
- 192 affordable homes are expected to be delivered as windfalls between April 2023 and March 2031.

5.58 Based on affordable homes already delivered and the supply currently identified, it is estimated that 1,086 affordable homes will be delivered between 2021 and 2031. This represents nearly four fifths (79%) of the need of 1,378 households that was identified by the LHNA for this period, with a shortfall of 292 additional affordable homes needed in order to meet the need in full.

5.59 For development to be included in the Local Plan housing supply, it has to have a reasonable prospect of delivery in accordance with strict national policy tests. The effect in Cotswold District is often a conservative underestimate of what will actually be delivered – so it is likely that more affordable homes will be delivered in practice, as evidenced by the affordable housing delivery since the Local Plan was adopted (163 affordable homes a year) being so much higher than the figure that could be demonstrated during the Local Plan examination (100 affordable homes a year).

Affordable housing resulting from the Local Plan Partial Update

5.60 The Local Plan Partial Update includes various proposals that will further boost the delivery of affordable housing. For example:

- Policy H1 proposes to improve housing affordability by:
  - Increasing the requirement for smaller house types, which are generally more affordable.
  - Increasing the requirement for bungalows, which will enable older people to downsize and will free up larger accommodation for family housing.
- Policy H2 proposes to boost affordable housing delivery by:
  - Increasing the affordable housing requirement up from 40% on qualifying greenfield sites to potentially as high as 50% (as it was in the previous Local Plan).
  - Reducing the threshold for which affordable housing is required in designated rural areas to from 5 to 3 dwellings.
  - Reducing the threshold for which affordable housing is required in all other locations from 11 to 10 dwellings.
  - Requiring affordable housing on sites of 0.5 hectares or more, which is currently not requirement in the Local Plan.
  - Closing a loophole, which currently enables affordable housing contributions to be avoided where multiple small schemes gain planning permission, which on their own do not require trigger an affordable housing contribution but in combination would.
  - Requiring that affordable housing must delivered on site in all but exceptional circumstances, wherever in the district the development is located.
  - Requiring 25% of affordable homes to be First Homes with a 50% discount of the market price.
  - Providing policy support for entry level exception sites outside the Cotswolds Area of Outstanding Natural Beauty.
  - Clarifying the circumstances when viability is a reason to not provide affordable housing, particularly the price that is paid for land.

Conclusion on whether the Local Plan housing requirement should be increased or decreased to deliver more affordable housing

5.61 The provision of additional affordable housing resulting from the Local Plan can go some way towards helping the housing situation, and the Council is keen to ensure that is does all it can to enable people to afford a home in Cotswold District. In this regard:

- The housing need, as calculated by the standard methodology, already includes a 188dpa (62%) uplift to the household projections to help address the affordability of housing within district.
- Based on a supply of existing planning permissions, site allocations and windfalls, it is estimated that 1,051 affordable homes will be delivered between 2021 and 2031 (76% of the identified need for 1,378 affordable homes in this period).
- The Local Plan Partial Update includes various proposals, which would deliver additional affordable homes. This includes considering the allocation of additional sites to provide further contingency and increased certainty that the updated housing need will be met in full and various updates to affordable housing policies. As with the extant Local Plan,

the updated Local Plan policies will set a minimum housing requirement and will not prevent over-delivery.

- The Council's Housing Strategy will further boost the delivery of affordable housing, whilst also addressing the holistic causes of housing affordability in Cotswold District.

5.62 At the time of the examination of the adopted Local Plan, the Local Plan Inspector considered it to be reasonable for the Local Plan to deliver 64% of the identified affordable housing need. On that basis, the Inspector concluded that the affordable housing policies were sound.

5.63 The affordable housing supply between 2021 and 2031 is already expected to deliver 76% of the affordable housing need, which is 12 percentage points higher than the estimated amount of affordable housing delivery at the examination of the adopted Local Plan. Added to this, the proposed updates to the Local Plan housing policies and the Council's Housing Strategy will close the gap further – or possibly fully deliver – the affordable housing need.

5.64 Based on the evidence for the district over the last 20 years, higher levels of housing delivery are likely to have very limited impact on local affordability. Housing affordability is a multifaceted national issue, the solution(s) are largely beyond the control / influence of the Local Plan.

5.65 There is therefore no need to increase the housing requirement in order to further boost the delivery of affordable homes.

Should the updated housing requirement be increased or decreased to accommodate housing needs resulting from growth strategy of the area?

5.66 Whilst Cotswold District has several larger employers, thriving town centres and an economy that is recovering well from the Coronavirus pandemic, the growth strategy for the area is relatively small-scale compared to more urban areas with more strategic growth aspirations. This is illustrated by the adopted Local Plan, which requires 24ha of employment between 2011 and 2031.

5.67 The Council's Green Economic Growth Strategy[32] aims to deliver green economic growth by creating a dynamic, vibrant and balanced economy in the Cotswolds by growing high value, highly-skilled, low environmental impact commerce in the District. The Strategy identifies, in common with Gloucestershire's Draft Local Industrial Strategy[33], agritech, cyber/digital, green technologies and tourism as key growth sectors for the District. It also identifies the importance of housing growth in the District's economic recovery and that housing affordability is a significant issue for the District, which can cause businesses to face skill and labour shortages.

5.68 Nevertheless, paragraph 56 of the Inspector's report of the examination of the Local Plan, states that, "*As the OAN assumes a population increase sufficient to fill all of the additional jobs expected to be created in the district, increasing the housing requirement further would be likely to lead to net out commuting and therefore longer journeys by private motor vehicles.*"[34] The original housing requirement of 8,400 dwellings provided sufficient new homes to ensure a balance between jobs and workers over the 20-year Local Plan period, and there is a continued risk that any increase would still be likely to lead to increased out-commuting. The housing land supply over the 20 year Local Plan period is now expected to be nearly

[32] Cotswold District Green Economic Growth Strategy (adopted December 2020)
[33] Gloucestershire's Draft Local Industrial Strategy (Gfirst LEP, 2019)
[34] Report on the Examination of the Cotswold District Local Plan 2011-2031 (PINS, 5 June 2018. ref: PINS/F1610/429/2)

10,000 net additional homes. Any further increase to the housing requirement would likely deliver further housing could lead to an imbalance between jobs and workers and an increase risk of out-commuting.

5.69 The Gloucestershire Local Housing Needs Assessment[35] has assessed the alignment between future jobs and workers over the 20-year period 2021-2041. At the time of the study, the minimum local housing need (LHN) figure was 490 dpa and delivering that number of homes annually would have led to an increase of 4,291 economically active residents, of which 3,700 would have been likely to work in the local area. That increase was considerably higher than the jobs growth identified by the Oxford Economics baseline forecast, though aligned with the medium-high scenario. Whilst more workers would have been needed to align with the Cambridge Econometrics forecast, paragraph 5.19 of the LHNA noted that the surplus of workers elsewhere in the Gloucestershire Housing Market Area could ensure alignment with only small changes to net commuting patterns.

5.70 Nevertheless, there is clearly significant uncertainty about the extent of future economic growth, as illustrated by the different forecasts. There is also uncertainty about the long-term impact of recent changes to the employment market (especially with regard to the number of employees working from home) which may also have impacted commuting patterns since the 2011 Census. Given this context, whilst the Council recognises the need for broad alignment between housing and employment growth, it is cautious about placing undue weight on any one set of figures given these inherent uncertainties. It is also clear that the caution raised by the Local Plan Inspector about increases to net out-commuting and therefore longer journeys by private motor vehicle remains relevant.

5.71 Given this context, it seems likely that the growth strategy of the area continues to align with the planned housing, so there is therefore no justification for the housing requirement to be any higher than the identified housing need on this basis.

Should the updated housing requirement be increased or decreased to accommodate housing needs resulting from strategic infrastructure projects?

5.72 There are two relevant strategic infrastructure projects in Cotswold District. These have been assessed to establish whether the housing requirement should be increased to accommodate additional housing growth resulting from these projects.

Upscaling of activities at RAF Fairford

5.73 An upscaling of activities is planned at RAF Fairford, which will increase the number of United States Air Force personnel who are stationed in this location. The housing requirements for this project have been assessed[36] and the implications of the project on housing needs have been taken into consideration in the Gloucestershire Local Housing Needs Assessment[37]. The project was not considered to have any implications that required an uplift the 490 dwelling local housing need. An update from RAF Fairford in 2023 confirmed the situation remains unchanged.

A417 Missing Link

5.74 The Missing Link project aims to reduce delays and increase safety on a three-mile stretch of single-lane carriageway on the A417 between the Brockworth bypass and Cowley roundabout, which is on the north-western edge of Cotswold District. The project will free up an important

[35] Gloucestershire Local Housing Needs Assessment (ORS, September 2020)
[36] RAF Fairford Housing Requirements and Market Analysis 2018-2023 (RDN Inc. on behalf of the USAF)
[37] See paragraphs 9.31 to 9.39

route from Gloucester to Swindon. The scheme has four key objectives, including economic growth: "to help boost growth and prosperity by making journeys more reliable and improving connectivity".

5.75 The Development Consent Order was approved in November 2022 and works are expected to start in 2023.

5.76 Whilst both projects will provide improvements to the local infrastructure and could result in higher levels of demand than would have been suggested by past trends in isolation, it is important to recognise that the standard method calculation for housing need incorporates a significant uplift to the trend-based figures.

5.77 The household projections identified a trend-based growth of 305 households each year at step 1 of the standard method calculation, but this is increased by 61.8% at step 2 as a consequence of the affordability adjustment.

5.78 Housing need identified by the standard method is therefore higher than the trend-based household growth, as the affordability adjustment helps meet the policy objective of significantly boosting the supply of homes. It is likely that strategic infrastructure will need to be delivered to help meet that policy objective and whilst more homes will be delivered, this will fundamentally enable the growth already captured within the standard method housing need rather than being additional to it.

Should the updated housing requirement be increased or decreased to protect areas or assets of particular importance?

5.79 National policy identifies several areas or assets of particular importance, which can provide a strong reason for restricting the overall scale, type or distribution of development in a plan area[38]. Of particular relevance to Cotswold District are:

- Cotswolds Area of Outstanding Natural Beauty / National Landscape (the AONB);
- Green Belt;
- Local Green Spaces;
- Irreplaceable habitats;
- Habitats sites (and those sites listed in paragraph 181 of the NPPF) and/or designated as Sites of Special Scientific Interest;
- Designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68 of the NPPF); and
- Areas at risk of flooding.

5.80 These issues can be considered at both the macro (district-wide) scale and micro (settlement / site specific) scale.

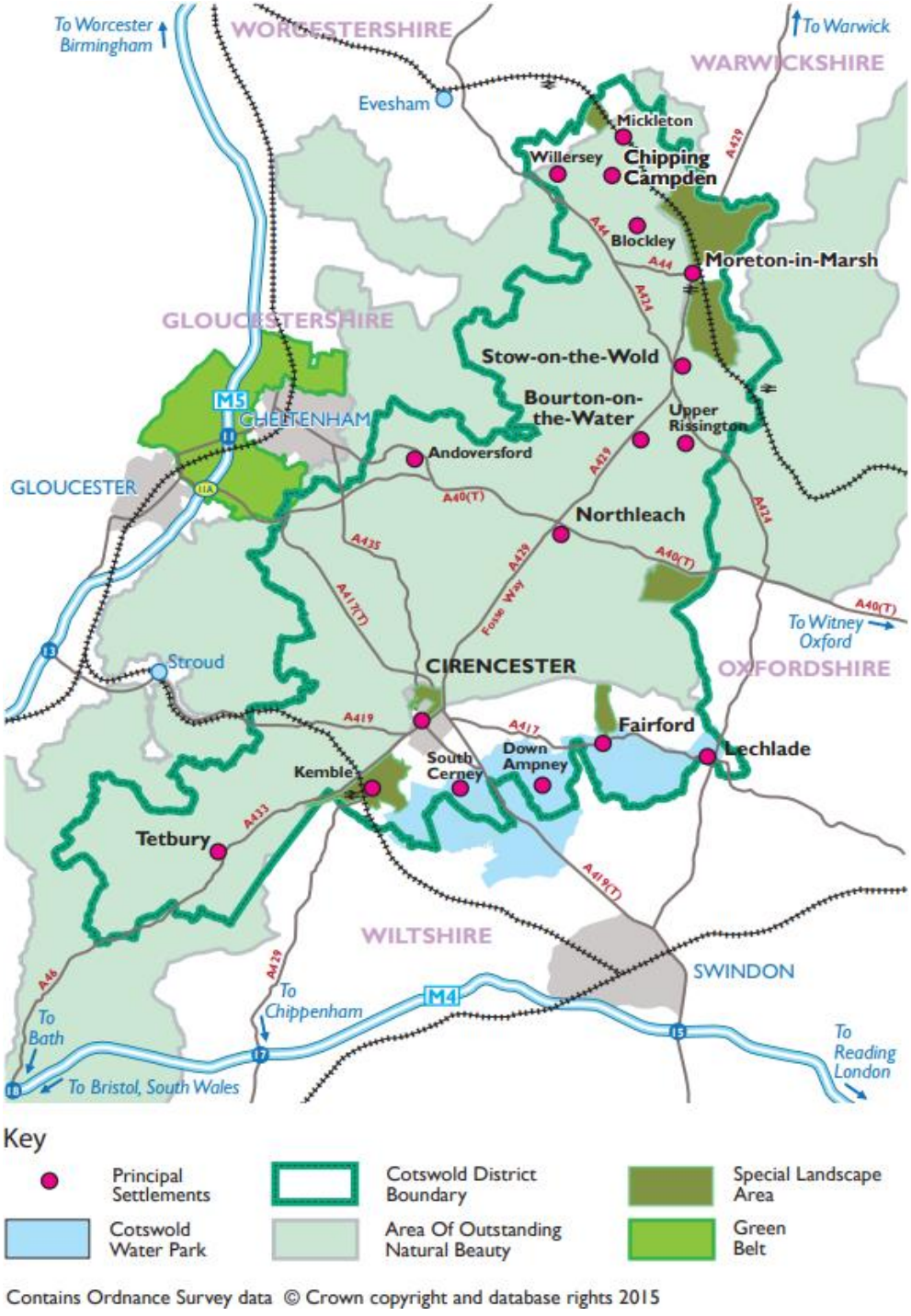
Macro (district-wide) scale

5.81 The AONB covers 80% of Cotswold District. A further 6% of the District is designated as a Special Landscape Area, much of which provides an important setting and an effective buffer for the AONB. A further 6% of the District is located within Cotswold Water Park, a large

[38] NPPF (2021) paragraph 11 and Footnote 7

proportion of which is designated as a Site of Special Scientific Interest[39]. The District also incorporates a small part of the Gloucester and Cheltenham Green Belt.

Figure 1: Map showing the Cotswolds AONB, Special Landscape Areas, Cotswold Water Park and the Gloucester and Cheltenham Green Belt



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5.82 The District also has:

- 33 registered historic parks and gardens
- 144 Conservation Areas (more than any other District in England)

[39] Cotswold Water Park confirmed as a Site of Special Scientific Interest

- 5,004 entries on the statutory list of buildings of special architectural and historic interest (second after City of Westminster)
- 238 Scheduled ancient monuments
- Various habitats sites, including:
  - 2 internationally designated Special Areas of Conservation
  - 37 other nationally designated Sites of Special Scientific Interest and 1 National Nature Reserve
  - Various other locally designated sites, such as Local Sites, Key Wildlife Sites and Local Nature Reserves
  - Various areas of Priority Habitat[40].

5.83 Many of these areas or assets are located within the 8% of the district that is not within the Cotswolds AONB, a Special Landscape Area, Cotswold Water Park or the Green Belt.

5.84 Eight of the District's Principal Settlements, as defined by Local Plan Policy DS1, are completely within the AONB[41]. A further five Principal Settlements are bound by the AONB on one or more sides and form part of the setting in the AONB[42].

5.85 National policy requires that great weight should be to be given to the conservation and enhancement of AONBs, which have the highest status of protection in relation to these issues. Furthermore, the scale and extent of development within AONBs is required to be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the AONB[43].

5.86 The existing Local Plan sought to meet the identified housing need in full, despite these extensive constraints. Furthermore, the rate of housing delivery in Cotswold District has been amongst the highest of any area with such constraints.

5.87 Although the standard method increases the housing need for the remaining years of the Plan, it is necessary to consider whether an increase in the housing requirement can be accommodated given the land constraints of the District. However, it is also appropriate to recognise that the identified housing need can be delivered in full without any further step-change to housing delivery.

5.88 It is clear that there would be arguments for setting a housing requirement below the identified housing need due to the land constraints. However, any unmet need would then need to be addressed, which would not be necessary if the identified need could be met in full within the District.

Should the updated housing requirement be increased or decreased to promote a sustainable pattern of development and mitigate climate change?

5.89 When the Local Plan was examined, it was found sound on the basis that housing delivery in the later part of the plan period would decrease in order to rebalance the extremely high

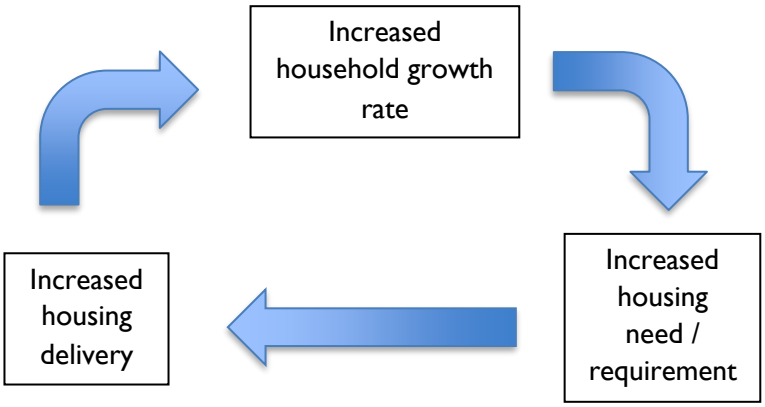
[40] These are wildlife habitats that are listed at section 41 of the Natural Environment and Rural Communities Act 2006 as being habitats of principal importance for biodiversity.
[41] Andoversford, Blockley, Bourton-on-the-Water, Chipping Campden, Northleach, Stow-on-the-Wold, Tetbury and Upper Rissington
[42] Cirencester, Kemble, Mickleton, Moreton-in-Marsh and Willersey
[43] NPPF (2021) paragraph 176

rates of delivery earlier in the plan period and, in so doing, the Local Plan would deliver sustainable levels of growth. Indeed, the District had not delivered anywhere near the average annual rate of growth prior to 2011. The Local Plan inspector considered that, "As the OAN assumes a population increase sufficient to fill all of the additional jobs expected to be created in the district, increasing the housing requirement further would be likely to lead to net out commuting and therefore longer journeys by private motor vehicles… Whilst the market in the district may be sufficiently strong to mean that adopting such an approach would be effective in driving up supply, a balance has to be struck in order to achieve sustainable development having regard to the high quality of the built and natural environment and the need to avoid long distance commuting."

5.90 Around 5,580 homes were delivered in the first half of the Local Plan period – 66% of the entire Local Plan housing requirement – with the annual delivery rate peaking at 911 dwellings in 2017/18. This compares to the average annual housing requirement of 420 homes a year.

5.91 The development strategy is playing out as planned and the average annual delivery rate between 2019/20 and 2022/23 has fallen back down to 350 homes a year (or 366 homes a year if an allowance for the net increase in bedrooms in communal accommodation is included).

5.92 The issue is now that housing requirements must be reviewed once every five years. Step 1 of the standard method formula for calculating housing need relies on household projections, which derive from household growth rates. The district's high level of over-delivery of housing will be reflected in the household growth rates, which will also increase. This means that future housing need calculations will also likely increase. The issue is self-perpetuating and results in an ever increasing housing need if the housing requirement is delivered in full.



5.93 If the housing requirement is not delivered in full, a situation arises where the Council is likely to not have a five-year housing land supply or fail the Housing Delivery Test. In this situation, plan-led development can be circumnavigated by applications for housing development in otherwise unsuitable locations and where there is likely to be less opportunity to deliver benefits, particularly mitigating the impacts of climate change by locating housing in the most accessible locations. Applications are instead determined in accordance with the NPPF's 'presumption in favour of sustainable development'.[44]

5.94 The Government's standard method approach continues to rely on 2014-based projections, which are informed by trends that largely pre-date the current Plan period. They therefore do not include the extreme peaks in housing delivery early in the Local Plan period and are therefore an appropriate basis on which to calculate the housing need.

[44] NPPF (2021) paragraph 11

5.95 The Plan seeks to ensure alignment between jobs and workers and minimise any additional net outward commuting. The Council is also seeking to provide as much affordable housing as possible, to ensure that local households can continue to live near to their families.

5.96 Whilst the Council recognises that many households want to live in the District, it is unlikely that any increase in the housing requirement could be accommodated given the land constraints. Despite these constraints, the existing Local Plan sought to meet the identified housing need in full and the rate of housing delivery in Cotswold District has been amongst the highest of any area with such constraints. However, it would be unsustainable for the housing requirement to be higher than the identified housing need as, counterintuitively, increasing the housing requirement results in an increased housing need and unsustainable rates of development for Cotswold District, which is a heavily constrained rural area.

6. Has the applicable local housing need figure changed significantly?

6.1 This part of the report specifically determines whether the applicable local housing need has changed significantly. This is a distinct from other sections of this report in that it will update the Council's review of the adopted Local Plan published in 2020, specifically the applicable local housing need figure. This is an important consideration in the balance of issues that determine whether the adopted Local Plan requirement should be updated. A further outcome is to guide the development management process in helping to determine planning applications.

What is the 'applicable local housing need' of Cotswold District?

6.2 NPPF (2021) paragraph 33 specifies (added emphasis):

> *Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary[20]. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy.* ***Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly****; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.*

Footnote 20:

> *Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).*

6.3 To be clear, the NPPF (2021) specifies that the measure is whether the local housing **need** figure has changed significantly. It does not say the measure is whether the housing requirement has changed significantly.

6.4 There are good reasons for this. For example, the adopted requirement may have been set lower than the applicable housing need figure (e.g. due to constraints or a lack of land availability) or it might have been higher (e.g. due to it including unmet need from another area, or there being a policy-based decision to aim for a requirement that was higher than the identified need). In the case of Cotswold District, the adopted C2 requirement is for the period from 2017 to 2031 and does not include the six year period from 2011 to 2017. The combined C2 and C3 adopted requirement is therefore incomplete and does not provide a like for like comparison with the current applicable housing need.

6.5 Notwithstanding this, consideration has been given to various scenarios of the original applicable housing need to provide further justification and rational.

Table 1: Tested scenarios of original applicable housing need

	Scenarios for original applicable housing need	Applicable housing need (August 2023)	Change to applicable housing need
Scenario 1: C3 and C2 need identified in OAN report (NMSS, 2014) (i.e. 8,448[45] + 217)	8,665 (433 per annum)	9,094 (455 per annum)	429 (4.95%)
Scenario 2: C3 need identified in OAN report (NMSS, 2014) and updated C2 need calculated with SHOP Tool during Local Plan examination (i.e. 8,448 + 322[46])	8,770 (422 per annum from 2011 to 2017) (443 per annum from 2017)	9,094 (455 per annum)	324 (3.69%)
Scenario 3: C3 need identified in OAN report (NMSS, 2014) and C2 need (calculated with SHOP Tool) identified in SHMA (2016) report (i.e. 8,448 + 419[47])	8,867 (422 per annum from 2011 to 2014) (447 per annum from 2014)	9,094 (455 per annum)	227 (2.56%)
Scenario 4: Adopted Local Plan combined C2 and C3 requirement (i.e. 8,400 + 322[48])	8,722 (420 per annum from 2011 to 2017)	9,094 (455 per annum)	372 (4.30%)
Scenario 5: Adopted Local Plan C3 requirement (i.e. 8,400)	8,400 (420 per annum)	9,094 (455 per annum)	694 (8.26%)
Scenario 6: C3 and C2 need identified in NMSS (2016 Update) report (i.e. 8,100 + 217)	8,316 (416 per annum)	9,094 (455 per annum)	778 (9.35%)

6.6 The applicable housing need scenarios range from 8,316 to 8,867 dwellings. The change in the housing need from the six scenarios ranges from 778 dwellings (9.35%) to 227 dwellings (2.56%).

6.7 Table 2 considers the advantages and disadvantages of each scenario.

[45] The 2014 OAN report's figures were published in Table 21A of The Objectively Assessed Housing Needs of Cotswold District (NMSS, December 2016)
[46] Based on the conversion of 580 bedspaces into an equivalent number of dwellings using the ratio provided by the Housing Delivery Test of 1 dwelling for every 1.8 C2 bedspaces.
[47] Based on the conversion of 755 bedspaces into an equivalent number of dwellings using the ratio provided by the Housing Delivery Test of 1 dwelling for every 1.8 C2 bedspaces.
[48] Based on the conversion of 580 bedspaces into an equivalent number of dwellings using the ratio provided by the Housing Delivery Test of 1 dwelling for every 1.8 C2 bedspaces.

Table 2: Appraisal of housing need scenarios of original applicable housing need

Scenario 1: C2 and C3 need identified in OAN Report (NMSS, 2014) (8,448 + 217)	
Advantages	**Disadvantages**
Covers whole Local Plan period from 2011 to 2031. Consistent with standard methodology in that it includes both C2 and C3 needs. The C3 use class need was applied to the adopted policy DS1 requirement. Consistent with NPPF (2021) paragraph 33, as it is a need figure and not a requirement figure. Uses non-rounded figures so includes all of the need. Consistency between methodologies for calculating C2 and C3 needs within the same report.	The C2 need was not applied to the adopted policy H4 requirement.
Scenario 2: C3 need identified in OAN Report (NMSS, 2014) and updated C2 need calculated with SHOP Tool[49] during Local Plan examination (8,448 + 322)	
Advantages	**Disadvantages**
Consistent with standard methodology in that it includes both C2 and C3 needs. Consistent with NPPF (2021) paragraph 33, as it is a need figure and not a requirement figure. The C3 need was applied to the adopted policy DS1 requirement. The C2 need was applied to adopted policy H4 requirement. Test whether the current applicable housing need affects both the C2 and C3 requirements of policies DS1 and H4. Uses non-rounded figures so includes all of the need.	Does not cover whole Local Plan period, as C2 need covers the period from 2017 to 2031. Inconsistency between methodologies for calculating C2 and C3 needs from two different reports.
Scenario 3: C3 need identified in OAN Report (NMSS, 2014) and C2 need (calculated with SHOP Tool) identified in SHMA (HDH, 2016) (8,448 + 419)	
Advantages	**Disadvantages**
Consistent with standard methodology in that it includes both C2 and C3 needs. Consistent with NPPF (2021) paragraph 33, as it is a need figure and not a requirement figure. The C3 need was applied to the adopted policy DS1 requirement.	Does not cover whole Local Plan period, as C2 need covers the period from 2014 to 2031. C2 need was not applied to the adopted policy H4 requirement. Inconsistency between methodologies for calculating C2 and C3 needs from two different reports.

[49] Strategic Housing for Older People Analysis Tool – assessment done in 2017

Same methodology as 2016 SHMA and covers more of the Local Plan period than the adopted policy. Uses non-rounded figures so includes all of the need.	
Scenario 4: Adopted Local Plan combined C2 and C3 requirement (8,400 + 322)	
Advantages Consistent with standard methodology in that it includes both C2 and C3 needs. Tests whether the change in need affects the adopted policies.	**Disadvantages** Does not cover whole Local Plan period, as the C2 need covers the period from 2017 to 2031. Inconsistent with NPPF (2021) paragraph 33, as it is a requirement figure and not a need figure. Uses rounded figures so excludes some of the need. Inconsistency between methodologies for calculating C2 and C3 needs from two different reports.
Scenario 5: Adopted Local Plan C3 requirement (8,400)	
Advantages Covers whole Local Plan period from 2011 to 2031. Test whether the current applicable housing need affects the C2 requirement of policy DS1.	**Disadvantages** Inconsistent with the standard methodology, as it does not include the C2 requirement. Inconsistent with NPPF (2021) paragraph 33, as it is a requirement figure and not a need figure. Does not test whether the current applicable housing need affects the C2 requirement of policy H4. Uses rounded figures so excludes some of the need.
Scenario 6: C3 and C2 need identified by OAN Update (NMSS, 2016) (8,100 + 217)	
Advantages Covers whole Local Plan period from 2011 to 2031. Consistent with standard methodology in that it includes both C2 and C3 needs. Consistent with NPPF (2021) paragraph 33, as it is a need figure and not a requirement figure. Was the last housing need assessment before the standard methodology was introduced, although on this logic a previous figure produced from the standard methodology is equally applicable. Uses non-rounded figures so includes all of the need.	**Disadvantages** Was not applied to the adopted Local Plan policies. Paragraph 6.1.1 of the adopted Local Plan explains the District's objectively assessed need was 8,400 (rounded) and not the 8,100 dwellings in the 2016 update of this report). 8,100 dwellings is a rounded figure, whereas the other figures are unrounded. The 217 figure derives from the analysis underwriting the 8,400 OAN and there is no equivalent table for the 8,100 figure. Does not test whether the current applicable housing need affects the C2 or C3 requirements of policy DS1 and H4.

Consistency between methodologies for calculating C2 and C3 needs within the same report.	

6.8 On balance, Scenarios 1 and 2 are the most consistent with national policy and guidance. Scenario 2 was applied to the adopted Local Plan policies but does not contain a C2 need for the entire Local Plan period. Scenario 1, however, contains the C3 need that was applied to Policy DS1 and a C2 need for the entire Local Plan period, which was assessed in the same report as the C3 need. It is therefore reasonable to use Scenario 1 as the applicable local housing need.

Defining 'significant change'

6.9 Neither the NPPF (2021) or the Planning Practice Guidance provide a specific definition of what is meant by a "significant change" to help determine whether the applicable local housing need figure has changed significantly. However, NPPF (2021) paragraph 74(c) provides a definition of "significant" to determine whether there has been a significant under delivery of housing (added emphasis):

> *The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of 20% where there has been **significant under delivery of housing** over the previous three years, to improve the prospect of achieving the planned supply[41].*
>
> *Footnote 41 This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.*

6.10 In other words, the NPPF (2021) defines "significant" when determining the level of under delivery to mean a shortfall of more than 15% of the housing requirement over the previous three year period.

6.11 There is a strong relationship between the application of significant in NPPF (2021) paragraphs 33 and 74(c). For example, both terms relate to the measurement of housing; both can apply to a measurement of the local housing need – as confirmed by the Housing Delivery Test Measurement Rule Book[50]; and both are used in the NPPF (2021) (as opposed to two separate documents where there may be greater scope for a variance between the two meanings). The meaning of significant in paragraph 74(c) is a reliable and useful indicator of what paragraph 33 means as significant.

6.12 The NPPF (2021) paragraph 74(c) definition of significant relates solely to a percentage figure (i.e. a percentage of the housing requirement or local housing need over the previous three year period). It does not specify an absolute figure for the number of homes that are considered to be significant. Paragraph 74(c) instead recognises that the measurement of significance can be different according to the individual circumstances of each local planning authority.

6.13 If the 15% increase were to be applied in the context of paragraph 34, the 8,665 dwelling applicable local housing need results in a figure of 9,965 dwellings (a change of 1,300 dwellings).

6.14 NPPF (2021) paragraph 74(c) provides further guidance in terms of the time period the change applies to. Significant under delivery of housing is determined to be under-delivering more

[50] Housing Delivery Test Measurement Rule Book: Method for calculating the Housing Delivery Test result (MHCLG, July 2018)

than 15% of the housing requirement over the previous three year period. However, the applicable change to the housing need in Cotswold District applies to the Local Plan period. It is less of an issue to deliver housing over a longer time period.

6.15 Further definition of the meaning of 'significant' is provided in several dictionaries.

- Cambridge Dictionary: *important or noticeable*
- Collins English Dictionary: *important, notable, or momentous* (in terms of statistics, this it is defined to be "*of or relating to a difference between a result derived from a hypothesis and its observed value that is too large to be attributed to chance and that therefore tends to refute the hypothesis*")
- Dictionary.com: *important and deserving of attention; of consequence*
- Oxford Learner's Dictionary: *large or important enough to have an effect or to be noticed*

6.16 Whether something is noticeable, important, momentous, or of consequence supports the notion that whether something is significant or not requires context. For example, as a simple thought experiment, an increase in the housing need by one dwelling may not immediately be perceived to be noticeable or important. However, if the original housing need was for two dwellings, the one dwelling increase would be important enough to have effect and would be deserving of attention. Similarly, if there is an increased need for 1,000 dwellings, this may initially appear to be a large increase but if the housing need is for 660,000 homes over a ten year period or 66,000 a year (e.g. in the London Plan[51]), then the increase may not be considered to be significant and even more so in the context of a city area containing 3.7 million homes and an expected growth rate of 70,000 people per annum to 2040[52].

6.17 In summary, the NPPF (2021) definition of 'significant under delivery' being 15% of the housing requirement over the previous three year period is a it is a reliable and useful indicator of what the NPPF means as significant. Whether there has been a significant change to the housing need requires an understanding of whether the change is large or important enough to have an effect or to be noticed, which must relate to the local context. Ultimately, whether the change is significant is a matter of judgement for each local planning authority.

Has the housing need changed significantly from an evidence-based analytical perspective?

6.18 If the applicable housing need figure has changed significantly, then it will be necessary to update the relevant strategic policies. However, if there has not been any significant change then the Council can continue to rely on the existing adopted policies.

6.19 Given the importance of this issue, the Council has commissioned Opinion Research Services (ORS), the consultancy that prepared the latest Gloucestershire Local Housing Needs Assessment, to review the evidence and consider whether or not there has been a significant change to the applicable local housing need figure based on their professional judgement.

6.20 That independent review is provided as a separate Annex.

6.21 The conclusions of the review set out the applicable local housing need figures in context to consider the possible significance of any change (paragraphs 34-36):

[51] As set out at paragraph 4.1.1 of The London Plan (March 2021)
[52] https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf page 13 and Number of housing units in London from 2001 to 2021

The applicable local housing need figure was 8,665 dwellings at the time that the Local Plan was adopted. The updated housing need figure has been calculated to be 9,094 dwellings. Although there is an absolute difference of 429 dwellings between the two specific figures, neither the original assessment nor the standard method calculation should be considered to represent a precise or definitive figure. Instead, both figures provide a reasonable estimate of the scale of housing that is likely to be needed over the plan period.

The original figure was based on a range of 7,800 to 9,500 dwellings (equivalent to an average of 390 dpa to 475 dpa) with a midpoint of 8,700 dwellings (435 dpa). The updated housing need figure (9,094 dwellings, equivalent to an average of 455 dpa) falls within that original range.

The difference of around 400 dwellings is equivalent to a change of 4.95% and represents an average of only 20 dpa. Based on the various different uncertainties set out above, it is reasonable to conclude that this limited change will fall well within the margins of error associated with the two estimates.

6.22 The review goes on to conclude (paragraph 41):

*The updated housing need figure represents a change of less than 5% and that is far lower than the threshold of 15% that the Framework considers to be significant in the context of housing delivery. **Given this context, we can reasonably conclude that the applicable local housing need figure for Cotswold district has not changed significantly.***

6.23 Therefore, having reviewed the evidence relevant to the applicable local housing need figure, the report concludes that there has not been a significant change from an evidence-based analytical perspective.

6.24 However, it is also important to consider whether it would be reasonable to conclude that there had been a significant change from a planning perspective.

Has the housing need increased significantly in absolute terms?

6.25 The applicable housing need of 8,665 dwellings is 429 dwellings (4.95%) lower than the current applicable housing need of 9,094 dwellings.

6.26 It could be argued that a 429 dwelling development in a single location is a large development site. Likewise, it could be argued that a one dwelling development would be impactful on its immediate surroundings. However, the real terms impact of the district-wide 429 dwelling increase is set against the Council's development strategy (or simply the district), not a single development site or a single settlement. Furthermore, the measure is whether the change in housing need is significant, not the significance of a specific development site on its environs.

6.27 The NPPF (2021) does not specify an absolute number of homes that is a significant change to the housing need. If the government had meant to include an absolute number on what it defines to be significant, it would have done so. As previously discussed, NPPF (2021) paragraph 74(c) is a reliable and useful indicator of what the NPPF considers to a significant amount of housing. This uses a percentage figure of the housing requirement and the measure of significance therefore reflects the individual circumstances of each local planning authority.

6.28 The Housing Delivery Test Measurements between 2018 and 2021 identify numerous instances where under delivery of housing in excess of 400 homes a year have not been

considered to be a 'significant under delivery of housing'. In one example, Tower Hamlets delivered 802 dwellings less than its requirement of 10,146 homes for the three year period from 2018/19 to 2021/22[53]. The 802 dwelling shortfall is not deemed by NPPF (2021) paragraph 74(c) to be significant.

Table 3: Authorities that have not significantly under delivered housing[54]

Local Planning Authority	2021	2020	2019	2018
Barnet	–	419	692	–
Bradford	–	486	–	–
Bristol, City of	–	–	766	–
Camden	–	–	436	–
Greenwich	–	700	656	–
Hackney	–	424	617	–
Kirklees	561	706	–	–
Lewisham	514	492	–	–
Milton Keynes	–	–	–	679
Southwark	670	–	495	–
Tower Hamlets	802	–	–	–

6.29 Using the NPPF (2021) paragraph 74(c) definition of "significance", Tower Hamlets could have under delivered by as much as 1,522 homes (15%) of its 10,146 requirement and, in absolute terms, this still would not have been considered by the NPPF to be a significant number of homes.

6.30 Further comparison is made with similar rural authorities to Cotswold District, which also have a large proportion of Area of Outstanding Natural Beauty and / or Sites of Special Scientific Interest. This further demonstrates that even in these authorities, under delivery in excess of 400 dwellings per year would not be considered by NPPF (2021) paragraph 74(c) to be a significant number of homes.

Table 4: Comparison with rural authorities with large percentage of AONB or SSSI[55]

Local Planning Authority	Percentage AONB or SSSI	Housing Delivery Test Requirement	15% of Housing Delivery Test Requirement
Dorset	58%	6,758	1,014
Wiltshire	52%	5,239	786
South Hams	55%	3,385	508
West Devon	54%	3,385	508
Wealden	65%	3,179	477

6.31 Although these examples show that upwards of 400 dwellings can be considered by the NPPF (2021) to not be a significant number of homes for a constrained rural authority, it is again important to highlight that these figures relate to a three year period. The change in housing need in Cotswold District relates to the 20 year Local Plan period.

[53] See Housing Delivery Test: 2021 measurement
[54] Source: Housing Delivery Test Measurements (2018 to 2021)
[55] Source: Housing Delivery Test 2021 Measurement

6.32 To summarise, NPPF (2021) paragraph 34 does not provide an absolute number of homes that is a significant change. NPPF (2021) paragraph 74(c) provides a reliable and useful indicator of what the NPPF considers to a significant amount of housing. In accordance with paragraph 74(c), as much as 1,522 homes can be considered as not being a significant number in an urban authority and 1,014 homes in a rural authority. However, the absolute number of dwellings cannot be considered in isolation. Determining whether there has been a significant change requires local context to measure the impact of the change and whether it is "large or important enough to have an effect or to be noticed", as per the Oxford Learner's Dictionary definition.

Have any Neighbourhood Development Plan examinations found the housing need has changed significantly?

6.33 NPPF (2021) paragraph 66 requires that (added emphasis):

> *Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, **unless there has been a significant change in circumstances that affects the requirement**.*

6.34 Cotswold District has eight 'made' Neighbourhood Development Plans (NDP), none of which have sought to retest the Local Plan housing requirement[56]. The most recent NDP to be made, the Fairford NDP, includes a residential site allocation. At the time of both the NDP examination and the Examiner's report, the local housing need of the District calculated by the standard methodology was 533 homes a year.

6.35 A requirement of the Fairford NDP Examiner would have been to test the NDP against the NPPF (2021) and consider whether the housing need had changed significantly. However, neither the representations made to the Fairford NDP nor the Fairford NDP Examiner raised the change to the local housing need as an issue and the NDP was recommended for approval on that basis. The local housing need of the District has subsequently decreased from 533 to 493 homes a year.

Does the change in the applicable housing need prevent the delivery of the adopted Local Plan vision, policy objectives or spatial strategy?

6.36 The change to the housing need does not affect the delivery of the Local Plan vision. Of particular note, the Local Plan vision expected that the Local Plan will have "*supported the delivery of a range of housing that helps to meet the requirements of all sections of the community*" and that, "*The development needs of communities, businesses, and visitors will have been enabled taking particular account of: climate change and flood risk; the area's internationally recognised natural, built and historic environment; and the provision of adequate supporting infrastructure.*"

6.37 The change to the housing need also does not affect the delivery of the Local Plan objectives. Of particular note, Objective 2a of the Local Plan is:

[56] The eight made neighbourhood development plans are: Fairford; Kemble and Ewen; Lechlade on Thames; Northleach with Eastington; Preston; Somerford Keynes and Shorncote; South Cerney; Tetbury and Tetbury Upton

Through establishing the District's OAN for the Plan period and allocation of land, provide an adequate supply of quality housing, of appropriate types and tenures, to at least meet objectively assessed needs.

6.38 Taking account of additional dwellings that have been released to the market resulting from the net increase in bedrooms in communal accommodation, the District is expected to deliver 9,904 dwellings over the Local Plan period. This is 810 dwellings (8.9%) more than the updated housing need of 9,094 dwellings for the Plan period. The Council's Housing Land Supply Report has assessed the deliverability of sites in detail. This evidence demonstrates that the Council has a deliverable and developable housing land supply.

6.39 When the Local Plan was examined, the development strategy was found 'sound' on the basis that housing delivery in the later part of the plan period would decrease in order to rebalance the extremely high rates of delivery earlier in the plan period. In so doing, the Local Plan would deliver sustainable levels of growth. Indeed, the District had not delivered anywhere near the average annual rates of growth in the first half of Plan period prior to 2011. Notwithstanding this, the annual delivery rates of housing have been, and are currently expected to be, delivered as envisaged at the time the Local Plan was examined. In accordance with the examined development strategy, the average annual delivery rate between 2019/20 and 2022/23 has fallen back down to around 350 dpa (or 366 homes a year if an allowance for the net increase in bedrooms in communal accommodation is included).

6.40 Local Plans often include a larger housing land supply than the housing requirement in order to provide a flexible housing land supply in case any sites are not delivered or if there are any delays to the delivery of sites. For example, at the point of adoption, the extant Local Plan sought to deliver 9,614 dwellings (14% more than the 8,400 dwelling housing requirement). This has proven to be effective. The flexible housing land supply has ensured that the adopted Local Plan housing requirement and the updated housing need continue to be delivered in full.

6.41 In summary, the change to the housing need does not affect the delivery of the adopted Local Plan spatial strategy, which is provided by Polices DS1-DS4. Of particular note, the current applicable housing need is able to be fully delivered in accordance with the spatial strategy and without an update to these policies. Furthermore, the Council is able to continue to maintain a five year housing land supply and pass the Housing Delivery Test.

Does the change in the applicable housing need prevent the delivery of the NPPF (2021)?

6.42 In determining whether the change in the local housing need is significant, it is helpful to quantify the impact of the increase in terms of whether the adopted Local Plan requirement continues to deliver the requirements of the NPPF (2021).

6.43 Key NPPF (2021) policies include:

Paragraph 11. *Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*

ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

Paragraph 15. *The planning system should be genuinely plan-led.*

Paragraph 31. *The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.*

Paragraph 60. *To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.*

6.44 Taking account of the increased housing need, earlier sections of this report demonstrate that the adopted Local Plan housing requirement(s) continue to deliver all aspects of these NPPF (2021) policies. The housing requirement also significantly boosts the supply of housing. Furthermore, adequate and proportionate changes to the adopted Local Plan are currently being undertaken in the Local Plan Partial Update to make further improvements. The increased housing need is therefore insignificant in this context.

Summary of whether applicable local housing need figure has changed significantly

6.45 National policy and guidance require relevant strategic policies to be updated at least once every five years if the applicable local housing need figure has changed significantly. The current applicable housing need for the Local Plan period is 9,094 dwellings. Analysis of a range of scenarios has been undertaken to establish the original applicable local housing need figure, which concludes Scenario 1 (8,665 dwellings) has the most justification. The 429 dwelling increase (4.95%) is equivalent to an increased average annual delivery rate from 433 to 455 homes a year across the 20 year Local Plan period.

6.46 Scenario 2, which also has reasonable justification, provides a change of as little as 324 dwellings (3.69%). Scenario 6 includes the largest change (778 dwellings or 9.35%), although this scenario perhaps has the weakest justification of the six that were considered.

6.47 National policy and guidance do not specifically define what a significant increase in housing need means. However, the meaning of significant (i.e. more than 15% of the housing requirement over the previous three year period) provided by NPPF (2021) paragraph 74(c) is a reliable and useful indicator of what a significant change to the housing need could mean. Whether there has been a significant change to the housing need also requires an understanding of whether the change is large or important enough to have an effect or to be noticed, which must relate to the local context. Ultimately, however, whether the change is 'significant' is a matter of judgement for each local planning authority.

6.48 None of the six scenarios that were tested increase the housing need beyond 9.4%. They all fall well below the 15% threshold that NPPF (2021) paragraph 74(c) indicates to be a significant proportion of the housing requirement.

6.49 ORS has undertaken specific analysis of whether the local housing need has changed significantly. This finds that the original applicable housing need was based on a range of 7,800 to 9,500 dwellings (equivalent to an average of 390 dpa to 475 dpa) with a midpoint of 8,700 dwellings (435 dpa). The updated housing need figure (9,094 dwellings, equivalent to an average of 455 dpa) falls within that original range. Based on various different uncertainties with the calculating housing needs, ORS conclude that it is reasonable that this limited change will fall well within the margins of error associated with the estimates of the original and current applicable housing need figures.

6.50 None of the eight Neighbourhood Development Plan (NDP) examinations have found the local housing need to have changed significantly, which is a requirement of NPPF (2021) paragraph 66.

6.51 The change to the applicable housing need continues to enable the delivery of the adopted Local Plan vision, policy objectives and spatial strategy without an update to the adopted Local Plan policies. In particular, the adopted Local Plan policies deliver the increased housing need in full.

6.52 The change to the applicable housing need continues to enable the delivery of the NPPF (2021) policies without an update to the adopted Local Plan policies. In particular, the adopted Local Plan policies continue to boost the supply of housing, enable plan-led development, pass the Housing Delivery Test and maintain a five year housing land supply. There has also never been a "has never been a 'significant under delivery of housing' in Cotswold District.

6.53 In conclusion, the change to the local housing need is not large or important enough to have an effect or to be noticed. The adopted Local Plan housing requirement(s) already fully delivers the increased need.

7. Conclusion: a review of the housing requirement

7.1 The NPPF (2021) requires strategic policies, including policies that identify the housing requirement, to be reviewed at least once every five years to assess whether they need updating[57]. The Government has also established a nationally prescribed 'standard method' for calculating housing need.

7.2 The Council undertook a review of its Local Plan policies, including the housing requirement, in June 2020[58]. This found that it was necessary to consider the implications of the housing need figure resulting from the standard methodology to establish whether any strategic policies needed updating.

7.3 In reviewing the housing requirement for the period 2011 to 2031, it is appropriate to maintain the housing requirement endorsed by the Local Plan Inspector (an average of 420 dwellings per year) for the period up until five years after the Local Plan was adopted. This equates to 5,180 dwellings over the first 12 years and 4 months of the Plan.

7.4 However, as previously noted, this figure did not allow for the increase of residents living in communal establishments as the supply of Use Class C2 (residential institutions) was monitored separately. This yields a need for 217 additional dwellings over the plan period (an average of 11 dwellings per annum).

[57] National Planning Policy Framework (2021) paragraph 33
[58] A Review of the Adopted Cotswold District Local Plan (2011 to 2031) (CDC, 3 June 2020)

7.5 The overall housing need (including communal accommodation) totals 5,314 dwellings over the first 12 years and 4 months of the Plan.

7.6 Based on the latest data, the standard method calculation identifies that the local housing need for the District to currently be 493 dwellings per year[59]. However, the housing requirement endorsed by the Local Plan Inspector applies until 31 July 2023 (together with an adjustment of 11 dwellings per year to ensure consistency in the way that the net increase in bedrooms in communal accommodation is now counted). The updated need figure will apply for the remaining Local Plan period.

7.7 On this basis, the overall housing need for the 20-year period from 1 April 2011 to 31 March 2031 can be calculated:

Housing Need = 12 $^{1}/_{3}$ years x (420 + 11) + 7 $^{2}/_{3}$ years x 493 = **9,094 dwellings**

Or

Housing Need = 5,315 + 3,779 = **9,094 dwellings** [60]

7.8 The applicable local housing need figure is now 429 dwellings (4.95%) higher than the applicable figure at the time that the Local Plan was adopted (on a like-for-like basis). Whilst the Council does not consider this to be a significant change, it is appropriate to consider whether the housing requirement should be increased.

7.9 The adopted Local Plan strategic policies identify a minimum requirement of 8,400 dwellings in Use Class C3 over the 20-year period 2011-2031 (equivalent to an average of 420 per year) and a separate requirement of 580 nursing and residential care bedspaces (C2 use class) over the 14-year period 2017-2031 (equivalent to an average of 41 bedspaces per year). Based on the Housing Delivery Test equivalence calculation[61], the two policies represent a combined minimum requirement of 8,722 dwellings (an average of 436 dwellings per annum for the 20 year plan period and 443 dwellings per annum from 2017 onwards). These figures were endorsed by Inspector that examined the Local Plan on the basis that it would meet the identified C2 and C3 use class housing need in full.

7.10 This can be compared to the updated local housing need figure of 9,094 dwellings over the 20-year period 2011-2031, which incorporates both C3 dwelling and C2 communal accommodation needs. Notwithstanding that the adopted Local Plan C2 requirement excludes the period between 2011 and 2017, the 8,722 dwelling adopted combined requirement (as it appears in the plan) is 372 dwellings (4.3%) less than the updated local housing need.

7.11 The updated local housing need represents an average of 455 dwellings per year over the plan period, which is fractionally higher than the adopted Local Plan strategic policies, but the difference is only 2.7% (12 dwellings per year) compared to the average 443 dwelling per annum combined requirement from 2017 onwards. The strategic policies specify that the housing requirement is a minimum and a buffer of at least 5% is routinely maintained in terms of housing supply. The updated Local Plan strategic policies will continue to do so.

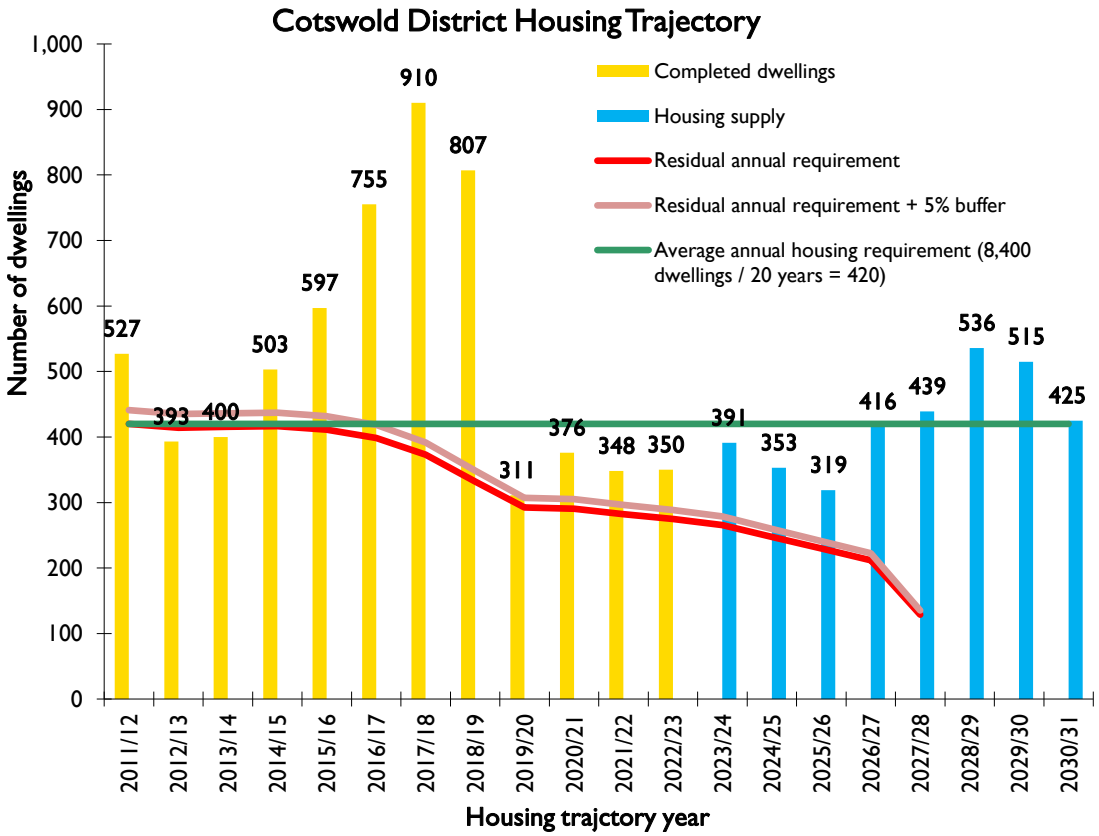
[59] As calculated in April 2023 by the Planning Practice Guidance on Housing and economic needs assessment (DLUHC and MHCLG, updated 16 December 2020)

[60] Calculated using non-rounded figures from household projections and the standard method for assessing housing need

[61] "*The ratio applied to other communal accommodation will be based on the national average number of adults in all households, with a ratio of 1.8*" (para. 11 of the Housing Delivery Test Measurement Rule Book, MHCLG, July 2018). 580 bedspaces = 322 dwellings.

7.12 The housing trajectory included within the Council's Housing Land Supply Report provides an annualised estimate of housing delivery up to 2031[62]. This is based on the current housing land supply of sites with planning permission, remaining Local Plan site allocations and an allowance made for homes delivered as windfalls. It does not include any additional sites that may be allocated by the Local Plan Partial Update.

7.13 The housing trajectory estimates that 3,264 dwellings will be delivered between 1 August 2023 and 31 March 2031, which, when added to the 6,407 dwellings that are expected to have been delivered between 1 April 2011 and 31 July 2023, will yield an overall total of 9,671 dwellings over the 20-year Local Plan period.



7.14 In addition to the housing delivered over the Local Plan period, it is also expected that 233 additional homes will be released to the market resulting from the net increase in bedrooms in communal accommodation developments over the plan period. These do not count towards delivering the adopted minimum 8,400 dwelling C3 housing requirement but, due to the way housing needs are calculated, they do count towards the updated housing need for the Local Plan period. In accordance with the Planning Practice Guidance[63], they also count towards the delivery of the updated housing need.

7.15 Overall, as of 1 April 2023, it estimated that the total supply of housing over the plan period that counts towards delivering the updated housing need will be 9,904 dwellings.

7.16 Whilst the adopted housing requirement sets a minimum that is lower than the updated housing need, the housing supply clearly demonstrates that the existing strategic policies are

[62] Cotswold District Housing Land Supply Report (CDC, 2023)
[63] PPG: Housing supply and delivery - Counting other forms of accommodation (Paragraph: 034 Reference ID: 68-034-20190722 and Paragraph: 035 Reference ID: 68-035-20190722, DLUHC, 22.07.2019)

likely to deliver sufficient new homes to meet the identified housing need over the Local Plan period in full. Having considered the evidence, on balance there does not appear to be justification for the housing requirement to be any higher than the identified need, and given the land constraints across the district, there could be argument for a lower requirement. The Council therefore does not believe that any increase beyond the identified need is justified.

7.17 The Council has reviewed the strategic policies in this context, and based on a comprehensive and detailed evaluation has concluded that the housing requirement identified by **Policy DS1 does not require updating**, particularly given that the development strategy of the adopted Local Plan is on course to deliver nearly 10,000 new homes. This is considerably higher than the housing need of 8,400 dwellings that was originally identified, and housing supply is likely to comfortably exceed the updated housing need of 9,094 dwellings based on the Government's standard method for the remainder of the Plan period.

7.18 Whilst the adopted housing requirement is lower than the updated housing need, the Council will continue to maintain that the housing requirement is a minimum, not a maximum, when determining planning applications. In this regard, the Council will consider whether any additional sites should be allocated for housing to provide further flexibility and/or to address ambitions contained within the Council's corporate plan.

Reviewing whether the housing need figure for Cotswold has changed significantly

Introduction and Context

1. At the time that the Cotswold District Local Plan was adopted, the evidence showed an overall housing need figure of 8,665 dwellings for the 20-year plan period. The updated housing need figure has been calculated to be 9,094 dwellings, which is 429 dwellings higher than the need that informed the adopted plan.

2. Paragraph 33 of the Framework states that *"Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly"*.

3. Given this context, Cotswold District Council has commissioned Opinion Research Services (ORS) to consider whether the latest evidence represents a **significant** change to the applicable local housing need figure for their area.

Reviewing the Housing Need

4. Although the adopted housing requirement reflected a housing need figure of 8,400 dwellings at that time, it is important to recognise that this was never intended as a definitive assessment of the precise level of housing need. Instead, the figure simply provided an estimate of the scale of housing supply that was likely to be needed in Use Class C3 (dwelling houses) over the plan period.

5. The evidence-based for the figure was set out in the report *"An Updated Estimate of the Objectively Assessed Housing Needs of Cotswold District"* (NMSS, March 2016). This concluded that 6,800 homes were needed to meet the demographic Objectively Assessed Need (OAN) but that it was necessary to consider whether an increase was needed to ensure alignment with economic growth.

6. Although the report concluded that there was no need to increase the number of homes above the demographic OAN based on the most recent jobs forecasts for the Gloucestershire Housing Market Area, it was noted that the countywide forecasts had been relatively volatile given that a similar analysis undertaken 18 months earlier (in October 2014) had suggested that 1,300 homes would need to be added to the demographic OAN. A similar adjustment at the time of the update would have yielded a total of around 8,100 homes.

7. The study also undertook a 'standalone analysis' which considered the job forecasts for Cotswold District in isolation, which identified two ranges for the 20-year period 2011-2031:

   » 7,600 to 9,300 homes (with a mid-point of 8,400 homes) based on unadjusted jobs forecasts produced by Oxford Economics and Cambridge Econometrics

   » 7,700 to 8,800 homes (with a mid-point of 8,300 homes) based on an alternative scenario prepared by Nupremis, which adjusted for unlikely or implausible elements in both forecasts

8. The latter range was considered to be more realistic, but it was noted that there was little difference between the mid-points.

9. Given the concerns about the countywide economic forecasts, the assessment gave more weight to the 'standalone analysis' and proposed that the higher of the two midpoint figures (8,400 homes) represented the most appropriate housing need figure at that time. Clearly this was never a definitive assessment, but it provided a reasonable estimate of the scale of housing likely to be needed based on the range of 7,600 to 9,300 homes that had been identified.

10. Due to the inherent imprecision, all figures were rounded to the nearest hundred homes. However, the subsequent report *"The Objectively Assessed Housing Needs of Cotswold District"* (NMSS, December 2016) presented the underlying analysis at Figure TA 21, and that identified an unrounded figure of 8,448 dwellings. This housing need figure related only to housing supply in Use Class C3 (dwelling houses). It did not take account of the increase of residents living in communal establishments, given that the housing supply in Use Class C2 (residential institutions) was monitored separately. However, the analysis also projected an increase of 366 residents living in communal establishments over the Local Plan period.

11. The Housing Delivery Test measurement rule book now sets out a calculation for equivalising that increase, and Census data identifies an average of 1.807 adults per household as the relevant conversion ratio for Cotswold District. On that basis, the identified increase equates to a total of 203 extra households, which yields a need for 217 additional dwellings based on the 6.55% rate that was assumed for dwellings without a usually resident household. Including that additional need yields an overall housing need of 8,665 dwellings.

12. Despite its specific nature, this figure simply provides an estimate of the scale of housing supply that was likely to be needed over the plan period, and in the same way as the original assessment rounded all outputs to the nearest hundred homes, it is appropriate for this figure to be considered within a range of 7,800 to 9,500 dwellings (equivalent to an average of 390 to 475 dpa) with a midpoint of 8,700 dwellings (435 dpa). This was the applicable local housing need figure for Cotswold district at the time that the Local Plan was examined and subsequently adopted.

Standard Method Calculation

13. The standard method was introduced when the Framework was revised in July 2018, based on a calculation set out in national planning guidance. Transitional arrangements at the time meant that the newly introduced standard method did not apply to Local Plans that had already been submitted for examination. Given this context, it is important to recognise that Planning Practice Guidance [ID 61-062-20190315] now states that (emphasis added):

> *Local housing need **will be considered to have changed significantly** where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is **significantly below** the number generated using the standard method*

14. Whilst the standard method did not apply at the time of the previous examination, it is possible to establish the need that would have been calculated using the approach at that time. Based on the relevant data for March 2016 (the date of the NMSS report) the standard method figure for Cotswold was 455 dpa.

15. One of the aims of the standard method was to simplify the Local Housing Need calculation, and the net increase in bedrooms in both student and other communal accommodation is now counted using ratios based on Census data as set out in the Housing Delivery Test measurement rule book. Therefore, it is important that any comparison also takes account of this need.

16. Although the standard method figure (455 dpa) was higher than the housing need figure that informed the adopted Local Plan (430 dpa, taking account of the need for Use Class C2 and Use Class C3) it was within the range that had been identified (390 to 475 dpa). Given that context, we can conclude that even though the Local Plan was adopted prior to the standard method being implemented, it was not on the basis of a number that was significantly below the number generated using the standard method at that time – so there can be no presumption that the local housing need figure will have inevitably changed significantly.

17. It is also important to recognise that the standard method itself does not provide a definitive assessment of housing need, and that it too simply provides an estimate of the scale of housing likely to be needed. The calculation uses two data sources to identify Local Housing Need – national household growth projections and the most recent median workplace-based affordability ratios – but neither of these is an exact measure and both are subject to uncertainty.

Household Projections

18. The first input to the standard method calculation is growth identified by the official household projections for the local area. This is based on past trends with a range of assumptions, and both factors introduce a degree of uncertainty.

19. The Office for National Statistics (ONS) has improved and updated the population data that had informed trends in the 2014-based projections used within the standard method. Revised figures suggest that growth originally estimated for Cotswold for the period 2008-2011 was around 30% too high, with original estimates for 2011-2014 being around 15% too low. However, 2021 Census data suggests that estimates for the period since 2011 are likely to have overestimated population growth in the district by around 5% and the figures are due to be revised again later this year.

20. Whilst we do not yet know how the figures will change, we can already conclude that the trends were never definitive. We also know that the projected household growth will incorporate any previous uncertainties – so there will inevitably be some variability within the projections due to errors in the estimates of past trends. It is not possible to attribute a specific level of statistical confidence to the official projections, but it is clear that variations are inevitably to be expected within the projected household growth as a consequence of these uncertainties.

21. The latest official projections provide variant scenarios that show the impact of assumptions, with high and low international migration variants resulting in household growth in Cotswold District being 10% higher or lower than the principal scenario, and domestic migration variants based on 2-year and 10-year trends being around 45% higher and 25% lower than the 5-year trend scenario. There is clearly uncertainty surrounding the assumptions taken, which again demonstrates that projections cannot be considered precise.

Affordability Ratios

22. The second input to the standard method calculation is an affordability ratio, based upon median workplace earnings and house prices. These figures are estimates, and the affordability ratio used within the standard method is calculated using provisional estimates for both. Revised estimates for Cotswold district have differed from the provisional figures by up to 3% for earnings and 2% for house prices over recent years, so the affordability ratio is subject to a combined uncertainty of up to 5% due to the reliance on provisional outputs.

23. Furthermore, the estimate for earnings is based on survey data from the Annual Survey of Hours and Earnings (ASHE) which itself is subject to survey error. Whilst the survey suggests that annual earnings in the Cotswold

have increased by an average of 3% per year over the period since 2011, the year-on-year changes have ranged from 6% points below to 10% points above this average. These fluctuations are largely due to the uncertainties associated with the survey estimate.

24. The most recent estimate of workplace earnings was for 2022, and that was subject to a confidence interval of between 5% and 10% (which means that actual earnings in the area may be up to 10% higher or 10% lower than the survey estimate). Estimates for previous years have been even less precise with confidence intervals between 10% and 20% in some years, and the district having no estimates of annual earnings published for three years (from 2015 to 2017) as the ONS considered the data to be *"unreliable for practical purposes"*.

25. On this basis, we can conclude that the affordability ratio is also subject to a degree of uncertainty – currently up to 10% associated with the confidence intervals for the survey data, and a further 5% due to the provisional nature of the estimates that are used.

Establishing Housing Requirement

26. The inherent uncertainty associated with assessing housing need is recognised by the plan-making system. Whilst the housing need figure provides an important basis for establishing the housing requirement, the requirement is routinely expressed as a minimum target. Plans also make provision to deliver a higher number of homes than the minimum requirement, and whilst this aims to provide flexibility it also recognises that the assessed need is imprecise.

27. In contrast, the housing requirement is a specific target that forms the basis for monitoring, and it is relied upon to determine the binary test of whether or not a five-year housing land supply can be demonstrated. Nevertheless, although the adopted housing requirement will be informed by the local housing need figure, it will have subsequently been subject to extensive scrutiny and testing through the planning process to ensure that it provides a robust and appropriate basis for the plan.

28. The Framework does not require the strategic policies that set out the housing requirement to be updated whenever the applicable local housing need figure has changed. It is only when such change is considered to be significant that the policies need updating. This recognises that the local housing need figure is not a definitive measure, and that it would not be proportionate for any change (regardless of its scale) to result in policies being updated. Instead, it is necessary to consider whether the identified change is meaningful.

29. This was properly recognised by the Inspector that examined the adopted Local Plan, for the housing need figure was updated at the time of that examination – from 8,400 dwellings down to 8,100 dwellings. Despite this reduction, the December 2016 report concluded:

The updated estimate of the Full OAN is 300 homes lower than the figure of 8,400 estimated in the March 2016 NMSS Report. That is a difference of 3.6% and as such is well within the error margins of this kind of analysis and typical of the changes that inevitably occur during the gestation period of a local plan. There is therefore no necessity to adjust the proposed housing requirement in the draft Local Plan

30. This reduction of 300 dwellings could have resulted in a housing allocation being removed from the Plan, which would arguably have been a significant change. However, the Inspector rightly took the view that the housing need figure had not changed significantly and therefore the housing requirement remained the same.

31. In determining whether or not a change to the applicable local housing need figure is likely to be significant, it is important to consider the way in which the figure is derived and the nature of the underlying data. More specifically, it is necessary to recognise the uncertainties that exist in order to determine whether the scale of housing that is likely to be needed over the plan period has significantly changed from when the need was originally assessed, or if changes are more likely to reflect the variability that is inherent within the underlying data sources.

32. Where there has been a change in the scale of housing likely to be needed, then evidently the applicable local housing need figure will have changed significantly. However, when the changes fall within the anticipated variability of the data, any change to the local housing need figure is unlikely to be significant. Therefore, to determine whether or not any change is significant, it is necessary to consider if any change is beyond the likely range of uncertainties that would be inherent within the figures.

Conclusions

33. At the time that the Cotswold District Local Plan was adopted, the housing requirement was based on a housing need figure of 8,400 dwellings at that time. However, it is important to recognise that this was never intended as a definitive assessment of the precise level of housing need. Instead, the figure simply provided an estimate of the scale of housing supply that was likely to be needed in Use Class C3 (dwelling houses) over the plan period.

34. Due to the inherent imprecision, the figure was rounded to the nearest hundred homes – but it was based on an unrounded figure of 8,448 dwellings. That did not take account of the increase of residents living in communal establishments, which represented an additional need of 217 dwellings on an equivalised basis – so the applicable local housing need figure was 8,665 dwellings at the time that the Local Plan was adopted.

The updated housing need figure has been calculated to be 9,094 dwellings. Although there is an absolute difference of 429 dwellings between the two specific figures, neither the original assessment nor the standard method calculation should be considered to represent a precise or definitive figure. Instead, both figures provide a reasonable estimate of the scale of housing that is likely to be needed over the plan period.

35. The original figure was based on a range of 7,800 to 9,500 dwellings (equivalent to an average of 390 dpa to 475 dpa) with a midpoint of 8,700 dwellings (435 dpa). The updated housing need figure (9,094 dwellings, equivalent to an average of 455 dpa) falls within that original range.

36. The difference of around 400 dwellings is equivalent to a change of 4.95% and represents an average of only 20 dpa. Based on the various different uncertainties set out above, it is reasonable to conclude that this limited change will fall well within the margins of error associated with the two estimates. Whilst there may have been some change to the overall level of housing need identified for the district, this is no more than would be expected as a result of the variability that is inherent within the underlying data sources. Given the limited difference between these two figures, it seems extremely unlikely that the overall scale of housing needed in the plan period has significantly changed from when the need was originally assessed.

37. Neither the Framework nor national planning guidance defines what level of change should be considered significant in the context of a change in the applicable local housing need figure. However, the Framework identifies that a buffer of 20% should be applied *"where there has been **significant** under delivery of housing"* which applies where *"delivery was **below 85%** of the housing requirement"* (paragraph 73 and footnote 39, emphasis added).

38. In other words, any shortfall must be 15% or more for it to be considered significant in that context.

39. It would seem equally reasonable to assume that a change in the applicable local housing need figure should also be 15% or more for that to be considered significant, in the context of the above analysis.

40. We have already concluded that although the Local Plan was adopted prior to the standard method being implemented, the standard method figure at that time was within the range identified by the evidence that had informed the Plan – so there is no presumption that the local housing need figure will have inevitably changed significantly.

41. The updated housing need figure represents a change of less than 5% and that is far lower than the threshold of 15% that the Framework considers to be significant in the context of assessing housing under delivery. **Therefore, we can reasonably conclude that the applicable local housing need figure for Cotswold district has not changed significantly.**

42. Of course, it might be argued that 400 dwellings would represent a significant housing allocation if that was to be delivered on a single site. However, in the same way as the Inspector that examined the adopted Plan concluded that it wasn't appropriate for an allocation of around 300 dwellings to be removed when the housing need figure reduced, the same approach applies equally in the context of the latest figures.

43. As the scale of housing need identified has not significantly changed, it would seem disproportionate for the strategic policies that set out the housing requirement to be updated at this time.

COTSWOLD DISTRICT COUNCIL

Council name	**COTSWOLD DISTRICT COUNCIL**
Name and date of Committee	**CABINET – 12 SEPTEMBER 2023**
Subject	**EMPLOYMENT AND HEALTH & SAFETY POLICIES**
Wards affected	None
Accountable member	Leader of the Council, Councillor Joe Harris
Accountable officer	Robert Weaver, Chief Executive Email: Robert.Weaver@cotswold.gov.uk
Report author	Zoe Campbell, Assistant Director, Organisational Effectiveness Email: democratic@cotswold.gov.uk
Summary/Purpose	To update the Cabinet relating to the refresh of all Human Resources and Health & Safety policies for CDC. No changes have been made to employee Terms and Conditions, only to clarify and enable policies to be used concurrently with employee relations matters, giving clarity and usability to both employees and managers alike.
Annexes	Annex A – Updated Employment and Health & Safety Policies.
Recommendation(s)	*That Cabinet resolves to:* *1) Agree the twenty-six employment policies and the Health & Safety Policy included in Annex A.* *2) Delegate authority to the Chief Executive to approve subsequent amendments to any Cotswold District Council employment policies that may be necessary in line with legal changes and best practice to ensure the Council's policies remain compliant.*
Corporate priorities	• Deliver the highest standard of service • Support health and wellbeing
Key Decision	NO
Exempt	NO

Consultees/ Consultation	A Task & Finish Group was set up to support the Chief Executive in ensuring that the 26 Cotswold District Council employment policies were updated. Publica worked with XpertHR and its recommended legal counsel, Markel LLP in order to update the policies. This approach ensured that all the policies could be used simultaneously and there was cohesion to mitigate future risk. Following this full refresh, in accordance with current employment law and in line with the Advisory, Conciliation and Arbitration (ACAS) Code, Cotswold District Council employed an external HR Consultant, Evelyn Fearon who worked with Publica's HR team, Head of HR, Assistant Director of Organisational Effectiveness with oversight from the Chief Executive to make additional amends to the six core policies and procedures to further clarify. These encompassed the policies identified by Overview & Scrutiny, as needing particular attention, namely: Anti-Harassment and Bullying, Disciplinary, Grievance, Equality, Diversity and Inclusion, Unauthorised Absence, Sickness Absence and Performance Management, and also Long Term Sickness Absence Publica's HRBP team consulted with the Trade Union on behalf of Cotswold District Council alongside the Counter Fraud & Enforcement Unit and the South West Audit Partnership before presenting them to Cabinet for approval. The Health and Safety Policy has been reviewed by the Trade Unions and Director of Governance and Development.

COTSWOLD DISTRICT COUNCIL

1. EXECUTIVE SUMMARY

1.1 At Full Council on 21 September 2022, it was recommended that a Task & Finish Group be set up under the Overview and Scrutiny Committee to oversee the progress and completion of updating and renewing the Council's employment policies.

2. BACKGROUND

2.1 The Overview and Scrutiny Committee on 4 October 2022 agreed to establish a Task and Finish Group to oversee a review of the Council's key HR policies. These are the policies which apply to those employees directly employed by Cotswold District Council including the statutory officers, the Counter Fraud & Enforcement Unit and those members of staff within Legal Services employed directly by Cotswold District Council. These policies do not apply to Publica employees for which a separate suite of policies exist.

2.2 Although outside of the Task & Finish Group's remit, the corporate Health & Safety Policy has also been reviewed and updated for consideration by Cabinet. Unlike the HR policies, the Health & Safety Policy includes elected members in its scope.

Core policies identified for update, but not limited to, included:

- Capability
- Grievance
- Harassment & Bullying
- Equality Diversity & Inclusion
- Performance Management
- Sickness Management
- Unauthorised Absence Management

2.3 The Task & Finish Group agreed to the following action plan:

- Terms of Reference were agreed November 2022 for Task & Finish Group with regular reporting to the Overview and Scrutiny Committee on progress.
- Officer oversight would be provided by the Chief Executive
- Publica HR team to work with XpertHR's Lawyers to ensure ACAS compliant, up to date, clear policies developed. XpertHR are an external organisation who offer dedicated HR support including comprehensive employment law and HR practice guidance.
- HR Team to consult CDC's external HR Advisor, Evelyn Fearon, to discuss changes/suggestions.
- Complete 'in-house' amends

- Consult with the recognised trade unions, GMB and Unison.
- Present to Cabinet for final approval
- Implementation
- Training for management on the core policies and requirements of them, working with HR to ensure risk of employee relations matters mitigated

2.4 Publica HR engaged XpertHR Lawyers, Markel, November 2022, to support in the production of a suite of 26 human resources policies to ensure consistency and transparency across all policies, mitigating employment risks.

2.5 Initial work was completed by March 2023 on a full suite of policies ensuring no employment terms and conditions were altered which conflicted with the Councils existing terms.

2.6 Following consultation with the Chief Executive, Evelyn Fearon external HR consultant was employed to review the core six policies.

2.7 Further amends and alterations to strengthen/clarified points were made to the policies and procedures in conjunction with Evelyn Fearon, the Chief Executive, and Publica's HR team.

2.8 The final, amended policies and procedures were sent to Markel LLP and signed off in August.

2.9 Publica's HR Team met with the Trade Unions to respond to comments made on the suite of 26 human resources policies in August.

3. MAIN POINTS

3.1 The review of the Human Resources (HR) Policies was to ensure that the Council's policies reflected and complied with existing / new regulation and case law, reflected best practice and importantly were clear and concise to allow managers to implement them as and where necessary. Updating all policies together, ensures flow and for policies to be used in conjunction when complex cases arise, ensuring matters are dealt with in a timely fashion and thereby mitigating risk for the Council.

3.2 HR Policies provide legal protection for the Council. HR policies and procedures give guidance on a range of employment issues and are written guidance on how a wide range of issues should be handled.

3.3 HR Policies provide clear guidance that reflects employment law and regulations and can help avoid involvement from employment tribunal claims.

3.4 Even when a policy or procedure is not specifically required by law, employers often find it helpful to have a policy in place to provide clear guidance that reflects the legal framework for handling the issue in question and it also helps employees be clear about the Council's stance on a particular subject, setting clear expectations.

3.5 HR Policies play a key role in supporting fairness and consistency across the Council, as well as potentially helping to protect the Council against legal claims and costly exit payments.

3.6 HR Policies provide general and practical advice and guidance for managers and staff on a range of employment issues and the procedures give a step-by-step account of specific arrangements that apply in particular circumstances.

3.7 Clear Health & Safety policies, which are current and in line with legislation are the backbone to strong safety performance and compliance. These bring a variety of benefits including ensuring a safe working environment and places obligations on employers to meet with their legal obligations.

3.8 Under 'common law' all employers have a duty of care which is an obligation to protect their employees. A term is implied into all employment contracts requiring employers to take care of their employees' health and safety.

3.9 For example, employers must provide a safe place of work, a safe system of work, adequate equipment.

3.10 Employees also have responsibilities and should work with their employer to ensure a safe place of work.

3.11 Health and Safety Policies help to mitigate risks, through early warning and ensuring sufficient precautions are taken to prevent damage or injury, thereby reducing the risk of claims against the Council.

4. DELEGATING AUTHORITY

4.1 Employment legislation and case law can change on a yearly or bi-annual basis. Therefore, in order to maintain a current, up to date, and working set of HR policies, expediting changes to the suite of policies is key to ensure the Council is within the legal framework.

4.2 Overview and Scrutiny Committee requested that a report be made on an annual basis, indicating which policies have been updated in line with changing or updated legislation.

4.3 Regular policy review and revision is an important part of procedure management which needs to be carried out on a regular basis and in line with employment law updates in April and October. The HR team now has Employment Legislation update training on this basis to ensure policies can be amended accordingly.

4.4 To ensure expedience, it is proposed that delegated authority to make reasonable amends be given to the Chief Executive of Cotswold District Council.

5. ALTERNATIVE OPTIONS

5.1 Retaining existing, outdated policies places the Council at risk of challenge.

6. CONCLUSIONS

6.1 Further to the Overview and Scrutiny request that all HR policies are updated - this work has concluded. Publica's HR team was supported by XpertHR, external lawyers and an HR consultant to develop a clean and clear set of policies that mitigate risk for the Council. This suite of policies are up to date and legally compliant.

7. FINANCIAL IMPLICATIONS

7.1 Whilst there are no financial implications arising directly from this report, it is important that the Council's HR policies are reviewed regularly to ensure they comply with relevant legislation and best practice guidance.

8. LEGAL IMPLICATIONS

8.1 Adopting up to date policies will help the Council manage employees more effectively. In addition, if subject to any legal action, will help to demonstrate that the Council has complied with the law.

8.2 The Health & Safety policy statement is written for the activities that are carried out by our staff and incorporates the organisation and arrangements, which are in place to meet the requirements of the legislation. This is in accordance with section 2.3 of the Health and Safety at Work etc. Act 1974.

9. RISK ASSESSMENT

9.1 By not updating and implementing the new suite of policies, the Council may fail to comply with new laws and regulations and leave itself exposed to costly employment law cases.

10. EQUALITIES IMPACT

10.1 Each policy has been considered to ensure compliance with the Equality Act 2010 and the Public Sector Equality Duty. These policies apply equally across the Cotswold DC workforce.

11. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

11.1 There are none arising.

12. BACKGROUND PAPERS

Annex A

(END)

COTSWOLD DISTRICT COUNCIL

CABINET – 12 SEPTEMBER 2023

Employment and Health & Safety Policies

Annex A

HR & Health and Safety Policies

1. Agile Working Policy
2. Anti-harassment and Bullying Policy
3. Compassionate Policy
4. Disciplinary Policy
5. Equality, Diversity and Inclusion Policy
6. Expenses Policy **(no longer being considered)**
7. Flexible Working Policy
8. Flexi-time TOIL and Overtime Policy **(no longer being considered)**
9. Grievance Policy
10. Health & Safety Policy
11. Long Term Sickness Absence Policy
12. Maternity Leave Policy
13. Menopause Policy
14. Parental Bereavement Policy
15. Parental Leave Policy
16. Paternity Leave Policy
17. Performance Improvement (Capability) Policy
18. Probation Policy
19. Redundancy Policy **(no longer being considered)**
20. Reserved Forces and Voluntary Emergency Responders Policy
21. Shared Parental Leave (Adoption) Policy
22. Shared Parental Leave (Birth) Policy
23. Sickness Absence Policy

24. Supporting Bereaved Employees Policy
25. Supporting Employees through Pregnancy Loss Policy
26. Time off for Dependents Policy
27. Unauthorised Absence Policy

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Agile Working Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

This agile working policy builds upon previous flexible working policies and supports a culture of working wherever, whenever and however is most appropriate to get the work done.

Adopting this approach means that desk space is better utilised, with the office plans setting out the new layouts. The new office layout will be more focused on collaborative working and desk space will be shared.

It is important that individuals work with their colleagues and line manager to agree agile working arrangements that meet the needs of both the team and service delivery.

Our approach to agile working also links to our vision to address the climate emergency.

This policy sets out our approach to agile working, which allows employees flexibility between attending the office and working remotely. Agile working is an important element of our:

- Strategy for adapting to, and thriving in the new working environment
- Meeting our climate change commitments
- Commitment to supporting a positive work-life balance for our employees

We wish to support employees to do their best work, have a good work life balance, work flexibly whilst staying connected and getting the job done.

What is Agile Working?

Agile working is about more choice in deciding how, when and where you work best, balancing the needs of CDC, your team and yourself. Where, when and how you choose to work will depend on your role and discussions with your manager.

Key principles of agile working

- We acknowledge that agile working is not suitable for all roles. Each employee should discuss this with their line manager and establish how they work.
- Our Business Conduct policy applies in every location you work from, whether in one of our offices, at home or on site. Please familiarise yourself with this Policy.
- Agile working is open to everyone who has a suitable role regardless of how long they have worked with CDC.
- We commit to providing you with the necessary technology and equipment.
- Community and collaboration are part of who we are and we know they are important for our wellbeing. We will continue to provide safe office spaces for you to collaborate and connect with others.

- There will be times when being on site is important, e.g. when you first start working for us, or when you take on a new role. We would encourage you to visit one of the offices to familiarise yourself with the way we work and the support available.
- Working in this way will not change your contractual terms and conditions of employment in respect of working hours or work location. Agile working is an informal arrangement that may be changed from time to time depending on business needs.
- The expenses you can claim will be un-changed, that is if you claim mileage, you will be required to deduct your normal home to office from your claim even if you go to wherever you are going directly from your home.
- If you want to make a more permanent change to your hours, location, place of work and/or working pattern, you will need to request this separately through the Flexible working policy. (Please note a request under the Flexible Working Policy can only be made every 12 months)

Practical Considerations

The number of days per week each employee spends attending the workplace/office compared with working remotely will vary, depending on:

- Their individual circumstances
- The nature of their role
- What is happening within their role and team at any particular time; and
- The needs of our organisations, including the space we have available at our work locations

We expect that most staff will spend some of their working time in the office and some at home.

CDC recognises the benefits of flexibility but also that for some employees working at home may have its challenges. For example, you might:

- Live a significant distance from the office and it would be more efficient for you to spend more time working remotely or
- Have challenges with your working environment at home that mean that remote working is difficult for you and you would like to attend the office more often

Please speak to your line manager who will be supported by the HR Business Partner, if you think that you would benefit from working more at home or more in the office.

Being Flexible

Given the degree of flexibility that our agile working arrangements provide, we expect our people to be flexible.

You may be required to attend the office on particular days at the request of your line manager/head of department, for example for in-person training and for meetings that your line manager/head of department has determined are best conducted in person.

Similarly, there may be circumstances in which we ask you to work remotely, or to work from such other place as we may reasonably require, when you would otherwise expect to attend the workplace/office, for instance:

- For operational needs, for example if we have too many employees attending the workplace/office on specific days; or
- In the event of a lockdown/government guidance that employees should work from home if they can.

In such cases, you will be given as much notice as possible.

Arrangements while Attending the Office

Workspaces

Each team has a number of desks allocated to them; however it may be that if all the team are in the office at the same time, you may not be able to access a desk in your area. If this is the case, please use a desk in another part of the building. Some teams may decide to work on a rota basis. Please work with your line manager and the rest of your team to ensure you have the necessary desk space.

At the end of each day on which you are attending the office, please ensure that you leave the desk clean and tidy. Your laptop, any other equipment and any personal items should not be left on desks overnight. Please ensure that your laptop and other equipment are either taken with you or secured away.

Health and Safety - Working Measures

The health, safety, wellbeing, and security of our colleagues in all locations is paramount. Please:

- Familiarise yourself with the risk assessment relating to your work and meet the standards required whilst carrying out your work activities
- Familiarise yourself with the Emergency Evacuation Procedure, the First Aid Arrangements and the Accident / Incident reporting procedure for each site you may be working at.
- Complete a DSE (Display Screen Equipment) self-assessment for office and home workstations. A Working from Home Assessment might also need to be completed. Please see DSE guidance on the Health and Safety Support portal page, in the working from home guidance, and ensure you complete the iHasco online training.
- Keep your workstation tidy, ensure personal belongings or computer wires do not present a trip hazard. You should not bring in electrical equipment from home to use at work.
- Work with your team to ensure that you have appropriate lone working arrangements in place.

Let us know if you have any concerns, have identified any potential risks, or have any suggestions for further adaptations we can make. You can do this by raising concerns or making suggestions to your line manager.

You have a role to play in ensuring all our staff can work in a safe environment and you must follow our safe-working instructions. Failure to do so may be a disciplinary offence and dealt with in accordance with our disciplinary procedure. More detailed information can be found in the Health and Safety Support section on the portal.

Arrangements while Working Remotely

Working hours and keeping in touch

We want to empower you to choose the times you work so you can balance your home life and the needs of your role. We trust you to manage your own time and work the hours you are contracted to do.

There are some key areas we would like you to be aware of:

While working remotely, you must be available and working during your normal hours of work. You should agree your normal working hours with your line manager.

You must ensure regular contact with your team / manager using mobile phone, telephones and email. Follow the control measures identified in your risk assessment relating to home and lone working.

We ask you to be mindful that you are not overworking. "Downtime" from work is essential. To help maintain your wellbeing, please make sure that you take adequate rest breaks:

- Take time off for lunch each day.
- Even if you are busy, it is essential that you find the time to take a break of at least 30 minutes during each working day that lasts more than six hours.

Please be as clear as possible with your line manager and colleagues about your hours of work for days on which you are working remotely. Making use of tools such as shared calendars and out-of-office messaging can help colleagues to be aware of your availability on these days.

We may ask you (with enough notice) to be available at certain times to meet the needs of the business, to physically be in the office to collaborate or attend training.

Flexing your working times should not result in extra work for other members of your team.

We know life can be complicated and that working in this way can help you balance your home and work life. However, agile working is not a way of dealing with emergency leave or for long-term childcare if it has an impact on your ability to carry out your day-to-day role.

We know that collaboration, connection and having a sense of belonging are important to your wellbeing. We encourage you to actively make time to connect with your colleagues. To find out what other support is available, please visit the Staff welfare and support page on the CDC Portal.

Sickness

When working remotely, you should not work if you are unwell. If you are sick and unable to work, our Sickness absence policy applies.

You should notify your line manager by telephone or by message as soon as reasonably practicable on the first day of absence, preferably before you are due to start work and, in any event, no later than one hour after you are due to begin work.

Technology and equipment

To assist you to work remotely, you are provided with:

- A laptop computer
- A mouse
- A keyboard
- Any additional equipment required as identified in your Display Screen Equipment (DSE) assessment

You must take care of any equipment we provide you with and notify your line manager/the IT department of any faults with the equipment.

If you need any additional equipment, please speak to your line manager.

You must complete the DSE iHasco online training which will assist you in setting up your workstation correctly.

When working at home you must ensure you have a secure, private and appropriately lit and heated space to work in, with a reliable and secure Internet connection.

Care Commitments

When working at home you will be required to work the hours you are contracted. You should ensure you have the appropriate arrangements in place for childcare or other caring responsibilities, so that you can work undisturbed or distracted by such caring responsibilities. However, if for any reason there are challenges, please discuss any support you may require with your line manager.

Data Protection, Security and Confidentiality

Maintaining the security of information we work with is vital and when we work away from the office we are responsible for the security of the data we have. Please ensure that you know your responsibilities under the Data Protection Act and our security policies.

Please ensure:

- That you do not send work related emails of sensitive data to your home email address
- Do not store work related information on your personal computer
- If you work from a CDC office space, please be mindful of any IT security risk or confidentiality; position your laptop so others cannot see the screen and avoid having sensitive conversations in public
- Other individuals (including family members) should not have access to any work information or personal information either on paper or as electronic records.

Working Elsewhere

At times there may be a request to work outside the UK. There are significant legal and logistical issues with allowing staff to work abroad for weeks at a time. These include tax, employment law and data protection. For this reason, we are unable to support long term arrangements or requests for permanent relocations outside the UK. Please discuss any requests with your line managers and your HR Business Partner.

Costs and Expenses

Your contractual normal location of work will not change, so that your entitlement to claim expenses will remain the same. Please see our Expenses policy.

Employees may be able to claim tax relief for any household expenses incurred as a result of working from home, provided the expenses are solely work related. If you wish to benefit from this tax relief, see the Government's '*Claim tax relief for your job'* expenses guide (link).

Appendix

Requesting Flexible Working

This Policy focuses on how our organisation operates agile working, but there are many other forms of flexible working.

If you have 26 weeks' service with us, you retain the right to make a formal request for flexible working, whether or not agile working is available for your role/in your team.

Examples of other types of flexible working that can be requested are:

- Reducing the number of hours that you are working
- Changing your start and finish times
- Compressing your working hours into fewer days (for example moving to a nine-day fortnight)

If you would like to request another form of flexible working, or if we do not currently offer you agile working but you would like to request it, you can make a formal request under our Flexible Working Policy.

Version Control:	
Document Name:	Agile Working Policy

Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Anti-Harassment and Bullying Policy and Procedure

Introduction

Cotswold District Council (CDC) prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. CDC has a strong commitment to equality, diversity, and inclusion.

Employees are an organisation's most valued asset and as such we seek to ensure that all our policies and procedures reflect the very best in good practice. Everyone should be treated with respect and dignity, creating an environment where employees can deliver their best in a culture free of bullying or harassment. Having a culture that is diverse, equitable and inclusive is core to everything that we strive to achieve and to the organisational environment we wish to protect.

We will not tolerate any instances of bullying or harassment, victimisation, or discrimination at CDC, with all forms being dealt with effectively. Harassment and bullying can have very serious consequences for individuals and may cause stress, affect their health, impact their families and social relationships, as well as affecting their ability to perform their role and progress their careers. For organisations the impact can be low morale, poor work performance, high attrition and damage to the organisation's reputation. Therefore, any employee who is found to have harassed or bullied a colleague or stakeholder could face disciplinary penalties up to and including dismissal. Victimisation of a person making allegations of harassment and bullying is a disciplinary offence.

Key to protecting an inclusive and positive culture is seeking to eradicate bullying, harassment, victimisation, and discrimination at work. This policy and procedure support this aim by setting out the steps that will be taken to investigate and deal with complaints of bullying or harassment, and how we support those affected, as no one should have to suffer bullying or harassment in the workplace.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

Scope

This policy applies to anyone working for Cotswold District Council. This includes employees, contractors, volunteers, interns, and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship. The policy also applies to bullying or harassment by third parties.

Our Commitment to You

We believe that a culture of equality, diversity and inclusion not only benefits our organisation and Partner Councils but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.

We are committed to promoting a working environment based on dignity, trust and respect, free from discrimination, harassment, bullying or victimisation.

A toxic workplace culture, where bullying or harassment is tolerated, is harmful to the wellbeing of the workforce as well as the wider organisation.

We adopt a zero-tolerance approach to instances of bullying or harassment. Our commitment to you is to ensure that all forms of harassment, bullying, and victimisation are dealt with effectively.

What we expect From You

We expect you, and every one of our people, to take personal responsibility for observing, upholding, promoting, and applying this policy. Whatever your job is, this is part of your role.

Any dealings you have with third parties, including customers, suppliers, contractors, agency staff and consultants, must be free from discrimination, harassment, victimisation or bullying.

If anyone in the employ of CDC is found to have committed, authorised, or condoned an act of bullying or harassment, we will take action against them (for those to whom it applies) under our Disciplinary Procedure up to and including dismissal.

There is no justifiable reason to bully or harass anyone. For example, observing a particular religion is not a legitimate reason for bullying or harassing a colleague, neither is their sexual orientation. Even if you do not intend to bully or harass anyone, this does not legitimise your behaviour as it is the impact on the recipient that is important.

You should be aware that you can be personally liable for harassment.

If you experience bullying or harassment, we encourage you to speak up without delay and to ask for appropriate support.

Who is Protected from Harassment?

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These include:

- disability
- sex
- gender reassignment
- race
- religion or belief
- sexual orientation
- age
- pregnancy and maternity
- Marriage and civil partnership

As well as the protected characteristics covered above, we consider harassment on any ground to be unacceptable.

Meaning of Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Harassment can occur where someone perceives another person to have a protected characteristic, for example a perception that someone is transgender even if they are not.

Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic, for example having a family member of a particular religion.

Examples of harassment

Harassment can occur in many forms and can take place either at work or outside work. While this is not an exhaustive list, examples include:

- "banter", jokes, taunts or insults that are sexist, racist, ageist, transphobic, homophobic or derogatory against any other protected characteristic
- unwanted physical behaviour, for example, pushing or grabbing
- excluding someone from a conversation or a social event or marginalising them from the group
- derogatory comments about pregnancy, maternity leave or IVF treatment
- mimicking or making fun of someone's disability
- derogatory or offensive comments about religion
- unwelcome comments about someone's appearance or the way they dress that is related to a protected characteristic
- "outing" (i.e., revealing their sexual orientation against their wishes), or threatening to "out", someone
- consistently using the wrong names and pronouns following the transition of a person's gender identity
- displaying images that are racially offensive
- excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.

Harassment can arise where the perpetrator did not have the intention of causing offence but does cause offence by what they say. For example, this can happen in respect of banter and jokes.

Meaning of Sexual Harassment

Harassment may be sexual in nature. The law defines sexual harassment as:

- conduct, including verbal, comments, of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Examples of sexual harassment

Sexual harassment can occur in many forms. While this is not an exhaustive list, examples include:

- physical conduct of a sexual nature, unwelcome physical contact, or intimidation
- persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions
- showing or sending offensive or pornographic material by any means (e.g., by text, video clip, email or by posting on the internet or social media)
- unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults
- offensive comments about appearance or dress, innuendo, or lewd comments
- leering, whistling, or making sexually suggestive gestures and
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

Bullying

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent in nature, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

Examples of bullying

While this is not an exhaustive list, bullying may include:

- physical, verbal or psychological threats
- excessive levels of supervision
- spreading rumours, malicious or offensive
- constantly putting someone down, undermining, criticising, showing a lack of respect and
- inappropriate and derogatory remarks about a person's performance.

It is important to understand that legitimate, reasonable and constructive criticism of a person's performance or behaviour, or reasonable instructions given to people in the course of their employment, will not of themselves amount to harassment or bullying. **Micro-aggressions**

Micro aggressions - sometimes called micro-incivilities - are statements, actions, or incidents that are regarded as indirect, subtle, or unintentional discrimination against members of a marginalised group such as a racial or ethnic minority. They are sometimes referred to as "death by a thousand cuts". Micro-aggressions generally take one of three forms:

- **Micro-assaults:** Conscious and obvious insults made verbally or non-verbally to a marginalised individual or group, for example directing limp-wristed hand gestures towards a gay colleague and saying, "It's just a joke".
- **Micro-insults:** Unintentionally insensitive remarks or assumptions based on stereotypes, for example saying to a person with a disability "You don't look disabled to me".
- **Micro-invalidations:** Where a person denies, or seeks to cancel, the feelings and lived experiences of a marginalised individual or group, for example a white person saying, "I don't think the UK has a problem with racism - some people are just too sensitive".

Serious micro-aggressions can amount to unlawful harassment, bullying or discrimination but even less serious micro-aggressions can negatively impact the health and wellbeing of the person experiencing them.

What to do if you are being Bullied or Harassed

Informal route

Bully/harasser is a colleague

If you feel able to, and where you believe there is a reasonable prospect of resolution, you may decide to raise the issue with the individual themselves, to make clear that their behaviour is not welcome and to ask them to stop. They may not be aware that their behaviour is offending you or it may be unintentional on their part.

Alternatively, if you do not feel up to speaking directly to the individual, you may consider asking your line manager, or an alternative manager for support. If the individual causing offence is your line manager or a someone senior in the work structure, you may wish to speak with Human Resources for further guidance.

You may or may not want them to talk to the individual on your behalf and, where possible, we will respect your wishes. However, if the welfare or safety of you or others is at risk or where your allegations are particularly serious, we may have to approach the individual and instigate a formal investigation. In such a case we will, where possible, discuss this with you first.

Mediation is a voluntary and confidential process and if you do not wish to take part in mediation, you do not have to. The mediator will be impartial, neutral and fully trained to conduct mediation whether they be an internal or an external resource. Mediation can help to mend workplace relationships by: -

- Finding solutions that everyone agrees to.
- Improving communication.
- Allowing everyone involved to have control of what is finally agreed.

Mediation can be used at any stage in a disagreement but the earlier the disagreement is dealt with, the less chance there is of things becoming more difficult and entrenched.

Bully/harasser is a third party

If you are experiencing bullying or harassment by a third party, for example a client or a supplier, we encourage you to report this to your line manager without delay so that they can consider what action it may be possible to take or how you should respond taking account of the fact this is a third party.

Formal route

If you are not happy with the outcome of an informal process, or if you feel it is not appropriate to approach the issue informally, you may decide to raise your complaint formally.

To make a formal complaint, you should discuss this first with your line manager. If your complaint is about your line manager, you should raise this with another appropriate manager. If you have any queries you should refer to your HR Business Partner. Under the formal procedure within this policy,

- We will usually ask you to set out your complaint in writing or via email. Please include as much detail as possible, for example:
  - the alleged bully/harasser's name
  - the nature of the bullying/harassment
  - the dates of the alleged acts of bullying/harassment
  - names of any witnesses
  - and details of any action taken to address the matter so far;
  - any other information that you feel is directly relevant
- you may be asked to discuss this in more detail with the investigating officer
- you can expect the matter to be investigated, which may include meeting with the alleged bully/harasser to ascertain their response to the allegations. It may also include interviewing potential witnesses who we will instruct to keep the matter confidential
- expect the manager chairing the matter to carry out further investigations of the complaint where necessary
- invite you to a meeting to discuss your complaint in full. You will have the right to be accompanied by a colleague or trade union representative
- hold a meeting with you to enable us to ask you further questions in light of any information we have gathered from the alleged bully/harasser and/or witnesses
- the chair will consider all the evidence in full and make a decision and

- inform you of the decision (this will normally be in person without unreasonable delay) and, if we uphold the complaint, instigate disciplinary action up to and including dismissal against the bully/harasser. You will be notified of the timescales involved and any decision will be confirmed to you in writing.

We will investigate fully every formal complaint in an objective and confidential way, ensuring that we respect your rights as well as the rights of the alleged bully/harasser. You are of course welcome to be accompanied by a work colleague or Trade Union Representative to any investigatory meetings held.

We will use every effort to complete an investigation into bullying or harassment as quickly as possible.

Where the alleged bully/harasser is a third party, we may need to adjust the procedure under this policy to ensure we conduct appropriate investigations and we will discuss this with you.

Right to Representation

At any formal meeting you have the right to be represented by a work colleague or a Trade Union representative. However, consideration will be given to another person in exceptional circumstances.

Appeals

If you are not satisfied with the outcome of the formal hearing, you have the right to appeal.

Should you wish to appeal, you should write to the Manager referenced in the outcome letter setting out what aspects of the decision you are unhappy with and the reasons why. Appeals should be submitted without unreasonable delay and usually no longer than five working days after we inform you of the decision.

The manager or delegated person will arrange a meeting with you to discuss your appeal in full and to try and reach a satisfactory solution. You must take all reasonable steps to attend this meeting and you may be accompanied by a colleague or trade union representative. If you cannot attend for a genuine reason the matter will normally be rescheduled at least one time (thereafter it may be held in your absence).

The manager or delegated person will write to you to confirm the outcome of the appeal, which will be final.

Support for those Affected or Involved

We understand that anyone affected by, or involved with, a complaint of bullying or harassment may feel anxious or upset and we will do what we can to support you.

If you feel you cannot continue to work in close contact with the alleged bully/harasser, we will seriously consider any requested changes to your working arrangements during our investigation into the matter.

Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. We take such matters very seriously, if you feel you have suffered any victimisation, please inform your line manager as soon as possible. Equally, making malicious, vexatious or false allegations will not be tolerated and is a disciplinary offence.

Regardless of the outcome of your complaint, we will consider carefully how to best approach any ongoing working relationship between you and the individual concerned. For example, depending on the specific circumstances, it may be possible to consider amending the job duties, location or reporting lines of either you or the other person. For example, where the roles in question mean that this is possible to manage

without disrupting the work. Alternatively, we may propose that workplace mediation or counselling is appropriate if this can be agreed voluntarily by the parties.

Sensitivity and Confidentiality

Anyone involved with an informal or formal complaint about bullying or harassment, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties.

If you are found to have breached confidentiality or acted without due care or sensitivity in a case of bullying or harassment, we may take disciplinary action against you up to and including dismissal (or other appropriate action for non-employees).

Consequences of Breaching this Policy

If, following a formal investigation, we find that you have committed, authorised or condoned an act of bullying or harassment, we will deal with the issue as a possible case of misconduct or gross misconduct.

We may take disciplinary action against you, up to and including dismissal (or other appropriate action for non-employees).

Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If we find that you have victimised anyone in this way, we will instigate disciplinary action against you up to and including dismissal (or other appropriate action for non-employees).

We will also offer support for all those affected as we seek to encourage a positive work environment free of harassment and bullying where employees are confident to speak out and use this policy should it ever be required.

Version Control:	
Document Name:	Anti-Harassment and Bullying Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

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COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Compassionate Leave Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

At CDC, we provide compassionate leave to help employees to come to terms with the death of a loved one, a serious illness or injury involving a loved one, or serious personal relationship problems.

We also have separate policies to cover parental bereavement leave, supporting employees experiencing pregnancy loss and the statutory right to take time off for dependants, where you may have an emergency situation to deal with. This policy does not affect employees' statutory right to take time off for dependants or parental bereavement leave. Unless there is an overlap with this clause, any time off granted as compassionate leave is in addition to the time off available under the statutory right.

Definitions

Immediate family member: In this policy, immediate family is defined as the employee's spouse, civil partner, partner, parent, child, sibling, grandparent or grandchild.

Dependant: In this policy, dependant is defined as the employee's spouse, civil partner, child or parent, and any person who lives at the same house as the employee (other than as a lodger, tenant, boarder or employee) or who would reasonably rely on the employee for assistance or arrangements for care in the event of illness or injury.

Bereavement

In the event of the death of an immediate family member, the employee will be granted up to 5 days' paid leave in any 12-month period. Each case will be viewed sympathetically, and the amount of leave granted will depend on the individual's circumstances. The line manager will consider matters such as the employee's relationship with the deceased, domestic responsibilities and travel requirements.

In the case of the death of another close relative, for example an aunt, uncle, cousin or parent-in-law, or a close friend, the employee may be granted leave to attend the funeral.

The employee should inform their line manager of the need to take compassionate leave as soon as reasonably practicable or, at the latest, on the first day on which they are absent.

If the employee wishes to take further leave, they should request annual leave in the usual way

Other Circumstances where Compassionate Leave is Available

Compassionate leave is available to take care of a dependant or to come to terms with a critical illness or injury of an immediate family member or serious personal relationship problems.

Employees in these circumstances may be granted up to 5 days paid compassionate leave as a one-off period. Each case will be viewed sympathetically, and the amount of leave granted will depend on the employee's circumstances. The line manager will take into account factors such as the nature of the incident and, if applicable, the closeness of the relationship.

The employee should inform their line manager of the need to take compassionate leave as soon as reasonably practicable or, at the latest, on the first day that they are absent.

If the employee wishes to take further leave, they should request annual leave in the usual way.

Version Control:	
Document Name:	Compassionate Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Disciplinary Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return, we seek to support our workforce by ensuring they always have a positive and pleasant working environment, where all employees are treated fairly and consistently.

Valuing our workforce ensures having policies and procedures in place to manage any behaviours that do not reflect our vision and values and the high standards we set, ensuring any issues are managed promptly and reasonably.

This policy outlines the disciplinary procedure, the roles of those involved and the support that is available. This policy also covers issues relating to poor attendance and timekeeping.

If we have any concerns about your conduct, we will usually attempt to talk to you about this on an informal basis. An early conversation may be enough to identify the issue and take steps to resolve it. Most minor conduct-related issues can be resolved informally.

However, where an informal approach is unsuccessful, or the allegations are so serious that an informal approach is inappropriate, we will follow a formal disciplinary procedure.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

Scope

This policy applies to employees of CDC, other than the Chief Executive and the statutory officers for whom separate arrangements exist as detailed in their contract of employment. It does not apply to contractors, consultants or any self-employed individuals working for CDC.

Grievances

If you have a grievance that relates to ongoing disciplinary proceedings, you should raise this during the disciplinary procedure with reference to the grievance procedure (for example during the disciplinary hearing or appeal stage). The reason for this is so that the grievance can be addressed in the context of the relevant disciplinary proceedings to which it is related and so that any correction which is applicable can be made quickly and with the least disruption.

Where an employee raises a grievance during a disciplinary process the disciplinary process may be temporarily suspended in order to deal with the grievance. Where the grievance and disciplinary cases are related it may be appropriate to deal with both issues concurrently. Add hyperlink

If you raise a grievance during disciplinary proceedings that is unrelated to those proceedings, the disciplinary proceedings and grievance procedure could continue to run independently.

We recognise that a disciplinary procedure can be stressful and upsetting. Everyone involved in the process is entitled to be treated calmly and with respect.

We will not tolerate abusive or insulting behaviour from anyone taking part in a disciplinary procedure and treat any such behaviour as further potential misconduct. Making malicious, vexatious, or false allegations will not be tolerated and is a disciplinary offence.

Remote proceedings

Where it is not possible to hold a face-to-face meeting under this procedure (for example in respect of incapacity or practical difficulties in holding the hearing or as a reasonable adjustment), we will conduct the process remotely. We will ensure that you and your representative have access to the necessary technology for participating. Your rights will not be affected, and we will ensure that the procedure remains fair and reasonable.

Right to Representation

At any formal meeting you have the right to be represented by a work colleague or a Trade Union representative. However, consideration will be given to another person in exceptional circumstances.

Adjustments to proceedings

If you have a disability that may have an impact on your ability to participate fully in this procedure, or if you need assistance because English is not your first language, you should let us know by contacting the relevant person holding the meeting, who will make appropriate arrangements for you. ED&I hyperlink – extend it to reflect the wider EDI statement – not reflective of current EDI

Recording of meetings and hearings

For the avoidance of doubt and for the benefit of all parties, the process will include the digital recording/tape recording of investigatory meetings and hearings where this is agreed by all parties The record of the meeting, whether written or digital, will be shared with you. The recording of interviews and hearings facilitate full and more accurate records for the investigating officer as well as for the interviewee(s) and, in the case of hearings, the panel members. It is intended to use the facility of recording only for the transcribing of interviews being conducted as part of a formal investigation and, where appropriate, subsequent hearings. This is to aid in the production of accurate records of interviews and hearings. Recording can be suspended at the request of either party for a break in the interview/hearing.

You will be informed that investigatory interview or hearings will be digitally recorded when arrangements are made to set up the meeting if this will be case. Once the equipment is set up for use, a check will be made to test that it is fully functional. At the start of any interview or hearing the date, time and location will be recorded. All parties present will be asked to introduce themselves to enable later voice identification. Once the recording for the investigatory meetings have been transcribed, the transcript will be forwarded to you and if there is a concern regarding accuracy of the transcribing you will be given the option to listen to the recording. Recordings of interviews will be held securely until the conclusion of the investigation and subsequent hearing if required. The recording produced as part of an investigation will not go forward to a hearing; the transcript will be used.

If the matter under investigation is also a possible criminal offence the council reserves the right for the investigatory interview to be an interview under caution, to protect your legal rights and also to protect the integrity of any further criminal investigation.

You, or any person acting on your behalf, are not permitted to record electronically any meeting that we hold under this procedure. This is to encourage openness and full participation. Any breach of this provision may lead to further disciplinary action, which could include dismissal.

In certain limited circumstances, we may permit or arrange for a meeting to be recorded electronically, for example where it is a reasonable adjustment for an employee with a disability. Where we permit or arrange for a meeting to be recorded electronically, we will take responsibility for making the recording.

Where we intend to record meetings held remotely, we will comply with our data protection obligations and obtain prior consent from all attendees.

Change of circumstances

Sometimes circumstances prevent parts of this procedure from being followed in full. For example, employees may be too ill to participate in a disciplinary hearing (if one is required) or a specified line manager may be unavailable to chair the hearing. When this happens, we will do our best to ensure that you fully understand the proceedings so that your response is fairly and carefully considered at the Hearing.

In the case of an investigatory interview then we will always seek to start by rearranging the interview in the first instance where it cannot be attended through an employee being too ill to participate. When this happens, we will do our best to ensure that you fully understand the allegations and are given a proper opportunity to respond to them.

Postponement of meetings

We will make every effort to ensure that any meeting we hold under this procedure is scheduled for a time and place that is reasonable and within your normal working hours. You are therefore required to attend the meeting if it is possible for you to do so. If you are unable to attend, then we will normally reschedule the meeting once to a new time when your attendance should reasonably be possible.

However, it is important to ensure that disciplinary procedures are completed within a reasonable timescale. We reserve the right to proceed with a meeting in your absence when it has not been possible to arrange a meeting that you are able to attend. In that case, we will make every effort to ensure that you are able to make representations in writing or through a representative.

Employees may bring either a work colleague or a Trade Union representative to a hearing and something we allow for fact finding investigation meetings. Please note there is no right to legal representation for internal meetings. If your work colleague or Trade Union representative is not available to attend the meeting, we will agree to postpone and seek to agree a mutually convenient time. However, any such postponement must be short, and we reserve the right to proceed with the original meeting if no new date can be found that is within five working days of the scheduled date.

Conduct and behaviour

Gross misconduct

Gross misconduct is conduct that is so serious that it justifies dismissal without notice or payment in lieu of notice, although we will always consider the circumstances of any case before deciding on the appropriate penalty.

Examples of gross misconduct include (but are not limited to):

- theft and dishonesty
- fraud and corruption
- physical violence
- serious instances of bullying or harassment (whether it takes place in person or online)
- acts of discrimination against fellow staff members, clients or customers
- deliberate damage to company property

- any conduct that negatively affects our reputation
- unauthorised disclosure of confidential information
- serious breach of our rules, including, but not restricted to, health and safety rules and rules on computer use
- consuming alcohol or unlawful drugs during working hours or in the workplace
- smoking (including the use of e-cigarettes) in any unauthorised area
- unauthorised use of computer equipment
- misuse of company passwords or log-in details
- deliberate breach of procedures on the handling of personal data
- deliberate refusal to follow reasonable instructions
- accessing obscene or pornographic material while at work or on equipment that we provide
- breach of cash-handling procedures
- breach of requirements relating to safeguarding of children or vulnerable adults
- deliberate breach of professional standards relevant to your employment and
- offering or accepting a bribe within the meaning of the Bribery Act 2010.

Misconduct

Examples of misconduct for which disciplinary action is appropriate include (but are not limited to):

- persistent poor timekeeping
- breach of our absence reporting procedures
- general disobedience
- careless work
- time-wasting
- disruptive behaviour and
- insulting or offensive behaviour towards others, not amounting to serious harassment or bullying.

Where any actions constitute possible criminal offences, a referral will be made to the appropriate body or organisation for investigation and any criminal investigation may be conducted concurrently.

In some circumstances, other agencies may also be involved in parallel investigations. In situations where the allegations raise safeguarding concerns, these will be referred to the lead safeguarding officer for the council (or their deputy) and may then be referred to the adult safeguarding team (for allegations relating to adults) or the local authority designated officer in the county council (for allegations relating to children).

Where the allegations relate to suspected criminal offences including fraud, theft or corruption, HR will liaise with the Counter Fraud and Enforcement Unit. In such circumstances, a joint investigation may be necessary.

Where the police, counter fraud and enforcement or the county safeguarding teams may also be investigating, the council will liaise with these bodies to ensure that the council investigation does not jeopardise any criminal investigation. Wherever possible, the council will progress its internal investigation alongside any other external investigation

Actions outside work

We may consider your actions outside work (including your use of social media) to be gross misconduct, or misconduct, if they affect your ability to carry out your job or have a negative effect on our reputation.

Procedure

Allegations of Gross Misconduct / Misconduct

Where an allegation is made against you that cannot be resolved informally, or it is not appropriate to do so, the allegation will be explained to you by your line manager (or, where appropriate, a different line manager). The details of the allegation will also be confirmed to you in writing, together with a copy of this disciplinary procedure.

Suspension

On occasions it may be necessary to consider suspending an employee (on full basic pay) from duty, assign the employee to amended duties, or temporarily redeploy them to an alternative work base or role during the course of the investigation process.

The decision to suspend an employee will be made by management and will only be considered where:

- there is a serious allegation of misconduct and working relationships have severely broken down
- the employee could tamper with evidence, influence witnesses and/or sway the investigation into the allegation
- there is a risk to other employees, property or customers
- the employee is the subject of criminal proceedings which may affect whether they can do their job.

Suspension will also be considered in other circumstances if it is reasonably believed that the suspension of the employee will enable a fair investigation to be completed.

Suspension is in no way intended to indicate guilt on your part, but is an administrative measure designed to protect the business or ensure the smooth running of the disciplinary procedure. Any period of suspension will be regularly reviewed, kept as short as possible and will be on a fully paid basis.

Stage 1 - Investigation

We will investigate the allegations to decide whether there is sufficient evidence to justify taking the matter further.

An appropriate person, who may be an external independent investigator, will be appointed to conduct the investigation and will talk to you at an early stage to hear your response to the allegations and will talk to anyone else who may have relevant information such as the line manager, colleagues and witnesses to the event being investigated etc.

Where appropriate, the investigation may also include the examination of documents, including emails and other forms of electronic communication and you are invited to bring or any relevant documents to the meeting (or send the documentation afterwards) as the purpose of the investigation is to establish the facts so that a decision can be made about any disciplinary action and whether or not an act of misconduct has been committed. It is important that you cooperate fully with the investigation process as this is the best way to ensure a fair outcome.

Once the investigation is complete, management will decide whether to proceed to a formal disciplinary hearing or whether the matter can, in fact, be resolved informally or without any further action.

Stage 2 - Disciplinary Hearing

Invitation to a disciplinary hearing

If we consider that it is necessary to hold a disciplinary hearing, we will confirm this to you in writing. You will usually be given at least five days' notice of any hearing, depending on the complexity of the case, to allow you to prepare and to arrange for a work colleague or Trade Union representative to accompany you.

You will be entitled to be accompanied by a fellow employee or a trade union representative. The responsibility for finding a work colleague or Trade Union representative rests with you. If your chosen work colleague or Trade Union representative is not a fellow employee, we reserve the right to check their credentials as an accredited trade union representative.

We will give you a copy of any evidence/investigation report collated during the investigation in advance of the disciplinary hearing, and you will be invited to submit any further evidence that you consider to be relevant.

The disciplinary hearing

The disciplinary hearing will be conducted by the chair. Details of the chair will be given in the invite letter.

The evidence gathered during the investigation will be presented at the Disciplinary Hearing by the Investigating Officer or a Manager and you and your work colleague or Trade Union representative will be given an opportunity to confer and to respond. You may also let us know if you are seeking to call on witnesses to give evidence on your behalf if it is relevant to the issues being considered to the meeting.

The chair of the disciplinary hearing may choose to adjourn the meeting so that further evidence can be obtained. If this happens, the hearing will be reconvened once this is done, and you will be given an opportunity to respond to any new evidence. Before the hearing closes, you (or your work colleague or Trade Union representative) will be given an opportunity to make a closing statement. Once closing statement are made, no further comments will be accepted.

The outcome

The chair of the hearing will usually adjourn for a period to consider the outcome. The outcome will usually be communicated when the hearing is reconvened but will, in any case, be confirmed to you in writing as soon as possible and usually within seven working days after the hearing.

Disciplinary penalties

If the allegations are upheld to any extent, formal disciplinary action may be taken. This will usually take the form of a first written warning for a first offence. However, we reserve the right to implement this procedure at any stage depending on the circumstances and misconduct.

A first written warning is appropriate for instances of misconduct that are sufficiently serious to warrant disciplinary action, but where there is no current warning in place. The warning will set out the nature of the misconduct and explain that any further misconduct (similar or otherwise) will be likely to result in further disciplinary action.

A final written warning is given in cases of serious misconduct or where there is a live first written warning in place and the circumstances justify it. It will set out the nature of the misconduct and make it clear that any further misconduct (similar or otherwise) will be likely to result in dismissal.

There may be some cases where it is appropriate to give you a final written warning as a first sanction in consideration of the seriousness of the offence (this could be an alternative to dismissal in a potential gross misconduct situation).

If you are found to have committed misconduct while subject to a live final written warning, the outcome may be that you are dismissed with notice.

If you are found to have committed gross misconduct, the outcome may result in you being dismissed without notice as a summary dismissal. In these circumstances, your contract of employment will end immediately, although this will not affect your right of appeal.

In exceptional circumstances (for instances where you are likely to continue to commit misconduct even if subject to warning), you may be summarily dismissed even if no warning of dismissal has been given. Depending on the terms of your contract, this may involve being given a payment in lieu of notice.

If you are dismissed with notice, we reserve the right to instruct you not to work for the duration of your notice period. This may include a payment in lieu of notice, garden leave and you being asked to take your holiday.

Stage 3 - Appeal

Appealing against the outcome

If you consider the disciplinary process and/or outcome are unfair you are entitled to appeal.

You should appeal in writing to an appropriate line manager or senior manager within five working days of receipt of the disciplinary outcome letter.

You should also set out in writing the grounds on which you believe the outcome of the original hearing to have been unfair or flawed and why you feel it to be flawed.

Appeal hearing

Following receipt of your appeal, we will arrange an appeal hearing within five working days. However, if this is not possible, you will be informed of the reason for any delay.

You are entitled to be accompanied at the appeal hearing by a fellow employee or a trade union representative.

The appeal meeting will be conducted by a senior employee or another delegated person who will consider the grounds that you have put forward and review the conclusion reached in the original disciplinary hearing.

At the hearing you will be given the opportunity to explain why you feel the initial hearing reached the wrong conclusion.

Outcome of appeal

Following the appeal hearing, the relevant line manager will inform you in writing, usually within seven working days, of the outcome. The outcome may result in the original decision being upheld, the original decision being overturned, or a lesser sanction. The appeal will not result in the sanction being increased.

If the result of the appeal is that a decision to dismiss you is overturned, you will be reinstated with immediate effect. You will be reimbursed in full for any wages lost since your dismissal.

The outcome of the appeal is final.

Duration of warnings

When you are given a warning, we will tell you how long it will remain live. This will depend on the specific circumstances. However, in general:

- a first written warning remains live for up to six months and
- a final written warning remains live for twelve months.

Warnings may be live for a longer period depending on the seriousness of the misconduct and the wider circumstances of the case.

Once a warning has expired, it will no longer be considered when determining the level of any further disciplinary action.

Trade union representatives

If you are an accredited representative of a recognised trade union, we will endeavour to take no action under this procedure (except for suspending you in a case of alleged gross misconduct) until we have had an opportunity (with your agreement) to discuss the matter with a full-time official of the union.

Version Control:	
Document Name:	Disciplinary Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Equality, Diversity and Inclusion Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference.

At CDC we want to treat people fairly, value differences and remove all the barriers to preventing our people from fully participating in public life. We all have different backgrounds, strengths, personal characteristics, perspectives, and attributes that when harnessed and used collaboratively, are incredibly powerful. An inclusive and diverse culture helps each of us to benefit from a wider range of these different perspectives, experiences, and skills, creating opportunities and reducing the barriers for everyone. Our aim is to create an inclusive and diverse workforce, however creating an inclusive and diverse culture, with equality for all, is a process of continuous improvement, we never stop learning!

To support this inclusive culture, this policy:

- outlines our commitment throughout the employment lifecycle to equality, diversity and inclusion and sets out how we put this commitment into practice
- explains the behaviours we expect of our people in support of this commitment and
- sets out the key steps we take to make our culture as inclusive as possible, and how we ensure equality of opportunity throughout the employment lifecycle.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

Scope

This policy applies to anyone working for us. This includes employees, contractors, volunteers, interns and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

Our Commitment to You

We believe that a culture of equality, diversity and inclusion not only benefits our organisation but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation.

We ensure that our recruitment, promotion and retention procedures do not treat people less favourably because of their:

- disability
- gender, gender identity or gender reassignment status

- marital status
- race, racial group, ethnic or national origin, or nationality
- religion or belief
- sexual orientation
- age
- civil partnership status
- pregnancy or maternity
- paternity
- educational background
- socio-economic background
- caring responsibilities
- part-time status or
- fixed-term status.

What we Expect from You

We expect you, and every one of our people, to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.

Developing this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others. And the more areas of difference a person brings, the more this effect can be compounded. In this way, the experiences of a black woman with a disability may be very different to the experiences of a black woman without a disability and also very different from the experiences of a white woman. This way of looking at diversity and inclusion is known as "intersectionality".

We expect you to treat your colleagues and third parties (including customers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust, and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.

By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

Any dealings that you have with colleagues, or third parties must be free from any form of discrimination, harassment, victimisation or bullying.

If any of our people is found to have committed, authorised, or condoned an act of discrimination, harassment, victimisation, or bullying, we will take action against them including (for those to whom it applies) under our Disciplinary procedure.

We are liable for discrimination and harassment as an organisation, and you should be aware that you can also be personally liable for discrimination and harassment.

Discrimination

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability
- sex
- gender reassignment
- marital or civil partnership status
- race

- religion or belief
- sexual orientation
- age and
- pregnancy or maternity.

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception under the Equality Act 2010.

There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments" under the Equality Act 2010.

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals
- recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients and
- using different standards for different groups of employees to judge performance.

Different Types of Discrimination under the Equality Act 2010

- **Direct discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled and you think they "wouldn't fit in" to the team).
- **Indirect discrimination:** Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.
- **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.
- **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:
    - dismissing or failing to pay a bonus to someone because of their disability-related absence or
    - disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.
- **Failing to make reasonable adjustments:** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:
    - allocating some of the disabled person's duties to a colleague
    - changing their working hours or place of work
    - adjusting procedures for assessing job candidates and
    - modifying Disciplinary and Grievance procedures.

Harassment and Sexual Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Sexual harassment is:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Victimisation

Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

Bullying

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating, or injuring the recipient.

Bullying can be physical, verbal, or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

More information around Harassment & Bullying can be found in the attached policy INSERT HYPERLINK

Equality of Opportunity

Recruitment

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible.

We will ensure anyone making a decision about recruitment does not discriminate in any way and has attended appropriate training.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias, or prejudice do not play any part in recruitment decisions. For example, question and check the basis of your decisions and ensure that you are making a decision on an objective criterion for the role.

Please refer to the Recruitment policy for more information. HYPERLINK

Disability Inclusion

Recruiting people with a disability

The recruitment team and our HR Team will consider disability in advance of a recruitment campaign so that advertising, application forms and assessments, arrangements for interviews, job descriptions and employee specifications, and selection criteria are appropriate and as inclusive as possible.

We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process. These may include ensuring easy access to the premises for an interview/adapting psychometric tests/replacing psychometric tests with an alternative option/providing an alternative to a telephone interview for a deaf candidate/providing a suitable chair for an interview with a candidate suffering from back problems/list other relevant examples.

If you are involved in the interview process, you must not ask job applicants about their health or disability. If you have any concerns, please seek advice from your HR Business Partner. Such approval is given only in exceptional circumstances and where there are specific legal grounds for doing so.

Talking about Disability

We understand that some people find it hard to discuss their disabilities and that disability can be invisible.

Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring disability inclusion.

However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

We do not tolerate ableist language in our organisation. Ableist language is language that is negative, inappropriate or offensive towards people with a disability and may take the form of jokes or "banter". If you adopt such language, we will take action against you including (where applicable) under our Disciplinary Procedure.

Reasonable adjustments

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties at work because of your disability, please contact your line manager to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you and your medical adviser to help us get the right support in place. You will have a documented framework of the agreed reasonable adjustments, which will be reviewed on a regular basis, but will remain in situ for the duration of employment.

For colleagues who are returning from long-term disability-related absence, we have a return-to-work support programme in place.

Support

If you have a disability, or you care for someone with a disability, and need emotional support or help with practical issues, please contact your line manager in the first instance. You can also seek support & advice by contacting HR or your Trade Union representative.

Training

All staff must attend the mandatory training provided for the whole workforce via iHasco, our online training portal. If you are involved with making decisions about a person's employment, you must attend appropriate equality, diversity, and inclusion (EDI) training. All managers are required to attend EDI training.

All new starters must attend equality, diversity, and inclusion (EDI) training as part of their onboarding programme.

Every current employee must attend regular equality, diversity, and inclusion (EDI) training on at least an annual basis.

Monitoring and review

We analyse diversity and inclusion data (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our equality, diversity, and inclusion strategy. We would look to address any issues identified by this data.

You are also responsible for ensuring the data we hold for you is correct, please take the time to regularly check your business world data and notify us if you have any questions, queries or concerns.

Promoting Equality, Diversity & Inclusion in the workplace

We are continually looking at ways to promote ED&I in the workplace, not only through training but also through the online portal and welcome suggestions from our employees at any time.

Version Control:	
Document Name:	Equality, Diversity and Inclusion Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Flexible Working Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

We are committed to attracting and retaining the very best people and utilising all the talent and experience available. We recognise that our employees and potential employees have responsibilities, interests and aspirations outside of the world of work which impact on their time and appreciate that the standard Monday to Friday, 9 to 5 working week is no longer compatible with increasing demand for a better work-life balance.

This policy sets out our approach to flexible working requests under the statutory procedure.

Eligible Employees

All employees who have a minimum of 26 weeks' continuous service have the statutory right to request flexible working. Under the statutory procedure, you can make one request in every 12-month period.

However, we recognise the importance of providing flexible working for all employees. Therefore, if you are not eligible to make a formal request for flexible working under the statutory procedure, you may submit an informal request and we will consider this on an informal basis.

Types of Flexible Working

Examples of flexible working include:

- hybrid working (sometimes referred to as "blended working"), which allows you to split your time between attending the workplace and working remotely
- reducing the number of hours that you are working
- changing your start and finish times
- compressing your working hours into fewer days (for example moving to a nine-day fortnight); and
- working flexitime.

Making a Request for Flexible Working

All requests must be made in writing by email or letter. This should be submitted to your line manager in the first instance.

Any request made under this policy must include:

- the date of the application

- the changes that you are seeking to your terms and conditions of employment
- the date on which you would like the terms and conditions to come into effect
- what effect you think the requested change may have on your organisation, your colleagues and the ability to deliver the service
- how, in your opinion, any such effect might be dealt with
- a statement that this is a statutory request
- whether or not you have made a previous application for flexible working; and
- if you have made a previous request, when you made that application.

Where a request for flexible working does not contain all the required information, you will be asked to resubmit your request with the necessary additional information. Requests that are incomplete or contain errors will not be automatically rejected.

Timescales

Once you submit your flexible working request, it will be dealt with as soon as possible. However, all requests will be dealt with within three months, from receipt of the request to notification of any appeal decision.

The timescales within this policy may be extended where this is mutually agreed.

If you fail to attend a meeting to discuss your flexible working request, including an appeal meeting, and then fail to attend a rearranged meeting without good reason, your application will be deemed to have been withdrawn.

Meeting to Discuss a Flexible Working Request

Your line manager will usually arrange a meeting to discuss your request. The aim of the meeting is to find out more about your proposed working arrangements and how they could be of benefit to both you and the organisation. Be prepared to suggest solutions which will help your case.

Your line manager should aim to hold the meeting to discuss your request within 28 days of receiving it.

You may, if you wish, ask a work colleague or a Trade Union representative to attend the meeting with you.

Where a request can, without further discussion, be approved in the terms set out in your written application, a meeting will not be necessary.

Right to Representation

At any formal meeting you have the right to be represented by a work colleague or a Trade Union representative. However, consideration will be given to another person in exceptional circumstances.

Considering your Request

After the meeting, your line manager will consider your proposed flexible working arrangements carefully, weighing up:

- the potential benefits to both you and the organisation; and
- any adverse impact of implementing the changes.

Each request will be considered on a case-by-case basis - agreeing to one request will not set a precedent or create the right for another employee to be granted a similar change to their working patterns.

Notifying you of the Decision

Your line manager should aim to notify you of the decision as soon as possible and no later than 14 days after the meeting.

Your request may be granted in full or in part. For example:

- we may propose a modified version of your request
- your request may be granted on a temporary basis; or
- you may be asked to try the flexible working arrangement for a trial period.

Reasons for Rejecting a Request

Your request for flexible working will be rejected only because of:

- the burden of additional costs
- an inability to reorganise work among existing staff
- an inability to recruit additional staff
- a detrimental impact on quality
- a detrimental impact on performance
- a detrimental effect on ability to meet customer demand
- insufficient work for the periods the employee proposes to work
- a planned structural change to the business.

Your request will not be rejected for any other reason.

Your Right to Appeal

You have the right to appeal if your request for flexible working is rejected or only agreed in part.

Your appeal should be sent in writing to the appropriate line manager or senior manager within 14 days of receiving our decision. Your letter should set out the grounds on which you are appealing. An appeal meeting will be held within 14 days of you lodging your appeal.

You may, if you wish, ask a work colleague or Trade Union representative to attend the appeal meeting with you.

You will be informed of the outcome of your appeal as soon as possible and no later than 14 days after the appeal meeting.

Flexible Working Requests that are granted

If your request is upheld, you and your line manager should discuss how and when the changes will take effect.

Any changes to your terms and conditions of employment, whether permanent or temporary, will be put in writing and sent to you as an amendment to your contract of employment.

Version Control:	
Document Name:	Flexible Working Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Grievance Policy and Procedure

Introduction

At CDC, we encourage a culture in which you can raise any workplace problems, complaints or concerns in a supportive framework and we will ensure that all grievances are dealt with quickly and fairly. The basic premise that every employee has the right to be treated fairly and with dignity and respect at work sits at the heart of this policy and is governed by the principles of natural justice.

We would strongly encourage employees and managers to resolve grievances informally, wherever possible. Most issues can be resolved informally. However, if an informal approach does not resolve matters, or is not appropriate, you may choose to raise a formal grievance.

This policy outlines the grievance process, the roles of those involved and the support that is available to you. At all stages of the procedure, all parties will observe confidentiality and act with sensitivity. When dealing with grievances and complaints, managers must ensure that equality and diversity considerations are taken into account at every stage of the process.

This policy does not form part of your contract of employment and we reserve the right to amend or withdraw it at any time.

Scope

This policy applies to all CDC employees. It does not apply to contractors, consultants or any self-employed individuals working for CDC.

If you have a grievance that relates to ongoing disciplinary proceedings, you should raise this during the disciplinary procedure with reference to the grievance procedure (for example during the disciplinary meeting or appeal stage). The reason for this is so that the grievance can be addressed in the context of the relevant disciplinary proceedings to which it is related and so that any correction which is applicable can be made quickly and with the least disruption. No individual will suffer a detriment for raising a grievance. An individual may close a grievance at any time.

If you raise a grievance or you whistle-blow during disciplinary proceedings that is unrelated to those proceedings, the disciplinary proceedings and grievance procedure will normally run independently.

Fairness and Respect

We recognise that a grievance procedure can be stressful and upsetting. Everyone involved in the process is entitled to be treated calmly and with respect.

We will not tolerate abusive or insulting behaviour from anyone taking part in a grievance procedure and will treat any such behaviour as misconduct under our disciplinary procedure. Making malicious, vexatious or false allegations will not be tolerated and is a disciplinary offence.

Remote Proceedings

Where it is not possible to hold a face-to-face meeting under this procedure, we will conduct the process remotely. This could happen if you are physically not able/incapable to attend the meeting or if there are practical reasons as to why a face-to-face meeting cannot go ahead. We will ensure that all those participating have access to the necessary technology. Your rights will not be affected, and we will ensure that the procedure remains fair and reasonable.

Adjustments to Proceedings

If any aspect of the grievance procedure causes you difficulty because of a disability, or if you need assistance because English is not your first language for instance, you should raise this with your line manager or the person holding the meeting, who will make appropriate arrangements for you. ADD HYPERLINK to ED&I

Recording of Hearings and Investigation Meetings

We will take a written record of all meetings conducted under this procedure. This will be done either by the person holding the meeting, a member of the HR Team or by an additional person arranged by us to take notes.

You, or any person acting with you or on your behalf, are not normally permitted to record electronically any meeting that we hold under the grievance procedure. This is to encourage openness and full participation. Any breach of this provision may lead to disciplinary action, which could include dismissal.

In certain limited circumstances, we may permit a meeting to be recorded electronically, for example where it is a reasonable adjustment for an employee with a disability. Where we permit a meeting to be recorded electronically, we will take responsibility for making the recording.

Where we intend to record meetings held remotely, we will comply with our data protection obligations and obtain prior consent from all attendees.

Raising an Informal Grievance

In the first instance, you should raise any grievance that you may have informally with your line manager. If your grievance is about your line manager, you should raise this with another manager or HR Business Partner if unsure who to approach.

The relevant manager will meet with you to give you the opportunity to explain your grievance and seek to identify whether the issue can be resolved informally. Many concerns can be resolved informally.

Mediation is a voluntary and confidential process and if you do not wish to take part in mediation, you do not have to. The mediator will be impartial, neutral, and fully trained to conduct mediation whether they be an internal or an external resource. Mediation can help to mend workplace relationships by: -

- Finding solutions that everyone agrees to.
- Improving communication.
- Allowing everyone involved to have control of what is finally agreed.

Mediation can be used at any stage in a disagreement but the earlier the disagreement is dealt with the less chance there is of things becoming more difficult and entrenched.

However, while we encourage the informal resolution of complaints through informal meetings or an agreement to take part in mediation, we recognise that this is not always possible or appropriate, for example if your grievance relates to a serious issue such as discrimination. Therefore, if the informal process does not resolve matters such that you are not satisfied with the outcome or is not appropriate or does not work, you should raise a formal grievance under this procedure.

Raising a Formal Grievance

Where your grievance has not been resolved informally, or if your grievance is serious in nature, you should raise the matter formally in writing. Grievances can be about: -

- Bullying and Harassment (normally dealt with under the Anti-harassment and Bullying policy - hyperlink)
- Communication problems
- Personality clashes
- Relationship breakdowns

To make a formal complaint, you should discuss this first with your line manager. If your complaint is about your line manager, you should raise this with another appropriate manager. If you have any queries about this procedure you should refer to your HR Business Partner. Under the formal procedure within this policy:

- we will ask you to set out your complaint in writing or via email. Please include as much detail as possible, for example:
    - the respondents name (who is/are the key people involved in your complaint)
    - the nature of the complaint
    - the dates of the alleged acts of your complaint
    - names of any witnesses
    - and details of any action taken to address the matter so far
    - any other information that you feel is directly relevant
- you may be asked to discuss this in more detail with the investigating officer,
- we would usually expect the matter to be investigated, which may include meeting with the alleged bully/harasser to ascertain their response to the allegations. It may also include interviewing potential witnesses who we will instruct to keep the matter confidential
- we would usually expect the manager chairing the matter to carry out further investigations of the complaint where necessary
- we would invite you to a meeting to discuss your complaint in full. You will have the right to be accompanied by a colleague or trade union representative
- we would hold a meeting with you to enable us to ask you further questions in light of any information we have gathered from the alleged bully/harasser and/or witnesses
- the chair will consider all the evidence in full and make a decision
- we will inform you of the decision (this will normally be in person without unreasonable delay) and, if we uphold the complaint, instigate disciplinary action up to and including dismissal against the bully/harasser. You will be notified of the timescales involved and any decision will be confirmed to you in writing.

Your complaint should be in writing or on email and sent to your line manager. If your complaint relates to your line manager, you should send your written grievance to another manager (their line manager).

Stage 1 - Investigation

Your grievance will be kept confidential as far as possible. Other people being questioned will be asked to keep the matter confidential.

However, before proceeding to a grievance hearing, we may have to carry out a fact-finding investigation. This will usually be conducted by the same manager who will hear your grievance. The relevant manager will write to you confirming that they are conducting the investigation and the timescale for completion. You have the right to be accompanied by a workplace colleague or TU representative or official to any investigatory meeting that takes place,

The level of investigation and time this will take will vary depending on the nature of your grievance.

You will be given a copy of any evidence, reports produced etc, collated during the investigation in advance of the grievance hearing. However, in some cases, the evidence given by individuals may have to remain confidential. Where confidentiality is necessary, we will provide you with an appropriate summary of the evidence.

Stage 2 - Hearing your Grievance

The Grievance Hearing

The grievance hearing will be held within five working days of receiving your written complaint. However, if this is not possible, you will be informed of the reason for any delay.

You are entitled to be accompanied by a workplace colleague or a trade union representative or official.

The grievance hearing will be conducted by your line manager, unless your grievance relates to your line manager, in which case it will be conducted by another manager.

The purpose of the hearing is for you to explain the nature of your complaint and what action you feel should be taken to resolve the matter. If more information comes to light, it may be necessary to adjourn the grievance hearing to conduct a further investigation and reconvene the hearing when this has been done.

If you are unable to attend the grievance hearing because of circumstances beyond your control, you should inform the line manager conducting the hearing as soon as possible and explain the circumstances. We will reschedule the hearing at least once but if you fail to attend the rescheduled hearing, the grievance hearing may take place in your absence, based on your written grievance statement and any other documentation available.

The Outcome

Following the hearing, the chair will inform you in writing, usually within seven working days after the hearing, of the outcome and any action that will be taken as a result of your complaint.

Right to Representation

At any formal meeting you have the right to be represented by a work colleague or a Trade Union representative. However, consideration will be given to another person in exceptional circumstances.

Stage 3 - Appeal

Appealing Against the Outcome

If you are not satisfied with the outcome of your grievance, you may submit a formal appeal.

You should appeal in writing to the senior manager, named in the grievance outcome letter within seven working days as specified and if you have any questions about the process you should raise them with your HR Business Partner

Your letter should clearly state the grounds of your appeal, i.e. the basis on which you consider that your grievance has not been satisfactorily resolved.

Appeal Meeting

We will then arrange an appeal meeting within seven working days to consider the matter. However, if this is not possible, you will be informed of the reason for any delay.

You are entitled to be accompanied at the appeal meeting by a workplace colleague or a trade union official.

The appeal meeting will be conducted by the appointed manager, a member of the HR Team or delegated person, who will consider your grounds for appeal and review the conclusion reached in the original grievance hearing.

If you are unable to attend the appeal meeting because of circumstances beyond your control, you should inform the manager conducting the meeting as soon as possible and explain the circumstances. We will reschedule the meeting at least once but if you fail to attend the rescheduled meeting, the meeting may take place in your absence, based on your written grievance statement and any other supporting documentation available.

Outcome of Appeal

Following the appeal meeting, the relevant manager who was appointed as chair will inform you in writing, usually within seven working days, of the outcome. The outcome of the appeal is final.

Collective Grievances

If you and another employee (or more than two of you) have identical grievances and you all wish to have it addressed in one grievance process, you can raise a collective grievance. We retain the right to hear your grievances individually if your grievances are not identical, or there are exceptional circumstances.

If you are raising a collective grievance, the requirements set out in this policy are varied as follows.

Raising a Formal Grievance

Your written complaint should still be submitted as an individual document and be headed "Formal collective grievance". You and your colleagues will need to nominate one of you to act on behalf of all of you throughout the grievance process. Your grievance letter must identify whom you have appointed to be the nominated representative.

If you and your colleagues are all members of the same trade union, your trade union representative may raise the collective grievance on your behalf.

Stage 2 - Hearing your Grievance

If you have been appointed to be the nominated representative, you will be invited to attend one collective grievance meeting. You will be entitled to be accompanied by a fellow employee or a trade union official. Following the meeting, there will be one identical outcome. You and your nominated representative will be notified of the outcome in writing and any action that will be taken as a result of your collective complaint. Where the nominated representative wishes to be accompanied at the grievance meeting by one of the other employees taking out the grievance, they may request this from the chair of the meeting.

Stage 3 - Appeal

If you, or any of your colleagues, are not satisfied with the outcome of your collective grievance, you may submit a formal appeal, your appeal should be headed "Formal collective appeal". You should appeal individually in writing to the Senior Manager named in your outcome letter within seven working days of receipt of the collective grievance outcome letter.

If you have been appointed to be the nominated representative, you will be invited to attend one collective grievance appeal meeting. You will be entitled to be accompanied by a fellow employee or a trade union official. Following the appeal meeting, there will be one identical outcome. You and your nominated representative will be notified of the outcome in writing. Where the nominated representative wishes to be accompanied at the grievance meeting by one of the other employees taking out the grievance, they may request this from the chair of the meeting.

The outcome of the collective appeal is final.

If only one employee wishes to appeal, the normal grievance procedure will apply to the appeal.

Version Control:	
Document Name:	Grievance Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

Health and Safety Policy

Statement of Intent

Cotswold District Council recognises employees are a valuable resource and the health, safety, wellbeing and security of our colleagues is paramount:

Our commitment to managing health and safety:

- Encourage a positive health and safety culture where employees, councillors, suppliers, contractors and other stakeholders respect and support each other, stepping in where necessary to maintain a safe working environment.
- Comply with all applicable legal (and other) requirements appropriate to our businesses.
- Consider health and safety in our business decisions, ensuring all risks are properly assessed and managed.
- Elected councillors of Cotswold District Council understand that the health and safety implications of decisions, particularly budget and target setting must be considered alongside other decision-making criteria. Councillors acknowledge the key part they must play in the monitoring and review of health and safety performance and support the principles of this policy in the council's approach to managing health and safety.
- Provide information, instruction, training and supervision to employees and others as is necessary to implement and maintain high standards of health and safety.
- Require everyone who works for and with us to take responsibility for their own health and safety, consider how their actions may impact on others and empower them to stop work when an unsafe condition arises.
- Ensure we provide and maintain a working environment that is safe and has appropriate facilities.
- Ensure we provide and maintain safe plant and equipment.
- Involve and listen to employees in matters relating to their health and safety to secure their commitment and participation at all levels.
- Develop appropriate health and safety procedures to prevent accidents and cases of work-related ill health and ensure we learn from our experiences.
- Implement emergency procedures, including evacuation in case of fire or another significant incident.

This policy is regularly reviewed to ensure it continues to meet the council's business requirements and legislation.

Signed

Cllr Joe Harris
Leader of Cotswold District Council

Date:

Signed

Robert Weaver
Chief Executive Officer

Date:

1. Legislation

Health and Safety Legislation is regulated by the Health and Safety Executive, with the main piece of legislation being the Health and Safety at Work Act 1974 which places general duties on employers in protecting employees and others in the workplace. To support the Health and Safety at Work Act, various regulations have been developed that place more specific responsibilities on employers, compliance with which must be demonstrated.

To support this policy and the council's overall health and safety management, specific policies and statements have been produced by Publica Group (Support) Ltd which demonstrate compliance with the statutory duties placed on Cotswold District Council.

2. Roles and Responsibilities

2.1 Elected Councillors

- Ensure that suitable and adequate resources and strategic direction are available to discharge the Council's health and safety responsibility
- Monitor, the overall performance of the Council's health and safety management system
- Have a duty to conduct their business and make decisions in conformity with health and safety legislation and the council's own policies.
- Agree all new or amended policies and statements as they are updated or developed

2.2 Chief Executive Officer

- Take overall responsibility for health and safety across the Council and lead in setting policy and direction.
- Take responsibility for ensuring that the overarching Health and Safety Policy is in place and that it is reviewed and updated on a regular basis.
- Ensure that suitable and adequate resources and strategic direction are available to discharge the council's health and safety responsibility.
- Monitor the overall performance of the council's health and safety management system.
- Ensure health and safety is a regular agenda topic at LMT meetings and that the LMT attendees are kept informed by the health and safety business partner of significant health and safety developments and performance matters.

2.3 Deputy Chief Executive and Director of Governance and Development

- Ensure that this policy is put into practice.
- Provide strategic direction and oversight of health and safety policies.
- Ensure that robust health and safety management arrangements and organisation exist.
- Support the Chief Executive Officer by meeting their health and safety responsibilities.

2.4 Managers

- Ensure that robust health and safety arrangements exist in their areas of responsibility.
- Ensure staff are aware of and comply with health and safety arrangements.
- Report and investigate all accidents and incidents as required.

2.5 Health & Safety Business Partner (Publica Ltd)

- Be the 'Competent Person' as set out in the Management of Health and Safety at Work Regulations 1999.
- Keep up to date with current legislation and best practice and provide appropriate and timely advice and support to employees.
- Report injuries, diseases and dangerous occurrences to the Health and Safety Executive.
- Support incident investigations as appropriate and liaise with enforcing authorities.

2.6 Employees / Councillors / Volunteers / Contractors

- Familiarise themselves with the contents of this policy, Publica statements and guidance that relate to their work and meet the standards required of them whilst carrying out their work activities.
- Attend any specific health and safety training required to enable them to carry out their job/role safely.
- Work with due regard to the health and safety of themselves and others affected by their work activities.
- Draw attention to any health and safety hazards or deficiencies to an appropriate person.
- Provide relevant documentation as required with regard to matters of health and safety, including insurance and competency certificates.

3. Arrangements for Health and Safety

3.1 Workplace (Health, Safety & Welfare)

Property Services (Publica Ltd.) will:

- Ensure the relevant legislative requirements are met including the display of the Health and Safety Law Poster and Public Liability Certificate.
- Ensure working areas and arrangements meet the minimum standard as set out in the Workplace (Health, Safety and Welfare) Regulations.
- Ensure a suitable and sufficient assessment is carried out to identify adequate health, safety and welfare provision for the premises.
- Ensure the premises are inspected, tested and maintained for safe use as necessary.
- Ensure that appropriate records are kept of all risk assessments and information, training and instruction given to staff, maintenance records and inspection sheets.

3.2 Risk Assessments

Managers will ensure that suitable risk assessments are implemented, and relevant action taken. Risk Assessments will be reviewed when work or working conditions change.

3.3 Training

All staff receive a full induction and online refresher training where necessary. Specific training needs can be addressed via Publica's Learning & Development Team. Suitable arrangements are in place for employees who work remotely.

3.4 Consultation

Managers will consult with employees on all matters affecting their health and safety, including risk assessments. The council will also consult with staff representatives (including unions) as appropriate.

3.5 Monitoring and audit

Monitoring will be by way of inspection of workplaces and properties occupied by Publica, other clients and owned by Cotswold District Council.

Audits will be carried out by the Health and Safety Business Partners on a regular basis and the results communicated at the appropriate level (Audit and Governance Committee) for consideration and if necessary, action on an annual basis.

3.6 Evacuation

The Chief Executive, who is the responsible person under the RRFSO (Regulatory Reform Fire Safety Order), has overall responsibility for fire safety. The Evacuation Plan applies to everyone working on or visiting the premises. The plans are tested regularly and updated if necessary.

3.7 Support

Publica guidance documents support the arrangements in place to achieve the statement of intent. (Available via the staff portal) These documents are reviewed on a regular basis, to take into account legal requirements and best practice guidance.

Version Control:	
Document Name:	Health and Safety Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Long Term Sickness Absence Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

Having a culture that is diverse, equitable and inclusive is core to everything that we strive to achieve and key to the creation of a positive organisational environment. CDC is also committed to promoting the health and wellbeing of all employees and we wish to offer supportive and effective management of absence due to ill-health and a positive healthy culture that empowers managers to handle sensitive situations in the correct way.

Cotswold District Council is committed to dealing fairly and sympathetically with employees who are absent from work for long periods because of ill health and aim to assist them with their rehabilitation and eventual return to work.

CDC will always treat employees fairly and sensitively during times of sickness and ill health, it must also pay due regard to its operational needs. By implementing this policy, CDC aims to strike a reasonable balance between the pursuit of its operational needs and the genuine need of employees to take time off work because of ill health.

This policy recognises CDC is under a legal duty to consider making reasonable adjustments, and will do this in collaboration with the employee who becomes disabled or their disability worsens. This is to enable the employee to continue to carry out their role and to support any identified disadvantage being removed.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of the management.

Definitions

The following definitions are used in this policy:

"Absence management stages" our step by step process for managing frequent Short-term sickness absence.

"Period of sickness absence" or **"instance of sickness absence"** means any continuous period of sickness absence, of whatever length, during which the employee does not work.

"Short-term sickness absence" means any period of sickness lasting one to 27 calendar days.

"Long-term sickness absence" means any period of sickness lasting 28 calendar days or more.

"Formal review period" means a defined period during which an employee is required to show an improvement in their sickness absence levels.

Scope

This policy covers long-term sickness absence, which is defined as an absence lasting at least 28 calendar days. CDC operate a separate policy on short-term sickness absence, which is defined as an absence lasting one to 27 calendar days. - hyperlink to the Sickness Absence policy.

Where an employee is on long-term sickness absence, but returns to work for short periods, we reserve the right to continue to manage their sickness absence under this policy, even in the case where an employee has returned to work for a short period.

This policy assumes that, if misconduct is suspected, our separate disciplinary procedure will apply, for example if there is evidence that:

- absence is not genuine or not for the reason provided
- the employee is undertaking inappropriate activities while off sick, such as carrying out work for another employer or
- the correct sickness absence notification and evidence procedure has not been followed.

Under our absence policy in cases of capability where an individual may be unable to fulfil their substantive role because of sickness or a disability, it may be appropriate to consider alternative action under the performance improvement and capability policy. Alternatively, there may be cases under our Absence management stages where the disciplinary procedure applies.

This policy applies to employees only and does not apply to contractors, consultants, agency workers or any self-employed individuals working for us.

Employees' Responsibilities

Employees are expected to:

- provide medical evidence for sickness of more than seven calendar days (with sickness of seven calendar days or less being self-certified)
- continue to keep in touch with their manager while unable to attend work. How frequently this is should be agreed in advance with your line manager
- share as much information with their manager about the reason (i.e., the nature of the illness or injury) why they cannot attend work and how long they think the absence will last
- do what is possible to enable a return to work, for example by following medical guidance, taking steps recommended by healthcare professionals during rehabilitation, and not undertaking any activities while on sick leave that could exacerbate the health problem
- tell their manager of any extenuating circumstances, for example personal or family problems or an unmanageable workload
- bear in mind that we may seek a medical report, for example from their doctor or our occupational health advisers
- cooperate with the possible implementation of any adjustments to job duties, hours or working conditions, particularly those suggested by a healthcare professional and
- attend a return-to-work meeting when returning to work following long-term sickness absence.

Medical Evidence

All sickness that lasts longer than seven calendar days requires medical evidence (with sickness of seven calendar days or less being self-certified). This medical evidence will normally be in the form of a fit note, also known as a "statement of fitness for work".

As well as being issued by doctors, fit notes can be issued by nurses, occupational therapists, pharmacists and physiotherapists who have assessed their fitness for work. Fit notes cannot be issued on request or via over-the-counter services without an assessment.

If the employee is absent for eight calendar days or more, their line manager must ensure that they provide a fit note as soon as possible. A fit note may state that the employee:

- is "not fit for work", in which case the employee should remain off work or
- "may be fit for work", if the recommendations are followed (for example, a phased return, amended job duties, altered hours of work, or workplace adaptations).

While there is no legal obligation to follow the recommendations, managers should take the recommendations seriously and give fair consideration - in consultation with the employee and Human Resources - as to whether any of the changes recommended can be accommodated.

The fit note will state the period that it covers, with a section for a start and end date. An employee on long-term sickness absence who is not returning to work on the next working day after the end date must obtain a new fit note.

Long term absence management stages

The following procedure aims to provide a consistent approach to managing long term absence initially through informal interventions, and where attendance does not improve/attendance targets are not met and concerns continue, through a formal process.

Managers are expected to keep in touch

It is important that managers maintain contact with an employee on long-term sickness absence to:

- monitor the employee's progress in terms of their return to health
- support the employee and actively maintain their engagement with us
- provide information to the employee so that they may make informed decisions (for example, in relation to sick pay entitlement)
- provide practical support from our occupational health advisers
- encourage a return to work as early as possible
- facilitate a phased return to work if required, by making appropriate temporary or permanent adjustments and
- ensure that the employee remains informed about events in the workplace.

It is the joint responsibility of both the line manager and the employee to maintain contact. Once the employee is on long-term sickness absence (i.e. once the employee has reached 28 days' continuous absence), the employee's line manager should contact the employee to agree the method and frequency of contact. Contact should be on a regular basis and the frequency of this contact should be agreed mutually, but no less than monthly.

Home visits

In some circumstances, contact with an employee on long-term sickness absence can be maintained via home visits. Home visits will take place only with the prior consent of the employee at mutually agreed times.

Home visits will usually be conducted by the employee's line manager. The line manager will normally be accompanied by a representative from Human Resources. Where the employee is female, at least one of

the visitors should always be female. The employee may be accompanied during the visit if they wish, for example by a family member or an employee representative.

If the employee would prefer our representative not to visit them in the home, another location near the employee's home (such as a local cafe or leisure centre) could be mutually agreed.

Sick Pay

CDC operates a contractual sick pay scheme that supplements Statutory Sick Pay and Employment and Support Allowance to maintain normal pay during defined periods of absence on account of sickness, disease, accident, or assault.

Providing you follow the correct procedure as detailed in this document, you will normally receive:

Year 1 of service	1 months' full pay (after 4 months' service)
Year 2 of service	2 months' full pay and 2 months' half pay
Year 3 of service	4 months' full pay and 4 months' half pay
During Year 4 and Year 5 of service	5 months full pay and 5 months half pay
After 5 years of service	6 months full pay and 6 months half pay

The Employee is required to cooperate fully with CDC when a medical referral to the Occupational Health Advisor is required.

The employee may be entitled to receive SSP if contractual sick pay is withheld or suspended, this may be in cases where we are not satisfied that the employee is ill, and no evidence of sickness is provided, or they remain within their probationary period for example.

Sick pay under our contractual scheme is subject to the usual deductions for PAYE, national insurance, pension contributions, etc.

Payments under our contractual scheme will be calculated by reference to the employee's salary only and any payments made under our contractual scheme are inclusive of any entitlement to SSP for the same period of absence.

Holiday during Sick Leave

An employee who is absent on sick leave will continue to accrue their holiday entitlement and will be given the opportunity to take this at a later date, including in the subsequent leave year, if they do not take the holiday entitlement due to being on sick leave.

An employee may wish to use annual leave to support their gradual return to work following a period of absence. The manager will seek to accommodate any requests where possible.

An employee on sick leave may apply to take their holiday entitlement while on sick leave. The holiday dates must be approved by the line manager, in accordance with internal procedures.

Medical Advice

Occupational health referrals

At various stages of managing the employee's sickness absence, a manager may want to obtain advice on the employee's fitness for work from occupational health advisers. The manager should liaise with their HR Business Partner for support on this process.

Examples of when a line manager might refer to occupational health include:

- seek a medical report on the employee
- establish when the employee might be able to return to work
- ask for guidance on the employee's condition, for example if there is a possibility that the employee is disabled or where there is ambiguity as to the exact nature of the condition
- seek guidance on a referral for counselling or some other therapeutic support and
- discuss any adjustments that could be made to accommodate the employee's disability, if the employee is disabled.

CDC will treat personal data about you collected during the absence management process in accordance with its data protection policy / policy on processing special categories of personal data (this may include medical certificates or information given by you about your sickness). Information about how an employee's data is used and the basis for processing their data will be provided in the privacy notice which contains the data protection information. Where CDC is relying on its legitimate interests as the legal ground for processing an employee's data, you can object to the processing.

Report from a medical practitioner who has been responsible for the employee's clinical care

Occupational Health may request a report from the employee's medical practitioner where necessary. The employee will be fully informed of their rights under the Access to Medical Reports Act 1988 and their permission will be sought for the report to be obtained.

The employee's permission will be sought to contact the medical practitioner on the relevant consent form, available from Human Resources.

The employee has the right to access the report before we see it. If the employee wishes to see the report, they should inform us of this, so that it can inform the medical practitioner. The employee will then have 21 days from the date of making the application for the report to contact the medical practitioner to see the report. If the employee does not contact the medical practitioner within this period, the medical practitioner can pass the report on to us.

When requesting a report, we will provide the medical practitioner with as much information as possible on the role of the employee and explain why the report is being sought. We will provide the medical practitioner with:

- a copy of the employee's signed form consenting to the request to seek a medical report
- confirmation that the employee is aware of their rights under the Access to Medical Reports Act 1988 and
- details of the major features of the employee's job.

We will ask the medical practitioner to identify:

- the nature of the employee's illness or injury
- when the employee is likely to be fully fit to resume their normal duties

- if the employee is unfit to resume their normal duties, what alternative duties they might be fit to undertake
- when the employee is likely to be fit to undertake any alternative duties
- what reasonable adjustments could be made to working conditions or work premises to facilitate a return to work and
- the likelihood of recurrence of the illness or injury once the employee has returned to work.

Where the employee refuses us permission to contact their medical practitioner, we will explain to the employee the reasons behind the request and inform the employee that a decision relating to their employment may be made without the benefit of access to medical reports. The same procedure will be followed where the employee delays in giving their consent.

Where the employee feels that the report is misleading or incorrect, they may ask the medical practitioner to amend it. If the medical practitioner does not agree with the employee and does not alter the report, the employee may attach a statement to the report to reflect their views.

Alternatively, having seen the report, the employee may request that access to the report be withheld from us. The employee will be informed that a decision relating to their employment may be made without the benefit of access to medical reports.

Report from a medical practitioner who has not been responsible for the employee's clinical care

The Access to Medical Reports Act 1988 does not apply where we are seeking a medical report from a medical practitioner who has not been responsible for the employee's clinical care, typically our own chosen specialist or occupational health adviser.

When seeking additional medical advice we will explain to the employee in writing what information we are seeking on the employee's health, why we are seeking additional information and how the information will be used. The letter should explain to the employee:

- that we intend to obtain a medical report and why we wish to do so
- from whom the report will be obtained
- what we will do with the report
- how we will treat personal data collected when obtaining the medical report and
- their right to object to the processing of their personal data.

We will write to the medical practitioner to request the report. The letter should explain to the medical practitioner why we are requesting the report and ask any specific questions that we wish the practitioner to answer.

Where the employee objects to the processing of their personal data when we are seeking to obtain a medical report to which the Access to Medical Reports Act 1988 does not apply, we will explain to the employee the reasons behind the request and inform the employee that a decision relating to their employment may be made without the benefit of access to medical reports.

Occupational Health Referral

Once an employee has been absent for 28 calendar days, or as soon as it is confirmed that they will be absent for at least 28 days (for example, a fit note has signed them off for that period), their manager should contact the occupational health department.

The line manager should also contact the employee to advise them that the occupational health department will be in touch, with a view to us seeking medical advice on the employee's prognosis.

Return-to-Work Arrangements

Employees who have been on long-term sickness absence should be supported to return to their former post and way of working, but we recognise that this is not always possible. We see the value of phasing employees back to work, temporarily adjusting their duties, or redeploying them permanently if they cannot return to their previous role.

CDC understands that employees are more likely to remain at work and not go off sick again if they initially return to work on reduced hours and gradually build up their number of hours. We will always arrange a return-to-work meeting for an employee returning from long-term sickness absence. This may be during the period immediately prior to their return or on the first day back in work. Either way this will be discussed and agreed with the employee.

When the employee returns to work, the employee's line manager should arrange to reintroduce the employee back into the workplace and ensure that arrangements are made to support the employee on their return. These arrangements should include any agreed adjustments and (where necessary) a risk assessment.

Phased return to work

A phased return to work could involve a variation in work hours, a gradual increase in hours, or an initial period during which the employee works from home on certain days. This would be to support an employee to transition from ill-health absence back to full (or sometimes permanently amended) work duties.

The phased return to work will usually arise following medical advice, which could be:

- a doctor's letter or medical report (such as an Occupational Health report) recommending a phased return; or
- one of the options on a fit note.

The line manager, with the support of Human Resources, should discuss how best to manage a phased return to work and what if any reasonable adjustment will be required. A phased return to work should not be considered where the employee remains unfit for any work.

Next steps:

- The employee's line manager should invite the employee to a meeting to discuss the medical advice and the possibility of a phased return to work.
- The invitation, which should be in writing, should inform the employee in advance of the arrangements for the meeting, including who is to attend on our behalf.
- Issues such as mobility or work related stress will be taken into account when deciding on where the meeting will be held.

The meeting should focus on:

- reviewing any risks prohibiting a phased return to work
- determining a start date, initial scope of work and hours
- whether there will need to be any changes to the employee's work environment or workplace during the phased return to work and/or once the phased return to work is completed
- when and how the employee's work and hours will develop during any phased return to work
- what arrangements will be put in place to monitor the employee's progress during any phased return to work
- the employee's pay during any phased return to work and

- to whom the employee should report if there are any difficulties with their return to work.
- what risk assessments, if any need to be undertaken for workplace adjustments
- notes should be taken as to what has been discussed and agreed at the meeting and what review has been agreed in a return-to-work plan.
- the review period will require a further meeting, and the date and arrangements for the next meeting should be agreed at the end of the first meeting.
- The individual should be made aware of any impact to their salary. If sick pay has been exhausted consideration might be given to leave accrual for example.

Temporary reassignment

Where an employee has been on long-term sickness absence, but is unfit to return immediately to their substantive role, even on a phased basis, their line manager should consider temporarily reassigning the employee to another role.

The possibility of a temporary role will depend on:

- the availability of work elsewhere and the employee's agreement to undertake the role.
- The employee's line manager should initially consider whether a different role is available within their department and, if it is not, widen the search to include other departments.
- The line manager should do this by liaising with HR about available vacancies in other departments in areas in which the employee's skills could be utilised.

The employee's existing rate of pay will be protected during the temporary reassignment and their salary will be paid by the department in which the employee normally works. Temporary placements to help an employee on long-term sickness absence will normally last no longer than six months and would be regularly reviewed during this period. Any reassignment should be discussed in full with the individual and a return to work plan documented.

Permanent redeployment

We will consider redeployment where it appears unlikely from the medical advice that an employee on long-term sickness absence will be able to return to their existing role.

Any offer to redeploy the employee will be entirely at our discretion. Such an offer will be made only where we are confident that the employee is no longer able to continue to work in their current role and will be able to perform well in the redeployed role.

If you have a disability under the Equality Act 2010 you will have 'at risk' status. This means that you will have priority when we consider an alternative role with us. We will take a positive approach to redeployment. A trial period, on a four week basis, will be offered for alternative roles, to enable the employee and the new manager to assess whether the job is suitable. With the support of the HR Business Partner, the manager will be supported in identifying if there is a need to make reasonable adjustments to assist you to continue in work.

While the employee is free to refuse any offer of redeployment, the only alternative available will usually be dismissal. If we believe that there is no suitable alternative role available for the employee, we may be left with no option but to dismiss.

Should the employee choose to accept permanent redeployment, they will be asked to agree to a variation of contract that could impact existing contractual arrangements such as pay. However, continuous service should not be affected.

Before an employee is dismissed due to no suitable role being available or because they unreasonably refuse an offer of redeployment, a formal sickness absence meeting with the employee at risk of dismissal will be held. The employee has the right to be accompanied to such meetings by a work colleague or Trade Union representative. Such action may be considered with reference to the performance improvement and capability policy, or the disciplinary procedure.

If the employee is dismissed, they should be given the opportunity to appeal against the dismissal.

Any dismissal will be with full notice or payment in lieu of notice.

Right to Representation

At any formal meeting you have the right to be represented by a work colleague or a Trade Union representative. However, consideration will be given to another person in exceptional circumstances.

Return-to-Work Meetings

When an employee is returning to work following long-term sickness absence, their manager should:

- arrange to meet informally with them.
- ideally, the return-to-work meeting will take place prior to the employee's return to work, to allow time for any necessary adjustments to be made to the employee's working arrangements and conditions.
- if this is not possible, the return-to-work meeting should take place on the employee's first day back at work.
- the return-to-work meeting should take place in a private place, and all discussions between the employee and the manager will be deemed private and confidential.
- the return-to-work meeting could take place off-site at a location of the employee's choosing, should the employee be more comfortable with that approach.

During a return-to-work meeting after long-term sickness absence, the manager and employee should discuss:

- the arrangements for the employee's return to work, including any adjustments that are being made such as a phased return or homeworking
- what work the employee will be doing on their return to work, including an outline of work during the employee's first week back
- any medical issues of which the employer is not already aware, such as any updated guidance from a healthcare professional
- what arrangements will be put in place to monitor the employee's progress and
- to whom the employee should report if they have any difficulties with the arrangements.

At the end of the return-to-work meeting, the line manager and employee should

- agree their next meeting to monitor the employee's progress.
- if the return-to-work meeting takes place before the employee's return, this should be a short meeting on their first day back.
- if the return-to-work meeting takes place on the employee's first day back at work, this meeting should be at the end of the employee's first week back.
- during any of these return-to-work meetings you may, should you wish, choose to be accompanied by a colleague or Trade Union representative.

Special Cases

Pregnancy-related absences

Pregnant employees who are off work because of pregnancy-related ill health must abide by our absence reporting procedure. For example, a pregnant employee is subject to the usual notification and evidence requirements and should be asked to attend a return-to-work meeting when returning to work.

However, any sickness absence by a pregnant employee for a pregnancy-related reason should not be taken into account when checking the need for formal action.

If the manager is in any doubt as to whether a pregnant employee's absence is related to their pregnancy, the manager should contact Human Resources for clarification.

Disability-related absences

Where an employee gives as the reason for absence an underlying health issue that could amount to a disability under the Equality Act 2010, the manager should discuss the case with Human Resources. This includes where the employee states that they are suffering from stress or anxiety.

Managers should remember that we are under a duty to make reasonable adjustments for disabled employees.

Ill-health retirement

Retirement on the ground of ill health will be considered where:

- it appears unlikely from the medical advice that an employee on long-term sickness absence will be able to return to their role; and
- they are entitled to a pension/lump sum under their pension scheme.

If ill-health retirement is raised as an option, the employee's line manager should advise the employee in the first instance to contact Human Resources. This will allow the employee to find out if they qualify for, and the financial implications of accepting, ill-health retirement.

Where an employee is suffering from a terminal illness, we will endeavour as far as possible to accommodate their wishes and to provide the most financially advantageous arrangements for them and their family. This includes discussion of the possibility of ill-health retirement or the termination of employment with a lump-sum payment under their pension scheme.

While we will support employees who wish to continue working, employees with a terminal illness should be aware that there may come a time when they will be unable to continue working. In this case, the employee's line manager will discuss the options with the employee, with the support of Human Resources.

Terminally ill employees who choose to continue working should consider that, while there is no obligation to inform CDC or any of their colleagues about the illness, it is normally better to do so to allow the proper support to be provided.

CDC provides an employee assistance programme so that the employee can access the support that they might need.

Version Control:

Document Name:	Long Term Sickness Absence Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

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COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Maternity Leave Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

This policy sets out the rights of employees who are pregnant or have recently given birth, including time off for antenatal appointments and entitlement to maternity leave and pay.

The following definitions are used in this policy:

"Expected week of childbirth" means the week, starting on a Sunday, when your doctor or midwife expects you to give birth.

"Qualifying week" means the 15th week before your expected week of childbirth.

The policy does not form part of your contract of employment, and we reserve the right to amend it at any time.

Scope

This policy applies to employees employed by CDC. It does not apply to contractors, consultants or any self-employed individuals working for the organisation.

Entitlement to Ordinary and Additional Maternity Leave

All pregnant employees are entitled to take 26 weeks' ordinary maternity leave followed immediately by 26 weeks' additional maternity leave.

You can decide how much maternity leave you wish to take. However, you must take at least two weeks of compulsory maternity leave immediately after your child is born.

To exercise your right to take maternity leave, you must comply with the notification procedure set out in this policy.

Ideally, you should notify your line manager as soon as possible that you are pregnant so that you may take paid time off to attend your antenatal appointments. This will also help us to ensure that we are able to address any health and safety concerns in a timely manner.

Time Off for Antenatal Appointments

Once you have told us that you are pregnant, you will be entitled to reasonable paid time off work to attend your antenatal appointments. This may include relaxation and parent craft classes that your doctor,

midwife or nurse has advised you to attend, in addition to medical examinations, screening tests and any midwife appointments.

After your first appointment, we may ask you to provide proof of your further antenatal appointments such as an appointment card or an equivalent document confirming your booking.

You should give your line manager as much notice as possible of your antenatal appointments and, wherever possible, try to arrange them outside your core hours/as near to the start or end of the working day.

Any individual who has a qualifying relationship with you (which includes your spouse, civil partner and the father of your expected child), has a statutory right to unpaid time off to accompany you to up to two antenatal appointments. They would need to contact their employer to request time off in these circumstances.

Health and Safety

We have a duty to take care of the health and safety of all our employees.

We have an additional duty to carry out an individual risk assessment as soon as we receive written notice that an employee is pregnant, has given birth in the last six months or is breastfeeding where the work is of a kind that could pose a risk to their health or their baby.

Where we carry out an individual risk assessment, we will inform you of any risks that we have identified and the steps that we propose to take to eliminate or reduce them. This may mean altering your working hours, changing your working conditions, or offering you suitable alternative work.

In certain cases, we may have to suspend you from work until the risk to you or your baby has been removed. If you are suspended, your employment will continue during any period of suspension. You will also be entitled to your normal salary and contractual benefits, unless you have unreasonably refused an offer of suitable alternative employment.

Sickness Absence

If you are absent from work due to a pregnancy-related illness, you will receive sick pay in the same way as you would during any other sickness absence.

However, if you are absent from work due to a pregnancy-related illness in the four weeks immediately before your expected week of childbirth, your maternity leave will start automatically. You must notify your line manager as soon as reasonably practicable that you are absent for a pregnancy-related illness and the date that your absence began.

Notice to take Maternity Leave

You can start your maternity leave at any time from the Sunday at the beginning of the 11th week before your expected week of childbirth.

To take maternity leave, you need to give your line manager notice in writing by the end of the qualifying week, or as soon as possible afterwards, of:

- the fact that you are pregnant
- your expected week of childbirth and
- the date on which you wish your maternity leave to start.

You will also have to provide your line manager with your MAT B1 form, which is a certificate from your doctor or midwife confirming your expected week of childbirth.

Failure to give the required notice and provide us with your MAT B1 form may affect your entitlement to maternity leave and pay.

We will write to you within 28 days of receipt of your notice confirming the date on which you are expected to return to work if you take your full 52-week entitlement to maternity leave.

Changing your Maternity Leave Start Date

If you wish to bring forward your maternity leave start date, you must inform your line manager in writing at least 28 days before the new start date or, if that is not possible, as soon as reasonably practicable.

The date that you select as your maternity leave start date cannot be before the Sunday at the beginning of the 11th week before your expected week of childbirth.

If you wish to postpone your maternity leave start date, you must inform your line manager in writing at least 28 days before the original proposed start date or, if that is not possible, as soon as reasonably practicable.

If you change your maternity leave start date, we will write to you within 28 days of the start of your maternity leave confirming the revised date that you must return to work if you take your full 52-week entitlement to maternity leave.

Starting your Maternity Leave

Your maternity leave will usually start on the date that you have chosen, unless:

- your child is born before your chosen maternity leave start date, in which case your maternity leave will start on the day after you give birth; or
- you are absent for a pregnancy-related reason (for example, if you are off sick for a pregnancy-related illness or suspended on health and safety grounds) in the four weeks before your expected week of childbirth, in which case your maternity leave will start on the day after your first day of absence.

If you give birth before your intended maternity leave start date, you must notify your line manager in writing of the date that you have given birth as soon as reasonably practicable.

Maternity Pay

Statutory maternity pay is payable for up to 39 weeks of your maternity leave.

The first six weeks is payable at 90% of your average weekly earnings. The remaining 33 weeks is payable at a rate set by the Government for the relevant tax year, or at 90% of your average weekly earnings (whichever is lower).

You will qualify for statutory maternity pay if :

- you have been continuously employed for at least 26 weeks at the end of your qualifying week
- you are still pregnant 11 weeks before the start of your expected week of childbirth (or have already given birth)
- you have provided us with a MAT B1 form confirming your expected week of childbirth
- you have stopped working and

- your average weekly earnings are not less than the lower earnings limit for national insurance contributions.

If you become eligible for a pay rise between the start of the original calculation period and the end of your maternity leave, your statutory maternity pay will be recalculated to take account of your pay rise, regardless of whether statutory maternity pay has already been paid. This means that your statutory maternity pay will be recalculated and increased retrospectively, or that you may qualify for statutory maternity pay if you did not previously. In these circumstances, you will be paid a lump sum to make up any difference between statutory maternity pay already paid and the amount payable as a result of the pay rise.

Statutory maternity pay is treated as earnings and is therefore subject to PAYE and national insurance deductions.

Occupational Maternity Pay (OMP)

You may be entitled to receive Occupational Maternity Pay (OMP)

To qualify for OMP you must:

- Have at least one year's continuous service at the beginning of the 11th week before the Expected Week of Childbirth (EWC).
- Declare that you intend to return to work at the end of your maternity leave.

At what rate is OMP paid and for how long?

- For the first 6 weeks, you will receive 9/10 of a week's pay (this will be offset against any entitlement to SMP or Maternity Allowance receivable during those 6 weeks)
- For the following 12 weeks you will receive half pay plus SMP (if you qualify). The sum of the half pay plus the SMP must not exceed your normal full pay. If it does, your pay will be adjusted accordingly.
- The 12 weeks' half pay is paid on the understanding that you return to work for a period of at least 3 months. If you do not return for a 3-month period, you will have to pay the money back
- If you are unsure about returning, you can opt not to receive the half pay whilst you are on maternity leave. If you do subsequently return (providing it is for at least 3 months), the half pay can be paid retrospectively as a lump sum. You can choose to have the half pay spread evenly over the 33 remaining weeks of paid Maternity Leave rather than paid over 12 weeks

Both SMP and OMP are subject to the usual deductions for Income Tax, National Insurance and, where applicable, Superannuation.

Payment of enhanced maternity pay includes any entitlement to statutory maternity pay that may be due to you for the same period.

Maternity Pay will be paid in the usual way on your normal pay day.

Maternity Allowance

If you are not entitled to statutory maternity pay, you may qualify for maternity allowance from the Government. If this is the case, we will provide you with an SMP1 form so that you are able to pursue a claim for maternity allowance.

Your Rights During Maternity Leave

During ordinary maternity leave and additional maternity leave, all the terms and conditions of your contract except normal pay will continue. Your pay will be replaced with statutory maternity pay if you are eligible for it. However, other benefits such as holiday entitlement and pension contributions will continue as set out below.

Holiday Entitlement

You will continue to accrue your holiday entitlement during your maternity leave.

You should make every effort to take any outstanding holiday entitlement before commencing maternity leave or immediately after your maternity leave has ended. Any holiday entitlement that has not been taken because of maternity leave may be carried over into the next holiday year with the agreement of your line manager or a director.

Pension Contributions

We will continue to make pension contributions based on your normal pay during ordinary maternity leave and any period of paid additional maternity leave. The contributions that you make will be based on the actual pay that you receive during your maternity leave.

Our pension contributions will cease during any period of unpaid additional maternity leave.

Contact during Maternity Leave

We reserve the right to maintain reasonable contact with you during your maternity leave. This may be to discuss your plans for returning to work, to discuss any special arrangements to be made or training to be given to ease your return to work, or to update you on developments at work during your absence.

Keeping-in-Touch Days during Maternity Leave

You can agree to work (or attend training) for up to 10 days during your maternity leave without that work bringing your maternity leave or statutory maternity pay to an end. These are known as "keeping-in-touch" days. Any work carried out on a keeping-in-touch day will count as a whole working day and you will be paid your normal rate of pay.

We have no right to require you to carry out any work and you have no right to undertake any work during your maternity leave. Any work undertaken on keeping-in-touch days is entirely a matter for agreement between you and your line manager.

Notice for Ending Maternity Leave

You may take your full period of maternity leave entitlement and return to work at the end of the additional leave period without having to provide notice.

If you wish to return to work earlier than the end of your additional maternity leave period, you must give at least eight weeks' notice in writing to your line manager confirming the date on which you intend to return.

If you have notified us of an early return date, but subsequently change your mind about returning to work on this date, you must give notice in writing to your line manager at least eight weeks before the earlier of the date on which you intend to return and the date on which you had previously given notice to return.

Returning to Work after Maternity Leave

You have the right to resume working in the same job and on the same terms and conditions if returning to work from a period of ordinary maternity leave. If you have taken a period of additional maternity leave, you have the right to return to the same job wherever possible. However, if this is not reasonably practicable, we will offer you a suitable alternative job on terms and conditions that are no less favourable.

We will write to you as the end of your maternity leave approaches to remind you of your expected date of return and the arrangements for your first day back.

We recognise that returning to work from maternity leave after a significant period of time away from work can be challenging. We will take steps to ensure that your return to work is as smooth as possible and work will be handed back to you on a gradual basis.

What do you need to do if you decide not to come back to work?

If you decide that you do not wish to return to work, you must give written notice of resignation as soon as possible in accordance with the terms of your contract of employment. You should note that:

- if you have been paid Occupational Maternity Pay (OMP), you will have to pay it back
- depending on the timing of your maternity leave, you may have used up more of your annual leave entitlement than has been accrued at the time of resignation so you may have to pay that back
- if you have been paid SMP, that does not have to be repaid.

Requests for Flexible Working

If, following a period of maternity leave, you feel that you would benefit from a change to your working arrangement, you should make a request for flexible working in accordance with the policy in place. Although we will take all reasonable steps to accommodate a request for flexible working, the full range of flexible working options will not be appropriate for all jobs across all areas of the organisation.

Shared Parental Leave

If you and your partner meet the eligibility and notice requirements, you may choose to end your maternity leave and pay early and take shared parental leave instead. This will enable you and your partner to take it in turns to have periods of leave to care for your child, return to work while your partner takes leave, or take leave at the same time as each other.

Further information can be found in our shared parental leave policy.

Experiencing Loss

If you experience a miscarriage or sadly the loss of a child after 24 weeks or at birth, separate policies to cover parental bereavement leave are in place, supporting employees experiencing pregnancy loss and the statutory right to take time off for dependants.

Version Control:	
Document Name:	Maternity Leave Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

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Menopause Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

CDC is committed to creating an open and supportive culture. We want you to feel comfortable speaking about how menopause-related symptoms may be affecting you at work and be able to ask for the support that you need to help you manage your symptoms.

This policy sets out the rights of employees experiencing menopausal symptoms and explains the support available to them.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

Scope

This policy applies to anyone working for us. This includes employees, contractors, volunteers, interns and apprentices.

In this policy, where we refer to the menopause, we also mean the perimenopause.

Symptoms of Menopause

The menopause is a natural event during which a person stops having periods and experiences hormonal changes such as a decrease in oestrogen levels.

For some it will be medically induced. For others, it usually occurs between the ages of 45 and 55 and typically lasts between four and eight years.

However, each person's experience will differ, and menopausal symptoms can occasionally begin before the age of 40. Perimenopause, or menopause transition, begins several years before menopause. A person may start to experience menopausal symptoms during the final two years of perimenopause.

Symptoms vary greatly and can be both physical and psychological. For around a quarter of women, they are severely debilitating. Each woman will be affected in different ways and to different degrees over different periods of time. Menopausal symptoms can often indirectly affect their partners, families and colleagues as well.

- hot flushes
- night sweats
- anxiety
- dizziness

- fatigue
- memory loss
- depression
- headaches
- recurrent urinary tract infections
- joint stiffness, aches and pains
- reduced concentration and
- heavy periods.

Our Commitment to You

We are committed to ensuring that all line managers and Directors are provided with adequate training so that they are able to support individuals experiencing adverse menopausal symptoms.

Additionally, it is the responsibility of everyone throughout the business to familiarise themselves with this policy and to play a part to ensure its successful implementation.

Requesting Support

If you are finding it difficult to cope at work because of menopausal symptoms, you are encouraged to speak to your line manager. If for any reason you are unable to approach your line manager, you can speak to a Director.

We urge you to be as open as possible about any particular issues that you are experiencing or adjustments that you need to ensure that you are provided with the right level of support.

Any health-related information disclosed by you during discussions with your line manager or Director will be treated sensitively and in confidence.

Working Flexibly on a Temporary Basis

For employees eligible to request flexible working, who require a permanent change to working arrangements, they can make such a request through their manager.

However, we recognise that for individuals affected by menopausal symptoms, the option to work flexibly on a temporary (rather than permanent) basis may be appropriate. For example, this could include working from home, changing your start and finish times, changes to your work allocation or taking more frequent breaks. This is not a definitive list.

If you feel that you would benefit from a temporary change to your working arrangement on an ad hoc basis because of sleep deprivation or other symptoms that may be impacting on your performance, you should discuss and agree these with your line manager supported by the HR Business Partner.

We will try to facilitate temporary flexible working arrangements wherever this is possible and will continue to review these to ensure that they meet your needs.

Working Environment

If you feel that your working environment is exacerbating your menopausal symptoms, you should raise this with your line manager or director.

There are a range of practical adjustments that we can implement to make your working life easier, such as moving your workstation to a cooler area or providing you with a fan. If you are required to wear a uniform, we will allow flexibility where reasonable.

Quiet Place to Work

If you need time out to relax, a short break to manage any symptoms or take medication, or a quiet space to work, you should speak to your line manager who will try their best to accommodate this.

Sanitary Products

We will ensure that sanitary products are available in toilet and shower facilities.

Sickness

There is no expectation on you to work if you are unwell because of menopausal symptoms.

Unless otherwise set out in your contract, if you are sick and unable to work, you should follow the procedure set out in our sickness absence policies.

You do not have to disclose that your absence is related to the menopause if you wish to keep this private. However, we want you to feel that you can be open about the reason for your leave.

Occupational Health

In some cases, we may refer you to occupational health so that they can advise on how your symptoms are impacted at work and make recommendations on the types of adjustments that may be appropriate. Occupational health may also signpost you to external sources of help and advice.

External Sources of Help

There are various organisations that provide help and support on the menopause, including:

- Menopause matters, which provides information about the menopause, menopausal symptoms and treatment options
- the Daisy Network charity, which provides support for people experiencing premature menopause or premature ovarian insufficiency and
- the Menopause Café, which provides information about events where strangers gather to eat cake, drink tea and discuss the menopause.
- NHS information https://www.nhs.uk/conditions/menopause/
- My Menopause Doctor - empowering women with the necessary information to make informed decisions regarding the treatment options that are available. https://www.menopausedoctor.co.uk
- The Menopause Charity - a charity on a mission to bust myths, overcome ignorance and make menopause symptoms history. Supporting women and healthcare professionals with fact-based menopause research and access to the safest treatments. https://www.themenopausecharity.org

Version Control:

Document Name:	Menopause Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Parental Bereavement Leave Policy

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

At CDC, we recognise that, while dealing with any bereavement is difficult, the death of a child is among the most devastating events that an employee can ever face.

This policy sets out our commitment to supporting bereaved parents through their grief by ensuring they can take parental bereavement leave.

The policy applies to employees who suffer the loss of a child under the age of 18. This includes parents who suffer a stillbirth after 24 weeks of pregnancy.

We have a separate policy that highlights further steps we take to help bereaved employees.

Who can take Parental Bereavement Leave?

Whatever your length of service, you can take this type of leave if you are the parent of the child who has passed away, or the partner of the child's parent. In general, you can take this type of leave if you have parental responsibility for the child. This includes adoptive parents.

If you have suffered a bereavement but are unsure if you are entitled to parental bereavement leave, please contact your line manager for clarification.

What Leave a Bereaved Parent can take

You can take two weeks of parental bereavement leave. You can take the leave as:

- a single block of two weeks or
- two separate blocks of one week at different times.

You cannot take the leave as individual days.

You can take the leave at the time(s) you choose within the 56 weeks after your bereavement. You might choose, for example, to take it at a particularly difficult time such as your child's birthday.

If you have lost more than one child, you have a separate entitlement to bereavement leave for each child who has passed away.

Notice to take Parental Bereavement Leave

If you need to take parental bereavement leave within the first 56 days after your bereavement, you can take the leave straight away. You do not have to provide any notice. Please let your line manager know no later than when you are due to start work on the first day on which you wish to take leave or, if that is not feasible, as soon as you can.

To take leave more than 56 days after your bereavement, please give your line manager at least one week's notice.

Changing your Mind about taking Parental Bereavement Leave

You can cancel your planned leave and take it at a different time (within the 56 weeks after your bereavement). Where your planned leave was due to begin during the first 56 days after your bereavement, please let your line manager know you no longer wish to take it before your normal start time on the first day of the planned leave.

Where your leave was due to begin more than 56 days after your bereavement, please let your line manager know at least one week in advance that you wish to cancel it.

You cannot cancel any week of parental bereavement leave that has already begun.

Pay During Parental Bereavement Leave

Parental bereavement pay will be paid at the statutory minimum rate

To receive statutory parental bereavement pay, you must have:

- at least 26 weeks' continuous employment with us by the week before the one in which your child passed away (and still be employed by us on the date of the bereavement); and
- normal weekly earnings in the eight weeks up to the week before your bereavement of at least the lower earnings limit for national insurance contribution purposes.

If you are unsure if you are entitled to statutory parental bereavement pay, please contact your HR Business Partner who will be able to advise you.

If you qualify for statutory parental bereavement pay, you will be paid during your leave at the rate set by the Government, or at 90% of your average weekly earnings where this figure is lower. If you are not eligible, your leave will be unpaid.

You need to give us notice of the weeks for which you wish to claim statutory parental bereavement pay, via a form that [your line manager/the HR department] will ask you to sign.

You must normally sign and return the form to your line manager within 28 days of the first day for which you are claiming. However, if that is not possible, please sign and return the form as soon as you can.

All benefits will remain in place.

Rights during Parental Bereavement Leave

During your leave, all the terms and conditions of your contract except normal pay as set out above will continue.

This means that all other benefits will remain in place. For example, holiday entitlement continues to accrue. Pension contributions will continue to be paid.

Your HR department will notify you of any paperwork that needs to be completed to ensure payments are made in accordance with this policy.

Returning to Work after Parental Bereavement Leave

When you return to work after some time on parental bereavement leave, you generally have the right to return to the same job.

However, a slightly different rule applies if you return from time on bereavement leave that follows on immediately from some maternity, adoption, paternity leave or shared parental leave (taken in relation to the child who has passed away), and your total time on leave is more than 26 weeks.

In these circumstances, you have the right to return to the same job, unless this is not reasonably practical - in which case you have the right to return to a suitable and appropriate job on the same terms and conditions.

This rule also applies if your leave includes more than four weeks of ordinary parental leave (taken in relation to any child), regardless of the total length of the leave.

If you are taking parental bereavement leave, but are unsure where you stand on your return, please contact your line manager for clarification.

External Support

External sources of help and support for bereaved employees include:

- Cruse Bereavement Care / Cruse Bereavement Care Scotland, which offers support to bereaved people, for example via a telephone helpline
- Child Bereavement UK, which offers support to families when a child passes away, for example via a telephone helpline
- Marie Curie, which supports families living with a terminal illness.

Version Control:	
Document Name:	Parental Bereavement Leave Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Parental Leave Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

This policy sets out the circumstances where employees who have parental responsibilities may take unpaid time off work to look after their children who are under 18.

CDC are committed to supporting a positive work-life balance for all our employees and recognise that time with children is important. If you are eligible (see below), you can take ordinary parental leave to care for your child - this may be to look after your child during school holidays, be with them when they are unwell, or enjoy more quality time with them.

This type of parental leave may be particularly useful if you require time off to care for your child but have used up, or are not entitled to, other types of family-friendly leave (see below).

Other Types of Family-friendly Leave

Ordinary parental leave should not be confused with:

- maternity, paternity and adoption leave; or
- shared parental leave, which enables employees to end their maternity or adoption leave early, and share the untaken balance with their partner.

Who can take Ordinary Parental Leave?

You can take ordinary parental leave to care for your child if you:

- have a minimum of one year's continuous service with us by the time you take the leave; and
- have, or expect to have, parental responsibility for the child.

If you are unsure if you are entitled to ordinary parental leave, please contact your line manager.

Amount of Ordinary Parental Leave you can take

You can take up to 18 weeks' unpaid leave for each child, subject to a maximum of four weeks' leave for each child in any one-year period.

You must take ordinary parental leave in blocks of at least one week. However, if your child has a disability, you can take the leave one day at a time (please speak to your line manager to arrange this).

Your entitlement to ordinary parental leave carries over from your previous employment. This means that, if you have taken ordinary parental leave with a previous employer:

- you can take the balance with us, but you must wait until you have worked for us for at least one year; and
- we will ask you about the amount of ordinary parental leave already taken for your child with your previous employers.

If you are unsure how much ordinary parental leave you can take, please contact your line manager in the first instance.

Notice to take Ordinary Parental Leave

To take ordinary parental leave, you normally need to give your line manager at least 21 days' notice, counting back from the date on which the leave is to start. You should set out the dates on which you wish to take ordinary parental leave.

Fathers (or others who will have parental responsibility) requesting leave to begin when their child is born

You can ask for your leave to begin when your child is born, whether this is earlier or later than expected. In these circumstances, you should give your line manager at least 21 days' notice, counting back from the beginning of the expected week of childbirth.

Your notice should set out the expected week of childbirth and the length of leave you are requesting.

Adopters requesting leave to begin on the child's placement

You can ask for your leave to begin when the child is placed with you for adoption, whether this is earlier or later than expected. In these circumstances, you should give your line manager at least 21 days' notice, counting back from the beginning of the week in which the placement is expected to occur. If 21 days' notice is not possible, please give us notice as soon as you can.

Your notice should set out the week in which the placement is expected to occur and the length of leave you are requesting.

Paternity leave

If you are considering taking ordinary parental leave on the birth of your child (or if you are an adopter, the placement of the child with you for adoption), you should bear in mind that you may also be entitled to two weeks' paid paternity leave.

Paternity leave must normally be taken within 56 days of the child's birth or placement with you for adoption - please see our separate paternity leave policy.

Evidence to take Ordinary Parental Leave

Your line manager or a director will ask you for evidence to support your request for ordinary parental leave. They will normally ask to see evidence of your child's birth certificate or certificate of adoption.

Postponing your Ordinary Parental Leave

While our aim is to agree to your request for ordinary parental leave, there are circumstances in which we may need to postpone the start date. We will do this only if your absence would cause undue disruption to our organisation and will give you written notice of the postponement no more than seven days after we received your request.

However, we will never postpone your period of ordinary parental leave if the leave starts on the birth of your child or your child's placement for adoption.

If we postpone your period of ordinary parental leave, your line manager will discuss alternative dates with you to take that period of leave within six months of the first day the postponed leave was due to start.

While you are on Ordinary Parental Leave

During your leave, all the terms and conditions of your contract, except normal pay, will continue and your continuity of employment is not affected.

This means that, while sums payable by way of salary will cease, all other benefits will remain in place. Annual leave will continue to accrue in the normal way.

During your leave, you continue to be bound by the terms and conditions of your employment. In particular, you should remember that you must not disclose any confidential information/are required to obtain our written consent before working for any other employer.

Returning to work after Ordinary Parental Leave

If you take an isolated period of ordinary parental leave of four weeks or less, you are entitled to return to the same job you were doing before your absence.

You can also return to your previous job if you take a period of ordinary parental leave of four weeks or less following on immediately from a period (or consecutive periods) of maternity, adoption, paternity and/or shared parental leave (taken in relation to the same child) that did not last more than 26 weeks.

You are entitled to return to your previous job or, if that is not practical for our organisation, to another job that is both suitable and appropriate in the circumstances if you:

- take a period of ordinary parental leave of more than four weeks; or
- take a period of ordinary parental leave of four weeks or less following on immediately from a period (or consecutive periods) of maternity, adoption, paternity and/or shared parental leave (taken in relation to the same child) that lasted more than 26 weeks.

If you are taking ordinary parental leave, and are unsure where you stand on your return, please contact your line manager.

Version Control:	
Document Name:	Parental Leave Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Paternity Leave Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

This policy sets out the rights of employees to paternity leave and pay.

We are committed to supporting a positive work-life balance for all our employees and recognise that time with your children is important.

Who can take Paternity Leave?

You can take paternity leave if you:

- have at least 26 weeks' continuous employment ending with the 15th week before the expected week of childbirth
- are the biological father of a child, or the spouse, civil partner or partner of the child's mother and
- have, or expect to have, the main responsibility (apart from any responsibility of the mother) for the child's upbringing.

This means that paternity leave is available to an eligible female employee who is married to, or is the civil partner or partner of, the child's mother.

Paternity leave is also available to the spouse, civil partner or partner of an individual who has adopted a child. Where a couple adopt a child jointly, one may take adoption leave and the other paternity leave. They are entitled to choose for themselves which adoptive parent takes which type of leave.

To be eligible for paternity leave for a child adopted within the UK, you must have you: have at least 26 weeks' continuous employment by the end of the week in which the adoption agency formally notifies the adopter that they have been matched with the child.

Length and timing of Paternity Leave

An eligible employee can take either one week's leave or two consecutive weeks' leave. You cannot take paternity leave in instalments (for example as part weeks or individual days).

You can take just one period of paternity leave per pregnancy or adoption, regardless of the number of children born as a result of the pregnancy or the number of children placed under the same adoption arrangement.

You must take paternity leave within 56 days of the child's birth or, if the child is born earlier than the expected week of birth, within 56 days of the first day of the expected week of birth.

For an adopted child, you must take within 56 days of the child's placement for adoption with you (or in the case of a child adopted from overseas, within the period of 56 days beginning with the date the child entered Great Britain).

If you wish to take shared parental leave, you must take your paternity leave first. You cannot take paternity leave if you have already taken a period of shared parental leave in relation to the same child.

Notice to take Paternity Leave

To take paternity leave for a birth child, you need to give your line manager supported by the HR Business Partner at least 15 weeks' written notice of:

- the date on which your partner's baby is due
- the length of paternity leave you wish to take and
- the date on which you wish your paternity leave to start.

To take paternity leave for an adopted child, you need to give your line manager, supported by the HR Business Partner, written notice of your intention to take paternity leave no later than seven days after the date on which notification of the match with the child was given by the adoption agency. The notice must specify:

- the date on which the adopter was notified of having been matched with the child
- the date on which the child is expected to be placed for adoption
- the length of paternity leave you wish to take and
- the date on which you wish your paternity leave to start.

Changing your Paternity Leave Plans

If you wish to change the timing of your paternity leave, you must give your line manager at least 28 days' written notice of the revised start date.

Rights during Paternity Leave

During your leave, all the terms and conditions of your contract except normal pay will continue. Your Salary will be replaced by statutory paternity pay if you are eligible for it.

This means that all other benefits will remain in place. For example, holiday entitlement continues to accrue. Pension contributions will continue to be paid.

Returning to work after Paternity Leave

Following your leave, you have the right to resume working in the same job as before on terms and conditions that are no less favourable to you than the terms that would have applied had you not been absent.

Your continuity of employment is not affected.

Maternity Support Leave – what is this?

This is a benefit that applies to employees of the Company who will be providing support to a pregnant woman around the time that they are giving birth (see below for details).

Such employees are defined as being expectant fathers; partners or nominated carers. As an expectant father, you will be able to take five days' maternity support leave, paid at normal pay.

This must be combined with Paternity Leave. Therefore, you can take one week of Maternity Support Leave at full pay and one further week of Paternity Leave (if you qualify), paid at the statutory paternity pay rate. There is no required qualifying period for Maternity Support Leave.

Time off for Antenatal Care

In addition to your paternity leave, you have the right to take time off to accompany a pregnant woman with whom you are having a child at up to two antenatal appointments. You are eligible if you're the pregnant woman's husband, civil partner, or if you're living together in a long-term relationship, if you are the biological father of the expected child you are also eligible. You may be asked to make up some or all of the time taken off.

To make a request for time off to accompany someone at an antenatal appointment, you should contact your line manager.

The antenatal appointment must be made on the advice of a registered medical practitioner, midwife, or nurse. We expect that normally no more than half a day is needed for an antenatal appointment, but the leave includes the time needed to travel to the appointment and any waiting time needed at the appointment and can be for a maximum of six-and-a-half hours on each occasion.

You should endeavour to give as much notice as possible of time off required for the antenatal appointment and, wherever possible, arrange for them to be as near to the start or end of the working day as possible.

Time off to attend Adoption Appointments

If you are adopting a child, you are entitled to take time off to attend adoption appointments, which enable contact with the child (for example, to bond with them before the placement) or for any other purpose connected with the adoption (for example, to meet with the professionals involved in the care of the child).

Where you are part of a couple jointly adopting a child, the couple can elect for one of them to take paid time off to attend up to five adoption appointments. The other can elect to take unpaid time off to attend up to two adoption appointments.

To make a request for time off for an adoption appointment, you should contact your line manager.

The appointment must have been arranged by or at the request of the adoption agency. The time off must be taken before the date of the child's placement for adoption with the employee.

You should endeavour to give as much notice as possible of when you need the time off for the adoption appointment and, wherever possible, arrange them for them to be as near to the start or end of the working day as possible.

Experiencing Loss

If you experience a miscarriage or sadly the loss of a child after 24 weeks or at birth, we also have separate policies to cover parental bereavement leave, supporting employees experiencing pregnancy loss and the statutory right to take time off for dependants.

Version Control:	
Document Name:	Paternity Leave Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Performance Improvement (Capability) Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference.

As such we seek to support and empower our employees to be motivated to deliver their best. Continuous improvement and learning is incredibly important for all of us and is actively supported. So too is our value of delivering services to a consistently high standard. We do this through a variety of ways, including one to ones, team meetings, setting work-based objectives that include our strategic and operational priorities. Performance management should be a continuous cycle, not an isolated event. Employee objectives should be reviewed and amended in line with changing organisational priorities, and feedback and reviewing performance should be a regular occurrence.

Sometimes, however, for a number of reasons, performance may fall below an acceptable level. This policy should be used when improvements in performance are not achieved following informal discussions and regular feedback. Its purpose is to provide a framework for resolving poor performance in a fair and supportive manner.

Where poor performance is believed to be the result of unacceptable behaviours, or where serious errors have been made to the detriment of CDC, we may decide to use our disciplinary procedure instead.

Where it is not possible to hold a face-to-face meeting under this procedure, we will conduct the process remotely. We will ensure that you and your representatives have access to the necessary technology for participating. Your rights will not be affected, and we will ensure that the procedure remains fair and reasonable.

We will take a written record of all meetings conducted under this procedure. This will be done either by the person holding the meeting, a member of the HR Team or by an additional person arranged by us to take notes. We may digitally record any meeting conducted remotely under this procedure, provided that all parties agree. We will ensure that any such recording is made in line with our data protection obligations.

Stage 1 - Informal Meeting

Your line manager will inform you of the nature of the problem and confirm this in writing. You will be invited to an informal meeting to discuss concerns regarding your performance. The meeting will be conducted by your line manager.

Following the informal meeting, your line manager may choose to:

- take no further action
- refer the matter for investigation under the disciplinary procedure or
- issue guidance to you on what you need to do to improve your performance. For example, timekeeping, setting objectives etc. and agree a reasonable timescale within which improvement is

expected. A review meeting will be held after the agreed time has elapsed to assess if there has been sufficient improvement.

Stage 2 - Performance Improvement Meeting

Where stage 1 does not lead to a satisfactory improvement in your performance, you will be invited to a performance review meeting.

The purpose of this meeting is to discuss your performance and decide what measures should be taken to help you to improve your performance to an acceptable level. The meeting will be conducted by your line manager. You have the right to be accompanied by a work colleague or Trade Union representative or official.

At the meeting, you will be given an opportunity to ask questions, comment on the issues and put forward any explanation you may have for the matters identified by your line manager as amounting to poor performance.

The outcome of the meeting may be:

- a decision to take no further action
- a decision to refer the matter for investigation under the disciplinary procedure; or
- the implementation of a performance improvement plan (see below).

Where the decision is made to carry out further investigation under the disciplinary procedure, we will provide you with the reasons for such action.

Performance Improvement Plan

A performance improvement plan (PIP) is a series of measures designed to help you to improve your performance. We will seek to agree each measure with you but reserve the right to insist on any aspect of the performance improvement plan if agreement cannot be reached.

Each plan will be tailored to the particular situation but will cover the following elements and will be recorded in a Performance Improvement Plan (PIP): (hyperlink to the management portal). The plan will take into consideration any reasonable adjustments the employee may need and the provision of additional support, for example IT providing a screen to support a neurodiverse employee with reading on screen.

Targets

The PIP will cover the particular areas in which improved performance is needed and state the criteria on which your performance will be assessed. Where appropriate, we will set specific targets that will need to be achieved either by the end of the plan or at identifiable stages within it. The PIP will form the basis of the ongoing discussions with you and will be an active management record in determining if the required acceptable performance standards have been reached.

Timescale

The overall timescale in which the necessary improvement must be achieved should be agreed with the individual and followed up in writing. Whilst timescales may be variable, they should be realistic in terms of the task that has been set and achievable with the right support. We envisage that no performance improvement plan (PIP) should last beyond six months, unless there is good reason for it and your manager will seek guidance from the HR Business Partner throughout the process, if required.

Measures

The measures we will take to support you in improving your performance. This may include:

- training
- additional supervision
- the reallocation of certain duties and
- the provision of additional support from your colleagues. This may include coaching or mentoring from a colleague or manager or external support such as an Access to Work Assessment and the implementation of recommendations as far as feasible.

Feedback

You will be given regular feedback from your line manager indicating the extent to which you are on track to deliver the improvements set out in the plan.

If, at any stage during the plan, your line manager feels that your performance is not progressing in a satisfactory way, a further meeting may be held with you to discuss this, and where appropriate, your plan may be amended and/or extended.

Review

At the end of the plan, typically no longer than six months, your performance will be reviewed. If satisfactory progress has been made, we will confirm this in writing. If your line manager feels that satisfactory progress has not been made, your performance improvement plan (PIP) may be extended and/or amended by a further three months. Alternatively, you may be asked to attend a formal hearing under stage 3 of this procedure (see below).

Ongoing review

Following the successful completion of a performance improvement plan, your performance will continue to be monitored. If, at any stage during the following 12 months, your performance again starts to fall short of an acceptable standard, your line manager may decide to initiate stage 3 of this procedure. The informal stage includes a review period and close supervision to help support you as we would like to see you achieve a satisfactory improvement in your performance.

Stage 3 - Formal Hearing

Where stage 2 does not lead to a satisfactory improvement in your performance, you will be invited to a formal performance management hearing.

You will be informed in writing of the grounds on which the hearing is being convened. The letter will set out sufficient information and examples of why your line manager believes your performance still falls short of an acceptable standard.

The hearing will be conducted by a suitable manager or delegated person. You will be entitled to be accompanied by a fellow employee or a trade union official.

At the hearing, you will be given an opportunity to ask questions, comment on the issues and to put forward any explanation you may have for the matters identified by your line manager as amounting to poor performance.

The outcome of the meeting may be a decision to:

- take no further action
- refer the matter for investigation under the disciplinary procedure
- possible redeployment
- institute another performance improvement plan or
- issue a formal warning
- Or if appropriate, ill health retirement may be considered, if you are permanently unable to do your job, and you are not immediately capable of undertaking gainful employment.

A formal warning will be issued if it is concluded that reasonable steps have been taken that should have allowed you to perform to an acceptable standard, but that these measures have not succeeded. The warning will explain the nature of the improvement required in your performance and state the timescale for making these improvements. It will also explain that, if the necessary improvement does not take place, you may be dismissed.

The warning will remain current for a period of 12 months, after which it will cease to have effect.

Where you are issued with a formal warning in accordance with this procedure, you will have a right of appeal.

Stage 4 - Dismissal Hearing

If you have been issued with a warning under stage 3 that remains live and your line manager believes that your performance is still not acceptable, the matter may be referred to a performance dismissal hearing.

You will be informed in writing of the grounds on which the hearing is being convened. The letter will set out sufficient information and examples of why your line manager believes your performance still falls short of an acceptable standard.

The hearing will be conducted by a senior manager or another delegated person. The employee will be entitled to be accompanied by a fellow employee or trade union representative or official.

At the meeting, you will be given an opportunity to ask questions, comment on the issues and to explain any issues around your performance or mitigating circumstances.

The outcome of the meeting may be:

- a decision to take no further action
- the issuing of another performance management warning
- an offer to redeploy the employee to alternative work or
- a decision to dismiss the employee.

Any offer to redeploy you will be entirely at our discretion. Such an offer will be made only where we are confident that you will be able to perform well in the redeployed role. It will only be offered as an alternative to dismissal in circumstances where we are satisfied that you should no longer be allowed to continue to work in your current role. While you are free to refuse any offer of redeployment, the only alternative available will usually be dismissal.

If we believe that there is no alternative role available and suitable for you and that you have not met an acceptable standard of performance, you may be dismissed. A decision to dismiss will only be taken by a senior manager who has the authority to do so.

The decision to dismiss together with the reasons for dismissal will be set out in writing and sent to you. Any dismissal will be with full notice, or a payment in lieu of notice.

Where you are dismissed in accordance with this procedure, you will have a right of appeal.

Appeal

You have a right of appeal against a sanction issued under stages 3 or 4 of this procedure. A request for an appeal should be sent in writing to a senior manager within five working days of being informed of the sanction. Your letter should set out the grounds on which you believe that the decision was flawed or unfair.

An appeal hearing will be convened to consider the matter. It will be chaired by a senior manager or delegated person. You will be entitled to be accompanied by a fellow employee or a trade union official.

At the hearing, the decision to impose the sanction will be reviewed and you will be entitled to make representations about the appropriateness of that decision.

The result of the hearing will be either to confirm the sanction or substitute an outcome that was available to the panel conducting the hearing at which the sanction was imposed on you.

The outcome of the appeal will be confirmed to you in writing, usually within seven working days, explaining the grounds on which the decision was reached. The outcome of the appeal will be final.

Right to Representation

At any formal meeting you have the right to be represented by a work colleague or a Trade Union representative. However, consideration will be given to another person in exceptional circumstances.

Version Control:	
Document Name:	Performance Improvement (Capability) Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

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COTSWOLD DISTRICT COUNCIL

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Probationary Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

At CDC, we aim to create a positive working environment where everyone can fulfil their potential and perform to the best of their ability to deliver excellent service. As a new employee, we want you to thrive in your new role and we will provide you with the support and training you need to get you up to speed in your role as quickly as possible. When you start, your manager and the team will provide you with support and induction into the organisation.

This policy is intended to allow both the employee and the line manager to assess objectively whether the employee is suitable for the role. CDC believes that the use of probationary periods increases the likelihood that new employees will perform effectively in their employment.

The relevant line managers are responsible under this policy for ensuring that all new employees are properly monitored during their probationary period. If any problems arise, the line manager should address these promptly. This will ensure that the employee is aware that some aspect of their performance or conduct is unsatisfactory and prevent the problem from escalating.

Length of Probation

CDC's standard period of probation is six months. During this time your manager will have regular meetings to review how you are progressing so you will know that you are on the right track. If you aren't sure about how to do something or think you need a bit more training or support, you can ask your manager at any time. Within your first week, you will be invited to a mandatory virtual CDC welcome session.

After successful completion of your probationary period, your employment in your role will be confirmed.

Extending Probationary Periods

CDC reserves the right to extend an employee's period of probation at its discretion. This will be limited to one extension and the total period of probation will be no longer than 9 months.

An extension may be implemented in circumstances where the employee's performance during probation has not been entirely satisfactory, but it is thought likely that an extension to the probationary period may lead to an improvement, or where the employee or line manager has been absent from the workplace for an extended period during probation.

Before extending an employee's probationary period, the line manager must consult with Human Resources. If an extension to the probationary period is agreed, CDC will confirm the terms of the extension in writing to the employee, including:

- the length of the extension and the date on which the extended period of probation will end
- the reason for the extension and, if the reason is unsatisfactory performance, details of how and why performance has fallen short of the required standards
- the performance standards or objectives that the employee is required to achieve by the end of the extended period of probation
- any support, for example further training, which will be provided during the extended period of probation; and
- a statement that, if the employee does not meet fully the required standards by the end of the extended period of probation, their employment will be terminated.

Terms of employment during the Probationary Period

During the probationary period, employees will be subject to all the terms and conditions of their contracts of employment with the exception of those terms noted below:

The amount of notice that an employee must give to CDC if they wish to resign, and the amount of notice that CDC must give to the employee of dismissal are different during probation. During probation, either party may terminate the employee's contract of employment by giving one week's notice. If CDC decides to terminate the employee's employment, their employment will come to an end immediately and the employee will receive pay in lieu of the one week's notice together with any outstanding holiday pay.

Once the probationary period has been completed, the notice periods will be as defined in the employee's contract of employment.

In the case of existing employees who have been transferred or promoted into different roles, the amount of notice that the employee must give to the organisation if they wish to resign, and the amount of notice the organisation must give to the employee of dismissal will be as defined in the employee's contract of employment.

Line Managers' Responsibilities

Under this policy, the line manager has responsibility for monitoring a new employee's performance and progress during the probationary period. The line manager must ensure that the employee is properly informed at the start of their employment about what is expected of them during probation, for example the required job outputs or standards of performance.

Reviews during Probation

The line manager should review and assess the employee's performance, capability, and suitability for the role on at least a monthly basis during the employee's probation, and again at the end of the probationary period. A clear record should be made of each review meeting. A copy of the record should be passed to the employee and the original forwarded to Human Resources. CDC processes any personal data collected during the probationary period in accordance with its data protection policy.

Any data collected is held securely and accessed by, and disclosed to, individuals only for the purposes of operating the probationary period. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the CDC's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the organisation's disciplinary procedure.

During an employee's probation, the line manager should provide regular feedback to the employee about their performance and progress, and should there be any problem areas, raise these with the employee as

soon as possible with a view to resolving them. The line manager is also responsible for providing guidance and support and for identifying and arranging any necessary training or coaching.

Irregularities Discovered during the Probationary Period

If, during an employee's probation, it is suspected or established that the employee does not have the qualifications, experience, or knowledge that they claimed to have at the time of recruitment, the matter will be discussed with the employee to establish the facts. If the evidence suggests that the employee misrepresented their abilities in any way, CDC will terminate the employment.

End of Probation

Shortly before the end of the probationary period, the line manager should conduct a final review of the employee's performance and suitability for the job. This will involve a meeting with the employee to discuss their performance and progress throughout the period of probation. There should be no surprises at this meeting as there have been regular reviews. If the employee's performance is satisfactory, the line manager should notify Human Resources to issue a letter of confirmation of appointment to the employee.

If the employee's performance has not met the standards required by CDC, the line manager should discuss the matter with Human Resources before any decision is made to terminate the employee's employment.

Termination of Employment

If an employee's performance while on probation has been unsatisfactory (despite support from their line manager), and it is thought unlikely that further training or support would lead to a satisfactory level of improvement, the employment will be terminated at the end of the period of probation.

It is CDC's policy to allow the employee to complete the designated period of probation rather than terminating employment before the probation has come to an end. This is to give the employee a full opportunity to come up to the required standards. If, however, there is clear evidence prior to the end of the period of probation that suggests the employee is wholly unsuitable for the role, the line manager should consult Human Resources with a view to terminating the employee's contract early.

Where a decision is taken to terminate the employee's employment, the employee must be interviewed and informed of the reason for the termination. CDC will write to the employee confirming the termination and the reason for it. The employee will be given an opportunity to appeal the decision.

If an employee's employment is terminated after the expiry of the probationary period, or if the employee is an existing employee who has been transferred or promoted into a different role, CDC's normal capability/dismissal procedure must be followed in full.

Right to Representation

At any formal meeting you have the right to be represented by a work colleague or a Trade Union representative. However, consideration will be given to another person in exceptional circumstances.

Version Control:	
Document Name:	Probationary Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Reserved Forces and Voluntary Emergency Responders Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

CDC embraces and supports the Armed Forces Reservists (Reservists) and those who volunteer as Emergency Service Responders (Volunteers) working within our organisation. For the purpose of this policy, CDC recognises the following roles. This list is not exhaustive:

- Volunteer Reservists - civilians recruited into the Royal Naval Reserves, Royal Marines Reserves, Army Reserve and Royal Auxiliary Air Force.
- Regular Reservists - ex-regular servicemen/women who may retain a liability to be mobilised depending on how long they have served in the Armed Forces.
- Volunteer Emergency Services Responders - Community First Responder / St John's Ambulance / Special Police Constables / Search & Rescue Services/Retained Fire-Fighters.

Purpose and Scope

CDC has pledged its support for employees who are members of or those wishing to join the Reserve Forces and/or Volunteer Emergency Services and acknowledges the training undertaken by Reservists and Volunteers enables them to develop skills and abilities that are of benefit to both the individual and the organisation.

This policy defines CDC's obligations towards all employees who are Reservists and/or Volunteers
We will not disadvantage those Reservists and/or Volunteers who notify the Company of their Reserve or Volunteer status.

We shall, subject to the provisions set out in Section 4, agree to release Reservists and Volunteers for attendance at training events where these take place on an employee's normal contracted working day.
We shall, subject to the provisions set out in Appendix 1 - Mobilisation of Reservists Guidance agree to the release of all employees mobilised for Reservist duties.

Reservists and Volunteers Notification Requirement

Reservists and Volunteers are required to inform their employer that they are a member of the Reserve Forces and/or Emergency Services and the specific force/organisation that they belong to. This is so that CDC can provide the appropriate level of support to the individual.

We also recognise the additional skills and experiences that being a Reservist or Volunteer can bring to the organisation and therefore it is useful for CDC to understand where these particular skills and experiences exist.

Reservist employees are also required to grant permission for the Ministry of Defence (MoD) to write directly to their employer. This is known as 'Employer Notification' and ensures the Company is made aware that the employee is a Reservist and of the benefits, rights and obligations that apply.

It is the responsibility of the Reservist and Volunteer to ensure their personal details are kept up to date e.g. if they change employer or leave their respective Reserve Force or Emergency Service.

The individual will not be disadvantaged as a result of notifying CDC of their Reserve status.

Training Commitments and Time Off

CDC recognises the importance of the training undertaken by Reservists and Volunteers that enables them to develop skills and abilities that are of benefit to their respective Reserve Force, community, the individual and the organisation.

This includes any period of training. Typical training may involve:

- Weekly training - most Reservists/Volunteers train at their local centre for around two-and-a-half hours, one evening a week.
- Weekend training – most Reservists/Volunteers are expected to attend a number of training weekends which take place throughout the year.
- Annual training – all Reservists are expected to attend a 1–2-week annual training course sometimes referred to as 'annual camp'. This may take place at a training establishment, as an attachment to a Regular Unit, as a training exercise or a combination of any of these. Training normally takes place within the UK, although each year some Reservists train overseas.

Legally employers are not obliged to grant leave for attending training, however, CDC is committed to granting additional paid leave of up to two weeks (10 days) pro-rata per year to employees who are Reservists and/or Volunteers specifically to enable them to attend their annual camp and/or training days throughout the year.

Reservist and Volunteer employees are asked to give as much notice as possible to their Line Manager of the training commitments to allow appropriate planning for absences. Permission once given will not be rescinded unless there are exceptional circumstances. The permitted time off will be recorded on Business World against reason code RESFORCE.

Appendix One - Mobilisation of Reservists Guidance

Mobilisation is the process of calling Reservists into full time service with the Regular Forces to make them available for military operations. The maximum period of mobilisation will depend on the scale and the nature of the operation and is typically no longer than 12 months.

The Call-out papers for mobilisation are sent by post to the organisation or sometimes delivered in person by the Reservist to their line manager. The documentation will include the call-out date and the anticipated timeline. Whenever possible, Defence aims to give at least 28 days' notice of the date that a Reservist will be required to report for mobilisation, although there is no statutory requirement for a warning period prior to mobilisation.

A period of mobilisation comprises three distinct phases:

- Medical and pre-deployment training
- Operational tour
- Post-operational tour leave

Pre-mobilisation

- Meet with Reservist to ensure all mobilisation paperwork is completed (including pay, benefits and pension arrangements)
- Make a claim for financial assistance as appropriate (see s.10 of policy)
- Discuss any handover of work and return of equipment
- Arrangements for keeping in touch
- Refer to checklists in Line Manager and Reservist Guidance document

During mobilisation

- Keep in touch with Reservist as arranged post-mobilisation
- Ensure both employer and reservist fulfil their return-to-work obligations (include link to template letters)
- After care and support requirements

Applying for Exemption/Deferral/Revocation

In all cases of mobilisation, CDC will release the Reservist to report for duty unless there are exceptional circumstances, whereby the decision and reasoning will be explained to the Reservist.

In such circumstances, line managers have the right to seek exemption and should refer the matter to the appropriate director for a decision if the Reservist's absence is considered to cause serious harm to service delivery.

Definitions of 'harm' will vary from case to case, but may include;

- loss of reputation, goodwill or other financial harm
- impairment of the ability to produce goods or provide services
- harm to the research and development of new products, services or processes (which could not be prevented by the granting of financial assistance under sections 83 and 84 of The Reserve Forces Act 1996).

Details of how to apply for exemption are included in the call-out pack. The application must reach the Adjudication Officer within 7 days of the Company receiving a call-out notice. If this timescale is not met permission to make a late application will need to be obtained from the Adjudication Officer. The Reservist also has the right to apply for exemption or deferral if the call-out papers arrive at a difficult time

If an unsatisfactory decision is received following the application for a deferral, the Company can appeal for a hearing by the Reserve Forces Appeals Tribunal. Appeals must reach the Tribunals Secretary within 5 days receipt of written notice of the decision. If the tribunal rejects the application for exemption or deferral, the Company will be required to release the Reservist for mobilisation.

Treatment of Terms and Conditions during Mobilisation

CDC will continue to treat the contracts of employment of employees mobilised for Reserve Service as operable throughout the period of such service. There will be no loss of continuous service or service-related benefits, although some other benefits may be suspended. Under The Reserve Forces Act (Safeguarding of Employment) Act 1985, an employee's service is terminated on mobilisation, but providing the employee follows the correct notification procedure under the Act, he or she can return to employment and their continuity of service will be restored.

Pay

The MoD will assume responsibility for the Reservist's salary for the duration of their mobilisation. They will pay a basic salary according to the Reservist's military rank. If this basic element is less than the salary the

Reservist receives from CDC, it is the Reservist's responsibility to apply to the MoD for the difference to ensure that they suffer no loss of earnings. This is known as a Reservist Award.

Where mobilisation occurs, the employee will be given special unpaid leave of absence.

CDC is not required to pay the Reservist's salary during the period of mobilisation.

Benefits

Contractual benefits that are suspended by the Company during mobilisation can be claimed by the Reservist as part of their Reservist Award. Example benefits include:

- All those benefits available at the time on the Portal

The Line Manager and Reservist should discuss benefit arrangements during the pre-mobilisation meeting.

This should cover those benefits that will be suspended and for any continuing benefits, arrangements should be made as to how these are paid.

Pension

If the Reservist is a member of the Local Government Pension Scheme (LGPS) CDC will continue to run the pension scheme and make the employer contribution. If the Reservist decides to stay in the scheme and contributes personally, the MoD will contribute as the employer during the mobilization time, as long as the Reservist also keeps contributing.

Annual Leave

Reservists should be encouraged to take any accrued annual leave before mobilisation. CDC is not obliged to accrue annual leave for a Reservist employee during the period of mobilisation. Reservists accrue annual leave with the MoD whilst they are in full time service. When they demobilise, Reservists are entitled to a period of post-operational leave (POL). During this period, they will continue to be paid by the MoD.

CDC employees are entitled to carry over up to 5 days leave from one holiday year to the next i.e. the annual holiday year is from 1st April to 31st March.

Dismissal/Redundancy

A Reservist's employment cannot be terminated on the grounds of their military duties or their liability to be mobilised. To do so would be a criminal offence under s.17 of The Reserve Forces (Safeguarding of Employment) Act 1985.

Reservists can be included in the redundancy pool if this is necessary due to a downturn in business or closure of a department. However, all employees should be treated consistently, and redundancy criteria should not discriminate against Reservists on the grounds of their Reserve service or call-up liability.

Sick Pay

During the period of mobilisation, the Reservist will continue to accrue any rights to service-related CDC sick pay. Should a Reservist become sick or injured during mobilisation they will be covered by Defence Medical Services and any financial assistance will continue to be received (including pay) until demobilised. If the sickness or injury continues and this results in early demobilisation, the Reservist will remain covered by Defence until the last day of paid military leave.

After this time the Reservist will be covered by the current CDC Sickness arrangements (in line with local policy).

If the Reservist becomes ill post mobilisation, and a notional return to work date has been agreed, they will be covered by CDC Sickness arrangements as per the CDC Sickness Policy.

Return to work

Both the Reservist and their employer have obligations under The Reserve Forces (Safeguarding of Employment Act) 1985 regarding the return-to-work process.

Reservist

The Reservist must write to their employer by the third Monday after their last day of military service making their request to return to work and suggesting a date which should fall within 6 weeks of their last day of full-time service. This letter formally starts the return-to-work process.

They are also encouraged to informally contact the employer, via a letter, a meeting or a telephone call to discuss their return to work at the earliest opportunity, The formal application must be made in writing for it to be valid under the Act.

If a Reservist is not happy with the offer of alternative employment, they must write to the employer stating why there is reasonable cause for them not to accept it. If a Reservist believes that an employer's response to their application denies their rights under the Safeguard of Employment Act 1985, an application can be made to a Reinstatement Committee for assessment. This committee will consider the Reservist's application and can make an order for reinstatement and/or compensation.

Employer

CDC has an obligation under Reserve Forces (Safeguarding of Employment) Act 1985 to reinstate the Reservist, where possible to their former role, and if not, to a mutually acceptable role on the same terms and conditions prior to mobilisation.

The Reservist should be reinstated within 6 weeks of the last day of their full-time service. They must be reinstated for a minimum period of 13, 26 or 52 weeks, depending on their length of service prior to mobilisation.

Sometimes Reservists may need refresher training when they return to work or be given time to familiarise themselves with processes and procedures in the workplace. Financial assistance may be available for retraining if it is required as a direct result of their mobilisation, although applications cannot be made for training courses that would have taken place anyway. Evidence of costs will be required in addition to evidence that the Reservist could not reach the required standard by any other means, such as workplace experience.

Aftercare

A Reservist returning to work will benefit from a smooth reintegration into the workplace/team. The following should be considered as part of this process:

- The need to update on changes and developments in the organisation.
- The need to offer specific refresher training where it is sought/considered necessary.
- Where the job duties have changed since mobilisation a period of skills training may be required to assist with new aspects of the job.
- Whether the reservist can meet up with colleagues informally or socially before or after their return to work to prevent any feeling of dislocation, if this is sought.
- Reasonable time off to seek therapeutic treatment if required.

Performance Review

Line managers who carry out Performance Review meetings with a Reservist should be aware that Reserve Forces activities undertaken by an individual (either through training or mobilisation) bring essential skills into the workplace such as leadership, communication, team working and organisational ability, which ultimately lead to improved performance in the workplace.

Financial Assistance

Financial assistance for employers in the event of an employee who is a Reservist being mobilised is governed by the Reserve Forces (Call out and recall) (Financial Assistance) Regulations 2005. These cover additional costs above the normal earnings of the called-up Reservist associated with replacing that employee. There are 3 types of awards available:

One-off Costs

- Agency fees, if a recruitment agency or employment agency is used to find a temporary replacement; or advertising costs
- No financial cap on claims, but any claim must be supported by relevant documentation

Recurring Costs

- Overtime costs, if other employees work overtime to cover the work of the Reservist [by the amount that such costs exceed earnings of the Reservist]
- Costs of temporary replacement [by the amount that such costs exceed earnings of the Reservist]

The maximum claim available is £110 per day (£40,000 per annum correct at 2/09/2021, but may be subject to change). Claims can be made for every normal working day that the Reservist is away on service. An application for one-off costs and recurring costs must be made within 4 weeks of the end of full time Reservist service.

Training Award

If a returning Reservist has to undertake additional training as a direct result of their mobilisation (routine training excluded), then the Company can make an application for the financial assistance.

Version Control:	
Document Name:	Reserved Forces and Voluntary Emergency Responders Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Shared Parental Leave (Adoption) Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best

This policy sets out the rights of employees to shared parental leave and pay following the adoption of a child. If you or your partner is pregnant or has recently given birth, please refer to our Shared parental leave (birth) policy.

Shared parental leave should not be confused with ordinary parental leave, which is the separate entitlement to up to 18 weeks' unpaid leave.

The following definitions are used in this policy:

"**Adopter**" means the person with whom the child has been or is to be placed for adoption, or where two people have been matched jointly, whoever has elected to be the child's adopter for the purposes of adoption leave.

"**Partner**" means the person who is married to, or the civil partner or the partner of, the adopter at the date on which the child is placed for adoption (or for adoptions from overseas, at the date on which the child enters Great Britain). This includes someone, of whatever sex, who lives with the adopter and the child in an enduring family relationship but who is not the adopter's child, parent, grandchild, grandparent, sibling, aunt, uncle, niece or nephew.

"**Matched for adoption**" means an adoption agency deciding that a person would be a suitable adoptive parent for a child either individually or jointly with another person. A person is notified of having been "matched for adoption" with a child on the date on which the person receives notification of the adoption agency's decision.

"**Placed for adoption**" means placed for adoption under UK adoption laws, including placement with a local authority foster parent who is also a prospective adopter ("foster to adopt").

"**Official notification**" means written notification, issued by or on behalf of the relevant domestic authority, that it is prepared to issue, or has already issued, a certificate to the overseas authority concerned with the adoption of the child, confirming that the adopter is eligible to adopt and has been assessed and approved as being a suitable adoptive parent.

The policy does not form part of your contract of employment and we reserve the right to amend it at any time.

Scope

This policy applies to all employees employed by us, whether they are the adopter or the partner. It does not apply to contractors, volunteers or interns working for CDC.

How does Shared Parental Leave Work?

Shared parental leave enables an adopter to end their adoption leave early and share the remaining weeks of leave with a partner. It is aimed at giving parents more flexibility over how they share childcare between them during the first year of their child's adoption.

Shared parental leave can be taken at the same time as an eligible adopter/partner or separately.

Leave must be taken in blocks of at least one week.

You can request to take shared parental leave in one continuous block, in which case we must accept your request as long as you are entitled to shared parental leave and meet the notice requirements. Alternatively, you can request to take shared parental leave in a number of discontinuous blocks of leave, separated by periods of work, in which case your line manager's agreement should be sought in advance.

Entitlement to Shared Parental Leave if you are the Adopter

If you are an adopter, you are entitled to Shared Parental Leave if:

- you have at least 26 weeks' continuous employment with us at the end of the week in which you were notified of being matched with the child for adoption (or for adoptions from overseas, at the end of the week in which you received the official notification)
- you remain in continuous employment with us until the week before any period of shared parental leave that you take
- you have main responsibility for the care of the child at the date of the child's placement apart from the partner (or for adoptions from overseas, at the date on which the child enters Great Britain);
- you are entitled to statutory adoption leave in respect of the child
- you have brought your statutory adoption leave to an end by giving an adoption leave curtailment notice (or returned to work before the end of your statutory adoption leave period) and
- you have complied with the relevant notice and evidential requirements set out in this policy.

In addition, the partner must:

- have been employed or been a self-employed earner for at least 26 of the 66 weeks immediately preceding the week in which the adopter was notified of being matched with the child for adoption (or for adoptions from overseas, the week in which the child enters Great Britain)
- have average weekly earnings of at least the maternity allowance threshold in any 13 of those 66 weeks and
- have main responsibility for the care of the child at the date of the child's placement apart from the adopter (or for adoptions from overseas, at the date on which the child enters Great Britain).

Entitlement to Shared Parental Leave if you are the Partner

If you are a partner, you are entitled to Shared Parental Leave if:

- you have at least 26 weeks' continuous employment with us at the end of the week in which the adopter was notified of being matched with the child for adoption (or for adoptions from overseas, at the end of the week in which the adopter received the official notification)

- you remain in continuous employment with us until the week before any period of shared parental leave that you take
- you have main responsibility for the care of the child at the date of the child's placement apart from the adopter (or for adoptions from overseas, at the date on which the child enters Great Britain) and
- you have complied with the relevant notice and evidential requirements set out in this policy.

In addition, the adopter must:

- have been employed or been a self-employed earner for at least 26 of the 66 weeks immediately preceding the week in which they were notified of being matched with the child for adoption (or for adoptions from overseas, the week in which the child enters Great Britain)
- have average weekly earnings of at least the maternity allowance threshold in any 13 of those 66 weeks
- have main responsibility for the care of the child at the date of the child's placement apart from the adopter (or for adoptions from overseas, at the date on which the child enters Great Britain)
- be entitled to statutory adoption leave or statutory adoption pay in respect of the child and
- have brought their statutory adoption leave to an end by giving an adoption leave curtailment notice (or returned to work before the end of their statutory adoption leave period).

Amount of Shared Parental Leave available

The amount of shared parental leave that you can split between you is 50 weeks, minus the amount of adoption leave taken by the adopter.

If you are an adopter, you cannot start a period of shared parental leave until at least two weeks of adoption leave has been taken by you.

If you are a partner, you can begin a period of shared parental leave at any time from the date of the child's placement (or for adoptions from overseas, at any time from the date on which the child enters Great Britain). However, you are entitled to take up to two weeks' paternity leave following the adoption of your child, which you will lose if shared parental leave is taken first.

All shared parental leave must be taken within the first 52 weeks of the date of the child's placement (or for adoptions from overseas, within 52 weeks of the date on which the child enters Great Britain).

Notice Requirements

If you wish to take shared parental leave, you must ensure that you submit the required notices to your line manager within the timescales set out in this policy. The notices are:

- adoption leave curtailment notice (if you are the adopter);
- notice of entitlement and intention; and
- period of leave notice.

The notice periods set out in this policy are the minimum required by law. However, the earlier you inform us of your intentions, the more likely it is that we will be able to accommodate your wishes, particularly if you want to take periods of discontinuous leave.

If you have already decided the pattern of shared parental leave that you would like to take, you can provide more than one type of notice at the same time.

Adoption Leave Curtailment Notice

If you are the adopter who is employed by us, you must give your line manager an adoption leave curtailment notice (unless you have already returned to work from adoption leave). This is for you to confirm the date on which you intend to end your adoption leave.

Your notice must be received by us at least eight weeks before you or your partner intend to start the first period of shared parental leave.

You should submit your notice using Form for adopter Inset link to curtail adoption leave.

Additionally, you must at the same time submit either:

- Form for adopter (link) to provide notice of entitlement and intention (adoption within UK) / Form for adopter to provide notice of entitlement and intention (adoption from overseas) - if you intend to take the first period of shared parental leave, or you and the partner intend to take it together (see Notice of entitlement and intention below) or
- Form for adopter (link) to provide declaration of consent and entitlement - if your partner will be taking the first period of shared parental leave alone.

If you are the partner who is employed by us, you cannot take shared parental leave until the adopter has given an adoption leave curtailment notice to their own employer or returned to work before the end of their statutory adoption leave period.

Revoking your adoption leave curtailment notice:

We urge you to think carefully before submitting your adoption leave curtailment notice.

Once an adoption leave curtailment notice is submitted, you can only revoke it if:

- you discover that neither you nor the partner are entitled to shared parental leave or statutory shared parental pay and you withdraw your notice in writing within eight weeks of the date on which it was submitted or
- the partner has died.

If you wish to revoke your notice, you will need to complete Form for adopter to revoke notice curtailing their adoption leave for purpose of shared parental leave and give this to your line manager.

Notice of Entitlement and Intention

Before you can book a period of shared parental leave, you must give your line manager a notice of entitlement and intention. This is for you to declare that you are entitled to shared parental leave and confirm that you intend to take it.

Your notice must be received by us at least eight weeks before you intend to start the first period of leave.

If you are the adopter who is employed by us, you should submit your notice using Form for adopter to provide notice of entitlement and intention (adoption within UK) or Form for adopter to provide notice of entitlement and intention (adoption from overseas).

If you are the partner who is employed by us, you should submit your notice using Form for partner to provide notice of entitlement and intention (adoption within UK) or Form for partner to provide notice of entitlement and intention (adoption from overseas).

These forms contain declarations that will need to be signed by both the adopter and the partner.

Varying or cancelling the dates in your notice of entitlement and intention

You can vary or cancel the proposed shared parental leave dates set out in your notice of entitlement and intention by providing us with written notice.

To do this, you will need to complete Form for employee to vary notice of entitlement and intention to take shared parental leave (adoption) and give this to your line manager.

Limit on number of variations in the notice of entitlement and intention

There is no limit on the number of variations that you can make as a notice of entitlement and intention is non-binding until you submit a period of leave notice.

Period of Leave Notice

Once you have provided a notice of entitlement and intention, you must also provide your line manager with a period of leave notice. This is for you to book each period of shared parental leave that you wish to take.

Your notice must be received by us at least eight weeks before you start the first period of leave. It may be given at the same time as your notice of entitlement and intention.

You should submit your notice using Form for adopter to provide period of leave notice (adoption within UK) or Form for adopter to provide period of leave notice (adoption from overseas).

Your period of leave notice may state the start and end dates for each period of leave that you wish to take. If your child has not yet been placed for adoption, your notice may state that you would like your shared parental leave to start either on the day on which your child is placed for adoption, or a specified number of days after the child's placement. Likewise, for adoptions from overseas, if your child has not yet entered Great Britain, your notice may state that you would like your shared parental leave to start either on the day on which your child enters Great Britain, or a specified number of days after your child enters Great Britain.

Shared parental leave must be booked in blocks of at least one week. You can book one continuous period of leave; in which case we must accept your request as long as you are entitled to shared parental leave and meet the notice requirements. Alternatively, you can book discontinuous periods of leave, separated by periods of work, in which case we will consider your request but reserve the right to refuse it (see booking discontinuous leave below).

Varying or cancelling the dates in your period of leave notice

You can vary or cancel the shared parental leave dates in your period of leave notice by providing us with notice at least eight weeks before any period of leave varied or cancelled is due to start.

To do this, you will need to complete Form for employee to vary period of leave notice to take shared parental leave (adoption) and give this to your line manager.

Limit on number of period of leave notices

You can submit three period of leave notices per adoption. However, any notice to vary or cancel the dates in your period of leave notice will count towards this total.

Booking Continuous Leave

If you submit a period of leave notice requesting a continuous period of leave, we must accept your request as long as you are entitled to shared parental leave and meet the notice requirements.

Booking Discontinuous Leave

If you submit a period of leave notice requesting discontinuous periods of leave, separated by periods of work, we will consider your request but reserve the right to refuse it.

In such cases, your line manager will start a two-week discussion period with you.

Your line manager may agree to your request, refuse your request, or propose alternative dates.

If agreement cannot be reached within that two-week period, you may take the leave as one continuous period of leave on:

- the start date given in your original period of leave notice or
- a new start date that is at least eight weeks after the start date given in your original period of leave notice (in which case you must notify your line manager of that new start date within five days of the end of the two-week discussion period).

Alternatively, if you withdraw your period of leave notice on or before the 15th day after the notice was submitted, it will not count towards the limit on the number of period of leave notices that you are entitled to submit and you may submit a new period of leave notice.

Request for Further Information

We may, within 14 days of receiving your notice of entitlement and intention, ask you to provide:

- evidence in the form of one or more documents issued by the adoption agency confirming the name and address of the agency, the date on which the adopter was notified of having been matched with the child, and the expected date of placement; or
- a copy of the official notification; and
- the name and address of the adopter or partner's employer (or a declaration that they have no employer).

You must provide this information within 14 days of our request.

Shared Parental Pay

Statutory shared parental pay is available for an eligible adopter and partner to share between them while on shared parental leave.

The number of weeks' statutory shared parental pay available will depend on how much statutory adoption pay the adopter has been paid when their adoption leave or pay period ends.

A total of 39 weeks' statutory adoption pay is available to the adopter. The first two weeks of adoption leave are allocated to the adopter. This means that an adopter who ends their adoption leave at the earliest opportunity could share up to 37 weeks' statutory shared parental pay with a partner.

Any statutory shared parental pay due during shared parental leave will be paid at a rate set by the Government for the relevant tax year, or at 90% of your average weekly earnings (whichever is lower).

It is up to the adopter and partner as to who is paid the statutory shared parental pay and how it is allocated between them. If you intend to receive statutory shared parental pay, you should give notice at the same time that you submit your notice of entitlement and intention.

Entitlement to Shared Parental Pay if you are the Adopter

If you are an adopter, you are entitled to Shared Parental Pay if:

- you have at least 26 weeks' continuous employment with us at the end of the week in which you were notified of being matched with the child for adoption (or for adoptions from overseas, at the end of the week in which you received the official notification)
- you remain in continuous employment with us until the week before any period of shared parental pay begins
- your average weekly earnings for a period of eight weeks ending with the week in which you were notified of being matched with the child (or for adoptions from overseas, ending with the week in which you received the official notification) are not less than the lower earnings limit for national insurance contributions
- you have main responsibility for the care of the child at the date of the child's placement (or for adoptions from overseas, at the date on which the child enters Great Britain) apart from the partner
- you are absent from work and intend to care for the child during each week in which you receive statutory shared parental pay
- you are entitled to statutory adoption pay in respect of the child, but the adoption pay period has been reduced and
- you have complied with the relevant notice and evidential requirements set out in this policy.

In addition, the partner must:

- have been employed or been a self-employed earner for at least 26 of the 66 weeks immediately preceding the week in which the adopter was notified of being matched with the child for adoption (or for adoptions from overseas, the week in which the child enters Great Britain)
- have average weekly earnings of at least the maternity allowance threshold in any 13 of those 66 weeks and
- have main responsibility for the care of the child at the date of the child's placement (or for adoptions from overseas, at the date on which the child enters Great Britain) apart from the adopter.

Entitlement to Shared Parental Pay if you are the Partner

If you are a partner, you are entitled to Shared Parental Pay if:

- you have at least 26 weeks' continuous employment with us at the end of the week in which the adopter was notified of being matched with the child for adoption (or for adoptions from overseas, at the end of the week in which the adopter received the official notification)
- you remain in continuous employment with us until the week before any period of shared parental pay begins
- your average weekly earnings for a period of eight weeks ending with the week in which the adopter was notified of being matched with the child (or for adoptions from overseas, ending with the week in which the adopter received the official notification) are not less than the lower earnings limit for national insurance contributions

- you have main responsibility for the care of the child at the date of the child's placement (or for adoptions from overseas, at the date on which the child enters Great Britain) apart from the adopter
- you are absent from work and intend to care for the child during each week in which you receive statutory shared parental pay and
- you have complied with the relevant notice and evidential requirements set out in this policy.

In addition, the adopter must:

- have been employed or been a self-employed earner for at least 26 of the 66 weeks immediately preceding the week in which they were notified of being matched with the child for adoption (or for adoptions from overseas, the week in which the child enters Great Britain)
- have average weekly earnings of at least the maternity allowance threshold in any 13 of those 66 weeks
- have main responsibility for the care of the child at the date of the child's placement (or for adoptions from overseas, at the date on which the child enters Great Britain) apart from the adopter and
- be entitled to statutory adoption pay in respect of the child, but the adoption pay period has been reduced.

Your Rights during Shared Parental Leave

During shared parental leave, all the terms and conditions of your contract except normal pay will continue. Your pay will be replaced with statutory shared parental pay if you are eligible for it. However, other benefits such as holiday entitlement and pension contributions will continue as set out below.

Holiday Entitlement

You will continue to accrue your holiday entitlement during your shared parental leave.

You should make every effort to take any outstanding holiday entitlement before commencing shared parental leave or immediately after your shared parental leave has ended if your leave is likely to extend into the next holiday year. Any holiday entitlement that has not been taken because of shared parental leave may be carried over into the next holiday year with the agreement of your line manager or director.

Pension Contributions

We will continue to make pension contributions based on your normal pay during any period of paid shared parental leave. The contributions that you make will be based on the actual pay that you receive during your shared parental leave.

Our pension contributions will cease during any period of unpaid shared parental leave.

Contact during Shared Parental Leave

We reserve the right to maintain reasonable contact with you during your shared parental leave. This may be to discuss your plans for returning to work, to discuss any special arrangements to be made or training to be given to ease your return to work, or to update you on developments at work during your absence.

Shared Parental Leave Keeping in Touch Days

You can agree to work (or attend training) for up to 20 days during shared parental leave without that work bringing your shared parental leave period or statutory shared parental pay to an end. These are known as "shared-parental-leave-in-touch" (SPLIT) days.

SPLIT days are in addition to the 10 keeping-in-touch days available to an adopter during adoption leave. Any work carried out on a SPLIT day will count as a whole working day and you will be paid your normal rate of pay.

We have no right to require you to carry out any work and you have no right to undertake any work during your shared parental leave. Any work undertaken on SPLIT days is entirely a matter for agreement between you and your line manager.

Returning to Work following Shared Parental Leave

You have the right to resume working in the same job and on the same terms and conditions when returning to work from shared parental leave if the period of leave when added to any other period of shared parental leave, statutory adoption or paternity leave taken by you in relation to the child is 26 weeks or less.

Whenever feasible, you can go back to your original job after taking shared parental leave. This applies if your total leave, including shared parental, statutory maternity, or paternity leave, is over 26 weeks. But if this isn't practical, we'll provide a suitable alternative role with terms and conditions that are no less favourable.

If you decide that you do not wish to return to work, you must give written notice of resignation as soon as possible in accordance with the terms of your contract of employment.

Version Control:	
Document Name:	Shared Parental Leave (Adoption) Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

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COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Shared Parental Leave (Birth) Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

This policy sets out the rights of employees to shared parental leave and pay following the birth of their child. If you are adopting a child, please refer to our shared parental leave adoption policy.

Shared parental leave should not be confused with ordinary parental leave, which is the separate entitlement to up to 18 weeks' unpaid leave.

The following definitions are used in this policy:

"**Mother**" means the mother or expectant mother of the child.

"**Partner**" means the father of the child, or the person who, at the date of the child's birth, is married to, the civil partner of, or the partner of the mother. This includes someone, of whatever sex, who lives with the mother and the child in an enduring family relationship but who is not the mother's child, parent, grandchild, grandparent, sibling, aunt, uncle, niece or nephew.

"**Expected week of childbirth**" means the week, starting on a Sunday, during which the mother's doctor or midwife expects them to give birth.

"**Qualifying week**" means the 15th week before the expected week of childbirth.

The policy does not form part of your contract of employment and we reserve the right to amend it at any time.

Scope

This policy applies to all employees employed by us, whether they are the mother or the partner. It does not apply to contractors, volunteers or interns working for us.

How does Shared Parental Leave Work?

Shared parental leave enables a mother to end their maternity leave early and share the remaining weeks of leave with a partner. It is aimed at giving parents more flexibility over how they share childcare between them during the first year of their child's life.

Shared parental leave can be taken at the same time as an eligible mother/partner or separately.

Leave must be taken in blocks of at least one week.

You can request to take shared parental leave in one continuous block, in which case we must accept your request as long as you are entitled to shared parental leave and meet the notice requirements. Alternatively, you can request to take shared parental leave in a number of discontinuous blocks of leave, separated by periods of work, in which case your line manager's agreement should be sought..

Entitlement to Shared Parental Leave if you are the Mother

If you are a mother, you are entitled to Shared Parental Leave if:

- you have at least 26 weeks' continuous employment with us at the end of the qualifying week;
- you remain in continuous employment with us until the week before any period of shared parental leave that you take
- you have main responsibility for the care of the child at the date of the child's birth (apart from the partner)
- you are entitled to statutory maternity leave in respect of the child
- you have brought your statutory maternity leave to an end by giving a maternity leave curtailment notice (or returned to work before the end of your statutory maternity leave period) and
- you have complied with the relevant notice and evidential requirements set out in this policy.

In addition, the partner must:

- have been employed or been a self-employed earner for at least 26 of the 66 weeks immediately preceding the expected week of childbirth
- have average weekly earnings of at least the maternity allowance threshold in any 13 of those 66 weeks and
- have main responsibility for the care of the child at the date of the child's birth (apart from the mother).

Entitlement to Shared Parental Leave if you are the Partner

If you are a partner, you are entitled to Shared Parental Leave if:

- you have at least 26 weeks' continuous employment with us at the end of the qualifying week
- you remain in continuous employment with us until the week before any period of shared parental leave that you take
- you have main responsibility for the care of the child at the date of the child's birth (apart from the mother) and
- you have complied with the relevant notice and evidential requirements set out in this policy.

In addition, the mother must:

- have been employed or been a self-employed earner for at least 26 of the 66 weeks immediately preceding the expected week of childbirth
- have average weekly earnings of at least the maternity allowance threshold in any 13 of those 66 weeks
- have main responsibility for the care of the child at the date of the child's birth (apart from the partner)
- be entitled to statutory maternity leave, statutory maternity pay or maternity allowance in respect of the child and
- have brought their statutory maternity leave to an end by giving a maternity leave curtailment notice (or returned to work before the end of their statutory maternity leave period).

Amount of Shared Parental Leave Available

The amount of shared parental leave that you can split between you is 52 weeks, minus the amount of maternity leave taken by the mother.

If you are a mother, you must take compulsory maternity leave immediately after the child is born. This means that you cannot start your shared parental leave until two after the birth of your child.

If you are a partner, you can begin a period of shared parental leave at any time from the date of the child's birth. However, you are entitled to take up to two weeks' paternity leave following the birth of your child, which you will lose if shared parental leave is taken first.

All shared parental leave must be taken within the first 52 weeks following the birth of the child.

Notice Requirements

If you wish to take shared parental leave, you must ensure that you submit the required notices to your line manager copied to the HR Team within the timescales set out in this policy. The notices are:

- maternity leave curtailment notice (if you are the mother)
- notice of entitlement and intention; and
- period of leave notice.

The notice periods set out in this policy are the minimum required by law. However, the earlier you inform us of your intentions, the more likely it is that we will be able to accommodate your wishes, particularly if you want to take periods of discontinuous leave.

If you have already decided the pattern of shared parental leave that you would like to take, you can provide more than one type of notice at the same time.

Maternity Leave Curtailment Notice

If you are the mother who is employed by us, you must give your line manager a maternity leave curtailment notice (unless you have already returned to work from maternity leave). This is for you to confirm the date on which you intend to end your maternity leave.

Your notice must be received by us at least eight weeks before you or your partner intend to start the first period of shared parental leave.

Additionally, you must at the same time submit either:

- Form for mother (link) to provide notice of entitlement and intention to take shared parental leave - if you intend to take the first period of shared parental leave, or you and the partner intend to take it together (see Notice of entitlement and intention below) or
- Form for mother (link) to provide declaration of consent and entitlement - if your partner will be taking the first period of shared parental leave alone.

If you are the partner who is employed by us, you cannot take shared parental leave until the mother has given a maternity leave curtailment notice to their own employer or returned to work before the end of their statutory maternity leave period.

Revoking your maternity leave curtailment notice

We urge you to think carefully before submitting your maternity leave curtailment notice.

Once a maternity leave curtailment notice is submitted, you can only revoke it if:

- you discover that neither you nor the partner are entitled to shared parental leave or statutory shared parental pay and you withdraw your notice in writing within eight weeks of the date on which it was submitted
- notice was given before the birth of the child and you withdraw your notice in writing within six weeks of the child's birth or
- the partner has died.

If you wish to revoke your notice, you will need to notify your line manager, with a copy to the HR Team as soon as possible.

Notice of Entitlement and Intention

Before you can book a period of shared parental leave, you must give your line manager a notice of entitlement and intention. This is for you to declare that you are entitled to shared parental leave and confirm that you intend to take it.

Your notice must be received by us at least eight weeks before you intend to start the first period of leave.

If you are the mother who is employed by us, you should submit your notice using Form for mother to provide notice of entitlement and intention to take shared parental leave.

If you are the partner who is employed by us, you should submit your notice using Form for partner to provide notice of entitlement and intention to take shared parental leave.

These forms contain declarations that will need to be signed by both the mother and the partner.

Varying or cancelling the dates in your notice of entitlement and intention

You can vary or cancel the proposed shared parental leave dates set out in your notice of entitlement and intention by providing us with written notice.

To do this, you will need to complete a 'Form for employee' to vary notice of entitlement and intention to take shared parental leave and give this to your line manager.

Limit on number of variations in the notice of entitlement and intention

There is no limit on the number of variations that you can make as a notice of entitlement and intention is non-binding until you submit a period of leave notice.

Period of Leave Notice

Once you have provided a notice of entitlement and intention, you must also provide your line manager with a period of leave notice. This is for you to book each period of shared parental leave that you wish to take.

Your notice must be received by us at least eight weeks before you start the first period of leave. It may be given at the same time as your notice of entitlement and intention.

Your period of leave notice may state the start and end dates for each period of leave that you wish to take. Alternatively, if your child has not been born yet, your notice may state that you would like your shared parental leave to start either on the day on which your child is born, or a specified number of days after the child's birth.

Shared parental leave must be booked in blocks of at least one week. You can book one continuous period of leave; in which case we must accept your request as long as you are entitled to shared parental leave and

meet the notice requirements. Alternatively, you can book discontinuous periods of leave, separated by periods of work, in which case we will consider your request but reserve the right to refuse it.

Varying or cancelling the dates in your period of leave notice

You can vary or cancel the shared parental leave dates in your period of leave notice by providing us with notice at least eight weeks before any period of leave varied or cancelled is due to start.

To do this, you will need to complete a relevant form and return it to your line manager, copied to the HR Team.

Limit on number of period of leave notices

You can submit three period of leave notices per pregnancy. However, any notice to vary or cancel the dates in your period of leave notice will count towards this total.

Booking Continuous Leave

If you submit a period of leave notice requesting a continuous period of leave, we must accept your request as long as you are entitled to shared parental leave and meet the notice requirements.

Booking Discontinuous Leave

If you submit a period of leave notice requesting discontinuous periods of leave, separated by periods of work, we will consider your request but reserve the right to refuse it.

In such cases, your line manager will start a two-week discussion period with you.

Your line manager may agree to your request, refuse your request or propose alternative dates.

If agreement cannot be reached within that two-week period, you may take the leave as one continuous period of leave on:

- the start date given in your original period of leave notice or
- a new start date that is at least eight weeks after the start date given in your original period of leave notice (in which case you must notify your line manager of that new start date within five days of the end of the two-week discussion period).

Alternatively, if you withdraw your period of leave notice on or before the 15th day after the notice was submitted, it will not count towards the limit on the number of period of leave notices that you are entitled to submit and you may submit a new period of leave notice.

Request for Further Information

We may, within 14 days of receiving your notice of entitlement and intention, ask you to provide:

- a copy of the child's birth certificate (or a signed declaration stating the date and place of birth if the birth certificate is not available); and
- the name and address of the mother or partner's employer (or a declaration that they have no employer).

You must provide this information within 14 days of our request.

Shared Parental Pay

Statutory shared parental pay is available for an eligible mother and partner to share between them while on shared parental leave.

The number of weeks' statutory shared parental pay available will depend on how much statutory maternity pay or maternity allowance the mother has been paid when their maternity leave or pay period ends.

A total of 39 weeks' statutory maternity pay or maternity allowance is available to the mother. There is a compulsory maternity leave period of two weeks. This means that a mother who ends their maternity leave at the earliest opportunity could share up to 37 weeks' statutory shared parental pay with a partner.

Any statutory shared parental pay due during shared parental leave will be paid at a rate set by the Government for the relevant tax year, or at 90% of your average weekly earnings (whichever is lower).

It is up to the mother and partner as to who is paid the statutory shared parental pay and how it is allocated between them. If you intend to receive statutory shared parental pay, you should give notice at the same time that you submit your notice of entitlement and intention.

Entitlement to Shared Parental Pay if you are the mother

If you are a mother, you are entitled to shared parental pay if:

- you have at least 26 weeks' continuous employment with us at the end of the qualifying week
- you remain in continuous employment with us until the week before any period of shared parental pay begins
- your average weekly earnings for a period of eight weeks ending with the qualifying week are not less than the lower earnings limit for national insurance contributions
- you have main responsibility for the care of the child at the date of the child's birth (apart from the partner)
- you are absent from work and intend to care for the child during each week in which you receive statutory shared parental pay and
- you are entitled to statutory maternity pay in respect of the child, but the maternity pay period has been reduced and
- you have complied with the relevant notice and evidential requirements set out in this policy.

In addition, the partner must:

- have been employed or been a self-employed earner for at least 26 of the 66 weeks immediately preceding the expected week of childbirth
- have average weekly earnings of at least the maternity allowance threshold in any 13 of those 66 weeks and
- have main responsibility for the care of the child at the date of the child's birth (apart from the mother).

Entitlement to Shared Parental Pay if you are the Partner

If you are a partner, you are entitled to Shared Parental Pay if:

- you have at least 26 weeks' continuous employment with us at the end of the qualifying week
- you remain in continuous employment with us until the week before any period of shared parental pay begins
- your average weekly earnings for a period of eight weeks ending with the qualifying week are not less than the lower earnings limit for national insurance contributions
- you have main responsibility for the care of the child at the date of the child's birth (apart from the mother)

- you are absent from work and intend to care for the child during each week in which you receive statutory shared parental pay and
- you have complied with the relevant notice and evidential requirements set out in this policy.

In addition, the mother must:

- have been employed or been a self-employed earner for at least 26 of the 66 weeks immediately preceding the expected week of childbirth
- have average weekly earnings of at least the maternity allowance threshold in any 13 of those 66 weeks
- have main responsibility for the care of the child at the date of the child's birth (apart from the partner)and
- be entitled to statutory maternity pay or maternity allowance in respect of the child, but the maternity pay period or maternity allowance period has been reduced.

Your Rights during Shared Parental Leave

During shared parental leave, all the terms and conditions of your contract except normal pay will continue. Your pay will be replaced with statutory shared parental pay if you are eligible for it. However, other benefits such as holiday entitlement and pension contributions will continue as set out below.

Holiday Entitlement

You will continue to accrue your holiday entitlement during your shared parental leave.

You should make every effort to take any outstanding holiday entitlement before commencing shared parental leave or immediately after your shared parental leave has ended if your leave is likely to extend into the next holiday year. Any holiday entitlement that has not been taken because of shared parental leave may be carried over into the next holiday year with the agreement of your line manager.

Pension Contributions

We will continue to make pension contributions based on your normal pay during any period of paid shared parental leave. The contributions that you make will be based on the actual pay that you receive during your shared parental leave.

Our pension contributions will cease during any period of unpaid shared parental leave.

Contact during Shared Parental Leave

We reserve the right to maintain reasonable contact with you during your shared parental leave. This may be to discuss your plans for returning to work, to discuss any special arrangements to be made or training to be given to ease your return to work, or to update you on developments at work during your absence.

Shared Parental Leave Keeping in Touch Days

You can agree to work (or attend training) for up to 20 days during shared parental leave without that work bringing your shared parental leave period or statutory shared parental pay to an end. These are known as "shared-parental-leave-in-touch" (SPLIT) days.

SPLIT days are in addition to the 10 keeping-in-touch days available to a mother during maternity leave. Any work carried out on a SPLIT day will count as a whole working day and you will be paid your normal rate of pay.

We have no right to require you to carry out any work and you have no right to undertake any work during your shared parental leave. Any work undertaken on SPLIT days is entirely a matter for agreement between you and your line manager.

Returning to Work following Shared Parental Leave

You have the right to resume working in the same job and on the same terms and conditions when returning to work from shared parental leave if the period of leave when added to any other period of shared parental leave, statutory maternity or paternity leave taken by you in relation to the child is 26 weeks or less.

You have the right to return to the same job, wherever possible, if you have taken shared parental leave and the period of leave taken is more than 26 weeks when added to any other period of shared parental leave, statutory maternity or paternity leave taken by you in relation to the child. However, if this is not reasonably practicable, we will offer you a suitable alternative job on terms and conditions that are no less favourable.

If you decide that you do not wish to return to work, you must give written notice of resignation as soon as possible in accordance with the terms of your contract of employment.

Version Control:	
Document Name:	Shared Parental Leave (Birth) Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Sickness Absence Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

Having a culture that is diverse, equitable and inclusive is core to everything that we strive to achieve and key to the creation of a positive organisational environment. CDC is also committed to promoting the health and wellbeing of all employees and we wish to offer supportive and effective management of absence due to ill-health and a positive healthy culture that empowers managers to handle sensitive situations in the correct way.

Cotswold District Council aims to encourage all its employees to maximise their attendance at work whilst recognising that there may be occasions when employees may be unable to attend work due to their own ill-health.

CDC will always treat employees fairly and sensitively during times of ill health, but it must also pay due regard to its operational needs. Persistent absence can damage efficiency and productivity and place an additional burden on colleagues.

By implementing this policy, CDC aims to strike a reasonable balance between the pursuit of its operational needs and the genuine need of employees to take time off work because of ill health.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of the management.

Definitions

The following definitions are used in this policy:

"Absence management stages" our step-by-step process for managing frequent Short-term sickness absence.

"Period of sickness absence" or **"instance of sickness absence"** means any continuous period of sickness absence, of whatever length, during which the employee does not work.

"Short-term sickness absence" means any period of sickness lasting one to 27 calendar days.

"Long-term sickness absence" means any period of sickness lasting 28 calendar days or more.

"Formal review period" means a defined period during which an employee is required to show an improvement in their sickness absence levels.

Scope

This policy covers short-term sickness absence. CDC operates a separate policy on long-term sickness absence. Once an employee's sickness has lasted 28 calendar days, CDC's long-term sickness absence policy applies.

Where an employee's absences are being managed under this policy and they then go off on long-term sickness absence, management of their sickness absence will be switched over to CDC's separate policy on long-term sickness absence.

This policy is formulated on the assumption that, if CDC suspects there to be misconduct, its separate disciplinary procedure will apply. For example, CDC may take disciplinary action if there is evidence that:

- absence is not genuine or not for the reason provided
- the employee does not provide satisfactory reason for the absence
- the employee is undertaking inappropriate activities while off sick, such as carrying out work for another organisation or
- the correct sickness absence notification and evidence procedure has not been followed.

Under our absence policy in cases of capability where an individual may be unable to fulfil their substantive role because of sickness or a disability, it may be appropriate to consider alternative action under the performance improvement and capability policy. Alternatively, there may be cases under our Absence Management stages where the disciplinary procedure applies.

This policy recognises CDC is under a legal duty to consider making reasonable adjustments and will do this in collaboration with the employee who becomes disabled or their disability worsens. This is to enable the employee to continue to carry out their role and to support any identified disadvantage being removed.

This policy applies to employees only and does not apply to contractors, consultants, agency workers or any self-employed individuals working for CDC.

Responsibilities:

Guidelines for line managers

When an individual is off sick, a line manager should:

- take responsibility for managing and reviewing their staff's attendance and absence; the manager should ensure that the sickness record is up to date and reflective of an individual's absence.
- maintain a record of each employee's sickness absences ensuring the records clearly identify the reasons for the employee's various absences.
- take responsibility for applying the Attendance management stages under this policy when the relevant absence triggers are met.
- after speaking to them on the first day of absence, maintain contact on at least the fourth day of absence and at regular intervals thereafter. You should agree the frequency with that individual with consideration to the nature of the absence and the duration of any fit notes should the absence extend beyond seven calendar days.
- ensure all records of absences, including discussions and medical certificates remain confidential.

When an individual returns to work the line manager should:

- ensure the employee completes a self-certification form for sickness of seven calendar days or less and provides medical evidence for sickness of more than seven calendar days
- conduct a return-to-work meeting on the first day back
- speak to the employee about the absence and the reason for it in a fair and factual way, understanding that the absence could be sensitive

- be alert to patterns of absence, for example frequent absences on Fridays or Mondays, or immediately before or after bank or public holidays
- be particularly sensitive when absences are caused by personal or family problems
- be mindful of any reference to anything work related, for example, workplace stress.

Concerns around high levels of absence or patterns:

- speak with the individual and highlight any concerns around high levels of absence and be ready to apply the attendance management stages where the absence requires
- try to establish any underlying reasons for frequent absences and, where the underlying cause is identified, take steps to help the employee to manage the cause
- be aware of the potential for discrimination when managing absence, particularly where the employee's ill health is related to pregnancy or disability
- keep in mind CDC's legal obligation to make reasonable adjustments for disabled people when managing absence
- consult with your HR Business Partner if unsure about anything or special circumstances arise, for example if it appears that the employee may have a disability
- bear in mind that CDC may seek a medical report on an employee, for example from the employee's doctor or CDC's occupational health advisers the individuals consent is required to obtain this information;

Guidelines for employees

If they are unable to attend work because of ill health, all employees should:

- notify their manager by telephone as soon as reasonably practicable, preferably before they are due to start work on the first day of absence. If the manager is unavailable, the employee should contact the next most appropriate manager - it is important that the reporting procedures are followed at all times.
- continue to notify on the fourth day and keep in touch with their manager at regular intervals after this while unable to attend work. The frequency of such contact should be agreed between the manager and the employee with consideration to the nature of the absence and the duration of any fit notes should the absence extend beyond seven calendar days.
- be prepared to give their manager a clear reason (i.e., the nature of the illness or injury) why they cannot attend work and estimate as to how long they think the absence will last.

Upon a return to work an employee should:

- complete a self-certification form for sickness of seven calendar days or less and provide medical evidence for sickness of more than seven calendar days
- attend a return-to-work meeting with their manager each time the employee returns from a period of sickness absence
- be open with their line manager about the reasons for their absence, to give the manager the opportunity to provide support where possible
- tell their manager of any extenuating circumstances, for example personal or family problems or an unmanageable workload

Concerns around high levels of absence or patterns:

- bear in mind that CDC has attendance management stages to help support and manage high levels of absence or patterns
- bear in mind that CDC may seek a medical report, for example from the employee's doctor, and

- co-operate with CDC regarding the possible implementation of any adjustments to job duties, hours or working conditions, particularly those suggested by a healthcare professional.

Attendance review management stages

The following procedure aims to provide a consistent approach to managing short term absence initially through informal interventions, and where attendance does not improve/attendance targets are not met and concerns continue, through a formal process.

Consideration will be given to an employee who needs time off for reasons related to their disability such as:

- too ill to work
- attending medical and hospital appointments
- having treatment or therapy
- recovering from treatment

Some adjustment to the trigger points for absence due to disability will made by either

- not counting some or all the sickness absence related to a disability towards any trigger point
- increasing the number of absences that trigger a review

Informal Stage (1): Initial attendance review meeting

You will be required to attend an initial attendance review meeting with your manager if you have:

- Three separate occurrences of sickness absence in a 12-month rolling period; or
- More than 20 working days of sickness absence in a 12-month rolling period; or
- A pattern of absence that is of concern (e.g., Mondays/Fridays or absence following holidays or bank holidays)

The initial attendance review meeting should aim to:

- Check on your wellbeing
- Discuss the reasons for the absence
- Identify any contributing issues and how these may be resolved
- Establish whether there is an underlying medical condition or disability (this may involve seeking further medical advice)
- Consider what other support may be needed
- Advise you of what improvement is expected in your attendance
    - Show immediate and sustained improvement
    - Meet an attendance target
    - Follow reporting procedures at all times during the attendance review period
- Or inform you that there will be no further action

You may be advised that if attendance does not improve you may be subject to disciplinary action

Formal Stage (2): Formal attendance review meeting

You will be required to attend a formal review meeting which will be held with you if your attendance remains of concern and/or there is no underlying medical condition. Reasons for a formal meeting include

- A fourth absence occurs in a 12-month rolling period; or
- Sickness absence has reached 30 working days; or
- The pattern of absence remains a concern

At this meeting your manager will:

- Check on your wellbeing

- Discuss the reasons for the continued absence
- Review your attendance and set a clear timeframe for improvement
    - Show immediate and sustained improvement
    - meet an attendance target
- Discuss how this may be improved
- Consider a referral to occupational health
- Discuss any management support or other needs
- Or inform you that there will be no further action

You may be advised that your absence will be considered a disciplinary issue and managed under the disciplinary or performance improvement or capability procedure and a letter will be sent to you to inform you of the outcome. Any further absences at this stage could then result in a formal procedure being further invoked which may ultimately lead to dismissal.

Right to Representation

At any formal meeting you have the right to be represented by a work colleague or a Trade Union representative. However, consideration will be given to another person in exceptional circumstances.

Notification and Evidence of Sickness Absence

Reporting absence

On the first day of sickness absence, the employee must inform their manager as soon as reasonably practicable that they will not be working because of illness or injury. Preferably, the employee should notify their manager of non-attendance by telephone before they are due to start work and, in any event, as soon as reasonably practicable. If the employee's manager is unavailable, the employee should contact the next most appropriate manager.

The employee should provide a clear reason (i.e. the nature of the illness or injury) why they cannot attend work and estimate how long they think the absence will last. The employee should also be prepared to briefly discuss any consequences of their absence, for example if customer appointments need to be cancelled or any essential work needs to be covered.

Notification of sickness absence must be via telephone, not by text message, email or social media. In exceptional circumstances where the employee is unable to telephone (for example, because of hospitalisation), another person such as a friend or relative can contact CDC on their behalf.

If an employee comes to work but needs to leave during the day because of ill health, they should inform their manager before leaving work. If the manager is unavailable, the employee should inform the next most appropriate person within the department.

Sickness absence that begins part way through the day will count as half a day's sickness absence if the employee leaves before completing 50% of their working day. Where sickness absence begins after the employee has completed 50% of their working day, no absence will be recorded for that day.

After the first day of absence, the employee should generally telephone their manager on the fourth day and at regular intervals thereafter. This should be as agreed with your manager and in line with fit note.

Self-certification of sickness absence

If sickness is for seven calendar days or less, on the first day of the employee's return to work/at a return-to-work meeting, they must obtain, complete and sign a self-certification form, setting out the dates of absence and the nature of the illness or injury.

The line manager should countersign the form and pass it on to Human Resources.

Statement of fitness for work (fit note)

While the first seven calendar days of sickness can be self-certified, all sickness that lasts longer than seven calendar days requires medical evidence. This medical evidence will normally be in the form of a fit note, also known as a "statement of fitness for work".

As well as being issued by doctors, fit notes can be issued by nurses, occupational therapists, pharmacists and physiotherapists who have assessed their fitness for work. Fit notes cannot be issued on request or via over-the-counter services without an assessment.

If the employee's sickness lasts for eight calendar days or more, the employee's line manager must ensure that the employee provides a fit note as soon as possible. A fit note may state that the employee:

- is "not fit for work", in which case the employee should remain off work or
- "may be fit for work", if the healthcare professional's recommendations are followed (for example, a phased return, amended job duties, altered hours of work, or workplace adaptations).
- where a phased return is recommended this will typically be for a period up to 6 weeks.
- in exceptional circumstances a longer period of reduced hours (recommended by Occupational Health) may be agreed. However, a feasibility review will take place at 3 and 6 months to explore whether any adjustments need to take place i.e. with regards temporarily redeploying into a suitable role or a temporary decrease to working hours.

While there is no legal obligation on CDC to follow the recommendations, managers should take the recommendations seriously and give fair consideration - in consultation with the employee and Human Resources - as to whether or not any of the changes recommended can be accommodated.

Sick Pay

CDC operates a contractual sick pay scheme that supplements Statutory Sick Pay and Employment and Support Allowance to maintain normal pay during defined periods of absence on account of sickness, disease, accident or assault.

Providing you follow the correct procedure as detailed in this document, you will normally receive:

Year 1 of service	1 months' full pay (after 4 months' service)
Year 2 of service	2 months' full pay and 2 months' half pay
Year 3 of service	4 months' full pay and 4 months' half pay
During Year 4 and Year 5 of service	5 months full pay and 5 months half pay

After 5 years of service	6 months full pay and 6 months half pay

Contractual sick pay is calculated over a 12-month rolling period. Employees are required to co-operate fully when a medical referral to the Occupational Health Advisor is required. Decisions around capability / reasonable adjustment will be made based only on the medical information available .

Sick pay under CDC's scheme is subject to the usual deductions for PAYE, national insurance, pension contributions, etc.

Payments under the CDC's scheme will be calculated by reference to the employee's salary only and any payments made under CDC's scheme are inclusive of any entitlement to SSP for the same period of absence.

Medical Appointments

CDC recognises that employees will, from time to time, need to attend medical appointments.

Employees should endeavour to arrange medical appointments in their own time or, if this is not possible, at times that will cause the minimum amount of absence from work or inconvenience to CDC, such as first thing in the morning or at the end of the working day.

However, because CDC accepts that it is not always possible to arrange medical appointments outside working hours, it is CDC's policy to permit reasonable time off work for such appointments.

Provided that the employee gives their line manager reasonable notice of the date and time of an appointment, time off with pay will normally be granted, although this is subject to the discretion of the employee's line manager and you may be asked to make the time up.

Where time off for medical appointments becomes frequent or regular, or starts to cause difficulties for the employee's department, the line manager has the discretion either to require the employee to make up for the time off by working extra time on another occasion, or to grant any further time off without pay.

Employees must obtain approval from their line manager in advance of any appointment. The line manager reserves the right to ask the employee to reschedule an appointment if its timing would cause disruption to CDC business. The line manager may also, at their discretion, ask the employee to produce confirmation of the appointment.

Employees who are pregnant have the statutory right not to be unreasonably refused paid time off work for antenatal appointments where the employee's attendance has been recommended by a registered medical practitioner, midwife or nurse. Paid time off in such circumstances will automatically be granted, although employees should endeavour to arrange appointments outside working hours. Nevertheless, the employee should give reasonable notice of the date and time of the appointment to their line manager where possible and the line manager will still have the right to request to see the confirmation of the employee's second appointment and any subsequent appointments.

A prospective partner of a pregnant woman, has the statutory right to take unpaid time off to attend up to two antenatal appointments up to a maximum of 6.5 hours

Special Cases

Pregnancy-related absences

Pregnant employees who are off work because of pregnancy-related ill health must abide by CDC's absence reporting procedure. For example, a pregnant employee is subject to the usual notification and evidence requirements and will be asked to attend a return-to-work meeting when returning to work.

Disability-related absences

Where an employee gives as the reason for absence an underlying health issue that could amount to a disability under the Equality Act 2010, the manager should seek advice from their HR Business Partner to determine how best to support the employee to improve their attendance. This includes where the employee states that they are suffering from any ill-health related to anxiety or stress.

Holiday during sick leave

An employee who is absent on sick leave will continue to accrue their holiday entitlement and will be given the opportunity to take this at a later date, including in the subsequent leave year, if they do not take their holiday entitlement due to being on sick leave.

An employee on sick leave may apply to take their holiday entitlement while on sick leave. The holiday dates must be approved in accordance with CDC's holiday procedure.

Medical Advice

At various stages of managing the employee's sickness absence, a manager may want to obtain advice on the employee's fitness for work from occupational health advisers.

Examples of when a line manager might refer to occupational health include to:

- seek a medical report on the employee
- establish when the employee might be able to return to work
- ask for guidance on the employee's condition, for example if there is a possibility that the employee is disabled or simply where more information is required as to the exact nature of the condition and
- if the employee is disabled, discuss any adjustments that could be made to accommodate the employee's disability.

CDC will treat personal data about you collected during the absence management process in accordance with its data protection policy / policy on processing special categories of personal data (this may include medical certificates or information given by you about your sickness). Information about how an employee's data is used and the basis for processing their data will be provided in the privacy notice which contains the data protection information. Where CDC is relying on its legitimate interests as the legal ground for processing an employee's data, you can object to the processing.

Report from a Medical Practitioner who has been Responsible for the Employee's Clinical Care

Where a report from the employee's medical practitioner is necessary, the employee will be fully informed of their rights under the Access to Medical Reports Act 1988 and their permission will be sought for the report to be obtained.

The employee's permission will be sought to contact the medical practitioner on the relevant consent form, available from Human Resources.

The employee has the right to access the report before CDC sees it. If the employee wishes to see the report, they should inform CDC of this, so that it can inform the medical practitioner. The employee will

then have 21 days to contact the medical practitioner to see the report. If the employee does not contact the medical practitioner within this period, the medical practitioner can pass the report on to CDC.

When requesting a report, CDC will provide the medical practitioner with as much information as possible on the role of the employee and explain why the report is being sought. CDC will provide the medical practitioner with:

- a copy of the employee's signed form consenting to the request to seek a medical report
- confirmation that the employee is aware of their rights under the Access to Medical Reports Act 1988 and
- details of the major features of the employee's job.

CDC will ask the medical practitioner to identify:

- the nature of the employee's illness or injury
- whether or not there are any underlying medical conditions that explain the employee's pattern of absences and
- what reasonable adjustments could be made to working conditions or work premises to facilitate a return to work.

Where the employee refuses permission for CDC to contact their medical practitioner, CDC will explain to the employee the reasons behind the request and inform the employee that a decision relating to their employment may be made without the benefit of access to medical reports. The same procedure will be followed where the employee delays in giving their consent.

Where the employee feels that the report is misleading or incorrect, they may ask the medical practitioner to amend it. If the medical practitioner does not agree with the employee and does not alter the report, the employee may attach a statement to the report to reflect their views.

Alternatively, having seen the report, the employee may request that access to the report be withheld from CDC. The employee will be informed that a decision relating to employment may be made without the benefit of access to medical reports.

Report from a medical practitioner who has not been responsible for the employee's clinical care

The Access to Medical Reports Act 1988 does not apply where CDC is seeking a medical report from a medical practitioner who has not been responsible for the employee's clinical care, typically its own chosen specialist or occupational health adviser.

In these circumstances, CDC will explain to the employee in writing what information it is seeking on the employee's health and how the information will be used. The letter should explain to the employee:

- that CDC intends to obtain a medical report and why it wishes to do so
- from whom the report will be obtained
- what CDC will do with the report
- how CDC will treat personal data collected when obtaining the medical report and
- their right to object to the processing of their personal data.

CDC will write to the medical practitioner to request the report. The letter should explain to the medical practitioner why CDC is requesting the report and ask any specific questions that it wishes the practitioner to answer.

Where the employee objects to the processing of their personal data when CDC is seeking to obtain a medical report to which the Access to Medical Reports Act 1988 does not apply, CDC will explain to the

employee the reasons behind the request and inform the employee that a decision relating to their employment may be made without the benefit of access to medical reports.

Version Control:	
Document Name:	Sickness Absence Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Supporting Bereaved Employees Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

We recognise that dealing with a bereavement can be among the biggest challenges of an employee's life. This policy sets out our commitment to supporting staff through their grief by providing bereavement leave, keeping in touch with staff while they are off work, and supporting staff on their return to work.

We acknowledge that every bereavement is different, and grief impacts everyone in different ways. This policy is intended to cater for a wide range of circumstances and the differing impacts that a bereavement can have, while also recognising the needs of the business.

Bereavement Leave

In the event of the death of an immediate family member (other than a child where the employee is eligible for parental bereavement leave), you will be granted up to 5 days' paid bereavement leave. Additional bereavement leave may be granted by the manager based on individual circumstances. This may be classed as unpaid leave.

For the purposes of this policy, an "immediate family member" is defined as a:

- spouse or civil partner
- partner (including same-sex partner)
- parent (including step-parent)
- adult child (i.e., who is aged 18 or over, meaning that the employee is not eligible for parental bereavement leave)
- sibling (including step-sibling)
- grandparent; or
- grandchild.

Where there is a loss of a child, and that child is under 18. This is a legal entitlement for bereaved parents to be absent from work for up to two weeks where their child passes away. We are fully committed to supporting staff coping with the loss of a child by ensuring that bereaved parents can take parental bereavement leave.

Whatever your length of service, you can take parental bereavement leave if you have lost a child (i.e. under the age of 18) and are the:

- parent of a child who has passed away or
- partner of the child's parent, where you live in an enduring family relationship with the child and their parent or

- "parent in fact" of a child who has passed away, which means that, for a continuous period of at least four weeks before the child passed away, they have been living with the child and had "day-to-day responsibility" for the child (but who is not being paid to look after the child).

Individual who is not an Immediate Family Member

We recognise that you may be grieving following the death of an individual who is not an immediate family member, but with whom you nevertheless have a close relationship, for example an aunt, an uncle, a cousin or a close friend.

If this is the case, you can request bereavement leave and it will be up to your line manager, to decide whether to grant bereavement leave and, if so, how much bereavement leave to grant. The decision will depend on the circumstances, taking into account issues such as:

- the closeness of your relationship with the deceased
- your obligations towards the deceased (for example if you are responsible for arranging the deceased's funeral)
- travel required (for example if you need to travel a significant distance to be with relatives) and
- any bereavement requirements in relation to religion, such as an extended period of mourning (with the onus on you to tell your line manager about these requirements).

The employee can be granted up to 3 days' paid bereavement leave.

Support during Bereavement

If you have suffered a bereavement and cannot attend work, you should inform your line manager of what has happened by telephone as soon as reasonably practicable. This will allow us to support you.

You should inform your line manager of what you would like colleagues to know about the situation and of any urgent tasks that other staff can pick up or meetings that need to be cancelled or rearranged.

Following the initial contact, you and your line manager should keep in touch. The level of contact is a matter for agreement between the two of you.

External Support

External sources of help and support for bereaved employees include:

- Cruse Bereavement Care / Cruse Bereavement Care Scotland, which offers support to bereaved people, for example via a telephone helpline;
- Child Bereavement UK, which offers support to families when a child passes away, for example via a telephone helpline;
- Age UK, which has a website that includes guidance and support on coping with bereavement;
- WAY Widowed and Young, which specialises in supporting people aged 50 or under whose partner has passed away; and
- Marie Curie, which supports families living with a terminal illness.

Other Types of Leave

Where you have exhausted bereavement leave, or you are not entitled to bereavement leave under this policy you can still apply for annual leave under our holiday policy in the usual way.

Employees who are not entitled to bereavement leave under this policy may be able to take unpaid time off under our separate time off for dependant's policy. Employees can take unpaid time off work to take action necessary "in consequence of" the death of a dependant. However, the right is limited to the death of an employee's spouse, civil partner, child or parent, or someone who lives in the employee's household (not as a lodger, tenant or employee).

If you are taking sickness absence as a result of ill health brought on by a bereavement, our usual sickness absence policy applies. Under the sickness absence policy, you must:

- complete a self-certification form for sickness of seven calendar days or less; and
- provide medical evidence for sickness of more than seven calendar days.

Return to Work

Once you are back at work, you can discuss with your line manager what further support we can provide.

We recognise that a bereaved employee may not be able to return immediately to their full duties or way of working. It sees the value of temporarily adjusting a bereaved employee's duties or phasing the employee back to work when it is appropriate to do so.

We will consider requests to make temporary changes to working arrangements, such as allowing you to work reduced hours; work from home on certain days; or be reassigned to another role (for example away from a customer-facing role).

Depending on the nature of the temporary changes, your line manager may agree to the temporary adjustments informally with you, or you may need to make a formal request for flexible working.

We recognise that some bereavements will result in an employee being permanently unable to return to their full duties or way of working. For example, an employee with children whose partner passes away may have increased childcare responsibilities. Permanent changes that could be requested include moving to part-time working; working from home on certain days; or being reassigned to another role, if such a permanent position is available.

Should we agree to permanent changes that impact on your terms and conditions of employment, you will be asked to agree to a variation of contract.

Health and Safety

A bereavement can result in an employee experiencing lapses in concentration, impaired decision-making, fatigue, and depression or anxiety. If you are concerned about your fitness for work, you should discuss this with your line manager.

We reserve the right to require an employee who is unfit for work to go home on sick leave or to adjust their duties temporarily. It may be appropriate to seek a medical report on the employee or carry out a risk assessment.

Version Control:	
Document Name:	Supporting Bereaved Employees Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Supporting Employees through Pregnancy Loss Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

This policy sets out the rights of employees affected by a miscarriage, stillbirth or termination for medical reasons (TFMR) and explains the emotional and practical support that we can provide.

We empathise when an employee experiences pregnancy loss as we know it is extremely distressing, regardless of how early in pregnancy the loss occurs. Pregnancy loss can have significant physical and emotional consequences, which may affect an employee's attendance or performance at work.

We are committed to supporting employees who are affected and encourage you to discuss your situation with us if you are comfortable doing so.

Definitions

The following definitions are used in this policy:

"**Miscarriage**" means the loss of a baby before the end of the 24th week of pregnancy.

"**Stillbirth**" means the loss of a baby after 24 complete weeks of pregnancy.

"**Termination for medical reasons**" (TFMR) describes the ending of a wanted pregnancy after a prenatal diagnosis of a condition with the baby or because of a risk to the mother's health. In this context, the word "termination" is preferred to abortion to make clear that the pregnancy was wanted. A TFMR can occur at any stage of pregnancy, following findings from ultrasound scans or other investigations.

"**Ectopic pregnancy**" means a pregnancy that develops outside the uterus, most often in the fallopian tubes.

"**Molar pregnancy**" is where a fertilised egg implants in the uterus but cannot develop because it does not contain the correct genetic material.

References to a miscarriage in this policy include an ectopic pregnancy and a molar pregnancy.

How a Miscarriage or Stillbirth may affect an Employee at Work

Having a miscarriage, stillbirth or TFMR can affect an employee in a number of different ways, which can in turn affect their work or performance. These include:

- physical symptoms, such as pain, bleeding, lactation, tiredness or a loss of appetite;

- difficulty sleeping or concentrating
- loss of confidence and motivation
- finding social interaction more difficult
- mood swings, irritability or tearfulness
- feelings of guilt and fear of judgement from others and
- mental health problems, such as depression and anxiety and post-traumatic stress disorder.

Telling us about your Miscarriage

You do not have to tell us that you have had a miscarriage.

However, if you would like to do so, we encourage you to tell your line manager, the HR Team or any member of management at an early stage, so that we can provide any necessary support.

Any information given to line managers and any other management is confidential. Colleagues will only be told about the miscarriage if this is what you want. Your line manager will discuss your wishes with you.

If you do not want to tell your line manager about your miscarriage, you can access support by approaching another manager or director for support.

Telling us about your Stillbirth

We encourage you to tell your line manager about your stillbirth at an early stage, so that we can provide any necessary support.

Telling us about your TFMR

You do not have to tell us that you have had a TFMR.

However, if you would like to do so, we encourage you to tell your line manager at an early stage, so that we can provide any necessary support.

You should bear in mind that a TFMR after 24 weeks must be registered as a stillbirth and statutory maternity rights apply in these circumstances. In this situation, we strongly urge you to inform us so that we can advise you of your right to take maternity leave.

Any information given to managers is confidential. Colleagues will only be told about your TFMR if this is what you want. Your line manager will discuss your wishes with you.

If you do not want to tell your line manager about your TFMR, you can access support by approaching another member of management or a director for support.

Time Off

Employees who have experienced a pregnancy loss may need time off work to recover from the physical and emotional consequences.

The amount of time off that is needed will vary from individual to individual. Your right to time off and the type of leave that you can take depends on whether you have had a miscarriage, stillbirth or TFMR.

Miscarriage

If you are unwell and unable to attend work following a miscarriage, we will handle this under our sickness absence policy. You will need to self-certify absences of up to seven days or provide a GP's fit note for longer periods of absence in accordance with the policy.

Your certificate or fit note should confirm that the absence is pregnancy related. Your right to sick pay is also covered by the sickness absence policy.

You may want to consider taking a period of annual leave if you do not qualify for paid sick leave. You should request this in the usual way. We will consider any request sympathetically. We are also willing to consider requests for periods of unpaid leave. You should discuss this with your line manager.

Under our compassionate leave policy, employees are also entitled to 5 days' paid leave. Further information about how to request compassionate leave is contained in the policy.

Stillbirth

Employees who have had a stillbirth can take statutory maternity leave and (if eligible) receive statutory maternity pay. Maternity leave starts on the day after a stillbirth.

If you would like to take maternity leave, you should tell us about the stillbirth as soon as possible and provide a copy of your MAT B1 certificate if you have not already done so. Further information can be found in our maternity policy.

Employees can also take up to two weeks' statutory parental bereavement leave after their statutory maternity leave, and (if eligible) receive statutory parental bereavement pay. Further information can be found in our parental bereavement leave policy.

TFMR

If you are unwell and unable to attend work following a TFMR, we will handle this under our sickness absence policy. You will need to self-certify absences of up to seven days or provide a GP's fit note for longer periods of absence in accordance with the policy.

Your certificate or fit note should confirm that the absence is pregnancy related. Your right to sick pay is also covered by the sickness absence policy.

A TFMR after 24 weeks must be registered as a stillbirth and the right to take maternity leave applies in these circumstances.

You may want to consider taking a period of annual leave if you do not qualify for paid sick leave or maternity leave. You should request this in the usual way. We will consider any request sympathetically. We are also willing to consider requests for periods of unpaid leave. You should discuss this with your line manager.

Practical and Emotional Support

Our intranet signposts employees and line managers to external sources of help and support, including:

- The Miscarriage Association, which provides support and information to those affected by miscarriage, ectopic pregnancy or molar pregnancy and offers a pregnancy loss helpline
- Sands, which provides support to anyone who has been affected by stillbirth or neonatal death

- Tommy's, a charity that carries out research and supports those who have lost babies
- the Mariposa Trust, a charity that provides support to those affected by baby loss and bereavement
- Petals, a charity providing counselling to parents bereaved after pregnancy loss, including TFMR
- Antenatal Results and Choices (ARC), a charity providing support to those who decide to terminate a pregnancy for medical reasons
- the Dad Still Standing podcast, in which two fathers share their experiences of baby loss and provide advice and guidance to those who reach out to them
- the Time to Talk TFMR podcast, which deals sensitively with all aspects of TFMR and
- Mind, which provides support and information to those experiencing mental health issues for any reason.

Returning to Work

Your line manager will keep in touch with you during any period of leave after pregnancy loss to discuss:

- what information, if any, you want to share with colleagues before you return to work and how that information should be provided
- any additional support you need to return to work, such as a phased return/temporary changes to your duties, hours or location of work/a period of homeworking/additional breaks and
- any adjustments recommended by a health and safety risk assessment.

Your line manager will arrange a meeting with you to discuss these issues before your return to work if you would find that useful.

Your line manager will also have regular meetings with you after your return to work so that we can continue to provide adequate support.

Rights of Partners and Fathers/Parents

We recognise that the loss of a baby is a distressing experience for both parents. Therefore, an employee whose partner has a miscarriage, stillbirth or TFMR, or the father or parent of the baby who has passed away, may also need support or be eligible for time off.

The sources of practical and emotional support listed above are also open to fathers and partners and we encourage employees to access these. The Miscarriage Association has published guidance Partners Too, which they may find helpful. They should discuss any additional support that they need with their line manager.

The right to time off for partners and fathers/parents depends on how long the pregnancy lasted.

Miscarriage

Employees can take a reasonable amount of unpaid time off, also known as time off for dependents, to provide assistance if their spouse or civil partner falls ill. Employees should tell us the reason for their absence as soon as possible and say how long they expect to be off work.

Stillbirth

Employees can take a reasonable amount of unpaid time off, also known as time off for dependents, to provide assistance if their spouse or civil partner falls ill. Employees should tell us the reason for their absence as soon as possible and say how long they expect to be off work. Further details are set out in our time off for dependant's policy.

In addition to unpaid time off, the partner of the individual who has a stillbirth, or the father/parent of the baby who has passed away, may be eligible for:

- either one- or two-weeks' statutory paternity leave and pay further information is set out in our paternity leave policy
- up to two weeks' statutory parental bereavement leave and pay, which can be taken as two separate weeks or a single period of leave further information is set out in our parental bereavement leave policy and
- 5 days paid leave under our compassionate leave policy.

TFMR

Employees can take a reasonable amount of unpaid time off, also known as time off for dependents, to provide assistance if their spouse or civil partner falls ill. Employees should tell us the reason for their absence as soon as possible and say how long they expect to be off work. Further details are set out in our time off for dependant's policy.

Under our compassionate leave policy, employees are also entitled to 5 days paid leave. Further information about how to request compassionate leave is contained in the compassionate leave policy.

A TFMR after 24 weeks must be registered as a stillbirth and the right to take paternity leave applies in these circumstances.

The role of other Employees

If a colleague is experiencing a miscarriage while they are at work, employees should respond sympathetically and supportively.

Practical steps that you can take include:

- ensuring that they have privacy and access to a toilet
- providing a wrap or covering if they are bleeding heavily
- arranging transport home or to a hospital as appropriate (including calling an ambulance if this is necessary and arranging for someone to accompany them)
- calling their partner or a friend to notify them of the situation, if this is what they want and
- reassuring them not to worry about work and that arrangements to cover their work will be made.

We recognise that an employee whose partner is having a miscarriage or stillbirth may need to leave work at short notice and arrangements will be made to accommodate this.

If a colleague has chosen to share information about a miscarriage or stillbirth, when they return to work employees should offer them sympathy and support and acknowledge their loss. The Miscarriage Association has published Supporting someone you know, which contains guidance on how to talk sensitively about miscarriage in the workplace.

Version Control:	
Document Name:	Supporting Employees through Pregnancy Loss
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Time off for Dependants Policy & Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

This policy takes the following approach to emergency situations involving employees' dependants. The policy explains the right to take time off to manage unexpected or sudden problems relating to a dependant and make any necessary longer-term arrangements.

Circumstances in which Right to Time off for Dependants Applies

Irrespective of your length of service, and whether you are part time or full time, you can take a reasonable amount of time off during working hours to take necessary action:

- to provide assistance when a dependant falls ill, gives birth or is injured or assaulted
- to make arrangements for the provision of care for an ill or injured dependant
- in consequence of the death of a dependant
- because of the unexpected disruption or termination of arrangements for the care of a dependant; and
- to deal with an incident that involves their child and occurs unexpectedly while the child is at school/school/another educational establishment.

A dependant is:

- a spouse
- a civil partner
- a child
- a parent
- a person who lives with you other than as your employee, tenant, lodger or boarder
- any other person who would reasonably rely on you for assistance if they fell ill or was injured or assaulted, or who would rely on you to make arrangements for the provision of care in the event of illness or injury or
- in relation to the disruption or termination of care for a dependant, any other person who reasonably relies on you to make arrangements for the provision of care.

What you should do if you need Time off for Dependants

If you need to take time off for dependants, you should contact your line manager at the earliest opportunity. If you become aware of an emergency situation while at work, you should immediately speak to your line manager about leaving work early. You should explain:

- the reason for the absence and
- how long you expect to be absent from work.

If your line manager is unavailable, you must speak to an equivalent or more senior manager.

If you are unable to contact with a line manager or suitable alternative person before taking time off for dependants, you should contact your line manager as soon as possible.

You must inform your line manager as soon as possible of any change in the anticipated date of your return to work.

Pay

There is no statutory entitlement to receive pay while taking time off for dependants. Therefore, we do not pay you for any time off for dependants.

How much Time off can be Taken?

The right to time off for dependants will, in most cases, be one or two days. You must actively seek alternative longer-term arrangements for the care of a dependant as soon as possible after the emergency occurs. If you are unable to make alternative arrangements, you must contact your line manager and explain why further absence is required.

Other Types of Leave

Time off under this policy is intended to be for you to deal with emergency situations involving dependants. Once the immediate emergency has been taken care of, you are expected to return to work or, if further time off is necessary, request to take it as annual leave under our holiday policy.

We have a separate policy on compassionate leave, which is to help you to come to terms with the death of a loved one, a serious illness or injury involving a loved one, or serious personal relationship problems.

Should you find yourself dealing with the loss of a child, you should refer to the Parental Bereavement Leave Policy.

Version Control:	
Document Name:	Time off for Dependants Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

COTSWOLD DISTRICT COUNCIL

www.cotswold.gov.uk

Unauthorised Absence Policy and Procedure

Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees to give their best.

Having a culture that is diverse, equitable and inclusive is core to everything that we strive to achieve and key to the creation of a positive organisational environment. CDC is committed to promoting the health and wellbeing of all employees, we wish to offer supportive and effective management of unexpected absence and would emphasise the importance of always contacting your employer.

Cotswold District Council aims to encourage all its employees to maximise their attendance at work while recognising that employees will, from time to time, be unable to come to work because of ill health or some other reason.

CDC will always treat employees fairly and sensitively during times of sickness and ill health, it must also pay due regard to its operational needs. If an employee is persistently absent from work, this can damage efficiency and productivity, and place an additional burden on the employee's colleagues.

By implementing this policy, CDC aims to strike a reasonable balance between the pursuit of its operational needs and the genuine need of employees to take time off work. However, it should be noted that all absences from work need to be authorised.

This policy on unauthorised absence applies to all employees. It applies if an employee fails to comply with CDC's sickness absence reporting procedure (or provide the necessary evidence within the required time period), fails to attend work or return from holiday, or is absent from work for any other reason without notification and/or agreement.

If an employee is absent from work without good cause and/or fails properly and effectively to notify CDC of their absence, this may be treated as a serious disciplinary offence, potentially constituting gross misconduct. (add hyperlink to policy to finished document)

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of the management.

Action on First Day of Absence

On the first day of the employee's absence, their line manager will attempt to contact them, making a note of the means used and keeping a record of the time. If the employee does not answer the telephone, the manager will attempt to leave a voicemail asking them to return the call. The manager can also try any other methods to contact the employee, including text message to a private mobile phone, if available.

If the manager is unable to contact the employee, they may attempt to contact the employee's next of kin or listed emergency contact.

Action on Second Day of Absence

On the second day of absence, if nothing has been heard from the employee and the manager has again been unable to contact them and has not received a satisfactory explanation from the employee's next of kin or emergency contact, the manager will write to or email the employee detailing their absence and the attempts to make contact them.

The letter will say that no satisfactory explanation for the absence has been received and will require that the employee make contact with the manager as soon as possible, but no later than three days after the date of the letter (or email). The letter (or email, with the relevant read receipt notification) will warn the employee that, if they fail to make contact by the deadline, the organisation may take serious disciplinary action.

Further Action after Second Day of Absence

If, following the deadline, the employee has still not contacted their manager, the manager will send the employee a letter inviting them to attend a disciplinary hearing to explain their absence. The letter should warn the employee that the lack of an adequate explanation could result in summary dismissal for gross misconduct.

Disciplinary Action

If the manager contacts the employee and/or the employee returns to work, a further investigation may be carried out into the reasons for their absence and their lack of contact with CDC.

If the employee can give an adequate explanation for their absence and lack of contact, the manager can conduct a return-to-work interview. If the employee is unable to provide an adequate explanation for their absence and lack of contact, CDC will treat the absence and the failure to follow the reporting procedure as disciplinary matters.

If the employee claims to have been sick (to the extent that this also precluded contacting CDC), the manager can ask for reasonable evidence of this, this may be in the form of a fit note for instance. If the employee is unable to provide sufficient evidence, CDC may consider whether the claimed sickness absence was genuine.

If the manager considers the employee's failure to attend work to be potential gross misconduct, CDC will conduct any disciplinary hearing in accordance with its disciplinary procedure- hyperlink?

Unauthorised Annual Leave

If an employee has been refused a request for annual leave but declares that they intend to take the time off anyway, the employee's manager should write to or email the employee instructing them to attend work. The letter should confirm that:

- the leave request (for the specific dates) was legitimately declined, with the reason given
- the employee is expected to attend work as usual and
- failure to do so will be unauthorised absence, be unpaid and may result in disciplinary action, which could result in summary dismissal for gross misconduct.

The letter should invite the employee to reconsider their expressed intention to be absent.

If, having sent this letter (or email), the employee fails to attend work, the manager should treat the absence as unauthorised. If an employee has been refused a request for annual leave and fails to attend

work (either by saying that they are sick or by making no contact), CDC will investigate this as a potential unauthorised absence. Should the employee have been prevented from contacting work due to serious circumstances, this should be made known at the earliest convenience.

Version Control:	
Document Name:	Unauthorised Absence Policy
Version:	1.0
Responsible Officer:	
Approved by:	
Date First Approved:	
Next Review Date	
Retention Period:	

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COTSWOLD DISTRICT COUNCIL

Council name	**COTSWOLD DISTRICT COUNCIL**
Name and date of Committee	**CABINET – 12 SEPTEMBER 2023**
Subject	**COUNCIL PRIORITY AND SERVICE PERFORMANCE REPORT – 2023-24 QUARTER ONE**
Wards affected	All
Accountable member	Councillor Joe Harris, Leader of the Council Email: joe.harris@cotswold.gov.uk
Accountable officer	Robert Weaver, Chief Executive Email: robert.weaver@cotswold.gov.uk
Report author	Gemma Moreing, Business Intelligence & Performance Lead Email: democratic@cotswold.gov.uk
Summary/Purpose	To provide an update on progress on the Council's priorities and service performance
Annexes	Annex A - Corporate Plan Action Tracker Annex B - Council Priorities report Annex C - Performance indicator report
Recommendation(s)	*That Cabinet resolves to:* *1. Note overall progress on the Council priorities and service performance for 2023-24 Q1.*
Corporate priorities	• Deliver the highest standard of service • Respond to the climate crisis • Provide socially rented homes • Make our local plan green to the core • Support health and wellbeing • Enable a vibrant economy
Key Decision	NO
Exempt	NO
Consultees/ Consultation	Publica Directors, Assistant Directors, Business Managers, Service Managers and Service Leads

COTSWOLD DISTRICT COUNCIL

1. BACKGROUND

1.1 A high-level commissioning statement was approved by Cabinet in January 2020 which sets out the relationship between Publica and the Council and their respective responsibilities. Publica must ensure that it provides the necessary information to the Council so it can assess whether the commissioned services are being delivered in accordance with the agreed quality and standard. In essence, Publica as contracting agent for the Council must ensure that the Council has sufficient information to challenge the performance of services provided by Publica and others. A similar approach is taken in relation to financial performance data, which will be presented to the Head of Paid Service and the Chief Finance Officer; and where it will be for the Chief Finance Officer to advise in terms of assurance.

1.2 The Council's Chief Executive is responsible for reviewing and approving the information provided in this report prior to its publication.

2. COUNCIL PRIORITY REPORT

2.1 The Council adopted the Corporate Plan 2020-24 ('the Plan') in September 2020, A spring 2022 'refresh' of the Plan was completed and approved by Council at its meeting in May 2022. The refresh sought to reflect key achievements since the introduction of the Plan and clarify the priorities over the remaining period of the Plan (to April 2024).

2.2 Progress on actions in the Corporate Plan for Q1 include:

- A welcome letter & newsletter has been emailed to new and returning Town & Parish councillors. Virtual social media training is booked for August with the next face to face forums to be held in September.
- The main works are finished on the new footpath cycle link to Neigh Bridge in the Cotswold Water Park and discussions are underway to deliver cycle stands in Fairford, Lechlade and South Cerney. A new section of bridleway has been commissioned under Wildmoor Lane and Gloucestershire County Council (GCC) have requested Community Infrastructure Levy (CIL) funding for the Spine Road crossing.
- Meetings are scheduled with West Oxfordshire Council and Thames Water to discuss flood mitigation strategies. A new Lead Flood Officer has been recruited by Gloucestershire Rural Community Council (GRCC) and they will start in July. GRCC have organised two Countywide Floor Forums to be held in Q2.
- Following budget allocation for engagement support for the public engagement plan surrounding carbon reduction and climate change, the exact nature of the role is being finalised with senior officers and members before going out to recruit.
- A proposal for Solar PV on Trinity Road Council offices went to Cabinet on 17 July and then on to Full Council for approval of funding.
- Works have started on creating the community and wildlife sanctuary at Chesterton Cemetery.

- The Collaboration Agreement entered into by the Council and Bromford Housing to deliver the Down Ampney housing development has been delayed due to drainage concerns, but progress is now underway with a planning application due to be submitted in September.
- Meetings have been arranged with social housing partners Oxplace and Cottsway in July to understand different models for the provision of affordable housing.
- A meeting held in June has resulted in a Sewage Summit Event being arranged in Q2 to discuss minimising the risks associated with flooding.
- Community Building projects including rural crime talks and Community Growing Schemes have taken place across the district along with Group Visits to various societies and clubs.
- The Cotswold Community Network membership has increased, and positive feedback has been received.
- Shortlisting of Safer Streets Cotswolds proposals has been completed. The next stage will be to visit the shortlisted areas. After the visits and more local engagement, the decision will be taken on which areas will receive the improvements to make them safer.
- Further events and classes have been well received as part of the Active Cotswold Action Plan. The partnership agreement with Mr Motivator will start in July.
- The Holiday Activity Food programme continues to be a success and GCC have suggested (not confirmed yet) that the Council has reached the highest percentage of Free School Meals (FSMs) children, then any other district
- Cotswold Chat Mental Health Support Programme will benefit from a £50k investment from the Strengthening Local Communities (SLC) funding secured last quarter following work with the Integrated Locality Partnership (ILP). The remaining funding (£99k) will be used to support families and young people.
- The Dementia Friendly Bourton Group has branched out successfully and is now known as Dementia Friendly North Cotswolds.
- The Changing Places Toilet Facilities are complete at Cotswold Farm Park. Abbey Grounds, Cirencester is almost complete. Birdland and Cotswold Country Park and Beach are in the planning and procurement stages and will be delivered early in 2024.
- Additional promotion for mental health activities and initiatives continued in Q1 through the Cotswold Community Network.
- The Council has taken the lead for the Rural Domestic Abuse Champions Network. The contract has been completed and started in June. Gloucestershire Domestic Abuse Support Service (GDASS) have started recruitment and the advert is now live. It is hoped that the new postholder will start in September 2023.

2.3 Off target actions of the Corporate Plan behind schedule at Q1 include:

- **Develop and implement an Asset Management Strategy.**
  Update: Discussions are underway with the Procurement Team to appoint a consultant to prepare the Asset Management Strategy
- **Develop support to owner-occupiers to invest in energy efficiency, retrofit and decarbonisation works.**
  Update: A report was presented and approved at Cabinet on 17 July for decision to set up district wide owner occupier rooftop PV scheme.
- **Install EV charging points across the District and Provide electric vehicle charging points at all Council premises.**
  Update: There have been significant delays due to the previous supplier and more recently the Distribution Network Operator SSE. Final installations under phase one should be installed in the coming weeks at Rissington Road Bourton on the Water and at Trinity Road Cirencester.
- **Complete an options appraisal of community energy generation, Support community-led and community-owned renewable energy projects, and Support neighbourhood-wide climate action.**
  Update: Options to support this being considered as part of work to refine priorities over the next four-year term
- **Adopt and implement the ecological emergency action plan.**
  Update: There has been some progress with the Habitats Regulations Assessment (HRA) with a mitigation strategy for North Meadow in place so planning applications can be determined. A briefing note for HRA issues is being drafted and should be completed in August. The Biodiversity Net Gain (BNG) project is moving forward but the main issues arise from lack of government guidance and secondary legislation.
- **Deliver a sustainable transport strategy.**
  Update: Recruitment to replace the Sustainable Transport Lead has not been successful. Following feedback from applicants that declined to further their application, options are being considered on how to move forward. These options will be costed and presented to the Chief Executive and Portfolio Holder by the end of August.
- **Develop an updated Playing Pitch Strategy (PPS) to inform planning and investment in pitch-based facilities.**
  Update: The final version of the updated PPS has been received and signed off by Sport England. The intent is to bring this to September Cabinet for approval and adoption.
- **Work with our partners to ensure our young people have the skills they need to secure employment in the district.**

Update: Cirencester College T level building now completed. Discussions being held with Cirencester College about linking with sustainable aviation businesses in the district in terms of skills and training. The UK Shared Prosperity Fund (UKSPF) funding includes provision in Year 3 (2024/25) to support those furthest from the labour market.

- **Develop and implement an action plan to improve digital inclusion.**
  Update: Work is progressing through partnership activity, although there is limited collective capacity to make headway. A headline report outlines eight recommendations to help tackle the digital divide and frames a range of questions revolving around next steps. This is supported by digital exclusion risk mapping, community asset mapping (what's out there already) and a 'what we know about closing the digital divide report. Focus on competing priorities, such as UKSPF and the Rural England Prosperity Fund (REPF) has slowed progress on this.

2.4 An overview of progress against all actions in the Corporate Plan is attached at Annex A and the Council Priority highlight report is attached at Annex B.

3. SERVICE PERFORMANCE

3.1 Service performance above target:

- Percentage of Council Tax Collected (33.93% against a target of 23%)
- Percentage of Non-Domestic Rates collected (29.81% against a target of 25%)
- Processing times for Council Tax Support Change Events (3.85 days against a target of 5 days)
- Percentage of Housing Benefit overpayment due to LA error/admin delay (0.26% against a target of 0.35%)
- Customer Satisfaction (98% against a target of 90%)
- Building Control Satisfaction (100% against a target of 90%)
- Percentage of minor planning applications determined within agreed timescales (90.1% against a target of 65%)
- Percentage of major planning applications determined within agreed timescales (100% against a target of 70%)
- Percentage of other planning applications determined within agreed timescales (84.21% against a target of 80%)
- Number of visits to the three leisure centres & (Snapshot) Number of gym memberships (3090 memberships against a target of 2838 memberships and 128512 visits against a target of 125000)

3.2 Service Performance below target:

Processing times for Council Tax Support New Claims (29.63 days against a target of 20 days) and Housing Benefit Change of Circumstances (12.02 days against a target of 4 days)

Q1 started with a backlog of work for new claims and change of circumstances cases. The team have worked hard to get this backlog more under control. However, a large number of applications from residents as a result of the Cost-of-Living Crisis continues to be received.

(Processing times for Council Tax Support Change Events however remains well within the target of 5 days.)

The Resolution: To improve performance, investigations were made into the automation capability. On speaking with other councils, who were able to achieve 70% of processing automation as opposed to the 40-45% that the service was achieving, it became apparent that the same capability was possible, but processes had to change to maximise on the capabilities of the system. Improved automation means that the team will have more capacity to both clear any backlogs and prevent their recurrence.

This way of working will continue to be tested and monitored but week-by-week, the processing stats are reducing. By being up to date, the service will be able to stay on top of the processing stats and keep reducing them.

July's figures show that Council Tax New Claims are being processed in 19.68 days against the target of 20 days and Housing Benefit Changes of Circumstance are being processed in 7.59 days against a target of 4 days.

At the time of writing, there are 34 outstanding cases for Housing Benefit Changes of Circumstance, the oldest of which is 3 days old. There is one Council Tax New Claim that is one day old (10 August 2023).

Publica remains committed to further improving its performance and service delivery and is actively investing in the development and implementation of automation and self-serve options for customers. By providing accessible and efficient self-help tools, customers can address their queries and concerns independently, leading to a decrease in the need for repeated interactions with services. Publica will continue to monitor, assess, and report on the impact of improvement programs in reducing customer contact and enhancing operational efficiency.

Missed Bins per 100,000 (88 against a target of 80)

The number of missed bins per 100,000 increased from 75 in Q4 to 88 in Q1. This is above target and higher than both last quarter and this time last year. This has been attributed to issues with one of the crews not completing their rounds for garden waste. This has now been rectified.

The Resolution: Additional training with crews and supervisors to bring the misses down. Performance will be continuously under review by the Contract Monitoring Team.

Percentage of official Land Charges searches completed within 10 days (86% against a target of 90%)

The Councils performance has improved since last quarter and dramatically since last year. Although it is still below target.

The Resolution: A monthly performance meeting has now been set up with the Assistant Director responsible for most of the answering teams, where issues will be discussed to ensure the process runs efficiently and teams where delays are occurring can be identified and action taken to ensure targets are met going forward. Tweaks to the current escalation process, has improved responses times so reducing delays and sessions lead by the Land Charges Team Leader has raised the awareness of the importance of responding to requests within the timescales set.

The service would benefit from all searchable records being digitised and standard procedures being in place for system use. This would in turn streamline searches. Further training and discussions with internal consultees are planned to ensure good practice.

Number of Affordable Homes Delivered (11 against a target of 25)

Eleven affordable rent properties have been delivered in Cotswold at Upper Rissington and South Cerney against a forecast of 68. Having contacted one of the Registered Providers (RPs), the service report that 17 of the forecast properties for Q1, should have been forecast for Q1 2024-25.

The Resolution: Following changes within the team, the Project Specialist for Strategic Housing is contacting the Registered Providers (RPs) to develop relationships and to assess why those properties forecast have not been completed. Ultimately the Developers are responsible for delivering completed properties and the Strategic Housing Project Specialist will contact the RPs about the schemes that are currently off track to find out when they will be delivered in addition to the properties forecast for the rest of the year.

The service reports that completions fluctuate over the year. A housing development period is at least 12 months, with some schemes phased over several years.

3.3 A full report is attached at Annex C and should be looked at in conjunction with this report.

3.4 As previously agreed, where possible, broader benchmarking has been included in the full performance report to gain a more robust and insightful evaluation of performance. Where benchmarking data is not currently available or outdated, this is noted, and further investigations will be undertaken to look at options.

4. OVERVIEW AND SCRUTINY COMMITTEE

4.1 This report will be reviewed by the Overview and Scrutiny Committee at its meeting on 26 September 2023; and any comments from the Committee will be recorded and shared with relevant Cabinet Members.

5. FINANCIAL IMPLICATIONS

6.1 There are no direct financial implications from this report.

6. LEGAL IMPLICATIONS

6.1 None specifically because of this report. However, a failure to meet statutory deadlines or standards in some services may expose the Council to legal challenge and/or financial liability.

7. RISK ASSESSMENT

7.1 Contained in this report.

8. EQUALITIES IMPACT

8.1 None.

9. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

9.1 Contained in this report.

10. BACKGROUND PAPERS

10.1 None.

(END)

Cotswold District Council Corporate Plan 2020-2024 Update: Progress by end of Q1 2023-2024

Green	On target
Amber	Off target but action being taken to ensure delivery (where this results in a reviewed target date, this is made clear in the table)
Red	Off target and no action has yet been agreed to resolve the situation
Complete	Action completed
Cancelled	Superseded/cancelled
On Hold	Action on hold

Deliver the highest standard of services

Ref.	Our aims	Our actions	Commencement	Date due, Achieved	Officer	Cabinet Member	RAG Rating	Comment for Q1
SS1	Ensure that road and street cleaning across the district is undertaken proactively and to a high standard, as part of the 'Clean and Green Cotswolds' initiative.	Maintain verges	November 2020	April 2024	Bill Oddy/Scott Williams	Joe Harris	On Target	Linked to Clean & Green
SS2		Improve road sweeping regimes	November 2020	April 2024	Bill Oddy/Scott Williams	Joe Harris	Complete	
SS3		Replace worn and damaged street nameplates	September 2020	167 replaced by April '22 Approx. 120 scheduled for replacement summer/autumn 2022	Claire Locke/Alfred Tolley	Joe Harris	Complete	A new project plan for street signs, setting out number, location, cost and timescales is being prepared for the 2023/24 roll out.
SS4		Keep areas of open space tidy	April 2021	April 2024	Andy Barge/Scott Williams	Joe Harris	On Target	Linked to Clean & Green
SS5	Deliver an excellent Town and Parish Council engagement programme	Maintain contact with all town and parish councils through a regular newsletter	October 2020	Achieved	Angela Claridge	Joe Harris	Complete	
SS6		Deliver programme of engagement for town and parish councils	October 2021	April 2024	Angela Claridge	Joe Harris	On Target	Welcome letter & newsletter emailed to new and returning Town & Parish councillors June 2023. Virtual social media training booked 10.08.2023 with next face to face forums in September.
SS7	Roll out cashless car parking to our car parks across the district, including an exemplar car park at Bourton on the Water	Introduce cashless parking in all car parks	July 2020	March 2023	Frank Wilson/ David Stanley	Tony Dale	Complete	
SS8		Determine the feasibility of 'pay on exit' parking, and implement if appropriate	March 2021	May 2022	Jon Dearing/Maria Wheatley	Tony Dale	Complete	
SS9		Review charging periods at all car parks	March 2021	April 2022	Jon Dearing/Maria Wheatley	Tony Dale	Complete	
SS10		Make the Whiteway car park operational	January 2020	Achieved	Jon Dearing/Maria Wheatley	Tony Dale	Complete	
SS11		Deliver Improvements to Rissington Road Car Park, Bourton on the Water	November 2022	March 2023	Claire Locke/Andrew Dike	Tony Dale	Complete	
SS12	Develop, implement and deliver a	Produce a strategy on a page	November 2021	Achieved	Andy Barge/Philippa Lowe	Juliet Layton	Complete	
SS13		Produce Actions Plans for each of the 4 Strategic Elements, holding stakeholder engagement as appropriate.	November 2021	April 2022	Andy Barge/Philippa Lowe	Juliet Layton	Complete	

	Develop, implement and deliver a strategy for the Cotswold Water Park	Deliver on funded projects	November 2021	March 2023	Andy Barge/Philippa Lowe	Juliet Layton	On Target	The new foot/cycle path Neigh Bridge - whilst works were finished there are issues around detail of the works which are still be pursued with GCC in liaison with the Cotswold Lakes Trust. - Meeting held with contractors to discuss installation works and progress against agreed delivery of 46 new cycle stands in Fairford, Lechlade and South Cerney. Next meeting with contractors in 4 weeks. A new section of bridleway under Wildmoor Lane is commissioned and being delivered by GCC Rights of Way team. Site meeting held, they know what is required and have done specification and land is being dedicated. - Spine Road Crossing: GCC has made a request for CIL funding . Need to establish if it is just a reinvigoration of work already done. Efforts by Officers are being made to maintain the momentum in terms of the desire to deliver
SS14								
SS15	Establish financial resilience to enable investment in our priorities	Adopt and implement a clear financial strategy that reflects the changing economy and our identified needs	September 2020	Refreshed annually	David Stanley	Mike Evemy	On Target	
SS16		Adopt and implement recovery investment strategy	September 2020	Refreshed annually	David Stanley	Mike Evemy/Tony Dale	Cancelled	
SS17		Develop and implement an asset management strategy	March 2021	December 2022	David Stanley/Claire Locke	Mike Evemy	Off Target, but action being taken to ensure delivery	David Stanley liaising with procurement team on appointment of consultant to prepare Asset Mgt Strategy
SS18	Create maximised flood protection measures for residential and commercial properties	Provide advice and guidance Promote and deliver flood mitigation measures, where appropriate	September 2020	April 2024	Phil Martin/Laurence King	Lisa Spivey	On Target	A meeting between the Portfolio holders at CDC and WODC is in the process of being arranged to share knowledge around the workshops that have been held with TW, where their SWT capacity and ability to deal with current and future demands have been discussed and their data analysed. An initial meeting with Thames Water has been set up for the 7th July.
SS19		Roll out the Cotswold Flood Warden Programme	November 2021	November 2022 for the initial pilot year.	Robert Weaver	Lisa Spivey	On Target	Progress has been limited in quarter 1, due to the lead officer leaving GRCC. The post was advertised, and filled in late June, with the new officer due to start on 24 July. GRCC have also organised two Countywide Flood Forums, which take place on 10 July and 2 August.
SS20	Provide a trusted, inclusive and transparent planning service	Restructure our team to ensure resilience	September 2020	Achieved	Frank Wilson	Juliet Layton	Complete	
SS21		Relaunch our pre-application service	September 2020	June 2022	Charlie Jackson/Phil Shaw	Juliet Layton	Complete	
SS22		Improve communication with residents	January 2021	April 2024	Charlie Jackson/Phil Shaw	Juliet Layton	On Target	No Change
SS23		Develop an ICT enabled proactive approach to planning enforcement	April 2021	April 2024	Charlie Jackson/Phil Shaw	Juliet Layton	On Target	No Change
SS24		Maximise external funding opportunities	December 2020	April 2024	Charlie Jackson/Phil Shaw	Juliet Layton	Complete	
SS25	Provide an efficient and competitive building standards service	Compare local markets	March 2021	Monthly, to understand market share	Charlie Jackson/Phil Shaw	Juliet Layton	On Target	No Change
SS26		Maximise opportunities for income generation	April 2021	Ongoing, as an iterative review process.	Charlie Jackson/Phil Shaw	Juliet Layton	On Target	No Change
SS27	Provide modern and clean public toilets	Reviewing our estate	April 2022	September 2022	Jon Dearing/Mandy Fathers	Mike Evemy	Complete	
SS28		Explore opportunities for 'comfort partnerships'	April 2021	September 2022	Jon Dearing/Mandy Fathers	Mike Evemy	Complete	
SS29		Develop a strategy for the provision of public toilets	April 2022	September 2022	David Stanley/Jon Dearing/Susan Hughes	Mike Evemy	Superseded	
SS30	Review how the Council commissions its Legal Services	Complete the review of legal services	March 2022	May 2022	David Stanley	Joe Harris	Complete	
SS31		Implement Council decision, following review	May 2022	April 2023	David Stanley	Joe Harris	On Target	

Responding to the climate crisis

Our aims	Our actions	Commencement	Date due, Achieved	Officer	Cabinet Member	RAG Rating	

CC1	Tackle the climate crisis at home	Develop support to owner-occupiers to invest in energy efficiency, retrofit and decarbonisation works	September 2021	March 2023	Claire Locke/Chris Crookall-Fallon	Mike McKeown	Off Target, but action being taken to ensure delivery	Report taken to Cabinet on 17th July for decision to set up district wide owner occupier rooftop PV scheme
CC2	Develop, facilitate and deliver an exemplar public engagement programme in relation to carbon reduction and climate change	Develop a public engagement campaign, building on training delivered to the communications team, councillors and the Local Plan Issues and Options engagement.	April 2022	April 2024	Chris Crookall-Fallon	Mike McKeown	On Target	Discussions have progressed regarding alternative roles that the funded post could undertake. Focus is on retrofit. Now being finalised in discussion with senior officers and members before recruitment commences,.
CC3		Promote the opportunity to invest in the Cotswold Climate Investment, CMI, launched in partnership with Abundance Investment	April 2022	June 2022	David Stanley/Chris Crookall-Fallon	Mike McKeown	Complete	
CC4		Work with partners to establish a Climate Action Network in the District, to support locally driven initiatives	May 2022	April 2024	Chris Crookall-Fallon	Mike McKeown	On Target	
CC5		Prepare and agree an EV Charging Point Delivery Plan	October 2020	Achieved	Rob Weaver Claire Locke	Mike McKeown	Complete	A refreshed plan for next stage delivery will now be developed.
CC6		Install EV charging points across the District	October 2020	Phase 1 Completion Autumn 2022 Phase 2 Costings Spring 2022, Rollout Winter 2022	Rob Weaver Claire Locke	Mike McKeown	Off Target, but action being taken to ensure delivery	Significant delays due to previous supplier and more recently the Distribution Network Operator SSE. Final installations under phase one should be installed in the coming weeks at Rissington Road Bourton on the Water and at Trinity Road Cirencester
CC7		Help businesses embed climate change objectives within their operations	September 2020	April 2024 Race to Zero event at Growth Hub in May 2022	Claire Locke/Paul James/CCF	Mike McKeown/Tony Dale	On Target	
CC8	Reduce carbon emissions from our own operations	Work with Ubico to adopt ultra-low emission vehicle technology	March 2021	April 2024	Rob Weaver Scott Williams/Chris Crookall-Fallon	Mike Evemy/Mike McKeown	On Target	Vehicle technology is not yet viable for rural district use. Situation is being kept under review.
CC9		Improve energy efficiency of council premises	March 2021	Phase 1 complete - higher efficiency gas boilers installed at Trinity Rd, LED lighting completed at Moreton Area Centre. Due December 2023	Claire Locke/Chris Crookall-Fallon	Mike Evemy/Mike McKeown	On Target	Proposal for Solar PV on Trinity Road Council offices taken to Cabinet on 17th July and then on to Full Council for approval of funding.
CC10		Secure energy-efficient, 100% green energy for all Council premises, using renewable energy where possible	March 2021	Achieved	Claire Locke/Chris Crookall-Fallon	Mike Evemy/Mike McKeown	Complete	
CC11		Complete Public Sector Decarbonisation scheme at our Leisure centres	March 2021	Achieved	Claire Locke/Chris Crookall Fallon	Mike McKeown/Paul Hodgkinson	Complete	
CC12		Provide electric vehicle charging points at all Council premises	September 2020	Phase 1 completion due autumn 2022 April 2024	Claire Locke	Mike Evemy/Mike McKeown	Off Target, but action being taken to ensure delivery	See CC6
CC13	Achieve a reduction in carbon emissions for the district	Adopt our climate change strategy	September 2020	September 2020	Rob Weaver Claire Locke/Chris Crookall-Fallon	Mike McKeown	Complete	
CC14		Deliver our climate change action plan	September 2020	April 2024	Rob Weaver Claire Locke/Chris Crookall-Fallon	Mike McKeown	Off Target, but action being taken to ensure delivery	

CC15	Increase renewable energy generation within the district	Complete an options appraisal of community energy generation	September 2020	April 2024	Rob Weaver Claire Locke/Chris Crookall-Fallon	Mike McKeown	Off Target and no action has yet been agreed to resolve the situation	Options to support this being considered as part of work to refine priorities over the next four year term
CC16		Secure investment in renewable energy such as photovoltaic farms and electricity generation from our own estate and in partnership with others	April 2024	Investment options considered at Council July 2022	Rob Weaver Claire Locke/Chris Crookall-Fallon	Mike McKeown	Cancelled	
CC17		Support community-led and community-owned renewable energy projects	September 2020	April 2024	Rob Weaver Claire Locke/Chris Crookall-Fallon	Mike McKeown	On Target	As for CC15
CC18		Support neighbourhood-wide climate action	September 2020	April 2024	Rob Weaver Claire Locke/Chris Crookall-Fallon	Mike McKeown	Off Target, but action being taken to ensure delivery	As for CC15
CC19	Take a leadership role on the ecological emergency and nature recovery in the Cotswolds	Adopt and implement the ecological emergency action plan	July 2020	Plan approved July 2020 Cotswold Water Park Nature Recovery Plan published February 2022	Rob Weaver Jon Dearing/Sophia Price	Juliet Layton	Off Target, but action being taken to ensure delivery	Some progress on HRA - mitigation strategy for North Meadow in place so planning applications can be determined. Briefing note on HRA issues across Publica in draft, out for comment at present. Should be completed in August. BNG project moving forward, but main issue is the lack of govt guidance and secondary legislation.
CC20		Create a community and wildlife sanctuary at Chesterton Cemetery	December 2021	March 2023	Claire Locke/Andrew Turner	Mike Evemy	On Target	Works have started although initially delayed due to weather. Some planting is seasonal so the full project won't be completed for sometime.
CC21	Reduce the carbon footprint of our waste and recycling service	Identify the true carbon footprint of our waste and recycling service	April 2022	March 2023	Bill Oddy/Scott Williams	Mike Evemy	On Target	Ongoing
CC22		Consider changes to the waste and recycling service	April 2022	March 2023	Bill Oddy/Scott Williams	Mike Evemy	On Target	Ongoing

Providing socially rented homes

	Our aims	**Our actions**	**Commencement**	**Date due, Achieved**	**Officer**	**Cabinet Member**	**RAG Rating**	
SH1	Deliver social rented and affordable rented accommodation across the district	Deliver a Council led, carbon neutral social housing scheme on the Down Ampney site	January 2022	June 2023	Rob Weaver/Claire Locke/Andrew Turner	Joe Harris	On Target	Delays due to drainage concerns however now progressing with Planning application due to be submitted in September
SH2		Progress a Council led, carbon neutral social housing on Council owned sites in Kemble and/or Southrop	October 2022	March 2024	Rob Weaver/Claire Locke/Andrew Turner	Joe Harris	Cancelled	
SH3		Explore direct delivery options Work with partners to increase the supply of social rented accommodation Investigate the feasibility of setting up a housing company	September 2020	April 2024	Charlie Jackson/ Claire Locke	Joe Harris	On Target	Meetings held with Oxplace and Cottsway housing in July to start to understand different models for providing additionality. Further meetings to be arranged with portfolio holders. Draft job spec for new Housing Strategy role being reviewed and considered as wider review of Planning & Sustainability Team.
SH4	Provide more affordable housing with the emphasis on social rented accommodation	Adopt an affordable housing delivery strategy that sets out clear aims and objectives	June 2020	Achieved	Rob Weaver Claire Locke	Joe Harris	Complete	
SH5	Embed a Housing First approach to tackling homelessness	Maximise the opportunities of the 'housing first' model	July 2020	April 2024	Jon Dearing/Caroline Clissold	Joe Harris	On Target	The initial Support Provider, Aspire have now withdrawn from the project. This element has now been picked up by P3 ensuring the continuation and longevity of the scheme.
SH6		Acquire the property approved in July 2020, and put this to use	July 2020	Achieved	Jon Dearing/Caroline Clissold	Joe Harris	Complete	

SH7		Participate in a joint Gloucestershire bid for additional government funding	August 2020	Achieved	Jon Dearing/Caroline Clissold	Joe Harris	Complete	
SH8	Work with housing providers to improve the affordability and sustainability of developments across the district	Examine our existing assets and identify opportunities for housing delivery	September 2020	Achieved	Rob Weaver Claire Locke	Joe Harris	Complete	
SH9		Identify opportunities to acquire properties for homeless accommodation	July 2020	April 2024	Claire Locke	Joe Harris	On Target	
SH10		Identify and consider sites for delivery of affordable housing	July 2020	April 2024	Charlie Jackson	Joe Harris	On Target	
SH11		Explore modern methods of construction in the context of our rural setting	April 2021	First site (Stockwells, Moreton-Marsh) approved December 2021	Charlie Jackson	Joe Harris	On Target	
SH12		Support young people through a 'rent to buy' scheme	April 2021	April 2024	Jon Dearing	Joe Harris	Superseded	

Make our local plan green to the core

	Our aims	**Our actions**	**Commencement**	**Date due, Achieved**	**Officer**	**Cabinet Member**	**RAG Rating**	
LP1	Develop an updated local plan that delivers our corporate priorities and promotes both carbon neutral development and infrastructure	Identify and allocate land for future housing and businesses.	July 2020	Submit in 2023; Examination 23/24; and adoption 23/24	Charlie Jackson/James Brain	Juliet Layton	On Target	
LP2		Draft new policies and updating existing policies to give effect to new council strategies, such as the economic recovery strategy, the climate and ecological emergency action plans and the renewable energy strategy.			Charlie Jackson/James Brain	Juliet Layton	On Target	
LP3		Explore the potential of natural capital and the Community Infrastructure Levy in relation to delivering natural resilience to mitigate or minimise the risks associated with flooding across the district			Phil Martin/Laurence King Charlie Jackson/James Brain	Lisa Spivey	On Target	A meeting was held 16th June to discuss arranging a sewage summit event in the autumn and a number of actions were agreed to progress this.
LP4		Develop a new Cotswold Design Guide – building for the future in the Cotswolds	March 2022	March 2023	Charlie Jackson/James Brain Jon Dearing/Phil Shaw	Juliet Layton	On Target	No Change
LP5	Develop a coordinated strategy for Cirencester town centre that	Deliver Cirencester town centre masterplan	2020/21	Framework masterplan has been commissioned and is due to be delivered during	Charlie Jackson/James Brain	Juliet Layton	On Target	
LP6		Work with Cirencester Town Council to deliver Cirencester neighbourhood development plan			Charlie Jackson/James Brain	Juliet Layton	On Target	
LP7		Enable appropriate changes of use			Charlie Jackson/James Brain	Juliet Layton	On Target	

	responds positively to the changing nature of the high street	Identify sustainable transport options	2020/21	2022; this will include community and stakeholder engagement	Charlie Jackson/Hannah Fountain	Juliet Layton	On Target	Sustainable Transport Lead Hannah Fountain has left the business. Vacancy was advertised by unfortunately recruitment at the end of July was unsuccessful with a limited number of applicants applying. Candidates that were identified as adequate to take forward to interview declined to progress their application, feeding back that reasons for this related to the salary offered and fixed term nature of the role. Recruitment is temporarily paused to reflect on feedback and review options to move forward. These include exploring secondment opportunities at Gloucestershire County Council, short term contractor use or reviewing the original job role/package initially advertised in order to attract a larger pool of candidates. Options to be costed and presented to Chief Exec and Portfolio
LP8								
LP9	Create a programme of work that demonstrates our commitment to public consultation and engagement in the planning process	Update our local development scheme	August 2020	SCI updated November 2020; LDS updated on May 2021; Commonplace online consultation system procured November 2021	Charlie Jackson/James Brain	Juliet Layton	Complete	
LP10		Update our statement of community involvement			Charlie Jackson/James Brain	Juliet Layton	Complete	
LP11	Deliver a sustainable transport strategy	Promote sustainable methods of transport to reduce reliance on car usage for short journeys	To be confirmed in the publication of our local development scheme	April 2024 planning and implementation	Charlie Jackson/Hannah Fountain	Juliet Layton	Off Target, but action being taken to ensure delivery	See LP8.
LP12		Work with Gloucestershire County Council to provide better sustainable transport routes and options	September 2020	April 2024 planning and implementation	Charlie Jackson/Hannah Fountain	Juliet Layton	Off Target, but action being taken to ensure delivery	See LP8.
LP13		Develop a Sustainable Transport Strategy	November 2020	2023, as part of the Local Plan Submission	Charlie Jackson/Hannah Fountain	Juliet Layton	Off Target, but action being taken to ensure delivery	See LP8.

Support health and wellbeing

	Our aims	**Our actions**	**Commencement**	**Date due, Achieved**	**Officer**	**Cabinet Member**	**RAG Rating**	
HW1		Review and revise our community grants scheme to focus on our priorities	May 2020	Agreed September 2020 Launched February 2021	Rob Weaver Andy Barge/Joseph Walker/Jacqui Wright	Lisa Spivey	Complete	
HW2		Continue to support, develop and communicate the Crowdfund Cotswold Spacehive programme.	September 2020	Programme launched February 2021	Rob Weaver Andy Barge/Joseph Walker/Jacqui Wright	Lisa Spivey	On Target	

HW3 HW4	Encourage resilient, well-connected and active communities that take responsibility for their own health and wellbeing goals	Coordinate an asset based community development approach	September 2020	April 2024	Andy Barge/Jacqui Wright	Lisa Spivey	On Target	**Comunity Building** - held Community Afternoon Tea for the CHEQS villages (Coln St Aldwyns, Hatherop, Eastleach, Quenington and Southrop)to whhc we also invited the local PCSP. 20 people came along and were pleased to see a police officer to discuss any concerns they have with rural crime. Everyone interacted well and connected with people they didn't know, some had lived in the village more than 15 years and didn't know each other.We went a way with some great idea for the village that we will follwo up with residents. - Continued work on' Grow Your Own' scheme and Community Growing Schemes, sourced potential partners and researched established schemes for ideas.Visited Down to Earth Stroud who then agreed to supply volunteers and teachers - connected them with 3 potential localities for Community Growing Scheme. - Requested basic 6 weeks course for growing own food to be funded by Cirencester College Adult Education, which has now been agreed and aiming for a September start. - Visit to Roots and Seeds organised and Glos Wildlife trust meeting to discuss GYO/CGS plans and ideas to get them on board. - started more community engagement/door knocking in Sherborne and tour of the estate. GROUP VISITS • Barton Senior Citizen Club talk about CB. • Attended Getting Connected final session in Bourton. • Dementia café in Stow to discuss role as a CB. • Visited the GRCC Wellbeing café in Morton and viewed community allotment. • Attended the GRCC wellbeing café in Stow and spoke to Pets as Therapy. • Attended Tetbury Friendship café to deliver chair workout, discussed Digital Inclusion course possibly in the autumn. - Thursday night Table Tennis group –Northleach- club set up for teenagers by some enthusiastic Mums - Wake and Shake morning sessions in June at the primary school in Northleach - GP connections, social prescribers – giving support for some patients. - Engaged with a resident to set up a Womens Circle in Northleach - Encourage Northleach Facebook plant swap - Growth and development of One Moreton group – SUMMER GO WILD EVENT
		Host regular community forums with community groups and community leaders	July 2020	April 2024	Andy Barge/Jacqui Wright	Lisa Spivey/Claire Bloomer	On Target	**Cotswold Community Network** •Facilitated, organised and chaired CCN group/meetings, distributed prompt and relevant communications, made introductions for partnership working, promoted community activity and opportunities and shared details about CDC Community Wellbeing activity. Actively increased the membership number to 114 individuals and over 60 organisations. •New Logo and design of CCN comms produced. •Organised Guest speakers to attend CCN including Barnwood Trust, National Trust, Recovery College, Ciren community development team and Fear- Less. and linked them in to other organisations for collaborative work in the community on a variety of projects - several 'thank you' emails have been sent and excellent feedback about the CCN

HW5		Continue to raise the profile of the Community Safety Partnership to reduce the fear of crime and ensure residents know how, and where, to get support	July 2020	April 2024	Andy Barge/Jacqui Wright	Lisa Spivey/Claire Bloomer	On Target	**Safer Streets Funding** Shortlisting of Safer Streets Cotswolds proposals has been completed. The next stage will be to visit the shortlisted areas. After the visits and more local engagement, we will decide which areas will receive the improvements to make them safer. We have already supported one proposal, which will install several CCTV cameras in the North of the district in Weston Sub-Edge. The area has seen an increase in crime recently and the additional cameras will also useful for the police to monitor who is coming in and out of the district. The police will have access to the cameras. The first of three community events has taken place on 31st May in Cirencester, St Michael's park. Colleagues from Trading standards, Bromford housing, GDASS, GRCC, Town and Parish councils, Clean and Green Team, Early Help, The Churn and other local organisations attended the event. World Jungle provided workshops on circus skills, drumming, giant bubbles, graffiti, crafts etc. There was a climbing wall, Sportily offered mini sports games and activities and Bloodhound engineering workshops. Parents/family members were engaged whilst they were in queues for activities about the community safety survey that the CSP has launched, its purpose and asked approx. 40 people to complete it via their mobiles. Discussion around safer streets and the results from the public consultation. Over 100 families joined the event. Over 40 adults agreed to complete the survey. Anecdotally families were thoroughly engaged in the activities, very happy to have a free event during half term and were generally happy with where they lived. Some were able to compare with other places they had lived such as Birmingham and London which they felt were much less safe. Deputy PCC Nick Evans and his daughter joined the event. Partner agencies felt that the event was very helpful and successful. Cirencester Town Council have approached us since the event about running a joint event in 2024 combining community health and wellbeing agendas. A meeting has been arranged to explore this. The review of CSP priorities will be done in Q2. We have launched a community safety survey whihc will be live until End of september 23 https://cotswold.us5.list-manage.com/track/click?u=ab7a7e62881dc95c541265556&id=1cd3e8a14f&e=4841ad6a32
HW6		Complete a review of our leisure services	July 2020	May 2022	Rob Weaver / Scott Williams	Paul Hodgkinson	Complete	
HW7		Deliver the Council's Leisure strategy.	November 2020	April 2024	Rob Weaver / Scott Williams	Paul Hodgkinson	On Target	Captured in Active Cotswolds Programme
HW8		Deliver capital programme to replace fitness equipment across the Leisure estate	March 2022	September 2022	Bill Oddy/Stuart Wilson	Paul Hodgkinson	Complete	
HW9		Undertake a Leisure and Culture management options appraisal to inform decision on future service delivery, and implement the agreed model(s).	May 2022	July 2023	Bill Oddy/Scott Williams	Paul Hodgkinson	Complete	
HW10		Develop a updated Playing Pitch Strategy (PPS) to inform planning and investment in pitch-based facilities	February 2022	December 2022	Scott Williams/Rachel Biles	Paul Hodgkinson	Off Target, but action being taken to ensure delivery	Final version received and signed off by Sport England, aiming to bring to September's Cabinet meeting for approval and adoption.

HW11	Promote healthy lifestyles, fun and self-care for all ages	Improve referrals into physical activity and fitness based programmes, both in our Leisure Centres but also in the community.	February 2023	April 2024	Andy Barge/Rachel Biles/Jacqui Wright	Paul Hodgkinson	On Target	Updates are captured as well in Active Cotswold Action Plan. Currently exploring additional resource in form of an instructor who can deliver more regular classes to existing groups. WE have found that the easiest way of getting people to move more is to go where they are already meeting for other activities. At the moment we only have capacity to deliver taster sessions. Groups would be keen for the classes to continue but we would need more manpower to enable this. Partnership agreement with Motivator will start in July- we will have a district membership to access his Motivation Club online content. Currently working on an access scheme. Active Cotswold event planned for 1st October at Bingham hall in Cirencester. Mr Motivator will attend the event as headliner. The event will also bring together local instructors, clubs and specific schemes like Falls prevention and will offer taster sessions on the day. Other programs in place: WELLBEING WALKS COMMUNITY FIT KIT CHAIR EXERCISE GROUPS YOU CAN MOVE WALKING SPORTS- WALKING NETBALL WALKING FOOTBALL LIFE CARDS FI DATABASE EXERCISE REFERRALS
HW12	Improve equal access to quality services across the district	Use targeted initiatives to tackle both childhood poverty and food poverty in the district, so more children and vulnerable families have access to nutritious food	September 2020	Holiday food scheme from Summer 2021, April 2024	Andy Barge/Jacqui Wright	Claire Bloomer	On Target	Have run another successful HAF programme at Easter and GCC have suggested (not confirmed yet) that we have hit the highest percentage of FSM's children, than any other district at 72% - our target is 50%. Making great inroads to increasing engagement with schools, in partnership with Bloodhound Cots Community Connectors, also reaching out to more partner organisations, to promote the HAF project to their clients. **Cotswold Food Network** Continued to work and meet with a small working group to develop our thinking about a possible Food Network for the district. Have supported Feeding Glos with their district launch in June where we have presented on Community Wellbeing and Climate Action work (Jacqui Wright and Chris Crookall-Fallon). Attendees have considered a possible network and we will take all the feedback and consider next steps in July. Link have been made with the Farming and Wildlife Advisory Group South West who will support us with the 'row your own' scheme (see update above).
HW13		Work with relevant services and organisations to provide more – and better – quality healthcare services	September 2020	April 2024	Andy Barge/Jacqui Wright	Paul Hodgkinson	On Target	We have worked with the ILP on a plan to spend the SLC funding that we have received last Q (£149k). It has been decided to support the Cotswold Chat mental health support programme for young people delivered by Young Gloucestershire (just under £50k). The remaining funding will be used to support families and young people and work is underway to identify specific interventions. This work includes several workshops with service providers (public sector and voluntary sector) to build better relationships, map current services, identify gaps and increase partnership working leading to new interventions/projects. The first workshop was held in June, with two more to follow in October.
HW14		Continue to invest in dementia-friendly communities, improve understanding and communication, and reduce loneliness and isolation	September 2020	April 2024	Andy Barge/Jacqui Wright	Claire Bloomer	On Target	Supported Dementia Friendly Communities - DF Bourton group and DAA. Encouraged DFB to branch out successfully and they are now known as 'Dementia Friendly North Cotswolds' and have set up a Dementia Cafe in Stow. I forward them regular updates about DAA and Dementia training opportunities.
HW15		Work with the Cotswold Youth Network to increase investment in, and support for, youth engagement work	July 2020	March 2023	Andy Barge/Jacqui Wright	Paul Hodgkinson	On Target	The ILP work is focussing on support for young people (update above (row 112)). Ongoing work with the youth network and HAF. No other specific updates.

HW16		Work with partners to implement four Changing Places Toilet facilities	September 2021	April 2023	Paul James	Claire Bloomer	On Target	Cotswold Farm Park completed. Abbey Grounds, Cirencester almost complete. Birdland and Cotswold Country Park and Beach are in the planning and procurement stages and will be delivered early in 2024.
HW17	Promote both mental and physical health equally, to increase awareness of mental health issues and improve the community response to people in crisis	Increase the number of people trained in mental health first aid and suicide prevention	September 2020	March 2023	Rob Weaver Andy Barge/Jacqui Wright	Paul Hodgkinson	On Target	
HW18		Provide targeted mental health campaigns and support	September 2020	April 2024	Andy Barge/Jacqui Wright	Paul Hodgkinson	On Target	•Distributed Mental Health communications re: MH Awareness Week and Stress Awareness. Promotion of Men's mental health courses from Ciren college and Leisure centre men's group. •Represented CDC in MHELO group and undertook relevant action points from meetings - encouraged more involvement from Cotswold residents and promoting their work through CCN. •'Cotswold Chat' funded for one more year through SLC grant to provide MH support to local young people delivered by Young Gloucestershire
HW19		Promote mental health activities and initiatives	September 2020	April 2024	Andy Barge/Jacqui Wright	Paul Hodgkinson	On Target	
HW20		Continue to deliver the 'hidden harm' project and targeted work to raise awareness of domestic abuse, in partnership with Gloucestershire Domestic Abuse Support Service	July 2020	April 2024	Andy Barge/Jacqui Wright	Lisa Spivey/Claire Bloomer	On Target	CDC has taken the lead for the Rural Domestic Abuse Champions Network. The contract has been completed and started on first June. GDASS have started recruitment and the advert is now live. It is hoped that the new postholder will start in September 2023.
HW21		Work with the DWP, businesses, education and the voluntary sector to create more employment and learning opportunities for young people	September 2020	March 2023	Andy Barge/Jacqui Wright	Paul Hodgkinson	Complete	
HW22	Ensure our housing and built environments enable residents to live healthy lives	Plan places with active travel and high-quality green infrastructure	October 2020	April 2023	Charlie Jackson/James Brain/Hannah Fountain/Sophia Price	Juliet Layton	On Target	
HW23		Develop design codes that focus on climate change and protect people from overheating risk	October 2020	April 2023	Charlie Jackson/James Brain/Chris Crookhall Fallon/Sophia Price	Juliet Layton	On Target	
HW24		Develop policies for dementia-friendly homes	February 2021	April 2023	Charlie Jackson/James Brain	Juliet Layton	On Target	
HW25		Review local plan policies to facilitate healthy place shaping	October 2020	April 2023	Charlie Jackson/James Brain	Juliet Layton	On Target	
HW26		Deliver health and wellbeing initiatives through the local plan	October 2020	April 2023	Charlie Jackson/James Brain	Juliet Layton	On Target	
HW27	Support residents through the 'cost of living crisis', recognising the disproportionate impact on low income households	Roll out the new £150 Council Tax rebate promptly	April 2022	November 2022	Jon Dearing/Mandy Fathers	Mike Evemy	Complete	

Enable a vibrant economy

Our aims	Our actions	Commencement	Date due, Achieved	Officer	Cabinet Member	RAG Rating	

VE1	Use our investments and assets to boost the local economy	Accelerate the Recovery Investment Fund to bring large scale investments to the Capital Investment Programme Board in order to reach our £1m Revenue target	December 2021	Strategy goes to Council in May 2022 Investment decisions July 2022	David Stanley/ Paul James/Chris Crookall-Fallon	Tony Dale	Cancelled	
VE2		Focus on growing commercial revenues in the Council that underpin a 'Green Evolution'	December 2021	Car Parking fees revised for 2022/23 April 2024	David Stanley	Tony Dale	On Hold	
VE3		Invest in local projects and development opportunities	September 2020	April 2024	Andy Barge/Paul James	Tony Dale	On Target	Investment opportunities, including in Cirencester town centre, continue to be looked at on a case by case basis.
VE4		Use our assets to generate jobs locally	April 2021	April 2024	Claire Locke/Paul James	Tony Dale	On Target	Several potential opportunities for Trinity Road being considered. Position with the Old Station and OMH as per Q4.
VE5	Support successful businesses in the visitor economy with higher visitor spend and footfall spread across the District rather than just the 'honeypot' locations	Deliver against the six priorities set out in the Cotswold Tourism destination management plan	September 2020	April 2024	Andy Barge/Chris Jackson	Tony Dale	On Target	
VE6		Help to develop high quality visitor experiences	September 2020	April 2024 'Days Out' published March 2022	Andy Barge/Chris Jackson	Tony Dale	On Target	
VE7		Increase tourism's contribution to the economic, social and environmental sustainability of our communities	April 2021	April 2024 19 Training videos created April 2021 Business survey February 2022, to inform actions in 2022/23	Andy Barge/Chris Jackson	Tony Dale	On Target	
VE8	Develop strong networks, collaboration and partnerships with businesses and organisations	Work with partners to support existing businesses and encourage the growth of start-ups	July 2020	April 2024	Rob Weaver Andy Barge/Paul James	Tony Dale	On Target	Cabinet approved funding for the Growth Hub in March 2023. The legal agreement with them requires them to focus on start-ups and provide an outreach service across the District and includes a target for the number of new businesses created.
VE9		Build a reputation as a business-friendly council	July 2020	April 2024	Andy Barge/Paul James	Tony Dale	On Target	Business Matters continues to be issued monthly. Business Engagement visits have restarted post-election.
VE10	Develop a high value, highly skilled, low environmental impact economy that includes agritech, digital/cyber, medical equipment and environmental technologies	Work with key sectors to create new highly skilled jobs	September 2020	April 2024	Andy Barge/Paul James	Tony Dale	On Target	Farm491 funding for new offices agreed from UKSPF. Proposals for a Centre for Sustainable Aviation appear to be gathering momentum. Rural England Prosperity Funding has now been agreed, so will create more opportunities.
VE11		Secure the provision and occupation of new commercial space	March 2021	visions agreed for Local Plan special policy areas by March 2023	Andy Barge/Paul James	Tony Dale	On Target	No significant update. Steadings employment land planning application awaiting resubmission to take into account the comments from planning officers. RAU Innovation Village moving forward but still some way from delivery.
VE12	Help our town centres recover from COVID-19 and in the face of changing shopping habits	Help towns create long-term plans where needed, such as the Cirencester town centre masterplan	September 2020	April 2024 Masterplan due for completion December 2022	Charlie Jackson/James Brain	Tony Dale/Juliet Layton	On Target	
VE13		Support businesses to enhance their digital presence	July 2020	March 2022	Andy Barge/Paul James	Tony Dale	Complete	Completed.
VE14		Develop a 'shop local' campaign to encourage residents to support local businesses	July 2020	April 2024	Andy Barge/Paul James	Tony Dale	Complete	Completed.
VE15	Attract investment in infrastructure	Work with Fastershire to address broadband market failure	Rolled forward from previous Corporate Plan	April 2024	Robert Weaver/Paul James	Tony Dale	On Target	County Council Digital Household Scheme has gone out to tender.

	Attract investment in infrastructure							
VE16		Support completion of the A417 'missing link'	September 2020	April 2024: Development Consent Order hearing underway January 2022	Jon Dearing/Phil Shaw	Tony Dale	On Target	
VE17	Offer better qualifications for our young people	Work with our partners to ensure our young people have the skills they need to secure employment in the district	September 2020	April 2024 Cotswold New Start launched October 2021	Andy Barge/Paul James/Jacqui Wright	Tony Dale	Off Target, but action being taken to ensure delivery	Cirencester College T level building now completed. Discussions being held with Cirencester College about linking with sustainable aviation businesses in the district in terms of skills and training. UKSPF funding includes provision in Year 3 (2024/25) to support those furthest from the labour market.
VE18		Work with GFirstLEP to improve the Growth Hub provision in the North Cotswolds	January 2021	April 2024 Innovation Lab opening in Chipping Campden Spring/Summer 2022	Andy Barge/Paul James	Tony Dale	On Target	Legal agreement for UKSPF funding for Growth Hub requires them to operate an outreach service covering the whole district. It is anticipated that for the north of the district, the Moreton Area Office will be used as a base.
VE19	Ensure the benefits of the internet and digital technologies are accessible to everyone in the district	Establish needs	October 2020	December 2020	Andy Barge/Paul James	Tony Dale	Complete	Completed.
VE20		Identify partners that can deliver improvements	January 2020	March 2021	Andy Barge/Paul James	Tony Dale	Complete	Completed.
VE21		Develop and implement an action plan to improve digital inclusion	June 2021	April 2024	Andy Barge/Paul James	Tony Dale	Off Target, but action being taken to ensure delivery	Work is progressing through partnership activity, although there is limited collective capacity to make headway. A headline report outlines eight recommendations to help tackle the digital divide and frames a range of questions revolving around next steps. This is supported by digital exclusion risk mapping, community asset mapping (what's out there already) and a 'what we know about closing the digital divide report. Focus on competing priorities, such as UKSPF and REPF has slowed progress on this. https://www.digitaldivides.co.uk



COTSWOLD
DISTRICT COUNCIL

COUNCIL PRIORITIES REPORT

April 2023 - June 2023

Cotswold District Council Corporate Plan 2020-24

Our Aim

To rebuild the Council so it can be proactive and responsive to the needs of our residents and businesses in a fast changing environment, building for the future whilst respecting our heritage

Our Priorities



Our Principles

- rebuilding trust and confidence in the council by promoting a culture of openness and transparency
- providing value for money for our residents and businesses by using our resources wisely and investing in the district's fabric and future
- listening to the needs of our community and acting on what we hear

Executive Summary Highlights

- Cabinet approved funding for the Growth Hub in March 2023. The legal agreement requires them to focus on start-ups and provide an outreach service across the District and includes a target for the number of new businesses created.
- The Holiday Activity Food programme continues to be a success and GCC have suggested (not confirmed yet) that we have hit the highest percentage of FSM's children, than any other district
- The Changing Places Toilet Facilities are complete at Cotswold Farm Park. Abbey Grounds, Cirencester is almost complete. Birdland and Cotswold Country Park and Beach are in the planning and procurement stages and will be delivered early in 2024.
- The Council and Bromford Housing have entered into a Collaboration Agreement to deliver the Down Ampney housing development. There have been delays due to drainage concerns however now progressing with Planning application due to be submitted in September
- The A417 Missing Link scheme was approved in November 2022; and Kier Highways has been appointed as the main contractor. The £460m project is designed to reduce congestion and improve road safety on this important link between Cirencester and Gloucester and, more widely, the M4 and M5 motorways. Kier have started on site with various preparatory works and are presenting to the next meeting of the Cotswold Economic Advisory Group in September.
- Welcome letter & newsletter emailed to new and returning Town & Parish councillors in June 2023. Virtual social media training booked for August with next face to face forums in September.
- Tender process for Cirencester Access and Movement Study closed 24th April.
- Shortlisting of Safer Streets Cotswolds proposals has been completed. The next stage will be to visit the shortlisted areas. After the visits and more local engagement, we will decide which areas will receive the improvements to make them safer.
- A new project plan for street signs, setting out number, location, cost and timescales is being prepared for the 2023/24 roll out.

Deliver services to the highest standard

The Context

The Council aims to create services that are inclusive and flexible which meet the diverse and changing needs of its residents and communities. To achieve this, it will be important to listen to residents to understand what is important to them, identify the areas in which they need support, and adapt. In the context of reducing budgets over the last ten years and the phasing out of incentivised income streams such as New Homes Bonus, which has been further exacerbated by the impact of Covid-19, the Council will need to take a strategic approach, and make the best use of the available resources.

The Council will work with a range of public and private sector partners to help deliver its aims and objectives and to provide services seamlessly. The emphasis will be on efficiency and effectiveness whilst remaining true to the Council's commitments on climate change and a green economy.

Actions we are taking

Following a refresh and public consultation of the Council's draft budget proposals for 2023-24 last quarter, a summary of results was presented to Cabinet in January 2023. The results from this consultation were taken into consideration prior to agreement of the Revenue Budget, Capital Programme and MTFS agreed on the 15 February 2023.

The key strategic aim of 'Clean and Green' is to reduce enviro-crime within the District, and deliver the benefit of a high quality environment where economic growth is supported and where the Council positively engages with the community to not only solve immediate issues, but to prevent further recurrences. During Q1, there were 25 requests for litter picks from communities with litter picks taking place across the district with over 136 people involved. Quarter One saw the start of the anti-dog fouling campaign including distributing dog waste bag dispensers to parishes. Work has been continuing to prevent anti-social behaviour at the Water Park building relationships with the manager of Cotswold Beach and the police.

Phase Two elements of the Water Park Strategy include projects to make it easier for people to walk and cycle around the area, which disperses visitors more widely and enables people to be more physically active.

Funded projects include a new foot/cycle path Neigh Bridge that is largely complete but outstanding issues are still being pursued with GCC in liaison with the Cotswold Lakes Trust. Work is also underway to deliver 46 new cycle standings in Fairford, Lechlade and South Cerney. Contractor is working closely with local organisations and with Parish and Town Council representatives to agree suitable locations.

A new section of bridleway under Wildmoor Lane has been commissioned and will be delivered by GCC Rights of Way team following agreement from landowner to dedicate required land take.

The on-going objective to deliver a crossing on the Spine Road is still seen as a critical project and efforts are focused on maintaining the momentum gained on key steps already achieved. Gloucestershire County Council (GCC) have made a request for Community Infrastructure Levy (CIL) funding which is currently being evaluated for compliance with CIL rules.

Work is also under way to agree a Memorandum of Understanding with Wiltshire Council regarding both Cotswold and Wiltshire Council's approach to local plan policy development which takes an holistic approach to the Water Park area.

Whilst the provision of toilets is not a statutory function, the Council provides 15 public conveniences across the District which support shoppers and tourism, and prevents negative environmental health impacts from lack of accessibility. At the cabinet meeting 6 February 2023 the decision was made to increase the 10 charged units to 40p to start 1 April as a result of current income only providing one third of the required budget to maintain the facilities. In addition, Cabinet delegated the decision to install cash and card payment facilities on a site-by-site basis to the Assistant Director for Resident Services. Work is underway to install card readers at all of the charged public toilets. Two out of the 10 charged sites already have card readers with a future eight sites planned in the next few months.

The overarching aim of the improvement work in the Planning service is to provide a trusted, inclusive and transparent planning service. In that regard performance has improved markedly over the last year or so. Following the work already undertaken to the pre-application service, validation checklist, fee schedule, communication with applicants and the timeliness of the communication at key stages of the process the recent priority has been the reduction in backlogs in the enforcement function. This work is preparatory to implementing the new processes in that element of the service starting with improvements in the front end for registering enforcement issues and then a series of customer touch points and a customer journey to help keep customers informed. This project is expected to deliver a reduction in repeat customer contact/chasing, as well as a reduction in the number of non-breach cases from improved online reporting facilities and back office triage.

The further improvement works arising from the PAS report were agreed by Cabinet in June and will be added to the action plan with delivery scheduled to be completed late 2023/early 2024. The next main piece of work following completion of the PAS related elements will be improving the IT platform.

Respond to the climate crisis

The Context

Q1 2023/24 did not feature much development in national policy, but there were developments relating to national climate performance which are relevant to the Council's climate action ambitions.

Following on from the Committee of Climate Change's annual report in June, there are two items of particular relevance to the Council; a coherent public engagement strategy on climate action is long overdue and needed to empower and inform households and communities to make low-carbon choices and; planning policy needs radical reform to support Net Zero, including the overarching requirement that all planning decisions must be taken giving full regard to the imperative of Net Zero.

Actions we are taking

The Council's Climate Emergency Strategy of September 2020 identified the Council's different spheres of influence over carbon emissions in the District. These range from relatively easier interventions with lower impact (e.g. direct and indirect control of the Council's own operations), through to relatively harder interventions with potentially much higher impact (e.g. enabling District-wide action and engaging with all stakeholders).

'Direct Control' actions

Changes now underway at Trinity Road will increase space efficiency reducing the Council's office's physical and carbon footprint. The business case and Council investment decision for solar PV and battery storage at Trinity Road and one other tenanted site is being brought to Cabinet and Council in July. If successful other viable business cases should come forward for other Council-owned premises. The recruitment of a sustainable transport specialist is underway, whose duties will focus on policy development for the Local Plan partial update, but who will also complete the sustainable travel plan for the Trinity Road office. This plan aims to help staff, and by extension the Council itself, to reduce both the cost and carbon emissions of commuting.

'Indirect Control' actions

Waste and recycling collection, aside from being the Council's single largest source of emissions, presents all councils with huge challenges and potential opportunities in environment, the climate emergency, and digital services. The Environmental Services Innovation Programme (ESIP), a partnership between Cotswold, Forest of Dean and West Oxfordshire District Councils, Publica and Ubico, has reducing carbon emissions as one of six main priority areas for shared innovation projects. The leisure and cultural services provider procurement which completed in Q4 2022 will see the new service provider taking over in Q2, and Council staff are working to ensure that low carbon energy systems (solar, heat pumps) installed under the Public Sector Decarbonisation Programme in March 2022 are ready to be taken over by the incoming service provider to ensure their optimal performance.

'Place Shaping' actions

Work is underway to build the necessary evidence base for draft climate policies for the Local Plan (LP) partial update, taking account of feedback from the Regulation 18 public consultation, as well as the results of recent examinations of other authorities' Local Plans which contain ambitious climate policies. Sustainable transport consultants are drafting LP policies in line with the findings of the district-wide Sustainable Transport Strategy research. Consultants have been selected to deliver an updated evidence base and policies for renewable energy in the district, and procurement is being prepared for consultants to deliver an evidence base and policies for sustainable construction, a key plank of the updated LP. A district-wide carbon emissions 'pathways' study, which builds on similar work already undertaken for the Cotswold National Landscape, is due to report at the start of Q2. The study will establish how steeply emissions need to fall in each sector of the District's economy in order to meet international and national net zero carbon commitments. In addition the updated Cotswold Design Code will be procured during Q2.

The electric vehicle charge point business case was agreed by Cabinet in March 2022 for Council-owned car parks providing 20 charging connections. Following the replacement of outdated EVCPs at Old Market Way car park, Moreton-in-Marsh and The Beeches car park, Cirencester, further installations are currently running behind schedule due principally to delays in responses from electricity distribution network operators (DNOs) and extreme pressures on all EVCP installers who are trying to keep pace with the rapid growth of the EVCP market. It is now expected that the Rissington Road and Trinity Road car park charge points will be installed at the start of Q2, and funding secured from the DfT's On-Street Residential Charging Scheme will enable local residents without off-street parking to charge overnight and outside of office hours.

'District-wide enabling' actions

Retrofitting homes to reduce costs, energy consumption and carbon emissions is an essential component of national emissions reduction, but remains a huge challenge. The announcements of the energy security strategy (Powering up Britain) include some measures that support home energy retrofit, but the national retrofit strategy, such as it is, remains the preserve of a non-statutory body (the Construction Leadership Council) and the national retrofit hub is in a very early stage of development.

The Stroud District Council-led county partnership developing retrofit support is now unlikely to result in a delivery vehicle, as had been originally intended. This changes the debate over how Cotswold District Council should proceed with retrofit support to residents.

The provision of support to residents for selecting and purchasing rooftop solar PV systems and related equipment is being taken to Cabinet and Council in July, and a communications and promotion campaign is in development.

'Engaging' actions

This remains a very important part of the Council's overall climate crisis response, and there is much work to do to help build confidence and momentum among all District-wide stakeholders, from residents to businesses and public sector bodies. We are now working on the creation of a District-wide network of individuals and organisations motivated by the climate challenge, and researching user needs in order to provide real value, and aiming to replicate the success of West Oxfordshire District Council's 'Green Light' communications platform.

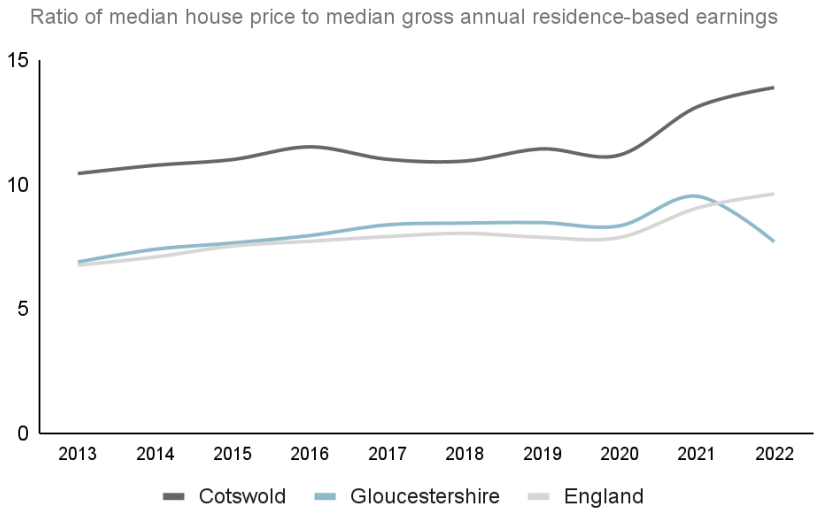
Provide socially rented homes

The Context

The high quality natural and built environment makes the District a desirable place to live. Cotswold District has a high number of properties owned outright (37.8%, vs 30.6% national average) reflecting the attractiveness of the District as a place to retire or to purchase a second home.

House prices and rents are relatively high. At the end of September 2022, the median property price in Cotswold District was £400,000 compared to £275,000 in England. House prices are falling due to the cost of living crisis, while rents are increasing. There is a shortage of good quality rented accommodation that is genuinely affordable. Affordable housing helps to meet the District's housing needs and can include low cost home ownership or rented accommodation which typically has a discount of around 20% on the market rent, however this may still not be truly affordable for some residents. Social rented homes have a rent that is lower than affordable rent and therefore provides homes for those on lower incomes or in receipt of full Housing Benefit.

The relatively high house prices and increasingly high rents, coupled with the lower than average earnings from local jobs, means housing affordability is a significant challenge for residents in the District and is being made worse by the cost of living crisis.



Actions we are taking

The Council's Affordable Housing Delivery Strategy and action plan was adopted by Cabinet on 8 February 2021 and sets out the delivery strategy for the Council to accelerate provision of social rented and affordable homes for local people. The current focus is to facilitate the affordable housing identified within the Local Plan and through rural exception sites and community-led housing opportunities, and to work with Housing Associations to maximise affordable housing delivery. The Council plans to go further and bring forward additional affordable homes through enabling and direct intervention which may include provision of land and other funding. In addition, any development the Council acquires or builds must be carbon zero in support of the Council's Climate Change emergency commitment. Although this will increase the cost of affordable housing, it will reduce ongoing revenue costs for tenants. Based on the outcomes from the councillor workshop in October 2020,

discussions with local Registered Providers (RPs), and a review of delivery options, Officers recommended that the Council establish a formal partnership with one lead Registered Provider.

An expressions of interest exercise resulted in Bromford being selected as the preferred RP, with the Kemble site to be taken forward via a Contractual Joint Venture (JV). Due to challenges with the site including ecological challenges, the Kemble site was paused, and an alternative scheme on the derelict Broadleaze site at Down Ampney is being prepared for delivery first. Following a review of the Kemble site in the context of the cost of living crisis, the substantial subsidy that would be needed to deliver these homes and the ecological constraints, it was concluded that housing development on this site is not viable. In January 2023, Cabinet agreed to lease the land for use as allotments and community gardens. A revised valuation of the land based on its redesignation to community gardens has been undertaken to facilitate a lease agreement.

The Council and Bromford are continuing to work in partnership to deliver carbon zero affordable homes on the Down Ampney site and formally entered into a Collaboration Agreement in November 2022. A communication strategy has been developed to ensure appropriate engagement with all stakeholders including the Parish Council and local residents and people. A planned programme of consultation commenced on 10 October 2022 and a second round of consultation to share the detailed designs, house types and layouts took place in March ahead of a planning application being submitted. It has previously been highlighted that the planning application would be affected by the Habitat Regulations Assessment requirements as the site is within the Zone of Influence for North Meadow, Cricklade. This means the planning application could not be determined until a Mitigation Strategy was in place. Swindon Borough Council have now completed the mitigation strategy so applications in the affected area can now be processed. There have been some delays with the submission of the Planning Application as concerns regarding drainage were raised during the public consultation. It has taken some time to work through these issues. However a solution has now been identified and it is hoped Bromford will be submitting the planning application shortly.

The Old station, Sheep street was previously assessed for service provision such as homelessness accommodation and other housing options but the conversion was found to be unaffordable. In December 2022, Cabinet agreed to develop the Old Station and Memorial Cottages for cultural and community use, working with local organisations to produce detailed designs, obtain quotations for the renovations and seek external grant funding. If sufficient external funding can be secured a report will be brought back to Council for agreement to proceed. However, if insufficient funding can't be secured to achieve a minimum break even position for the Council, then the Council will need to consider other options such as the sale of the property. The Council is currently working with local organisations who are applying for external grant funding to support the delivery of this renovation and conversion and some funding has now been secured although there is currently a funding gap. New Brewery Arts have developed a couple of alternative designs for the renovation and conversion of the building and Listed Building Consent has been applied for. A structural survey revealed a gable end wall was unstable and therefore structural scaffolding has been installed to render the wall safe until building works can take place. Procurement of the wall repair works is due to commence in July.

The Stockwells regeneration scheme is being delivered by Bromford Housing Association and represents an opportunity for the Council and Bromford to create the first social rented, Modern Methods of Construction (MMC) net zero homes within the District. With funding support from the Council, Air Source Heat Pumps will replace traditional gas boilers, reducing CO2 emissions from heating and hot water by around 80%. In addition, the introduction of a large solar PV system will reduce net carbon emissions of the development to zero. Developers started on site in Q2 2022-23 and expect to complete during the summer 2023.

In March 2021, the Council allocated commuted sums grants to two projects to deliver low carbon affordable housing. A sum of £478,500 was allocated to provide 100% social rent on a scheme of 15 units at Davies Rd, Moreton in Marsh; previously an open market scheme with 40% affordable housing only. A further allocation of £102,000 will be used to enhance the environmental sustainability of the homes. Cottsway Housing Association successfully submitted an application to Homes England for match funding.

The second project has an allocation of approximately £332,000 from commuted sums grants for a scheme of 14 homes at Sunground, Avening, a rural exception site which will be 100% low carbon affordable housing. The scheme has received Homes England funding through Bromford which is developing the scheme on behalf of Gloucestershire Rural Housing Association (GRHA). The scheme will provide nine social rented and five shared ownership homes for local people, incorporating rainwater harvesting, air-source heating, solar panels and biodiversity measures.

Make our local plan green to the core

The Context

In July 2019 the Council declared a Climate Change Emergency, and a year later made a further commitment to the environment by declaring an Ecological Emergency. Key to the commitments made in both emergencies is the partial update to the Local Plan and making it green to the core.

Since the adoption of the Local Plan in August 2018, the government's National Planning Policy Framework has introduced new guidance that increases the importance of climate change adaptation and mitigation and the role that Local Plans play. This is in addition to the Clean Growth Strategy, Environment Act (2021) and UK Net Zero Strategy, which represent the Government's ambition to combat climate change and give the environment a bigger mandate.

The Government is currently reforming the English planning system, through its Levelling Up and Regeneration Bill. This will radically alter how the Council will prepare future local plans. These reforms are subject to the Bill achieving Royal Assent which is expected in late 2024. The Government has explained that it will put in place arrangements to smooth the transition from the existing plan making process and the new process, therefore allowing the Council sufficient time to update its Local Plan before embarking on a full local plan update under the new planning system from 2025.

Actions we are taking

At a meeting of Full Council in June 2020, members unanimously resolved to partially update the Local Plan 2011-2031. A review of Local Plan policies is the first step in the Local Plan process and reveals which policies can be left as they are and which policies are likely to need updating. The process of updating the Local Plan will consider the options available to the Council and local communities. Along with international and national pledges made by the Government, the update will reflect the work being undertaken by other services across the organisation.

The Local Plan can be seen as the glue that holds various corporate objectives together and provides physical action; it also translates national legislation to a local level. The partial update of the Local Plan will aid the building of new homes, in the right places, with suitable green infrastructure that promotes the transition to carbon neutrality. It will assist in providing services and opportunities to enhance the area both for the wellbeing of the people living here as well as its visitors. It will also provide the tools to enhance, create and protect the local environment and the biodiversity of the District and its neighbours.

The Local Development Scheme (LDS) is published on the Council's website, and sets out key stages in the local plan making process. This document will be updated in Autumn 2023 which will set out the next milestones and will indicate when the next formal public consultation will be held. A Local Plan Programme Board, that has membership of all political parties, is monitoring the progress of the Local Plan partial update.

An early stage Local Plan was consulted on in 2022. Overall, the consultation was a great success with approximately 7,500 individual respondents making 2,900 responses, more than any previous Local Plan Regulation 18 (issues and options) consultation that the Council has undertaken. The consultation generated useful remarks that are helping to shape the emerging Local Plan, as well as ideas as to how to make the next consultation even better. A summary of the consultation responses was presented to Cabinet at its meeting in July 2022.

The online consultation was carried out on Commonplace, the Council's new consultation system, funded by a government scheme to promote digital engagement. This resulted in a significant shift in people including town and parish councils choosing to submit comments online, and generated responses from all sectors of the community but notably the Council was able to target the District's younger people which was a shortcoming of previous consultations. In November 2022, the government awarded additional funding of £230,000 (together with West Oxfordshire) to further develop and promote digital engagement tools.

Officers are continuing to update the evidence base and studies to support the partial update of the Council's Local Plan, including:

- **Cotswold District Green Infrastructure (GI) Strategy**. The GI Strategy forms part of the Local Plan evidence base and responds to the Council's climate and ecological emergencies and corporate priorities to improve health and wellbeing. A summary of comments received together with a final edit of the Strategy is now underway and will be presented later this year together with the draft Local Plan Partial Update;
- **Sustainability Appraisal** - this is a statutory and iterative process in the production of the Local Plan; it helps to ensure policies promote sustainable patterns of development;
- **Habitats Regulation Assessment** - like the Sustainability Appraisal this is a statutory and iterative process; it will examine the effect of proposed development on protected habitats.;
- **Strategic Flood Risk Assessments** - a key piece of evidence that helps to ensure proposed development is located away from areas that flood.
- **Strategic Housing and Economic Land Availability Assessment (SHELAA)** - which seeks to identify land that could be suitable for allocation in the updated Local Plan). The latest version was published in October 2021 and local communities have had the opportunity to comment on the document through the Local Plan consultation. An update is due to be published later this year.
- **Carbon impact and evidence base** - a joint project with West Oxfordshire will provide evidence to support zero carbon policies. Officers met prospective consultants in late 2022 to discuss the project brief, establish indicative costs and confirm capacity to deliver this project;

- **Transport assessments in Cirencester** (including Kemble Very Light Railway) – the Council's consultants, ITP, have produced a final draft, findings of which were presented to the funding body (GEGJC) in March 2023. A project brief for Transport and Access Study for Cirencester, which will also examine parking needs, is currently being set up. The project is expected to be fully commissioned in April 2023 for delivery by the end of August;
- **Design Code** – a broad document covering all aspects of design within a Cotswold context including architectural, urban, landscape, ecological and sustainable design. This project is expected to be commissioned in Spring 2023;
- **Housing Strategy** - a draft strategy will be published for public consultation in Autumn 2023. With the aim of adopting the strategy in early 2024.

An internal review of the first drafts of Local Plan policies commenced in October 2022. Looking further ahead, submission to Cabinet and Council of the draft Local Plan for the next stage of consultation is expected at the end of 2023 / early 2024. In August 2023 the council published a review of its local plan housing requirement which concludes that housing needs have not changed significantly and therefore it can continue to demonstrate over five years supply of housing land.

Work continues on the Cirencester Town Centre Masterplan project which was officially rebooted in January 2021. The project is split into two discrete parts, (1) feasibility assessments; and (2) Framework Masterplan.

(1) There are various town centre issues that need exploring to support the production of a masterplan, for example, the changing nature of uses in the high street, parking demand and capacity and the future impact on transport modes of achieving zero carbon. The Council has already completed an assessment of possible changes to uses in the town centre and an updated Cirencester Town Centre Health Check. Both documents are available on the Council's website. Further feasibility assessments were carried out in 2022 including two transport studies which were completed in Autumn 2022. The first of these evaluates potential locations for a transport interchange in the town centre. The second – a component of the Sustainable Transport Strategy (see below) - establishes a possible trajectory to zero carbon transport in Cirencester by 2045, helping to inform the vision of the town's future transport and movement needs, including future parking requirements. Officers will continue to work on these assessments during 2023.

(2) In April 2022, the Council commissioned consultants, Mace, to prepare a Framework Masterplan which will bring the whole project to life and invite local communities to engage and shape the future of their town centre. Councillor workshops were held in July and September 2022 to consider the preferred options for the draft Masterplan. Work continues on drafting the Framework Masterplan along with preparations for stakeholder engagement and communication later this year. The Masterplan project aligns and supports the Council's Local Plan partial update and Cirencester Town Council's emerging Neighbourhood Plan.

In March 2021, the Council appointed its first Sustainable Transport Strategy Lead officer, who is responsible for developing and delivering a new Sustainable Transport Strategy to support the partial update of the Local Plan and the transition to a carbon zero future. The first stage of work on the Sustainable Transport Strategy has been concluded with the latest results presented to informal Cabinet in December 2022, and shared with other

partners and stakeholders. The initial phase established future "do nothing" transport carbon forecasts for Cotswold District and quantified the difference between that forecast and the trajectory we need to meet to achieve our aim of net zero carbon emissions by 2045. The next phase explored options to close that gap, identifying high level targets for vehicle mileage reduction to 2045 and interventions to achieve this shift in both rural and more urban areas. In broad terms, the District needs to achieve:

- an overall per capita reduction in total trip mileage of 25%;
- reduction of around one third of car mode share of remaining mileage;
- tripling of both active travel and public transport mileage; and
- electrification of remaining vehicle trips.

These framework targets were approved by Cabinet in March 2023 and will now be used to direct the next stage of work focusing on identifying the optimum implementation of measures/interventions to deliver these targets. This is likely to include a number of studies such as the District-wide access and movement study, transport attitudes and behaviours study and work-related transport study.

The outcomes from the developing Sustainable Transport Strategy are currently being used to inform the update to the Local Plan update and in the preparation of other planning policies, such as the Cirencester Town Centre Masterplan. They are also aligning with similar studies and schemes being progressed by Gloucestershire County Council – including the new Local Transport Plan, expected next year - to ensure a unified and cooperative approach.

Support health and well-being

The Context

The health and wellbeing of our residents is generally good and above the England and the county average in most measures. Cotswold District is one of the safest districts with very low crime levels and is surrounded by beautiful countryside. However, there are some challenges. Cotswold District has an ageing population; over the last 10 years, it has experienced greater growth across all 65+ age groups compared to England and Wales. Many older residents live alone, and coupled with the rurality of the District, loneliness and access to services are issues for the District.

The wider determinants of health also need to be taken into account - social, economic and environmental factors such as unemployment, low income, poor housing, and lifestyles which have an impact on people's health and wellbeing. This means that the Council needs to work with a wide range of partners, to pool resources and to apply a whole systems and asset-based approach to address challenges together.

Actions we are taking

We want Cotswold District to be the best in the country for health and wellbeing, and promoting healthy lifestyles and providing opportunities for people of all ages to be active is key. A Leisure Strategy determined by local priorities and outcomes was developed with the aim of providing effective and sustainable physical activity and sport opportunities for local communities via investment in our stock of leisure facilities and other non-facility interventions. In March 2021, Cabinet authorised officers to work in partnership with other organisations on the feasibility of the projects in the Strategy. Specialist Leads for each of the three themes (Healthier District, Connected Community and Active Environment) have developed action plans for each area. Progress on the projects are being monitored by the Active Cotswolds Programme Board and are reported to the Portfolio Board.

The leisure management options appraisal including the Corinium Museum has been completed to determine the most suitable delivery model, contract scope and contract terms for the Council's leisure facilities when the current contract expires on 31 July 2023. The procurement process to appoint a new external Leisure and Culture Management Contractor is now complete and work has commenced on the mobilisation of the new contract with Freedom Leisure for the new Contract to commence 1 August 2023.

Another project in the Leisure Strategy is the development of a Playing Pitch Strategy which will include an assessment of the District's current and future needs for playing pitches for football, rugby, hockey, tennis and polo. Consultants, KKP are undertaking the project, and have now completed both the winter sport assessment and the summer sport assessment. Both assessments were informed by consultation (1-2-1, telephone and online) with town and parish councils, educational establishments and sports clubs, and have been reviewed by sporting governing bodies with KKP and council officers. The National Governing Bodies have reviewed both assessment reports and signed them off. KKP is pulling together the final action plan which will accompany the report for sign off by Sport England. The report will be the evidence base for current, unmet and future demand for playing pitches and will be used to support developer contribution requests and external funding

bids. Once signed off, a report will be prepared for Cabinet. All National Governing Bodies of the relevant sports have signed off the report, just awaiting feedback from Sport England, A steering group is due to meet at the end of March 2023. Final report was received June 2023 and is anticipated to go to Cabinet in September 2023.

The Council was awarded £162,500 by the Government to assist with installing Changing Places toilets in locations across the District. The toilets are larger and accessible to people who cannot use standard accessible toilets, with equipment such as hoists, curtains, adult-sized changing benches, and space for carers. The venues in our bid were Cirencester Abbey Grounds, Birdland at Bourton-on-the-Water, the Cotswold Country Park and Beach at South Cerney and Cotswold Farm Park at Guiting Power. Cotswold Farm Park has been completed, the three other venues will not now be completed until the 2023/24 financial year..

The Spring funding round closed to applications on 26 April. There were relatively few projects which came forward this round, perhaps due to lower public awareness because of the Pre-Election Period, but we are aware of a number of projects being developed that are waiting on permissions such as planning, before they are able to come forward. At the time of writing, there are two projects campaigning for support on Crowdfund Cotswold. At the end of quarter 1, work started on promoting the Autumn Round, with a deadline of 13 September – much of this activity focuses on a project creator workshop due on 17 July.

The council has brought together a small working group to look at improved food equality, a 'good food economy' and the development of a possible Cotswold Food Network to jointly work towards these two outcomes. As part of that work we have supported Feeding Gloucestershire with their Cotswold District launch in June. The event has explored the Food Network and is summarised in this video. The working group will regroup to take all the feedback into account and to look at next steps. Cotswold District Council has committed £40k towards the proposed Food Network. This funding is part of the Cotswold Connected Community and Food Programme the Council launched in December 2022 (https://www.cotswold.gov.uk/ConnectedCommunityProgramme/)

The Active Cotswold programme has seen a lot of activity during the last months to improve physical activity levels and opportunities locally. After the 'Fit Kit' launch in February, 5 kits have been installed across the district:

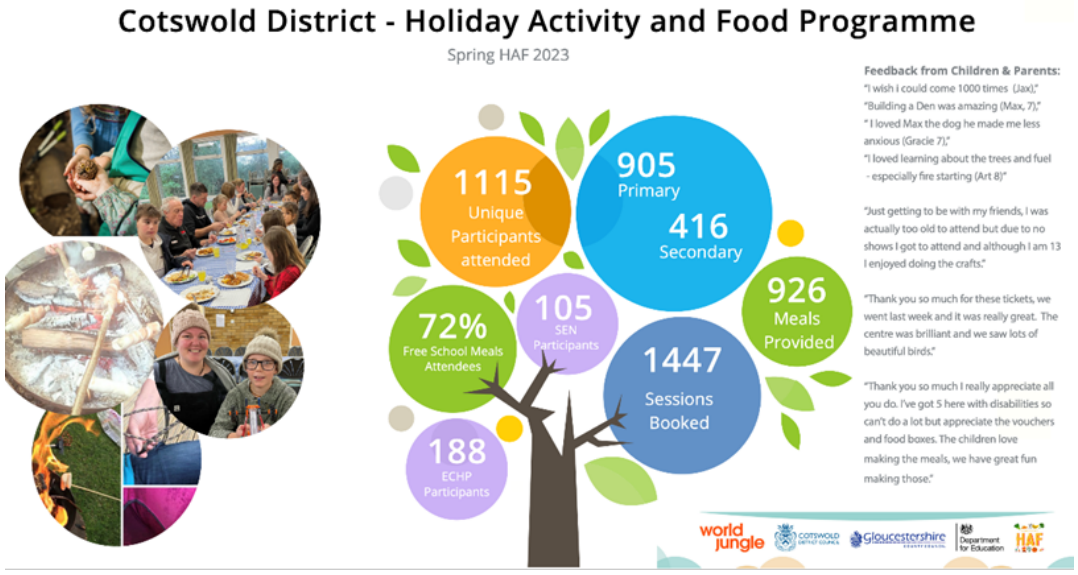
- Bromford Housing at Chesterton, Cirencester
- Tetbury Friendship Café
- Dementia Café Stow (also used by the Stow Wellness Café)
- Bromford Housing at Bourton on the Water (also used by Cotswold Friends Wellness Café)
- Bromford Housing Morton in Marsh (Cotswold Friends Wellness Café and The Churn job club are also going to use this kit).

We have set up an informal Wellbeing Walk in Chesterton with the Bromford Housing group, where we arranged the route and took the group (6 people) for the first walk and they plan to continue this on their own. We are joining the 'Ramblers Wellbeing Walk Scheme' (https://www.ramblers.org.uk/go-walking/ramblers-wellbeing-walks.aspx) in partnership with West Oxfordshire District Council. Our officer Kate will train volunteers to become walk leaders across the district with the first training date to take place in the summer at Sherbourne Estate. We have also created a workout card and demonstrated a resistance band workout at a number of existing groups across the districts like the Barton Senior Citizen Group, Working 4 Wellbeing Lechlade,

Parkinsons UK in Cirencester, Dementia café in Stow and Friendship Café in Tetbury. YOU CAN MOVE- is a new outdoor movement class to support people to become more active, which will start in September in Fairford.

The Council, on behalf of the Cotswold Community Safety Partnership (CSP) has secured £50k from the Home Office's Safer Streets Fund administered by the Office of the Police and Crime Commissioner, which includes interventions aimed at tackling neighbourhood crime, anti-social behaviour and Violence Against Women and Girls (VAWG), improving the safety of public spaces for all. After the public consultation in March where we encouraged communities to help us identify areas in the district that feel unpleasant, unsafe and may attract anti-social behaviour, we have shortlisted possible projects. These could be alleyways, under paths, parks and others. Over the summer months, the shortlisted areas will be visited and the local community will be engaged to develop a plan for the improvements. We aim to complete this process by October 2024 and for works to commence in November. The CSP is also in the process of bidding for further funding from the Safer Streets Round 5.

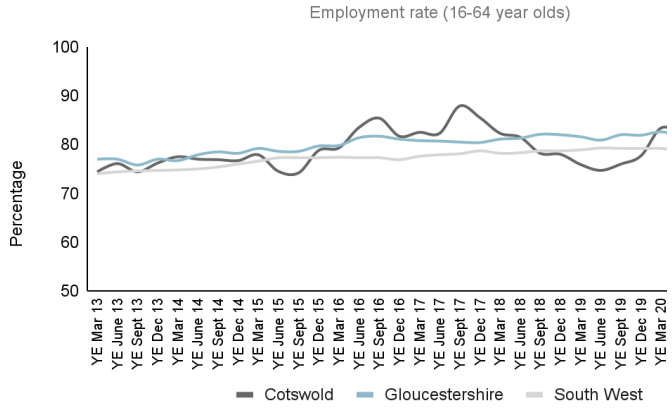
In partnership with World Jungle, we have delivered another successful Holiday Activity and Food programme (HAF). The infographic below shows the impact the programme has had. We are making great progress to increase our engagement with schools, in partnership with Bloodhound Education who are our Community Connectors for the programme. We have also reached out to more partner organisations that are supporting families, to promote the HAF project to their clients.



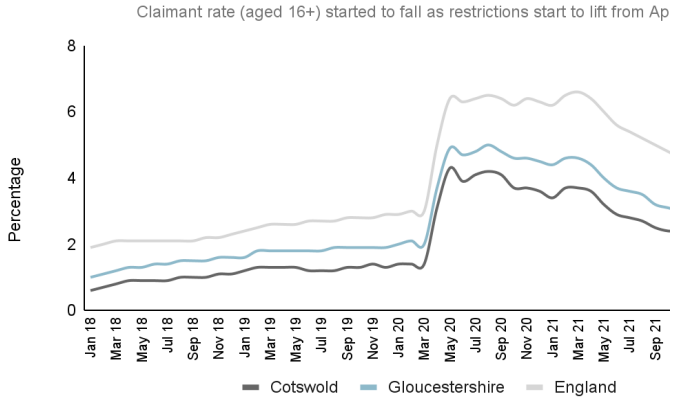
Enable a vibrant economy

The Context

The District supports an economically active population of around 47,700 and has strengths in finance and business services, ICT including science and technol and food services. Around 90% of businesses are small enterprises employing fewer than 10 people. Median wages for people working in the District are below affordability of housing is a significant issue for the District, which can result in skill and labour shortages. Historically, unemployment has been relatively low bu but has fallen back significantly to 1.6% - the lowest in the county, but still slightly above the pre-pandemic level. The national and global economies have faced the Russian invasion of Ukraine and sharply rising prices, particularly for energy and fuel, which is impacting on disposable income and living standards. Althoug dropped back, they are still significantly higher than prior to the invasion and food inflation continues to run at very high levels.



Source: ONS, Annual Population Survey



Source: ONS, Crown Copyright Reserved (Nomis)

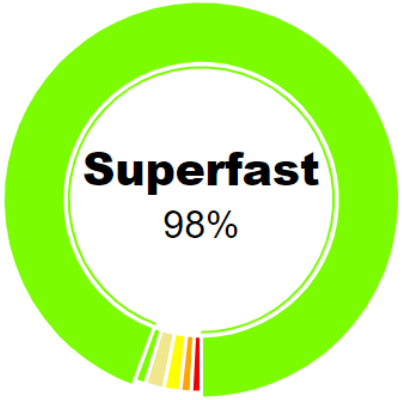
Businesses within the visitor economy, particularly within hospitality, continue to face a particularly challenging scenario: huge increases in wage costs – not only to recruit and retain staff amid continuing labour shortages, but also with the increase in the minimum wage; significant, continuing increases in costs,

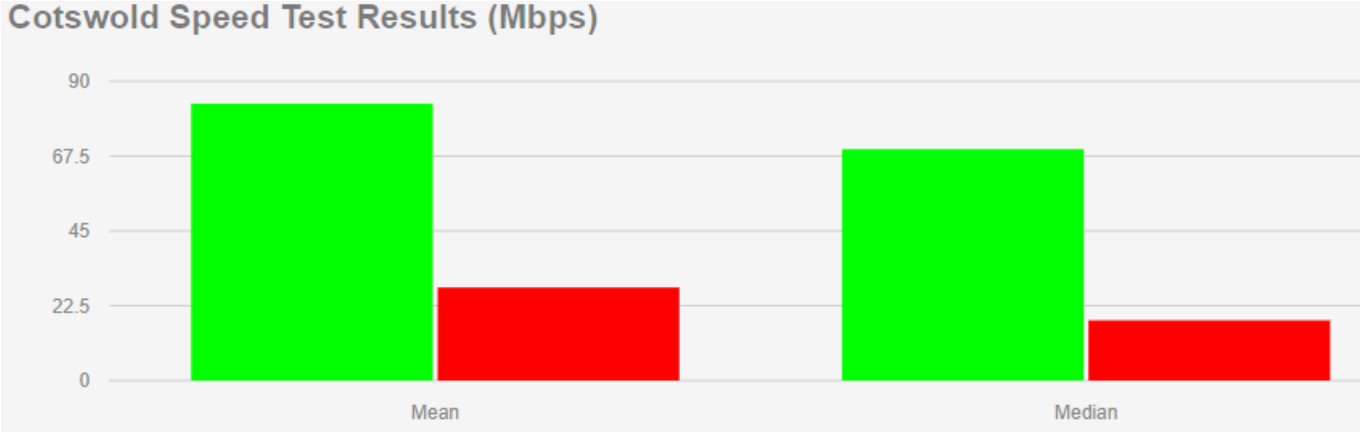
particularly for food and drink purchases; and all against the backdrop of a major squeeze on customer spending. The rising cost of living has impacted consumer behaviour and spending with shorter staying trips, less day trips and an increased interest in cheaper or free options for things to do.

Despite the reappearance of many high spending overseas visitors, particularly from the United States, overseas visitor numbers are still expected to be 8% down on pre-pandemic levels this year. The Asian markets, particularly China, are proving slow to recover.

The number of job postings remains high, reflecting difficulties in recruitment. There are many companies at the cutting edge of innovation and the opportunity to grow key sectors like agritech, cyber and digital, medical equipment and environmental technologies.

The lack of a reliable broadband connection especially in rural districts can add to social isolation as well as reduce opportunities to be economically active. Openreach has been working in Cirencester and has announced plans to deliver full fibre to Tetbury, South Cerney, Lechlade, Northleach, Fairford and Bourton-on-the-Water by 2026 at the latest. A detailed timetable is awaited, but work in Bourton-on-the-Water is due to start in 2023. Gigaclear are on site at Moreton-in-Marsh and were due to connect 700 premises by the end of 2022 and 1700 by September 2023. Fairford, Tetbury, Bourton-on-the-Water, South Cerney and Stow-on-the-Wold are due to be delivered in 2023. However, there are still some areas where broadband is poor and even superfast connectivity is not sufficient for some businesses to operate in the way they wish to. The Council is working with the Fastershire Project to address these areas. The County Council has recently taken a decision to increase the level of the Fastershire Community Broadband Grant to make it more attractive to the infrastructure providers and is also introducing the Gloucestershire Digital Household Scheme to use 4G technology to deliver connectivity in remote locations where fibre is not practical or is prohibitively expensive. A Fastershire Business Grant of up to £20,000 is also being introduced. The coverage of superfast (>30mbps) has increased slightly and ultrafast (>100mbps)/full fibre has moved up quite quickly according to figures on the ThinkBroadband website.





Much of our work to enable a vibrant economy will be achieved in partnership with key stakeholders ranging from the County Council, GFirst LEP, Chambers of Commerce and other business groups, town and parish councils, institutions like the Royal Agricultural University and Cirencester College and individual businesses.

Actions we are taking

The Green Economic Growth Strategy 2021-25 sets out the challenges and issues for the District, and how they will be addressed. It identifies the key areas that will deliver growth in the District, as well as a recovery plan for the local economy. The Cotswold Economic Advisory Group which was set up to advise, oversee and challenge the implementation of the Strategy; and provide a link to the main institutions and the wider business community in the District continues to meet regularly and provide valuable advice and assistance. The group has representation from key stakeholders including Cirencester College, the Royal Agricultural University (RAU), Cotswold Airport, Fairford and Lechlade Business Group, the Federation of Small Businesses and GFirst LEP. Most recently, the Group received a presentation from Peter Carr of Gloucestershire County Council on employment and skills and Adam Vines of the Cirencester Chamber of Commerce on the Together Gloucestershire ethical procurement initiative.

In 2022, the Council was awarded £1 million over three years from the UK Shared Prosperity Fund for the period 2022-23 to 2024-25. The Council's Local Investment Plan, which sets out how the Council proposes to use the money, was approved by the government in early December 2022. The fund has three themes – Community and Place, Supporting Local Business and, in year three, People and Skills. Year one projects have largely been completed, including 'Clean and Green' initiatives and a feasibility study for the Old Station building in Cirencester. Cabinet in March agreed to allocate up to £135,000 to the Growth Hub in Cirencester to provide business support. One positive benefit of this funding is that the Growth Hub will be able to expand its outreach programme across the District, particularly in the north in areas like Moreton-in-Marsh and Chipping Campden. Decisions will be taken on the remaining 2023-24 projects to be funded shortly and an open call will be run for 2024-25 projects, which represents the majority of the funding.

A further £764,292 was allocated to the Council from the Rural England Prosperity Fund for financial years 2023-24 and 2024-25. This is a capital-only fund to support rural businesses to diversify with new products and services and to provide new community infrastructure. An addendum to the Local Investment Plan was submitted to the government at the end of November 2022 and it was approved in early April. The proposed approach has been to allocate funding for business grants, for active travel and for community projects, including assisting village halls with sustainability-related improvements. A report is going to Cabinet in July setting out the proposed approach and the application process will be opened as soon as possible after that.

Town centres are important from both an economic and civic pride perspective. The number of vacant town centre retail units is a measure of a town centre's health and how the Council is meeting its objective of helping town centres to recover from the Covid-19 pandemic. A survey undertaken in August 2021 showed Cirencester had a town centre vacancy rate of 11%, three percentage points below the national average. The vacancy rate improved further in April 2022 to just under 6% and in October 2022 to just under 5%. The latest count at the end of March 2023 showed the vacancy rate edging up to just above 5%, with a number of the remaining units either under offer or undergoing refurbishment. The smaller towns within the District generally have lower vacancy rates and none of these are of concern at this time, although we need to be mindful of the pace of change on the high street and the potential impact of the cost of living crisis. In some of the smaller towns, a loss of retail space to residential is of more concern as it can affect the town's 'critical mass' and therefore its ability to attract visitors

Cotswolds Tourism have been successful in attaining Visit England accreditation for a new Local Visitor Economy Partnership (LVEP), Cotswolds Plus. Led by Cotswolds Tourism the LVEP sees all the local destination organisations (Marketing Cheltenham, Visit Gloucester, Visit Gloucestershire, Visit DeanWye) and the Cotswolds National Landscape working together to support and improve the local visitor economy.

Cotswolds Plus will not be consumer facing but will work 'behind the scenes' to shape and deliver national strategy and activities, as well as to bring a coordinated, strategic approach on key issues such as sustainability, business support and research. LVEP status ensures increased support, training, and collaboration with Visit England and Visit Britain in core areas such as accessibility, business support and engagement with travel trade operators and event planners. Any future Visit England funding streams will also be channelled through the LVEPs.

One of Cotswolds Tourism's ongoing priorities is supporting visitor economy businesses to improve their online presence in general but in particular to encourage them to become more widely bookable online. We have run several workshops focussed on the new Visit England campaign with the National Lottery and Visit Britain shop which requires businesses to use the Tourism Exchange Great Britain (TXGB) system. These efforts were recognised at the Visit England Awards for Excellence where Cotswolds Tourism received an award for its efforts in driving online bookings through the TXGB platform.

We have submitted a small bid to the GWR community fund focussed on promoting sustainable travel around Moreton in Marsh. We will know by the end of August if this bid has been successful and, if so, will work closely with the town council and local businesses.

The tourism team continue to work with the Council, Bourton Parish and Bourton Business Network to seek solutions for Bourton coach parking, as well as keeping tour operators informed of developments.

There continues to be a steady flow of travel trade, press, media and filming requests with one recent media visit to Cirencester & the Cotswold Water Park focussed on accessibility.

The Council is working with partners to bring sites forward which will support the Council's ambition to grow high value, highly skilled, low environmental impact businesses in key areas including agritech, digital/cyber, medical equipment and environmental technologies, and to enhance the opportunities available for local people, particularly young people so that they have the skills they need to secure employment in the District. The Council is working with:

- The Royal Agricultural University to bring forward their Triangle/University Gate site. The Council's Chief Executive, the Cabinet Member for Economy, the Business Manager for Localities and the Economic Development Lead have held a number of meetings with the new Vice Chancellor, Chief Operating Officer and Director of External Relations at the RAU. The RAU has come up with a concept of an 'Innovation Village' which will help to address global challenges around sustainable farming and food security. The plans include teaching and research space, incubator and grow-on business units, a conference centre, hotel and hospitality space. The Council assisted the RAU to secure £100,000 from the Gloucestershire Economic Growth Joint Committee Strategic Economic Development Fund to assist with the cost of project management over the next two years. The project management resource has now been put in place. It is anticipated that a planning application for the site will be submitted at some point before the end of 2023. A public launch of the project took place on 20 January 2023 and attracted considerable media attention.

- the new owners of the former Mitsubishi site in Cirencester, now renamed Watermoor Point. The office element is now over 90% let. The owners have also introduced an innovative and flexible co-warehousing solution, offering businesses a private, secure space within the warehouse, ranging from 1,000 to 10,000 square feet. Businesses also benefit from shared mechanical handling equipment and an on-site qualified forklift driver. Watermoor Point has been granted planning permission to install an additional 310 PV solar panels in addition to its existing 50kWh array, demonstrating its commitment to sustainability.
- ZeroAvia which has relocated from Cranfield to Cotswold Airport. ZeroAvia is a leading innovator in decarbonising aviation, and is developing a hydrogen-electric powered aircraft. The Council is working with the Inward Investment Team at GFirst LEP to support ZeroAvia which has increased its staff numbers from 15 to 150 onsite, with the plans to continue to grow significantly. The Council and GFirst will continue to support ZeroAvia in its continued growth. Other sustainable aviation businesses, such as Vertical Aerospace and S&C Thermofluids, are already based at Cotswold Airport and we are working with the airport's owners and others to promote it as a hub for such innovative businesses.
- Bathurst Developments in relation to the first phase of employment land at The Steadings development. They have appointed a developer partner. A reserved matters planning application has been submitted for this phase and is awaiting resubmission to reflect the comments made by the Council's planning officers.

The Applied Digital Skills Centre at Cirencester College was officially launched at an event held in May 2022. The new centre will give the District a great opportunity both to develop a workforce with the digital skills needed in the 21st century, and also to grow its digital and cyber sectors. The Council continues to work closely with the College, particularly to identify partnerships with business which would be mutually beneficial. The College was also awarded £4m of funding from the Government for a new T-level building which will help to provide high level skills in the District. T Levels are based on the same standards as apprenticeships, designed by employers and approved by the Institute for Apprenticeships and Technical Education. It is equivalent to 3 A-levels and involves an industry placement. The Economic Development Lead has met with staff from the College to assist them with identifying potential placements for students. The College has most recently been awarded £3.5 million, in June, to create a Student Wellbeing Hub.

On infrastructure, the Development Consent Order (effectively the planning application) for the A417 Missing Link was submitted to the Planning Inspectorate by Highways England in June 2021. The examination finished in May 2022 and the scheme was approved by the Secretary of State in November 2022. Kier Highways has been appointed main contractor. The project, which at around £460m, is the biggest infrastructure investment in the District and indeed the whole county for a generation, is designed to reduce congestion and improve road safety on this important link between Cirencester and Gloucester and, more widely, the M4 and M5 motorways. While new road building projects can be seen as environmentally damaging, much effort has been focused on delivering opportunities for environmental improvements as well as economic benefits. There will be opportunities for local suppliers, contractors and skills. Kier have started on site with various preparatory works and are presenting to the next meeting of the Cotswold Economic Advisory Group in September.

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COTSWOLD
DISTRICT COUNCIL

Delivering great services locally

PERFORMANCE REPORT:

April 2023 - June 2023

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A note on performance benchmarking

Benchmarking can be a useful tool for driving improvement; by comparing our performance with other similar organisations, we can start a discussion about what good performance might look like, and why there might be variations, as well as learning from other organisations about how they operate (process benchmarking).

When we embark on performance benchmarking, it is important to understand that we are often looking at one aspect of performance i.e. the level of performance achieved. It does not take into account how services are resourced or compare in terms of quality or level of service delivered, for example, how satisfied are residents and customers? Furthermore, each council is unique with its own vision, aim and priorities, and services operate within this context.

Benchmarking has been included wherever possible and additional investigations are underway to provide it for those metrics that are missing comparisons.

Overall Performance

COTSWOLD DISTRICT COUNCIL

The Council's performance has been mixed, with commendable progress in Tax Collection Rates and Planning Determination Times. However, the cost of living crisis continues to result in increased customer contact for certain services. The challenging economic situation has put additional strain on residents, leading to an upsurge in queries and concerns.

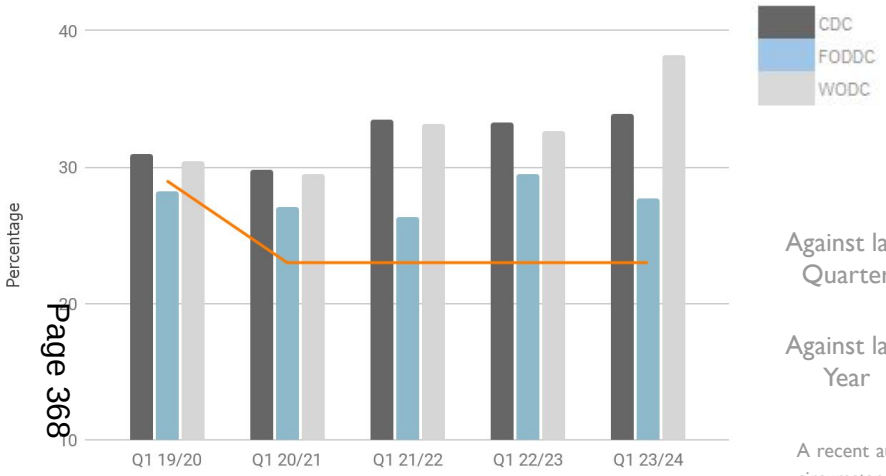
There are some indicators that are exhibiting a negative trend including the Percentage of Planning Appeals Allowed and Missed Bins per 100,000.

The Council remains committed to further improving its performance and service delivery and actively investing in the development and implementation of automation and self-serve options for customers. By providing accessible and efficient self-help tools, customers can address their queries and concerns independently, leading to a decrease in the need for repeated interactions with services. It will continue to monitor and assess the impact of improvement programs in reducing customer contact and enhancing operational efficiency.

Note: Currently, the Waste Data Flow Data remains unavailable, leading to the absence of updated recycling rates and tonnage indicators. As soon as the relevant figures become available, the recycling rates and tonnage indicators will be updated.

Percentage of Council Tax Collected

INDEX



Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	↑	↑
Against last Year	↑	↓	↑

Target for Q1

23%

Target for 2023/24

99%

A recent audit of the Council Tax Services indicated that a significant sum of arrears had accumulated during challenging circumstances associated with the pandemic. The recovery of these arrears had been suspended to support customers in difficult financial circumstances and to facilitate the adoption of a new Council Tax platform enabling self service payments. The recovery process has now been reinstated and the current cycle is up to date, resulting in significant improvements in the collection of those arrears through manageable payment schedules for those residents affected.

The service reports progress in collecting previous year's debt. The below table shows the percentage of aged debt that has been collected and the total outstanding:

	2020-2021	2021-2022	2022-2023	Total Outstanding
CDC	10.28%	12.29%	11.78%	£3,543,590

By the end of March 2023, authorities in England had collected £35.7 billion of council tax that related to 2022-23 (plus an additional £800 million of aged debt) and achieved an average in-year collection rate of 96.0%, an increase of 0.2 percentage points over 2021-22.

The collection rate for Q1 is well above target and the highest it has been since prior to 2019/2020.. As the target has been consistently hit in Q1, reinstating the previous target of 29% and investigating adjusting the targets for Q2 and Q3 respectively should be considered.

How do we compare?

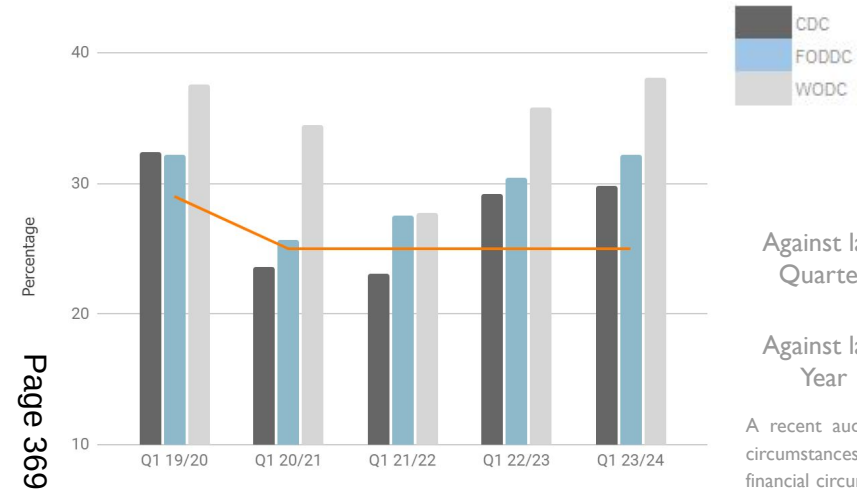
Council tax collected by 31 March 2023 as a % of amount collectable - SPARSE
There are 181 district councils in England. All 3 councils are predominantly rural

2022-23 Benchmark	%	District Rank	County Rank	Predominantly Rural Rank	Quartile
Cotswold	97.97	52/181	3/6	32/72	Second
Forest	97.76	70/181	4/6	40/72	Second
West	97.12	94/181	4/5	49/72	Third

Percentage of Non-domestic rates collected

COTSWOLD DISTRICT COUNCIL

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Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	↑	↑
Against last Year	↑	↑	↑

Target for Q1

25%

Target for 2023/24

99%

A recent audit of the Council Tax Services indicated that a significant sum of arrears had accumulated during challenging circumstances associated with the pandemic. The recovery of these arrears had been suspended to support customers in difficult financial circumstances and to facilitate the adoption of a new Council Tax platform enabling self service payments. The recovery process has now been reinstated and the current cycle is up to date, resulting in significant improvements in the collection of those arrears through manageable payment schedules for those residents affected.

The service reports progress in collecting previous year's debt. The below table shows the percentage of aged debt that has been collected and the total outstanding:

	2020-2021	2021-2022	2022-2023	Total Outstanding
CDC	13.40%	13.32%	12.07%	£438,045

The arrears outstanding for previous year's debts for Business Rates include some data where the amount outstanding now is more than that brought forward at the beginning of the financial year. There are some processes which can increase the amount that needs to be collected, such as Rateable Value changes and amendments to liability. As Business Rates deals with large amounts of money, the outcome can outweigh the amount that has been collected.

The collection rate Q1 is just shy of being back to pre-pandemic standards by 2.5%. The recommendation is to reconsider the targets in line with Council Tax.

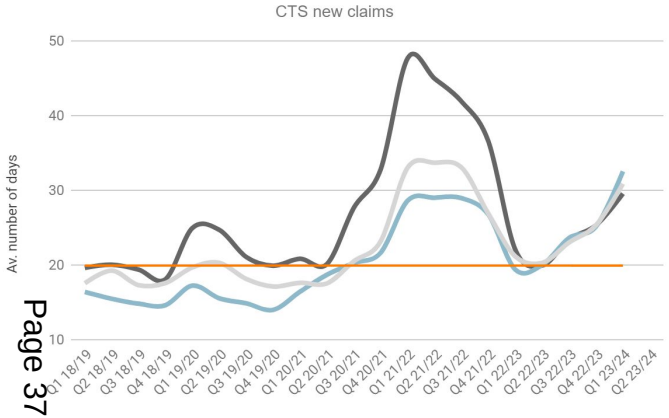
How do we compare?

Non Domestic Rates collected by 31 March 2023 as a % of amount collectable - SPARSE
There are 181 district councils in England. All 3 councils are predominantly rural

2022-23 Benchmark	%	District Rank	County Rank	Predominantly Rural Rank	Quartile
Cotswold	94.07	177/181	6/6	71/72	Bottom
Forest	95.97	161/181	5/6	67/72	Bottom
West	98.39	53/181	2/5	20/72	Second

Processing times for Council Tax Support new claims

INDEX





Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	↑	↑
Against last Year	↑	↑	↑

Target for Q1

CDC	FODDC	WODC
20	20	20

How do we compare?

Gov.uk produces tables to show a snapshot of the number of CTS claimants at the end of each financial year. The below table shows number of claimants at the end of March 2023 and the percentage change from Q4 2022 for each authority, plus the data for all authorities in England

	Number of Claimants at end of March 203	Percentage Change since March 2022
Cotswold	1,926	-0.7%
Forest	2,240	-4.1%
West	1,745	-2.0%
England	1,393,323	-1.9%

Q1 started with a backlog of work for new claims and change of circumstances cases. The team have worked hard to get this backlog more under control. However, a large number of applications from residents as a result of the Cost-of-Living Crisis continues to be received. Initial changes to procedures to place more reliance on the customer to provide supporting documentation, have not been as successful as anticipated.

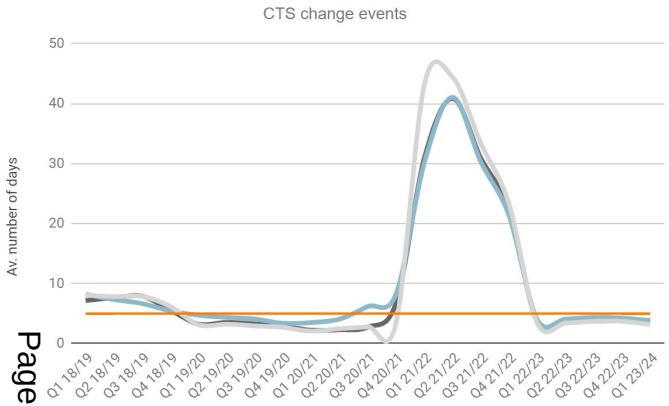
In order to improve performance, investigations were made into the automation capability. On speaking with other councils, who were able to achieve 70% of processing automation as opposed to the 40-45% that the service was achieving, it became apparent that the same capability was possible but processes had to change in order to maximise on the capabilities of the system.

This way of working will continue to be tested and monitored but week-by-week, the processing stats are reducing. By being up-to-date, the service will be able to stay on top of the processing stats and keep reducing them.

Processing times for Council Tax Support Change Events remains well within the target of 5 days. Although there has been a small increase from this time last year, the change is only marginal (0.29)

Processing times for Council Tax Support Change Events

INDEX





Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	⇨	⇩	⇩
Against last Year	⇧	⇩	⇩

Target for Q1

CDC	FODDC	WODC
5	5	5

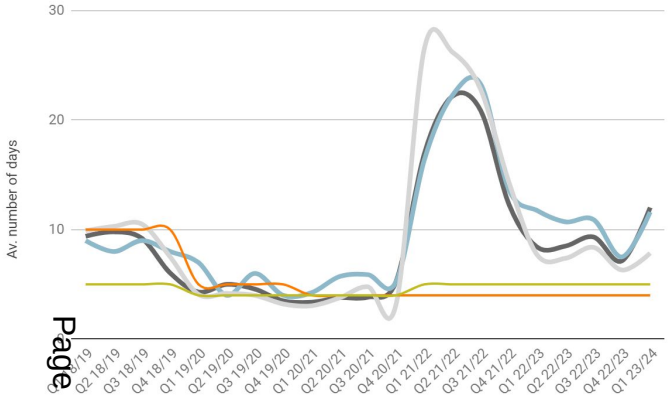
Processing times for Council Tax Support Change Events remains well within the target of 5 days. Although there has been a small increase from this time last year, the change is only marginal (0.29)

How do we compare?

Benchmarking currently not available. The Data & Performance Team will investigate options.

Processing times for Housing Benefit Change of Circumstances

INDEX



CDC
FODDC
WODC

Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	↑	↑
Against last Year	↑	↓	→

Target for Q1

CDC	FODDC	WODC
4	4	4

How do we compare?

SPARSE provide benchmarking data on the speed of processing for HB CoCs. The latest data set is from Q3 2022-23

Q3 2022-23 Benchmark	Days	District Rank	County Rank	Predominantly Rural Rank	Quartile
Cotswold	11.00	157/179	4/5	62/72	Bottom
Forest	11.00	159/179	5/5	63/72	Bottom
West	11.00	162/179	4/4	64/72	Bottom

Please see Processing times for Council Tax Support new claims.
The observation for HB CoCs should be read in conjunction with the observation for HB CTS new claims and changes indicators as the work is performed by the same team.

Q1 commenced with a backlog of work for changes in circumstances.
It should be noted that the number of expected changes that would affect Housing Benefit are reducing significantly as can be seen by the number of HB changes assessed compared to the number of CTS changes assessed.

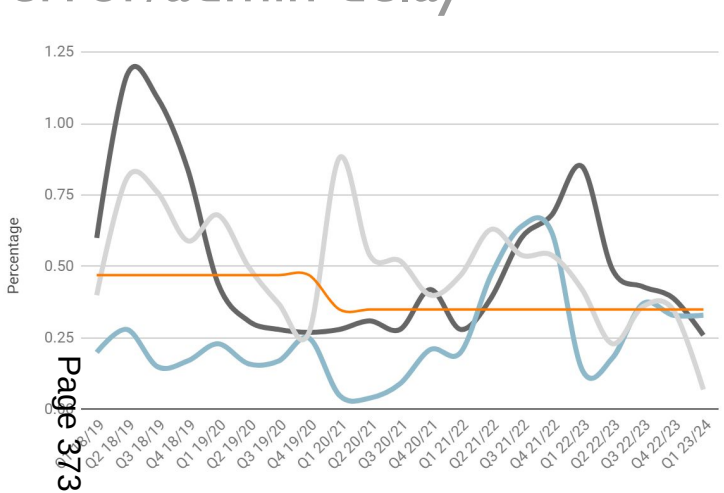
HB Changes - 946
CTS Changes - 4305

Managed migration of Housing Benefit to Universal Credit is being rolled out from April 2024 across the country. As a result, any delay in assessing a HB change can significantly affect the average processing days so we may potentially see an increase in future quarters before reducing again in Q4 when we receive a significant amount of changes that affect Housing Benefit

Percentage of Housing Benefit overpayment due to LA error/admin delay

COTSWOLD DISTRICT COUNCIL

INDEX



Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↓	→	↓
Against last Year	↓	↑	↓

Target for Q1

CDC	FODDC	WODC
0.35	0.35	0.35

Percentage of Housing Benefit overpayment error is 0.26% for Q1, well within the target.
Measures are in place to ensure that HB overpayments due to local authority error are reduced as far as possible. Around 20% of the HB caseload is checked by Quality Assurance officers who target areas which have high error rates such as calculation of earnings. In addition to this work, the service is signed up to the Department for Work and Pensions (DWP) Housing Benefit Award Accuracy (HBAA) initiative to tackle fraud and error.

Note: the national target is 0.47%. In 2020-21, the service set a more stringent target of 0.35%

How do we compare?

TBC

Customer Satisfaction - Telephone

INDEX



Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↓	↓	↓
Against last Year	↓	↑	↓

Target for Q1

90 %

Target for 2023/24

90 %

How do we compare?

The Govmetric Channel Satisfaction Index is a monthly publication of the top performing councils across the core customer access channels. At least 100 customers need to be transferred to the survey to be included in the league table so even if satisfaction is high, it may not be included i.e. May and June for Forest in the below table. This is a national comparator

	Apr Rank	Apr Net Sat.	May Rank	May Net Sat.	Jun Rank	Jun Net Sat.
Cotswold	3	97%	3	98%	1	97%
Forest	2	98%	N/A	N/A	N/A	N/A
West	4	97%	1	100%	3	96%

Table topping levels of performance on Gov Metric for customer satisfaction!

Although this is a very small proportion of our calls, numbers are comparable to other District Councils, hence the 'league tables' being a useful comparator.

Customer Satisfaction - Email





Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↓	→	↓
Against last Year	↑	↓	↑

Target for Q1

No Target

447 residents responded to the survey of which 289 were satisfied. This equates to a rate of 64.65% satisfaction for the quarter.
All outbound emails sent by customer services from Salesforce contain a link to the survey.
A piece of work was undertaken to review the responses from the email surveys due to the more negative responses. Upon review it appears to be dissatisfaction surrounding service failure; missed bins, container deliveries, responses from Planning or Housing etc. System and process improvements by the individual services are being implemented which may affect these figures in the future.

How do we compare?

Benchmarking currently not available. The Data & Performance Team will investigate options.

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Customer Satisfaction - Face to Face

INDEX





Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↓	↓	↓
Against last Year	↓	N/A	↑

Target for Q1

90 %

Target for 2023/24

90 %

Customer Satisfaction from face to face interactions continues to be high with a 97% satisfaction rate for the quarter. 31 out of 32 surveyed were satisfied with the service.

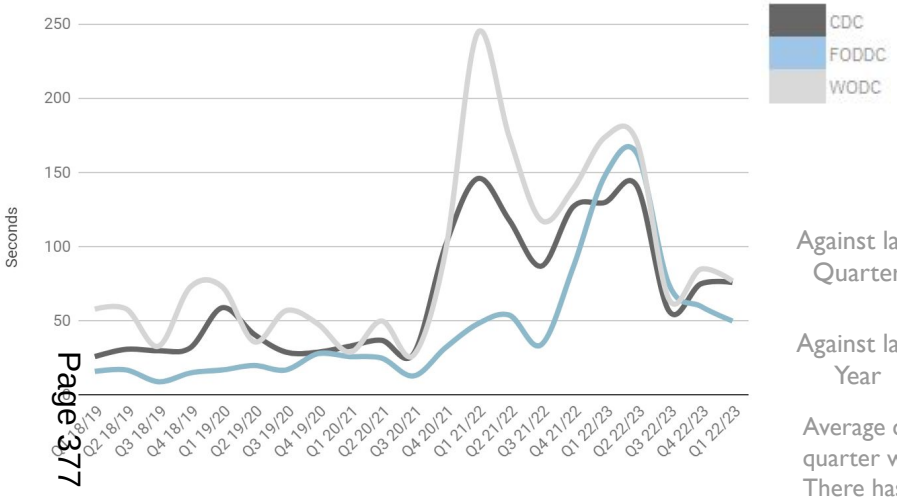
How do we compare?

Benchmarking currently not available. The Data & Performance Team will investigate options.

Note that any gaps in the data indicate no surveys were returned. This is especially apparent when the offices were closed during the pandemic.

Customer Call Handling - Average Waiting Time

INDEX



Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	⇨	⇩	⇩
Against last Year	⇩	⇩	⇩

Target for Q1

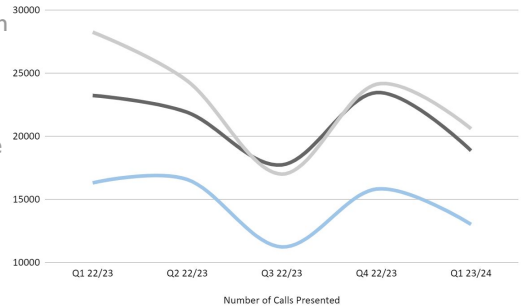
CDC	FODDC	WODC
NO TARGET		

How do we compare?

SPARSE are investigating pulling together Customer Services benchmarking data and if there is sufficient demand and suitably similar metrics to provide comparison across similarly rural local authorities we will work with them to assess any crossover in metrics and potential presentation.

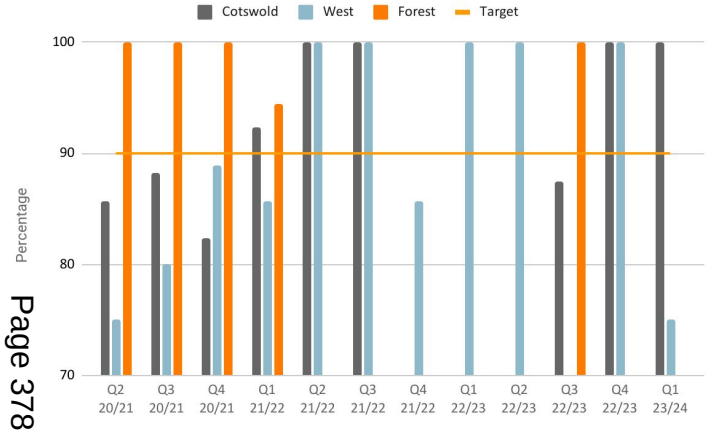
Average call waiting time for the Council remained largely unchanged in comparison to last quarter with a small increase from 75 to 76 seconds.
There has been a marked improvement from Q1 2022-23 with reductions in average from just under a minute.

Call numbers are going down as can be seen from the chart to the right. This trend is expected to continue with further work surrounding Channel Choice encouraging customers to self-serve where possible. The service are proactively working with other services to reduce processing times and repeat contact by using direct links to back office systems resulting in improved customer experience



Building Control Satisfaction

INDEX



Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	⇨	N/A	⇩
Against last Year	N/A	N/A	⇩

Target for Q1

90 %

Target for 2023/24

90 %

Each month, the service conducts telephone interviews with customers who have received a completion certificate during the month. The customer rates the service on helpfulness of staff, quality of technical advice and other information, responsiveness, value for money, and overall satisfaction.

The data still suffers from low numbers of satisfaction survey returns but 11 surveys were completed in Q1, all of which were satisfied..

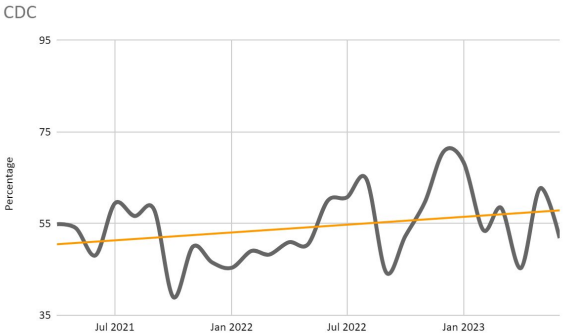
The service is in discussions with Customer Services to see if advisors have availability to conduct surveys on their behalf.

Building Control had 121 applications in Q1 and retains a strong hold in the share of the market. The below chart show market share over time

How do we compare?

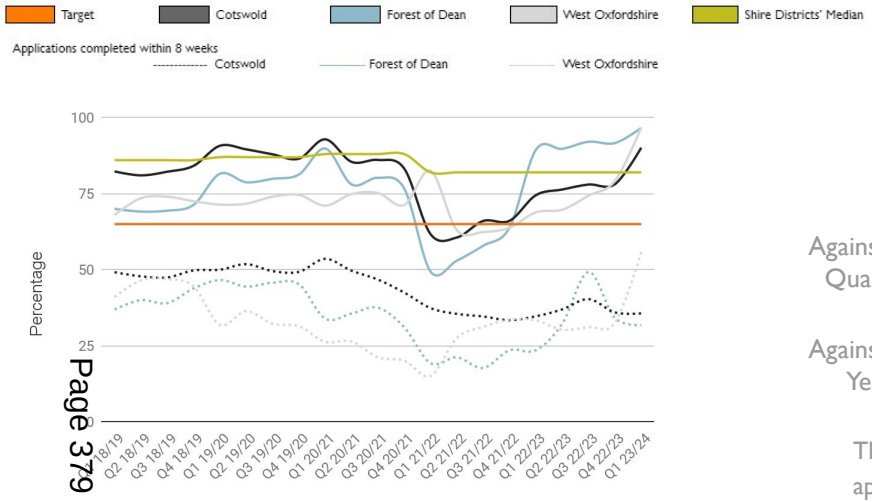
Percentage of share in the market

	April	May	June	Number of Apps for Quarter
Cotswold	45%	63%	52%	121
Forest	63%	50%	69%	93
West	65%	70%	81%	145



Percentage of minor planning applications determined within agreed timescales (including AEOT)

INDEX



Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	↑	↑
Against last Year	↑	↑	↑

Target

CDC	FODDC	WODC
65	65	65

How do we compare?

Minor Developments - % within 8 weeks or agreed time

PLEASE NOTE SPARSE PROVIDE BENCHMARK DATA FOR CALENDAR YEARS AND THE CHART ABOVE AND STATS IN THE NARRATIVE ARE ROLLING

2022 Benchmark	%	District Rank	County Rank	Predominantly Rural Rank	Quartile
Cotswold	76.18	131/181	5/6	52/72	Third
Forest	89.32 %	53/181	1/6	19/72	Second
West	74.43 %	143/181	4/5	59/72	Bottom

The service has performed very well processing Minor applications within times. 101 minor applications were determined in Q1, compared to 88 applications in the same period of the previous year.

Performance for Development Management continues to improve across the application types.

The key findings not requiring Member authorisation from the PAS report that went to each cabinet this quarter have been implemented which has seen an upturn in performance across the partnership.

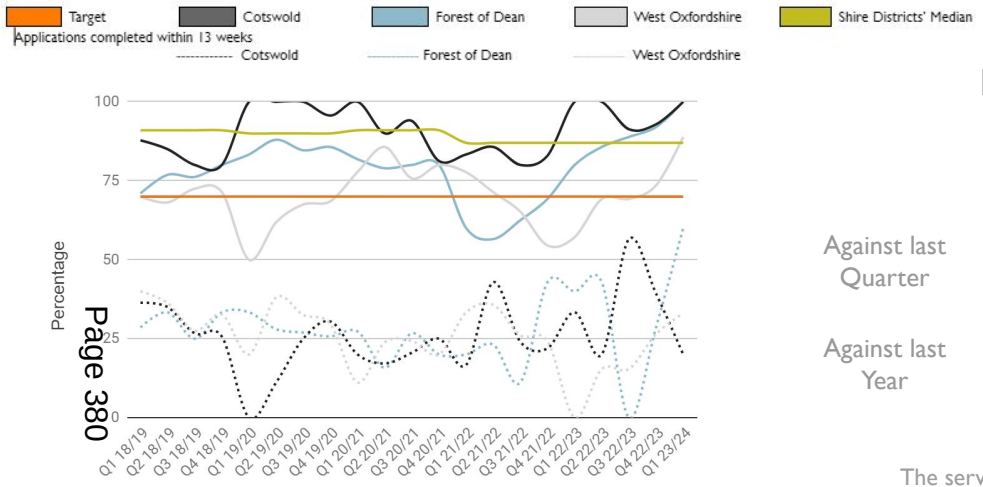
If applications are not acceptable they are being refused early on in the process and if more than "simple tweaks" are required for an application, the Pre-App service is used.

Charges for the Pre-App service were launched in April which has resulted in more revenue and less enquiries. This has had an impact on the turnaround times for applications. Officers consider that if performance continues at this level then risk of special measures is mitigated

Percentage of major planning applications determined within agreed timescales (including AEOT)

COTSWOLD DISTRICT COUNCIL

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Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	↑	↑
Against last Year	→	↑	↑

Target

CDC	FODDC	WODC
70	70	70

The service has also performed very well processing Major applications within times, improving from last year to 100.00% for the quarter.
Five major applications were determined during Q1.

How do we compare?

Major Developments - % within 13 weeks or agreed time
PLEASE NOTE SPARSE PROVIDE BENCHMARK DATA FOR CALENDAR YEARS AND THE CHART ABOVE AND STATS IN THE NARRATIVE ARE ROLLING

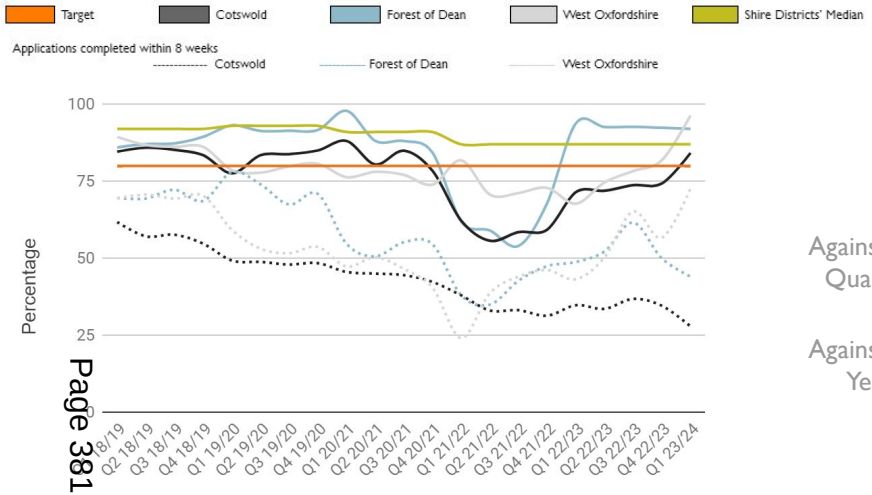
2022 Benchmark	%	District Rank	County Rank	Predominantly Rural Rank	Quartile
Cotswold	87.18	96/181	4/6	42/72	Third
Forest	92.00	63/181	2/6	24/72	Second
West	76.55	164/181	4/5	64/72	Bottom

See slide for Minor Developments for further narrative

Percentage of other planning applications determined within agreed timescales (including AEOT)

COTSWOLD DISTRICT COUNCIL

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Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	↑	↑
Against last Year	↑	↑	↑

Target

CDC	FODDC	WODC
65	65	65

Determination times for Other applications have also improved reaching a rate of 84.21% for the quarter.
This is the first time the target has been exceeded since Q3 2020-21.
247 Other applications were determined in Q1.

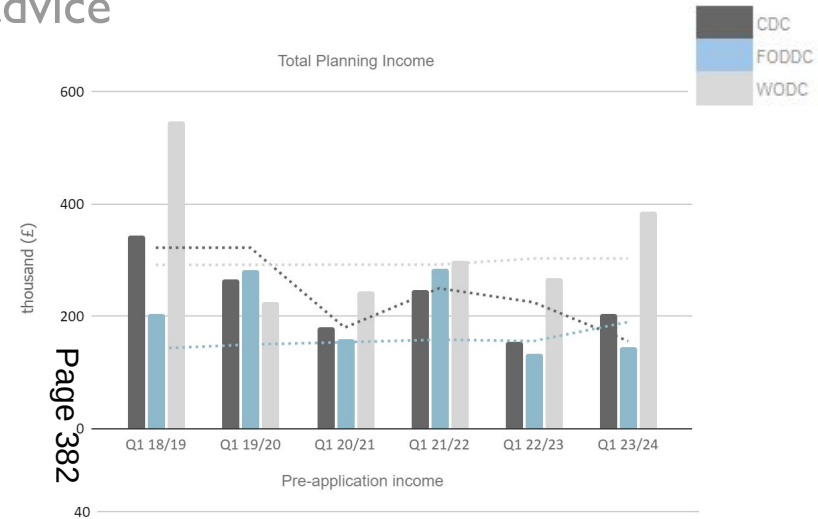
How do we compare?

Other Developments - % within 8 weeks or agreed time
PLEASE NOTE SPARSE PROVIDE BENCHMARK DATA FOR CALENDAR YEARS AND THE CHART ABOVE AND STATS IN THE NARRATIVE ARE ROLLING

2022 Benchmark	%	District Rank	County Rank	Predominantly Rural Rank	Quartile
Cotswold	70.89	172/181	6/6	69/72	Bottom
Forest	91.30	69/181	1/6	26/72	Second
West	75.52	152/181	5/5	61/72	Bottom

See slide for Minor Developments for additional narrative

Total Income achieved in Planning & Income from Pre-application advice



Direction of Travel

Total Income	CDC	FODDC	WODC
Against last Qtr	↑	↓	↓
Against last Year	↑	↑	↑
Pre App Income	CDC	FODDC	WODC
Against last Qtr	↑	↑	↑
Against last Year	↓	↑	↑

Targets Q1

Total Planning Income

155928

Pre App Income

33750

At the end of Q1, total planning income for the Council exceeded the target. In comparison to Q1 2022-23, there has been an increase for total planning income and pre-app income, although the target for Q1 pre-app income was not met.

Due to the cost of living crisis and the slow down in the economy, we may be seeing a slow down in larger developments in particular which could have an impact on income.

It is likely that we will continue to see fewer larger developments due to loss of confidence in the housing market coupled with the fact that the Council has a 5 year land supply so gets fewer speculative applications which tend to attract large fees.

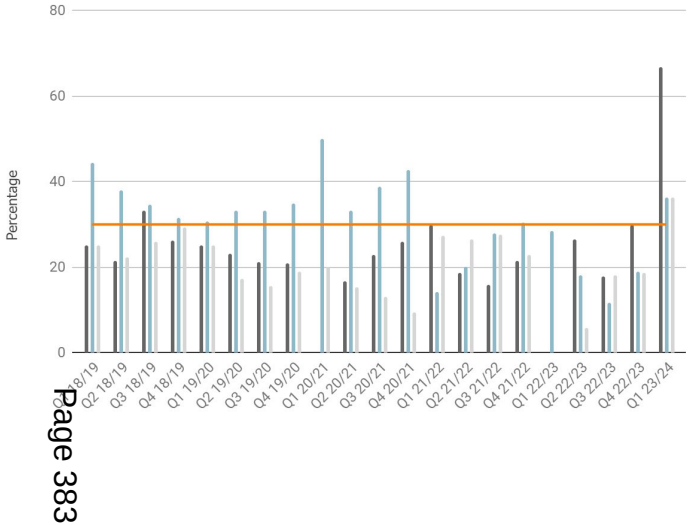
How do we compare?

Planning Advisory Service (PAS) planned to benchmark back in 2021. No data is available in the public domain, but the data team has been in contact with PAS to find further information and are awaiting an update.

COTSWOLD DISTRICT COUNCIL
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Percentage of Planning Appeals Allowed (cumulative)

INDEX



Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	↑	↑
Against last Year	↑	↑	↑

Target

CDC	FODDC	WODC
30	30	30

This indicator seeks to ensure that no more than 30% of planning appeals are allowed (low is good).

Between 1 April 2023 and 30 June 2023, three appeals were decided; of which one decision was supported.

This equates to a percentage of 66.67% which is well above the target. As this metric is cumulative, it may well reduce throughout the year depending on how many appeals are received. As the base number of appeals is so low, which is good, when one or two are lost there is a disproportionate impact on the percentage outcome, which doesn't look favourable. This will need to be tracked over the year.

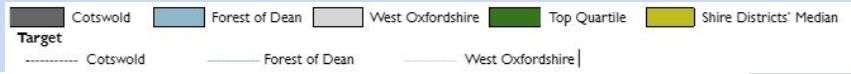
The service reports there has been a substantial reduction in enforcement cases.

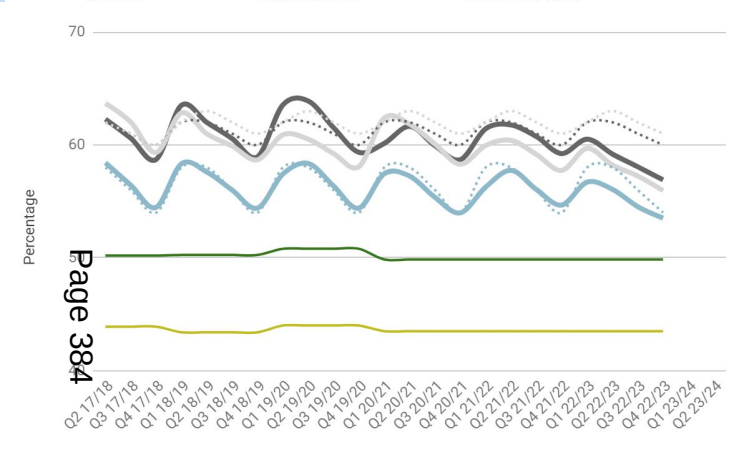
How do we compare?

The Data and Performance Team have been in touch with the Planning Inspectorate to obtain a full data set.

Percentage of household waste recycled

INDEX





Direction of Travel

	CDC	FODDC	WODC
Against last Quarter			
Against last Year			

Target for Q1

CDC	FODDC	WODC
62	58	62

The service is awaiting the data regarding recycling rates for Q1 and this will be updated as soon as they are in

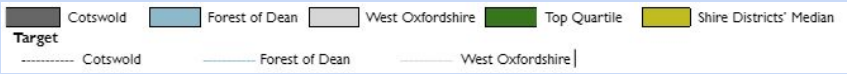
How do we compare?

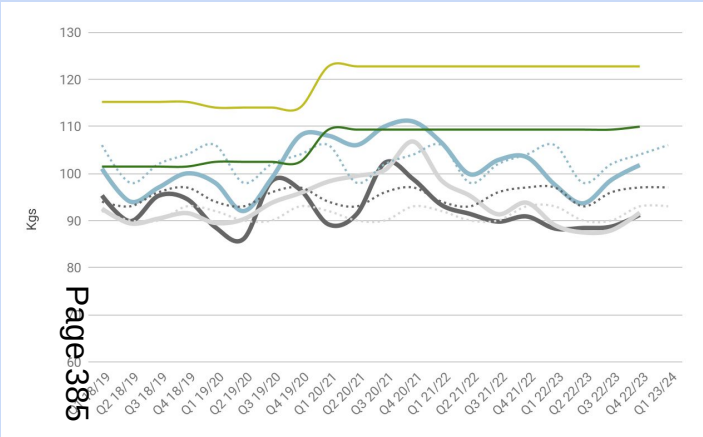
Percentage of household waste sent for reuse, recycling or composting

2021-22 Benchmark	%	District Rank	County Rank	Mainly Rural Rank	Quartile
Cotswold	59.20 %	9/174	1/6	2/37	Top
Forest	54.30 %	25/175	3/6	8/37	Top
West	57.70 %	15/175	3/5	4/37	Top

Residual Household Waste per Household (kg)

INDEX





Direction of Travel

	CDC	FODDC	WODC
Against last Quarter			
Against last Year			

Target for Q1

CDC	FODDC	WODC
97	106	93

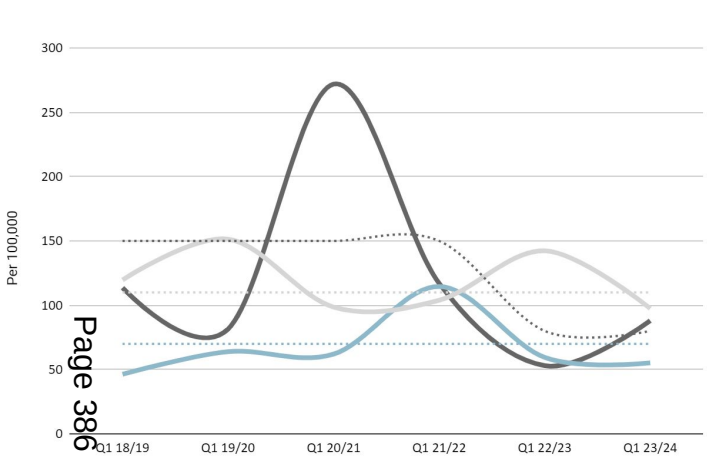
The service is awaiting the data regarding tonnage for Q1 and this will be updated as soon as they are in

How do we compare?

Residual household waste per household (kg/household)

2021-22 Benchmark	Tonnage	District Rank	County Rank	Mainly Rural Rank	Quartile
Cotswold	364.70	16/174	2/6	4/37	Top
Forest	412.10	38/174	4/6	12/37	Top
West	377.90	23/174	4/5	10/37	Top

Missed bins per 100,000



Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	→	↓
Against last Year	↑	↓	↓

Target for Q1

CDC	FODDC	WODC
80	70	110

The number of missed bins per 100,000 increased in Q1 .

The number of missed bins for Q1 are above target and higher than both last quarter and this time last year. This has been attributed to issues with one particular round which has now been rectified. There has been a lack of supervisors at Ubico which could also have had an impact on this figure. Further training will mitigate this.

Note: since the implementation of In-Cab technology, the data source for missed collections is Alloy, In-Cab's back office system. This data source is more accurate than the previous data source.

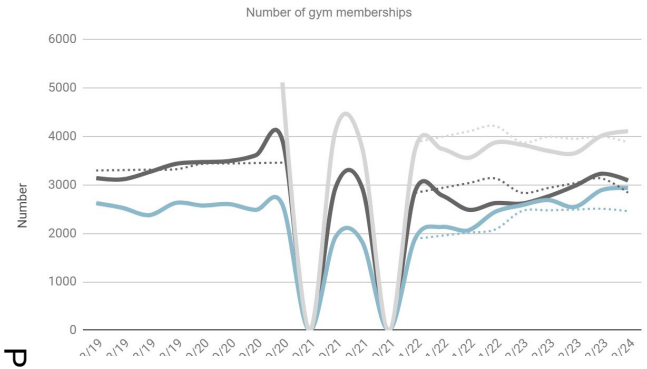
The missed bins target was revised to 80 per 100,000 scheduled collections from 2022-23 Q1 to reflect improvements made over the previous year

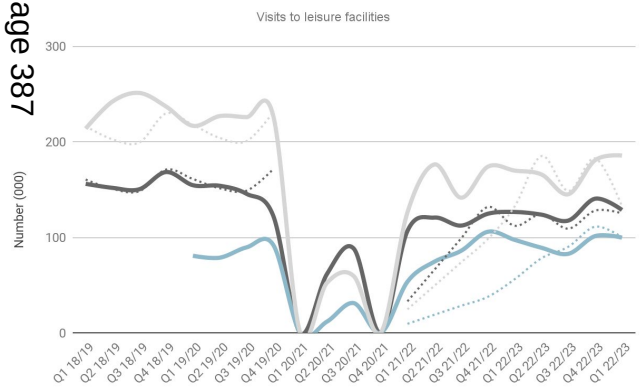
How do we compare?

The Data Team are currently working with partners to compile the data return for APSE performance networks which will then provide benchmarking for this metric.

Number of visits to the three leisure centres & (Snapshot)
Number of gym memberships

INDEX





CDC
FODDC
WODC

Direction of Travel

	CDC	FODDC	WODC
Gym Memberships			
Against last Quarter	↓	↑	↑
Against last Year	↑	↑	↑
Leisure Visits			
Against last Quarter	↓	↓	↑
Against last Year	↑	↑	↑

Target for Q1

	CDC	FODDC	WODC
Gym Memberships	2838	2459	3877
Leisure Visits	125k	100k	180k

The leisure targets were reviewed at the end of 2021-22 which resulted in increases in the target for visitor numbers.

Visits to leisure facilities at Cotswold decreased from last quarter but are 2k plus over this time last year.

Gym memberships remain steady albeit with a slight dip in numbers. An uplift in memberships compared to quarter four 2022-23 is apparent.

Note: Gym memberships were frozen during the first and third lockdowns. No targets were set for 2020-21

How do we compare?

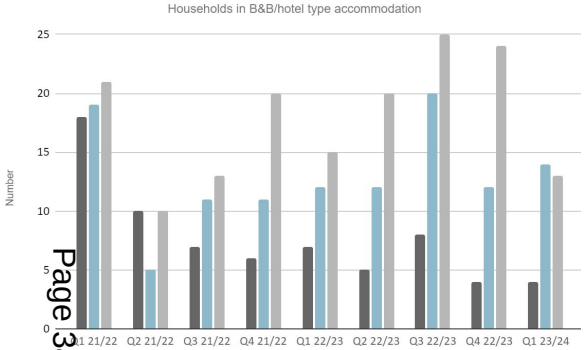
The Data Team are currently working with partners to compile the data return for APSE performance networks which will then provide benchmarking for this metric.

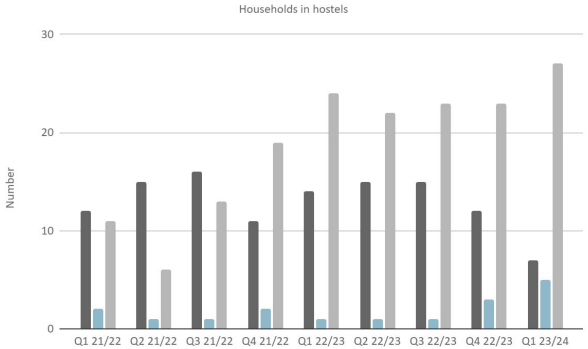
(Snapshot) Number of households in B&B/hotel-type accommodation & Hostels (LA owned or managed); and Number of successful 'Move On' into suitable independent/long-term accommodation from B&Bs/hotels/hostels

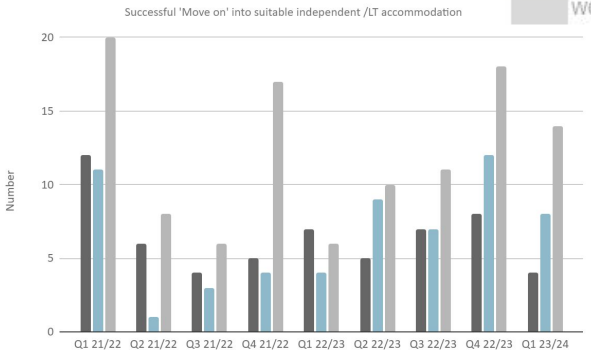
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COTSWOLD DISTRICT COUNCIL

CDC
FODDC
WODC







Direction of Travel

		CDC	FODDC	WODC
Against last Quarter	B&B/Hotels	⇨	⇧	⇩
Against last Year	B&B/Hotels	⇩	⇧	⇩
Against last Quarter	Hostels	⇩	⇧	⇧
Against last Year	Hostels	⇩	⇧	⇧
Against last Quarter	Move Ons	⇩	⇩	⇩
Against last Year	Move Ons	⇩	⇧	⇧

How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

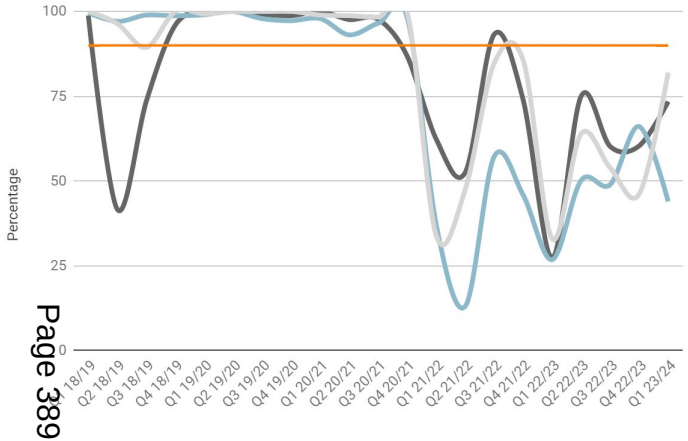
Although homelessness continues to be an issue, the number of households presenting as homeless is going down at Cotswold, largely due to our strong prevention and early intervention focus. This is having a knock on effect in reducing the numbers of in B&B and hostels, and therefore is also reducing the temporary accommodation and move on.

As there has been a reduction in homelessness at Cotswold, West and Forest households have been able to utilise hostels in the district, therefore they are still running at capacity, with costs being recharged to the relevant authority. There are 3 hostels located in Cotswold district, one of which is exclusively for Cotswold Households.

Cotswold DC received a Homelessness Prevention Grant Top aimed at relieving some of the pressures around the Homes for Ukraine scheme. Usage of the grant to provide additional specialist staffing to free up the wider Housing Team has been approved alongside increasing prevention measure.

Further funding to work with Housing Association partners is being explored with the aim of delivering additional affordable properties, further easing pressures on the housing system from the refugee crisis. If deliverable, and developer dependant, these properties may become available in Q3/Q4

Percentage of official land charge searches completed within 10 days



CDC
FODDC
WODC

Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	↓	↑
Against last Year	↑	↑	↑

Target for Q1

CDC	FODDC	WODC
90	90	90

The Councils performance has improved since last quarter and dramatically since last year. Although it is still below the 90% target, sitting at 73%.

The service has been working with internal consultees to build relationships and following these meetings, the consultees now understand the issues that can arise from slow responses.

The service is looking to streamline and this will include further training and discussions so that consultees know what is required of them.

The HLMR project will start later in the year.

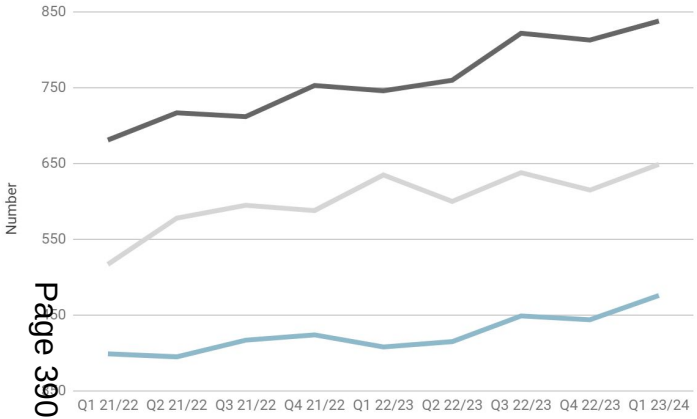
How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

(Snapshot) Long Term Empty Properties

COTSWOLD DISTRICT COUNCIL

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CDC
FODDC
WODC

Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	↑	↑
Against last Year	↑	↑	↑

Target for Q1

CDC	FODDC	WODC
No Target		

Properties continue to be added and removed from the list but as the graph indicates there is an upward trend.

Maintaining registers of long-term empty properties, can help monitor the situation, target interventions, and communicate with property owners more effectively. The LTE list is constantly being addressed with all owners being contacted by email, phone or letter in an attempt to bring properties back into use

There have been challenges within the team due to resource issues which has meant the strategy to identify and tackle the issue of long-term empty properties effectively has lost focus. However, the service reports the resource issue is now resolved and work will resume.

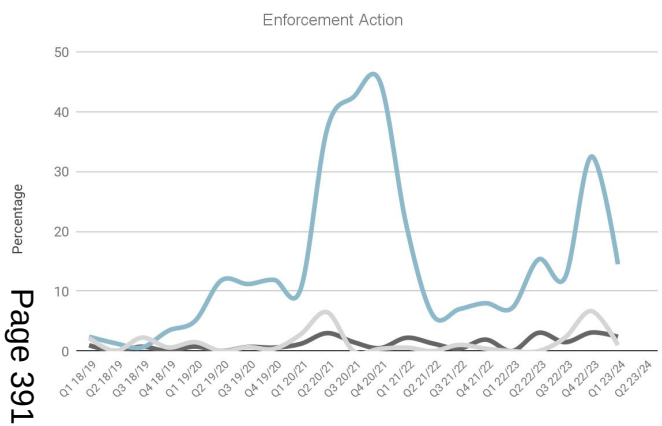
The service reports that properties are staying on the LTE list longer; anecdotal evidence suggests there are difficulties in getting building supplies for refurb work as well as the impact of the cost of living crisis. Most properties are individually owned and have to be followed up individually which is resource intensive, and will not result in the removal of large numbers from the LTE list.

How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

Number of fly tips collected and percentage that result in an enforcement action

(defined as a warning letter, fixed penalty notice, simple caution or prosecution)

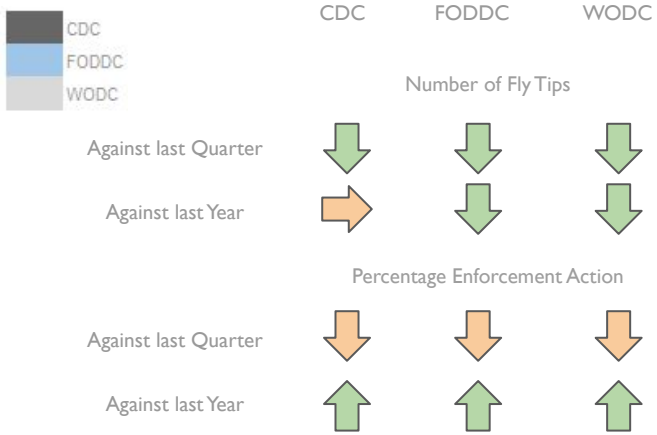


How do we compare?

Number of Fly Tips reported for year 2022-23 for Local Authorities in England
There are 301 authorities with a total of 995545 Fly Tips reported (Range - 34830)

	No. Fly Tips for 2022-23	% Total Fly Tips	Absolute Value from Highest No. Fly Tips	Absolute Value from Lowest No. Fly Tips
Cotswold	1092	0.11%	33738	1092
Forest	1569	0.16%	33261	1569
West	1150	0.12%	33680	1150

Direction of Travel



Target for Q1

CDC FODDC WODC

No Target

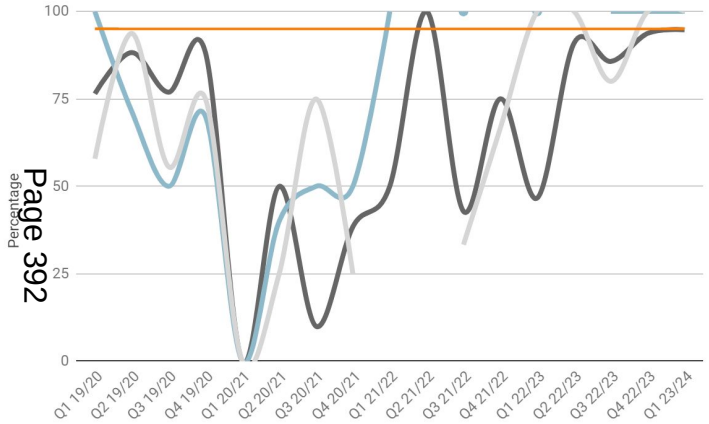
There was a reduction in fly tipping across the district from last quarter. This has been attributed to the installation of CCTV cameras at fly tipping hot spots. This has also facilitated gathering evidence for enforcement action.

Although the enforcement action percentage has dropped to 2.38%, the Council has one case to be heard in September and 3 cases that are being recommended for prosecution including one for fly tipping at Green Lane. Four warning letters and 6 FPNs were issued in the quarter. The amendment for increased powers for Fixed Penalty Notices (FPNs) has not yet been implemented.

The service are also working with Ubico to tackle side waste being left out by residents.

Percentage of high risk food premises inspected within target timescales

INDEX



CDC
FODDC
WODC

Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↑	→	→
Against last Year	↑	→	→

Target for Q1

CDC	FODDC	WODC
95	95	95

The Council had 19 inspections, one of which was not inspected within the allotted time. The premises that was not inspected in time was a family business that worked irregular hours and the inspector needed to visit when they were in production. There have always been a higher number of required inspections in the district as there are more complex businesses within the district.

High risk work is naturally prioritised which can have an impact on lower risk scheduled inspection rates. The service now has a useful dashboard which is helpful for monitoring team performance and tracking lower risk scheduled inspections within the team.

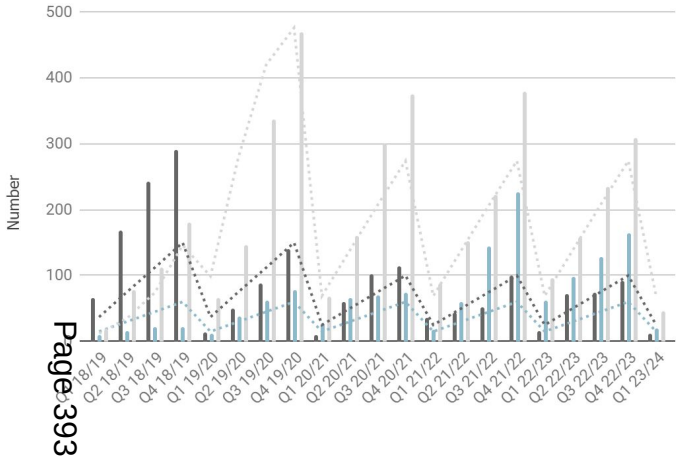
There were two premises that required improvement following scheduled inspections; both of which have all improved to a score of 5.

How do we compare?

APSE performance networks are introducing benchmarking for environmental sectors for 2023-24

Number of affordable homes delivered (cumulative)

INDEX



CDC
FODDC
WODC

Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↓	↓	↓
Against last Year	↓	↓	↓

Target for Q1

CDC	FODDC	WODC
25	15	69

Eleven affordable rent properties have been delivered in Cotswold at Upper Rissington and South Cerney despite the forecast of 68. Following changes within the team, work is underway to contact the Registered Providers (RPs) to assess the situation. Having contacted one of the RPs, the service report that 17 of the forecast properties for Q1, should actually have been forecast for Q1 2024-25.

The service reports that completions fluctuate over the year. A housing development period is at least 12 months, with some schemes phased over several years.

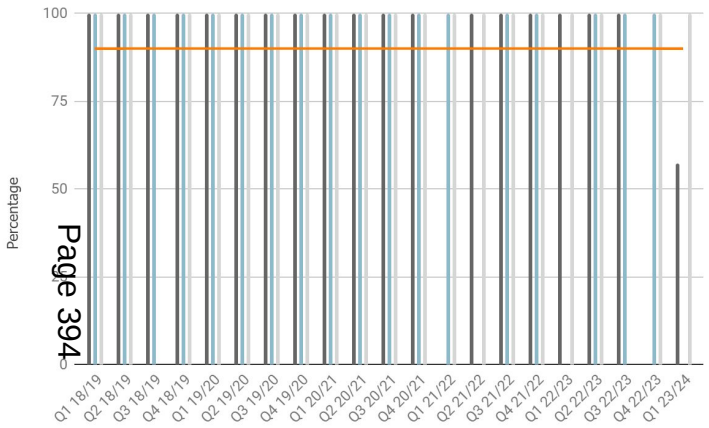
How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

Note: this data is collected cumulatively from the beginning of the financial year to account for peaks and troughs

% High risk notifications risk assessed within 1 working day

(including food poisoning outbreaks, anti-social behaviour, contaminated private water supplies, workplace fatalities or multiple serious injuries)



CDC
FODDC
WODC

Direction of Travel

	CDC	FODDC	WODC
Against last Quarter	↓	↓	→
Against last Year	↓	↓	→

Target for Q1

CDC	FODDC	WODC
90	90	90

There were seven notifications received in Q1, three of which were not reviewed within one working day.

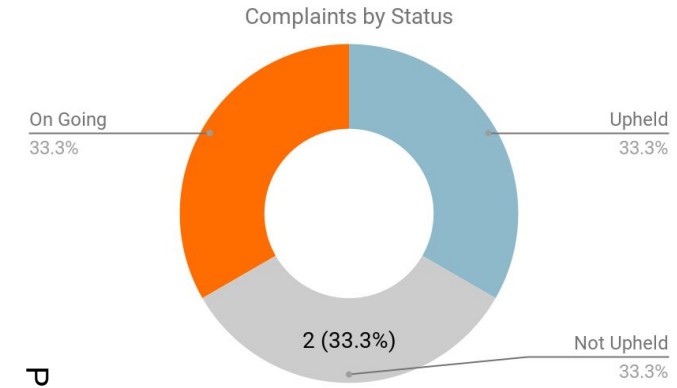
These notifications upon review, did not require a one day urgent response and the services are looking to ensure cases are managed and updated appropriately.

How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

COTSWOLD DISTRICT COUNCIL
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Number of complaints upheld



Direction of Travel

Complaints upheld or partly upheld at Stage 1

	CDC	FODDC	WODC
Against last Quarter	↓	↓	↓
Against last Year	↓	↑	↓

Target for Q1

No Target

Target for 2023/24

No Target

How do we compare?

The complaints and enquiries received in the period by the Ombudsman
The decisions made in the period by the Ombudsman
Compliance with recommendations recorded during the period by the Ombudsman

2022-23	Received	Investigated	Percentage Upheld	Percentage Compliance with Recommendations	Percentage Satisfactory Remedy
Cotswold	10	1	100%	N/A	0%
Forest	6	1	100%	100%	0%
West	12	2	50%	N/A	100%
Similar Organisation			59%	100%	15%

Overall low numbers of complaints with a balanced picture of upheld/not upheld.

See the table on the following page for a breakdown of those upheld and partially upheld.

A new Customer Feedback Procedure went live on the 1st October 2021.
The new process has the following stages:

- Stage 1: Relevant service area responds to complaint within 10 working days
- Stage 2: Complaint is reviewed by Corporate Responsibility Team, response is signed off by relevant Business Manager, and sent to complainant within 10 working days
- Stage 3: Complaint is reviewed by relevant Business Manager, signed off by relevant Group Manager, and sent to complainant within 15 working days

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Complaints Upheld or Partially Upheld Breakdown

COTSWOLD DISTRICT COUNCIL

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Service area	Description	Outcome/learning	Decision	Response time (days)
Council Tax	Ongoing issue with Council Tax dept	Dealt with by Service	Upheld	8
Planning	Complaint via Ombudsman regarding fathers land	Dealt with by Service	Upheld	14

COTSWOLD DISTRICT COUNCIL

Council name	**COTSWOLD DISTRICT COUNCIL**
Name and date of Committee	**CABINET – 04 SEPTEMBER 2023**
Subject	**FINANCIAL PERFORMANCE REPORT – Q1 2023/24**
Wards affected	All
Accountable member	Cllr Mike Evemy, Deputy Leader and Cabinet Member for Finance Email: mike.evemy@cotswold.gov.uk
Accountable officer	David Stanley, Deputy Chief Executive and Section 151 Officer Email: david.stanley@cotswold.gov.uk
Report author	David Stanley, Deputy Chief Executive and Section 151 Officer Email: david.stanley@cotswold.gov.uk
Summary/Purpose	This report sets of the latest budget monitoring position for the 2023/24 financial year.
Annexes	Annex A – Revenue Budget Summary Annex B – Capital Programme Summary Annex C – Non-Treasury Management Prudential Indicators
Recommendation(s)	*That Cabinet resolves to:* *1) Review and note the financial position set out in this report* *2) Endorses the recommendation in paragraph 8.3 that the Cabinet Transformation Working Group review in-year opportunities with Publica and Ubico and provide Cabinet with an update in November on options to mitigate the forecast financial position.*
Corporate priorities	• Delivering our services to the highest standards
Key Decision	No
Exempt	No
Consultees/ Consultation	None

COTSWOLD DISTRICT COUNCIL

1. BACKGROUND

1.1 This report provides members with the first outturn forecast and monitoring position statement for the 2023/24 financial year and should be viewed as an update to the *2023/24 Financial Performance – High-Risk Budgets* report considered by Cabinet in July 2023.

1.2 The purpose of this report is to notify members of any significant variations to budgets identified in the initial budget monitor exercise, highlight any key financial issues, and to inform members of options and further action to be taken.

1.3 In common with the almost all local authorities, the council faces several external budget pressures that are impacting on its finances over the medium-term. There remains significant uncertainty around inflation and interest rates in the current financial year which exert an influence over the Council's budget both directly and indirectly.

2. EXECUTIVE SUMMARY

2.1 This report sets out the outturn forecast for the financial year informed by the Q1 budget monitoring.

2.2 Based on the budget monitoring exercise undertaken for Q1 and an assessment of the risks and uncertainties facing the Council, the outturn forecast is and adverse variation of £0.448m

COTSWOLD DISTRICT COUNCIL

Table ES1 – Revenue Budget Outturn Forecast (Q1)

Revenue Budget	2023/24 Latest Net Budget (£'000)	2023/24 Actuals to Q1 (£'000)	2023/24 Outturn Forecast (£'000)	2023/24 Outturn Variance (£'000)
Subtotal Services	**17,491**	**5,979**	**17,894**	**403**
Less: Reversal of accounting adjustments	(1,636)		(1,636)	0
Revised Subtotal Services	**15,856**	**5,979**	**16,258**	**403**
Corporate Income & Expenditure	(1,492)	(174)	(1,847)	(355)
Provisions and Risk Items	0	0	400	400
Net Budget Requirement	**14,363**	**5,805**	**14,812**	**448**
Funded by:				
Council Tax	(6,311)		(6,311)	0
Retained Business Rates	(4,389)		(4,389)	0
Government Funding - Grants	(2,905)		(2,905)	0
Government Funding - NHB	(290)		(290)	0
Collection Fund (surplus) / Deficit	393		393	0
TOTAL Funding	**(13,503)**	**0**	**(13,503)**	**0**
Budget shortfall/(surplus)	**861**		**1,309**	**448**

Table ES2 – Revenue Budget – Reconciliation of variations (Q1)

Variations at a glance	Positive variation (£'000)	Adverse Variation (£'000)
Fees & Charges - Income Shortfall		270
Overspend - Waste & Recycling containers		50
Commercial Property - Rental income shortfall (risk)		66
Pay Award (risk)		400
Savings Target shortfall (risk)		100
Other service variations		59
Ubico Contract forecast underspend	(42)	
Treasury Management Income	(200)	
Reduced Revenue financing of Capital programme	(100)	
Other Corporate Income and Expenditure	(154)	
Subtotal	**(496)**	**945**
Net Outturn Variation		**448**

The material forecast variations are listed below with a detailed table of all service variations in Annex A. Please note that the actual spend to date shown in Table ES1 differs from the detailed position shown in Annex A as this adjusts for the timing difference on Housing Benefit Payments and 2022/23 accruals.

- Building Control income is below budget with a lower number of applications in quarter one when compared to the same period in prior year (121 applications compared to 175 in Q1 2022/23) in part due to continuing financial climate and uncertainty, £0.124m income shortfall forecast.
- Public Convenience income shortfall due to reduced footfall. Forecast income shortfall of £0.076m.
- Household waste bins, bags and containers - overspend forecast of £50k, overspend due to increased demand, increased cost of materials and longer lead times.
- Land charge income is performing below budget with income received forecast to be £70k below budget at the end of the financial year in part due to the rise in free unofficial personal searches as well as current economic uncertainty leading to a reduced demand.
- Ubico are currently forecasting a net underspend of £42k as a result of lower than estimated diesel costs, savings from resource changes to garden waste service delivery netted off forecast external support to undertake modelling of options for waste and recycling rounds, higher repairs and vehicle hire costs for garden waste vehicles.

2.3 The adverse income variations outlined above are unlikely to recover in the current financial year with an under performance against income budgets in previous financial years. This will need to be addressed for the 2024/25 budget and over the MTFS period.

2.4 The Cabinet Transform Working Group (CTWG) will continue to consider the forecast outturn, financial risks and uncertainties set out in this report. The CTWG will specifically be considering proposals from service delivery partners to contribute to the Council's Savings plans and will be closely monitoring the achievement of savings targets.

2.5 Without any improvement in the forecast outturn for the year, corrective action or additional savings the outturn variation would have to be met from the Financial Resilience reserve. Clearly, this is not a desirable outcome and further management action must be taken by the Council, Publica and Ubico to mitigate the current forecast position. Members should note that the budgeted use of the Financial Resilience reserve utilised to set a balanced budget was £0.861m. Without mitigating and corrective action, this would increase to £1.309m and is clearly not an acceptable position.

2.6 A summary of the Capital Programme outturn forecast is shown in the table below.

Table ES2 – Capital Programme Outturn Forecast (Q1)

Capital Programme	2023/24 OB (£'000)	Slippage From 2022/23 (£'000)	2023/24 LAB (£'000)	2023/24 Actuals to Q3 (£'000)	2023/24 Outturn Forecast (£'000)	2023/24 Outturn Variance (£'000)
Leisure & Communities	1,387	4	1,391	(28)	1,391	0
Housing/Planning and Strategic Housing	4,001	208	4,209	1,763	3,918	(291)
Environment	1,956	173	2,129	(85)	583	(1,546)
Retained & Corporate	0	0	0	0	0	0
ICT, Change and Customer Services	350	65	415	0	100	(315)
UK Rural Prosperity Fund	191	0	191	0	191	0
UK Shared Prosperity Fund Projects	28	0	28	0	28	0
Land, Legal and Property	500	370	870	0	870	0
Transformation and Investment	5,486	294	5,780	81	1,216	(4,564)
TOTAL Capital Programme	**13,899**	**1,114**	**15,013**	**1,731**	**8,297**	**(6,716)**

2.7 As set out in the *Financial Performance Report 2022/23 Outturn* report to Cabinet in July 2023, slippage of £1.114m from the 2022/23 capital programme has been included in the revised capital programme set out in Table ES2 above. The initial outturn forecast for the current year is an underspend of £6.716m with slippage likely of £2.027m.

2.8 The forecast assumes that the Strategic Property Acquisition (included in the summary line Transformation and Investment) will not proceed in the current financial year. With interest rates remaining relatively high, any future acquisition decision will need to be supported by a full business case setting out the wider benefits and financial impact over the immediate and longer-term.

2.9 The report outlines a number of risks and uncertainties regarding the outturn forecast, particularly around income performance assumptions given the volatility.

2.10 Financial Sustainability – The 2023/24 revenue budget is held in balance through the use of £0.861m of the Financial Resilience Reserve. It should be noted that without any improvement in the forecast during the year, corrective action or additional savings the outturn variation would have to be funded from the same reserve at year end. Clearly, this is not a desirable outcome and further management action must be taken by the Council, Publica and Ubico to mitigate the current forecast outturn.

2.11 When taken with the 2023/24 Revenue Budget, the Council would be utilising £1.309m of the Financial Resilience reserve to support the budget which is not sustainable over the medium-term.

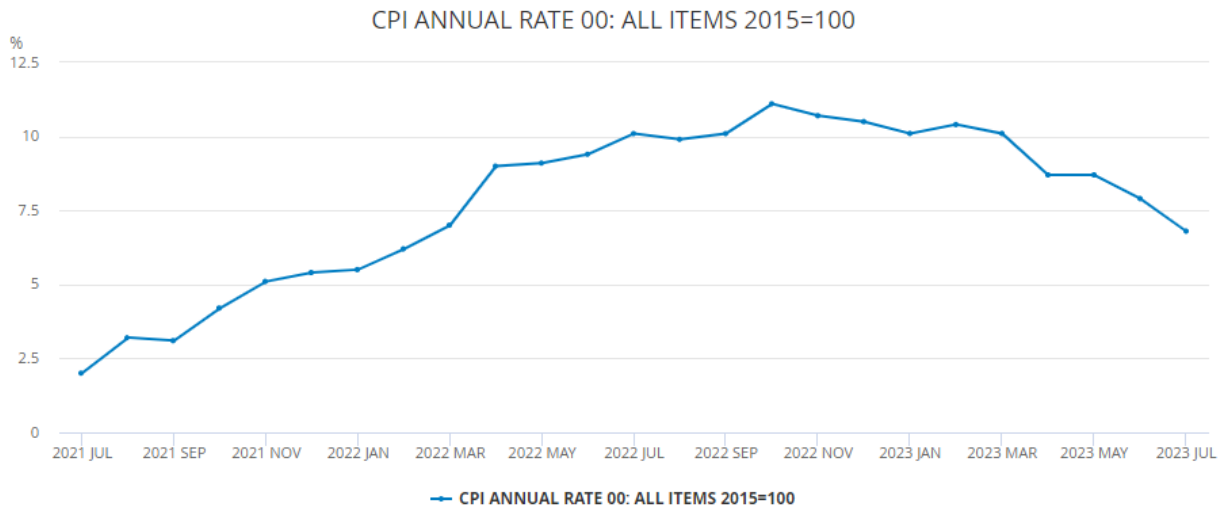
2.12 Financial Performance reports will be presented to members at the December 2023 and March 2024 Cabinet meetings.

3. EXTERNAL ECONOMIC ENVIRONMENT

3.1 The *2023/24 Financial Performance – High-Risk Budgets* report to Cabinet in July 2023 set out the external economic pressures on the Council.

Inflationary Pressures

3.2 The level of inflation, as measured by the Consumer Prices Index, for July 2023 is 6.8% (7.9% in June 2023). Although it is not the Government's preferred measure of inflation, the Retail Prices Index is 9.0% (10.7% in June 2023). Core inflation (as defined by the Office for National Statistics as the CPI Rate excluding energy, food, alcohol and tobacco) remained at 6.9% (no change from June 2023). It is this measure that has concerned the Bank of England and led to increases in interest rates.



3.3 Although general inflation has reduced since the start of the calendar year, the Council is subject to specific inflationary pressures on its services (e.g. fuel costs on waste and recycling service) which have tended to track higher than CPI and RPI.

3.4 The Council will need to take into account the inflationary pressures when monitoring financial performance during the year and in assessing the impact on 2024/25 revenue and capital budgets.

Inflationary Pressures – Pay Award

3.5 With inflation remaining relatively high and not reducing as quickly as anticipated, this may lead to higher wage demands for both private and public sector workers.

3.6 The assumption made for the 2023/24 budget was for an average Pay Award of 4% across Publica, Ubico and Retained staff. Inflationary provision of £1.2m has been included in the budget for the pay award across Publica and Ubico contracts and for retained staff costs.

3.7 Local Government employers made a final offer to the unions in March 2023. With effect from 01 April 2023, the offer made by employers was:

- an increase of £1,925 (pro rata for part-time employees) to be paid as a consolidated, permanent addition on all NJC pay points 2 to 43 inclusive (equating to an increase of between 3.88% and 9.42% depending on the paygrade)
- an increase of 3.88% on all pay points above the maximum of the pay spine but graded below deputy chief officer
- an increase of 3.88% on all allowances

3.8 For reference, the financial implications of the employers offer outlined above would have been broadly similar in terms of cost when compared to 2022/23 although the Council has allowed for a higher level of pay inflation in the current year's budget. **The estimated additional financial impact of the employers offer would be around £0.400m.**

3.9 The unions have rejected this offer and are seeking a pay increase of RPI Inflation plus 2% at every spinal column point. **The estimated additional financial impact of the union proposal would be around £0.700m.**

3.10 At the time of writing this report it is unclear when the pay award will be settled and at what level. Unison undertook a disaggregated ballot of members on strike action but fell short of the 50% legal threshold required to strike in a national ballot (75% of members voted in favour of strike action but on a turnout of 31%). In a response to a joint letter from Local Government unions dated 16 August 2023 seeking an improved pay offer, Local Government employers reaffirmed the position that the *"employers' offer has been repeatedly and unanimously reaffirmed as full and final since it was made on 23 February."*

Energy Costs

3.11 The 2023/24 budget and MTFS recognised the significant increase in Energy prices experienced during the previous financial year. Government support for businesses through the energy price cap ended in March 2023.

3.12 Retail prices remain well above the pre-2021 average meaning the Council will continue to pay much more for energy than it did prior to 2021/22. At this stage it is too early to assess whether the additional amounts included in the budget are adequate. The Council is investing in measures to provide green energy (Solar PV) and to reduce its energy consumption over the medium-term.

Interest Rates

3.13 The Bank of England has increased interest rates 14 times since December 2021 in an effort to mitigate inflationary pressures with the latest increase of 0.25% taking the base rate to 5.25% on 04 August 2023. The council's treasury management advisors have forecast further increases during the year with an expectation that the base rate may peak at 5.50% to 5.75%.

3.14 In order to support the Capital Programme, the Council may need to undertake borrowing during the current financial year although this is dependent on a number of factors. Clearly, with PWLB interest rates remaining relatively high compared to the previous 12 years, this will impact the expenditure required to service any borrowing the Council undertakes.

3.15 The Council has limited and reducing internal resources to support the capital programme (capital receipts, earmarked reserves). This is not unique to Cotswold District Council with reports in specialist press (e.g. Public Finance) of Councils shelving or scrapping planned capital projects as others costs continue to rise and/or the need to find savings to balance the budget.

3.16 With interest rates expected to remain relatively high during the financial year, the Council will need to ensure capital expenditure and capital financing decisions are made 'in the round'. This will ensure that existing and new capital schemes are not considered in isolation and are prioritised against the Council's Corporate Plan and reference to affordability and deliverability.

3.17 An updated Asset Management Strategy is being prepared which will review and assess the Council's assets and bring forward recommendations for the retention or disposal of the Council's land and property holdings linked to the Council's Corporate Plan and Medium-Term Financial Strategy (MTFS). Asset disposals would generate a capital receipt which could be utilised in place of external borrowing. The Asset Management Strategy will be considered by Cabinet in the autumn.

4. 2023/24 REVENUE BUDGET

4.1 The Revenue Budget was approved by Council at their meeting on 15 February 2023 with no adjustments made during the financial year to date.

Table 1 – Revenue Budget reconciliation

Budget Item	(£'000)
Original Budget (Council, 15 February 2023)	14,363
Adj:	
Adj:	
Adj:	
Adj:	
Latest Budget	**14,363**

4.2 At 30 June 2023 the Council's financial system shows unadjusted net expenditure of £5.805m against the profiled budget of £3.132m. Please note that the actual spend to date shown in Table ES1 differs from the detailed position shown in Annex A as this adjusts for the timing difference on Housing Benefit Payments and 2022/23 accruals. The financial position is expected to remain challenging during the financial year with the Council facing significant budget pressures as outlined earlier in the report.

4.3 The outturn forecast for 2023/24 of £14.812m results in a forecast variance of £0.448m. Table 2 provides members with an overview of the significant outturn variations that have been forecast across services with Tables 3 and 4 providing detail on the non-service revenue expenditure and income budgets.

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Table 2 – Revenue Budget Outturn Forecast summary

Revenue Budget	2023/24 Latest Net Budget (£'000)	2023/24 Actuals to Q1 (£'000)	2023/24 Outturn Forecast (£'000)	2023/24 Outturn Variance (£'000)
Environmental & Regulatory Services	485	136	614	129
Business Sup. Svcs - Finance, HR, Procurement	1,120	445	1,120	0
ICT, Change & Customer Services	2,359	565	2,359	0
Assets, Property & Regeneration	718	231	808	90
Publica Executives and Modernisation	131	33	131	0
Revenues & Housing Support	615	1,089	615	0
Environmental Services	4,808	1,061	4,891	83
Leisure & Communities	1,918	(169)	1,953	35
Planning & Strategic Housing	1,947	1,775	1,947	0
Democratic Services	1,114	501	1,114	0
Retained and Corporate	2,277	313	2,343	66
Subtotal Services	**17,491**	**5,979**	**17,894**	**403**
Less: Reversal of accounting adjustments	(1,636)		(1,636)	0
Revised Subtotal Services	**15,856**	**5,979**	**16,258**	**403**
Corporate Income & Expenditure	(1,492)	(174)	(1,847)	(355)
Provisions and Risk Items	0	0	400	400
Net Budget Requirement	**14,363**	**5,805**	**14,812**	**448**
Funded by:				
Council Tax	(6,311)		(6,311)	0
Retained Business Rates	(4,389)		(4,389)	0
Government Funding - Grants	(2,905)		(2,905)	0
Government Funding - NHB	(290)		(290)	0
Collection Fund (surplus) / Deficit	393		393	0
TOTAL Funding	**(13,503)**	**0**	**(13,503)**	**0**
Budget shortfall/(surplus)	**861**		**1,309**	**448**

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Table 3 – Corporate Income and Expenditure

Corporate Income and Expenditure	2023/24 Revised Budget to Q1 (£'000)	2023/24 Actuals to Q1 (£'000)	2023/24 Outturn Forecast (£'000)	2023/24 Outturn Variance (£'000)
Contingency, other non-service income and expenditure	134	327	0	(134)
Savings & Transformation Items (See Tables 5a and 5b)	(500)		(400)	100
Treasury Management - Interest Payable	99	0	99	0
Treasury Management - Interest Receivable	(817)	(274)	(1,017)	(200)
Minimum Revenue Provision (MRP)	17	0	17	0
Revenue Contribution to Capital Outlay (RCCO)	200	0	100	(100)
Transfer to/(from) Earmarked Reserves	(625)	0	(645)	(20)
	(1,492)	**53**	**(1,847)**	**(355)**

Table 4 – Provisions and Risk

Provisions and Risk	2023/24 Profiled Budget to Q1 (£'000)	2023/24 Actuals to Q1 (£'000)	2023/24 Outturn Forecast (£'000)	2023/24 Outturn Variance (£'000)
Ubico Pay Inflation			200	200
Ubico Growth			0	0
Energy Costs			0	0
Publica Pay Inflation			200	200
Forecast Risk			0	0
	0	**0**	**400**	**400**

Key variations

4.4 The forecast outturn position is a net overspend/adverse variance of £0.572m Without any improvement in the forecast during the year, corrective action or additional savings the outturn variation would have to be funded from the Financial Resilience reserve at year end. Clearly, this is not a desirable outcome and further management action must be taken by the Council, Publica and Ubico to mitigate the current forecast outturn position. Members should note that the budgeted use of reserve utilised to set a balanced budget was £0.861m. Without mitigating and corrective action this would increase to £1.433m and is clearly not an acceptable position.

4.5 Annex A provides a detailed analysis and includes commentary against the most significant variances. This report highlights a number of budget variances across a range of service areas; excluding those where the income and expenditure variance are comparable and offset against each other (net nil variance).

4.6 The material items which have had an impact on the Council's revenue budget are summarised below with narrative explaining the reasons(s) for the variation in the paragraphs that follow.

- Forecast underachievement of income – Building Control (£0.124m), Land Charges (£0.070m), Public conveniences (£0.076m)
- Pay Award risk (£0.400m adverse) – see paragraphs 3.5 to 3.10 and 4.26 to 4.27
- Savings Target Risk (£0.100m adverse) – see Section 5 of the report
- Treasury Management performance (£0.200m positive variation)
- Other Corporate Income and Expenditure budgets (£0.254m positive variation)

4.7 The building control service operates in a competitive market, although the Council has retained its market share income is below budget with a lower number of applications in quarter one when compared to the same period in prior year (121 applications compared to 175 in Q1 2022/23) in part due to continuing financial climate and uncertainty, £0.124m income shortfall forecast.

4.8 Income from land charges is below budget with income received forecast to be £70k below budget at the end of the financial year due in part to the rise in free unofficial Personal Searches (through Personal Search Agents). Current economic uncertainty, the rise in interest rates and inflation along with forecasts of falls in house prices into 2023 and 2024 will inevitably lead to a reduced demand for this service.

4.9 Public Convenience income shortfall due to reduced footfall. Forecast net overspend of £0.076m. Cabinet approved increases to the service charges for the Council's Public Conveniences from 01 April 2023. The service requires an ongoing subsidy of £0.194m given the cost of maintaining the 15 sites the Council operates. There has been a reduced level of usage since the Covid pandemic with an income shortfall of £32k in 2021/22 and £26k in 2022/23.

4.10 Household waste bins and receptacles – an overspend is forecast of £50k, due to increased demand, increased cost of materials and longer lead times. This will be monitored throughout the year and reviewed as part of the 2024/25 budget setting process with consideration of developer contributions.

4.11 There is a risk that the Council will not receive the budgeted level of commercial rental income given the challenging economic conditions across retail and office sectors and downward pressure on rents. An income shortfall of £0.066m is currently forecast but will be reviewed for the Q2 report alongside the wider Asset Management Strategy.

4.12 Where income shortfalls have been forecast, it is expected that Business Managers and Assistant Directors evaluate options for corrective action. It is unlikely income will recover in the current financial year and may have a detrimental impact on the Council's finances over the medium-term. The evaluation must include an assessment of the service cost and income, market positioning, and unit cost and benchmarking data analysis. Options should outline, if possible, how the service can be delivered in a financially sustainable way.

4.13 The Council's Environmental Services (grounds maintenance, street cleaning, domestic waste collection, recycling collections etc.) are provided by Ubico Ltd. The contract with Ubico for 2023/24 of £8.275m is currently estimated to cost £8.232m – a net variation of £0.043m. The net reduction is a result of lower than budgeted diesel costs (fuel rate reduced from £1.45 p/l to £1.25 p/l), reduced staff costs from changes made to garden waste rounds. There are forecast increases in expenditure from higher repair, maintenance and hire costs of the garden waste fleet as a result of ageing vehicles which are due to be replaced imminently.

4.14 The tables below provides members with an overview of the financial performance of the Ubico Contract (Table 5a) and non-Ubico expenditure and income from fees and charges (Table 5b)

Table 5a – Ubico Contract Outturn Forecast (Q1)

Waste, Recycling, Street Cleaning and Grounds Maintenance Services	Ubico Contract Costs OB (£'000)	Ubico Contract Costs CS (£'000)	Outturn Forecast (£'000)	Outturn Variance (£'000)
WST004 Bulky Household Waste	0	0	0	0
Car Parks GM [CTW668]	63	63	65	2
CCM001 Cemetery/Churchyards GM [CTW688]	175	175	180	5
RYC002 Garden Waste Collection [CTW634]	1,315	1,316	1,336	20
WST001 Household Waste [CTW611]	1,622	1,623	1,614	(9)
RYC001 Recycling [CTW633]	2,933	2,935	2,897	(38)
RYC003 Refuse/Recycling/Food Waste [CTW635]	685	686	680	(6)
STC001 Street Cleaning [CTW666]	1,465	1,466	1,451	(16)
Trinity Road Offices GM [CTW668]	16	16	16	0
Grand Total	**8,275**	**8,281**	**8,239**	**(42)**

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Table 5b – Ubico, Non-Ubico, Fees & Charges performance (Q1)

Waste, Recycling, Street Cleaning and Grounds Maintenance Services	Gross Service Cost LAB (£'000)	Income LAB (£'000)	Net Service Cost (£'000)	Exp^{n} Forecast (£'000)	Income Forecast (£'000)	Net Service Forecast (£'000)	Net Service Variation (£'000)
WST004 Bulky Household Waste	57	(79)	(22)	57	(79)	(22)	0
Car Parks GM [CTW668]	63	0	63	65	0	65	2
CCM001 Cemetery/Churchyards GM [CTW688]	175	0	175	180	0	180	5
RYC002 Garden Waste Collection [CTW634]	1,353	(1,301)	52	1,373	(1,301)	72	20
WST001 Household Waste [CTW611]	1,781	(24)	1,757	1,822	(24)	1,798	41
RYC001 Recycling [CTW633]	3,245	(950)	2,295	3,207	(950)	2,257	(38)
RYC003 Refuse/Recycling/Food Waste [CTW635]	686	0	686	680	0	680	(6)
STC001 Street Cleaning [CTW666]	1,504	0	1,504	1,489	0	1,489	(16)
Trinity Road Offices GM [CTW668]	16	0	16	16	0	16	0
Grand Total	**8,880**	**(2,353)**	**6,527**	**8,888**	**(2,353)**	**6,535**	**8**

4.15 Performance against the Ubico Savings Target is outlined in Section 5 of this report

Treasury Management

4.16 Dividends from the Council's longer term investments (Pooled funds and Real Estate Investment Trusts) of £0.138m were received in the first quarter of the financial year achieving a return of over 5.3% (pooled funds) and around 2.8% (REIT). Interest from short term cash deposits with the Debt Management Office (DMO) was £0.1m by the end of the first quarter due to larger surplus balances than estimated being available to invest and interest rates rising at higher rate than budgeted. Investment income is forecast to be £0.200m higher than budgeted at the end of the financial year.

4.17 With the expectation of improved investment returns during the financial year, it was agreed at July Cabinet that any additional investment income above the budgeted level is transferred to a new earmarked reserve ("Treasury Management Risk") to manage higher borrowing costs in the short-term and to mitigate potential changes to the accounting treatment of gains and losses on pooled funds from March 2025.

4.18 Council approved the Capital Strategy and the Treasury Management Strategy (including the Non-Treasury Management Investment Strategy) at their meeting on 15 February 2023. Audit and Governance Committee have responsibility for reviewing and monitoring treasury management arrangements in accordance with the CIPFA Treasury Management Code and receiving performance reports. The Council adopted the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice (the CIPFA Code) which requires the Council to approve, as a minimum, treasury management semi-annual and annual outturn reports.

4.19 The CIPFA Code was updated in 2021 and includes the new requirement, mandatory from 1st April 2023, of quarterly reporting of the treasury management prudential indicators. The non-treasury prudential indicators are expected to be included in the Council's usual revenue and capital monitoring reports.

4.20 The Council's Treasury Management Strategy for 2023/24 was approved at a meeting on 15 February 2023. Audit and Governance Committee will consider the Q1 treasury management indicators at their meeting in October 2023.

4.21 An overview of the non-treasury management performance is set out in Section 6 of the report (Capital Programme) with Annex C providing further details of the relevant prudential indicators.

Corporate Income and Expenditure, Provisions and Risk

4.22 As outlined in Tables 3 and 4 there are a number of significant variations forecast across the Corporate Income and Expenditure budgets. These budgets support the General Fund Revenue budget and are typically the non-service items such as Treasury Management, financing, contingency budget and provisions for risk.

4.23 Paragraphs 4.15 and 4.16 highlighted the performance of the Council's Treasury Management Investments, largely due to the higher than anticipated interest rates. The outturn forecast is additional income of £0.200m.

4.24 The Council has in prior years financed ICT capital expenditure from the revenue budget – typically around £0.200m per annum. With the outturn forecast on ICT Capital indicating expenditure of £0.100m for the year the forecast for the revenue contribution (RCCO) has been matched leading to an underspend of £0.100m. Members will need to consider how ICT Capital expenditure should be financed in future years given the budget gap forecast in 20204/25 and over the MTFS period.

4.25 The 2023/24 revenue budget includes a net transfer from earmarked reserves of £0.645m to fund specific related expenditure – predominantly around new burdens and homelessness. A further £20k transfer from the Transformation and Investment Programme reserve is proposed to fund external consultancy commissioned by Ubico to support the delivery of future savings and efficiencies.

4.26 Paragraphs 3.5 to 3.10 set out the current position regarding the 2023/24 Pay Award which remains uncertain in terms of timing and impact on the Council's finances. The assumption made at the time the budget was set was for the pay award to increase staff costs by 4% and has been included in service budgets and the Ubico contract sum. An additional amount is held as a contingency on the basis of the uncertain inflation environment.

4.27 Therefore, a significant element of the financial impact from the pay award (when agreed) is already provided for in the budget. The amount over and above this, (the estimated additional financial impact of the employers offer would be around £0.400m) represents the unfunded risk and is notionally identified as a provision on the revenue budget.

4.28 A contingency budget is held centrally to mitigate any in-year cost pressures from inflation or other unforeseen events. This is reported as uncommitted to in-part offset the pay award risks highlighted in the paragraphs above.

5. SAVINGS AND TRANSFORMATION PROGRAMME DELIVERY

5.1 The 2023/24 Revenue Budget includes savings, cost reduction and additional income of £1.510m to mitigate budget pressures and to enable a balanced budget to be achieved. This included third party contract savings (£0.500m), expenditure savings (£0.456m), additional income from fees and charges (£0.415m), and corporate savings (£0.139m).

5.2 Savings proposals were reviewed to ensure they were robust and could be delivered. There is always a risk with a savings programme – savings may not be delivered in full or on time. Close monitoring of the savings programme through the Cabinet Transform Working Group (CTWG) and through the quarterly financial performance reporting is important to highlight any issues and for action to be taken to brings savings or the budget back in line.

5.3 This section sets out the current forecast position on the delivery of the savings agreed as part of the revenue budget identifying any issues and options available to the Council to address under delivery.

5.4 CTWG's role is primarily to receive regular updates on progress against the Council's Savings and Transformation programme (including Publica and Ubico savings and efficiencies targets) as part of an ongoing strategy to mitigate the budget gap, any further adverse variation that may arise during the year, and to assess proposals for 2024/25 and later financial years.

5.5 Table 6a provides members with a summary of position at the end of Q1.

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Table 6a – Savings Update

Savings already adjusted out of Service Budgets	2023/24 Budget Removed (£'000)	Tracker	2023/24 Forecast Position (£'000)	2023/24 Variation (£'000)
Corporate Savings				
LGPS - Secondary Rate (PIA) (Budget savings)	(139)	Underway/On-Track/Complete	(139)	0
Expenditure Savings				
Remove permanent funding for Crowdfunding platform	(85)	Underway/On-Track/Complete	(85)	0
Insurance Premium	(47)	Underway/On-Track/Complete	(30)	17
Rationalisation of Postage	(20)	Slippage in Savings Delivery	(11)	9
Rationalisation of MFDs (Multifunction Devices)	(25)	Underway/On-Track/Complete	(25)	0
Google / MS 365 Procurement proposal	(10)	Underway/On-Track/Complete	(10)	0
Publica Contract - Net change in Establishment	(67)	Underway/On-Track/Complete	(67)	0
Visitor information centre funding reduction	(27)	Underway/On-Track/Complete	(27)	0
Internal audit days reduction	(20)	Slippage in Savings Delivery	0	20
Planning Appeals Budget	(40)	Underway/On-Track/Complete	(40)	0
Recycling Budget Adjustments	(16)	Underway/On-Track/Complete	(16)	0
Household Waste Budget adjustments	(9)	Underway/On-Track/Complete	(9)	0
Recycling Credits	(90)	Underway/On-Track/Complete	(90)	0
Fees and Charges				
Car Parking Fees (Sunday Charging)	0			0
Other Fees and Charges - Cost Recovery	(186)	Slippage in Savings Delivery	(142)	44
Garden Waste - fee increase	(229)	Underway/On-Track/Complete	(229)	0
	(1,010)		**(920)**	**90**

5.6 The forecast in Table 6a indicates £0.883m of the £1.010m savings already adjusted out of the revenue budget (around 87.4%) will be achieved. £0.127m (12.3%) is off-target and is largely due to under-performance of fees and charges income (Public Conveniences, Land Charges) as outlined earlier in the report. Expenditure savings arising from lower Insurance Premiums have been achieved, although this is below the anticipated level. A reduction in the level of audit days is not likely to take effect until 2024/25 due to notice periods required to make significant changes to the agreement with South West Audit Partnership (SWAP).

5.7 Table 6b provides members with an update on the performance against the Publica and Ubico savings targets (third party contract savings). A number of savings initiatives were identified as part of the 2023/24 budget setting process and were reviewed at Publica and Ubcio shareholder forums. These initiatives required further scoping and planning before they could move into the delivery phase.

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Table 6b – Savings Update

Savings & Transformation Items	2023/24 Original Net Budget (£'000)	2023/24 Forecast Savings (£'000)	2023/24 Variation (£'000)
Savings held 'below the line'		0	0
Publica Savings	(250)	(250)	0
Ubico/ESIP Savings	(250)	(150)	100
Other Corporate Savings		0	0
Additional in-year savings (as per Tracker)		0	0
Item 1			
Item 2			
	(500)	**(400)**	**100**

5.8 The forecast on the identification and delivery of savings against targets indicates a potential shortfall of £0.100m against the Ubico target and should be viewed as indicative at this stage of the year with further updates to CTWG and Cabinet on savings and cost reduction proposals.

5.9 Publica savings proposals against the £0.250m target are broadly in-line with the operating model set out in the Publica Business Plan 2022-2025 document (link to Publica Business Plan). Savings and efficiencies continue to be monitored and challenged through CTWG for robustness in terms of deliverability and the wider business case.

5.10 Savings proposals reviewed to date have been focussed on efficient service delivery and cost reductions including:

- Workforce Planning – one-off savings arising from vacancy management
- Agile Working (reduced business travel costs)

5.11 Ubico savings proposals require further scoping and due diligence given the impact there may be on service delivery. Cost reductions have already been taken from operating a more efficient Garden Waste collection service (reduction of loaders on a small number of rounds with no impact on service quality).

5.12 Members should note the £42k underspend forecast on the Ubico contract sum with a cautious position adopted on savings delivery to avoid risk of double counting.

6. CAPITAL PROGRAMME

6.1 Council approved the Capital Programme for 2023/24 at their meeting on 15 February 2023. Cabinet approved the carry forward of unspent Capital budgets of £1.114m in the Financial Performance Report 2022/23 Outturn report to Cabinet in July 2023. The revised capital programme for 2023/24 is £15.013m. Given the budget profile of some of these schemes there has been a relatively low level of expenditure in the first quarter with a net total spend of £1.731m (£0.140m when the service loan is excluded).

Table 7 – Capital Programme budget reconciliation

Capital Programme Reconciliation	(£'000)
Orignal Budget (Council, 15 February 2023)	13,899
Slippage from 2022/23 (Cabinet, 17 July 2023)	1,114
Adj:	
Adj:	
Adj:	
Latest Budget	**15,013**

Table 8 – Capital Programme Outturn Forecast

Capital Programme	2023/24 OB (£'000)	Slippage From 2022/23 (£'000)	2023/24 LAB (£'000)	2023/24 Actuals to Q3 (£'000)	2023/24 Outturn Forecast (£'000)	2023/24 Outturn Variance (£'000)
Leisure & Communities	1,387	4	1,391	(28)	1,391	0
Housing/Planning and Strategic Housing	4,001	208	4,209	1,763	3,918	(291)
Environment	1,956	173	2,129	(85)	583	(1,546)
Retained & Corporate	0	0	0	0	0	0
ICT, Change and Customer Services	350	65	415	0	100	(315)
UK Rural Prosperity Fund	191	0	191	0	191	0
UK Shared Prosperity Fund Projects	28	0	28	0	28	0
Land, Legal and Property	500	370	870	0	870	0
Transformation and Investment	5,486	294	5,780	81	1,216	(4,564)
TOTAL Capital Programme	**13,899**	**1,114**	**15,013**	**1,731**	**8,297**	**(6,716)**

6.2 As set out in the Financial Performance Report 2022/23 Outturn report to Cabinet in July 2023, slippage of £1.114m from the 2022/23 capital programme has been included in the revised capital programme set out in the table above. The initial outturn forecast for the current year is an underspend of £6.716m with slippage likely of £2.027m.

6.3 A summary of the key activity and variations forecast to date is provided below with Annex B providing a detailed overview of expenditure and explanation for variances against the capital programme.

6.4 The forecast assumes that the Strategic Property Acquisition (included in the summary line Transformation and Investment) will not proceed in the current financial year. With interest rates remaining relatively high, any future acquisition decision will need to be supported by a full business case setting out the wider benefits and financial impact over the immediate and longer-term.

Capital Receipts and Disposals

6.5 The Council received no capital receipts and did not make any asset disposals during the first quarter of 2023/24.

Table 9 – Capital Financing Statement Forecast

Capital Financing Statement	2023/24 OB (£'000)	Slippage From 2022/23 (£'000)	2023/24 LAB (£'000)	2023/24 Outturn Forecast (£'000)	2023/24 Outturn Variance (£'000)
Capital receipts	8,036	433	8,469	6,627	(1,842)
Capital Grants and Contributions	1,576	331	1,907	1,154	(753)
Earmarked Reserves	0	0	0	0	0
Revenue Contribution to Capital Outlay (RCCO)	150	0	150	50	(100)
Community Municipal Investments (CMI)	116	350	466	466	0
Prudential Borrowing	4,021	0	4,021	0	(4,021)
	13,899	**1,114**	**15,013**	**8,297**	**(6,716)**

6.6 The Capital Financing position set out in the table above will be reviewed by the s151 Officer during the year as expenditure forecasts are updated to ensure a balanced use of capital resources and mitigation of current and future interest rates.

Prudential Indicators

6.7 The detailed Non-Treasury Management prudential indicators are included in Annex C with the commentary below providing members with a high-level summary.

6.8 With the lower level of capital expenditure forecast for the financial year, this will reduce the underlying need to borrow. The mid-year Treasury Management report to Audit and Governance Committee will set out the wider impact on the Capital Financing Requirement and other prudential indicators measuring proportionality of capital financing costs to the Council's net revenue stream.

7. RISKS AND UNCERTAINTIES

7.1 The report outlines a number of risks and uncertainties around the wider economic environment. Some further risks are briefly outlined below.

- Assumptions made in the forecast are based on projections for inflation and interest rates. Uncertainty remains around Government policy, volatility of GBP (£) against other currencies, interaction between increased UK interest rates and the level of inflation.
- This report includes initial forecasts for income from fees and charges and this remains a risk to the Council given the impact of higher prices, energy costs on the cost of living, and the impact of recessionary pressures on the economy. This may lead to reduced demand for council services and hence lower income from fees and charges.
- The Council is dependent on a number of key partners (e.g. Ubico, Publica, Freedom Leisure) for the delivery of core Council services and may be more exposed to fluctuations in income and expenditure. Any additional income of expenditure pressures would increase the financial pressure facing the Council and would need to be funded through reserves or savings found elsewhere.

8. CONCLUSIONS

8.1 This monitoring report presents an update on the Council's financial position. As the report sets out, an overspend of £0.448m is forecast for the financial year which. Without mitigating or corrective action this would be financed from the Financial Resilience Reserve at year end which is not considered appropriate given the scale of the financial challenge over the MTFS period.

8.2 The Cabinet Transform Working Group (CTWG) will continue to consider the impact of the forecast outturn and the impact on earmarked reserves as part of their oversight of the savings and transformation programme.

8.3 It is recommended that CTWG review in-year opportunities with Publica and Ubico and provide Cabinet with an update in November on options to mitigate the financial position as currently forecast.

9. FINANCIAL IMPLICATIONS

9.1 The financial implications are set out in this report

10. LEGAL IMPLICATIONS

10.1 Under Part 2 Local Government Act 2003, the Council must, from time to time during the year review the calculations it has used to set its budget. The Council's Chief Financial Officer is required to report to the Council on the robustness of estimates made for the purposes of calculating the annual budget, and on the adequacy of proposed financial reserves. Members must have regard to that report when making decisions about the calculations in connection with which it is made.

11. RISK ASSESSMENT

11.1 Section 7 of this report sets out the financial risks and uncertainties.

12. EQUALITIES IMPACT

12.1 None.

13. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

13.1 Considered within this report.

14. BACKGROUND PAPERS

14.1 None

(END)

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Service Area	Original Budget		Budget		Actual		Under / Over Budget				Comments
	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	
Environmental & Regulatory Services	1,113,820	-628,920	271,589	-148,778	266,784	-117,857	-4,805	30,921	26,116	129,000	Underachievement of Building Control fee income
Business Support Services - Finance, HR, Procurement	2,325,541	-1,205,522	562,379	-128,296	564,830	-139,554	2,451	-11,258	-8,807	0	
ICT, Change & Customer Services	2,436,054	-77,526	575,193	-21,368	579,728	-39,153	4,535	-17,785	-13,250	0	
Assets, Land, Legal & Property	1,357,561	-639,878	371,035	-197,315	389,337	-181,923	18,302	15,392	33,694	90,000	Lower than budgeted land charge income and higher than estimated NNDR charge in relation to Trinity Road Council Offices following valuation.
Pulica Executives and Modernisation	131,136	0	32,537	0	32,505	0	-32	0	-32	0	
Revenues & Housing Support	13,212,034	-12,597,115	279,060	-125,179	489,505	-345,399	210,445	-220,220	-9,775	0	
Environmental Services	10,927,630	-6,119,588	3,537,188	-2,393,328	3,462,033	-2,373,833	-75,155	19,494	-55,661	83,000	Overspend expected due to purchase of household waste bins in Q2 £50k, and underachievement of public convenience fees £54k. Forecast Ubico contract saving (£42k) as at the end of Q.1
Leisure & Communities	1,941,972	-24,021	304,000	-80,499	389,717	-177,241	85,717	-96,742	-11,025	35,000	Payment due for utility risk share to SLM and higher than budgeted sports centre dual use charge.
Planning & Strategic Housing	2,908,344	-961,795	851,850	-297,508	1,042,234	-487,536	190,384	-190,028	356	0	
Democratic Services	1,140,111	-25,905	286,471	-6,476	306,282	-25,000	19,812	-18,524	1,287	0	
Retained Services	3,676,046	-2,482,428	830,790	-617,051	867,749	-790,092	36,959	-173,041	-136,082	231,000	(£200k) overachievement of investment income. £66k underachievement on Investment Property rents. £100k estimate for underachievement on contract savings. £400k estimate for Ubico/Publica 'cost of living' salary inflation. (£134k) underspend on contigency, other non-service income and expenditure.
Cost of Services (Gross)	**41,170,249**	**-24,762,698**	**7,902,091**	**-4,015,798**	**8,390,705**	**-4,677,590**	**488,614**	**-661,792**	**-173,178**		
Cost of Services (Net)		**16,407,551**		**3,886,293**		**3,713,115**				**568,000**	

Service Area	Original Budget		Budget		Actual		Under / Over Budget				Comments
	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	
Minimum Revenue Provision	16,607	0	0	0	0	0	0	0	0	0	
Revenue Contribution to Capital Outlay (RCCO)	200,000	0	0	0	0	0	0	0	0	-100,000	Capital expenditure funded by RCCO est. £100k in 2023/24
Reversal of Depreciation/Amortisation		-1,635,591	0	0	0	0	0	0	0	0	
Transfer (from)/to Reserves		-625,102	0	0	0	0	0	0	0	-20,000	Transformation and Investment
General Government Grants		-3,195,635	0	-588,587	0	-588,587	0	0	0	0	
Council Tax Income		-6,308,796	0	0	0	0	0	0	0	0	
Non Domestic Rates Income and Expenditure		-3,998,000	0	-1,392,265	0	-1,392,265	0	0	0	0	
Deficit		**861,034**	**7,902,091**	**-5,996,650**	**8,390,705**	**-6,658,442**	**488,614**	**-661,792**	**-173,178**	**448,000**	

Environmental & Regulatory Services	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Building Control - Fee Earning Work	189,206	-360,000	45,949	-90,000	46,845	-58,604	896	31,396	32,292	124,000	Building control is retaining market share, however number of apps is down in Q.1. Income is below target due to the current financial climate. With the uncertainty on inflation and interest rates etc., this is likely to continue throughout the financial year. During Q.1 121 applications were recieved compared to 175 for the same period last year.
Building Control - Non Fee Earning Work	60,144	0	14,678	0	14,679	0	1	0	1		
Dangerous Structures	2,500	0	625	0	710	0	85	0	85		
Building Control	**251,850**	**-360,000**	**61,252**	**-90,000**	**62,235**	**-58,604**	**983**	**31,396**	**32,378**		
Emergency Planning	24,904	0	2,122	0	2,121	0	-1	0	-1		
Environment - Service Management and Support Services	108,961	0	27,240	0	25,989	0	-1,251	0	-1,251		
Private Sector Housing - Condition of Dwellings	191	0	0	0	0	0	0	0	0		
Home Energy Conservation	135	0	0	0	0	0	0	0	0		
Licensing	231,751	-213,920	57,312	-39,028	58,646	-45,985	1,334	-6,956	-5,623		
Environmental Protection	214,368	-53,000	52,035	-19,250	51,118	-11,807	-917	7,443	6,526	5,000	£7k under achievement of pollution sampling income
Pollution Control	142,043	0	37,601	0	33,188	0	-4,412	0	-4,412		
Food Safety	137,944	-2,000	33,652	-500	33,463	-662	-188	-161	-350		
Health & Safety At Work	0	0	0	0	24	0	24	0	24		
Statutory Burials	1,591	0	375	0	0	0	-375	0	-375		
Abandoned Vehicles	82	0	0	0	0	-800	0	-800	-800		
Public Protection	**861,970**	**-268,920**	**210,337**	**-58,778**	**204,550**	**-59,253**	**-5,787**	**-475**	**-6,262**		
Environmental & Regulatory Services	**1,113,820**	**-628,920**	**271,589**	**-148,778**	**266,784**	**-117,857**	**-4,805**	**30,921**	**26,116**	**129,000**	

Business Support Services - Finance, HR, Procurement	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
S & S Holding Account	0	0	0	0	-436	-592	-436	-592	-1,028		
Accountancy	438,383	-39,120	107,521	0	102,848	0	-4,673	0	-4,673		
Creditors	119,144	-63,580	28,679	0	28,137	0	-542	0	-542		
Debtors	60,710	-15,480	14,070	0	13,530	0	-540	0	-540		
Insurances	67,856	-53,690	16,964	0	16,965	0	1	0	1		
GO Support and Hosting	63,219	-50,360	15,805	0	10,149	0	-5,656	0	-5,656		
Accountancy	**749,312**	**-222,230**	**183,038**	**0**	**171,193**	**-592**	**-11,846**	**-592**	**-12,437**		
Internal Audit	93,121	-22,217	23,280	0	29,002	0	5,722	0	5,722		
Glos. Counter Fraud Unit	513,181	-513,182	117,445	-128,296	120,696	-138,962	3,251	-10,667	-7,416		
Audit	**606,302**	**-535,399**	**140,725**	**-128,296**	**149,698**	**-138,962**	**8,973**	**-10,667**	**-1,694**		
Human Resources	618,281	-298,760	152,129	0	156,599	0	4,470	0	4,470		
Health & Safety	37,906	0	9,401	0	9,751	0	350	0	350		
Training & Development	141,211	-61,580	34,674	0	33,345	0	-1,328	0	-1,328		
Human Resources	**797,398**	**-360,340**	**196,204**	**0**	**199,695**	**0**	**3,491**	**0**	**3,491**		
Payroll	105,808	-63,750	25,731	0	25,062	0	-669	0	-669		
Payroll	**105,808**	**-63,750**	**25,731**	**0**	**25,062**	**0**	**-669**	**0**	**-669**		
Central Purchasing	66,721	-23,803	16,680	0	19,182	0	2,502	0	2,502		
Procurement	**66,721**	**-23,803**	**16,680**	**0**	**19,182**	**0**	**2,502**	**0**	**2,502**		
Business Support Services - Finance, HR, Procurement	**2,325,541**	**-1,205,522**	**562,379**	**-128,296**	**564,830**	**-139,554**	**2,451**	**-11,258**	**-8,807**	**0**	

ICT, Change & Customer Services	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Business Improvement/Transformation	125,418	0	31,042	0	31,041	0	-1	0	-1		
Business Continuity Planning	22,277	0	5,006	0	5,007	0	2	0	2		
Freedom of Information Act	12,221	0	3,055	0	3,054	0	-1	0	-1		
Street Naming	10,352	-25,000	2,513	-6,250	0	-8,717	-2,513	-2,467	-4,979		
Business Transformation	**170,268**	**-25,000**	**41,615**	**-6,250**	**39,102**	**-8,717**	**-2,513**	**-2,467**	**-4,979**		
Moreton-in-Marsh, Offices	95,605	-29,861	23,882	-9,745	29,376	-14,219	5,495	-4,474	1,021		
FOH - Moreton	116,657	-3,665	28,443	-622	28,469	-62	26	561	586		
Moreton - Stock Trading a/c	0	0	0	0	0	-1,624	0	-1,624	-1,624		
FOH - Trinity Road	624,024	0	155,293	0	155,290	-17	-3	-17	-20		
Customer Services	**836,286**	**-33,526**	**207,618**	**-10,368**	**213,135**	**-15,921**	**5,517**	**-5,553**	**-36**		
ICT	1,318,774	-19,000	298,279	-4,750	299,422	-4,349	1,143	401	1,545		
Application Support	110,726	0	27,682	0	28,069	-10,167	388	-10,167	-9,780		
ICT	**1,429,500**	**-19,000**	**325,960**	**-4,750**	**327,491**	**-14,516**	**1,531**	**-9,766**	**-8,235**		
ICT, Change & Customer Services	**2,436,054**	**-77,526**	**575,193**	**-21,368**	**579,728**	**-39,153**	**4,535**	**-17,785**	**-13,250**	**0**	

Land, Legal & Property	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Trinity Road, Offices	645,376	-368,692	193,458	-128,223	202,850	-127,264	9,393	959	10,352	20,000	Business rates £28.5k more than last year, rateable value has increased from £184,000 to £260,000 resulting in the increase in Business rates.
Moreton-in-Marsh, Offices - Maintenance	34,907	0	8,727	0	8,079	0	-647	0	-647		
Property and Estates Projects	0	0	2,175	0	2,175	0	0	0	0		
Corinium Museum - Maintenance	31,750	0	7,937	0	788	0	-7,150	0	-7,150		No programmed maintenance to date. Part of Building Maintenance Fund (BMF)
Housing Enabling Properties	8,004	-22,481	1,870	-6,916	12,528	-7,109	10,658	-194	10,464		£12k repairs to footpath at Sunground. Any overspend to be funded from the councils overall BMF.
22/24 Ashcroft Road	10,500	0	2,625	0	5,583	0	2,958	0	2,958		
Asset Management	**730,537**	**-391,173**	**216,792**	**-135,139**	**232,003**	**-134,374**	**15,211**	**766**	**15,977**		
Local Land Charges	124,531	-248,705	30,291	-62,176	35,779	-47,550	5,488	14,626	20,114	70,000	Underachieved income. Expected slump in housing market due to mortgage rates will have an impact plus resource issues within service causing delays and loss of customers to the private sector.
Land Charges	**124,531**	**-248,705**	**30,291**	**-62,176**	**35,779**	**-47,550**	**5,488**	**14,626**	**20,114**		
Property Services	502,493	0	123,952	0	121,555	0	-2,397	0	-2,397		
Property Services	**502,493**	**0**	**123,952**	**0**	**121,555**	**0**	**-2,397**	**0**	**-2,397**		
Land, Legal & Property	**1,357,561**	**-639,878**	**371,035**	**-197,315**	**389,337**	**-181,923**	**18,302**	**15,392**	**33,694**	**90,000**	

Publica Executive and Modernisation	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
2020 Vision	0	0	0	0	0	0	0	0	0		
Chief Executive	131,136	0	32,537	0	32,505	0	-32	0	-32		
Managing Director & Support	**131,136**	**0**	**32,537**	**0**	**32,505**	**0**	**-32**	**0**	**-32**		
Chief Execuitve and Modernisation	**131,136**	**0**	**32,537**	**0**	**32,505**	**0**	**-32**	**0**	**-32**	**0**	

Revenues & Housing Support	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Rent Allowances	12,530,146	-12,105,831	140,058	-76,741	158,636	-101,664	18,577	-24,923	-6,346		
Benefits	**12,530,146**	**-12,105,831**	**140,058**	**-76,741**	**158,636**	**-101,664**	**18,577**	**-24,923**	**-6,346**		
Homelessness	115,634	-76,266	28,903	-19,067	70,284	-74,598	41,381	-55,531	-14,150		Higher income from housing benefit. Under accrued in 22/23.
Refugees	19,129	-19,129	4,782	-4,782	139,172	-136,050	134,389	-131,268	3,122		
Homelessness Hostel Accommodation	29,062	-35,500	2,236	-8,875	4,074	-5,781	1,839	3,094	4,933		
Temporary Emergency Accommodation	107,584	-62,856	17,930	-15,714	10,269	-6,346	-7,662	9,368	1,706		
Private Sector Housing Grants	31,855	0	7,964	0	7,980	0	16	0	16		
Housing Management	**303,264**	**-193,751**	**61,815**	**-48,438**	**231,778**	**-222,775**	**169,963**	**-174,337**	**-4,374**		
Council Tax Collection	295,021	-89,000	56,857	0	79,334	-18,246	22,476	-18,246	4,231		
NNDR Collection	66,836	-208,533	16,258	0	16,392	-2,714	134	-2,714	-2,580		
Concessionary Travel	16,767	0	4,072	0	3,198	0	-874	0	-874		
Security Carriers	0	0	0	0	168	0	168	0	168		
Revenues	**378,624**	**-297,533**	**77,187**	**0**	**99,092**	**-20,960**	**21,905**	**-20,960**	**945**		
Revenues & Housing Support	**13,212,034**	**-12,597,115**	**279,060**	**-125,179**	**489,505**	**-345,399**	**210,445**	**-220,220**	**-9,775**	**0**	

Democratic Services	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Committee Services	124,185	0	24,651	0	24,436	0	-215	0	-215		
Corporate Subscriptions	21,980	0	21,980	0	22,139	0	159	0	159		
Committee Services	146,165	0	46,631	0	46,575	0	-56	0	-56		
Press & PR/Communications	101,333	0	25,333	0	12,994	0	-12,339	0	-12,339		
Postal Services	25,036	0	6,259	0	12,489	0	6,230	0	6,230		
Communications	**126,369**	**0**	**31,592**	**0**	**25,483**	**0**	**-6,109**	**0**	**-6,109**		
Registration of Electors	17,000	0	0	0	-0	0	-0	0	-0		
District Elections	0	0	0	0	0	0	0	0	0		
Elections Support/Overheads	152,923	-1,880	38,049	-470	59,954	-22,375	21,905	-21,905	0		
Parliamentary Elections	0	0	0	0	0	0	0	0	0		
Parish Elections	5,000	-2,000	0	-500	0	0	0	500	500		
Police & Crime Commissioner Elections	0	0	0	0	0	0	0	0	0		
Elections	**174,923**	**-3,880**	**38,049**	**-970**	**59,954**	**-22,375**	**21,905**	**-21,405**	**500**		
Democratic Representation and Management	131,537	0	32,879	0	32,942	0	64	0	64		
Councillors Allowances	333,185	0	83,296	0	86,473	0	3,177	0	3,177		
Servicing Council	4,361	0	4,370	0	6,734	0	2,364	0	2,364		
Member Support	**469,083**	**0**	**120,545**	**0**	**126,150**	**0**	**5,605**	**0**	**5,605**		
Printing Services	223,571	-22,025	49,653	-5,506	48,120	-2,625	-1,533	2,881	1,348		
Print & Design	**223,571**	**-22,025**	**49,653**	**-5,506**	**48,120**	**-2,625**	**-1,533**	**2,881**	**1,348**		
Democratic Services	**1,140,111**	**-25,905**	**286,471**	**-6,476**	**306,282**	**-25,000**	**19,812**	**-18,524**	**1,287**	**0**	

Environmental Services	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Car Parks	994,207	-2,990,972	408,494	-691,228	408,344	-700,240	-150	-9,011	-9,161		
Car Parks - Maintenance	35,700	0	8,925	0	15,209	0	6,284	0	6,284		
Car Parks - Tetbury The Chippings	39,075	-54,000	9,769	-13,500	7,934	-11,834	-1,835	1,666	-169		
Car Parks - Chipping Campden	0	0	0	0	7,614	-7,614	7,614	-7,614	-0		
Bourton on the Water Tourism Levy	50,000	-50,000	12,500	-12,939	12,939	-14,169	439	-1,230	-791		
Car Parking	**1,118,982**	**-3,094,972**	**439,688**	**-717,667**	**452,040**	**-733,857**	**12,352**	**-16,189**	**-3,837**		
Cemetery, Crematorium and Churchyards	177,940	-136,830	56,595	-34,208	60,296	-37,261	3,701	-3,054	648	7,000	Ubico - increased cost of weed spraying service in the cemeteries £7k.
Cemeteries - Maintenance	26,520	0	16,520	0	16,657	0	137	0	137		
Waste - Cemeteries	0	0	0	0	0	0	0	0	0		
Animal Control	49,287	-17,505	12,212	-4,376	4,359	-150	-7,853	4,226	-3,627		
Public Conveniences	282,396	-110,055	44,156	-27,288	20,420	-14,582	-23,735	12,705	-11,030	76,000	£13k underachieved on income, offset by duplicate accrual for March 22/23 £16k cleaning contract and £4k one-off Business Rates refund relating to prior period.
Recycling	3,243,553	-949,783	1,037,065	-167,297	1,031,927	-166,466	-5,137	831	-4,306	-38,000	Ubico contract saving due to round remodelling and reduced diesel costs (£38k)
Green Waste	1,359,603	-1,301,000	471,668	-1,297,250	449,650	-1,274,916	-22,018	22,335	317	20,000	Savings have been made for Green Waste due to reducing loaders on the garden waste rounds, however the service is currently experiencing higher repairs, maintenance and hire costs. This is due to an aging fleet that is due to be replaced imminently. This has resulted in a forecast overspend on the service of £20k.
Refuse / Recycling Organic & Food Waste	841,351	-156,000	254,450	-26,000	257,173	-24,520	2,723	1,480	4,203	-6,000	Ubico contract saving due to round remodelling and lower diesel costs (£6k)
Street Cleaning	1,506,055	0	498,504	0	498,503	0	-1	0	-1	-16,000	Ubico have forecast a cost reduction in-year for street cleansing due lower diesel costs.
Household Waste	1,789,781	-23,780	576,944	-5,945	569,827	-6,298	-7,118	-353	-7,471	40,000	A potential overspend of £50k on household waste bins and receptacles is estimated this year. This is due to increased demand, increased costs of materials and longer lead times. This will be reviewed as part of the 24/25 budget setting process. Ubico contract saving due to round remodelling and lower diesel costs (£10k)
Bulky Household Waste	72,537	-78,537	12,089	-19,634	11,775	-28,984	-314	-9,350	-9,664		
Refuse-Stow Fair	11,553	0	4,143	0	4,143	0	0	0	0		
South Cerney Depot, Packers Leaze	105,772	-228,466	18,018	-93,663	10,402	-86,750	-7,616	6,913	-703		
Environmental Services Client	**9,466,348**	**-3,001,956**	**3,002,364**	**-1,675,660**	**2,935,133**	**-1,639,927**	**-67,231**	**35,734**	**-31,497**		

Environmental Services	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Climate Change	119,264	0	39,560	0	36,298	0	-3,262	0	-3,262		
Climate Change	**119,264**	**0**	**39,560**	**0**	**36,298**	**0**	**-3,262**	**0**	**-3,262**		
Land Drainage	122,619	-22,660	30,576	0	26,061	-50	-4,515	-50	-4,565		
Flooding	**122,619**	**-22,660**	**30,576**	**0**	**26,061**	**-50**	**-4,515**	**-50**	**-4,565**		
Environmental Strategy	100,417	0	25,000	0	12,501	0	-12,499	0	-12,499		No expenditure to date on civic pride grants as part of Clean and Green initiative.
Waste & Recycling Policy	**100,417**	**0**	**25,000**	**0**	**12,501**	**0**	**-12,499**	**0**	**-12,499**		
Environmental Services	**10,927,630**	**-6,119,588**	**3,537,188**	**-2,393,328**	**3,462,033**	**-2,373,833**	**-75,155**	**19,494**	**-55,661**	**83,000**	

Leisure & Communities	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Consultation, Policy & Research	98,103	0	25,688	0	25,455	0	-233	0	-233		
Corporate Planning	**98,103**	**0**	**25,688**	**0**	**25,455**	**0**	**-233**	**0**	**-233**		
Corinium Museum	284,621	0	0	0	86	-433	86	-433	-347		
Collection Management	8,102	0	0	0	0	0	0	0	0		
Northleach Resouce Centre	19,953	0	4,125	0	0	0	-4,125	0	-4,125		
Ciren - Centre Management	561,975	0	37,319	0	31,343	0	-5,976	0	-5,976	25,000	Payment due for utility risk share to SLM. Year one of Freedom Leisure Contract fee is £274k in excess of budget, funded from the Council's financial resilience reserve.
Ciren - Dryside Areas	12,021	-24,021	0	-6,005	0	-11,137	0	-5,131	-5,131		
Cirencester Leisure - Maintenance	33,000	0	8,250	0	3,944	0	-4,306	0	-4,306		
C Campden - Centre Management	114,231	0	62,538	0	72,539	0	10,001	0	10,001	10,000	Dual Use payment exceeds budget
Bourton - Centre Management	142,108	0	0	0	0	0	0	0	0		
Bourton - Maintenance	43,000	0	-0	0	0	0	0	0	0		
Leisure Management	**1,219,011**	**-24,021**	**112,232**	**-6,005**	**107,913**	**-11,570**	**-4,319**	**-5,565**	**-9,884**		

Leisure & Communities	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Health Policy	28,426	0	6,909	0	6,435	0	-474	0	-474		
Community Liaison	113,150	0	26,873	0	26,507	0	-366	0	-366		
Youth Participation	128,646	0	32,128	0	32,128		-0	0	-0		
Health Development	56,994	0	11,645	0	58,956	-46,880	47,311	-46,880	431		
Community Welfare Grants	173,019	0	43,232	0	43,232		-0	0	-0		
SPF Community and Place	0	0	0	0	5,217	-5,217	5,217	-5,217	0		
SPF Supporting Local Businesses	0	0	0	0	33,728	-33,728	33,728	-33,728	0		
Community Liaison	**500,235**	**0**	**120,787**	**0**	**206,203**	**-85,825**	**85,416**	**-85,825**	**-409**		
Community Safety (Crime Reduction)	25,203	0	6,189	0	5,688	0	-501	0	-501		
Community Safety	**25,203**	**0**	**6,189**	**0**	**5,688**	**0**	**-501**	**0**	**-501**		
Tourism Strategy and Promotion	16,376	0	4,094	0	4,095	0	1	0	1		
Partnership Grants	27,000	0	21,000	0	21,000	0	0	0	0		
Cotswold Tourism Partnership	56,044	0	14,011	-63,199	14,658	-63,846	647	-647	-0		
Tourism Discover England Fund - Project	0	0	0	-11,295	4,705	-16,000	4,705	-4,705	0		
Tourism Policy	**99,420**	**0**	**39,105**	**-74,494**	**44,458**	**-79,846**	**5,353**	**-5,352**	**1**		
Leisure & Communities	**1,941,972**	**-24,021**	**304,000**	**-80,499**	**389,717**	**-177,241**	**85,717**	**-96,742**	**-11,025**	**35,000**	

Planning & Strategic Housing	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Development Control - Applications	980,451	-894,877	243,124	-223,719	254,462	-230,307	11,339	-6,588	4,750		
Development Control - Appeals	94,119	0	35,592	0	35,593	0	1	0	1		
Development Control - Enforcement	209,750	0	51,935	0	51,936	0	1	0	1		
Development Advice	373,591	0	92,627	0	92,628	0	1	0	1		
Planning Advice For Land Charges	12,714	0	3,128	0	3,129	0	1	0	1		
Planning - Section 106 Agreements	0	0	0	0	62,062	-62,062	62,062	-62,062	0		
Development Services Holding Account	0	0	0	0	0	0	0	0	0		
Development Management	**1,670,625**	**-894,877**	**426,406**	**-223,719**	**499,810**	**-292,369**	**73,404**	**-68,650**	**4,754**		
Heritage & Design	246,394	-25,818	78,644	-6,455	76,093	-417	-2,551	6,037	3,486		
Heritage & Conservation	**246,394**	**-25,818**	**78,644**	**-6,455**	**76,093**	**-417**	**-2,551**	**6,037**	**3,486**		
Housing Advice	308,614	0	76,779	0	73,254	0	-3,525	0	-3,525		
Housing Strategy	166,843	0	42,090	0	35,592	0	-6,498	0	-6,498		
Housing Partnerships	27,506	0	6,787	0	6,786	0	-1	0	-1		
Strategic Housing	**502,963**	**0**	**125,656**	**0**	**115,632**	**0**	**-10,024**	**0**	**-10,024**		
Community Infrastructure Levy	72,824	-40,000	18,206	-24,655	144,959	-151,409	126,753	-126,754	-0		
Local Development Framework	374,723	-100	92,845	-25	89,430	-15	-3,415	10	-3,405		
Sc111 Habitat Regulation Authority	0	0	0	-42,404	0	-42,404	0	0	0		
Fwd Plan work for Dev Con	18,606	0	4,598	0	4,599	0	1	0	1		
Local Development Framework Reserve	0	0	96,754	0	96,754	0	-0	0	-0		
Planning - Service Management and Support Services	22,209	-1,000	8,739	-250	14,956	-922	6,217	-672	5,545		
Planning Policy	**488,362**	**-41,100**	**221,143**	**-67,334**	**350,698**	**-194,750**	**129,556**	**-127,416**	**2,140**		
Planning & Strategic Housing	**2,908,344**	**-961,795**	**851,850**	**-297,508**	**1,042,234**	**-487,536**	**190,384**	**-190,028**	**356**	**0**	

Retained Services	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Interest Payable and Similar Charges	99,485	0	0	0	1,083	0	1,083	0	1,083		
Interest and Investment Income	13,000	-830,316	3,250	-179,711	15,777	-310,267	12,527	-130,556	-118,029	-200,000	Investment income forecast to be overachieved by £200k higher interest rates and more liquidity than estimated. Will transfer excess income to Treasury Management Reserve.
Commercial Properties - General	15,468	-160	3,855	-40	507	0	-3,348	40	-3,308		
Old Memorial Hospital (inc Cottages)	17,887	-7,265	2,668	-2,417	3,425	-2,417	757	0	758		
Dyer Street	0	-120,000	0	-30,000	0	-30,000	0	0	0		
Old Station	21,571	0	3,642	0	29,047	0	25,405	0	25,405		
Brewery Court, Arts & Niccol Centre	294	-56,142	0	-13,961	2,800	-16,503	2,800	-2,542	258		
GCC Depot, Chesterton Lane	1,053	-2,015	0	-264	0	-23	0	241	241		
Abberley House/44 Black Jack St.	30,580	-87,339	5,831	-26,117	-912	-28,914	-6,744	-2,797	-9,540		
Compton House	1,500	-14,626	375	-4,875	0	-4,875	-375	0	-375		
1st Floor Church Rms, Bourton-on-the-Water	120	-4,570	0	-1,513	0	-1,483	0	30	30		
Bourton VIC	1,567	-8,000	0	-2,667	0	-4,000	0	-1,333	-1,333		
Wilkinson's West Bromich	6,006	-89,635	1,219	-44,534	0	-41,750	-1,219	2,784	1,565	66,000	Estimated income shortfall for Investment Property rent.
Superdrug Hereford	652	-62,155	0	-30,750	0	-30,750	0	0	0		
Tesco's Seaford	1,098	-93,180	0	-46,040	342	-45,790	342	250	593		
27 -27A Dyer Street	21,421	-128,777	5,000	-52,451	3,295	-52,451	-1,705	0	-1,705		
Discretionary Pension Payments	1,632,916	0	248,500	0	248,500	0	0	0	0		
Corporate I&E	**1,864,618**	**-1,504,180**	**274,339**	**-435,339**	**303,863**	**-569,222**	**29,524**	**-133,883**	**-104,359**		

Retained Services	For 01/04/2023 to 30/06/2023										
	Original Budget		Budget		Actual		Under / Over Budget				
Cost Centre Description	Expenditure	Income	Expenditure	Income	Expenditure	Income	Expenditure	Income	Variance	Forecast Variance	Comments
Corporate Finance	115,123	0	75,213	0	133,462	-59,500	58,249	-59,500	-1,251		
External Audit Fees	96,368	0	0	0	0	0	0	0	0		
Bank Charges	61,065	0	15,266	0	23,056	0	7,790	0	7,790		
Savings and Growth Items	319,014	-722,877	27,000	-5,500	28,947	0	1,947	5,500	7,447	365,000	£400k est. for 2023/24 'cost of living' pay inflation across Ubico/Publica contracts. £100k savings from Ubico unlikely to be achieved in 2023/24. (£134k) underspend on contingency budget.
Publica Group	37,972	0	143,959	-134,466	143,959	-134,468	0	-2	-2		
Strategic Directors	661,417	0	164,884	0	161,700	0	-3,184	0	-3,184		
Legal	394,107	-166,982	97,689	-41,746	66,843	-25,702	-30,847	16,045	-14,802		
CDC Counter Fraud Unit	104,124	-88,389	26,881	0	0	-1,200	-26,881	-1,200	-28,081		
Corporate Management	**1,789,190**	**-978,248**	**550,892**	**-181,712**	**557,967**	**-220,870**	**7,075**	**-39,158**	**-32,083**		
Corona Virus	22,238	0	5,560	0	5,806	0	247	0	247		
Contain Outbreak Management Fund	0	0	0	0	113	0	113	0	113		
COMF - Licencing	0	0	0	0	0	0	0	0	0		
COMF - DHSC	0	0	0	0	0	0	0	0	0		
Coivid	**22,238**	**0**	**5,560**	**0**	**5,919**	**0**	**360**	**0**	**360**		
Retained Services	**3,676,046**	**-2,482,428**	**830,790**	**-617,051**	**867,749**	**-790,092**	**36,959**	**-173,041**	**-136,082**	**231,000**	

Annex B - Capital Programme 2023/24 - Q.1

Capital Programme by Service Area	2023/24 Budget [Incl. 22/23 slippage] (£'000)	2023/24 Actuals to Q1 (£'000)	2023/24 Variance to Q1 (£'000)	2023/24 Committed Expenditure (£'000)	2023/24 Forecast Out-Turn (£'000)	Commentary
Leisure and Communities						
Investment in Leisure Centres	1,200	0	(1,200)	1,200	1,200	Scope of works progressing with the Councils leisure contractor, Freedom Leisure.
CLC Pool Works	110	0	(110)	110	110	This scheme is to address flaking paint from the steel structural support in the Cirencester Leisure Centre pool area. Property services are working with the Councils leisure contractor, Freedom Leisure. Due to the specialist nature of the work involved and materials required, currently scoping for a potential contractor following unsuccessful procurement process. These works are likely to be aligned with the timelines of Freedom Leisure's proposed capital works.
Government funded decarbonisation	27	(27)	(54)	27	27	Final payment due in Q.2 - Snagging and system performance being reviewed with installation contractor.
Crowdfund Cotswold	54	0	(54)	0	54	The spring round was light on projects, with only three projects, of which two sought support from the Council. These are still under consideration, into Q.2. The autumn round launches in early July, and looks like there will be more projects coming forward.

Capital Programme by Service Area	2023/24 Budget [Incl. 22/23 slippage] (£'000)	2023/24 Actuals to Q1 (£'000)	2023/24 Variance to Q1 (£'000)	2023/24 Committed Expenditure (£'000)	2023/24 Forecast Out-Turn (£'000)	Commentary
Housing/Planning and Strategic Housing						
Private Sector Housing Renewal Grant (DFG)	908	172	(736)	500	908	There are 106 live cases, 38 of which have been approved with committed expenditure of £500k. It is anticipated that the majority of the remaining 68 cases are likely to be completed this financial year resulting in a further £1.1m of expenditure. With another 100 referrals expected to be received in the next nine months it is likely that the annual expenditure will exceed £1.3m. Further funding will be requested from the BetterCare fund held by Gloucestershire County Council to meet any overspend.
Affordable Housing - Davies Road MiM (S106)	581	0	(581)	290	290	50% 'Start on Site' tranche grant will be transferred to Cottsway Housing Association in Q.2. The following 50% will be transferred upon notification of completion which is currently expected to be during Q.2 2024/25.
Cottsway Housing Association Loan	2,600	1,591	(1,009)	1,009	2,600	Transfer of part of the agreed loan sum completed in June 2023.
Bromford Joint Venture Partnership	120	0	(120)	120	120	The Council and Bromford Housing have entered into a Collaboration Agreement to deliver the Down Ampney housing development. There have been delays due to drainage concerns, however now progressing with planning application due to be submitted in Q.2.

Capital Programme by Service Area	2023/24 Budget [Incl. 22/23 slippage] (£'000)	2023/24 Actuals to Q1 (£'000)	2023/24 Variance to Q1 (£'000)	2023/24 Committed Expenditure (£'000)	2023/24 Forecast Out-Turn (£'000)	Commentary
Environment						
Waste & Recycling receptacles	55	0	(55)	55	55	Rolling budget for the purchase of waste receptacles due to growth in properties or replacements. This budget will be utilised in full during this financial year.
Litter Bin Replacement	10	0	(10)	0	0	Review of service currently underway. Expenditure not likely until 2024/25.
Provision for financing of Ubico Vehicles	1,646	(85)	(1,731)	1,646	253	Two replacement vehicles for the Street Cleansing fleet are due for delivery in July [£89k]. A further three vehicles are on order, two for Street Cleansing [£124k] and one bin delivery vehicle [£40k], delivery is expected during September/October. The budget will be committed in full by the end of this financial year, however due to lead times, it's unlikely that any further expenditure will go through before the end of the year.
Electric Vehicle Charging Points	200	0	(200)	91	91	16 EVCP's are scheduled for installation, 8 at Rissington Road car park and 8 at Trinity Road offices. There will be further installation of 4 EVCPs at Trinity Road specifically for service vehicles. All works are due to commence during Q.2 with completion by the end of Q.3.
Car Park enforcement - vehicle purchase	45	0	(45)	0	45	A vehicle is currently being leased and the purchase of an electric vehicle has been put on hold until EVCPs are installed within the parking facilities at Trinity Road.
Public Toilets - Card Payment (bc)	50	0	(50)	16	16	A purchase order has been placed for installation of card readers at the following public toilet locations within the district: Stow Square, Maugersbury Road [Stow], Forum, Brewery Court and London Road [Cirencester], Bibury, Moreton-in-Marsh and Fairford. Installation is scheduled to take place during the course of Q.2.
Changing Places Toilets	123	0	(123)	93	123	Funding allocated to the Council from DLUCH to install four accessible 'Changing Places' toilets across the district for people with severe disabilities. Works have been completed at Cotswold Farm Park. Works at Abbey Grounds, Cirencester are almost complete. The other two 'Changing Places' projects at Birdland and Cotswold Country Park and Beach are expected to complete by the end of the financial year.

Capital Programme by Service Area	2023/24 Budget [Incl. 22/23 slippage] (£'000)	2023/24 Actuals to Q1 (£'000)	2023/24 Variance to Q1 (£'000)	2023/24 Committed Expenditure (£'000)	2023/24 Forecast Out-Turn (£'000)	Commentary
Retained and Corporate:						
ICT, Change and Customer Services						
ICT Capital	215	0	(215)	45	100	Networking equipment that was ordered in January 2022 has now been received following delays due to world-wide computer chip shortages. Expenditure will go through in Q.2. There is committed expenditure for replacement servers for disaster recovery and the ongoing laptop replacement programme.
Planning Documents and Scanning Solution	200	0	(200)	0	0	Awaiting an options paper for the replacement/upgrade of the IDOX system.
UK Rural Prosperity Fund Projects	191	0	(191)	191	191	Funding is phased over two years £191k in 2023/24 and £573k in 2024/25. A report went to Cabinet 17 July 2023 with detail on the proposals of how this funding will be spent. Over the two years, the funding is allocated £410k capital grants to businesses and £354k for community related capital projects. It is expected that the first spend against this funding will commence in September 2023. Any underspend at the end of each financial year will need to be returned to government.
UK Shared Prosperity Fund Projects	28	0	(28)	28	28	Funding has been allocated to supporting the town centres, community and neighbourhood infrastructure, improving green spaces, active travel and impactful volunteering. Full details can be found in the Cabinet report of 13th March 2023. Expenditure will start during Q.2. All funding has to spent by the end of this financial year.
Land, Legal and Property						
Trinity Road Carbon Efficiency Works (Council March 2022)	370	0	(370)	210	370	Solar PV was approved at Council 19th July 2023. Works will take place in Q2-Q3 2023/24. £210k will be committed in Q2 once final details agreed and order placed.
Asset Management Strategy	500	0	(500)	50	500	Asset Management Strategy [AMS] currently being procured. The outcome of this exercise will inform where works are required. Some of this funding is likely to be allocated to structural repairs at the Old Station, cost estimate £200K but awaiting tenders. Report with options will go to October Cabinet. Works not likely to commence until Q.4 at the earliest.

Capital Programme by Service Area	2023/24 Budget [Incl. 22/23 slippage] (£'000)	2023/24 Actuals to Q1 (£'000)	2023/24 Variance to Q1 (£'000)	2023/24 Committed Expenditure (£'000)	2023/24 Forecast Out-Turn (£'000)	Commentary
Transformation and Investment						
Tetbury Homeless Property (Cabinet May 2022)	294	0	(294)	16	90	Purchase order placed with contractor to carry out laundry room refurbishment on the ground floor of the annex at Ridgeway House. Works due to commence in Q.2.
Trinity Road Agile Working (Council March 2022) [*Includes Trinity Road Roof Repairs*]	1,126	81	(1,045)	328	1,126	The refurbishment of the Council offices is 50% complete, remaining areas are those beneath the glazed roofs in both atria and the bistro. Detailed planning for staff moves to the east side of the building are underway. A programme of works for completion of the roof works has been received and this has been incorporated into the agile rollout. Roof works and agile rollout currently on track to complete by the end of the financial year.
Strategic Property Acquisition	4,360	0	(4,360)	0	0	It is currently assumed that this acquisition will not proceed in the current financial year.
	15,013	**1,732**	**(13,281)**	**6,025**	**8,297**	

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ANNEX C
NON-TREASURY MANAGEMET PRUDENTIAL INDICATORS

The Council measures and manages its capital expenditure, borrowing and commercial and service investments with reference to the following indicators. It is now a requirement of the CIPFA Prudential Code that these are reported on a quarterly basis.

Capital Expenditure

Cotswold District Council has undertaken and is planning capital expenditure as summarised below

Capital Expenditure	2022/23 actual (£)	2023/24 forecast (£)	2024/25 budget (£)	2025/26 budget (£)
General Fund services	2,969,737	5,697,000	2,318,000	1,277,000
Capital investments	1,591,000	2,600,000	0	0

The main General Fund capital projects to date have included expenditure on Disabled Facilities Grants. The Council also incurred £1.591m of capital expenditure in the form of a service loan provided to Cottsway Housing Association.

Capital Financing Requirement

The Council's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with Minimum Revenue Provision (MRP) and capital receipts used to replace debt.

Capital Financing Requirement (CFR)	31/03/2023 actual (£)	31/03/2024 forecast (£)	31/03/2025 budget (£)	31/03/2026 budget (£)
General Fund services	20,211	400,000	2,900,000	2,800,000
Capital investments	0	0	0	0
TOTAL CFR	**20,211**	**400,000**	**2,900,000**	**2,800,000**

Gross Debt and the Capital Financing Requirement

Statutory guidance is that debt should remain below the capital financing requirement, except in the short term. The Council has complied and expects to continue to comply with this requirement in the medium term as is shown below.

Gross Debt and CFR	31/03/2023 actual (£)	31/03/2024 forecast (£)	31/03/2025 budget (£)	31/03/2026 budget (£)	Debt at 30.6.2023 (£)
Debt (incl. PFI & leases)	450,757	2,900,000	2,800,000	2,600,000	450,757
Capital Financing Requirement	20,211	2,900,000	2,800,000	2,700,000	

ANNEX C
NON-TREASURY MANAGEMET PRUDENTIAL INDICATORS

COTSWOLD DISTRICT COUNCIL

Debt and the Authorised Limit and Operational Boundary

The Council is legally obliged to set an affordable borrowing limit (also termed the Authorised Limit for external debt) each year. In line with statutory guidance, a lower "operational boundary" is also set as a warning level should debt approach the limit.

Debt, Authorised Limit and Operational Boundary	Maximum Debt Q1 2023/24 (£)	Debt as at 30/06/2023 (£)	2023/24 Authorised Limit (£)	2023/24 Operational Boundary (£)	Complied? Yes/No
Borrowing	10,000,000	450,757	10,000,000	10,000,000	Yes
PFI and Finance Leases	0	0	0	0	Yes
TOTAL Debt	**10,000,000**	**450,757**	**10,000,000**	**10,000,000**	

Since the operational boundary is a management tool for in-year monitoring it is not significant if the boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure.

Net Income from Commercial and Service Investments to Net Revenue Stream

The Council's income from commercial and service investments as a proportion of its net revenue stream has been and is expected to be as indicated below.

	2022/23 actual (£)	2023/24 forecast (£)	2024/25 budget (£)	2025/26 budget (£)
Total net income from service and commercial investments	507,019	494,000	590,000	600,000
Proportion of net revenue stream	4.02%	3.68%	4.34%	5.39%

The 202324 forecast is lower than that set out in the 2023/24 Capital Strategy due to the £66k income shortfall forecast on commercial property income.

ANNEX C
NON-TREASURY MANAGEMET PRUDENTIAL INDICATORS

COTSWOLD DISTRICT COUNCIL

Proportion of Financing Costs to Net Revenue Stream

Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue.

The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

	2022/23 actual (£)	2023/24 forecast (£)	2024/25 budget (£)	2025/26 budget (£)
Financing costs (£)	6,030	115,000	251,000	257,000
Proportion of net revenue stream	0.05%	0.85%	1.84%	2.31%

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COTSWOLD DISTRICT COUNCIL

CABINET – 12th September 2023

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

Note: Further details regarding the decisions are available in the relevant Decision Notices.

Cabinet Member	Meeting Date	Subject	Decision(s)
Cabinet Member for Planning and Regulatory Services – Councillor Juliet Layton	16th August 2023	Neighbourhood Planning: Regulation 15 Decision for the Down Ampney Neighbourhood Development Plan	The Cabinet Member considered the recommendations of the officer and agreed to the officer's recommendations that; 1) That the submitted documents meet the requirement of Regulation 15 of the Neighbourhood Planning Regulations 2012; 2) Consequently, the Council will launch the statutory 'Regulation 16' publicity period for the standard six week period.
Deputy Leader and Cabinet Member for Finance – Councillor Mike Evemy	18th August 2023	Application for a Section 13A Council Tax Discount	The Deputy Leader considered the recommendations of the officer and the application for Discretionary Council Tax discount submitted under Section 13A of the Local Government Finance Act 1992, as amended, and refused for reasons given within the report.

(END)

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