



Wednesday, 27 August 2025

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### CABINET

A meeting of the Cabinet will be held in the Council Chamber - Council Offices, Trinity Road, Cirencester, GL7 1PX on **Thursday, 4 September 2025 at 6.00 pm.**

A handwritten signature in black ink, appearing to read 'J Portman'.

Jane Portman  
Interim Chief Executive

To: Members of the Cabinet

(Councillors Mike Every, Juliet Layton, Patrick Coleman, Andrea Pellegram, Claire Bloomer, Paul Hodgkinson, Mike McKeown and Tristan Wilkinson)

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**

To receive any apologies for absence. The quorum for Cabinet is 3 members.

2. **Declarations of Interest**

To receive any declarations of interest from Members relating to items to be considered at the meeting.

3. **Minutes** (Pages 7 - 24)

To approve the minutes of the previous meeting of Cabinet held 10 July 2025.

4. **Leader's Announcements**

To receive any announcements from the Leader of the Council.

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

There were no decisions taken by the Leader and/or Individual Cabinet Members since the agenda for Cabinet 10 July 2025 was published.

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

To receive any recommendations from the Overview and Scrutiny Committee and to consider any matters raised by the Audit and Governance Committee.

9. **Preventing Homelessness Strategy 2025-2030** (Pages 25 - 54)

Purpose

To present a new Preventing Homelessness Strategy which will assist the Council to deliver its statutory duties towards those households facing homelessness.

Recommendation(s)

That Cabinet resolves to:

1. Approve the implementation of the Preventing Homelessness Strategy 2025-2030 with immediate effect.

10. **Private Sector Housing Civil Penalties Policy and HMO Amenity Standards**  
(Pages 55 - 112)

Purpose

To review and renew the Civil Penalties Enforcement Policy and the HMO Amenity Standards policy.

Recommendation(s)

That Cabinet resolves to:

1. Approve the Policy for Civil Penalties under the Housing and Planning Act

2016 and The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.

2. Approve the HMO Amenity Standards Policy
3. Delegate authority for decisions on the issue of Civil Penalties and the issuing of the Civil Penalties to the Business Manager of Environmental, Welfare and Revenue Service, in consultation with the Head of Legal Services.

11. **Corporate Plan 2025-2028 refresh** (Pages 113 - 144)

Purpose

To seek Cabinet's endorsement of a refreshed Corporate Plan for the period 2025 through to 2028.

While the extant Corporate Plan was agreed last year, there have been significant changes nationally and locally which are reflected in the refreshed plan.

Recommendation (s)

That Cabinet resolves to:

1. Review the appended Corporate Plan 2024-2028 and agree any modifications
2. Subject to modifications, agree to recommend to Full Council that the Plan be adopted.
3. Delegate authority to the Chief Executive Officer, in consultation with Leader, to finalise the design.

12. **Service Performance Report 2025-26 Quarter 1** (Pages 145 - 218)

Purpose

To provide an update on progress on the Council's priorities and service performance for Q1 2025-26 (April-June 2025).

Recommendation(s)

That Cabinet resolves to:

1. Note overall progress on the Council priorities and service performance for Q1 2025-26 (April-June 2025).

13. **People and Culture Strategy** (Pages 219 - 282)

Purpose

To approve the People & Culture Strategy attached at Annex A and accompanying year 1 implementation plan at Annex B.

Recommendation(s)

1. That Cabinet resolves to:
2. Approve the People & Culture Strategy as detailed in Annex A



Approve the four core workforce values:

- We put our **communities first**: their priorities are our priorities
- We are **one team**: working for our residents and businesses
- We are **business focussed**: ensuring efficiency, effectiveness and good value for money
- We are **set up for success**: to deliver against our corporate priorities

3. Approve the year 1 implementation plan as detailed in Annex B (September 2025 – August 2026)
4. Note the Internal Communications & Engagement Strategy as detailed in Annex C

14. **Financial Performance Report 2025-26 Quarter 1** (Pages 283 - 318)

Purpose

To set out the first budget monitoring position for the 2025/26 financial year.

Recommendation(s)

That Cabinet resolves to:

1. Review and notes the financial position set out in this report.
2. Endorse the approach to financial management for 2025/26 as set out in paragraph 4.8 of the report.
3. Endorse the principle to transfer any additional year-end surplus to the Transformation and Capacity Building earmarked reserves, as set out in paragraphs 4.10 to 4.11 of the report.
4. Endorse the principle to transfer 50% of any year-end Planning Fee income (over and above the budgeted level) to the Planning Appeals earmarked reserve, as set out in paragraph 4.22 of the report.

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Cabinet  
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**COTSWOLD**  
District Council

## **Minutes of a meeting of Cabinet held on Thursday, 10 July 2025**

### Members present:

Mike Evemy	Juliet Layton
Patrick Coleman	Paul Hodgkinson
Andrea Pellegram	Tristan Wilkinson

### Officers present:

Matthew Britton, Principal Planning Policy Officer	Gemma Moreing, Business Information Lead
Angela Claridge, Director of Governance and Development (Monitoring Officer)	Jane Portman, Interim CEO
Julia Gibson, Democratic Services Officer	David Stanley, Deputy Chief Executive and Chief Finance Officer
Paul Lankester, Principal Environmental Health Officer	Jo Symons, Head of Planning Policy and Infrastructure
Geraldine LeCointe, Assistant Director - Planning Services	Joseph Walker, Head of Economic Development and Communities
Nickie Mackenzie-Daste, Senior Democratic Services Officer	Andrew Brown, Head of Democratic and Electoral Services

### Observers:

Councillor Gina Blomefield

## **101 Apologies**

Apologies were received from Councillor Mike McKeown and Councillor Claire Bloomer.

## **102 Declarations of Interest**

Councillor Pellegram declared a potential interest in item 14 as the owner of a non-licensable HMO. After due consideration of the matter, the Monitoring Officer confirmed that Councillor Pellegram had no interest to declare in respect of that item and could therefore take part in the decision.

There were therefore no declarations of interest from Members.

### **103 Leader's Announcements**

The Leader noted that the agenda was substantial due to the absence of meetings in June and August.

The Leader formally welcomed Jane Portman, the newly appointed Interim Chief Executive Officer, to her first meeting of Cabinet at Cotswold District Council.

The Leader noted, prior to discussion of the minutes, the recent passing of Alan McQuillan, a 102-year-old D-Day veteran from Kemble who had attended the VE celebrations in May. All those present were invited to stand for a minute's silence in his memory.

### **104 Minutes**

The purpose of this item was to consider the minutes of the meeting of Cabinet held on 8 May 2025.

There were no amendments to the minutes

Approval of the minutes was proposed by Councillor Every, Leader of the Council and seconded by Councillor Layton, Cabinet Member for Housing and Planning.

The proposal was put to the vote and agreed by Cabinet.

Voting record:

4 For, 0 Against, 2 Abstentions.

<b>Approval of minutes of Cabinet 8 May 2025 (Resolution)</b>		
RESOLVED that the minutes of the Cabinet meeting of the 8 May 2025 be APPROVED as a correct record.		
For	Mike Every, Paul Hodgkinson, Juliet Layton and Tristan Wilkinson	4
Against	None	0
Conflict Of Interests	None	0
Abstain	Patrick Coleman and Andrea Pellegram	2
<b>Carried</b>		

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### **105 Public Questions**

No public questions were received.

### **106 Member Questions**

No member questions were received.

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

One Cabinet Member decision taken since the agenda for Cabinet on 10 July was published and was reported to cabinet members.

### Cabinet Member Delegated Decision 1.

Councillor Clare Bloomer, Cabinet Member for Communities participated in a decision meeting on 23 May 2025 regarding a response to the British Telecommunications consultation on the removal of payphones from 16 locations across Cotswold District, in the light of consultation responses submitted to the Council.

The Cabinet Member for Communities considered the recommendations within the report, noted that the consultation had followed due process and resolved to:

1. Agree to the Council response for each affected kiosk
2. Agree to encourage British Telecommunications Ltd to keep open the offer of community adoption for telephone kiosks retained after the conclusion of the consultation process.

The decision was effective on 6 June 2025.

RESOLVED: Cabinet NOTED the decision.

## **108 Issue(s) Arising from Overview and Scrutiny and/or Audit and Governance**

The Chair welcomed Councillor Gina Blomefield, Chair of the Overview and Scrutiny Committee, and proposed that the Committee's recommendations be considered at the relevant points during consideration of the appropriate agenda items. Councillor Blomefield agreed to this approach.

## **109 Achieving Corporate Net Zero**

The purpose of the report was to recommend the creation of a Corporate Climate Change Board and note the actions to address the emissions performance gap.

The Leader introduced the item, noting that both Councillor Mike McKeown, Cabinet Member for Climate Change and Digital, and Olivia McGregor, Climate Change & Carbon Reduction Lead, were unable to attend as originally planned. The Leader highlighted significant progress made on climate action, including a national rise of over 90 places in the latest scorecard, moving Cotswold District Council into the top six among all district councils. The improvements were particularly notable in areas such as food waste, transport, and biodiversity.

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The Leader emphasised the importance of continued efforts to meet the 2030 CO<sub>2</sub> reduction targets, particularly in addressing emissions from the waste fleet and council buildings. Programmes such as Cotswold Home Solar and EV charger deployment were acknowledged for their wider community benefits.

Cabinet commended the significant progress made on climate action, highlighting the rapid improvement in the Council's national scorecard ranking. Councillors praised Councillor Mike McKeown for his leadership and commitment, noting the creation of the Corporate Climate Board as a positive step forward. It was acknowledged that while progress had been impressive, continued focus and effort were essential, particularly in addressing emissions from the waste fleet and council buildings.

Councillors recognised the importance of maintaining momentum, avoiding complacency, and striving for further improvements. The impact of climate change was emphasised through recent extreme weather events, reinforcing the urgency of local action. The dedication of officers, particularly Olivia McGregor, was acknowledged, and the value of collaborative work across Cabinet and departments was highlighted. The proposed Climate Board was welcomed as a focused and capable group to embed climate action across all workstreams.

Cabinet was asked to approve the creation of a Corporate Climate Board to support accountability and drive continued progress.

The recommendations were proposed by Councillor Every and seconded by Councillor Wilkinson

The recommendations were put to the vote and agreed by Cabinet.

Voting record

6 For, 0 Against, 0 Abstentions.

<b>To recommend the creation of a Corporate Climate Change Board and note the actions to address the emissions performance gap (Resolution)</b>		
RESOLVED that Cabinet: 1. NOTED the position as set out in the report (Annex A) and the actions to close the emissions performance gap. 2. AGREED the creation of a Corporate Climate Change Board to provide accountability for an emission reduction programme.		
For	Patrick Coleman, Mike Every, Paul Hodgkinson, Juliet Layton, Andrea Pellegram and Tristan Wilkinson	6
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

## **110 Creative Cotswold's Action Plan - Culture Strategy**

The purpose of the report was to present Creative Cotswolds to Cabinet for approval.

Councillor Paul Hodgkinson introduced the Creative Cotswolds action plan, aimed at celebrating and strengthening the district's rich cultural sector. The plan, adapted from an earlier full strategy due to anticipated Local Government Reorganisation (LGR), focused on practical steps to promote collaboration among local cultural organisations, including the Corinium Museum, Barn Theatre, Cidermill Theatre, Longborough Opera, and festivals such as the Phoenix Festival in Cirencester.

The plan proposed regular coordination meetings, cross-promotion of events, improved online visibility using the hashtag #CreativeCotswolds, and the inclusion of cultural listings on cotswolds.com. A new permanent exhibition space at the Bingham Library was cited as early progress.

Members expressed strong support for the Creative Cotswolds Action Plan, noting the district's wide-ranging cultural offerings, from professional theatres like Longborough Opera to smaller venues such as the Sundial Theatre and local pubs hosting live music and comedy. Specific examples mentioned included exhibitions by local artist Laurie Plant at the Bingham Gallery, and cultural events at Cotswold Lakes and local breweries.

The importance of linking culture with local economic and tourism development was highlighted, with councillors recognising the potential for mutual benefit to businesses and community wellbeing. The appointment of a dedicated Leisure and Culture Manager and support officer was welcomed as a positive step to deliver the plan. The crossover between culture, business, and wellbeing was seen as a key strength of the initiative. Officers and councillors were thanked for their work on the project.

The recommendation was proposed by Councillor Paul Hodgkinson and seconded by Councillor Juliet Layton.

The recommendations were put to the vote and agreed by Cabinet.

Voting record:

6 For, 0 Against, 0 Abstentions.

<b>Adoption of 'Creative Cotswold's' strategy as the Council's approach to supporting the cultural sector (Resolution)</b>
RESOLVED that Cabinet: APPROVED the adoption of 'Creative Cotswold's' strategy as the Council's approach to supporting the cultural sector.

For	Patrick Coleman, Mike Evemy, Paul Hodgkinson, Juliet Layton, Andrea Pellegram and Tristan Wilkinson	6
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

## **111 LGA Corporate Peer Challenge Progress Review**

The purpose of the report was to consider the Local Government Association (LGA) Corporate Peer Challenge Progress Report 2024.

Councillor Mike Evemy introduced the report which was for noting.

Cabinet considered the follow-up report from the Local Government Association (LGA) Corporate Peer Challenge review, which took place in November 2024, as a follow-up to the original LGA Peer Challenge conducted in October 2022. It was noted that the follow-up had been delayed to allow assessment of changes made after the first phase of the Publica transition to be taken into account. The report was broadly positive, recognising significant progress made by the Council in response to earlier recommendations; particularly in strengthening governance arrangements and enhancing the role and effectiveness of the Overview and Scrutiny Committee, under the leadership of the current Chair.

It was noted that the peer team also reviewed financial governance during the transition, led by the former portfolio holder, Councillor Mike Evemy, and the Deputy Chief Executive, and provided advice on the second phase of the Publica transition. Cabinet welcomed the staff who formally joined the Council's employment on 1 July 2025 as part of this second phase.

The report also referenced the need to consider organisational change in the context of potential local government reorganisation (LGR). The importance of organisational culture was highlighted, as was ongoing work on a new People and Culture Strategy. It was noted that the report would be presented for full discussion at Council the following week, and no decision was required at this meeting.

It was observed that the Overview and Scrutiny function had significantly improved in recent years, noting a marked contrast with its effectiveness a decade ago. The current Chair of Overview and Scrutiny, Councillor Gina Blomefield, was praised for their integral role in this progress and the positive impact of the constitutional provision allowing the opposition to hold the position was acknowledged. The contribution of



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the former Vice Chair, Gary Selwyn, was also recognised, highlighting the strength of the cross-party leadership.

RESOLVED that Cabinet NOTED the report.

## **112 Planning Advisory Service (PAS) Peer Review and Action Plan**

The purpose of the report was to invite Cabinet to welcome the findings of the Planning Advisory Service (PAS) Planning Service Peer Challenge report (May 2025) and to agree the proposed Action Plan

Before inviting Councillor Juliet Layton, Cabinet Member for Housing and Planning, to introduce the report, the Leader of the Council confirmed a minor amendment to the recommendations. The word "endorse" was to be replaced with "welcome" in reference to the report, and Cabinet was to "agree" the resultant action plan rather than "endorse" it, as the action plan would be owned and implemented by Cabinet.

Councillor Juliet Layton introduced the item and confirmed that the Overview and Scrutiny Committee had considered the report. She also noted that both she and the report authors had attended the Overview and Scrutiny meeting to address any questions and provide clarification.

Councillor Layton advised that the Planning Advisory Service (PAS) had conducted a peer review of the planning service from 25 to 27 March 2025, engaging with a wide range of stakeholders to assess strengths and identify areas for improvement. The review highlighted the strength and collaborative approach of the planning team, with particular praise for the positive working culture.

The newly appointed Assistant Director of Planning Services and the Director of Communities and Place were present during the feedback session, contributing to a sense of stability and renewed leadership. An action plan had since been developed in response to the PAS recommendations, and confidence was expressed in the team's ability to deliver the actions within the proposed timescales.

Geraldine LeCointe, Assistant Director of Planning Services, introduced herself to Cabinet and confirmed that she had joined the Council during the week of the PAS peer review. The officer noted the positive feedback received across all areas of the planning service, including policy, development management, and enforcement and confirmed that all 13 recommended actions would be taken forward, recognising this as an ambitious but achievable plan, supported by a strong team and aimed at improving services for residents and stakeholders. Regular updates on progress would be provided to Councillor Layton, and the action plan was seen as a valuable foundation for future local government reorganisation.

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The Leader then invited Councillor Gina Blomefield, Chair of the Overview and Scrutiny Committee to give the committee's view.

Cabinet received and appreciated three key recommendations from Overview and Scrutiny, as outlined by Councillor Blomefield:

1. **Planning Enforcement Resourcing** – Councillor Blomefield highlighted long-standing concerns about whether planning enforcement was sufficiently resourced, noting the imminent departure of a valued officer.

Cabinet recognised the challenges in recruitment and retention and confirmed that resourcing enforcement would remain a priority within existing planning team resources, noting that the issue was not budgetary but due to difficulties in recruiting and retaining staff.

2. **Improved Communication Between Officers and Ward Members** – It was recommended that enforcement officers engage more regularly with local ward members, where appropriate, to share insights and potentially resolve cases more swiftly.

Cabinet agreed to arrange an all-member briefing on planning enforcement to promote shared understanding of legal constraints, improve communication, and strengthen working relationships between officers and members.

3. **Better Use of Technology** – Councillor Blomefield stressed the importance of enabling officers to make full use of available technology and AI, not just through access but through adequate training and process support.

Cabinet welcomed this and confirmed that the transformation team would prioritise digital innovation and user support to maximise the benefits of existing and future IT systems.

All three recommendations were well received, clearly understood, and considered valuable contributions to the improvement of the planning service.

The Assistant Director of Planning expressed full support for improving communication with ward members and highlighted the national challenges in recruiting enforcement officers. It was reported that the service was actively exploring internal options, including the potential redeployment of an experienced planning officer into an enforcement role.

It was noted that enforcement was a frequent concern at Town and Parish Council meetings. The gap between public expectations and the practical realities of enforcement was acknowledged, and improved communication was suggested as a way to help manage this.

Councillor Every committed to liaising with the Head of Communications to support officers in improving communications, including communications to members.

Councillor Layton proposed the recommendations, which were seconded by Councillor Evemy with the inclusion of the word 'welcome' and 'agree' as moved earlier in the discussion.

The recommendations as amended were put to the vote and agreed by Cabinet.

#### Voting Record

6 For, 0 Against, 0 Abstentions.

<b>To welcome the findings of the PAS (Planning Advisory Service) Planning Service Peer Challenge report (May 2025) and to agree the proposed Action Plan. (Resolution)</b>		
RESOLVED that Cabinet <ol style="list-style-type: none"><li>1. WELCOMED the findings of the PAS (Planning Advisory Service) Planning Service Peer Challenge report (May 2025) and</li><li>2. AGREED the proposed Action Plan and publication of the plan on specific pages of the CDC website.</li></ol>		
For	Patrick Coleman, Mike Evemy, Paul Hodgkinson, Juliet Layton, Andrea Pellegram and Tristan Wilkinson	6
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

## **113 Local Plan Update**

The purpose of the report was to confirm the way forward for the Local Plan.

Councillor Juliet Layton, Cabinet Member for Housing and Planning, introduced the report, recommending that Cabinet propose to Council the merging of the Partial Update of the Cotswold District Local Plan 2011–2031 with the Development Strategy and Site Allocations Plan into a single, comprehensive Local Plan. The proposal aimed to align with the Gloucestershire Strategic Plan where appropriate, with the objective of submitting the Local Plan to the Planning Inspectorate by December 2026 and securing adoption by late 2027.

To meet the submission deadlines a timetable was proposed:

- Regulation 18 Consultation: by September 2025
- Regulation 19 (Pre-submission) Consultation: by June 2026
- Submission to Planning Inspectorate: by December 2026

It was noted that failure to meet this timetable could result in delays of 5 to 7 years if local government reorganisation led to the creation of a new unitary authority, which would likely require restarting the process.

The urgent need for an updated Local Plan to maintain control over development in the district was highlighted, especially in light of the revised government housing target of 1,036 new homes per year. Councillors also noted the challenge posed by the fact that approximately 80% of the district falls within the Cotswold National Landscape (formerly AONB), significantly limiting land available for development. The importance of using up-to-date evidence, including an updated flood risk map from the Environment Agency, to support the case for a more realistic housing requirement was noted.

Cabinet also noted the tension between government-imposed housing targets and the district's climate ambitions. While higher-density urban development was more sustainable, members reaffirmed their commitment to delivering the best plan possible within current constraints and to challenging arbitrary housing targets where supported by robust evidence.

The Deputy Chief Executive and S151 officer and the Cabinet Member for Finance spoke to the financial implications of delivering the Local Plan and councillors noted that a total of £1 million had been allocated to the Local Plan programme to date. This included:

- An initial £500,000 in core budget provision
- A further £250,000 from internal resources
- A £240,000 grant from the Local Plan Delivery Fund (awarded March 2025)
- An additional £70,000 grant related to the Green Belt review

The Cabinet Member for Finance confirmed that any residual funding gaps would be manageable within existing contingency planning.

Cabinet acknowledged the need for external consultancy support to meet tight delivery timescales and noted that some consultancy costs had already been anticipated in the budget forecasts.

Officers also confirmed that further resource requirements would be monitored closely, and contingency funding options considered by the Deputy Chief Executive and S151 Officer as work progressed.

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Cabinet noted forecast savings of between £300,000 and £400,000 by moving from a twin-track Local Plan update to a single comprehensive plan, thereby reducing duplication of process, consultation, and evidence gathering.

Cabinet considered the establishment of a Local Plan Oversight Board, to meet monthly and monitor delivery. The Board would include:

- Cabinet Members
- Deputy Chief Executive and Section 151 Officer
- Officers from Planning Policy
- Relevant advisors

The Terms of Reference would be updated to reflect Cabinet input, including the removal of political group designations, to focus on delivery and accountability.

Cabinet acknowledged the importance of engaging Town and Parish Councils as key stakeholders, and that the Statement of Community Involvement was being adhered to, with further consultation planned.

The need for clear communication, balanced against available resources, to support the plan's successful delivery was acknowledged.

Concerns about the Cirencester Town Centre Masterplan were mentioned and the Assistant Director of Planning confirmed that an update would be provided to councillors with a full report expected to Cabinet in October 2025.

Cabinet received and appreciated six key recommendations from Overview and Scrutiny, as outlined by Councillor Blomefield and a full response to the recommendations was tabled at the meeting. Responses are summarised here:

### **1. Timely Updates to Overview and Scrutiny Committee**

That the Overview and Scrutiny Committee receives timely and regular updates as the Local Plan continues to develop, ensuring appropriate oversight and scrutiny throughout the process.

Cabinet welcomed ONS's involvement and committed to providing regular updates, proposing a meeting to agree how and when scrutiny would take place.

### **2. Communications and Engagement Strategy**

That a publicly available communications and engagement strategy be prepared for the Regulation 18 and 19 consultations, setting out:

- Methods of engagement (digital, in-person, targeted)
- Stakeholder mapping, including hard-to-reach groups
- Resourcing plans
- Validation of AI-generated summaries

- Plans to lobby government on unrealistic housing targets

Cabinet supported a strong engagement strategy beyond statutory requirements, including clear communication on site allocations, validation of AI summaries, and lobbying government on unrealistic housing targets.

### **3. Engagement with Town and Parish Councils**

That Town and Parish Councils are engaged in two-way dialogue on site allocations and development priorities from June 2026 as part of the Regulation 19 consultation.

Cabinet fully agreed and committed to proactive engagement with Town and Parish Councils, recognising them as key stakeholders in shaping site allocations and development priorities.

### **4. Establishment of a Local Plan (Contingency) Reserve**

That Cabinet considers establishing a Local Plan Contingency Reserve as part of the 2026/27 Budget Strategy and MTFS Update in October 2025.

Cabinet noted the suggestion and said while currently considering the existing £1 million funding sufficient, they would review the need for a contingency reserve in August 2025.

### **5. Assessment of Resource Sufficiency**

That Cabinet reviews whether proposed resources are sufficient to manage identified risks.

Cabinet agreed this was essential, confirmed resources have been reviewed, and added the Section 151 officer to the oversight board to ensure continued financial oversight and risk management.

### **6. Resourcing of Business-as-Usual Planning Functions**

That adequate resources are maintained for core planning functions, including applications and enforcement, and this is reflected in the 2026/27 Budget Strategy and MTFS Update in October 2025.

Cabinet fully accepted the recommendation, assuring that core planning services would be protected, with additional funds used to avoid diverting staff from essential planning operations.

Councillor Layton concluded by thanking officers, the Overview and Scrutiny Committee, and councillors for their ongoing support. She emphasised that the Council was building on four years of preparatory work and reiterated the shared commitment to protecting the Cotswolds while delivering a viable and timely Local Plan.

The recommendations were proposed by Councillor Juliet Layton and seconded by Councillor Mike Evemy.

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The recommendations were proposed as two separate votes.

**Vote 1.** To confirm the way forward for the Local Plan

Voting record:

6 For, 0 Against, 0 Abstain

**Vote 2.** To approve recommendations subject to Council approval of the recommended way forward for the Local Plan

Voting record:

6 For, 0 Against, 0 Abstentions.

<b>To confirm the way forward for the Local Plan (Resolution)</b>		
RESOLVED that Cabinet RECOMMEND to Council to resolve to merge the two ongoing Local Plan projects currently known as:		
a) the partial update of the adopted Cotswold District Local Plan (2011-2031); and		
b) the Development Strategy and Site Allocations Plan,		
into a single comprehensive Full Local Plan Update, incorporating work of the Gloucestershire Strategic Plan, where appropriate, with a view to submission of the single Local Plan in 2026 and adoption in 2027.		
For	Patrick Coleman, Mike Every, Paul Hodgkinson, Juliet Layton, Andrea Pellegram and Tristan Wilkinson	6
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

<b>To approve recommendations subject to Council approval of the recommended way forward for the Local Plan (Resolution)</b>	
Subject to Council's approval of merging the two Local Plans RESOLVED THAT Cabinet:	
1. UPDATE the Council's Community Infrastructure Levy in parallel with the Local Plan process.	
2. INVEST in additional resources to accelerate the delivery of the Local Plan to enable the December 2026 submission deadline to be hit.	
3. CONFIRM the delivery of the Local Plan as a Council priority.	
4. ESTABLISH a Local Plan Oversight Board and confirm a new Terms of Reference.	

For	Patrick Coleman, Mike Every, Paul Hodgkinson, Juliet Layton, Andrea Pellegram and Tristan Wilkinson	6
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

#### **114 Licenced HMO fee policy and HMO Amenity Standards policy**

The purpose of the report was to renew the HMO Licensing policy setting fees and the licence period.

Councillor Andrea Pellegram, Cabinet Member for Environment and Regulatory Services introduced the report which reviewed the Council's enforcement of Houses in Multiple Occupation (HMO) licensing, proposing an increase in the maximum license period from three to five years to benefit compliant landlords and allow focus on higher-risk properties. The report also addressed license fees, which consist of a non-refundable initial application fee and a subsequent fee covering inspection costs. The revised fees were designed to recover costs without generating surplus or significantly increasing landlords' expenses. A discount was recommended for landlords with a good compliance record who reapply promptly. The recommendations were to amend HMO license fees effective 1 September 2025 and to extend license durations to five years.

Councillor Pellegram thanked Paul Lankester, Principal Environmental Health officer for his work and support.

There were no questions for clarity.

The recommendation was proposed by Councillor Andrea Pellegram and seconded by Councillor Patrick Coleman.

The recommendations were put to the vote and agreed by Cabinet.

Voting record:

6 For, 0 Against ,0 Abstentions.

#### **To review the Housing in Multiple Occupation (HMO) licensing fees and the licence period (Resolution)**

RESOLVED that Cabinet:

1. Agreed to AMEND the HMO Licence Fees as set out in the report and for them



to apply from 1st September 2025; 2. APPROVED the HMO licence period increase from 3 years to 5 years.		
For	Patrick Coleman, Mike Evemy, Paul Hodgkinson, Juliet Layton, Andrea Pellegram and Tristan Wilkinson	6
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

## **115 15 Service Performance Report 2024-25 Quarter 4**

The purpose of the report was to provide an update on progress on the Council's priorities and service performance for Q4 2024-25.

The report was introduced by Councillor Mike Evemy, Leader of the Council, given that the report had been presented to Overview and Scrutiny on 14 July Councillor Evemy confirmed that he and the officer were happy answer questions.

It was noted that Councillor Andrea Pellegram was responsible for street signs and that the report should be updated on p.189 to reflect that.

Members noted that leisure centre performance had exceeded targets, with gym memberships and visitor numbers performing strongly despite the fragile economy. This success was attributed to Freedom Leisure, the provider in place for nearly two years. It was also reported that delivery of the cultural strategy, previously listed as behind target, had now commenced.

Concerns were raised regarding the unresolved crossing issues on the Spine Road in South Cerney, which were seen as critical for health, safety, tourism, and active travel. Members requested an update, noting the involvement of the sustainable transport officer. Clarification was provided that the issue related to a road crossing near a historic bridge, which could not be moved and continued to present constraints.

**ACTION:** Business Information and Performance Lead to provide an update on the Spine Road Crossing.

Members discussed the electrification of taxis in relation to climate goals, and it was agreed that while Councillor Mike McKeown, Cabinet Member for Climate Change and Digital, would lead, close coordination with the Councillor Andrea Pellegram, the Cabinet Member responsible for licensing, would be necessary to support implementation.

It was further noted that 45 households had installed solar and attention was drawn to Cotswold Housing First an exemplary model helping those in most need to resolve the challenges they faced.

Cabinet welcomed the fact that 14 village halls had received grants from the Rural England Prosperity Fund.

Councillor Blomefield, as Chair of Overview and Scrutiny Committee, informed Cabinet that she wished to invite representatives from Freedom Leisure to attend a meeting together with the responsible Cabinet Member for Health, Culture and Visitor experience

It was noted that planning service performance had exceeded all application determination targets, and the rate of appeals allowed remained well below target, which was welcomed. While the Planning Advisory Service had raised concerns about reliance on extensions of time, it was acknowledged this practice was common and appropriate in certain circumstances. Members highlighted the importance of continued focus on underperforming areas, with portfolio holders committing to work with lead officers to improve future outcomes. The receipt of grant funding to support delivery was also noted positively.

RESOLVED that Cabinet NOTED the report.

## **116 Financial Performance Report 2024-25 Quarter 4**

The Purpose of the report was to set out the final outturn position for the 2024/25 financial year.

David Stanley, Deputy Chief Executive Officer, introduced the report which had been reviewed at Overview and Scrutiny Committee.

A positive outturn for the 2024/25 revenue budget was reported. While the original 2024/25 budget had anticipated a contribution of £516,000 to the Financial Resilience Reserve, the actual outturn delivered a surplus of £778,000 — an additional £262,000 above budget.

Cabinet was reminded of the Council motion approved in November 2023, which required the replenishment of the Financial Resilience Reserve following the use of £1.852 million to balance the budgets for 2022/23 and 2023/24. Based on current projections, contributions to the reserve could total £1.874 million across 2024/25 and 2025/26, representing a more favourable position than originally expected.

Cabinet

10/July2025

It was confirmed that the additional £262,000 surplus would be transferred to the Council's Transformation Reserve to support service redesign and prepare for potential local government reorganisation.

Cabinet was informed that the Council had been contacted by the Department for Levelling Up, Housing and Communities (DLUHC) and invited to a meeting on 22 July 2025 to discuss transitional arrangements under the Fair Funding Review. Cotswold District Council, along with Stroud and Tewkesbury, had been identified as potentially facing a negative funding adjustment. In view of this and other financial risks, Members were advised to exercise caution and prioritise essential spending.

Councillor Patrick Coleman, Cabinet Member for Finance, expressed concern that the outcomes of the Fair Funding Review were likely to disadvantage smaller, rural councils such as Cotswold. He acknowledged the longstanding structural funding challenges but commended the proactive financial planning undertaken. He noted that the Council had secured significant capital receipts and praised the Deputy Chief Executive Officer for maintaining close oversight of national developments and making effective use of external financial advice from consultants PIXEL.

Councillor Gina Blomefield raised concerns regarding underperformance in car park enforcement and income from annual parking permits and requested that these matters be included in the Council's Scrutiny Programme for autumn 2025. It was confirmed that enforcement activity had already been strengthened, and that a revised Parking Strategy would be presented to Cabinet in October or November 2025.

Cabinet reiterated the importance of maximising local revenue sources in light of expected reductions in government grant funding. Councillors welcomed the 2024/25 outturn surplus and supported the transfer of part of the surplus to the Transformation Reserve. It was further noted that although current higher interest rates and limited borrowing had temporarily benefitted the Council's financial position, significant future challenges remained. These included the impact of the Fair Funding Review and the potential for local government reorganisation within the coming years.

The recommendations were proposed by Councillor Patrick Coleman and seconded by Councillor Mike Every.

The recommendations were put to the vote and agreed by Cabinet.

Voting record:

6 For, 0 Against, 0 Abstentions.

**To note the Outturn Position for 2024/25 and approve and note recommendations (Resolution)**

RESOLVED that Cabinet:

1. REVIEWED and NOTED the outturn financial position set out in the report.
2. REVIEWED and NOTED the Non-treasury Prudential Indicators in Annex B.
3. APPROVED the transfer to and from reserves as set out in paragraph 2.15 to 2.18 and 6.1 to 6.6 and Annex C.
4. APPROVED the carry forward of unspent capital budget included in paragraph 6.5 of £0.565m into the 2025/26 Capital Programme.
5. NOTED the change in provisions as set out in paragraph 2.14

For	Patrick Coleman, Mike Every, Paul Hodgkinson, Juliet Layton, Andrea Pellegram and Tristan Wilkinson	6
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

**117 Next Meeting.**

The next meeting of Cabinet was noted as being on 4 September at 6pm.

The Meeting commenced at 6.00 pm and closed at 9.00 pm

(END)



Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET 4 SEPTEMBER 2025</b>
Subject	<b>PREVENTING HOMELESSNESS STRATEGY 2025-2030</b>
Wards affected	All
Accountable member	Councillor Juliet Layton Cabinet Member for Housing and Planning Email: <a href="mailto:Juliet.layton@cotswold.gov.uk">Juliet.layton@cotswold.gov.uk</a>
Accountable officer	Jon Dearing – Interim Assistant Director Email: <a href="mailto:Democratic@Cotswold.gov.uk">Democratic@Cotswold.gov.uk</a>
Report author	Caroline Clissold – Business Manager Housing Email: <a href="mailto:Democratic@Cotswold.gov.uk">Democratic@Cotswold.gov.uk</a>
Summary/Purpose	To present a new Preventing Homelessness Strategy which will assist the Council to deliver its statutory duties towards those households facing homelessness.
Annexes	Annex A – Preventing Homelessness Strategy 2025-2030 Annex B – Action Plan Annex C – Equalities Impact Statement (EIA)
Recommendation(s)	That Cabinet resolves to: 1. Approve the implementation of the Preventing Homelessness Strategy 2025-2030 with immediate effect
Corporate priorities	<ul style="list-style-type: none"> <li>• Delivering Good Services</li> <li>• Delivering Housing</li> <li>• Supporting Communities</li> <li>• Supporting the Economy</li> </ul>
Key Decision	NO
Exempt	NO



**COTSWOLD**  
District Council

Consultees/ Consultation	Leader of the Council, Chief Executive, Director of Communities and Place, Chief Finance Officer, Head of Legal Services, Interim Executive Director, Interim Managing Director (Publica), Internal and External Stakeholders
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## **1. EXECUTIVE SUMMARY**

- 1.1** The Homelessness Reduction Act (HRA) 2017 introduced statutory duties that Local Authorities must adhere to in order to respond to and prevent homelessness. HRA included new duties such as the requirement to prevent homelessness.
- 1.2** The Housing Team is the statutory service responsible for ensuring that the council meets the statutory requirements as laid down by the Homelessness Reduction Act 2017 (alongside other legislative requirements)
- 1.3** Cotswold District Council has had many successes since the Homelessness Reduction Act was introduced. Investment in resources and services has meant that there has been a significant reduction of rough sleeping with the council reporting low to zero numbers at any one time.
- 1.4** However, for many and often complex reasons, homelessness is rising across the country. This is also reflected within the district, with average numbers of households in some form of temporary accommodation having risen by a third during 2024-2025.
- 1.5** For 2025 onwards therefore there must be a strong focus on preventing homelessness at the earliest possible stage to achieve the aim of reducing temporary accommodation usage.

## **2. BACKGROUND**

- 2.1** Within the legal duties, Housing must provide a full and accessible Housing Options service, which includes, but is not limited to preventing homelessness and relieving homelessness should it occur. The Housing Team must also provide provision of safe and appropriate emergency accommodation for vulnerable residents where no other accommodation is available.
- 2.2** The Housing Team are also responsible for maintaining a fair and transparent Choice Based Lettings system (HomeseekerPlus) and supporting households in B&B emergency accommodation as well as in Council owned Hostels.
- 2.3** The Housing Team has seen many changing demands over the last 7 years including the introduction of new legislation, the Covid Pandemic and the issues facing our residents from rising cost of living implications. The service has also seen new



burdens from the introduction of the Domestic Abuse Act and various strands of housing related refugee work.

- 2.4** As a result, the Council has seen increasing numbers of people seeking assistance with Housing related issues which are in turn impacting on their accommodation meaning that they are either homeless or threatened with homelessness. The Housing Team has seen contacts rise by on average 20 – 30% year on year since 2021.
- 2.5** Preventing homelessness is always the best approach for both the customer and the local authority. The Housing Team, on average, prevent over 200 households a year in the Cotswold district from becoming homeless. By finding people alternative long-term accommodation or negotiating with family or landlords to keep people in their homes, the use of expensive B&B accommodation is lessened.
- 2.6** The Housing Team also take a robust approach to rough sleeping, working with our Outreach service to identify and contact rough sleepers at the very first sighting. This approach means that Cotswold has no entrenched rough sleepers and regularly report low to zero numbers of 'new to the street' rough sleeping.
- 2.7** Since mid-2024 however, numbers of households presenting as homeless to the Council have risen by up to 30% year on year as the cost-of-living crisis deepens. Lack of move on accommodation for singles in either temporary accommodation or supported adult homelessness accommodation within the countywide pathways, combined with additional new pressures from other cohorts is also impacting on the Housing service.
- 2.8** To effectively manage and ensure that services are available for residents facing homelessness, the Council must have a robust Preventing Homelessness Strategy and Action Plan.

### **3. PREVENTING HOMELESSNESS STRATEGY 2025-2030**

- 3.1** Section 2(1) of the Homelessness Act 2002 requires local authorities to undertake regular reviews of homelessness within their area. Section 1(4) requires local authorities to publish a new homelessness strategy based on the results of this review.
- 3.2** The Homelessness Reduction Act 2017 introduced significant changes to how local authorities must statutorily assess and support households who are both at risk of





homelessness (the Prevention Duty) and to those that become homeless (the Relief Duty).

- 3.3** To support local authorities with these duties, each council receives an annual ringfenced Homelessness Prevention Grant (HPG) which sets out three key outcomes:
- Embed the Homelessness Reduction Act by increasing activity to prevent single homelessness and rough sleeping
  - Reduce the number of families in unsuitable temporary accommodation by maximising family homelessness prevention.
  - Reduce the use of B&B accommodation for families and eliminate family B&B placements beyond the statutory six-week limit.
- 3.4** Any Preventing Homelessness strategy must therefore be mindful of both the legislation and the ringfenced conditions of the HPG.
- 3.5** A review of the increasing demands on the Housing service and client groups most at risk of homelessness has been undertaken alongside an assessment of available emergency accommodation, countywide services, Supported Accommodation pathways, and longer-term housing options. The conclusion of this review has formed the basis for the Aims and Priorities included in the new Preventing Homelessness Strategy.
- 3.6** The strategy sets out 4 Key Aims and Priorities:
- |            |  |
|------------|--|
| Priority 1 | <b>Preventing Homelessness</b>   |
| Priority 2 | <b>Establishing effective partnerships and working arrangements.</b>       |
| Priority 3 | <b>Supporting rough sleepers to address their housing and other needs.</b> |
| Priority 4 | <b>Increasing Accommodation Options</b>                                    |
- 3.7** The Preventing Homelessness Strategy 2025-2030 (Annex A) will work alongside other strategies to increase accommodation options such as the Local Plan and the Long-Term Empty Homes Strategy 2024-2029.
- 3.8** A full Action Plan (Annex B) has also been developed to chart progress of the short-term and long-term aims of the Strategy.



#### **4. CONCLUSIONS**

- 4.1** The adoption of the Preventing Homelessness Strategy 2025-2030 provides a clear framework for the management of services to respond to residents needing support with Housing issues.
- 4.2** Once adopted, the Preventing Homelessness Action Plan will be regularly reviewed, and progress of each aim charted for future service design to meet and adapt to changing needs.

#### **5. ALTERNATIVE OPTIONS**

- 5.1** The Council could decide not to adopt the Strategy.

#### **6. FINANCIAL IMPLICATIONS**

- 6.1** An annual Homelessness Prevention Grant (HPG) is awarded to each local authority to assist in preventing homelessness. Cotswold District Council 2025/26 grant allocation of £369,227 in May 2025.
- 6.2** MHCLG funding for the homeless is subject to grant terms and conditions. For 2025/26, a new ring fence within the HPG has been introduced to maintain prevention activities during this period. This means that 49 per cent of the funding allocation must be spent on prevention, relief and staffing activity. The 49 per cent within this ringfence must not be spent on temporary accommodation.
- 6.3** The Aims of the Preventing Homelessness Strategy 2025-2030 fully complies with the conditions set out in the current HPG award.
- 6.4** However, from 2026/27 funding from the HPG will be rolled into the overall Settlement Funding Assessment allocation rather than being separately ringfenced.
- 6.5** The risk of any such consolidation of the existing grant arrangement may result in a lower allocation for 2026/2027 putting the delivery of some actions at risk.
- 6.6** The Council may therefore need to consider in 2026/2027 how to meet statutory obligations whilst balancing other priorities.

#### **7. LEGAL IMPLICATIONS**

- 7.1** Section 2(1) of the Homelessness Act 2002 requires local authorities to undertake regular reviews of homelessness within its area.



**7.2** Section 1(4) requires local authorities to publish a new homelessness strategy based on the results of this review.

**7.3** The aim of this report is to comply with the legislative requirement and therefore fulfil the Council's statutory duties

## **8. RISK ASSESSMENT**

**8.1** This strategy seeks to define how the Council will meet its statutory duties to 'Prevent and Relieve' homelessness, ensure that rough sleeping is kept to a minimum, but preferably to zero. Expanding accommodation options to meet rising demand is also a key focus for the Council

**8.2** Failure to prevent homelessness occurring will result in further rises in the use of expensive and inappropriate B&B, which is both detrimental to the client and has severe financial implications for the Council.

**8.3** A strong, person-centred prevention approach is therefore essential, in the best interests of both residents and the Council.

**8.4** Should the allocation of the current Homelessness Prevention Grant reduce or fundamentally change for 2026/2027; this could impact on the ability to deliver against some of the Action Plan priorities.

**8.5** Members will therefore need to consider how to meet the statutory obligations should the funding reduce significantly.

## **9. EQUALITIES IMPACT**

**9.1** An equalities impact assessment has been completed that shows no negative impact on those who share a protected characteristic and those who do not.

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

**10.1** None

## **11. BACKGROUND PAPERS**

**11.1** None

(END)

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# Preventing Homelessness Strategy

April 2025



**COTSWOLD**  
District Council

# Foreword

Becoming homeless, or fearing that this could potentially occur, can have a major impact on the lives of individuals: their health, well-being, employment opportunities, education, and training may all be affected if suitable, long term accommodation options are not made available to them.

Homelessness is an issue which is high on the national agenda. The 'Everyone In' response to the COVID-19 pandemic has shown what can be achieved in addressing rough sleeping. Locally this helped people in transformative ways which has continued beyond the pandemic. The countrywide joined-up response gained national praise and attention. We need to continue to build on this progress and the commitments of this strategy reflect this.

Homelessness isn't just a term used for those that we see visibly rough sleeping and can happen to anyone at any time. Most people who approach our council for advice on their housing situation are not sleeping rough but are instead at various stages of being threatened with homelessness.

There are many reasons why someone may be threatened with homelessness with many people living in precarious or unsuitable homes. This could include people who are; private renting, but their tenancy is about to end; living with family or a partner but relationships are breaking down; are sofa surfing; or have suffered an income shock and are no longer able to afford their mortgage or rent.

As part of developing the strategy and setting out our Priorities we have reflected on a wide evidence base including reviewing data regarding our local housing market, our population demographics as well as assessing homelessness trends specific to our area.

In drawing up the strategy, we have consulted with our stakeholders and partners.

It is intended that this strategy be a live document with a regularly updated Action Plan and annual reviews to ensure this continues to reflect our shared aims and evolving priorities.

We cannot deliver the priorities and actions set out in the strategy alone, and therefore the continued collaboration and support of our partners is key to its success. A multi-agency approach and working alongside community partners is the only way that this can happen effectively.



**Cllr Juliet Layton**



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Priority 3 Supporting rough sleepers to address their housing and other needs.

Priority 4 Increasing Accommodation Options

Action Plan, Monitoring and Review arrangements



# Introduction

Working with our residents and partners to prevent and resolve homelessness and the threat of homelessness is at the very heart of this strategy.

The most obvious form of homelessness, those sleeping rough on the streets, is not common in the Cotswold district, thanks to our strong partnership approach to 'No Second Night Out' which aims to end rough sleeping and subsequent initiatives introduced during the pandemic.

However, homelessness in general is increasing in all local authorities. Factors such as the cost-of-living crisis, increasing rents in the private sector, substance misuse, mental ill health, family and relationships breaking down, increases in pressures financially and a lack of genuinely affordable housing are key reasons why homelessness is increasing. These are key issues for this strategy to address.

Preventing homelessness before it occurs is the main ethos of the Homelessness Reduction Act (HRA) 2017. However, Cotswold District Council has taken this even further by investing in a strong approach to engaging with residents at the very earliest stage, to prevent homelessness before official duties are triggered under HRA 2017 by increasing resources specifically to target this.

The Council has also supported a strong 'No Second Night Out' approach to ensuring that anyone who does find themselves rough sleeping is offered an accommodation option as soon as possible.

Cotswold Council works in close partnership with local partners to provide a Housing First scheme for adults with complex needs who have exhausted all other accommodation options. The council also works closely with our partners across the county on ensuring the adults with complex needs can access relevant supported accommodation and services when they need it. The council also owns and manages 2 properties that provide emergency accommodation with onsite support: one to adults with complex needs and the second to families which keeps stays in B&B/Hotel type accommodation to a minimum. These schemes are key contributors to the reason why the district has low to zero rough sleeping.

However, since 2020 despite the many proactive and progressive initiatives introduced as the result of the pandemic, homelessness within the district has increased by around 30%. The council is seeing increased requests for support from people who need to leave their homes due to many, and often complex issues. These include receiving notices from private landlords, are fleeing abuse or violence, are living in unsafe or insecure accommodation or whose home is not suitable to meet their specific housing needs for health or financial reasons.

However, as volumes of people needing housing and homelessness interventions increase, use of unsuitable and expensive B&B accommodation is increasing; therefore, the council has developed strong a prevention focused Housing service that aims to increase the numbers of households who are prevented from becoming homeless at the earliest possible stage.

In developing this strategy, Cotswold District Council has reviewed the key issues that are driving up homelessness both locally and nationally which has informed the focus of the strategy to the following four objectives:

- Priority 1    **Preventing Homelessness**
- Priority 2    **Establishing effective partnerships and working arrangements**
- Priority 3    **Supporting rough sleepers to ~ address their housing and other needs**
- Priority 4    **Increasing Accommodation Options**

These priorities are intended to be high level and therefore the strategy will be sufficiently flexible to accommodate and respond to changes in the external environment during its lifetime.

A detailed action plan has been developed in collaboration with our partners to support and deliver the strategic objectives. We recognise that during the five-year life span of this Strategy we will need to prioritise and even change direction with certain objectives and actions.

This document will provide a basis for the direction of travel and will guide us in our current and future activities.



# Cotswold District Council Overview



**91,311**  
Population  
(2022)



**26%** of the local  
population are over  
65, which is **8%**  
above the national  
average



Median House Price:  
**£440,000**  
(December 2024)



Median House Price v  
median earnings median:

**14.88 x**  
median wage  
(single person)



**Tenure Split**

Owner Occupied **65%**

Private Rent **19%**

Social Housing **15%**



Estimated Total Number  
of Dwellings from Census  
2021:

**37,217**

**District**

Cotswold

District Council

**Location**

One of six districts within  
Gloucestershire County, England

**Area**

1200 km<sup>2</sup>



**1,794**

Applicants registered  
for Housing  
(March 2025)



**244**

Households offered  
Affordable or Social  
rents in 2024/25



Total number of housing advice and  
homelessness inquiries, including housing  
register applications:

Pre Covid: around **300** approaches  
annually

**During and post Covid:**

2021/22: **490** approaches

2022/23: **633** approaches

2023/24: **742** approaches



**1,018**

Number of  
households seeking 1  
bed accommodation



**31**

Number of  
Households  
in emergency  
accommodation  
(March 2025)

# Housing In Cotswold District Council

## General



53

Number of Licenced  
HMO's



15.4%

of the Cotswold district  
have a defined disability  
under the Equalities Act



**One in eight**  
households in  
the district are  
considered to be in  
fuel poverty



900

Number of Empty Homes  
(January 2025)



Average monthly rents  
in the Private Sector:

1 bed **£726**

2 beds **£951**

3 Beds **£1,278**

## Homelessness

Top three Main Reasons for Homelessness



1

Rough Sleeper  
identified as rough  
sleeping March  
2025 snapshot

36%

Family/  
Relationship  
Breakdown

13%

Ending of  
a Private  
Rented  
Tenancy

12%

Domestic  
Abuse



Number of households  
seeking accommodation  
by bedroom need  
March 2025:

1 bed **1,018**

2 bed **472**

3 bed **239**

4+ bed **65**

## Successes



Maintained a low to zero number of Rough Sleepers – recording between **0-2** consistently at official monthly and annual counts



Provision of two properties providing **16** units of emergency accommodation dedicated onsite support



Worked with our partners at Bromford to provide an additional **10** units of emergency accommodation



Worked with our partners at Bromford and P3 to provide a Housing First option for the most complex of our residents



Prevented over **200** households from becoming homeless in 2024/25



Provided emergency accommodation for over a **120** households whose homelessness couldn't be prevented in 2024/25



Worked with our county partners, our housing provider partners and Domestic Abuse support agencies to provide places of safety in the district for those fleeing violence



**458** Affordable homes delivered between 2020 and 2025.

## Challenges for Cotswold District Council in Preventing Homelessness

- Affordability and access to the private rented sector
- High demand for affordable housing
- High support needs compared to locally available services.
- Lack of available wider short term temporary accommodation options
- Lack of available emergency accommodation for people with disabilities
- Meeting the housing needs of young people, especially care leavers and those from rural areas;
- Lack of One bed general needs accommodation
- Low number of HMO's to meet the needs of under 35's

## Wider challenges within the Cotswold District that contribute increasing homelessness

- Low wages compared to housing costs
- Air B&B / Second Homes/ Holiday Lets / Empty Homes
- Tackling disrepair and poor standards of accommodation in the private sector

# Strategic Aims and Priorities

## Priority 1: Preventing homelessness

Given the challenges we face around increasing homelessness it is crucial that we continue to put homeless prevention at the heart of everything we do. This principle will form the basis of how we respond to the economic hardships faced by our residents impacted by the continuing cost of living crisis.

Being flexible, agile and adapting to local challenges will be key in meeting future issues that may lead to homelessness if not tackled.

We will find innovative and proactive ways of both understanding and addressing the factors that can lead to homelessness - such as the impact of the Renters Rights Bill on private sector tenancies and landlords, family/relationship breakdown and discharge from institutions.

We will also develop a greater understanding of the impact of wider social issues such as poverty and disadvantage, unemployment, poor health and wellbeing and lack of access to affordable, decent homes.

We believe this will greatly increase the chances of positive outcomes for people at risk of becoming homeless.

### Key Objectives

- Monitor and act on the impact of the implementation of the Homelessness Reduction Act within the council's Housing Team and wider housing services.
- Develop further preventative actions based on the evidence of what has previously been successful in preventing homelessness
- Understanding and tackling the economic impacts of the cost-of-living crisis that may otherwise lead to homelessness.
- Develop greater understanding of the 'triggers' that are driving homelessness presentations
- Identify and respond to the housing needs of vulnerable groups.
- Review how customers contact us and interact with our service.
- Promote the HomeseeckerPlus housing application process and provide support for people to use it
- Continue to effectively communicate with people about how to avoid the risk of homelessness, ensuring that advice and appropriate support is readily available.

## Priority 2: Establishing effective partnerships

The previous Preventing Homelessness strategy emphasised partnership working to co-ordinate activity and focus combined energies on preventing homelessness and improving services for homeless people.

With this new strategy we will develop this approach further. Over the life of this strategy, we will build stronger relationships with our partners and ensure that our collective efforts to tackle homelessness and rough sleeping are effectively aligned.

### Key Objectives

- Continue to establish appropriate pathways for customers between agencies which reinforce the early identification of factors that may be likely to lead to a risk of homelessness.
- Build on and improve existing processes to ensure an effective 'duty to refer' from all relevant public sector bodies as set out in the Homelessness Reduction Act.
- Ensure that the council's workforce have the appropriate skills to assist all client groups
- Challenge and resolve barriers to effective service delivery as part of business as usual.



## Priority 3: Supporting rough sleepers to address their housing and other needs

Although the intelligence-based estimates show low to zero numbers of rough sleepers in the district, our priority remains to prevent all forms of rough sleeping when it does occur.

We recognise many more people are living in insecure accommodation such as having to 'sofa surf' or rely on the good will of friends or relatives and are therefore at risk of rough sleeping.

### Key Objectives

- Align efforts and resources with partners to tackle homelessness and rough sleeping.
- Work with our countywide partners to support and evaluate a new Outreach service, to better understand the causes of local rough sleeping as well as the pattern and locations of rough sleepers.

- Work with the community and local businesses act as 'eyes and ears' to ensure that no rough sleeper goes without support
- Support rough sleepers who are ready for independent living to move into longer-term accommodation and to sustain their tenancy.
- Evaluate and adapt housing pathways, and develop new ones where they do not exist, to ensure they meet the needs of those living with complex needs as well as new/emergent client groups.
- Build on existing work with partner organisations to develop appropriate supported housing solutions, such as the 'Housing First' model, for homeless people with the highest level of need.

## Priority 4: Increasing Accommodation Options

The use of impractical expensive B&B placements for people experiencing homelessness has long been viewed as unsuitable for anything more than to address an urgent need for safe accommodation.

Therefore, developing new temporary accommodation solutions to meet local needs is a more sustainable way to address this and is a key priority for the council.

### Key Objectives

- Ensure that council priorities are aligned by linking this strategy with the targets included in the Local Plan to increase affordable housing supply.
- Ensure that our countywide priorities are aligned by working with our county partners to develop an increase in the supply of move on accommodation for all supported housing pathways.

- Maintain efficient and appropriate use of all council owned temporary accommodation, ensure that all residents are provided with high level support to enable them to move on into long term accommodation.
- Expand the range of temporary accommodation available to our customers, including investigating all options to purchase or lease buildings and working with the private sector
- Develop a greater understanding of what may encourage private landlords to increase the supply of rented accommodation at a cost households can afford and how we may assist with making this a realistic housing solution.
- Work with Registered Providers to develop schemes that increase accommodation options.



**COTSWOLD**  
District Council

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# Action Plan

## Priority 1: Preventing homelessness.

What do we want to achieve?	What are we going to do to achieve this?	Actions 2025/26	Progress	Date
Put Homelessness Prevention at the heart of everything we do.	Monitor and act on the impact of the implementation of the Homelessness Reduction Act within the council's Housing Team and wider housing services	Monitor the impact of the Homelessness Reduction Act (HRA) on housing services and customer outcomes.		
		Review H-CLIC data quarterly, perform case reviews on Housing casework.		
		Collect feedback from partner agencies and other internal services.		
	Develop further preventative actions based on the evidence of what has previously been successful in preventing homelessness	Integrate local and national homelessness prevention data to improve services.		
		Compare our service to our Nearest Neighbours (demographically not geographically) and implement 'good practices' identified.		
		Seek feedback from our customers their experiences.		
		Analyse successful pre- prevention outcomes achieved by the Complex Needs Team and embed this learning into the principles and systems of the service.		
	Understanding and tackling the economic impacts of the cost-of-living crisis that may otherwise lead to homelessness	Understand the impact of the cost-of-living crisis and other financial impacts such as welfare reform on rising evictions due to rent arrears.		
		Work with our internal partners to ensure our financial support offers meeting the needs of the clients (including the Prevention Fund, Discretionary Housing Payment (DHP), Client Support, links to charities).		
		Strengthen relationships with local private rented landlords.		
		Develop partnerships with Registered Housing Providers and local voluntary sector financial advice services.		

What do we want to achieve?	What are we going to do to achieve this?	Actions 2025/26	Progress	Date
Put Homelessness Prevention at the heart of everything we do.	Develop greater understanding of the 'triggers' driving homelessness presentations.	Identify triggers of homelessness related to family breakdowns and implement intervention strategies.		
		Ensure staff are fully trained in negotiation and mediation techniques.		
		Monitor the effects of the increased pressures of the Refugee crisis.		
		Review and analyse the information that we gather in relation to homelessness and adapt future services and interventions in response to what we learn.		
	Identify and respond to the housing needs of vulnerable groups.	Build on existing interventions for vulnerable client groups and develop new interventions where there are identified gaps for:		
		Care leavers		
		Young People		
		Adults with Complex Needs (e.g. Mental Health, Addictions, Learning Disabilities)		
		Domestic Abuse Victims		
		Prison Leavers		
		Veterans		
		Refugee's		
	Review how customers contact us and interact with our service.	Ensure that there are multiple, easy to access channels for people to get in touch: phone, email, face to face.		
		Ensure that customers are offered a range of options to meet their specific needs.		
		Work with partners on Digital Inclusion, Outreach and contact points with internet access.		
	Promote the HomeseekerPlus housing application process and provide support for people to use it.	Schedule regular social media campaigns to promote HomeseekerPlus.		
	Continue to effectively communicate with people about how to avoid the risk of homelessness, ensuring that advice and appropriate support is readily available.	Schedule regular social media campaigns to raise awareness of homelessness and the support available.		



## Priority 2: Establishing effective partnerships, working arrangements and support to those who are threatened with homelessness, to improve their resilience and reduce the risk

What do we want to achieve?	What are we going to do to achieve this?	Actions 2025/26	Progress	Date
Establishing effective partnerships, working arrangements and support to those who are threatened with homelessness, to improve their resilience and reduce the risk homelessness occurring.	Establish partnerships with local agencies (e.g., housing, social services, mental health, and employment support) to create a collaborative framework for supporting individuals at risk of homelessness.	Monitor and review trends in homelessness approaches from customers.		
		Build on existing partnerships and allocate resources for training and coordination.		
		Work with our commissioning partners to review the Alliance services around Prevention.		
		Work with Registered Providers on identifying households at threat of eviction.		
	Work with our Commissioning partners to ensure Countywide services meet the needs of our clients.	Work with our commissioning partners to review the Alliance services around Outreach services.		
		Monitor rough sleeping referrals with our Outreach Provider to establish trends and respond accordingly.		
		Develop clear referral pathways between agencies such as housing, health, and employment to ensure early identification of at-risk individuals.		
	Build on and improve existing processes to ensure an effective 'duty to refer' from all relevant public sector bodies as set out in the Homelessness Reduction Act.	Review the effectiveness of the current IT system that supports 'Duty to Refer'.		
		Promote 'Duty to Refer' in all dealings with statutory agencies.		
	Ensure that the council's workforce have the appropriate skills to assist all client groups.	Identify skills gaps in the council's workforce related to homelessness prevention and ensure targeted training for all employees who interact with at-risk individuals.		
		Ensure that the workforce has a strong 'trauma informed' approach to tackling the most complex casework by offering continuous training.		
		Ensure that all staff receive regular Domestic Abuse and Safeguarding training to maximise referrals to appropriate services.		
		Ensure Retrospective Learning principles are embedded into practise.		
	Challenge and resolve barriers to effective service delivery as part of business as usual.	Identify key barriers to service delivery (e.g., bureaucratic, financial, or communication-related) and implement solutions to overcome them.		

### Priority 3: Supporting Rough Sleepers to address their housing and other needs

What do we want to achieve?	What are we going to do to achieve this?	Actions 2025/26	Progress	Date
Supporting rough sleepers to address their housing and other needs.	Align efforts and resources with partners to prevent homelessness and rough sleeping before it occurs.	Focus on early intervention to prevent rough sleeping from occurring.		
		Work with our countywide partners to support and evaluate a new Outreach service for 2025 onwards, to better understand the causes of local rough sleeping as well as the pattern and locations of rough sleepers.		
		Investigate new and innovative ways of providing Outreach to those that need it.		
	Work with the community and local businesses act as 'eyes and ears' to ensure that no rough sleeper goes without support.	Promote Streetlink through regular social media campaigns.		
		Provide ongoing and regular training sessions for Parish Councils and Members.		
	Evaluate and adapt housing pathways, and develop new ones where they do not exist, to ensure they meet the needs of those living with complex needs as well as new/emergent client groups.	Develop clear referral pathways between agencies such as housing, health, and employment to ensure early identification of at-risk individuals.		
	Build on existing work with partner organisations to develop appropriate supported housing solutions.	Review the effectiveness of the current 'Housing First' model with our stock transfer partner, for homeless people with the highest level of need.		
		Encourage and broaden the participation of other providers in 'Housing First' type solutions.		

## Priority 4: Increase Accommodation Options

What do we want to achieve?	What are we going to do to achieve this?	Actions 2025/26	Progress	Date
Increasing Accommodation Options.	Ensure that Council priorities are aligned	Link this strategy with the targets included in the Local Plan to increase affordable housing supply.		
	Ensure that Countywide priorities are aligned	Work with our county partners to develop an increase in the supply of move on accommodation for all supported housing pathways.		
	Maintain efficient and appropriate use of all council owned temporary accommodation, ensure that all residents are provided with high level support to enable them to move on into long term accommodation.	Embed the Temporary Accommodation Service Standard process in all that we do.		
		Provide support to households placed in all forms of temporary accommodation to help them address issues that may be barriers to moving into settled housing.		
		Review our current policy and processes to support more rapid move-on from temporary and supported accommodation and provide support into new permanent accommodation when possible.		
		Work with our Registered Provider partners to reduce the use of bed and breakfast and nightly paid temporary accommodation, instead providing appropriate temporary accommodation options or move on options from emergency accommodation.		
	Develop a greater understanding of what may encourage private landlords to increase the supply of rented accommodation at a cost households can afford and how we may assist with making this a realistic housing solution.	Work with our colleagues in Empty Homes to find ways to incentivise and/or encourage owners of Long-Term Empty Properties to bring them back into use.		
		Ensure that our Homelessness and Rough Sleeping grant is utilised to encourage offers of private rented accommodation to assist in discharging our homelessness duties.		
	Work with Registered Providers to develop schemes that increase accommodation options.	Work with our Registered Provider partners to encourage tenants who are under occupying to downsize into non-family accommodation.		

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**Equality and Rurality Impact Assessment Form****Annex C**

When completing this form you will need to provide evidence that you have considered how the 'protected characteristics' may be impacted upon by this decision. In line with the General Equality Duty the Council must, in the exercise of its functions, have due regard for the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This form should be completed in conjunction with the guidance document available on the Intranet

Once completed a copy should be emailed to cheryl.sloan@publicagroup.uk to be signed off by an equalities officer before being published.

1. Persons responsible for this assessment:

Names: Caroline Clissold	
Date of assessment: 4 <sup>th</sup> August 2025	Telephone: 01591 810000 Email: caroline.clissold@publicagroup.uk

2. Name of the policy, service, strategy, procedure or function:

Preventing Homelessness Strategy 2025-2030	Is this a new or existing one? <b>New</b> /Existing (please delete as appropriate)
--	---

3. Briefly describe its aims and objectives

Local Authorities have a statutory obligation to regularly review homelessness and publish a Preventing Homelessness Strategy. Based on the results of the review, The <b>Strategic Aims and Priorities</b> are: Priority 1 <b>Preventing Homelessness</b> Priority 2 <b>Establishing effective partnerships and working arrangements.</b> Priority 3 <b>Supporting rough sleepers to address their housing and other needs.</b> Priority 4 <b>Increasing Accommodation Options</b>	
--	--

## 4. Are there any external considerations? (e.g. Legislation/government directives)

Legislation:

Section 2(1) of the Homelessness Act 2002 requires local authorities to undertake regular reviews of homelessness within its area. Section 1(4) requires local authorities to publish a new homelessness strategy based on the results of this review.

Homelessness Reduction Act 2017 & subsequent Code Of Guidance

## 5. What evidence has helped to inform this assessment?

Source	✓	If ticked please explain what
Demographic data and other statistics, including census findings	✓	
Recent research findings including studies of deprivation	✓	
Results of recent consultations and surveys	<input type="checkbox"/>	
Results of ethnic monitoring data and any equalities data	✓	
Anecdotal information from groups and agencies within Gloucestershire	✓	
Comparisons between similar functions / policies elsewhere	✓	
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	✓	H-CLIC and Locally produced data from a Choice Based Letting system

## 6. Please specify how intend to gather evidence to fill any gaps identified above:

A full action plan has been created to run alongside the Strategy and will be kept under constant review

## 7. Has any consultation been carried out?

Yes

Details of Consultation

Informally with internal and external stakeholders

If NO please outline any planned activities

## 8. What level of impact either directly or indirectly will the proposal have upon the general public / staff? (Please quantify where possible)

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>
LOW – Few members of the general public/staff will be affected by this proposal	<input type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input checked="" type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>
Comments: e.g. Who will this specifically impact? Residents who are homeless or threatened with homelessness, particularly vulnerable groups	

## 9. Considering the available evidence, what type of impact could this function have on any of the protected characteristics?

*Negative – it could disadvantage and therefore potentially not meet the General Equality duty;**Positive – it could benefit and help meet the General Equality duty;*

*Neutral – neither positive nor negative impact / Not sure*

	Potential Negative	Potential Positive	Neutral	Reasons	Options for mitigating adverse impacts
Age – Young People		✓			
Age – Old People		✓			
Disability		✓			
Sex – Male		✓			
Sex – Female		✓			
Race including Gypsy and Travellers		✓			
Religion or Belief		✓			
Sexual Orientation		✓			
Gender Reassignment			✓		
Pregnancy and maternity		✓			
Geographical impacts on one area			✓		
Other Groups			✓		
<b>Rural considerations:</b> ie Access to services; leisure facilities, transport; education; employment; broadband.			✓		

## 10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale




11. Is there is anything else that you wish to add?

--

### Declaration

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where a negative impact has been identified actions have been developed to lessen or negate this impact. We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

Completed By:	Caroline Clissold	Date:	04/08/2025
Line Manager:	Jon Dearing	Date:	
Reviewed by Corporate Equality Officer:	Claire Locke	Date:	07/08/2025

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**COTSWOLD**  
District Council

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET 4 SEPTEMBER 2025</b>
Subject	<b>PRIVATE SECTOR HOUSING CIVIL PENALTIES POLICY AND HOUSE IN MULTIPLE OCCUPATION (HMO) AMENITY STANDARDS</b>
Wards affected	All
Accountable member	Cllr Andrea Pellegram, Cabinet Member for Environment and Regulatory Services Email: <a href="mailto:andrea.pellegram@cotswold.gov.uk">andrea.pellegram@cotswold.gov.uk</a>
Accountable officer	Jon Dearing, Interim Executive Director Email: <a href="mailto:jon.dearing@Cotswold.gov.uk">jon.dearing@Cotswold.gov.uk</a>
Report author	Philip Measures, Service Leader Email: <a href="mailto:philip.measures@Cotswold.gov.uk">philip.measures@Cotswold.gov.uk</a>
Summary/Purpose	To review and renew the Civil Penalties Enforcement Policy and the HMO Amenity Standards policy.
Annexes	Annex A – The Civil Penalties Enforcement Policy Annex B – The HMO Amenity Standards Annex C – The Equality and Rural Impact Assessment
Recommendation(s)	That Cabinet resolves to: <ol style="list-style-type: none"> <li>1. Approve the Policy for Civil Penalties under the Housing and Planning Act 2016 and The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.</li> <li>2. Approve the HMO Amenity Standards Policy</li> <li>3. Delegate authority for revisions to the Civil Penalties Policy and the issuing of Civil Penalties to the Business Manager, Environmental, Welfare and Revenue Service, in consultation with the Head of Legal Services.</li> </ol>



Corporate priorities	<ul style="list-style-type: none"><li>• Delivering Good Services</li><li>• Delivering Housing</li><li>• Supporting Communities</li></ul>
Key Decision	NO
Exempt	NO
Consultees/ Consultation	Business Manager Housing Portfolio Holder



## **1. EXECUTIVE SUMMARY**

- 1.1** This report is concerned with renewed policies and standards with respect to private sector housing, to take account of legislative changes and new guidance from tribunal decisions.
- 1.2** The Renters Rights Bill currently passing through both Houses, will introduce many changes to Private Sector Housing regulation and these policies seek to prepare for these. The new policies are provided in Annexes A and B.

## **2. BACKGROUND**

- 2.1 The Civil Penalties Enforcement Policy.** The Environmental Health team are responsible for regulating the private rented sector and protecting tenants by ensuring landlords and agents comply with relevant obligations. When enforcement action is necessary, and there is a failure to comply, there are the options of prosecution or the issuance of a Civil Penalty. A policy is required for the process of applying Civil Penalties; this was first introduced in 2019, and it has now been reviewed. The above-mentioned proposed Renters Reform Bill will place a greater demand and expectation on Housing Authorities to improve standards in the private rented sector through advice and regulation. The expectation of the Ministry of Housing, Communities and Local Government is for there to be a greater emphasis on enforcement through the application of Civil Penalties where necessary, and the fines received are used to support the cost of this work. It is therefore important to have a robust Civil Penalties Policy that is up to date with Tribunal decisions on the application of penalties.
- 2.2** The new policy was developed by commissioning the work of Justice for Tenants (JFT), a non-profit organisation that has received grant funding to support local authorities in effectively using Civil Financial Penalties. JFT has, with the support of central government and the Association of Chief Environmental Health Officers, created a model financial penalty policy for local authority use following a detailed review of relevant guidance, the 54 procedural precedents relating to financial penalties, and over half of all First Tier Tribunal appeal decisions.
- 2.3** The new Policy is set out in Annex A.
- 2.4 The HMO Amenity standards.** This was first published originally over a decade ago as a Gloucestershire policy on all HMOs, with additional standards applying to



licensable HMOs, which are subject to licence conditions. An HMO is a House in Multiple Occupation where two or more tenants of different households share facilities. Where there are five or more tenants sharing facilities, a licence is required. These are issued by local authorities, who administer, regulate, and inspect such accommodation. Currently, there are 42 HMOs licensed by the Council.

- 2.5** The change in definition of a licensable HMO has significantly increased the number of licences, and therefore it is appropriate to update the policy to cover all types of HMOs, providing guidance to all interested parties, such as landlords, letting agents, and tenants, on the current standards required and expected. The new Policy is set out in Annex B.

### **3. ALTERNATIVE OPTIONS**

- 3.1** The Council may approve, amend, or reject the proposed policy as it sees fit.

### **4. FINANCIAL IMPLICATIONS**

- 4.1** It is hard to predict what the actual income will be from issuing Civil Penalties and the intention is to secure compliance without the need to serve a civil penalty. Any income from the penalties is ringfenced to the service for enforcement purposes.
- 4.2** There are no financial implications with respect to the HMO amenity policy.

### **5. LEGAL IMPLICATIONS**

- 5.1** The legal framework for the imposition of penalties and enforcement generally, is set out in the Civil Enforcement Policy.
- 5.2** A House in Multiple Occupation (HMO) is a building or part of a building occupied by two or more households as their main residence and who share basic amenities such as a bathroom or a kitchen (Housing Act 2004 Part 7 Section 254). When five or more people occupy an HMO, the HMO requires a licence to be provided by the Local Housing Authority. If a property is operating as a licensable HMO without the required licence, the Council can prosecute the responsible person.
- 5.3** Larger HMOs that are occupied by more than six people, also require planning permission. The duty is on the responsible person to ensure they are compliant with all relevant legislation. Consultation between Environmental Health, Planning and Building Control Services takes place when applications are made, resulting in possible enquiries or investigations from other parts of the Council.



**5.4** Legal enforcement work is underpinned by the Council Enforcement Policy. The Civil Penalties Enforcement Policy and the HMO Amenity Standards are necessary to support Private Sector Housing regulation and enforcement.

**5.5** When legal action is undertaken, the Environmental Health Service will lead on housing offences, supported if required, by the Counter Fraud Enforcement Unit (CFEU). The CFEU will generally lead on Offences under the Proceeds of Crime Act 2002.

## **6. RISK ASSESSMENT**

**6.1** The risk of not having robust and up to date policies is that of challenge to enforcement decisions and having decisions quashed, set aside, or varied. This adds delay and costs in resolving housing issues and improvements for the lives of tenants.

## **7. EQUALITIES IMPACT**

**7.1** Provided in Annex C.

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

**8.1** There are no direct implications because of this report. However, the better regulation of the private rented sector will include ensuring standards are met concerning for example, excess cold, which is about heating a home more efficiently and effectively. There are, therefore, positive implications in this regard, and there are no negative implications identified from the changes.

## **9. BACKGROUND PAPERS**

**9.1** None  
(END)

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## **Civil Penalties under the Housing and Planning Act 2016 and The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020**

In this policy, the term 'landlord' should be read as including letting agents, managing agents, licensors, property owners, directors of corporate landlords and any other person involved in the letting or management of privately rented accommodation.

In this policy, the term 'House of Multiple Occupation' or 'HMO' are defined by the Housing Act 2004.

Section 126 and Schedule 9 of the Housing and Planning Act 2016 provide local authorities with the power, through the insertion of section 249A Housing Act 2004, to impose a civil penalty as an alternative to prosecution in respect of the following offences under the Housing Act 2004:

- Failure to comply with an Improvement Notice [section 30]
- Offences relating to licensing of Houses in Multiple Occupation (HMOs) under Part 2 [section 72]
- Offences in relation to the Selective Licensing of 'houses' under Part 3 [section 95]
- Failure to comply with an Overcrowding Notice [section 139]
- Failure to comply with a management regulation in respect of an HMO [section 234]

Regulation 11 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 provides local authorities with the power to impose a

## Annex A

civil penalty in respect of breaches of Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.

In addition, section 23 of the Housing and Planning Act 2016 provides that a civil penalty may be imposed in respect of a breach of a Banning Order.

Cotswold District Council has the power to impose a civil penalty of up to a maximum of £30,000 for each separate offence. If multiple offenders have committed the same offence at the same property, a separate civil penalty can, and usually will, be imposed on each offender. In each case, the level of civil penalty imposed on each offender will be in line with this policy.

This document outlines the Council's policy in setting the level of a civil penalty in each case where it has been determined to issue a civil penalty as an alternative to prosecution proceedings.

The Council considers the need for transparency and consistency in the discharge of its functions under the Housing Act 2004 to be of primary importance. The general objective of this policy is to promote both transparency and consistency in the imposition of financial penalties under the 2004 Act so that, for example, those managing and having control of rented properties in the Council area

(a) know how the Council will generally penalise relevant offences and

(b) are assured that, generally, similar cases will be penalised similarly and different cases penalised differently. The further objectives of using financial penalties as a means of enforcing the above offences are explained below.

## Statutory Guidance

The Government has issued statutory guidance under Schedule 9 of the Housing & Planning Act 2016 entitled "Civil penalties under the Housing and Planning Act 2016. Guidance for Local Housing Authorities". The Council has regard to this guidance in the exercise of their functions in respect of civil penalties.

Paragraph 3.5 of the statutory guidance states that 'The actual amount levied in any particular case should reflect the severity of the offence, as well as taking account of the landlord's previous record of offending'. The same paragraph sets out several factors to be taken into account to ensure that the civil penalty is set at an appropriate level in each case:

- a. **Severity of the offence.** The more serious the offence, the higher the penalty should be.
- b. **Culpability and track record of the offender.** A higher penalty will be appropriate where the offender has a history of failing to comply with their

obligations and/or their actions were deliberate and/or they knew, or ought to have known, they were in breach of their legal responsibilities. Landlords are running a business and should be expected to be aware of their legal obligations.

- c. **The harm caused to the tenant.** This is a very important factor when determining the level of penalty. The greater the harm or the potential for harm (this may be as perceived by the tenant), the higher the amount should be when imposing a civil penalty.
- d. **Punishment of the offender.** A civil penalty should not be regarded as an easy or lesser option compared to prosecution. While the penalty should be proportionate and reflect both the severity of the offence and whether there is a pattern of previous offending, it is important that it is set at a high enough level to help ensure that it has a real economic impact on the offender and demonstrate the consequences of not complying with their responsibilities.
- e. **Deter the offender from repeating the offence.** The ultimate goal is to prevent any further offending and help ensure that the landlord fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set at a high enough level such that it is likely to deter the offender from repeating the offence.
- f. **Deter others from committing similar offences.** While the fact that someone has received a civil penalty will not be in the public domain, it is possible that other landlords in the local area will become aware through informal channels when someone has received a civil penalty. An important part of deterrence is the realisation that (a) the local authority is proactive in levying civil penalties where the need to do so exists and (b) that the level of civil penalty will be set at a high enough level to both punish the offender and deter repeat offending.
- g. **Remove any financial benefit the offender may have obtained as a result of committing the offence.** The guiding principle here should be to ensure that the offender does not benefit as a result of committing an offence, i.e. it should not be cheaper to offend than to ensure a property is well maintained and properly managed.

The factors detailed in the statutory guidance and policy aims will be considered by the Council when deciding where, within the Civil Penalties matrix below, a particular offence and penalty fall.

## **Other Policy Aims**

The Council is mindful that despite its best efforts, some landlords may operate unlawfully for a significant period without detection, and only a proportion of landlords committing relevant offences will be discovered. The Council recognises that when deciding to impose a Civil Penalty, it should create an environment where it is clear to the offender and others, that operating unlawfully as a landlord will be financially disadvantageous when compared to operating lawfully.

The Council intends to create an environment where landlords engage with the Council's requests and demands fulsomely, openly and honestly. This helps create a level playing field which supports the aims of transparency and consistency. No landlord should be able to financially benefit from withholding information the Council deems relevant that is, or should be, in their control to disclose. It is expected that fulsome and complete supporting evidence is provided to support any written representations received in response to a Notice of Intent.

## **Civil Penalties Matrix**

In determining the level of a civil penalty, the Council will have regard to the matrix set out below, which is to be read in conjunction with the associated guidance. The matrix is intended to provide an indicative 'starting level' under the various offence categories, with the final level of the civil penalty adjusted in each case, taking into account aggravating and mitigating factors the Council deems significant. These factors include, but are not limited to, factors relating to the track record and culpability of the landlord and the actual or potential harm to the occupants or others at risk.

In deciding what level of penalty to impose, officers will conduct the following four stage process. First, they will consider the seriousness of the relevant housing offence to identify a starting level of the penalty. Second, an assessment of the number of rental properties controlled or owned or managed by the landlord and/or their experience in the letting/management of property will be considered, which may have the effect of increasing or decreasing the penalty. Third, aggravating and mitigating factors that may relate to many factors including, but not limited to, culpability, track record, harm or potential harm will be considered, which may have the effect of increasing or decreasing the penalty. Fourth, if any of the discounts, as set out below, apply, the penalty will be decreased.

Once the seriousness of the relevant housing offence has been identified, the starting level of the penalty will be identified using the table below with the headings

## Annex A

'Seriousness of offence' and 'Starting level [£]'. Consideration of the number and type of rental properties controlled or owned or managed may adjust the penalty.

To reflect the seriousness of the offence(s) in question, the presence of one or more mitigating factors will rarely result in the penalty being decreased in excess of a total of £5,000. In exceptional circumstances, officers may determine that the presence of one or more mitigating factors justify a decrease in the penalty in excess of £5,000. The presence of numerous mitigating factors will not automatically be considered as exceptional circumstances.

The Council has not provided a list of mitigating factors in this policy because it acknowledges that there is a myriad of possible circumstances that might give rise to mitigation.

To ensure that any penalty imposed is proportionate to the offending behaviour, the presence of one or more aggravating factors will rarely result in the penalty being increased in excess of a total of £5,000. In exceptional circumstances, officers may determine that the presence of one or more aggravating factors justify an increase in the penalty in excess of £5,000. The presence of numerous aggravating factors will not automatically be considered as exceptional circumstances.

The Council may, exceptionally, including for the reason given above, increase the penalty by greater than £5,000 on account of aggravating factors or, again exceptionally, decrease it by greater than £5,000 on account of mitigating factors. In order to meet the objectives of this policy, including the need for transparency and consistency in the use of such penalties, the Council will exercise its discretion to increase or decrease a penalty by greater than £5,000 on account of aggravating or mitigating factors in exceptional circumstances only excluding any discounts as set out below. The Council will consider on a case-by-case basis whether any such circumstances exist.

<b>Seriousness of offence</b>	<b>Starting level [£]</b>
Mild	2,500
Moderate	7,500
Serious	12,500
Very Serious	17,500
Severe	22,500
Very Severe	27,500

## **Offences where a civil penalty may be levied as an alternative to prosecution and relevant considerations as to the level of that penalty**

### **Failure to comply with an Improvement Notice - Section 30 of the Housing Act 2004**

*Maximum Court fine following prosecution that can be levied for failure to comply with an Improvement Notice - Unlimited*

An Improvement Notice served under Part 1 Housing Act 2004 specifies repairs/improvements that the recipient should carry out in order to address one or more identified Category 1 and/or Category 2 hazards in a property. Category 1 hazards are the most serious hazards, judged to have the highest risk of harm to the occupiers; the Council has a duty to take appropriate action where a dwelling is found to have one or more Category 1 hazards present.

In some cases, the service of an Improvement Notice will have followed an informal stage, where the landlord had been given the opportunity to carry out improvements without the need for formal action. In such cases, an identified failure to comply with an Improvement Notice will represent a continued failure on the part of the landlord to deal appropriately with one or more significant hazards affecting the occupier[s] of and/or those at risk at the relevant dwelling.

The Council would view the offence of failing to comply with the requirements of an Improvement Notice as a significant issue.

The seriousness of the offence is viewed by the Council as being a severe matter, attracting a financial penalty with a starting level of £22,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £17,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £22,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings,

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and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £27500.

### *Aggravating features/factors specific to non-compliance with an Improvement Notice*

- The nature and extent of hazards that are present. Multiple hazards and/or severe/extreme hazards that are considered to have a significant impact on the health and/or safety of the occupant[s] in the property or visitors to the property, would justify an increase in the level of the civil penalty.

### *Generic aggravating features/factors*

The Council will have regard to general factors in determining the final level of the civil penalty including, but not limited to:

- A previous history of non-compliance would justify an increased civil penalty. Non-exhaustive examples of previous non-compliance would include previous successful prosecutions [including recent convictions that were 'spent'], receipt of financial penalties, rent repayment orders, works in default of the landlord and breaches of regulations/obligations, irrespective of whether these breaches had been the subject of separate formal action.
- A failure to cooperate with a Council investigation. Non-exhaustive examples of failure to cooperate would include failing to comply with a s.16 Local Government (Miscellaneous Provisions) Act 1976 notice, failing to comply with a s.235 Housing Act 2004 notice, failing to provide a substantive response to a letter of alleged offence.
- Deliberate intent when committing the offence. Non-exhaustive examples of deliberate intent would include knowledge that the offence was occurring, committing the offence after relevant correspondence was sent by the Council.
- The number of residents placed at risk.
- Offending over an extended period of time i.e. 3 months or longer.
- Whether any vulnerable residents were in occupation at the time of the offence. Non-exhaustive examples of vulnerable residents include young adults and children, persons vulnerable by virtue of age, persons vulnerable by virtue of disability or sensory impairment, persons with a drug or alcohol addiction, victims of domestic abuse, children in care or otherwise vulnerable

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by virtue of age, people with complex health conditions, people who do not speak English as their first language, victims of trafficking or sexual exploitation, refugees, asylum seekers.

### **Failure to License offences**

*Maximum Court fine following prosecution that can be levied for failure to license an HMO or Part 3 House – Unlimited*

#### ***Failure to license a Mandatory 'HMO' – Section 72(1) of the Housing Act 2004***

Under Part 2 Housing Act 2004, most higher risk HMOs occupied by 5 or more persons forming 2 or more households are required to hold a property licence issued by the local authority. HMO licensing was introduced to allow local authorities to regulate standards and conditions in high risk, multiply occupied residential premises. Through the property licence regime, local authorities ensure that the HMO has sufficient kitchens, baths/showers and WCs and place a limit on the number of persons permitted to occupy it and the licence holder is required to comply with a set of licence conditions.

The Council would view the offence of failing to license an HMO as a significant failing; Licensing was introduced by the Government in order to regulate management, conditions, standards and safety in the properties considered to represent the highest risk to tenants as regards such matters as fire safety and overcrowding.

This seriousness of the offence is viewed by the Council as being a Very Serious matter, attracting a financial penalty with a starting level of £17,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £12500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £17,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no



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other relevant factors or aggravating factors [see below], will increase by £5,000, attracting a civil penalty of £22,500.

### *Aggravating features/factors specific to failure to licence offences*

- The condition of the unlicensed property. The nature and extent of any significant hazards that are present would justify an increase in the level of the civil penalty. Equally, an HMO that was found to be poorly managed and/or lacking amenities/fire safety precautions and/or overcrowded would also justify an increased civil penalty.
- Any demonstrated evidence that the landlord/agent was familiar with the need to obtain a property licence e.g. the fact that they were a named licence holder or manager in respect of an already licensed premises.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

## **Failure to Comply with an Overcrowding Notice – Section 139 of the Housing Act 2004**

### *Maximum Court fine following prosecution that can be levied for failure to comply with an Overcrowding Notice – Unlimited*

Section 139 Housing Act 2004 allows the Council to serve an Overcrowding Notice in respect of an HMO that is not required to be licensed under Part 2 Housing Act 2004. The notice specifies, on a room-by-room basis, the maximum number of persons allowed to occupy each room as sleeping accommodation or that the room is not considered suitable for that purpose.

The Council would view the offence of failing to comply with the requirements of an Overcrowding Notice as a significant matter, exposing the tenant[s] of an HMO to unacceptably cramped living conditions.

The seriousness of the offence is viewed by the Council as being a Very Serious matter, attracting a financial penalty with a starting level of £17,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £1,2500.

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Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £17,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £22,500.

### *Aggravating features/factors specific to non-compliance with an Overcrowding Notice*

- The level of overcrowding present – breaches that related to over-occupation of multiple rooms or extreme over-occupation of an individual room would justify a higher civil penalty.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

## **Failure to Comply with a Banning Order – Section 21 of the Housing And Planning Act 2016**

*Maximum Court fine that can be levied for failure to comply with a Banning Order following prosecution – Unlimited. In addition, the Court can also impose a prison sentence for up to 51 weeks.*

The Housing and Planning Act 2016 includes provisions and processes for a person to be banned from being involved, for a specified period, in one or more of the following activities:

- Letting housing
- Engaging in letting agency work
- Engaging in property management work

Banning Orders are reserved for what are recognised as being the most serious housing-related offences. In the event that the Council was satisfied that the offence of breaching a Banning Order had occurred, this would normally be the subject of prosecution proceedings. Where it was determined that a civil penalty would be appropriate in respect of a breach of a Banning Order, this would normally be set at the maximum level of £30,000 to reflect the severity of the offence.

**Failure to Comply with The Management of Houses in Multiple Occupation [England] Regulations 2006 and The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007**

*Maximum Court fine following prosecution that can be levied for failure to comply with each individual regulation - unlimited*

The Management of Houses in Multiple Occupation (England) Regulations 2006 impose duties on the persons managing HMOs in respect of:

- Providing information to occupiers [Regulation 3]
- Taking safety measures, including fire safety measures [Regulation 4]
- Maintaining the water supply and drainage [Regulation 5]
- Supplying and maintaining gas and electricity, including having these services/appliances regularly inspected [Regulation 6]
- Maintaining common parts [Regulation 7]
- Maintaining living accommodation [Regulation 8]
- Providing sufficient waste disposal facilities [Regulation 9]

The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007 impose duties on the persons managing HMOs as defined by Section 257 Housing Act 2004 in respect of:

- Providing information to occupiers [regulation 4]
- Taking safety measures, including fire safety measures [regulation 5]
- Maintaining the water supply and drainage [regulation 6]
- Supplying and maintaining gas and electricity, including having these services/appliances regularly inspected [regulation 7]
- Maintaining common parts [regulation 8]
- Maintaining living accommodation [regulation 9]
- Providing sufficient waste disposal facilities [regulation 10]

It is important that the manager of an HMO complies with all regulations, but the Council recognises that a failure to comply with certain regulations is likely to have a much bigger impact on the safety and comfort of residents than others.

***Failure to comply with the duty of manager to provide information to occupier***

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to provide information to occupier as a mild matter, attracting a financial penalty with a starting level of £2,500.

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Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £2,000, attracting a civil penalty of £500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £2,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £2000, attracting a civil penalty of £4500.

### *Aggravating features/factors specific to Management Regulation breach offences*

- The number and/or nature and/or extent of the management regulation breach(es) and/or the deficiencies within each regulation.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

### ***Duty of manager to take safety measures***

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to take safety measures as a Very Serious matter, attracting a financial penalty with a starting level of £17,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £12,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £17,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings,

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and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £22,500.

### *Aggravating features/factors specific to Management Regulation breach offences*

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

### ***Duty of manager to maintain water supply and drainage***

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to maintain the water supply and drainage as a serious matter, attracting a financial penalty with a starting level of £12,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £7500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £12500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £17,500.

### *Aggravating features/factors specific to Management Regulation breach offences*

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

***Duty of manager to supply and maintain gas and electricity***

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to maintain the gas and electricity supply as a Serious matter, attracting a financial penalty with a starting level of £12,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £7,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £12,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5,000, attracting a civil penalty of £17,500.

***Aggravating features/factors specific to Management Regulation breach offences***

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

***Generic aggravating features/factors***

As set out under 'Failure to comply with an Improvement Notice' above.

***Duty of manager to maintain common parts, fixtures, fittings and appliances***

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to maintain the common parts, fixture, fittings and appliances as a Moderate matter, attracting a financial penalty with a starting level of £7,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £2,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or

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five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £7,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5,000, attracting a civil penalty of £12,500.

### *Aggravating features/factors specific to Management Regulation breach offences*

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

### ***Duty of manager to maintain living accommodation***

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to maintain the living accommodation as a Moderate matter, attracting a financial penalty with a starting level of £7,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £2,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £7,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5,000, attracting a civil penalty of £12,500.

### *Aggravating features/factors specific to Management Regulation breach offences*

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

*Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

***Duty to provide waste disposal facilities***

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to provide waste disposal facilities as a Moderate matter, attracting a financial penalty with a starting level of £7,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £2,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £7,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5,000, attracting a civil penalty of £12,500.

*Aggravating features/factors specific to Management Regulation breach offences*

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

*Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

**Breach of licence conditions – Section 72(3) Housing Act 2004**

*Maximum Court fine following prosecution that can be levied for failure to comply with a licence condition - unlimited*

All granted HMO licences impose a set of conditions on the licence holder. These conditions impose a variety of obligations relating to the letting, management and condition of the rented property.



It is important that the manager of a licensed property complies with all imposed conditions, but the Council recognises that a failure to comply with certain licence conditions is likely to have a much bigger impact on the safety and comfort of residents than others.

***Failure to comply with licence conditions related to:***

- ***Signage or the provision of information for tenants***
- ***Provision of written terms of occupancy for tenants***
- ***Procedures regarding complaints***
- ***Procedures regarding vetting of incoming tenants***
- ***Compliance with deposit protection legislation***
- ***The recording and provision of information regarding rent payments***
- ***Procedures relating to rent collection***
- ***The provision of information regarding occupancy of the property***
- ***The provision of information regarding change of managers or licence holder details***
- ***The provision of information related to changes in the property***
- ***The provision of information relating to a change in mortgage provider***
- ***Requirements relating to the sale of the property***
- ***Attending training courses***
- ***Requirements to hold insurance***
- ***The provision of insurance documentation***
- ***The provision of or obtaining of suitable references***
- ***The provision of keys and alarm codes***
- ***Security provisions for access to the property***
- ***The provision of suitable means for occupiers to regulate temperature***

The Council would view the seriousness of the offence of failing to comply with a licence condition relating to the bullet points directly above as a mild matter, attracting a financial penalty with a starting level of £2,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £2,000, attracting a civil penalty of £500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £2,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings,

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and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £2,000, attracting a civil penalty of £4,500.

### *Aggravating features/factors specific to Licence Condition breach offences*

- The number and/or nature and/or extent of the licence condition regulation breach(es) and/or the deficiencies within each licence condition breach.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

### ***Failure to comply with licence conditions related to:***

- ***Procedures and actions regarding Inspections***
- ***Procedures regarding Repair issues***
- ***Maintenance and use of common parts (including gardens, outbuildings and property exterior) and living areas***
- ***Safeguarding occupiers and minimising disruption during works***
- ***The provision of information regarding alterations and construction works***
- ***Procedures regarding emergency issues***
- ***Waste and waste receptacles, pests, minor repairs, alterations or decoration.***
- ***Giving written notice prior to entry***
- ***Allowing access for inspections***
- ***Minimising risk of water contamination***
- ***The compliance of furnishings or furniture with fire safety regulations***

The Council would view the seriousness of the offence of failing to comply with a licence condition relating to the bullet points directly above as a Moderate matter, attracting a financial penalty with a starting level of £7,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £2,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £7,500.

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Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £12,500.

### *Aggravating features/factors specific to Licence Condition breach offences*

- The number and/or nature and/or extent of the licence condition regulation breach(es) and/or the deficiencies within each licence condition breach.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

### ***Failure to comply with licence conditions related to:***

- ***The provision of documentation regarding energy performance certificates, fire detection and prevention, emergency lighting, carbon monoxide detection, fire risk assessments, gas installations, electric installations and appliances***
- ***Notification of legal proceedings, contraventions and other relevant information that may affect a fit and proper person status***
- ***Procedures and actions regarding ASB***

The Council would view the seriousness of the offence of failing to comply with a licence condition relating to the bullet points directly above as a Serious matter, attracting a financial penalty with a starting level of £12,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £7,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £12,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no

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other relevant factors or aggravating factors [see below], will increase by £5,000, attracting a civil penalty of £17,500.

### *Aggravating features/factors specific to Licence Condition breach offences*

- The number and/or nature and/or extent of the licence condition regulation breach(es) and/or the deficiencies within each licence condition breach.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

### ***Failure to comply with licence conditions related to:***

- ***Minimum floor areas***
- ***Occupancy rates***
- ***Occupancy of rooms or areas that are not to be used as sleeping accommodation***
- ***Limits on number of households allowed to occupy the property or part of the property***
- ***Regular testing of alarms (smoke detectors/alarms, and heat detectors/alarms)***

The Council would view the seriousness of the offence of failing to comply with a licence condition relating to the bullet points directly above as a Very Serious matter, attracting a financial penalty with a starting level of £17,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £12,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £17,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £22,500.

### *Aggravating features/factors specific to Licence Condition breach offences*

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- The number and/or nature and/or extent of the licence condition regulation breach(es) and/or the deficiencies within each licence condition breach.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

### ***Failure to comply with licence conditions related to:***

- ***The condition or existence of smoke alarms, carbon monoxide alarms, emergency lighting, gas installations, electric installations and appliances, fire detection or other fire safety features or requirements***
- ***A safe means of escape***

The Council would view the seriousness of the offence of failing to comply with a licence condition relating to the bullet points directly above as a Severe matter, attracting a financial penalty with a starting level of £22,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £17,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £22,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5,000, attracting a civil penalty of £27,500.

### *Aggravating features/factors specific to Licence Condition breach offences*

- The number and/or nature and/or extent of the licence condition regulation breach(es) and/or the deficiencies within each licence condition breach.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

**Failure to Comply with Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020**

Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 impose duties on private landlords in relation to electrical installations. Regulation 3 is detailed below:

**3. Duties of private landlords in relation to electrical installations**

- (1) A private landlord who grants or intends to grant a specified tenancy must—
  - (a) ensure that the electrical safety standards are met during any period when the residential premises are occupied under a specified tenancy;
  - (b) ensure every electrical installation in the residential premises is inspected and tested at regular intervals by a qualified person; and
  - (c) ensure the first inspection and testing is carried out—
    - (i) before the tenancy commences in relation to a new specified tenancy; or
    - (ii) by 1st April 2021 in relation to an existing specified tenancy.
- (2) For the purposes of sub-paragraph (1)(b) "at regular intervals" means—
  - (a) at intervals of no more than 5 years; or
  - (b) where the most recent report under sub-paragraph (3)(a) requires such inspection and testing to be at intervals of less than 5 years, at the intervals specified in that report.
- (3) Following the inspection and testing required under sub-paragraphs (1)(b) and (c) a private landlord must—
  - (a) obtain a report from the person conducting that inspection and test, which gives the results of the inspection and test and the date of the next inspection and test;
  - (b) supply a copy of that report to each existing tenant of the residential premises within 28 days of the inspection and test;
  - (c) supply a copy of that report to the local housing authority within 7 days of receiving a request in writing for it from that authority;
  - (d) retain a copy of that report until the next inspection and test is due and supply a copy to the person carrying out the next inspection and test; and
  - (e) supply a copy of the most recent report to—
    - (i) any new tenant of the specified tenancy to which the report relates before that tenant occupies those premises; and

(ii) any prospective tenant within 28 days of receiving a request in writing for it from that prospective tenant.

(4) Where a report under sub-paragraph (3)(a) indicates that a private landlord is or is potentially in breach of the duty under sub-paragraph (1)(a) and the report requires the private landlord to undertake further investigative or remedial work, the private landlord must ensure that further investigative or remedial work is carried out by a qualified person within—

- (a) 28 days; or
- (b) the period specified in the report if less than 28 days, starting with the date of the inspection and testing.

(5) Where paragraph (4) applies, a private landlord must—

- (a) obtain written confirmation from a qualified person that the further investigative or remedial work has been carried out and that—
  - (i) the electrical safety standards are met; or
  - (ii) further investigative or remedial work is required;
- (b) supply that written confirmation, together with a copy of the report under sub-paragraph (3)(a) which required the further investigative or remedial work to each existing tenant of the residential premises within 28 days of completion of the further investigative or remedial work; and
- (c) supply that written confirmation, together with a copy of the report under sub-paragraph (3)(a) which required the further investigative or remedial work to the local housing authority within 28 days of completion of the further investigative or remedial work.

(6) Where further investigative work is carried out in accordance with paragraph (4) and the outcome of that further investigative work is that further investigative or remedial work is required, the private landlord must repeat the steps in paragraphs (4) and (5) in respect of that further investigative or remedial work.

(7) For the purposes of sub-paragraph (3)(e)(ii) a person is a prospective tenant in relation to residential premises if that person—

- (a) requests any information about the premises from the prospective landlord for the purpose of deciding whether to rent those premises;
- (b) makes a request to view the premises for the purpose of deciding whether to rent those premises; or
- (c) makes an offer, whether oral or written, to rent those premises.

## Annex A

It is important that a private landlord complies with all aspects of Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020, however, the Council recognises that a failure to comply with certain aspects of Regulation 3 is likely to have a much bigger impact on the safety and comfort of residents than others.

### ***Failure to comply with Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 sections (3)(b), 3(d), 3(e)***

The Council would view the seriousness of the offence of failing to comply with (3)(b), 3(d) or 3(e) of Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 as a mild matter, attracting a financial penalty with a starting level of £2,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £2,000, attracting a civil penalty of £500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £2,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £2,000, attracting a civil penalty of £4,500.

### ***Aggravating features/factors specific to Electrical Safety Regulations breaches of duty***

- The number and/or nature and/or extent of the Electrical Safety Regulation breach(es) within each sub-regulation.
- Using an unqualified person lacking appropriate certification to carry out inspection, testing, investigative or remedial work.

### ***Generic aggravating features/factors***

As set out under 'Failure to comply with an Improvement Notice' above.

### ***Failure to comply with Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 sections (1)(a), (1)(b), (1)(c), (3)(a), (3)(c), (5)(b), (5)(c)***



## Annex A

The Council would view the seriousness of the offence of failing to comply with (1)(a), (1)(b), (1)(c), (3)(a), (3)(c), (5)(b) or (5)(c) of Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 as a Serious matter, attracting a financial penalty with a starting level of £12,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £7,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £12,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5,000, attracting a civil penalty of £17,500.

### *Aggravating features/factors specific to Electrical Safety Regulations breaches of duty*

- The number and/or nature and/or extent of the Electrical Safety Regulation breach(es) within each sub-regulation.
- Using an unqualified person lacking appropriate certification to carry out inspection, testing, investigative or remedial work.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

### ***Failure to comply with Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 sections (4), (5a), (6)***

The Council would view the seriousness of the offence of failing to comply with (4), (5a) or (6) of Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 as a Very Serious matter, attracting a financial penalty with a starting level of £17,500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5,000, attracting a civil penalty of £12,500.

## Annex A

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £17,500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5,000, attracting a civil penalty of £22,500.

### *Aggravating features/factors specific to Electrical Safety Regulations breaches of duty*

- The number and/or nature and/or extent of the Electrical Safety Regulation breach(es) within each sub-regulation.
- Using an unqualified person lacking appropriate certification to carry out inspection, testing, investigative or remedial work.

### *Generic aggravating features/factors*

As set out under 'Failure to comply with an Improvement Notice' above.

## **Process for imposing a civil penalty and the right to make representations**

Before imposing a financial penalty on a person, the Council will give the person a Notice of Intent.

A person who is given a Notice of Intent may make written representations to the Council about the proposal to impose a financial penalty. Any representations must be made within a 28-day period, this period starting the day after the date on which the Notice of Intent was given. As the burden lies with the recipient of any such notice to explain why, exceptionally, the Council should, or should not, depart from the Civil Penalties Matrix and guidance above, the Council will expect the recipient of a Notice of Intent to explain and provide fulsome and cogent evidence to support the existence of any such circumstances when they make representations in response to the notice.

## **Annex A**

In the event of two or more persons receiving separate Notices of Intent for the same matter, it should be noted that acceptance/payment of a civil penalty by one person will not negate the Council's intention to impose a civil penalty on the second or further persons. Each person served with the Notice of Intent is considered individually liable to pay the civil penalty notified to them. It is therefore important that any recipient of a Notice of Intent takes the opportunity to make representations should they consider for any reason a civil penalty should not be individually imposed upon them.

After the end of the period for representations the Council will:

- (a) Decide whether to impose a financial penalty on the person, and
- (b) If it decides to impose a financial penalty, decide the amount of the penalty

In determining whether to impose a financial penalty, and the level of any penalty, the Council will consider any written representations received in the appropriate time period and will also consider the totality principle.

Furthermore, an offender's compliance with the identified breach during the representation period would not, in itself, be reason for the Council to determine that the imposition of a financial penalty was inappropriate. However, compliance at that stage may be relevant with respect to any mitigating factors that could decrease the amount of any imposed financial penalty.

If, following the receipt of written representations and/or the expiry of the time period to make written representations, the Council decides to impose a financial penalty on the person, it will give the person a Final Notice imposing that penalty.

The Final Notice will set out and summarise:

- a) The amount of the financial penalty,
- b) The reasons for imposing the penalty,
- c) Information about how to pay the penalty,
- d) The period for payment of the penalty,
- e) Information about rights of appeal, and
- f) The consequences of failure to comply with the notice

## **Discounts**

The Council will automatically apply the following discounted rates to any imposed financial penalties in the following circumstances:

## Annex A

- A discount of 15% of the original calculated financial penalty will be deducted from the penalty imposed in the Final Notice should the penalty be paid within a specified time period (normally 28 days).

### *Illustrative example*

The landlord of a Mandatory HMO property fails to obtain a licence. They only operate two HMO properties and there are no other relevant factors or aggravating features. The offence is regarded as a very serious matter. Upon receipt of the 'Notice of Intent' to impose a £17,500 financial penalty, written representations are made to the Council.

On account of the written representations received from the landlord, the council imposes a financial penalty of £16,000. In the event the landlord pays within the specified period a 15% discount is given so that the landlord makes a discounted payment of £13,600.



**COTSWOLD**  
District Council

## **HMO Amenity Standards**



**Guidance for Landlords on the Standards  
Required for Space and Amenities in  
Houses of Multiple Occupation**

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## Introduction

This guidance sets out standards for Houses in Multiple Occupation (HMO), these standards are based on legislative requirements and relevant guidance, as well as the Council's expectations.

All HMOs, whether requiring a licence or not, are required to meet relevant fire safety, health and safety, and space and amenity standards.

The property remains the responsibility of the landlord, manager and/or owner and the Council accepts no responsibility for any loss caused as a result of application of these standards.

The Council has the power to enforce but encourages landlords to meet the standards proactively.

## What is a House in Multiple Occupation (HMO)

An HMO is property occupied by 3 or more people, forming more than one household, who share toilet, bathroom or kitchen facilities. Exclusive use bathrooms/ensuites and/or cooking facilities, and self-contained flats in some cases, may also form part of an HMO. The full definition is provided by the [Housing Act 2004, sections 254 to 260](#). Traditionally HMOs are let as 'bedsit' type where rooms in a property are let on individual agreements and the occupiers share other facilities. HMOs let on a single tenancy agreement and occupied by an identifiable group of people such as students, work colleagues or friends may be considered a 'shared house'.

## Unsure whether your property is an HMO?

If you are unsure or have any other queries regarding HMOs, please contact the Private Sector Housing Team, at: [ers@publicagroup.uk](mailto:ers@publicagroup.uk).

## Managing an HMO

All HMOs, whether requiring a licence or not, must be managed in compliance with [The Management of Houses in Multiple Occupation \(England\) Regulations 2006](#).

## Licensing an HMO

All HMOs occupied by 5 or more people require a mandatory HMO Licence; the licence holder and manager must be fit and proper; see [Housing Act 2004, s.66](#). There is no minimum age applied when calculating HMO occupiers; children count as an occupier from birth. See also the [Licensing of Houses in Multiple Occupation \(Mandatory Conditions of Licences\) \(England\) Regulations 2018](#).

## How to apply and further information

More information about HMOs, including how to apply for an HMO Licence and the licence fees can be found here: [Cotswold District Council - Apply for a licence](#).

## HMO Licensing offences and penalties

Offences in relation to licensing of HMOs are described in [section 72](#). Offences include:

- not having a licence for a property that requires one;
- allowing occupation of an HMO over the number of people permitted;
- failing to comply with any conditions of the licence.

If you control or manage an HMO requiring a licence, but you don't have a licence, you could get an unlimited fine. If you breach a condition of an HMO licence you could be fined up to £5,000 upon conviction. Local authorities are also able to issue landlords with civil penalty notices of up to **£30,000 per offence** as an alternative to prosecution.



## Section 1: Standards for all types of HMO

This section provides guidance on the standards which apply to all types of HMO.

### 1.1 Fire Safety

There is a significantly higher risk of fire in HMOs compared to other types of accommodation.

A higher level of fire safety provisions is therefore essential to ensure adequate means of escape in the event of a fire, including a suitable fire detection and alarm system and protected escape route.

The [LACORS 'Housing – Fire Safety' guide](#) is referred to by the Council and the Gloucestershire Fire and Rescue Service in relation to the fire safety provisions for HMOs and is a good reference for landlords and developers. As properties vary, the standards for each individual property will be determined following an inspection by the Private Sector Housing Team.

All HMOs require fire detection/alarms throughout the escape route, in kitchens and in the principal habitable room. Bedsit type HMOs also require detection/alarms in all risk rooms – this includes letting rooms, communal areas such as lounges and dining rooms and may include cupboards if they open on to the escape route. It is recognised shared houses can present a lower fire risk than traditional bedsit-type HMOs. The occupation, fire safety risk and therefore the required fire safety precautions, will need to be assessed for each individual property based on how it is occupied and used. Final exit doors and doors to individual lettings must be openable from the inside without the use of a key.

The [Regulatory Reform \(Fire Safety\) Order 2005](#) and [Fire Safety Act 2021](#) requires a suitable and sufficient fire risk assessment to be carried out; this is regulated by the fire service. However, a copy of the assessment must be submitted as part of a licence application.

### 1.2 Heating

The heating system must be fixed and controllable, of an appropriate design and layout to efficiently heat the whole property. As a minimum it must be capable of maintaining the following temperatures when the outside temperature is -1°C: Reception rooms 21°C, Kitchens 21°C, Bedrooms 18°C, Bathrooms 22°C, Hallways 19°C.

All common parts, units of sleeping accommodation and bathrooms/shower rooms (whether shared or exclusive use) must be fitted with suitable fixed and controllable heating.

Heating must always be available, and the occupiers must be able to adjust the controls for their accommodation, for example via a thermostatic radiator valve (TRV).

The heating system provided must meet the above requirements without the use of any additional heating, such as any type of portable heater.

The HMO must not be fitted with any pre-payment meters. The manager must not unreasonably cause the gas or electricity supply that is used by any occupier within the HMO to be interrupted.

The use of any portable paraffin, oil-fired, liquefied petroleum gas heaters (LPG) (bottled gas heaters), or any other open-flame heat source (whether portable or fixed, such as an open fire or wood-burner) are not acceptable in an HMO under any circumstances, whether provided by the landlord or tenant.

### 1.3 Natural and Artificial Lighting

All units of accommodation shall have an adequate level of natural light, provided by clear glazed window(s) and/or door(s). The glazed area to be equivalent to at least 1/10th of the floor area,

e.g. in a 10m<sup>2</sup> room the glazed area must be a minimum of 1m<sup>2</sup>. Windows to bathrooms, shower rooms and toilets are to be glazed with obscured glazing.

All areas of the property accessible by the occupiers must have adequate electric lighting, controlled by suitably located switches. Lighting on stairs should be capable of being switched on and off from both upstairs and downstairs. Lighting on stairs, landings and passages can be controlled by timer switches and/or passive infra-red (PIR) sensors. Any timers must be set appropriately for the layout of the property, i.e. not unreasonably short.

### 1.4 Ventilation

All units of accommodation shall be ventilated directly to the external air by a window; a door alone is not suitable. The window shall have an openable area of at least 1/20th of the floor area of that room, e.g. in a 10m<sup>2</sup> room the openable window area must be a minimum of 0.5m<sup>2</sup>.

Kitchens, bath/shower rooms and toilets where there is no natural ventilation, or the natural ventilation is not adequate, shall have mechanical ventilation fitted in accordance with current Building Regulations. Mechanical ventilation to meet this requirement must be externally vented. **Humidistat controlled ventilation is highly recommended.**

Consideration should be given to where occupiers can dry clothes to minimise the likelihood of condensation and the risk of associated mould growth. Where provided, tumble driers must be appropriately installed and ventilated.

### 1.5 Furniture Safety

[The Furniture and Furnishings \(Fire\)\(Safety\) Regulations 1988 \(as amended\)](#) sets out the standards required. Furniture provided must comply with these regulations and landlords, letting and management agents are responsible for ensuring all furniture provided is compliant.

### 1.6 Security

Sufficient measures must be in place to provide security for the occupiers, including appropriate locks to the front entrance door, rear exit doors and units of accommodation,

to prevent unauthorised access but permit safe keyless exit; there must be no locks that are key operated from the inside along any part of the escape route, both internally and externally.

Vulnerable windows must be capable of being secured against unauthorised access without compromising the means of escape in case of fire. Simple locks must be provided to the bath/shower rooms and toilet to provide privacy.

## **1.7 Electrical Safety**

All sockets shall be positioned for safe, convenient, and proper use, having regard to the room layout to prevent overloading of sockets and trip hazards from trailing cables. See the following sections for minimum requirements. There must be an Electrical Installation Condition Report (EICR) showing a 'satisfactory' result. See also section **2.2 Electrical Safety Regulations**.

Electrical Equipment Testing (EET), previously called Portable Appliance Testing (PAT), must be carried out on all testable electrical appliances provided by the landlord, that are more than 12-months old, at least once every year.

## **1.8 Refuse, Storage and Disposal**

Refuse and recycling bins or containers must be provided and meet the needs of the HMO, with waste separated as required by the Council. Wherever possible, they must not be located near windows or doors to habitable rooms. They must not cause obstruction to any private or public access including the HMO and neighbours; and must be stored and put out for collection in accordance with the Council's waste and recycling scheme, for more information see:

[Bins and Recycling](#) .

## Section 2: Legal requirements for all HMOs

It is the landlord/manager and/or property owner's responsibility to ensure compliance with relevant legislation and regulations, including staying up to date with any changes. This section provides some guidance on these obligations; it is a summary and is not exhaustive. If in any doubt regarding your legal obligations, you are advised to seek independent legal advice.

### 2.1 Gas Safety and Carbon Monoxide

[The Gas Safety \(Installation and Use\) Regulations 1998](#) requires the landlord to ensure that where a rented property contains gas appliances, they are maintained in good order and checked for safety at least annually. A record of the checks (Gas Safety Record) must be kept, a copy given to the tenants and shown to the local authority on request.

[The Smoke and Carbon Monoxide Alarm \(Amendment\) Regulations 2022 \(which amends the 2015 Regulations\)](#), requires a Carbon Monoxide (CO) alarm is installed in any room of the premises which is used wholly or partly as living accommodation (including bathrooms and toilets) and contains a fixed combustion appliance other than a gas cooker, e.g. a gas fired boiler.

The standard for fire detection in most HMOs is higher than these regulations describe – see section **1.1 Fire Safety**. If you are found to be in breach of the Smoke and Carbon Monoxide Alarm Regulations, the Council can issue a penalty of up to £5,000.

### 2.2 Electrical Safety Regulations

[The Electrical Safety Standards in the Private Rented Sector \(England\) Regulations 2020](#) require landlords to have electrical installations in their properties inspected and tested by a person who is qualified and competent, at least every 5 years. Landlords will provide a copy of the report, usually an Electrical Installation Condition Report (EICR), to their tenants at the start of the tenancy and to the local authority when requested. If you are found to be in breach of these regulations the local authority can impose a financial penalty of up to £30,000.

See also **1.7 Electrical Safety**.

### 2.3 Housing Health and Safety Rating System

The Housing Health and Safety Rating System (HHSRS) is a method of assessing hazards, it is enforced by the Housing Act 2004. HHSRS guidance for landlords is here: [Housing health and safety rating system: guidance for landlords and property-related professionals](#).

HHSRS applies to all dwellings, regardless of tenure. If significant hazards are identified, the Council may take enforcement action to reduce or remove hazards to an acceptable level; enforcement action must be taken where category 1 hazards are identified. A breach of enforcement action is an offence for which you can be prosecuted or a civil penalty of up to £30,000 can be imposed.

## 2.4 HMO Management Regulations

There are management regulations that apply to all HMOs. The person in control of or managing the HMO has duties under these regulations. [The Management of Houses in Multiple Occupation \(England\) Regulations 2006](#) apply to all HMOs except those consisting entirely of self-contained flats, to which the following apply: [Licensing and Management of Houses in Multiple Occupation \(Additional Provisions\) \(England\) Regulations 2007](#). A breach of management regulations is an offence for which you can be prosecuted or a civil penalty of up to £30,000 can be imposed.

## Section 3: HMO Licensing

Mandatory licensing applies under [Part 2 of the Housing Act 2004](#) to HMOs with 5 or more occupiers; this means if you are responsible for an HMO requiring a licence, you must apply.

### 3.1 Who is responsible?

You are responsible for applying for an HMO licence;

If you own or lease a property which is subject to mandatory licensing, and you receive rent (either collected directly or by an agent) from tenants or licensees,

or, you receive the 'rack-rent' (two-thirds or more of the full net annual value of the rent) from a property which is subject to mandatory licensing. This includes tenants who sublet.

Operating an HMO that is subject to mandatory licensing without a licence (unless you have submitted a valid application) is a criminal offence, for which you may be prosecuted or receive a civil penalty of up to £30,000.

### 3.2 How do I apply?

**Link to apply for an HMO Licence:**

[Cotswold District Council - Apply for a licence.](#)

If you have any trouble making an application, contact us at: [ers@publicagroup.uk](mailto:ers@publicagroup.uk).

## Section 4: Space and amenity standards for HMOs

The sizes and facilities specified are in most cases what the Council expects to be provided. However, depending on how the property is occupied, the layout, including communal space provision, and any other details specific to the property, some exceptions may be made. Assessment regarding any exception can only be made on a case-by-case basis. All amenities must be accessible internally, any external amenities will be excluded, e.g. outside toilets are excluded.

The sizes given refer to floor area. Any floor area where the ceiling height is less than 1.5m will not be included. At least 75% of the room must have a ceiling height of at least 2.1m.

For the purposes of determining the maximum permitted numbers of occupants for an HMO, the Council will have regard to the:

- [Bedrooms, including the sizes of the rooms.](#)
- [Bathrooms, toilets and personal washing facilities.](#)
- [Kitchens, cooking and food preparation facilities.](#)
- [Mandatory licence conditions.](#)

### 4.1 Bedrooms (sleeping accommodation)

The term 'bedroom' refers to any room used as sleeping accommodation, whether it is also used for other purposes. The areas detailed below refer to floor area and do not include enclosed areas such as en-suites. The floor area in rooms with unusual layouts will be

assessed on a case-by-case basis and must be fit for purpose; for example, narrow entrances/hallways may be excluded from the floor area; built-in furniture or walk-in floor to ceiling cupboards, may be included. No other room or space shall count towards the floor area.

Number of occupiers	Bedroom	Bedroom with cooking facilities in the same room
One person	8 sqm	11 sqm
Two persons	13 sqm	16 sqm

Some smaller rooms maybe permitted but should not form the majority of the HMO. Generally, where there are smaller rooms some addition communal space should be provided, such as a dining area (either as part of the kitchen or a separate room), or a lounge. In any case, bedrooms which also contain cooking facilities must be safe to use; see **Exclusive use kitchens**.

Any room below the statutory minimum size must not be used as sleeping accommodation.

The statutory minimums are described by the [Licensing of Houses in Multiple Occupation \(Mandatory Conditions of Licences\) \(England\) Regulations 2018](#) and are as follows:

One child under the age of 10 years	4.64 sqm
One person aged 10 years or over	6.51 sqm
Two persons aged 10 years or over	10.22 sqm

All bedrooms must be provided with a minimum of four electrical sockets (or equivalent, e.g. two double sockets), which must be easily accessible and suitably located to not have trailing leads, nor require extension leads – inaccessible sockets will be disregarded.

## 4.2 Bathrooms, toilets and personal washing

All baths, showers and wash-hand basins must be equipped to provide an adequate supply of cold and constant hot water and must be fit for purpose.

**Exclusive use facilities** may also be provided, either within the letting as an ensuite which must be enclosed, or in a separate enclosed room ideally on the same floor. They must contain a toilet, wash-hand basin and a bath or fixed shower for the users not to count towards the number of occupiers sharing in the table below.

All bathrooms, shower-rooms and toilets, whether exclusive use or shared – which must be accessible from a common area – must be of adequate size and layout, be no more than one floor from any letting expected to use them, be provided with a suitable decorative finish which is capable of being kept in a clean and hygienic condition; in shared facilities cleaning is the manager's responsibility as it is in all common parts. Exclusive use facilities must be clean at the start of each occupancy. Suitable ventilation is required, see **Section 1.4 Ventilation**.

Occupiers	Facilities required
3 to 4	One bathroom containing a bath or shower, and a wash-hand basin. One toilet, which can be included in the bathroom.
5	One bathroom containing a bath or shower, and a wash-hand basin. One toilet with a wash-hand basin, which must be separate from the bathroom.
6 to 7	Two bathrooms each containing a bath or shower, and a wash-hand basin. Two toilets, which can be included in the bathrooms.
8 to 10	Two bathrooms each containing a bath or shower, and a wash-hand basin. Two toilets, one of which can be included in a bathroom, the other must be in a separate compartment with a wash-hand basin.
Each 5 additional persons	One additional bathroom containing a bath or shower, and a wash-hand basin. One additional toilet; at least half of the total number of toilets must be in a separate compartment with a wash-hand basin.

### 4.3 Kitchens and cooking facilities

All kitchens should meet or exceed the minimum sizes and facility standards described below, be provided with a suitably located fire blanket, an adequate supply of cold and constant hot water to each sink, have a layout allowing safe and convenient use and be provided with decorative finish and surfaces which are capable of being kept in a clean and hygienic condition. In shared facilities cleaning is the manager's responsibility as it is in all common parts. Exclusive use facilities must be clean and in good condition at the start of each occupancy.

Where there is no dining area within or adjacent to the kitchen, kitchen facilities must be sited no more than one floor distance from each letting.

Occupiers	Kitchen	Kitchen-Diner
3 to 4	6 sqm	10 sqm
5 to 7	9 sqm	13 sqm
8 to 10	12 sqm	16 sqm

### Shared kitchens

Shared kitchens must be accessible from a common area and must be equipped with facilities suitable for the number of occupiers. The facilities described for up to 5 persons is the minimum requirement for a shared kitchen.

No one kitchen shall provide for more than 10 persons.



Facilities	Up to 5 persons	6 to 7 persons	8 to 10 persons
Cooking	4 rings 1 oven and grill.	As 5 persons plus; combination microwave oven/grill.  Or, 6 rings 2 ovens and grill.	As 5 persons plus; 4 rings, 1 oven and grill. Or, 6 rings 2 ovens and grill and combination microwave oven/grill.
Sink	1	1.5 or 1 plus dishwasher	2 or 1 plus dishwasher
Worktop	1500mm x 600mm	2000mm x 600mm	2500mm x 600mm
Electrical sockets	4	6	8
Storage	0.2 m <sup>3</sup> per person, approx. one 600mm base unit or one 1000mm wall unit.		
Fridge/Freezer	30 litres fridge space and 15 litres freezer space per person.		
Refuse disposal	Suitable covered refuse disposal facilities ~ approx. 10 litres per person. e.g., where 5 occupants share a kitchen; a 50-litre bin is required.		
Ventilation	See <a href="#">Section 1.4 Ventilation</a> .		

### Cooking:

**Rings** – can be gas or electric, they must be provided as a fixed hob or part of a freestanding cooker, portable hobs are not acceptable. The hob/cooker is to be located away from doorways with a minimum of 300mm worktop to both sides.

**Ovens and grills** – may be provided as integrated units or as part of a freestanding cooker; they must not be worktop appliances.

**Combination microwave oven/grills** – can be a worktop appliance; a microwave without oven/grill functions does not meet this requirement.

**Sink** – minimum bowl sizes: full 350mm x 350mm, half 150mm x 300mm, must be suitably installed, intended for kitchen use and include a draining board – if undermounted, see below.

**Worktop** – A worktop of smooth and impervious material. The stated sizes, or equivalent area, refers to clear worktop space to be available for food preparation, space taken up by any appliances, such as those required above, will not be included. If an undermounted sink is installed an additional 500mm of worktop must be provided in-lieu of a draining board.

**Electrical sockets** – numbered as single sockets, e.g. 6 = 3 double sockets, can be provided in any configuration of single/double sockets. They must be suitably spaced and

located; to be fitted above worktop height and in addition to any used for fixed and/or other appliances, such as any 'white goods' or any appliances required above. Sockets for these appliances may be low level.

**Storage** – Drawers may count towards the space required but should not be the majority of any one person's storage. Space in a unit below a sink will not be counted but may be used for storage of cleaning materials etc. If kitchen space is limited, this may be provided within letting rooms.

Cupboard/drawer space should be allocated to lettings.

It is recognised cupboard sizes can vary depending on kitchen size/shape, allowances may be made to allow some storage space down to 0.15 m<sup>3</sup>, but the majority must meet the requirement.

**Fridge/freezer** – in addition to the minimum space, at least one fridge shelf and half a freezer shelf shall ordinarily be allocated per person. They can be provided in an adjacent and readily accessible position, **not in the escape route**.

Exclusive use fridge/freezers located in lettings can count towards this requirement, however there must still be a 'tall' combined fridge/freezer provided in the shared kitchen – if undercounter size there must be at least one of each, fridge and freezer. If a mix of exclusive use and shared fridges/freezers are provided, there must be some unallocated shared space available for use by all as and when needed, at least equivalent to the space required for one person.

### Exclusive use kitchens

These may be within the same room as the bedroom/living accommodation or in another room.

If provided within the same room, it must have a layout which allows safe use of the facilities and clear escape in the event of a fire. It is preferable to have the cooking facilities located so that they are not between the living/sleeping areas; if this is not the case, additional fire safety provisions, for example, a secondary means of escape or fire suppression, will be required.

Facilities	Per unit of accommodation, maximum 2 persons
Cooking	2 rings (fixed position) and either; an oven and grill (can be suitably located mini oven/worktop type) or, combination microwave oven/grill.
Sink	1 full bowl sink – see <b>Sink</b> above.
Worktop	1000mm x 600mm – see <b>Worktop</b> above.
Electrical sockets	4 – see Electrical Sockets above
Storage	0.2 m <sup>3</sup> per person, approx. one 600mm base unit or one 1000mm wall unit.

Fridge/ Freezer	30 litres fridge space and 15 litres freezer space per person – see <b>Fridge/freezer</b> above
Refuse disposal	Suitable covered refuse disposal facilities ~10 litres per person.
Ventilation	See <a href="#">Section 1.4 Ventilation</a> .

## Section 5: Other considerations

The below is not exhaustive, there may be other considerations, legal or otherwise. Ultimately if you are the responsible party, it is your responsibility to ensure you are complying with all relevant legislation, regulations and any other applicable requirements.

### 5.1 Planning Permission

Planning permission is required for all HMOs with 7 or more occupiers and may be necessary for operation of the premises as an HMO. Compliance with the standards in this guide and/or the granting of an HMO licence does not imply that planning permission would be approved.

Enquiries regarding planning permission should be made to: [planning@cotswold.gov.uk](mailto:planning@cotswold.gov.uk) or call on 01594 810000. Further information can be found here: [Planning Permission, Cotswold DC](#)

### 5.2 Building Regulations

Where new building work is being carried out a Building Regulations application may be required. If you have any queries regarding Building Regulations or are in any doubt as to whether an application is needed, please contact Building Control at:

[building.control@cotswold.gov.uk](mailto:building.control@cotswold.gov.uk) or call them on 01594 812315.

Further information can be found here: [Building regulations – Cotswold DC](#)

### 5.3 Section 257 HMOs

A Section 257 HMO is defined in the [Housing Act 2004, section 257](#). In short, it is a building or part of a building that has been converted into fully self-contained flats (units of accommodation containing a toilet, personal washing and cooking facilities); where the conversion does not meet the appropriate Building Regulations and of which fewer than two-thirds are owner-occupied.

See also the [Licensing and Management of Houses in Multiple Occupation \(Additional Provisions\) \(England\) Regulations 2007](#).

### 5.4 Property Redress Schemes

If you are managing a property which you don't also own, it is likely you are carrying out 'property management work' and therefore must be a member of a property redress scheme. You can find more information about membership and the two schemes available here:

[www.gov.uk/government/publications/lettings-agents-and-property-managers-redress-schemes](http://www.gov.uk/government/publications/lettings-agents-and-property-managers-redress-schemes)

### 5.5 Illegal Eviction and Harassment

It is a criminal offence to unlawfully evict or harass your tenant. If found guilty of these offences, you could be imprisoned for up to 2 years and/or given an unlimited fine.

For further information see the following:

[Evicting tenants in England: Overview](#)

[Evicting tenants in England: Harassment and illegal evictions](#)

# Private Sector Housing



**COTSWOLD**  
District Council

[www.cotswold.gov.uk](http://www.cotswold.gov.uk)

**Trinity Road, Cirencester, GL7**

**Resident Services**  
**ers@publicagroup.uk**  
**[www.cotswold.gov.uk](http://www.cotswold.gov.uk)**

**August 2025**

### Equality and Rurality Impact Assessment Form

When completing this form you will need to provide evidence that you have considered how the 'protected characteristics' may be impacted upon by this decision. In line with the General Equality Duty the Council must, in the exercise of its functions, have due regard for the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This form should be completed in conjunction with the guidance document available on the Intranet

Once completed a copy should be emailed to [cheryl.sloan@publicagroup.uk](mailto:cheryl.sloan@publicagroup.uk) to be signed off by an equalities officer before being published.

1. Persons responsible for this assessment:

Names: Philip Measures	
Date of assessment: 01/08/25	Telephone: Email: <a href="mailto:philip.measures@publicagroup.uk">philip.measures@publicagroup.uk</a>

2. Name of the policy, service, strategy, procedure or function:

HMO Amenities Standards Policy The Civil Penalties Enforcement Policy
--

3. Briefly describe it aims and objectives

This report reviews policies concerning private sector housing. The update is required to take account of legislative changes and to take into account new guidance and Tribunal decisions.
---

4. Are there any external considerations? (e.g. Legislation/government directives)

The Housing Act 2004 The Housing and Planning Act 2016
---

LACORS guidance  
 Ist Tier Property Tribunal decisions  
 The Renters Rights Bill. This legislation currently passing through both houses, introduces new standards and expectations on Councils in the delivery of their Private Sector Housing duties.

5. What evidence has helped to inform this assessment?

Source	✓	If ticked please explain what
Demographic data and other statistics, including census findings	✓	Private Sector Housing Stock Conditions Survey.
Recent research findings including studies of deprivation	<input type="checkbox"/>	
Results of recent consultations and surveys	<input type="checkbox"/>	
Results of ethnic monitoring data and any equalities data	<input type="checkbox"/>	
Anecdotal information from groups and agencies within Gloucestershire	<input type="checkbox"/>	
Comparisons between similar functions / policies elsewhere	<input type="checkbox"/>	
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	✓	1st Tier Property Tribunal decisions, meaning the current Private Sector Housing policies are out of date.

6. Please specify how intend to gather evidence to fill any gaps identified above:

n/a



## 7. Has any consultation been carried out?

No

If NO please outline any planned activities

None are scheduled, but newsletters and comms are going to be planned. Dependant on the availability of resources, a Landlord's forum could be scheduled.

## 8. What level of impact either directly or indirectly will the proposal have upon the general public / staff? (Please quantify where possible)

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	✓
LOW – Few members of the general public/staff will be affected by this proposal	<input type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>
The policy renews an existing, so the impact should be positive. Landlords who are non-complaint, may face additional sanctions as a result of this policy being in place.	

## 9. Considering the available evidence, what type of impact could this function have on any of the protected characteristics?

*Negative – it could disadvantage and therefore potentially not meet the General Equality duty;**Positive – it could benefit and help meet the General Equality duty;**Neutral – neither positive nor negative impact / Not sure*

	Potential Negative	Potential Positive	Neutral	Reasons	Options for mitigating adverse impacts
Age – Young People			✓	The policy is concerned with the regulation of conditions in private sector housing, for the benefit of all residents. It does not introduce anything new that would have either a positive or negative impact on individuals with protected characteristics.	
Age – Old People			✓		
Disability			✓		
Sex – Male			✓		
Sex – Female			✓		
Race including Gypsy and Travellers			✓		
Religion or Belief			✓		
Sexual Orientation			✓		
Gender Reassignment			✓		
Pregnancy and maternity			✓		
Geographical impacts on one area			✓		
Other Groups			✓		
<b>Rural considerations:</b> ie Access to services; leisure facilities, transport; education; employment; broadband.			✓		

10. Action plan (add additional lines if necessary)


Action(s)	Lead Officer	Resource	Timescale
n/a			

11. Is there is anything else that you wish to add?

No

**Declaration**

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where a negative impact has been identified actions have been developed to lessen or negate this impact. We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

Completed By:		Date:	
Line Manager:	Phil Measures	Date:	01/08/25
Reviewed by Corporate Equality Officer:		Date:	04/08/2025

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**COTSWOLD**  
District Council

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET 4 SEPTEMBER 2025</b>
Subject	<b>CORPORATE PLAN - REFRESH 2025-28</b>
Wards affected	All
Accountable member	Mike Evemy, Leader of the Council Email: <a href="mailto:Mike.Evemy@Cotswold.gov.uk">Mike.Evemy@Cotswold.gov.uk</a>
Accountable officer	Jane Portman, Chief Executive Officer, Email: <a href="mailto:jane.portman@Cotswold.gov.uk">jane.portman@Cotswold.gov.uk</a>
Report author	Joseph Walker, Head of Economic Development and Communities Email: <a href="mailto:Joseph.Walker@Cotswold.gov.uk">Joseph.Walker@Cotswold.gov.uk</a>
Summary/Purpose	To seek Cabinet's endorsement of a refreshed Corporate Plan for the period 2025 through to 2028. While the extant Corporate Plan was agreed last year, there have been significant changes nationally and locally which are reflected in the refreshed plan.
Annexes	Annex A – Draft Corporate Plan Annex B – Refreshed Action Plan
Recommendation(s)	That Cabinet resolves to: <ol style="list-style-type: none"> <li>1. Review the appended Corporate Plan 2025-2028 and agree any modifications</li> <li>2. Subject to modifications, agree to recommend to Full Council to adopt the Plan.</li> <li>3. Delegate authority to the Chief Executive Officer, in consultation with Leader, to finalise the design.</li> </ol>
Corporate priorities	The Corporate Plan determines the Council's Corporate Priorities. The draft attached reaffirms the Council's existing priorities, but adds a further priority, 'Preparing for the future'.
Key Decision	Yes



# COTSWOLD

District Council

Exempt	NO
Consultees/ Consultation	Cabinet, via away days and Informal Cabinet meetings



## **1. EXECUTIVE SUMMARY**

- 1.1** This report presents a revised Corporate Plan for the Council. The current plan and appended action plan were agreed early in 2024, but given the impending changes to local government structures it is vital to reflect these new challenges, and ensure appropriate political oversight of the Council's direction of travel.

## **2. BACKGROUND**

- 2.1** Since the adoption of the current Corporate Plan and Action Plan there have been significant changes to the Council's operating environment. There was a General Election in July 2024, leading to a change in national government. In December, we saw the publication of a revised National Planning Policy Framework – and a significantly increased and mandated housing target. The Government also published the English Devolution White Paper, which alongside proposing Strategic mayoral Authorities, also proposes the end of two tier (County/District) local government, and the establishment of new unitary councils. This is a seismic change for Gloucestershire, and for Cotswold District Council, and will be a major work commitment in the coming years as the Council works with partners to design and establish a successor council.
- 2.2** Locally, the Council has seen the transfer in of services from Publica, and changes in administrative and political leadership. Viewing all these changes collectively, it is appropriate to review the Council's Corporate Plan and agree actions to ensure they reflect this new operating environment.

## **3. MAIN POINTS**

- 3.1** The purpose of the Corporate Plan is to set out the Council's Aim and Priorities - these are then elaborated upon with an Action Plan, explaining in detail how these will be met.
- 3.2** The refreshed Corporate Plan, attached at Annex A, builds on the aspirations and achievements of the extant Plan.
- 3.3** This reflects that in broad terms the ambitions of the Council remain consistent with those reviewed in 2024. However, the priorities have been supplemented with a further priority, 'Preparing for the future' which will encompass the Council's transformation programme, to realise savings and service improvements, and work to prepare for Local Government Reorganisation.



- 3.4** The Strategy, and the actions derived from it, also seeks to recognise the finite expected lifetime the Council now has. The Council is working to a timeline of a successor unitary authority being vested on 1 April 2028, and accordingly, Cotswold District Council delivery ceasing on 31 March 2028. The focus is on actions which can be delivered by that date, although there is also a recognition that services should continue with as little disruption or reduction in quality as possible.
- 3.5** For clarity, the refreshed priorities are therefore as follows:
- Preparing for the Future
  - Delivering Good Services
  - Responding to the Climate Emergency
  - Delivering Housing
  - Supporting Communities
  - Supporting the Economy
- 3.6** The importance of these priorities is explained in the strategy and illustrated with examples of the Council's performance against these in recent years. Towards the back of the document, these priorities are expanded into an action table, picking up the detail of actions necessary to deliver these ambitions.
- 3.7** At this stage, Cabinet is recommended to approve the Corporate Plan, including the Action Plan (Annex B) and recommend to Council for adoption. Once the content has been agreed, a design version of the strategy will be prepared, with the aim of bringing the work of the Council to life, and to enhance the accessibility for the casual reader. A delegation to the Chief Executive, in consultation with the Leader, will enable a designed version to be finalised promptly following the consideration of the strategy by Council.
- 3.8** Two Cabinet 'Away Days' were held earlier in 2025. These provided an opportunity for Cabinet Members to reflect on both the content of the extant plan and changing circumstances to inform the preparation of the attached document. This work has also been matched by a technical exercise with officers reviewing progress against agreed actions and Cabinet Members' direction to inform the refreshed actions presented.





- 3.9** The draft plan, as attached, has been shared with the Overview and Scrutiny Committee, at their meeting on 1 September. O&S Feedback will be presented at the Cabinet meeting.

**4. ALTERNATIVE OPTIONS**

- 4.1** Ensuring there is an up-to-date Corporate Plan is key to good governance and helps to ensure appropriate political oversight of the Council's direction of travel.

**5. CONCLUSIONS**

- 5.1** The attached Corporate Plan provides continuity from the current strategy yet reflects the changed circumstances in which the Council operates. Support by Cabinet will enable the Plan to go forward to Full Council, for its adoption to guide the Council's operations for the period 2025-2028.

**6. FINANCIAL IMPLICATIONS**

- 6.1** None resulting immediately from this report.

**7. LEGAL IMPLICATIONS**

- 7.1** None resulting immediately from this report.

**8. RISK ASSESSMENT**

- 8.1** This emerging document identifies the Council's priorities for the coming period, up until 2028. Not replacing the current strategy would leave the Council without an up-to-date Strategy and thus without a clear framework to guide Council decision-making during a period of significant change.

**9. EQUALITIES IMPACT**

- 9.1** None arising directly from this report. The Corporate Plan sets the strategic framework for the Council's actions. The decisions on these actions will review equalities impact in full detail.



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

- 10.1** The Council's declaration of a Climate Change Emergency and an Ecological Emergency remain at the heart of the Corporate Strategy, driving specifically identified actions and informing the delivery of services across the purview of the Council.

## **11. BACKGROUND PAPERS**

None

(END)

# Corporate Plan 2025-2028

## Foreword

Welcome to the 2025 refresh of Cotswold District Council's Corporate Plan.

In the last year, we've made great progress across a number of key projects and ambitions – and I'm proud of everything we've achieved. Against the backdrop of ongoing financial pressures – which are impacting every council in the country – we have delivered hundreds of genuinely affordable homes and brought more services back in-house to drive greater responsiveness and accountability.

We have significantly improved the scores which measure our response to tackling climate change. We have also generated funding to the tune of £1.2million for dozens of community projects, renewed a Green Economic Growth Strategy and supported economic development through management of two prosperity funds.

That's on top of keeping our promise to deliver good services in waste and recycling, planning, licensing and more.

But anyone reading this will know all too well that life doesn't stand still, and so it's sensible that we review the council's priorities to ensure that they're keeping pace with a changing world.

As you'll note reading through this document - by and large, our priorities remain the same. But we have given due consideration to how we build on recent success. And while this plan represents evolution not revolution, significant new challenges have emerged in the last year – prompting us to turn up the dial in certain areas, as well as introduce a new priority.

Central government has more than doubled the number of new houses that the district is expected to deliver with immediate effect. For a district like ours, where 80 per cent of the land is designated as National Landscape and therefore given the strongest protection against development, finding suitable locations for 1,000 new homes per year is problematic. We need more affordable homes, but we also need sustainable communities.

The government has also asked Cotswold District Council and neighbouring authorities in Gloucestershire to develop proposals for big changes to local government, which would abolish county and district councils, replacing them with one or two unitary authorities. Both of these critical changes present substantial challenge for the council.

As such, to balance the need we have in the district for more affordable homes and to support further economic growth, while ensuring housing development is proportionate and sustainable, we are forging ahead with a full update to our Local Plan, and reasserting control of the district's destiny when it comes to development.

This initiative cuts across almost all of our core priorities and will be a central focus in the coming year.

We have also added a new priority: Preparing for the future. This will ensure that as we continue to deliver against our priorities for residents *now*, we leave a lasting legacy, as the council prepares to hand over the reins to a successor authority in 2028.

This evolution of our priorities is supported by a robust action plan which we believe is ambitious but achievable. I'm excited for what lies ahead, as we work - united as one community - to leave a fitting legacy for this beautiful district as it faces a new future.

Councillor Mike Every  
Leader, Cotswold District Council

# United We Serve: Building a lasting legacy for the Cotswolds

## **Our purpose, vision, priorities and values**

Cotswold District Council is proud to serve the communities that reside in one of the UK's most iconic and cherished areas, a place revered around the world for its natural beauty and heritage.

Around 90,000 people call this district home, in more than 100 close-knit communities and parishes. They are the stewards of the beautiful, national landscape, hosts to its millions of annual visitors, and the key drivers for its continued economic development.

## **Our purpose**

As a council, we exist to provide good services that meet their needs. From planning and housing, to climate action and community wellbeing, our work is rooted in improving lives, strengthening communities, and protecting the unique character of the Cotswolds.

As we approach a period of significant change in local government, we remain focused on delivering for our communities with purpose, integrity, and ambition.

This corporate strategy recognises and embraces the challenges facing the district, and sets out our vision through to 2028, when the council is expected to be replaced as part of national plans for Local Government Reorganisation.

The strategy is underpinned by an action plan that describes in detail how we will deliver against our ambitions, and leave a lasting legacy for the district.

## **Our vision**

As we plan for the future, we are working to leave a legacy of:

- Genuinely affordable, sustainable housing
- Resilient, connected communities
- A thriving local economy
- A protected and enhanced natural environment
- Good, transparent public services

## Our values:

Everything we do is built on principles of trust, confidence and transparency, listening to the needs of our community and providing good value for money. At Cotswold District Council, we:

- put our **communities first**: their priorities are our priorities
- are **one team**: working for our residents and businesses
- are **business focussed**: ensuring efficiency, effectiveness and good value for money
- are **set up for success**: to deliver against our corporate priorities

## Our strategic priorities

Between now and 2028, the priorities we've set out to achieve this legacy are:

- Preparing for the future
- Delivering good services
- Responding to the climate emergency
- Delivering housing
- Supporting communities
- Supporting the economy

## Our commitment

As we seek to leave a lasting legacy for a new unitary authority, we will remain flexible and responsive in a world characterised by change, steadfast in our vision to continue delivering good services while enhancing and protecting communities – ensuring they're sustainable and prosperous.

## Preparing for the Future

### **Why is this important?**

The UK government has decided that Gloucestershire should be served by a unitary local government structure; that is one or two principal councils rather than the current county and district/borough/city Councils which currently serve the county. Under Government proposals, Cotswold District Council services will transfer to a successor council in April 2028. Until then, we need to work with partners to ensure our residents' needs will be met now, and into the future.

### **What will we achieve?**

Services will transfer seamlessly into a successor council, and continue to deliver effectively on behalf of Cotswold residents.

### **How will we do this?**

- **Driving organisational and cultural change to be fit for the future**
- **Preparing for Local Government Reorganisation**
- **Developing our workforce**
- **Deliver a new Local Plan**

### **What have we done?**

- We held a Town and Parish Council Summit, to ensure local councillors understand changes that are coming.
- Worked with partner councils on a programme of public engagement, the results of which will form part of a singular evidence-base that will support the development of unitary authority proposals
- Councillors and officers are collaborating counterparts at Gloucestershire councils to share information and design services, drawing on best practice within existing councils to ensure future unitary council delivery meets local needs.

#### *Cabinet Lead quote*

'The challenges that lie ahead are significant, but change brings opportunity, and I'm excited about how we plan to tackle these challenges. It's important that we work united as one community to leave a fitting legacy for this beautiful district, as it faces a new future'

Cllr Mike Every



## Delivering Good Services

### **Why is this important?**

As a council, we exist to provide vital services to our residents, businesses and visitors. We will deliver our services both effectively and efficiently, ensuring they're designed to reflect our commitment to climate change, and best value for local taxpayers.

### **What will we achieve?**

Our services will provide value for money and high standards. We will work with our contractors and partners, such as town and parish councils, to sustain valuable services, and help maintain the Cotswolds environment we are all proud of.

### **How will we do this?**

- **Ensure value for money and good standards**
- **Enhance financial resilience and make best use of our assets**
- **Play our part in maintaining and enhancing the public realm**
- **Deliver a new Local Plan**

### **What have we done?**

- In November 2024 we brought around 70 staff back in-house to the council, maximising responsiveness and democratic accountability.
- The Planning Advisory Service (PAS) Peer Review confirmed improved performance, with the Council no longer at risk of designation. A 13-point action plan is being implemented, including new enforcement processes and Biodiversity Net Gain (BNG) requirements.
- the council received strong and encouraging feedback from the Local Government Association's Corporate Peer Challenge Progress Review. The review team recognised the council's commitment to improvement, highlighting significant progress since the original 2022 review.

#### *Cabinet Lead quote*

"The services we offer ensure public safety, consumer protection, and support local businesses, while waste and recycling collection also forms a big part of what we do. We will focus on improved communication with residents around our waste service, in a bid to continually reduce missed collections. We will evolve our services by

adapting our them to meet both new legislative requirements and the needs of users.”

Cllr Andrea Pellegram

“As every council in the country comes under continuous financial pressure, we know we have a clear responsibility to deliver good value for money, ensure financial resilience, and to manage the district’s public purse with utmost care and consideration.”

Cllr Patrick Coleman

Responding to the Climate Emergency

**Why is this important?**

Minimising and adapting to the effects of climate change are priorities for everyone. The science is settled; global warming is a consequence of human activity, and greenhouse gas emissions must be cut to net zero. All major international agencies now agree that climate change, and the associated biodiversity crisis, is the biggest threat to life on Earth. Achieving the necessary reduction in greenhouse gas emissions and delivering nature recovery not only impacts us, it requires everything we do to change – from transport and energy generation to food production and the way we use energy in our homes and workplaces.

### **What will we achieve?**

Though our success will play out over a long period, everyone will benefit from a decarbonised, healthier society, and a more resilient natural environment. In the short term there will be cost savings for residents and businesses, as well as employment and investment benefits.

Our commitment to electric vehicle charging points and renewable energy installations will ensure residents, businesses and visitors can transition to and use hybrid and electric vehicles in the Cotswold district.

### **How will we do this?**

- **Support and enable residents and businesses to reduce their own carbon emissions**
- **Decarbonise council operations**
- **Increase resilience to the effect of climate change**
- **Deliver a new Local Plan with policies that are 'green to the core'**

## What have we done?

- Carbon emissions have reduced 41% against the 1990 baseline year, from 4.7million kg CO2e in 1990 to 2.76million kg CO2e in the year 2022 to 2023.
- The council has agreed to install 26 electric vehicle charging points in its car parks in Tetbury, Cirencester, Stow-on-the-Wold and Moreton in Marsh. Of the 150 publicly accessible EV chargers across the district, the council has installed 49
- The council had almost doubled its climate score according to Climate Emergency UK, placing it in the top 15% of district councils nationwide and second in Gloucestershire for climate improvement.
- The council is helping residents to install solar panels through the Cotswold Home Solar scheme. This has already led to solar panels being installed at 27 homes, and installation is underway at a further 18 homes, on track to collectively save £450,000.

### *Cabinet Lead quote*

'We've established a cross-portfolio Climate Board, ensuring every cabinet member and senior officer is accountable for climate action in their portfolio. This ensures that we integrate climate objectives into all services provided by the council, and consider climate as part of, project approvals, and performance reviews. This will support greater decarbonisation of Council operations, while helping empowering residents and businesses to take action, too.'

Cllr Mike McKeown

# Delivering Housing

## **Why is this important?**

Cotswold is at the centre of a housing affordability crisis. The gap between earnings and house prices is one of the highest in the country, and there is a shortage of good quality, genuinely affordable housing to rent. As of May 2025, the average property price in the Cotswold district was £419,000, which is substantially higher than the UK average of £269,000, and more than 14 times the average salary. Local people struggle to find and afford suitable accommodation, and many of the district's younger generation are forced to leave the area because they can't afford to live here. We are committed to providing good quality affordable housing, with an emphasis on social rent and provision for young people, military veterans and families.

We will urge the development of homes that are carbon neutral in their build and fuel efficient in their use. Energy efficient homes that are powered by renewable energy are also cheaper to run – contributing to long-term affordability.

We want to ensure that provision for the homeless strikes a balance between meeting their needs, in a way that is financially sustainable for the council. Housing is key to the things we love about living in the Cotswolds: resilient, supportive communities, health and wellbeing, and a safe place to live and thrive. Without a home, none of this can happen, and so it's vital we tackle the housing emergency, and strive to provide a home for everyone.

## **What will we achieve?**

We will deliver good quality housing that is genuinely affordable. Homes that can be adapted to meet changing needs over the lifespan of the building, all while enabling local people on low incomes to stay local. We will ensure that suitable, good quality accommodation is provided for homeless people, and will help them to move into more settled accommodation in the long-term. We will continue to maximise the opportunities presented by our own assets as well as explore innovative routes to progress affordable housing provision within the district.

## **How will we do this?**

- **Work with our partners to deliver more affordable homes**
- **Understand everyone's housing needs**
- **Deliver the new Local Plan**

## What have we done?

- € An exemplar project is the carbon zero affordable housing development in Down Ampney, which will deliver 13 social rented homes. The scheme, granted planning consent in March 2025, involves a vacant plot owned by the council and a neighbouring site with domestic garages owned by Bromford Flagship. The homes will feature roof-mounted solar PV panels, ensuring low utility bills for tenants. Working with partners and stakeholders, we are developing a pipeline of rural affordable housing opportunities, including on council-owned land parcels.
- We are developing a partnership with Bromford/Flagship, who manage 70% of the affordable housing stock in the Cotswold district, with the mutually agreed objectives of
  - Increasing the supply of new homes that are genuinely affordable and create sustainable places and communities.
  - Ensuring that existing homes and communities are resilient and ready to respond to the challenges of the climate emergency.
  - Working collaboratively to ensure residents can thrive in the places they move to.
- We are working with partners and stakeholders to promote an environment for landowners, developers and registered providers of affordable housing to bring forward rural housing opportunities.

### *Cabinet Lead quote*

'The provision of social rented affordable housing that enables local people to stay local is a core priority of this administration, and we must balance this with sustainable, proportionate development so that communities can flourish. We'll support our planning service to prepare a Local Plan that considers this, re-asserting local control over housing provision in the face of government-imposed targets.

Cllr Juliet Layton

## Supporting Communities

### **Why is this important?**

The health and wellbeing of our residents is generally good - above England and regional averages. The Cotswold district is one of the safest, with levels of crime, and we're lucky enough to be surrounded by beautiful countryside. But we do face some challenges – including barriers to service access, as well as loneliness and isolation due to the rural nature of our location.

We know sustainable behaviour change can only be achieved when residents are involved in the design and implementation of services, and so we're committed to working with community, voluntary and public sector partners to tackle these challenges and improve our residents' health and wellbeing for good.

### **What will we achieve?**

We want our district to be the best in the UK for health and wellbeing. We want to ensure all our neighbourhoods are safe and enjoyable places to live, where we know – and can rely on – our neighbours, with access to leisure opportunities and a vibrant cultural scene to enrich our lives.

### **How will we do this?**

- **Strengthen our links with town and parish councils and key stakeholders**
- **Encourage community health and wellbeing**
- **Support our residents in crises**
- **Deliver the new Local Plan**

## What have we done?

- In July 2024, the Council agreed to recommission Crowdfund Cotswold. To date, this programme has supported over 50 projects with £1.2m, pledged from almost 4,300 backers.
- Local charities, activists and others have come together to form the Cotswold Food network, to work creatively to tackle hunger, healthy food and food waste. This partnership has also worked with the council to support financial inclusion, helping households tackle rising food and utility bills.
- The council secured £50,000 through the Strengthening Local Communities Fund to deliver 14 multi-generational community events across the north and south of the district.
- In September 2024, the council launched an 'unsung heroes' award scheme, to celebrate contributions so many people make to their communities. Following the success of this scheme, we launched a 'Young Unsung Hero' category in 2025, to recognise the efforts of young people in trying to give back to the communities they have grown up in.

### *Cabinet Lead quote*

"Our voluntary and community sector is doing brilliant work, but it needs strong backing. I want us to strengthen access to warm spaces, affordable food projects, and financial support. I'm keen to work on solutions that are local, practical and accessible, which make sure rural communities aren't left behind"

Cllr Claire Bloomer

"It's critical that we work closely with our partners across all of the council's priority areas, ensuring that together we deliver the best outcomes for residents and businesses, now and into the future."

Cllr Paul Hodgkinson



## Supporting the Economy

### **Why is this important?**

The Cotswold economy is home to businesses of all sizes and across all sectors forming the cornerstone of our local economy. The visitor economy – built on the back of our beautiful landscape, towns and villages – accounts for a significant proportion of employment and has been severely impacted by the Coronavirus pandemic. However the Cotswold economy is about much more than tourism, and there is potential for even greater diversity. We will manage government investment funds to support those interventions that provide the conditions for businesses and their employees to thrive and grow. Through our economic recovery plan, we want to enable businesses to become more resilient, by enhancing their digital presence and looking at different business models. Our green economic growth strategy puts the climate agenda at the heart of future growth.

### **What will we achieve?**

We want to nurture a dynamic, vibrant and balanced economy, and to grow high value, highly skilled, low environmental impact businesses in the Cotswolds. Our region is already home to some highly creative and innovative businesses. Exciting projects in the agri-tech, cyber and digital, medical equipment and environmental technology sectors promise to provide great opportunities for local people and businesses. As a business-friendly council, we won't just communicate regularly with our local business community – we will work with them and our partners to grow the district's economy to provide better opportunities for local people.

### **How will we do this?**

- **Develop the skills of our residents**
- **Grow a strong and sustainable economy**
- **Manage the opportunity and impact of the visitor economy**
- **Deliver the new Local Plan**

## What have we done?

- Working with the Royal Agricultural University to bring to the table proposals for an Innovation village to support home grown businesses
- Over the past three years, the district has successfully managed a £1.76m Shared Prosperity/Rural England Prosperity Fund, supporting local businesses, the growth hub and critical community infrastructure. In 2025, we've allocated a further £560k
- In 2024, the Council adopted a renewed Green Economic Growth Strategy. The area now hosted cutting edge green aviation businesses such as ZeroAvia and Vertical Aerospace and a growing agritech specialism, as well as continued to attract year-round visitors to our high-quality tourist offer.

### *Cabinet Lead quote*

"We will champion policies and initiatives that help local businesses thrive, create jobs, and strengthen the district's economy. In particular we will focus on trying to get the RAU innovation village back on track."

Cllr Tristan Wilkinson

Our Cotswolds, Our Plan: Action Plan 2024						
Priorities	sub-priority	Action	Portfolio holder	Accountable officer(s)	Start date	End date
Preparing for the future	<b>Driving organisational and cultural change to be fit for the future</b>	Transformation - Develop Strategy Action Plan	Cllr Tristan Wilkinson/ Mike Every	Helen Martin	Aug-25	Mar-28
Preparing for the future	<b>Driving organisational and cultural change to be fit for the future</b>	Workforce fit for the future: Develop an action plan designed to drive organisational and cultural change within the council to make services more efficient, responsive, and future-ready.	Cllr Tristan Wilkinson	Helen Martin	Oct-25	Mar-28
Preparing for the future	<b>Driving organisational and cultural change to be fit for the future</b>	Digital Transformation: accelerating the use of digital technology to improve council services, enhance accessibility, and promote digital inclusion across communities.	Cllr Tristan Wilkinson	Helen Martin	Oct-25	Mar-28
Preparing for the future	<b>Preparing for Local Government Reorganisation</b>	Prepare the LGR submission to government. Prepare the next phase of the LGR Programme. Implement the governments decision.	Cllr Mike Every	Jane Portman	already commenced	Mar-28
Preparing for the future	<b>Preparing for Local Government Reorganisation</b>	Consult with other local authorities to inform possible options for establishing a Strategic Authority	Cllr Mike Every	Jane Portman	already commenced	Mar-28
Preparing for the Future	<b>Developing our workforce</b>	Deliver the People and Culture Strategy	Cllr Mike Every	Jane Portman	Sep-25	Mar-28
Preparing for the future	<b>Developing our workforce</b>	Deliver the Internal Communications Plan, to keep st	Cllr Mike Every	Matt Abbott	Sep-25	Mar-28
Preparing for the future	<b>Developing our workforce</b>	Consideration of a small number of functions currently in Publica in light of their focus core function delivery	Cllr Mike Every	Jane Portman	Jul-25	Dec-25
Preparing for the future	<b>Deliver the new Local Plan</b>	Adopt the new Local Plan, providing a robust development framework for the Cotswold area post 2028	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Dec-27
Delivering good services	<b>Ensure value for money and good standards</b>	Develop a Fleet Replacement programme	Cllr Andrea Pellegram	Peta Johnson	already commenced	Apr-26
Delivering good services	<b>Ensure value for money and good standards</b>	Improve and digitise engagement with the customers of the Waste and Environment Services	Cllr Andrea Pellegram	Peta Johnson	already commenced	Mar-28
Delivering good services	<b>Ensure value for money and good standards</b>	Adapt to changes in Waste legislation	Cllr Andrea Pellegram	Peta Johnson	already commenced	Mar-28
Delivering good services	<b>Ensure value for money and good standards</b>	Implement the Planning Advisory Service action plan	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Aug-26

Delivering good services	Enhance financial resilience and make best use of our assets	Maintain financial sustainability over the MTF5-period (2026/27 to 2029/30) following the outcome of the Fair Funding 2.0 review.	Cllr Patrick Coleman	David Stanley	Apr-26	Mar-28
Delivering good services	Play our part in maintaining and enhancing the public realm	Introduce charging to sustain Council owned public toilets.	Cllr Paul Hodgkinson	Sue Hughes/Claire Locke	already commenced	Dec-25
Delivering good services	Play our part in maintaining and enhancing the public realm	Deliver the new Parking Strategy.	Cllr Paul Hodgkinson	Sue Hughes	already commenced	Mar-28
Delivering good services	Play our part in maintaining and enhancing the public realm	Invest in and maintain our car parks	Cllr Paul Hodgkinson	Alan Hope	already commenced	Mar-28
Delivering good services	Deliver the new Local Plan	Ensure our planning policies deliver our corporate priorities and promote carbon neutral development and infrastructure	Cllr Juliet Layton	Geraldine LeCointe Jo Symons	already commenced	Dec-26
Responding to the climate emergency	Support and Enable Residents & Businesses	Expand the network of Electric Vehicle Charge Points	Cllr Mike McKeown	Olivia McGregor	already commenced	Mar-28
Responding to the climate emergency	Decarbonise Council Operations	Embed climate action into council services to reduce the council's operational carbon emissions	Cllr Mike McKeown	Olivia McGregor	already commenced	Mar-28
Responding to the climate emergency	Increase resilience to the effects of climate change	Work in partnership to respond to the Climate Risk and Vulnerability Assessment	Cllr Mike McKeown	Olivia McGregor	Oct-25	Mar-28
Responding to the climate emergency	Deliver the new Local Plan	Deliver high quality retrofit advice and support installation of renewables across the district through policy, partnership working and initiatives	Cllr Mike McKeown	Olivia McGregor	already commenced	Mar-28
Delivering Housing	Deliver the new Local Plan	Allocate a portfolio of sites that will boost housing delivery whilst respecting the significant constraints across the district	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Dec-26
Delivering Housing	Working with our partners to deliver more affordable homes	Move forward a Pipeline of Rural Affordable Housing Sites and develop ways to increase Affordable Housing delivery	Cllr Juliet Layton	Alan Hope	already commenced	Mar-28
Delivering Housing	Understanding everyone's housing needs	Adopt and implement the Preventing Homelessness Strategy	Cllr Juliet Layton	Jon Dearing Caroline Clissold	Sep-25	Mar-28
Delivering Housing	Understanding everyone's housing needs	Continue to monitor housing needs to inform the councils revised Housing Strategy	Cllr Juliet Layton	Jon Dearing Caroline Clissold	already commenced	Mar-28
Delivering Housing	Understanding everyone's housing needs	Refocus the Housing Strategy on Strategic Actions.	Cllr Juliet Layton	Alan Hope	Aug-25	Oct-25

Supporting communities	<b>Strengthen our links with town and parish councils and key stakeholders</b>	Engage with and support town and parish councils to prepare for Local Government Reorganisation	Cllr Mike Every	Matt Abbott	Jun-25	Mar-28
Supporting communities	<b>Encourage community health and wellbeing</b>	Enable networking and public engagement events to help local residents to access support services	Cllr Claire Bloomer	Joseph Walker	already commenced	Mar-28
Supporting communities	<b>Encourage community health and wellbeing</b>	Celebrate the contribution of individuals and local groups	Cllr Claire Bloomer	Joseph Walker	already commenced	Mar-28
Supporting communities	<b>Encourage community health and wellbeing</b>	Promote community activity through Crowdfund Cotswold	Cllr Claire Bloomer	Joseph Walker	already commenced	Mar-28
Supporting communities	<b>Encourage community health and wellbeing</b>	Ensure the leisure and culture contracts deliver core provision and positive community outcomes	Cllr Paul Hodgkinson	Joseph Walker	already commenced	Mar-28
Supporting communities	<b>Encourage community health and wellbeing</b>	Work with Cotswold Youth Network to champion to contribution and needs of young people	Cllr Claire Bloomer	Joseph Walker	Oct-25	Mar-28
Supporting communities	<b>Support our residents in crises</b>	Coordinate a partnership response to address financial hardship and the cost of living	Cllr Claire Bloomer	Joseph Walker	already commenced	Mar-28
Supporting communities	<b>Support our residents in crises</b>	Work with the NHS Integrated Locality Partnership to improve the quality of life of children and vulnerable households	Cllr Claire Bloomer	Joseph Walker	already commenced	Mar-28
Supporting communities	<b>Support our residents in crises</b>	Work with the Cotswold Community Safety Partnership to improve road safety and reduce antisocial behaviour	Cllr Paul Hodgkinson	Joseph Walker	already commenced	Mar-28
Supporting communities	<b>Deliver the new Local Plan</b>	Ensure our planning policies deliver community infrastructure to match growth	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Mar-28
Supporting the economy	<b>Develop the skills of our residents</b>	Support key sectors to create new highly skilled jobs, including through promotion of apprenticeship opportunities.	Cllr Tristan Wilkinson	Joseph Walker Paul James	already commenced	Mar-28
Supporting the economy	<b>Grow a strong and sustainable economy</b>	Deliver a programme of activities through the Shared Prosperity and Rural England Prosperity Funds	Cllr Tristan Wilkinson	Joseph Walker Paul James	Mar-25	Mar-26
Supporting the economy	<b>Grow a strong and sustainable economy</b>	Deliver the actions set out in the refreshed Green Economic Growth Strategy.	Cllr Tristan Wilkinson	Joseph Walker Paul James	Jan-25	Mar-28
Supporting the economy	<b>Grow a strong and sustainable economy</b>	Work with the Royal Agricultural University on their aspiration for the Innovation Village	Cllr Tristan Wilkinson	Joseph Walker Paul James	already commenced	Mar-28
Supporting the economy	<b>Grow a strong and sustainable economy</b>	Promote the Growth Hub to support existing businesses and encourage the growth of start-ups	Cllr Tristan Wilkinson	Joseph Walker Paul James	already commenced	Mar-28

Supporting the economy	Grow a strong and sustainable economy	Work with partners to realise benefits of the Creative Cotswolds Action Plan	Cllr Paul Hodgkinson	Joseph Walker	Sep-25	Mar-28
Supporting the economy	Manage the opportunity and impact of the visitor economy	Refresh the Tourism Destination Management Plan	Cllr Paul Hodgkinson	Joseph Walker Chris Jackson	Sep-25	Sep-26
Supporting the Economy	Deliver the new Local Plan	Promote policies that support sustainable economic growth in the district	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Dec-26

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Preparing for the future	<b>Developing our workforce</b>	Deliver the Internal Communications Plan	Cllr Mike Every	Matt Abbott	Sep-25	Mar-28

Preparing for the future	<b>Developing our workforce</b>	Consideration of a small number of functions currently in Publica in light of their focus core function delivery	Cllr Mike Evemy	Jane Portman	Jul-25	Dec-25
Preparing for the future	<b>Deliver the new Local Plan</b>	Adopt the new Local Plan, providing a robust development framework for the Cotswold area post 2028	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Dec-27
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Delivering good services	<b>Ensure value for money and good standards</b>	Implement the Planning Advisory Service action plan	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Aug-26
Delivering good services	<b>Enhance financial resilience and make best use of our assets</b>	Maintain financial sustainability over the MTFS-period (2026/27 to 2029/30) following the outcome of the Fair Funding 2.0 review.	Cllr Patrick Coleman	David Stanley	Apr-26	Mar-28
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<b>Delivering Housing</b>	<b>Understanding everyone's housing needs</b>	Continue to monitor housing needs to inform the councils revised Housing Strategy	Cllr Juliet Layton	Jon Dearing Caroline Clissold	already commenced	Mar-28

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<b>Supporting communities</b>	<b>Support our residents in crises</b>	Work with the Cotswold Community Safety Partnership to improve road safety and reduce antisocial behaviour	Cllr Paul Hodgkinson	Joseph Walker	already commenced	Mar-28

Supporting communities	<b>Deliver the new Local Plan</b>	Ensure our planning policies deliver community infrastructure to match growth	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Mar-28
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**COTSWOLD**  
District Council

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET 4 SEPTEMBER 2025</b>
Subject	<b>COUNCIL PRIORITY AND SERVICE PERFORMANCE REPORT – 2025-26 QUARTER ONE (APRIL-JUNE 2025)</b>
Wards affected	All
Accountable member	Councillor Mike Every, Leader of the Council Email: <a href="mailto:mike.every@cotswold.gov.uk">mike.every@cotswold.gov.uk</a>
Accountable officer	Jane Portman, Interim Chief Executive Email: <a href="mailto:jane.portman@cotswold.gov.uk">jane.portman@cotswold.gov.uk</a>
Report author	Alison Borrett, Senior Performance Analyst Email: <a href="mailto:alison.borrett@cotswold.gov.uk">alison.borrett@cotswold.gov.uk</a>
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 2025-26 Q1 (April-June 2025).
Corporate priorities	<ul style="list-style-type: none"> <li>• Delivering Good Services</li> <li>• Responding to the Climate Emergency</li> <li>• Delivering Housing</li> <li>• Supporting Communities</li> <li>• Supporting the Economy</li> </ul>
Key Decision	NO
Exempt	NO
Consultees/ Consultation	Cotswold District Council retained senior managers, Publica Directors, Assistant Directors, Business Managers, Service Managers and Service Leads.



## **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. Publica also provides performance data on services transferred back to the Council. A similar approach is taken in relation to financial performance data, which will be presented to the Chief Executive 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 Our Cotswolds, Our Plan 2024-28 ('the Plan') in January 2024. The Plan sets out the Council's Aim, and key priorities, and sets out the key measures of success.
- 2.2** Progress on key actions identified in the Corporate Plan for Q1 (April-June 2025) include:
- The Council's Phase 2 transition plan to bring services back in-house was approved by Cabinet and Full Council. Formal consultation with affected employees began in April, with employees successfully transferred on 1<sup>st</sup> July 2025.
  - A proposal to establish a Climate Board was approved by Cabinet in July 2025. The Board will provide strategic oversight of the Council's climate work and help embed climate action across services and partnerships.
  - The Council continues to actively support community-led renewable energy initiatives, including Thames Head Community Energy, a local not-for-profit Community Benefit Society. The Council's backing includes policy support, financial contributions through Crowdfund Cotswold, and involvement in regional programmes such as Climate Leadership Gloucestershire's Community Energy workstream, helping to deliver environmental and community benefits across the district.
  - Work is progressing on the new Cotswold Design Guide, which will help shape future development across the district. An advanced draft of the Design Code has



been produced, and the final stage, reviewing consultation feedback and making necessary updates, is currently underway.

- A pipeline of around eight rural affordable housing sites is being developed. The Council is working with Bromford through a new Partnership Framework to boost delivery across both new-build and regeneration schemes. Engagement with Homes England is also underway to explore a package of measures that could enhance rural affordable housing delivery in the district.
- A successful Town and Parish Council summit was held in June, with over 100 attendees and a focus on local government reorganisation.
- On 16 July 2025, Full Council resolved to merge the partial update of the adopted Local Plan (2011–2031) with the Development Strategy and Site Allocations Plan into a single, comprehensive Full Local Plan Update. This unified approach will also incorporate elements of the Gloucestershire Strategic Plan where appropriate, with submission targeted for 2026 and adoption in 2027.
- The Young Unsung Hero Award was successfully launched, with three winners celebrated at the July Council meeting alongside recipients of the main Unsung Heroes Award.
- The Communities team worked closely with the Communications team to highlight local successes, including media coverage of the Parkinson Table Tennis Project at Cirencester Leisure Centre, which was featured by both ITV and BBC.
- The Council's Crowdfund Cotswold initiative launched five new projects this quarter, including the Phoenix Festival, which attracted around 150 pledges of support.

**2.3** Off target actions of the Corporate Plan behind schedule at the end of Q1 (April-June 2025) are detailed below. Whilst this report is a retrospective account of progress in Q1, where possible, the current status is also included for assurance.

Delivering good services

**Instigate second phase of activity to replace worn and damaged street nameplates**

**Q1 update:** Ubico is progressing with outstanding signs.

Responding to the climate emergency

**Develop and deliver an Electric Vehicle Charge Point Strategy**

**Q1 update:** Delivery of ORCS funded EVCPs across four sites is progressing. An extension to end September beyond original 31st March completion has been agreed with funders. Delays multiple in nature but two most prominent were SSEN connection issues took a long time to rectify and CK suppliers taking months to



install a meter after connection. EVCPs in Market Way, Moreton in Marsh, Maugersbury road in Stow on the Wold and West Street in Tetbury have been commissioned. Awaiting sign off from Assets team who are to confirm they are operating effectively. The Commissioning of EVCPs at Brewery, Cirencester took place at the end of July.

**Work with Cirencester Town Council on the coordination of the Cirencester Town Centre Masterplan and the Cirencester Neighbourhood Plan policies**

**Q1 update:** Recent data from the Environment Agency has put the Waterloo Car park in Cirencester in the flood zone. The Waterloo Car Park, is an area proposed for major development in the Masterplan. Therefore, further work is required to establish if the issues can be resolved prior to taking the Masterplan any further. Work has been commissioned in this regard and is currently being undertaken.

Delivering Housing

**Consult and adopt the Council's new Housing strategy**

**Q1 update:** The Housing Strategy Document was prepared in early 2024 and needs to be updated to reflect the new Govt housing targets, the new NPPF, the emerging local plan and be coordinated with other related strategies/policies (e.g Homelessness/Empty Properties/Net Zero etc). It is proposed to condense the Housing Strategy document and focus it on Strategic actions with appropriate references to other related documents such as the Local Plan. The updated document will be prepared Autumn 2025.

Supporting communities

**Continue to work with Gloucestershire County Council on the creation of a safe crossing of the Spine Road**

**Q1 update:** Design work for the Spine Road crossing is underway, with preliminary design completion expected by December 2025 and detailed design by April 2026. However, implementation remains dependent on resolving issues related to the adjacent bridge. Previously earmarked UK Shared Prosperity Fund (UKSPF) funding was reallocated to other projects to meet year-end spending targets and deliver local benefits.

- 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**

Overall, the Council's performance in Q1 2025/26 has remained broadly positive, building on the strong foundations laid in previous quarters. Continued improvements were seen in key areas such as Council Tax and Non-Domestic Rates collection, planning determination times, and customer satisfaction. Leisure centre visits and gym memberships remained high, reflecting strong public engagement with health and wellbeing services. However, some challenges persist. Processing times for Council Tax Support and Housing Benefit change events exceeded targets, largely due to operational adjustments linked to Universal Credit automation. Additionally, the percentage of household waste recycled declined slightly, in line with seasonal patterns and national trends. The number of affordable homes delivered in Q1 was also below target, though long-term delivery remains strong.

#### **3.1 Service performance above target:**

- Percentage of Council Tax Collected (33.09% against the quarterly target of 33%)
- Percentage of Non-domestic rates collected (28.49% against the quarterly target of 27%)
- Processing times for Council Tax Support New Claims (19.65 days against a target of 20 days)
- Customer Satisfaction (97.37% against a target of 90%)
- Percentage of major planning applications determined within agreed timescales (85.71% against a target of 70%)
- Percentage of minor planning applications determined within agreed timescales (87.64% against a target of 65%)
- Percentage of other planning applications determined within agreed timescales (93.41% against a target of 80%)
- Percentage of official land charge searches completed within 10 days (95.07% against a target of 90%)
- Percentage of high risk food premises inspected within target timescales (100% against a target of 95%)
- Residual Household Waste per Household (kg) (85.94 against a target of 97) – Q4 figures as awaiting Q1 data from Gloucestershire County Council
- Missed bins per 100,000 (72.4 against a target of 80)
- Number of visits to the leisure centres (140,226 visits against a target of 126,810)



**3.2** Service Performance near target:

- Percentage of Housing Benefit overpayment due to LA error/admin delay (0.46% against a target of 0.35%)
- Percentage of FOI requests answered within 20 days (86.99 against a target of 90%)
- Percentage of household waste recycled (56.66% against a target of 60%) – Q4 figures as awaiting Q1 data from Gloucestershire County Council
- Number of gym memberships (4,438 against a target of 4,441)

**3.3** Service Performance below target:

**Processing times for Council Tax Support Change Events (13.9 days against a target of 5 days) and Housing Benefit Change of Circumstances (10.41 days against a target of 4 days).**

Previous Quarter: In Q4, Council Tax Support Change of Events were processed well within target, averaging around 3.5 days. However, Housing Benefit Change of Circumstances fell short of the target, with average processing times of approximately 5 days.

Q1: The Council experienced an increase in processing times for both Council Tax Support change of events and Housing Benefit changes of circumstances, exceeding the respective targets of 5 and 4 days. Council Tax Support changes averaged 13.9 days, while Housing Benefit changes averaged 10.41 days. This rise was primarily driven by a planned one-month pause in uploading Universal Credit (UC) applications, which allowed the team to focus on clearing a backlog of manual applications and to collaborate with partners on improving automation processes. The pause also provided an opportunity to accommodate changes introduced by the Department for Work and Pensions (DWP), who had updated the UC data feed to include additional items.

Prior to the pause, UC automation rates typically ranged between 60% and 70%. Since resuming uploads, batch automation rates have consistently exceeded 90% and daily processing has stabilised. Notably, processing times for CTS change of events have significantly improved, with the average for July falling to just 3.59 days. However, given the cumulative nature of the metric, processing times are expected to improve steadily over the coming months, though they are unlikely to return to within target until Quarter 3.

The ongoing managed migration from Housing Benefit to Universal Credit has also introduced greater complexity into the remaining caseload, with many cases involving exceptional or nuanced circumstances. As the volume of Housing Benefit change of



circumstances continues to decline, any delays now have a more pronounced impact on average processing times. The service continues to explore targeted initiatives, including the use of the Low Income Family Tracker (LIFT) tool, to help residents access unclaimed benefits and improve financial resilience.

**Percentage of Planning Appeals Allowed (cumulative) (50% against a target of 30%)**

Previous Quarter: During Q4, six appeals were decided, with one allowed in favour of the applicant, resulting in a 16.67% allowance rate for the quarter. As this metric is cumulative, the end of year total stood at 53 appeals, with 11 allowed (20.75% allowance rate).

Q1: Between 1 April and 30 June 2025, seven appeals were decided, with three allowed in favour of the applicant and one resulted in a split decision, resulting in a 50% allowance rate for the quarter. As this metric is cumulative, it may decrease throughout the year depending on the number of appeal decisions received.

While the general target is for no more than 30% of appeals to be allowed, the Growth and Infrastructure Act 2013 introduced a formal system for assessing the performance of local planning authorities. Under the designation criteria, an authority may be identified as underperforming if 10% or more of its total planning decisions are overturned at appeal.

This measure of decision quality is assessed over a rolling two-year period and is applied separately to major and non-major development categories. It's important to note that the 10% threshold is based on the total number of decisions made, not just those that are appealed. Authorities exceeding this threshold in either category may be designated, allowing applicants to submit certain types of applications directly to the Secretary of State.

**Number of affordable homes delivered (cumulative) (2 delivered against a target of 25).**

Previous Quarter: During Q4, six affordable homes were delivered within the district, bringing the total to fifty-six for 2024-2025.

Q1: In Cotswold, just two affordable homes were delivered in Q1, marking a slow start to the year. Registered Providers are currently projecting only 64 completions



for 2025/26—well below the annual target of 100—making it unlikely the district will meet its goal.

The delivery of affordable housing is subject to fluctuations, as most developments take over a year to complete and often progress in multiple phases over several years. Early over delivery at the beginning of the current strategy has also contributed to the dip in recent annual outputs, as the early years set a higher baseline.

Since the adoption of the Local Plan in 2018, the district has delivered approximately 880 affordable homes, averaging around 125 homes per year. Despite the recent dip in completions, this continues to reflect the Council's ongoing commitment to delivering affordable housing and meeting long-term housing needs in the area.

**3.4** A full performance report is attached at Annex C.

**3.5** 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**

This report will be reviewed by the Overview and Scrutiny Committee at its meeting on 1 September 2025. The draft minutes of that meeting will be circulated to all Members and any recommendations from the Committee will be reported to Cabinet.

#### **5. FINANCIAL IMPLICATIONS**

**5.1** 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.



**COTSWOLD**  
District Council

**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)

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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
Not Scheduled to Start	Workstream not Scheduled to Start during Quarter
Cancelled	
On Hold	

Objectives	Priorities	Actions	Commencement	Target Date	Cabinet Member, Lead officer(s)	RAG Rating	Comment for Q1
Delivering good services	Ensure our workforce can deliver for the council and our community	Deliver a programme to bring Council services back in-house, maximising responsiveness and democratic accountability	Nov-23	Projected timeframe of two years, until 2025	Cllr Mike Evemy	On Target	The Council's Phase 2 transition plan to bring services back in-house was approved by Cabinet and Full Council. Formal consultation with affected employees began in April, with employees successfully transferred on 1st July 2025.
		Lease spare office space at Trinity Road	Dec-23	Jul-24	Cllr Patrick Coleman Claire Locke Suzanne Barton		
	Ensure effective oversight of our services, to ensure value for money and good standards	Review the waste service, and undertake an options appraisal	Dec-23	Jun-24	Cllr Andrea Pellegram David Stanley	Complete	Completed
		Continue to ensure that the Council's MTFS five year strategy reflects economic conditions and the government's funding settlement	Feb-24	Reviewed annually	Cllr Patrick Coleman David Stanley		
	Enhance our financial resilience and make best use of our assets	Implement the Council's new asset management strategy and asset plans	Apr-24	Review April 2025	Cllr Patrick Coleman David Stanley	Complete	Completed
		Instigate second phase of activity to replace worn and damaged street nameplates	Feb-24	Feb-25	Cllr Andrea Pellegram Alan Hope	Off Target, but action being taken to ensure delivery	Ubico progressing with outstanding signs.
	Play our part in maintaining and enhancing the public realm across the district						
Responding to the climate emergency	Reduce CO2 from Transport: We will actively encourage and support the transition to EVs and increased use of public and sustainable transport such as cycling and walking.	Develop and deliver an Electric Vehicle Charge Point Strategy	Jan-24	Jul-24	Cllr Mike McKeown Olivia McGregor	Off Target, but action being taken to ensure delivery	Delivery of ORCS funded EVCPs across four sites is progressing. An extension to end September beyond original 31st March completion has been agreed with funders. Delays multiple in nature but two most prominent were SSEN connection issues took a long time to rectify and CK suppliers taking months to install a meter after connection. EVCPs in Market Way, Moreton in Marsh, Mangersbury road in Stow on the Wold and West Street in Tetbury have been commissioned. Awaiting sign off from Assets team who are to confirm they are operating effectively. The Commissioning of EVCPs at Brewery, Cirencester took place at the end of July.
		Work with partners to implement the Sustainable Transport Strategy	Adoption as part of the Local Plan - projected Dec 2026	Apr-28	Cllr Mike McKeown Geraldine LeCointe Jo Symons	Not Scheduled to Start During Quarter	Workstream not scheduled to start this quarter

		Taxi Transition - explore the opportunity for the creation of an EV Taxi policy	Apr-24	Jun-25	Cllr Mike McKeown	Off Target, but action being taken to ensure delivery	
					Jon Dearing Mandy Fathers		
	<b>Cut Council Carbon Footprint, implementing sustainable practices in all council operations, emphasising energy efficiency and</b>	Create a Climate Board, agree governance arrangements and key outcomes.	Jan-24	Review January 2025	Cllr Mike McKeown	On Target	Proposal for creation of a Climate Board written and approved by Cabinet July 2025.
					Olivia McGregor		
	<b>Increase renewable energy generation within the district, ensuring local benefit</b>	Support and promote community owned renewables initiatives	Dec-23	Review June 2024	Cllr Mike McKeown	On Target	Cotswold District Council has been actively supporting community energy initiatives within the district, including Thames Head Community Energy. This not-for-profit Community Benefit Society (CBS) organisation, based in the Cotswolds, aims to develop local renewable energy projects to benefit the community and the environment. CDC's support has included policy backing, financial contributions through Crowdfund Cotswolds, and participation in broader regional initiatives such as Climate Leadership Gloucestershire's Community Energy workstream.
					Olivia McGregor		
		Explore the business cases for the installation of solar panels on Council owned assets.	Jan-24	Jul-24	Cllr Mike McKeown	Complete	Completed
					Claire Locke		
	<b>Champion initiatives to address the ecological emergency and nature recovery, focusing on reducing CO2 and conserving and enhancing the</b>	Implement the new requirements around Biodiversity Net Gain (BNG)	Jan-24	Review July 2024	Cllr Juliet Layton	Complete	Completed
					Geraldine LeCointe		
	<b>Reduce CO2 from Buildings: Foster community-led climate action, supporting residents and businesses adopting renewable heating and improving energy efficiency.</b>	Continue to promote and deliver Cotswold Home Solar, in partnership with MakeMyHouseGreen	Jan-23	Review July 2024	Cllr Mike McKeown	On Target	Cotswold Home Solar continues to be promoted and delivered.
					Olivia McGregor		
		Consider the business case on optimising the delivery of high quality retrofit advice and support	Jul-24	Jul-25	Cllr Mike McKeown Cllr Juliet Layton	On Target	The Council has partnered with Gloucestershire authorities to launch a retrofit support service - using supplier Furbnow - which has been live since 22nd January. This service offers energy efficiency plans, project specifications, vetted installers, and installation management. To date 7 households have requested energy efficient house plans. Additionally, CDC has employed a Retrofit Engagement Officer who is engaging communities and providing retrofit advice until September 2025. She is delivering community events and offering free home visits to identify opportunities to install renewable energy and make energy efficiency improvements. In addition, Severn Wye Energy Agency (SWEA) are the chosen contractor to deliver free energy efficiency advice for low-income households through the Warm and Well Scheme for the next 5 years.
					Olivia McGregor		
	<b>Ensure our planning policies deliver our corporate priorities and promotes both carbon neutral development and infrastructure</b>	Subject to proposed legislative changes, complete full review of the Local Plan	Jan-24	Dec-26	Cllr Juliet Layton	On Target	On 16 July 2025 Full Council resolved to merge the two ongoing Local Plan projects: •the partial update of the adopted Cotswold District Local Plan (2011-2031); and •the Development Strategy and Site Allocations Plan, into a single comprehensive Full Local Plan Update in conjunction with incorporating work of the Gloucestershire Strategic Plan, where appropriate, with a view to submission in 2026 and adoption in 2027.
					Geraldine LeCointe Jo Symons		
		Develop a new Cotswold Design Guide – building for the future in the Cotswolds	Sep-23	Nov-26	Cllr Juliet Layton	On Target	An advanced draft of the Design Code has been produced. The final task, which is currently being undertaken is to review the representations made on the last Design Code consultation and make any necessary updates.
					Geraldine LeCointe Jo Symons		



Delivering Housing		Work with Cirencester Town Council on the coordination of the Cirencester Town Centre Masterplan and the Cirencester Neighbourhood Plan policies	Jan-24	Nov-26	Cllr Juliet Layton	Off Target, but action being taken to ensure delivery	Recent data from the Environment Agency has put the Waterloo Car park in Cirencester in the flood zone. The Waterloo Car Park, is an area proposed for major development in the Masterplan. Therefore further work is required to establish if the issues can be resolved prior to taking the Masterplan any further. Work has been commissioned in this regard and is currently being undertaken.
					Geraldine LeCointe Jo Symons		
	Working with our partners to explore innovative routes to deliver more affordable homes	Explore innovative approaches to housing delivery	Feb-24	Aug-25	Cllr Juliet Layton	On Target	A Pipeline of Rural Affordable Housing Sites is being developed (circa 8 potential sites identified). A Partnership Framework with Bromford is developing ways to increase Affordable Housing delivery in both New-Build and Regeneration sites. Engagement is underway with Homes England exploring how a package of measures could improve the potential for Rural Affordable Housing delivery in Cotswold District.
					Alan Hope		
		Deliver an exemplar zero carbon affordable housing development in Down Ampney	Dec-23	Apr-28	Cllr Juliet Layton	On Target	Planning consent was granted on 12th March, however Bromford need to resolve issues with the surface water drainage design and are discussing the timeline for Thames Water Infrastructure upgrades to accommodate the development. This may delay commencement of works until 2027 unless Thames Water bring their upgrade plans forward.
					Alan Hope		
	Understanding everyone's housing needs	Support refugees to retain adequate housing	Jul-23	Review March 2025	Cllr Claire Bloomer	On Target	Work is ongoing to support all refugees whether on a resettlement scheme or dispersed asylum. In addition to working to ensure the families and individuals are adequately housed there is ongoing wraparound support being provided to assist with resettlement and community cohesion.
					Jon Dearing Caroline Clissold/ Paula Massey		
		Continue to monitor housing needs, using Homeseeker Plus, to inform housing strategy and implementation	Jan-24	Mar-25	Cllr Juliet Layton	On Target	The Housing Team prevent homelessness for an average of 50 households per quarter. By preventing homelessness before it occurs, this reduces the number of families who need to be accommodated in expensive B&B accommodation, which can also be outside of the district. A new Preventing Homelessness Strategy for 2025-2030 will be presented to Cabinet in Autumn 2025. The strategy identifies the route causes of homelessness and the action plan will target those areas with the aim of reducing homelessness at the earliest possible stage. This approach minimises both disruption for our clients, and reduces the cost burden on the local authority. The Housing Team also have a strong approach to rough sleeping ensuring that when it does occur, it is brief and non recurring. CDC continue to report low to zero rough sleeping in the district.
					Jon Dearing Caroline Clissold		
		Continue to build on the success of the Housing First Project with a new county wide approach	Jan-24	Mar-25	Cllr Juliet Layton	On Target	The Cotswold Housing First project continues to be recognised across the county as being an exemplary example of how projects of this type should be approached. Successful outcomes are above national averages and the Housing Team continue to work closely with Bromford and P3 to ensure the continued success of this project. There are currently now 8 individuals accommodated in Housing First, following an allocation of external funding awarded to P3 to extend the offer the original offer of 6 spaces to a further 2 clients, giving us 8 spaces in total.
					Jon Dearing Caroline Clissold		
Supporting communities	Adopting and implementing our new housing strategy	Consult and adopt the Council's new Housing strategy	Dec-23	Jun-24	Cllr Juliet Layton	Off Target, but action being taken to ensure delivery	The Housing Strategy Document was prepared in early 2024 and needs to be updated to reflect the new Govt housing targets, the new NPPF, the emerging local plan and be coordinated with other related strategies/policies (e.g Homelessness/Empty Properties/Net Zero etc). It is proposed to condense the Housing Strategy document and focus it on Strategic actions with appropriate references to other related documents such as the Local Plan. The updated document will be prepared Autumn 2025.
					Alan Hope		
	Strengthen our links with town and parish councils and key stakeholders	Continue the annual programme of Town and Parish Council Forum engagement events	Jan-24	Jan-25	Cllr Mike Evemy	On Target	Successful Town & Parish Council summit with over 100 attendees held 04.06.2025 focusing on local government re-organisation.
					Angela Claridge		

	<b>Address the challenges of flooding and water quality and sewerage discharges</b>	Identify opportunities to influence policy and host a sewage summit with the outcome being reported to the Council in May.	Jan-24	Oct-24	Cllr Tristan Wilkinson Matthew Britton	Complete	Completed
		Identify gaps and bolster the Cotswold Flood wardens programme	Jan-24	Jun-24	Cllr Tristan Joseph Walker	Complete	Completed
	<b>Enhance connectivity, and biodiversity in the Cotswold Water park</b>	Continue to work with Gloucestershire County Council on the creation of a safe crossing of the Spine Road	Jan-24	Review in January 2025	Cllr Juliet Layton Joseph Walker	Off Target, but action being taken to ensure delivery	Design work for the Spine Road crossing is underway, with preliminary design completion expected by December 2025 and detailed design by April 2026. However, implementation remains dependent on resolving issues related to the adjacent bridge. Previously earmarked UK Shared Prosperity Fund (UKSPF) funding was reallocated to other projects to meet year-end spending targets and deliver local benefits.
		Install cycle racks, in consultation with the local community	Jan-24	Mar-25	Cllr Juliet Layton Joseph Walker	Complete	Completed
		Work with partners to embed the Nature Recovery Plan for Cotswold Lakes	Jan-24	Review every six months	Cllr Juliet Layton Geraldine LeCointe		
	<b>Healthy place making through the Local Plan</b>	Embed Healthy Homes Act into the Cotswold Design Code	Dec-26	Dec-26	Cllr Juliet Layton Geraldine LeCointe Jo Symons	Not Scheduled to Start During Quarter	Workstream not scheduled to start this quarter
		Introduce a requirement for Community Access Defibrillators in new developments	Dec-26	Dec-26	Cllr Juliet Layton Geraldine LeCointe Jo Symons	Not Scheduled to Start During Quarter	Workstream not scheduled to start this quarter
		Focus on green infrastructure, to enhance biodiversity and community wellbeing	Dec-26	Dec-26	Cllr Juliet Layton Geraldine LeCointe Jo Symons	Not Scheduled to Start During Quarter	Workstream not scheduled to start this quarter
	<b>Develop and deliver a District Council cultural strategy</b>	Commence development of the cultural strategy	Feb-24	Sep-24	Cllr Paul Hodgkinson Joseph Walker	On Target	In light of LGR, a report was prepared for July Cabinet to adjust the ambition - from a longer term strategy to convening a regular network to lead an action plan focussed on quick wins to be delivered in the period up to 2028.
	<b>Encourage resilient, well-connected and active communities that take responsibility for their own health and wellbeing</b>	Continue to deliver an asset based community development approach	Jan-24	Apr-28	Cllr Claire Bloomer Joseph Walker	On Target	Further Strengthening Community Events held throughout the quarter, during the Easter and a Summer half term school holidays, in Bourton, Fairford, Chipping Campden and Tetbury. Emphasis on getting local agencies and partners on board, as well as countrywide agencies. Ongoing work through the Community Safety Partnership, Cotswold Community Network and food network to build strong communication routes to and between local VCSE partners.
		Celebrate success - promote the work being done by partners across the district to inspire communities	Feb-24	Review August 2024	Cllr Claire Bloomer Joseph Walker	On Target	Launch on the Young Unsung Hero Award, resulting in three winners to be celebrated at July Council, along three winners from the 'main' Unsung Heroes award. Communities works closely with the Comms Team to celebrate partner successes, with press and social media pieces in quarter to recognise a range of community projects - such as the Parkinson Table Tennis Project at CLC, picked up by both ITV and BBC.
		Continue to promote community activity through Crowdfund Cotswold	Feb-24	Review August 2024	Cllr Claire Bloomer Joseph Walker	On Target	Five projects launched. One is complete, while the others are still fund raising. These include the Phoenix Festival, which has attracted an impressive circa 150 pledges of support.
		Monitor and review delivery of the District leisure contract with Freedom Leisure	Aug-23	Aug-25	Cllr Paul Hodgkinson David Stanley Joseph Walker	On Target	Regular meetings have taken place, to review performance and to identify and mitigate any risks. These meetings have also presented an opportunity to pick up on complaints, particular around cleanliness at CLC, which has resulted in the contractor investing in additional cleaning hours. The contract management role transferred to CDC on 1 July, with one of the team transferring to CDC to take on the role of Leisure and Culture Manager.

	<b>Promote healthy lifestyles, fun and self-care for all ages</b>	Continue to deliver the Healthier District and Connected Communities objectives and priorities set out in the Active Cotswolds Action Plan, and implement the Playing Pitch Strategy's action plan.	Jan-24	Review January 2025	Cllr Paul Helen Martin Joseph Walker	On Target	The Active Cotswolds support officer continues to support the delivery of the PPS action plan, offering support to a number of emerging projects which could provide additional pitch capacity in the district. The officer also continues to support a range of exercise and movement initiatives across the district, and in both community venues and in CLC.
		Work with partners to develop a consistent, countywide approach to identify opportunities to support to care leavers	Jun-24	Review December 2024	Cllr Paul Hodgkinson David Stanley Joseph Walker	On Target	World Jungle, the convenors for the Cotswold Youth Network, are also a HAF provider, and have used youth activity sessions to engage with young people to better understand their expectations and thoughts about participation. Their partnership Platform 'Basecamp' presents an electronic resource to enable sharing of data and experience within the partnership to provide a user voice on service design.
		Continue to be a proactive member of the Cotswold Food Network Steering Group and support initiatives under the network's umbrella	Jan-24	Review January 2025	Cllr Claire Bloomer Joseph Walker	On Target	The Food Network has furthered work on Food Gleaning - that is the collect/redistribution of surplus or waste food. The network continues to work closely with the Council on cost of living campaigns working of the LIFT data - looking both at underclaimed benefits but also opportunities such as social tariffs on utilities.
		Continue to work with the NHS Integrated Locality Partnership to support youth mental health	Jan-24	Review January 2025	Cllr Claire Bloomer Joseph Walker	On Target	CDC continues to work through the ILP and its Children and Young People Subgroup, now aligned with the County's One Plan group to minimise overlap. This includes investment via the the ICB's Supporting Local Communities funding - this funding will support a range of activities, including better provision of support for young people's mental health in the North Cotswolds through Headspace.
	<b>Work with partners to ensure vital services cover the district, and offer support to our residents if crises hit</b>	Maintain a multi-service response to the cost of living crisis, and other challenges to community wellbeing	Jan-23	Review January 2025	Cllr Claire Bloomer Claire Locke Joseph Walker	On Target	The LIFT platform continues to provide a useful resource to target households in need. Two letters recently went out, to working age households and retired households, notifying local residents of opportunities to manage water and fuel bills. In two pilot areas, we will also work with partners to provide surgery sessions to help residents take advantage of these opportunities. Across the County there is a campaign to promote Healthy Start - locally LIFT will give this a boost by identifying the eligible cohort and targetting communications.
		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	Feb-24	Review February 2025	Cllr Paul Hodgkinson Joseph Walker	On Target	The CCSP met in person in April, which was a great opportunity for new representatives to get to know each other and forge partner links which should support joint working going forward. Activity in quarter was limited, due to some staff constraints and changes across the county to neighbourhood policing. Through the summer, the council and other partners will be supporting the Police on Operation Shield - the local version of a national campaign around high street safety - by delivering a Strengthening Communities event in Cirencester of 7th August.
	<b>Keep residents safe, through awareness raising around domestic abuse and fraud</b>	Deliver Rural Domestic Abuse Champions programme in partnership with other rural Gloucestershire districts and Gloucestershire Domestic Abuse	Feb-24	Mar-25	Cllr Claire Bloomer Joseph Walker	Complete	The Rural Domestic Violence Awareness Programme funding ran until June 2025 so the project has concluded. GDASS is looking for continuation funding, but continues to offer support and training across the County.
		Train frontline staff to identify Domestic Abuse and review internal processes to recognise and support victims of abuse	Feb-24	Jul-24	Cllr Claire Bloomer Joseph Walker	Complete	The Rural Domestic Violence Awareness Programme funding ran until June 2025, so the project has concluded. However officers in key services will continue to be trained on DA where they are likely to come into contact with possible victims of DA.
		Coordinate activity under Home Office's safer Streets Fund to tackle Anti-Social Behaviour and violence against women and girls	Feb-24	Review February 2025	Cllr Paul Hodgkinson/Cllr Claire Bloomer Joseph Walker	Complete	Safer Streets funding has concluded. Moving forward, the Cotswold Community Safety Partnership will work with the OPPCC and partners to access available community safety funds

Supporting the economy	Work with partners to develop the skills of our residents	Work with key sectors to create new highly skilled jobs, through promotion of apprenticeship opportunities	Feb-24	Apr-28	Cllr Tristan Wilkinson	On Target	Officers continue to work with businesses from key sectors, including agritech, cyber/digital and sustainable aviation to promote employment opportunities. Discussions have taken place with key stakeholders about how to promote apprenticeship opportunities articles about apprenticeships have appeared in recent Business Matters newsletters. Apprenticeships are being promoted as a way of mitigating higher employers' NI contributions. A project around youth enterprise and employment, led by Cirencester Chamber of Commerce, is being supported in 2025-26 through UKSPF.
				Joseph Walker Paul James			
		Deliver a programme of activities in year 3 of the Shared Prosperity Fund to help those furthest from the employment market	Apr-24	Mar-25	Cllr Tristan Wilkinson	On Target	This project was delivered through Gloucestershire County Council's Employment and Skills Hub Outreach programme in partnership with The Churn Project with agreed outputs and outcomes. An additional year of funding for the project has been agreed for 2025-26 working directly with The Churn Project. Regular monitoring meetings are held and the project is performing in excess of its targets.
					Joseph Walker Paul James		
	Attract and manage investment to boost the local economy	Consider the results of the digital and green survey of community buildings, and enable improvements through Rural England Prosperity Fund	Apr-24	Mar-25	Cllr Tristan Wilkinson	On Target	14 projects were allocated funding by the REPF grant scheme for village halls in 2023-24 and 2024-25 and all are now completed. A number of other village halls will be receiving funding for similar projects from UKSPF/REPF in 2025-26.
					Joseph Walker Paul James		
	Support local businesses and farms, to enhance the vibrancy of our towns and villages, and to manage the opportunity and impact of the visitor economy	Continue to deliver against the six priorities set out in the Cotswold Tourism destination management plan	Jan-24	Mar-25	Cllr Tristan Wilkinson	On Target	Three UKSPF funded projects are now underway: one to identify and promote businesses as Sustainability champions; one to encourage the development of new experiences; one to bring enhancements and new functionality to the tourism website (www.cotswolds.com)
				Joseph Walker Chris Jackson			
		Continue to support the Local Visitor Economy Partnership, to ensure better coordination of tourism activity and delivery against national growth targets	Jan-24	Review January 2025	Cllr Tristan Wilkinson	On Target	Seven workstreams have been agreed by the partnership, each with an agreed action plan: these include two sustainability strands (one on transport & active travel, the other on business practices & biodiversity), business support and travel trade.
					Joseph Walker Chris Jackson		
	Work with local and county partners to grow a strong and sustainable economy	Undertake a refresh of the Green Economic Strategy	Feb-24	Apr-24	Cllr Tristan Wilkinson	Complete	Completed
					Joseph Walker Paul James		
		Continue to support the development of the Royal Agricultural University's Innovation Village	Jan-24	Jan-25	Cllr Tristan Wilkinson	On Target	The outline planning application was received in April 2024. Officers and representatives from the RAU and its advisers continue to meet in order to resolve outstanding issues including comments from consultees, particularly highways. It is hoped the application will be able to be determined in the next couple of months.
					Joseph Walker Paul James		
		Continue to work with The Growth Hub to support existing businesses and encourage the growth of start-ups, with a focus on the outreach provision supported by the Shared Prosperity Fund	Jan-24	Mar-25	Cllr Tristan Wilkinson	On Target	Officers meet monthly with representatives from the RAU/Growth Hub to monitor progress against outputs/outcomes and are pleased with progress against targets. Cirencester Growth Hub is, by a number of measures, the most successful Growth Hub in the network. Outreach Navigators continue to work across the district and have held a number of events and discovery meetings at the Moreton Area Centre, which are being well-supported. Cabinet has agreed another year of funding for 2025-26. Thought is now going to what will happen
					Joseph Walker Paul James		



# COTSWOLD

## District Council

COUNCIL PRIORITIES REPORT

**April - June 2025**

# Our Cotswolds, Our Plan 2024-28

## Our Ambition

To tackle some of the big challenges faced by our residents while providing a good level of key services.

## Our Priorities



**Delivering Good  
Services**



**Responding to the  
Climate Emergency**



**Delivering Housing**



**Supporting  
Communities**



**Supporting the  
Economy**

## Executive Summary Highlights

- The Council received strong feedback from the LGA Corporate Peer Challenge Progress Review, recognising improvements in governance, scrutiny, and service delivery, including the successful completion of Phase 1 of the Publica transition.
- The Planning Advisory Service (PAS) Peer Review confirmed improved performance, with the Council no longer at risk of designation. A 13-point action plan is being implemented, including new enforcement processes and Biodiversity Net Gain (BNG) requirements.
- Council emissions have reduced by 41% since 1990. A new Climate Board has been established to accelerate progress toward the 2030 net-zero target.
- The Renewable Energy Study was endorsed by Cabinet and will inform Local Plan updates and future climate policies.
- The Spring round of Crowdfund Cotswold launched five projects, with strong community engagement, including over 150 pledges for the Phoenix Festival.
- The Summer Holiday Activity and Food (HAF) programme launched with a new booking system, alongside 14 Strengthening Communities events funded through a £50,000 grant.
- The Cotswold Food Network continues to lead on food sustainability, launching new guides, outreach campaigns, and a venison supply project to support food charities.
- Cirencester town centre vacancy rate improved to 4.8%, with new businesses opening and the former House of Fraser now occupied by Monastery & Co.

## Delivering Good Services



### The Context

As a council, our purpose is to provide vital services to our residents, businesses, and visitors. The council is committed to delivering services effectively and efficiently, ensuring they reflect our dedication to addressing climate change and offering value for local taxpayers. The council's services will uphold high standards and deliver value for money. We will collaborate with our contractors and partners, including town and parish councils, to sustain valuable services and contribute to the preservation of the Cotswolds environment that we all take pride in.

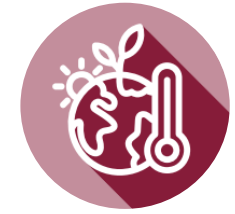
### Actions we are taking

During the quarter, the Council received strong and encouraging feedback from the Local Government Association's Corporate Peer Challenge Progress Review. The review team recognised the Council's commitment to improvement, highlighting significant progress since the original 2022 review. Notable achievements included strengthened governance arrangements, a revised and streamlined Constitution, and a well-received councillor induction and training programme. The Overview and Scrutiny function has also been revitalised, now playing a more focused and constructive role in shaping policy and holding decision-makers to account. The successful completion of Phase 1 of the Publica transition, bringing around 70 staff back into the Council, was acknowledged as a major milestone. The review encouraged the Council to take time to reflect on lessons learned before progressing to future phases, ensuring that staff are supported and that the transition continues to align with strategic goals.

In parallel, the Planning Advisory Service (PAS) Peer Review provided a focused assessment of the Planning Service, identifying both strengths and opportunities for further development. The service was commended for its improved performance, with the Government confirming that the Council is no longer at risk of designation for underperformance. Building on earlier work to improve the pre-application service, validation processes, and communication with applicants, recent efforts have centred on reducing enforcement backlogs and introducing a new online enforcement form. These changes are expected to reduce repeat contact, improve triage, and streamline case handling. The service is also preparing for the delivery of Biodiversity Net Gain (BNG) requirements, with new processes now live to support this. A comprehensive action plan has been developed to implement the 13 recommendations from the review, covering areas such as internal communication, digital innovation, stakeholder engagement, and financial transparency. Progress will be monitored quarterly by the Cabinet Member and annually by the Planning Committee to ensure continued momentum and accountability.



## Responding to the Climate Emergency



### The Context

The climate crisis, and the related ecology crisis, present an existential threat to all Cotswold district residents, but particularly our young people, and future generations beyond them. There is an urgent imperative to act. The Intergovernmental Panel on Climate Change (IPCC), have repeatedly outlined the catastrophic impacts that people and nature will face should the world warm by 2 degrees. They plead to limit global temperature rise through urgent, unprecedented, systemic change to halve emissions by 2030 and reach net zero emissions by 2050 at the latest. Cotswold District Council's climate strategy set a 2020-2030 timeframe, reflecting the importance of this crucial 'Decade to Make a Difference'. The Council's Climate Emergency Strategy of September 2020 identified the Council's different spheres of influence over carbon emissions. These range from emissions under the council's control (for example emissions produced from its own operations) through to those it can have an influence over by enabling District-wide climate mitigation action. Here below is a summary of actions we are taking in response.

### 'Direct Control' actions

The Council's Climate Emergency Strategy of September 2020 contained a target to make emissions from the Council's own operations net-zero carbon as soon as possible, aiming for an 80% reduction by 2030 against a 1990 baseline, and a 100% reduction by 2045. The Council has been working hard to build the evidence base to be able to assess progress against this target and has now been able to complete the exercise up to FY22-23. The progress report was presented at July 2025 Cabinet. It revealed that to date carbon emissions have reduced 41% against the 1990 baseline year, from 4,700,000 kg CO<sub>2</sub>e in 1990 to 2,763,803 kg CO<sub>2</sub>e in FY22-23. It demonstrates action to date can be seen to have led to tangible results. Cabinet (July 2025) also approved the formation of a Climate Board to enable the Council to turbocharge action towards meeting the Council's 2030 reduction target. Activity to reduce the council's operational carbon emissions continues. An energy audit (using internal staff resource) has been commissioned on the Trinity Road building to identify a portfolio of energy and carbon savings. All councils who own a stake in Ubico are in the process of agreeing to undertake a waste fleet EV transition feasibility study to equip councils' with information on feasibility and cost of transition. This is part of a suite of actions to assess how the waste fleet can be decarbonised in the most cost-effective, carbon-effective and practical manner. A business case has been agreed and an offer has been made to New Brewery Arts for the provision of solar PV.

## **‘Indirect Control’ actions**

Work is progressing with preparing the climate change policies of the partial update of the adopted Local Plan for a final stage of public consultation, ahead of submitting the updated policies to the Secretary of State for examination in public. This work has included consideration of feedback to the previous public consultation on the draft Local Plan, and taking on-board the findings of evidence base studies that inform the policy updates. Part of the work to underpin this has involved the creation of a Renewable Energy Study. This was presented to Cabinet in May. Cabinet resolved to endorse the Renewable Energy Study for use as both part of the evidence base for the review of the Local Plan; and part of the evidence base for future Council policies and procedures in regard to responding to the Climate and Ecological Emergencies. The study contained an assessment of existing and potential renewable energy resources (including a Landscape Sensitivity Assessment) across the district as well as an assessment of current and projected future energy demands and emissions in Cotswold District. It considered renewable energy deployment scenarios and opportunities within Cotswold District alongside the benefits and challenges of renewable energy development in relation to environmental, social and economic impacts on the local area and its assets. A suite of strategic recommendations for renewable energy development was produced alongside specific energy policy recommendations to underpin proposals for policies in the Local Plan review and for future revisions up to 2041, to reflect the district’s net zero ambitions for consideration in the current Local Plan review.

To help building owners and tenants improve the energy efficiency and climate resilience of their buildings, the Local Planning Authority produced some guidance specifically for listed buildings, buildings located in a conservation area and those which are traditionally built. The guidance provides a general introduction to the topic, highlighting key points to consider when considering making energy efficiency and climate adaptation improvements to a building, and to provide guidance about where to go for good quality, independent advice, as well as where to find suitably qualified tradespersons.

## **‘Place Shaping’ actions**

### EV charging infrastructure provision

The Council is working to provide residents without off-street parking with EV charging facilities to enable the uptake of EVs across the District. Plans to install electric vehicle charge points in Council-owned carparks have progressed. The Council have entered into a contract with Connected Kerb for delivery of EVCPs in 4 Council owned car parks in Tetbury, Cirencester, Stow-on-the-Wold and Moreton in Marsh respectively. Installation within these car parks is currently taking place and is due to be completed by September.

### Solar PV support

The Council is also working to enable residents to install solar PV by helping them to understand their options, find a reliable installer and secure a fair price through the Cotswold Home Solar scheme. The scheme continues to be promoted and delivered. As a result of the scheme 27 homes have already installed solar panels, and a further 18 have paid a deposit. Residents are on track to save nearly £450,000 across the district.

### Energy efficiency support

Low carbon retrofit of the District's domestic building stock is an essential component of national emissions reduction but remains a huge challenge. The Council is undertaking significant work in this area. In partnership with all other Gloucestershire authorities, a contractor has been procured to provide a Gloucestershire-wide retrofit support offer for residents. The service launched on the 22nd of January and offers residents the opportunity of a whole house energy efficiency plan, project specification and vetted installer selection as well as an installation management service. In addition, a Cotswold District Retrofit Engagement Officer has been recruited to engage communities directly and provide a series of awareness raising events and bespoke advice between now and September 2025. In March we delivered Drive and Thrive event at the Corn Hall which provided residents with the opportunity to see feel and touch low carbon home technologies. The programme of retrofit engagement events is available to view here <https://www.cotswold.gov.uk/environment/climate-action/retrofit-engagement-scheme/>. We have also reappointed Contractor Severn Wye Energy Agency (SWEA) to deliver free energy efficiency advice service specifically for low-income households via the Warm and Well Scheme until 2027.

### Net zero energy planning

The Council is also working in partnership with other Gloucestershire-based councils on Local Area Energy Planning which is vital to enabling net zero within Cotswold District since it is needed to build the case to District Network Operators for investment and expansion in electricity grid infrastructure. A contractor has been appointed to undertake the first 3 stages (of 7) required for Energy Planning and is currently carrying out stakeholder engagement exercises and energy baselining. In tandem we have launched our engagement with Distribution Network Operators (DNOs)/Distribution System Operators (DSOs), Northern Powergrid (NGED) & Scottish and Southern Electricity Networks (SSEN), to inform their Distribution Future Energy Scenarios (DFES) 2025 projections to ensure electricity grid infrastructure is adequate to meet our net zero ambitions.

### Transport decarbonisation

Work also continues through Climate Leadership Gloucestershire on delivering the Statement of Shared Intent (SoSI) in which all seven local authorities expressed an ambition to reduce surface transport emissions by 80% by 2030 and to reach net zero by 2050. Gloucestershire councils are strengthening their collaboration regards EV charging infrastructure by considering opportunities for enhanced coordination. Life Cycle have been administering the Take a Stand

scheme in the Cotswolds since 2022, showing the commitment of the council to encourage sustainable travel in the region. With CDC support, 78 cycle parking stands have been installed recently across a number of locations in the Cotswold District.

#### Affordable housing

We are strengthening our partnership with Bromford to ensure existing homes and communities are resilient and ready to respond to the challenges presented by the Climate Emergency.

#### **‘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 staff to residents and from businesses to public sector bodies. We regularly run communication engagement campaigns to encourage behaviour change amongst District stakeholders. For example, in January 2025 a campaign was run to encourage people and showcase the small positive changes that can be made for the environment.

We continue to provide funding for a business net zero engagement support programme. We have also relaunched Crowdfund Cotswolds which supports and enables local communities to invest in carbon reduction technology and activity. Carbon literacy training continues to be rolled out to staff and councillors. We also developed a web resource to communicate to all stakeholders on the work of the council regards climate change. Finally, a District-wide network of individuals and organisations motivated by the climate challenge has been formed, aiming to replicate the success of West Oxfordshire District Council’s ‘Green Light’ communications platform.

## Delivering Housing



### The Context

The high-quality natural and built environment of Cotswold District continues to make it an exceptionally desirable place to live. The area's scenic landscapes, historic towns, and strong sense of place contribute to its enduring appeal. This is reflected in the high proportion of homes owned outright—37.8% compared to the national average of 30.6%—which highlights the District's attractiveness as a location for retirement and second home ownership.

However, this desirability has contributed to significant pressures in the local housing market. As of May 2025, the average property price in Cotswold District was £419,000, which is substantially higher than the UK average of £269,000. While this represents a 5.7% decrease from the previous year, prices remain among the highest in the South West. For first-time buyers, the average price was £323,000, and for mortgage buyers, it was £429,000.

Rental prices have continued to rise. As of June 2025, the average monthly private rent in Cotswold was £1,175, up 1.8% from the previous year. This is slightly below the UK average of £1,344 but still represents a significant burden for many local residents, especially given the lower-than-average local wages. There is a notable shortage of good quality, genuinely affordable rental accommodation across the District.

Affordable housing plays a critical role in addressing local housing needs and encompasses both low-cost home ownership options and rental properties typically offered at around 80% of market rent. However, even these discounted rates may remain unaffordable for many households, particularly those on lower incomes or with limited access to financial support.

Social rented housing, which is offered at lower rents than affordable rent, provides a vital safety net for residents on the lowest incomes or those in receipt of full Housing Benefit. These homes are essential in ensuring that the most vulnerable members of the community have access to secure and stable housing.

The combination of relatively high house prices, rising rents, and lower-than-average local earnings creates a significant and persistent challenge around housing affordability. This issue is being further exacerbated by the broader cost of living crisis, which is reducing disposable incomes and increasing financial insecurity for many households.

Adding to the pressure, the government's revised standard methodology now requires Cotswold District to deliver 1,036 homes per year, more than double the previous target. However, the District currently only has a 1.8-year housing land supply, well below the five-year requirement. This shortfall is likely to increase demand and competition for housing, further intensifying affordability challenges.

## **Actions we are taking**

The Council's Affordable Housing Delivery Strategy and Action Plan, adopted by Cabinet on 8 February 2021, sets out a clear framework for accelerating the provision of social rented and affordable homes for local people. The current focus remains on facilitating affordable housing delivery through the Local Plan, rural exception sites, and community-led housing initiatives. The Council continues to work closely with Housing Associations to maximise delivery and is committed to going further by enabling and directly intervening in the market—potentially through the provision of land and funding.

In line with the Council's Climate Change emergency commitment, any development acquired or built by the Council must be carbon zero. While this requirement increases upfront costs, it significantly reduces ongoing revenue costs for tenants, particularly through lower energy bills.

Following the outcomes of the councillor workshop in October 2020, discussions with local Registered Providers (RPs), and a review of delivery options, Officers recommended the establishment of a formal partnership with a lead RP. This has led to the development of a Partnership Framework with Bromford, aimed at increasing affordable housing delivery across both new-build and regeneration sites. Engagement is also underway with Homes England to explore a package of measures to improve the potential for rural affordable housing delivery in the District. A pipeline of approximately eight rural affordable housing sites is currently being developed.

One exemplar project is the carbon zero affordable housing development in Down Ampney, which will deliver 13 social rented homes. The scheme involves a vacant plot owned by the Council and a neighbouring site with domestic garages owned by Bromford. The homes will feature roof-mounted solar PV panels, ensuring low utility bills for tenants. Planning consent was granted on 12 March 2025. However, Bromford is currently resolving surface water drainage design issues and coordinating with Thames Water regarding infrastructure upgrades. Unless Thames Water accelerates its plans, the start of construction may be delayed until 2027. Heads of Terms for the CDC land transfer and the Section 106 agreement are currently being negotiated.

Regarding the Old Station and Memorial Cottages on Sheep Street, the Old Station was previously assessed for service provision, including homelessness accommodation, but was found to be financially unviable for conversion. Despite efforts to identify cultural or community uses, no affordable scheme emerged. In July 2024, the Council decided to market both properties for sale. The sale of the Old Station was successfully completed on 11 April 2025 enabling the building to be brought back into use. The sale of the Memorial Cottages is still pending, with completion expected following the removal of the parking order in July/August 2025. The successful bidders are engaged in the legal process, and once completed, the buildings will be brought back into productive use.

## Supporting Communities



### 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 through investment in our stock of leisure facilities and other non-facility interventions. In March 2021, the 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 is being monitored by the Active Cotswolds Programme Board and reported to the Portfolio Board.

### Crowdfund Cotswold

Crowdfund Cotswold remains a key mechanism for supporting community-led initiatives across the District. Delivered in partnership with Spacehive, the programme empowers local groups, organisations, and residents to raise funds for projects that enhance community wellbeing, infrastructure, and cultural life. The Council provides match funding to eligible projects, helping to unlock additional financial support and increase the likelihood of successful delivery.

As part of the Spring 2025 round, five projects were launched. One has already been completed, while the remaining four are actively fundraising. Among these, the Phoenix Festival has attracted particularly strong community engagement, with approximately 150 individual pledges of support. This level of participation reflects the value placed on cultural events and the effectiveness of Crowdfund Cotswold in mobilising local support. The Council continues to promote the platform as a vital tool for enabling grassroots improvements aligned with local priorities.

#### Holiday Activity and Food Programme & Strengthening Communities Events

Funding for the Holiday Activity and Food (HAF) programme has been extended for 2025. Following a successful Easter delivery, the Summer HAF programme has now been finalised, with the new booking system launched on 30 June 2025. Families and carers can access a wide range of activities and events through World Jungle and other local providers, ensuring children and young people remain active, engaged, and supported throughout the summer months.

In anticipation of potential gaps in HAF provision, the Council secured £50,000 through the Strengthening Local Communities Fund to deliver 14 community events across 2025, evenly distributed between the north and south of the District. These events are designed to be multi-generational, offering activities for children, young people, and adults, alongside information and support from key local organisations. All events include food provision and are delivered in collaboration with local community champions, using an Asset-Based Community Development (ABCD) approach to ensure they are tailored to the specific needs of each community.

Alongside the Summer HAF programme, the next two Strengthening Community Events are scheduled to take place in Blockley and Cirencester. To date, events have already been successfully delivered in Moreton-in-Marsh, Cirencester, Bourton-on-the-Water, Fairford, Chipping Campden, and Tetbury, with over 400 residents participating. These events have provided a welcoming and inclusive environment for residents to enjoy a fun, relaxing, and informative afternoon. They have also created valuable opportunities for stallholders and service providers to engage directly with the community, share information, and explore collaborative approaches to improving outcomes for local people.

Each event also includes a community feedback forum, offering residents of all ages the opportunity to share their views on what works well in their area and what could be improved. This feedback is helping to shape future activity and ensure that services are responsive to local priorities.

#### Cotswold Food Network (CFN)

The Cotswold Food Network (CFN) continues to lead and coordinate efforts to improve food sustainability and resilience across the District. Its work is currently focused on two key themes: financial inclusion and cost of living, and food provision support.



A Food Network Event is scheduled for July 2025, where updates will be shared on key financial inclusion topics including the Household Support Fund, Department for Work and Pensions (DWP) updates, the Council's Revenues and Benefits work, and the Advice First Aid programme. To support targeted outreach, the Council is using the Low-Income Family Tracker (LIFT) to identify households in need. The current campaign focuses on fuel and water poverty, aiming to connect residents with support and reduce financial hardship. A revised version of the "Worrying About Money?" leaflet, tailored specifically for the Cotswold context, has been produced. 4,000 printed copies have been distributed to local organisations and community venues to ensure wide accessibility.

In support of food provision, the CFN has developed a Food Procurement Guide to promote best practices for food sourcing at meetings and events, with an emphasis on local procurement and waste reduction. A complementary Allotments Mini Guide has also been produced to encourage local food growing. A Cookery Classes Guide, detailing free and low-cost cookery classes available across the District, has been drafted and will soon be published. This resource will be mapped using GIS and will include a list of recommended local caterers. In response to ecological and food access challenges, a Venison Supply Project is currently being scoped. This initiative aims to address deer overpopulation while supplying free venison meat to food provision charities. Monthly newsletters are produced and distributed to the CFN's food provision and growing network mailing list, ensuring stakeholders are kept informed of developments, opportunities, and resources.

### Community Building

The Council continues to support the Cotswold Youth Network in its efforts to enhance mental health and youth services across the District, fostering collaboration among local organisations. Recent work includes supporting Northleach Teen Space with team training and the introduction of targeted interventions from the Ernest Cook Trust, aimed at improving outcomes for young people.

Support for Digital Inclusion also remains a priority. The Council has provided ongoing assistance to the Digi Hubs, and has recently handed over delivery of the 'Getting Connected' and 'Staying Connected' digital skills courses, enabling the hubs to continue this work independently and sustainably.

The Strengthening Communities events have been well received, with positive feedback from both residents and partner organisations. These events provide valuable opportunities to engage with communities on a range of topics including the cost of living, health and wellbeing, community development, and social isolation. The Council continues to collaborate with a wide range of partners—including the NHS, Citizens Advice, Cotswold Friends, The Churn Project, Gloucestershire Fire & Rescue, Falls Prevention, Foodbanks, and the Carer's Hub—to build on the success of the Community Building Roadshow held in 2024.

That initiative provided residents with access to advice, support, and signposting, while also enabling the Council to gather valuable insights into how people feel about their communities.

# Supporting the Economy

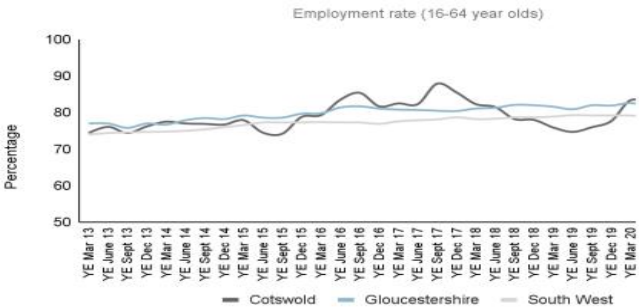


## The Context

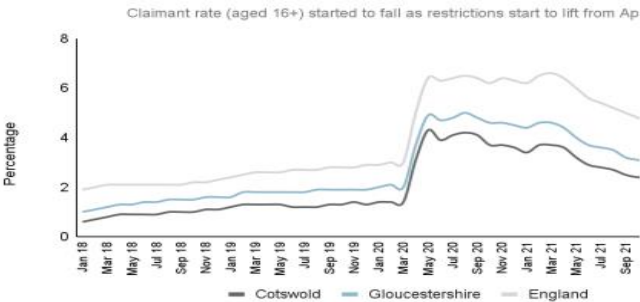
The District supports an economically active population of an estimated 42,600 and has strengths in finance and business services, ICT including science and technology, retail, and accommodation and food services. Around 90% of businesses are micro businesses employing fewer than 10 people. Median wages for people working in the district are below the national average, and affordability of housing is a significant issue for the district, which can result in skill and labour shortages.

Historically, unemployment has been relatively low but increased during the pandemic. It has fallen back significantly and now stands at just under 2% - the lowest in the county, but still slightly above the pre-pandemic level. The claimant count did see a proportionally significant rise in February 2025 of just over 100 (based on around 1000 total unemployment). This is believed to be due to businesses anticipating the employers’ national insurance rise. It has dropped back very slightly since then.

The national and global economies have faced uncertainty as a result of the Russian invasion of Ukraine and sharply rising prices, particularly for energy, fuel and food, which continues to impact on disposable income and living standards. Although energy and fuel costs, and the overall inflation rate, have dropped back, prices are still significantly higher than prior to the invasion.



Source: ONS, Annual Population Survey

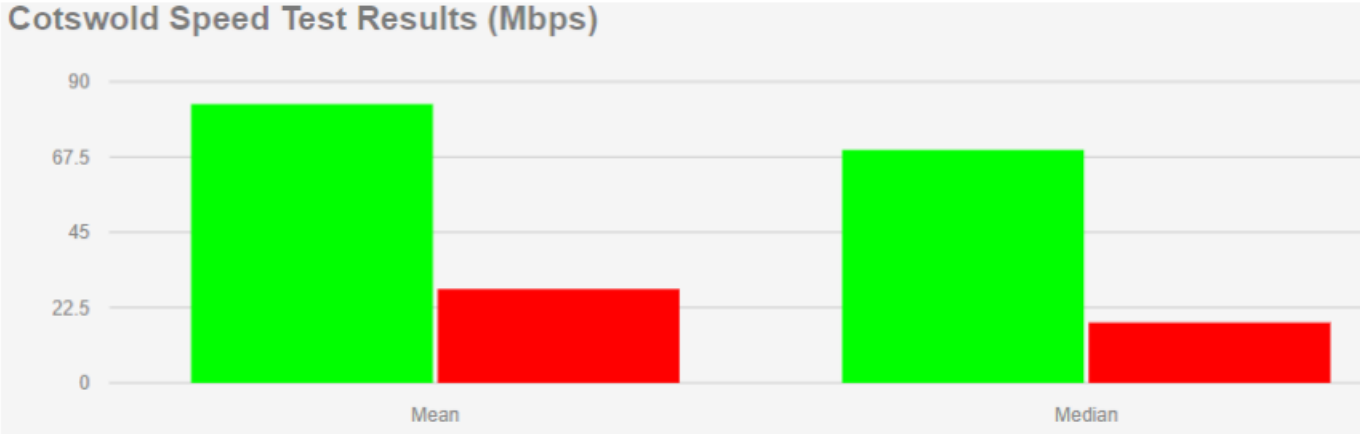
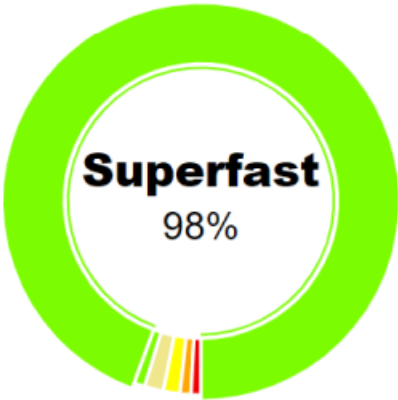


Source: ONS, Crown Copyright Reserved (Nomis)

The number of job postings remains high, reflecting continuing challenges in recruitment, but has fallen back from its peak. 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. 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 has been working with the Fastershire Project to address these areas. The Fastershire Project ceased at the end of March 2024 and has been replaced by Project Gigabit, run by BDUK. The contract for Project Gigabit’s ‘Lot18’, which includes parts of the Cotswold District was awarded to Gigaclear in February 2024.

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 and now stands at over 70%. This reflects the ongoing work by the infrastructure providers and the fact that commercial activity is concentrated on providing a full fibre service to the ‘easier to reach’ areas whereas the last 1.4% who do not yet have superfast broadband fall firmly within the ‘difficult to reach’ category.



Much of our work to enable a vibrant economy will be achieved in partnership with key stakeholders ranging from the County Council to 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 refreshed Green Economic Growth Strategy 2025-29 was adopted by Cabinet in March 2025. It sets out the challenges and issues for the district and how they will be addressed. The strategy has been informed by the Gloucestershire Economic Strategy, which was approved by the County Council's Cabinet in May 2024 and was noted by the new City Region Board in September 2024.

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 Club, the Federation of Small Businesses and Gloucestershire County Council. Most recently, the Group met at the Cotswold Casement Co Ltd in Moreton-in-Marsh and heard about the North Cotswolds Awards (as the name suggests, a set of business-related awards covering the North Cotswolds) and about the Cotswold Catalyst programme, run by the Cirencester Growth Hub, which provides intensive support and advice to five local businesses who have potential for growth.

In 2022, the Council was awarded £1 million over three years from the UK Shared Prosperity Fund (UKSPF) 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. Completed projects including 'Clean and Green' initiatives, new offices at The Growth Hub/Farm49, a feasibility study and works to the Old Station building in Cirencester, works to restore the clocktower on the Redesdale Hall in Moreton-in-Marsh, a significant contribution to bringing the former House of Fraser in Cirencester back into use and a new website for the Cotswold Lakes area to reflect its change in branding from the Cotswold Water Park. Cabinet in March 2023 agreed to allocate up to £135,000 a year for 2023-24 and 2024-25 to the Growth Hub in Cirencester to provide business support. One positive benefit of this funding is that the Growth Hub has been able to expand its outreach programme across the district, particularly in the north in areas like Moreton-in-Marsh and Chipping Campden. The

Business Navigators for the outreach programme have been using the Council's Moreton Area Office as their base when working in the area. A number of events have taken place in the north of the district.

The Council has been awarded a further £327,146 from the UK Shared Prosperity Fund for 2025-26. Cabinet has already agreed to fund the Growth Hub and the initiative with The Churn Project to help people furthest away from the labour market into jobs, training and volunteering. An open application process was run for the remaining unallocated funding of around £120,000 and decisions have now been made on which projects to fund .

A further £764,292 was allocated to the Council from the Rural England Prosperity Fund over the 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 2023. The approach has been to allocate funding for business grants, for active travel and for community projects, including assisting village halls with sustainability-related improvements. The Council procured a delivery partner for the business grants (ALP Synergy Ltd) and the village hall grants (GRCC – formerly Gloucestershire Rural Community Council) jointly with the Forest of Dean District Council. All of the business grant-funded projects have now been completed. Fourteen grants for village halls have been approved and all of these projects have been delivered. A number of active travel and community and heritage buildings applications have been approved, with the projects in question now completed.

A further £229,240 has been allocated to the Council from the Rural England Prosperity Fund for 2025-26. A report to Full Council in May agreed the approach to using this funding. An open application process was run, which closed on 16th June. Applications were received requesting over £750,000. The majority of available funding has now been allocated and decisions published, but a relatively small amount of funding remains to be allocated and a number of applications are still under consideration.

Town centres are crucial, both economically and for civic pride. The number of vacant retail units in town centres serves as an indicator of their health and reflects the Council's efforts to support their recovery from the COVID-19 pandemic. A survey conducted in August 2021 revealed that Cirencester had a town centre vacancy rate of 11%, which was three percentage points below the national average. This rate improved to just under 6% in April 2022 and to just under 5% in October 2022. At the end of April 2025, the vacancy rate stood at 4.8%, with several of the remaining units either under offer or undergoing refurbishment. The former House of Fraser in the Market Place, which was the longest-standing vacant building, has now been leased to the Grace Network who have now opened under the branding of Monastery & Co. The building houses a number of social enterprises including food-related, bikes, children's clothes and second-hand furniture. A number of other new entrants have opened in the town, including The White Company, The Works and a number of independent businesses. In the smaller towns within the district, vacancy rates are generally low, though even a few vacancies can significantly impact

percentages. Currently, there are no major concerns, but we remain vigilant about the pace of high street changes and the potential effects of the cost-of-living crisis. We will continue to monitor these developments closely and, indeed, are planning to undertake an initiative in the three towns where vacancies are at the highest level (Lechlade, Moreton-in-Marsj and Tetbury), to try to understand the reasons for this and what can be done to counter it. The conversion of retail spaces to residential use in smaller towns is also a concern as it may impact the town's 'critical mass' and its ability to attract visitors.

The Cotswolds.com website, managed by the Council's Tourism Team, remains firmly established as the leading online destination for the Cotswolds, consistently ranking number one on Google. Over the past 12 months, the site has attracted 1.6 million users and generated 3.8 million page views, reflecting its central role in promoting the region to domestic and international audiences.

To maintain and enhance this position, Cotswolds Tourism has successfully secured two funding streams: UK Shared Prosperity Fund (UKSPF) support for website enhancements, and a Visit England Asset Creation Grant via the Local Visitor Economy Partnership (LVEP) 1 2. The Asset Creation Grant has enabled the commissioning of new imagery to refresh and enrich the site's visual appeal. Meanwhile, the UKSPF funding is being used to deliver a visual redesign and introduce new functionality, including a microsite builder. This will allow for improved promotion of strategic priorities such as sustainability, accessibility, and specialist interests. Development work is underway, with the upgraded site expected to go live by the end of summer 2025 3.

Additional UKSPF funding has been secured to support the creation of Sustainability Champions, representing diverse sectors of the visitor economy. These champions will act as exemplars, sharing best practices and encouraging more sustainable approaches across the industry. The Help to Thrive initiative is also being delivered, supporting businesses—both within and beyond the traditional visitor economy—to develop new visitor experiences and improve their reach through digital marketing and engagement with trade and group travel markets.

Cotswolds Tourism continues to operate as a membership-based organisation, with all marketing activity funded through membership income. Membership currently stands at 418 businesses, generating £100,000 in income over the past year. The primary marketing channels remain the Cotswolds.com website and the organisation's social media platforms, which now boast a combined following of over 160,000. With a new Membership Manager in post, networking events have resumed, attracting over 150 businesses to the first two events.

The Cotswolds Plus LVEP, led by Cotswolds Tourism, is now fully established and recognised by Visit England as part of the national portfolio of high-performing partnerships. Seven workstreams have been agreed, covering Sustainability (public transport and biodiversity), Business Support, Data and Research, Travel Trade, Accessibility and Inclusion, and Skills and Training. This strategic collaboration is helping to shape the future of tourism across the wider region, ensuring it remains vibrant, inclusive, and economically resilient.

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 (RAU) to bring forward their Innovation Village project. The plans include teaching and research space, incubator and grow-on business units, although the exact make-up of the development is likely to evolve as the project progresses. 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 a two-year period. A public launch of the project took place on 20 January 2023 and attracted considerable media attention. The council continues to liaise actively with the university on this project. A planning application has been submitted for the scheme in April 2024 (Ref: 24/01143/OUT). It is hoped that the application will be determined within the next few months.
- The former Mitsubishi site in Cirencester, is now renamed Watermoor Point and is home to a significant number of businesses. 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 relocated from Cranfield to Cotswold Airport in 2021, is a leading innovator in decarbonising aviation and is developing a hydrogen-electric powered aircraft. The Council has been working with the Inward Investment Team at Gloucestershire County Council 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 Inward Investment Team will continue to support ZeroAvia in its ongoing growth. Other sustainable aviation businesses, such as Vertical Aerospace and S&C Thermofluids, are already based at Cotswold Airport and the council is working with the airport's owners and others to promote it as a hub for such innovative businesses.
- The Fire Service College/Capita regarding the potential for a wider Centre for National Resilience at Moreton-in-Marsh.

Kier Highways are continuing to progress the A417 Missing Link project on behalf of National Highways. The project, which at around £460m, is due to complete in 2027 and is the biggest infrastructure investment in the district and indeed the whole county for a generation. It 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. The value to the local economy is being tracked by Kier, who are using local suppliers and sub-contractors wherever possible.

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# COTSWOLD

District Council

Delivering great services locally

PERFORMANCE REPORT:

**April - June 2025**

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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 ranking against Chartered Institute of Public Finance and Accountancy (CIPFA) Nearest Neighbours model which uses a range of demographic and socio-economic indicators to identify the local authorities most similar to our own. Cotswold's identified Nearest Neighbours are Babergh, Chichester, Derbyshire Dales, East Hampshire, Lichfield, Maldon, Malvern Hills, Mid Devon, South Hams, Stratford-on-Avon, Stroud, Tewkesbury, West Devon, West Oxfordshire and Wychavon. Additional investigations are underway to provide it for those metrics that are missing comparisons.

A RAG (red, amber, green) status has been applied to each KPI to provide a quick visual summary of the status of that KPI for the quarter. Additionally, RAG status has been added to the direction of travel for each metric to show how the performance against last quarter and the same quarter compared to last year is progressing.

# A note on Standard Deviation

Standard deviation is included in this report to provide insight into the consistency of performance, not just the average results. While averages show overall trends, standard deviation highlights how much variation exists around those averages. A low standard deviation suggests performance is stable and predictable, whereas a high standard deviation indicates inconsistency, which may warrant further investigation. This helps identify areas where performance may be less reliable, supporting more informed decision-making and targeted improvements. We have used 1 standard deviation in this report to help understand variation in performance and to monitor consistency over time. This approach highlights typical fluctuations around the average, allowing us to identify patterns and potential areas of concern without focusing solely on extreme outliers.

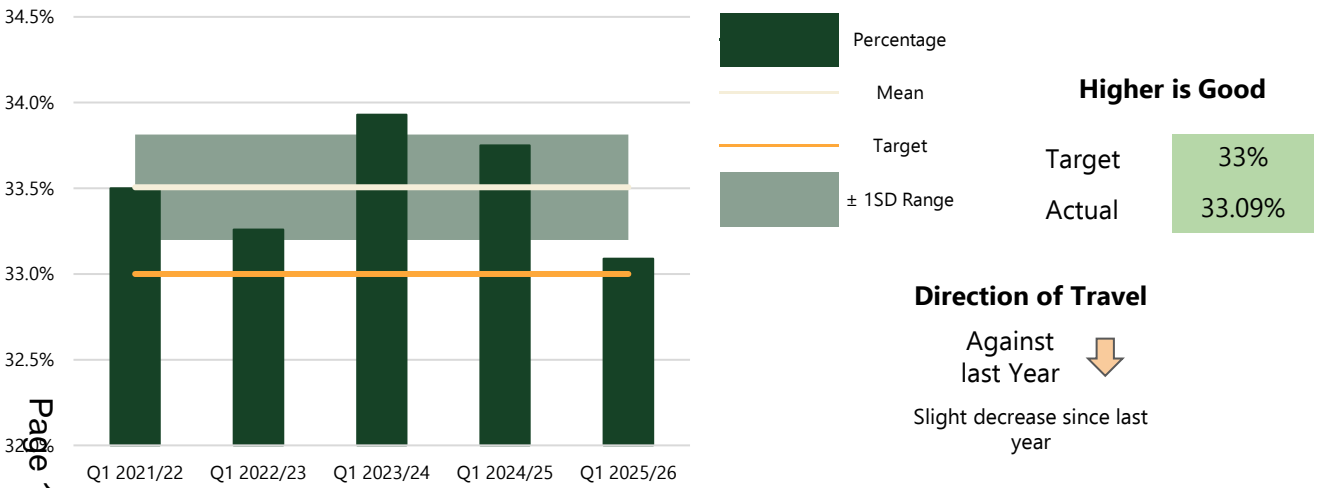
# Overall Performance

Overall, the Council’s performance in Q1 2025/26 has remained broadly positive, building on the strong foundations laid in previous quarters. Continued improvements were seen in key areas such as Council Tax and Non-Domestic Rates collection, planning determination times, and customer satisfaction. Leisure centre visits and gym memberships remained high, reflecting strong public engagement with health and wellbeing services. However, some challenges persist. Processing times for Council Tax Support and Housing Benefit change events exceeded targets, largely due to operational adjustments linked to Universal Credit automation. Additionally, the percentage of household waste recycled declined slightly, in line with seasonal patterns and national trends. The number of affordable homes delivered in Q1 was also below target, though long-term delivery remains strong.


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.

# Percentage of Council Tax Collected

[INDEX](#)



**Direction of Travel**

Against last Year 

Slight decrease since last year

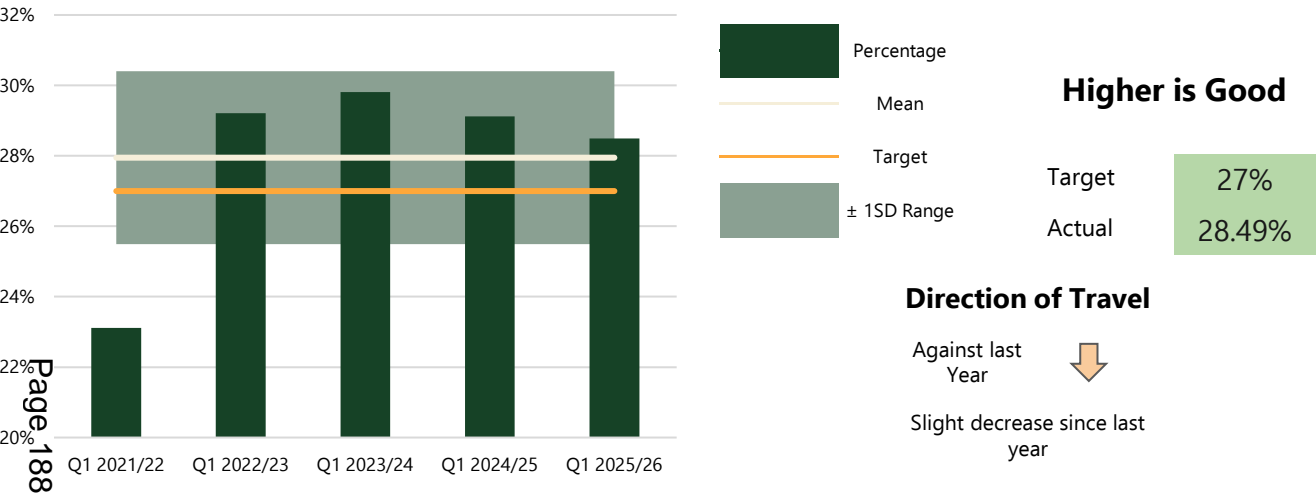
**How do we compare?**  
Benchmarking via Gov.uk Tables and Individual Council Websites using CIPFA Nearest Neighbours – Latest dataset is 2024-25 Collection Rates

2024-25 Benchmark	%	CIPFA Rank	Quartile
Babergh	99.12	1/16	Top
Tewkesbury	98.53	4/16	Top
Cotswold	98.3	7/16	Second
Maldon	97.95	12/16	Third
Chichester	97.47	16/16	Bottom

By the end of Q1, Cotswold met its 33% council tax collection target, exceeding pre-pandemic levels with a 2.1% increase, signaling a strong and sustained recovery. Operationally, the recovery timetable is fully up to date, and despite higher Q1 volumes, backlogs have been reduced to under 10 days. A growing trend of residents spreading payments over 12 months is influencing early-year patterns, but overall collection rates remain stable. The table below shows council tax collection rates for previous years alongside the outstanding balances.

	2021-2022	2022-2023	2023-2024	2024-2025	Total Outstanding
Balance at Quarter End	£608,017.14	£671,836.12	£923,672.54	£1,457,767.42	£4,106,835.64
Collected	99.35%	99.31%	99.11%	98.65%	

# Percentage of Non-domestic rates collected



**How do we compare?**  
Benchmarking via Gov.uk Tables and Individual Council Websites using CIPFA Nearest Neighbours - Latest dataset is 2024-25 Collection Rates

2024-25 Benchmark	%	CIPFA Rank	Quartile
Mid Devon	99.83	1/16	Top
South Hams	98.3	7/16	Second
Malvern Hills	97.59	11/16	Third
Cotswold	96.91	14/16	Bottom
Stratford-on-Avon	96.46	16/16	Bottom

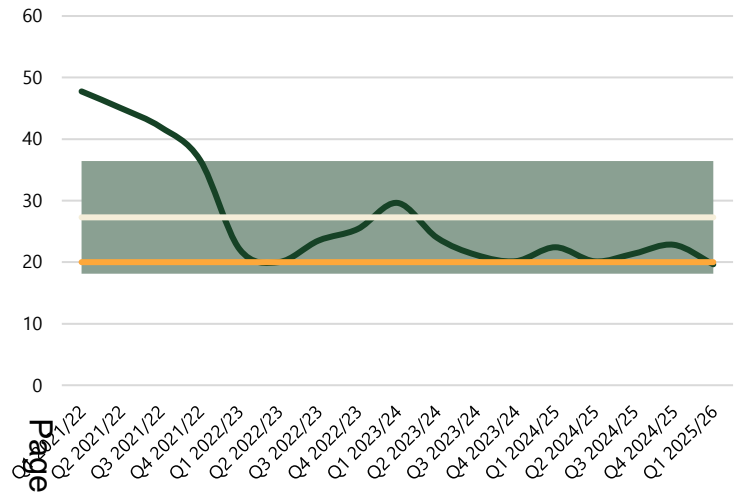
By the end of Q1, Cotswold collected 28.49%, exceeding its 27% target and reflecting steady performance. While this marks a modest decline from last year, it remains a strong result given reduced support from the Retail, Hospitality and Leisure Relief scheme. To support service delivery, staff completed targeted training across Council Tax and NDR, helping reduce backlog age and improve resilience.

The table below displays the percentage of Non-Domestic Rates collected in respect of previous years, along with the outstanding amount:

	2021-2022	2022-2023	2023-2024	2024-2025	Total Outstanding
Balance at Quarter End	£101,338.80	£210,738.01	£264,962.66	£241,635.07	£818,674.54
% collected	99.26%	99.17%	99.30%	98.21%	



# Processing times for Council Tax Support new claims



Lower is Good

Days to Process	Target	20
Mean	Actual	19.65
Target		
± 1SD Range		

## Direction of Travel

Against last Quarter



Against last Year



Decreased since last quarter and last year

## How do we compare?

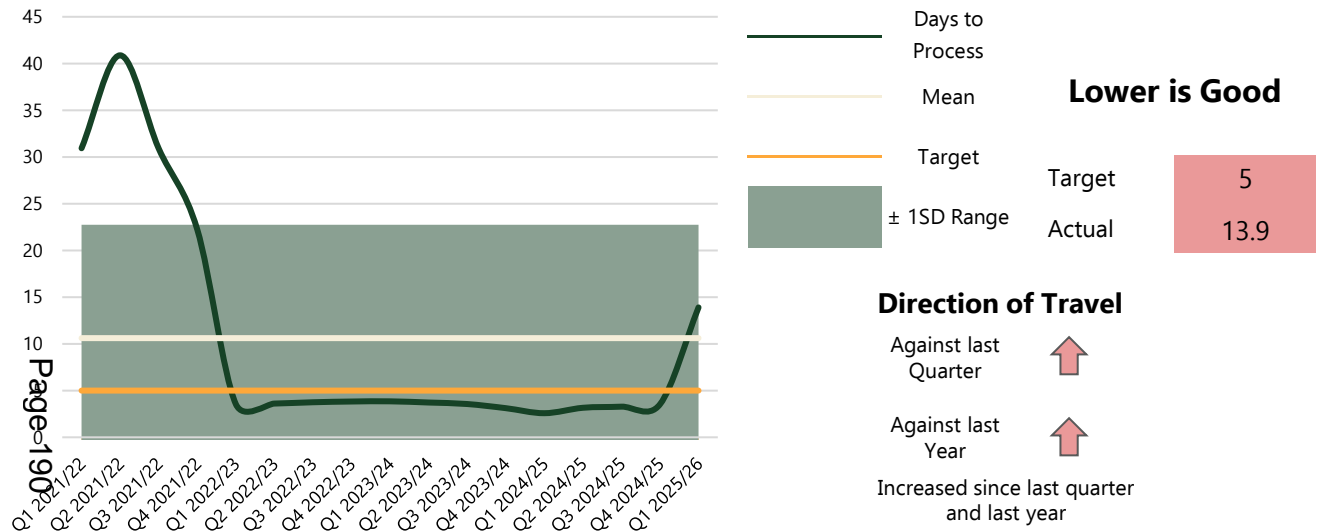
Gov.uk produces tables to show a snapshot of the number of CTS claimants at the end of each financial year. The below table shows number of claimants at the end of March 2025 and the percentage change from March 2024 for each authority.

Q4 2024-25 Benchmark	Number of Claimants at end of March 2025	Percentage Change since March 2024	CIPFA Nearest Neighbours Rank (Higher = biggest reduction)
West Devon	3,182	-2.99%	1/16
<b>Cotswold</b>	<b>3,882</b>	<b>-0.77%</b>	<b>4/16</b>
Lichfield	5,234	-0.83%	10/16
Tewkesbury	4,946	2.04%	16/16

In Q1, the Council met its 20-day processing target, averaging 19.65 days, an improvement on last year. A small year-end backlog was quickly reduced, and performance remained stable throughout the quarter. The continued downward trend in processing times reflects a strong focus on operational efficiency and customer service.



# Processing times for Council Tax Support Change Events



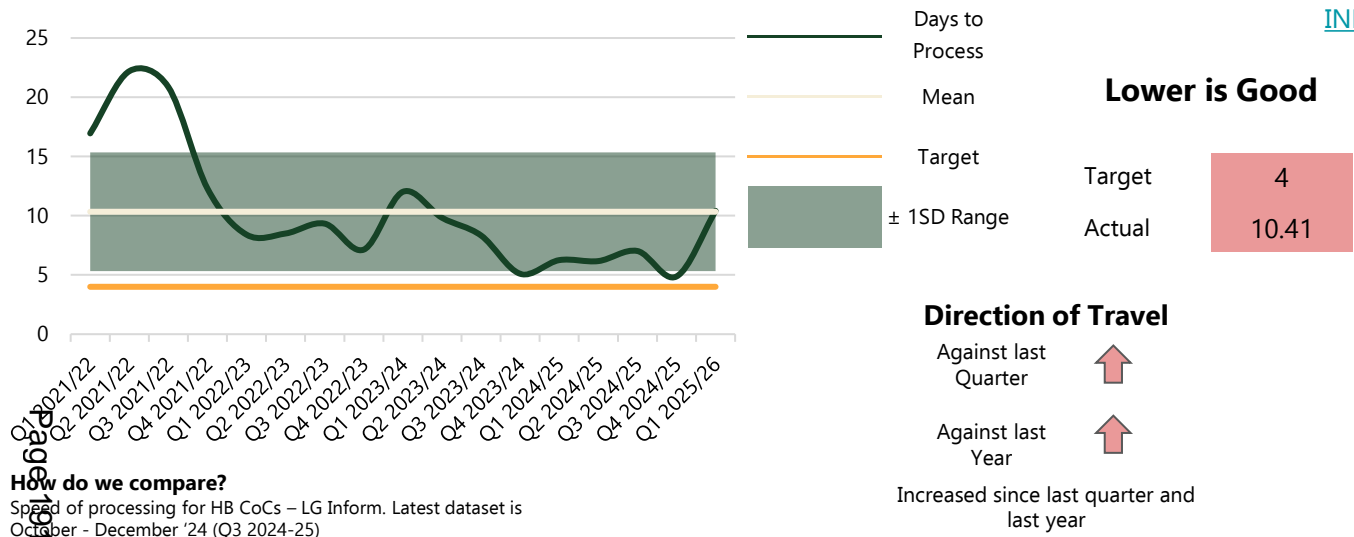
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How do we compare?  
*Benchmarking currently not available. The Data & Performance Team will investigate options.*

In Q1, Council Tax Support Change Event processing averaged 13.90 days, exceeding the 5-day target. This was due to a planned one-month pause in uploading Universal Credit (UC) applications, which served two purposes: to allow the team to focus on clearing a high volume of manual applications and to work with partners on optimising UC automation.

Before the pause, automation rates ranged from 60% to 70%. Since uploads resumed, automation has consistently exceeded 90%, with daily uploads now fully in place. As the metric is cumulative, processing times are expected to improve steadily, though likely not return to target until Q3.

# Processing times for Housing Benefit Change of Circumstances



**How do we compare?**

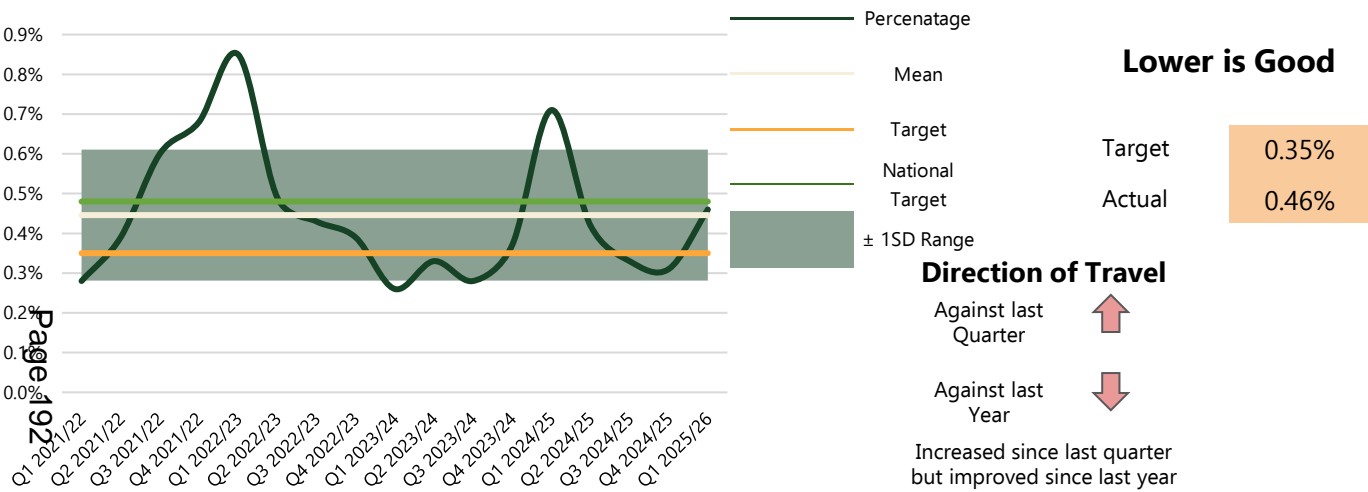
Speed of processing for HB CoCs – LG Inform. Latest dataset is October - December '24 (Q3 2024-25)

Q3 2024-25 Benchmark	Days	CIPFA Nearest Neighbours Rank	Quartile
Mid Devon	2.27	1/16	Top
East Hampshire	3.22	4/16	Top
Stroud	5.16	8/16	Second
Chichester	7.15	12/16	Third
<b>Cotswold</b>	<b>9.24</b>	<b>14/16</b>	<b>Bottom</b>
Wychavon	16.32	16/16	Bottom

Please see [Processing times for Council Tax Support new claims.](#)

In Q1, Housing Benefit change of circumstances processing averaged 10.41 days, above the 4-day target and marking a notable rise from previous quarters. This increase was driven by two main factors: the ongoing managed migration to Universal Credit, which has added complexity to remaining cases, and the planned one-month pause in UC uploads, which supported backlog reduction and automation improvements. The council continues to explore use of the Low Income Family Tracker (LIFT) tool, with further targeted initiatives under consideration to help residents access unclaimed benefits and strengthen financial resilience.

# Percentage of Housing Benefit overpayment due to LA error/admin delay



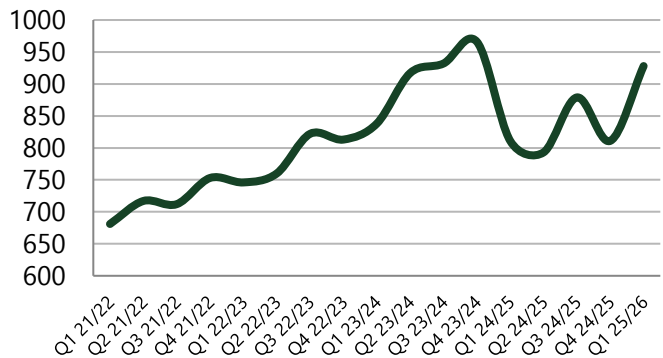
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How do we compare?  
*Benchmarking currently not available. The Data & Performance Team will investigate options.*

In Q1, Cotswold remained below the national target for Housing Benefit overpayments caused by local authority error or delay (0.48%). The overpayments recorded were mainly linked to a small number of temporary accommodation cases. While these were previously subject to full quality checks, this approach proved unsustainable. The process has since been refined to use targeted sampling, maintaining strong oversight while improving efficiency. Despite this, occasional errors still occur.

The Council continues to participate in the DWP's Housing Benefit Award Accuracy (HBAA) initiative, supporting national efforts to reduce fraud and error.

# (Snapshot) Long Term Empty Properties



## Direction of Travel

Against last Quarter 

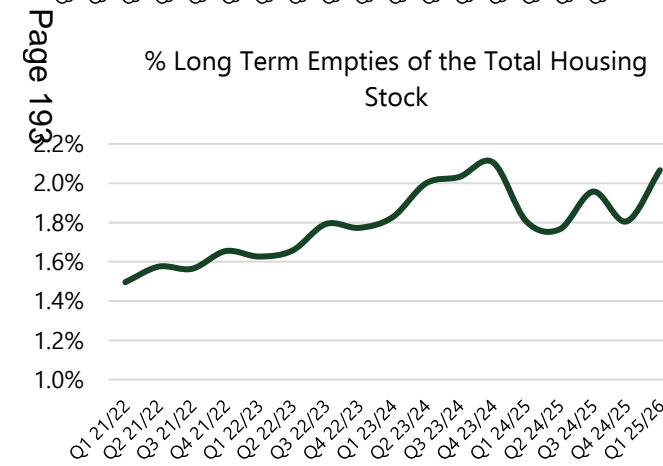
Against last Year 

Increased since last quarter and last year

## Lower is Good

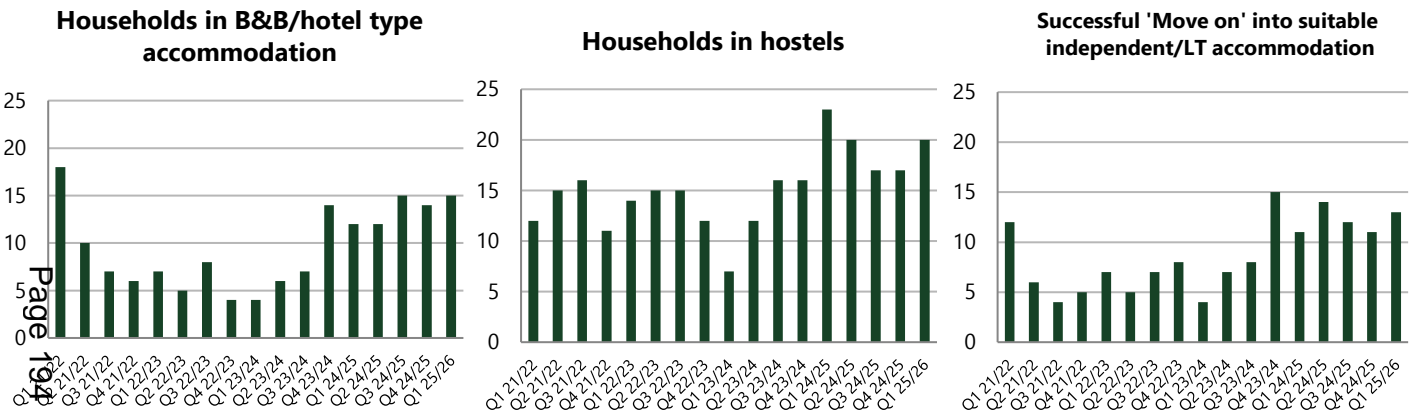
No Target

928



In Q1, the Council recorded 928 long-term empty properties (vacant for six months or more), reflecting an increase due to improved reporting systems. These enhancements have enabled more accurate identification and tracking of empty homes, providing a clearer picture of long-term vacancy and supporting more targeted interventions going forward.

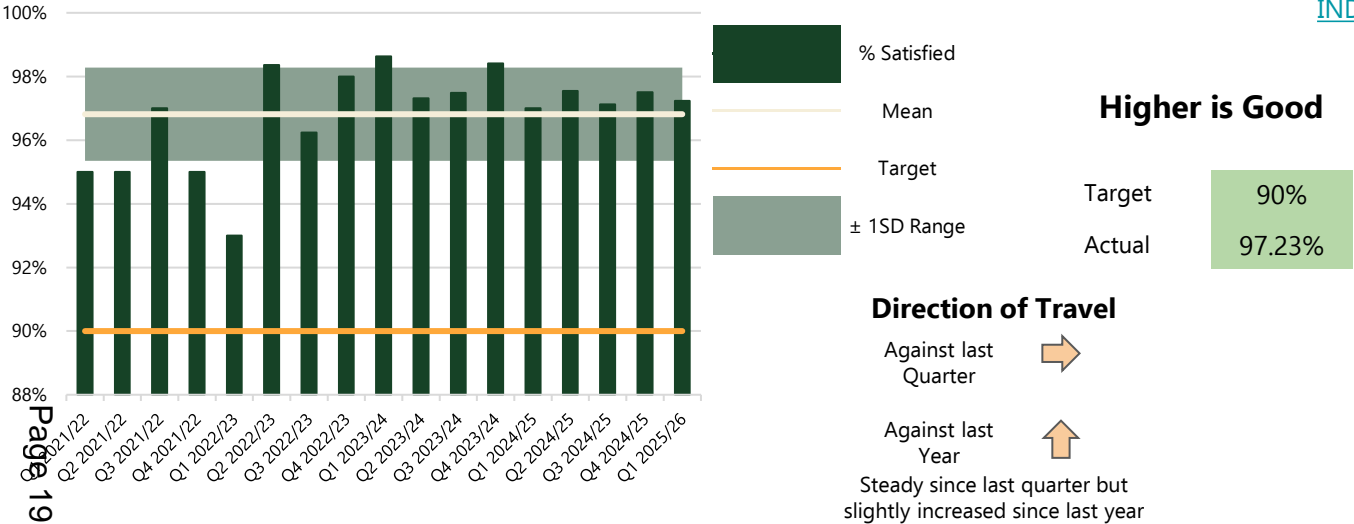
(Snapshot) Number of households in B&B/hotel-type accommodation & Hostels (LA owned or managed); and Number of successful 'Move On' into suitable independent/long-term accommodation from B&Bs/hotels/hostels



Direction of Travel		
Against Last Quarter	B&Bs/Hotels	⬆️
Against Last Year	B&Bs/Hotels	⬆️
Against Last Quarter	Hostels	⬆️
Against Last Year	Hostels	⬇️
Against Last Quarter	Move Ons	⬆️
Against Last Year	Move Ons	⬆️

Homelessness remains a key focus for the Council, where the number of individuals presenting as homeless continues to rise. However, the number in temporary accommodation has remained stable, reflecting the effectiveness of the council’s prevention approach. Rough sleeping levels in the district remain low, with zero to very few cases reported.

# Customer Satisfaction - Telephone



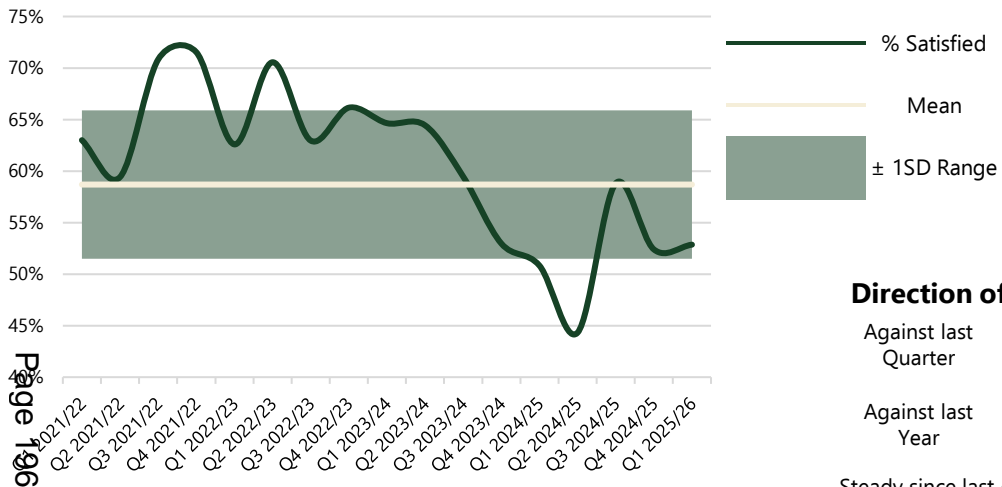
**How do we compare?**  
The Govmetric Channel Satisfaction Index is a monthly publication of the top performing councils across the core customer access channels. At least 100 customers need to be transferred to the survey to be included in the league table so even if satisfaction is high, it may not be included i.e. Forest in the below table for April.

	April Rank	April Net Sat.	May Rank	May Net Sat.	June Rank	June Net Sat.
Cotswold	2	94%	2	99%	5	90%
Forest	N/A	N/A	1	100%	1	98%
West	1	96%	3	96%	2	97%

Telephone satisfaction remained consistently high throughout Q1, supported by efforts to encourage survey participation and gather valuable feedback.

A total of 469 residents participated in the survey, of these, 456 customers reported being satisfied with the service, reflecting a high level of overall satisfaction.

# Customer Satisfaction - Email





Higher is Good

No Target

52.86%

### Direction of Travel

Against last Quarter 

Against last Year 

Steady since last quarter but increased since last year

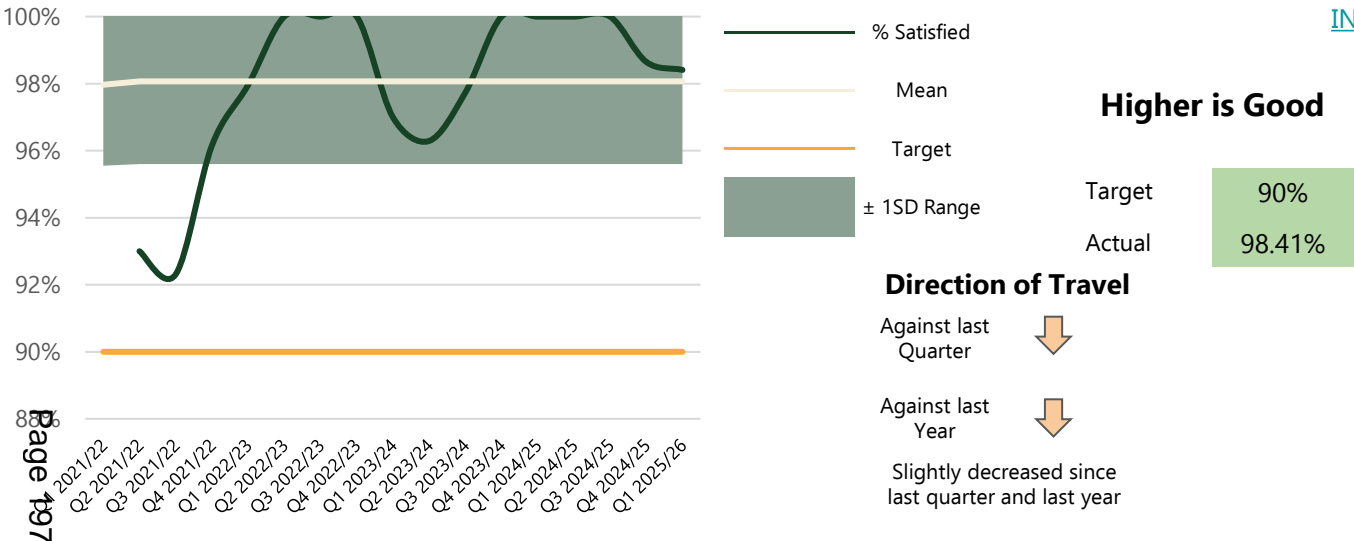
A total of 507 residents participated in the email satisfaction survey, with 268 respondents indicating they were satisfied with the service received. As part of efforts to strengthen customer insight, all customer service emails issued through Salesforce include a built-in survey link, enabling residents to provide feedback quickly and easily.

Following a previous rise in negative feedback, a review was undertaken to identify the underlying causes of dissatisfaction. The analysis highlighted recurring issues such as missed bin collections, delays in container deliveries. The customer service team continues to monitor feedback closely and proactively seeks opportunities to enhance the overall customer experience.

**How do we compare?**  
No benchmarking currently available. The Data & Performance Team will investigate options

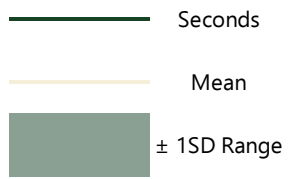
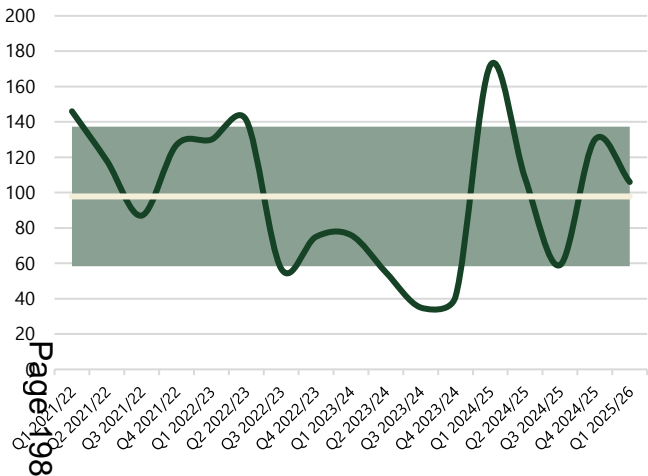


# Customer Satisfaction - Face to Face



Customer satisfaction with face-to-face interactions remains consistently strong. This continued performance underlines the value of maintaining accessible in-person services as a key part of delivering a positive and inclusive customer experience.

# Customer Call Handling - Average Waiting Time



**Lower is Good**

*No Target*  
106 Seconds

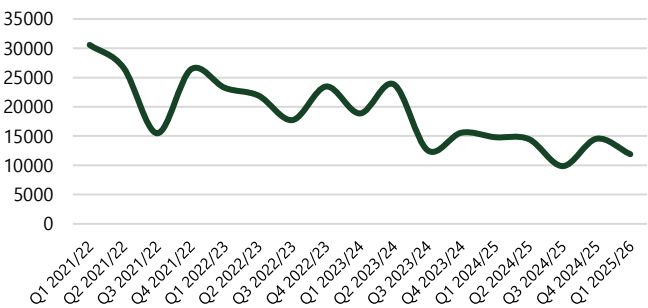
## Direction of Travel

Against last Quarter

Against last Year

Decreased since last quarter and last year

Call Volume Over Time



## How do we compare?

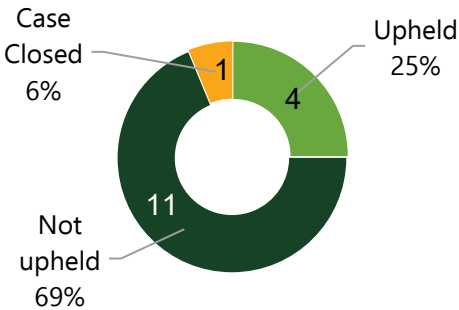
SPARSE are investigating pulling together Customer Services benchmarking data and if there is sufficient demand and suitably similar metrics to provide comparison across similarly rural local authorities we will work with them to assess any crossover in metrics and potential presentation.

In Q1, average call waiting times in Cotswold improved by around one minute compared to the same period last year. A temporary spike in April—driven by enquiries about the new Second Homes Premium—led to a 7% year-on-year increase in Revenues-related calls, but overall performance remained steady.

Call volumes continued to decline, with 11,894 calls received (down 2,906 year-on-year), reflecting the success of the Channel Choice strategy in promoting digital self-service. The service also successfully delivered £250,000 in savings for Cotswold and West by April, without compromising service quality, despite the added pressure of onboarding and training new staff during peak periods.


# Number of complaints upheld


## Complaints by Status



### Direction of Travel

Complaints upheld or partly upheld at Stage 1

Against last Quarter 

Against last Year 

Decreased since last quarter but steady since last year

**How do we compare?**  
The table outlines the complaints received by the Ombudsman over the period, the decisions made on these cases, and the Council's compliance with any recommendations issued by the Ombudsman during this time. Complaints received by the Ombudsman reflect cases where customers, having completed the Council's complaint process (see to the right), feel that the Council has not satisfactorily resolved the matter.

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 April 2025.

The new process has the following stages:

- Stage 1: A review of the complaint will be undertaken by an Operational Manager within the Service Area to which the complaint relates. A response needs to provide within 10 working days from the date that we advised that the complaint was valid.
- Stage 2: Requests for Stage 2 will be acknowledged and logged within five working days of the escalation request being received. Upon receipt of a Stage 2 request, an investigation into the complaint will be undertaken by the Complaint Officer or a member of the Complaints Team. A response will be provided to the customer within 20 working days from receipt of the request to escalate the complaint to Stage 2. Stage 2 is the organisation's final response; the complainant can then refer their complaint to the LGO.

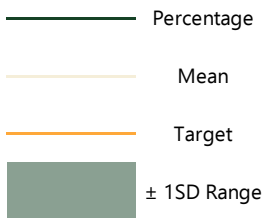
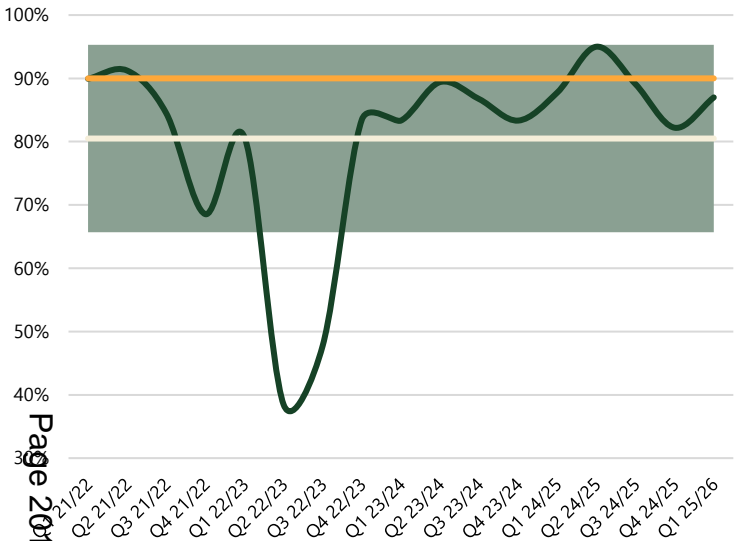
2024-25

	Complaints Investigated	Percentage Upheld	Upheld decisions per 100,000 residents	Percentage Compliance with Recommendations	Percentage Satisfactory Remedy	CIPFA Rank	Quartile
Cotswold	1	0%	0	N/A	N/A	1/13	Top
Stroud	1	100%	0.8	100%	0%	4/13	Second
Chichester	2	100%	1.6	100%	0%	9/13	Third
South Hams	2	100%	2.2	100%	50%	13/13	Bottom

# Complaints Upheld or Partially Upheld Breakdown

Service area	Description	Outcome/learning	Decision	Response time (days)
Revenues and Benefits	No second home premium letter received	Apology issued; it was explained that the council acted in line with central government guidance.	Upheld	1
Revenues and Benefits	Received multiple council tax bills with differing amounts owed	Apology issued for the discrepancy; it was explained that this resulted from Council Tax Support calculations.	Upheld	1
Waste	Green waste collection continually missed	Added to list to ensure collections are completed and an apology has been issued.	Upheld	9
Waste	Green waste bin replacement not received within 28 days	It was recognised that a confirmation email should have been sent along with the revised bill, and an apology was offered for this oversight	Upheld	4

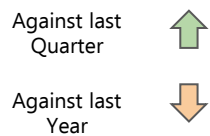
# Percentage of FOI requests answered within 20 days



**Higher is Good**

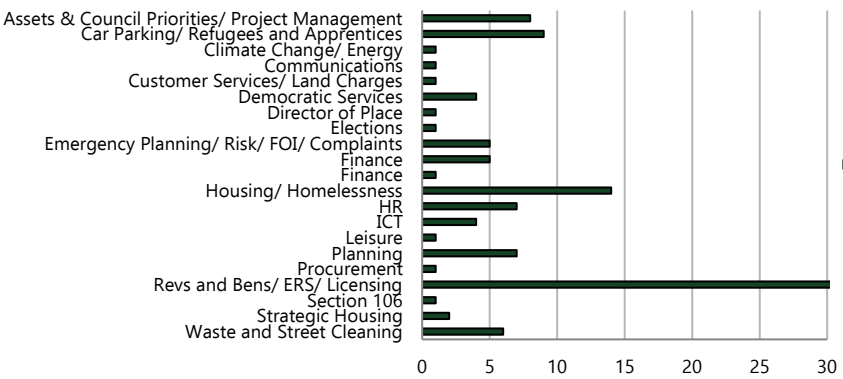
Target	90%
Actual	86.99%

## Direction of Travel

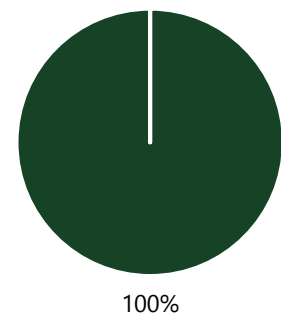


Increased since last quarter but slightly declined since last year

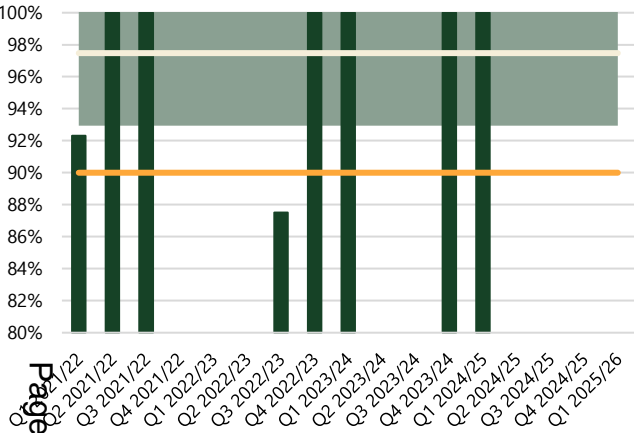
## Reasons for Delays in Responding to FOI Requests Beyond the 20-Day Deadline



Service Area not provided Information in time



# Building Control Satisfaction



**Higher is Good**

Target 90%

Actual No Data

## Direction of Travel

Against last Quarter N/A

Against last Year N/A

No Data

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The team has used various methods to engage customers for satisfaction surveys, including paper forms, electronic forms, and phone calls. However, the response rate remains low, with no surveys returned in Q1. To address this, the team has collaborated with the Data Team to create a webform that will be emailed to customers with their completion certificate, aiming to improve the response rate.

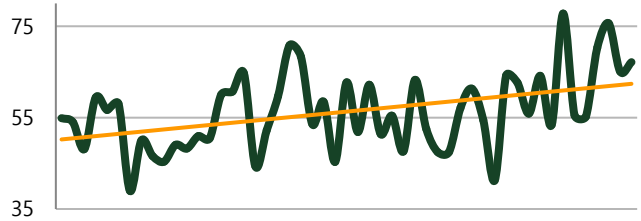
In Q1, the market share averaged 69%, with 140 applications processed, reflecting a 12% increase in market share compared to the same period last year. However, application volumes remained steady, with only a slight year-on-year increase of 9.

## How do we compare?

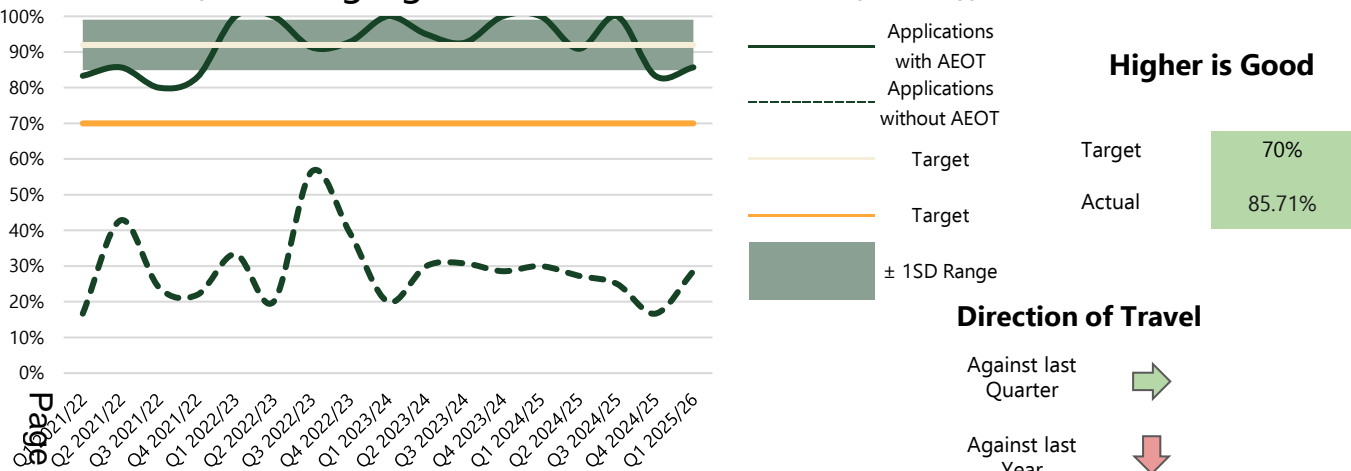
Percentage of share in the market

April	May	June	Number of Apps for Quarter
76%	65%	67%	140

## The below chart shows market share over time from April 2021



# Percentage of major planning applications determined within agreed timescales (including Agreed Extensions of Time (AEOT))



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## How do we compare?

Major Developments - % within 13 weeks or agreed time – LG Inform. Latest dataset is January - March '25 (Q4 2024-25)

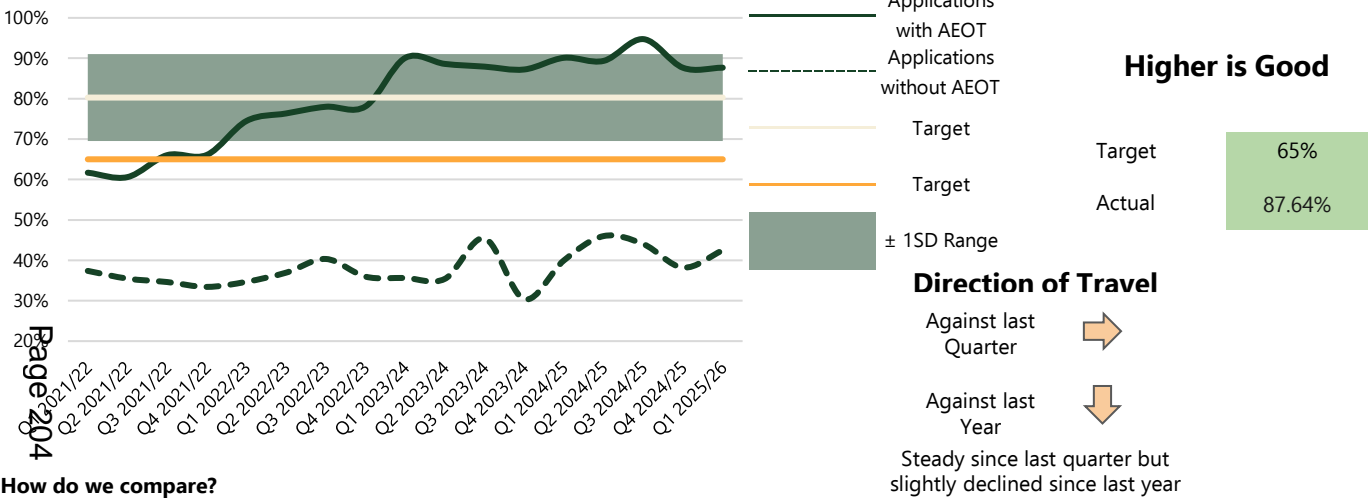
Q4 24-25 Benchmark	%	CIPFA Rank	Quartile
Malvern Hills	100	1/16	Top
Babergh	100	1/16	Top
Stratford-on-Avon	93	8/16	Second
<b>Cotswold</b>	<b>83</b>	<b>12/16</b>	<b>Third</b>
Stroud	80	14/16	Bottom
Wychavon	75	16/16	Bottom

The service has maintained strong performance in processing Major applications within the agreed timeframes.

During Q1, seven major applications were determined.

[See slide for Minor Developments for further narrative](#)

# Percentage of minor planning applications determined within agreed timescales (including AEOT)



## How do we compare?

Minor Developments - % within 8 weeks or agreed time – LG Inform. Latest dataset is January - March '25 (Q4 2024-25)

Q4 24-25 Benchmark	%	CIPFA Rank	Quartile
Mid Devon	98	1/16	Top
Wychavon	95	3/16	Top
South Hams	91	6/16	Second
<b>Cotswold</b>	<b>88</b>	<b>10/16</b>	<b>Third</b>
Derbyshire Dales	78	13/16	Bottom
East Hampshire	64	16/16	Bottom

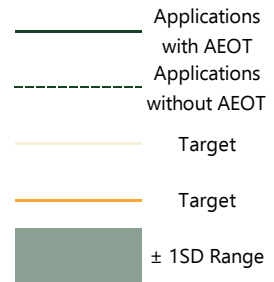
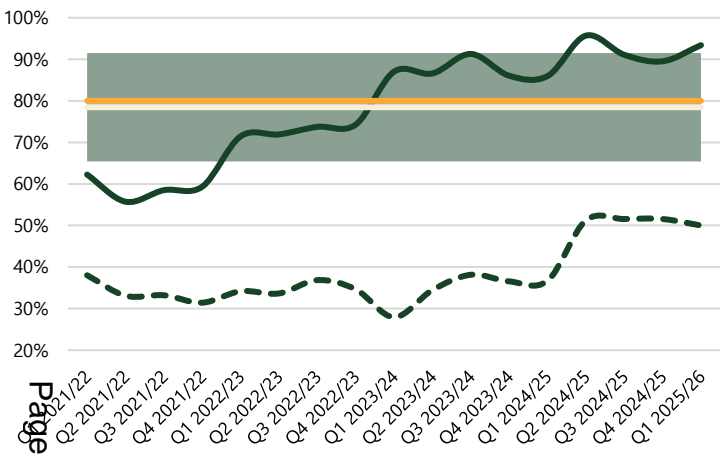
This quarter, the Council continues to perform well in processing minor planning applications within statutory timeframes. The team is currently reviewing the Planning Advisory Service (PAS) report and progressing with its action plan to improve service delivery and tackle long-standing challenges.

As of Q1, the Council's rolling average stands at 89.08%, well above the government's 70% threshold, highlighting the service's robust performance.

In total, 73 minor applications were determined during Q1.



# Percentage of other planning applications determined within agreed timescales (including AEOT)



**Higher is Good**

Target	80%
Actual	93.41%

## Direction of Travel

Against last Quarter

Against last Year

Improved since last quarter and last year

## How do we compare?

Other Developments - % within 8 weeks or agreed time – LG Inform. Latest dataset is January - March '25 (Q4 2024-25)

Q4 24-25 Benchmark	%	CIPFA Rank	Quartile
West Oxfordshire	98	1/16	Top
Stroud	95	4/16	Top
Lichfield	93	8/16	Second
Malvern Hills	90	11/16	Third
<b>Cotswold</b>	<b>87</b>	<b>13/16</b>	<b>Bottom</b>
Derbyshire Dales	81	16/16	Bottom

The Council has performed very well processing Other applications within agreed times.

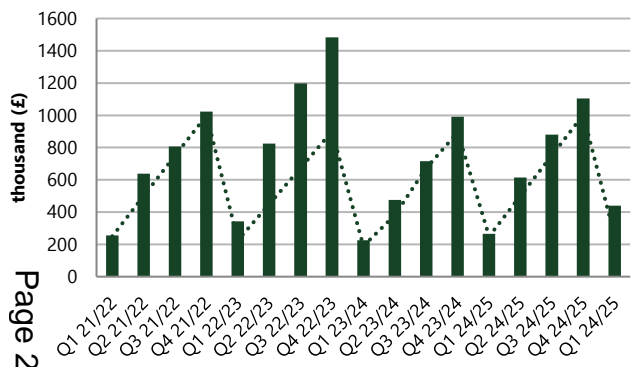
Notably, the proportion of applications determined without an agreed extension of time has consistently remained at around 50%, marking a 14% increase from the previous year. This highlights the effectiveness of the improvements implemented under the Development Management Improvement Plan.

In Q1, a total of 259 Other applications were determined

[See slide for Minor Developments for additional narrative](#)


# Total Income achieved in Planning & Income from Pre-application advice


**Total planning income**




## Direction of Travel


Total Planning Income

Against last Quarter 

Against last Year 

Pre-Application Income

Against last Quarter 

Against last Year 

Total Income - Increased since last quarter and last year

Pre-App Income - increased since last quarter and last year

## Higher is Good

Total Planning Income (£)

Target 254,124

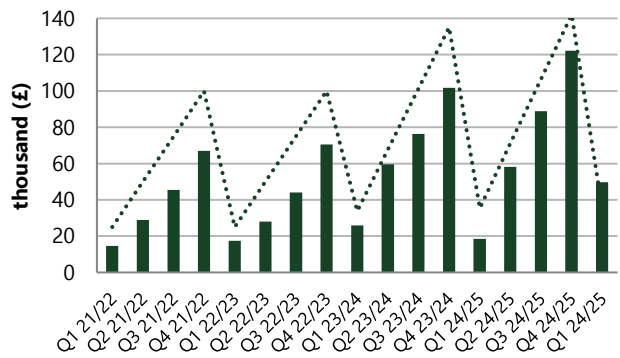
Actual 433,286

Pre-Application Income (£)

Target 35,500

Actual 49,648

**Pre-application income**

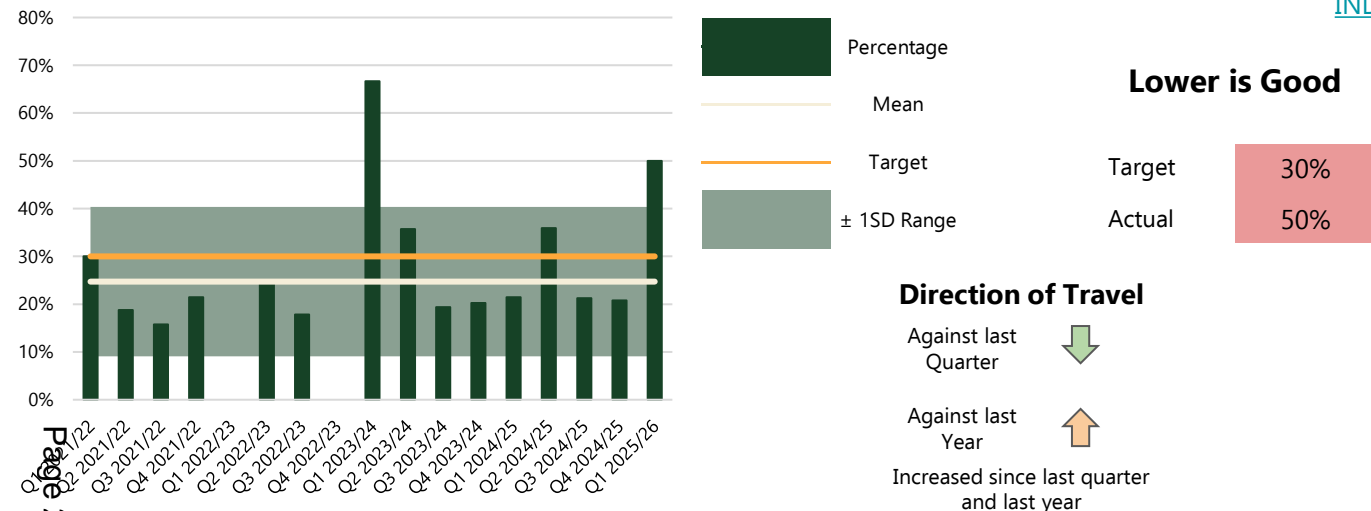


## How do we compare?

Planning Advisory Service (PAS) planned to benchmark back in 2021. No data is available in the public domain.

The Council had a strong start to Q1 2024/25 in planning income, likely driven by an increase in speculative major applications following recent national policy changes. Around 40% of income this quarter came from major applications, highlighting their significant contribution. Pre-application income also exceeded expectations, reflecting sustained developer interest. This suggests continued confidence in the area's development potential.

# Percentage of Planning Appeals Allowed (cumulative)



## How do we compare?

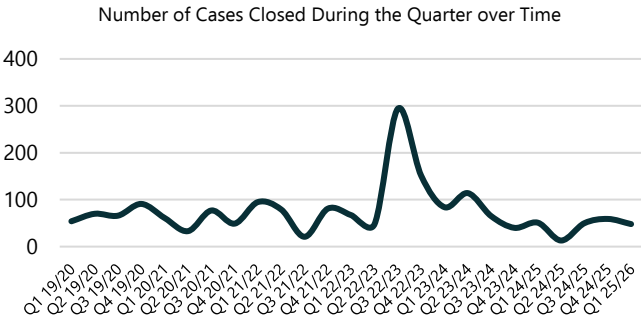
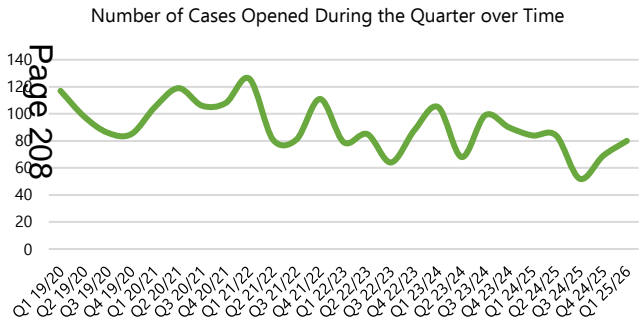
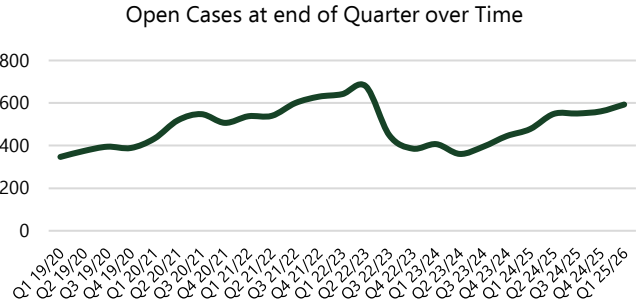
Percentage of planning appeals allowed – LG Inform. Latest dataset is January - March '25 (Q4 2024-25)

Q4 24-25 Benchmark	%	CIPFA Rank	Quartile
Tewkesbury	0	1/16	Top
<b>Cotswold</b>	<b>25</b>	<b>3/16</b>	<b>Top</b>
Chichester	29	8/16	Second
Malvern Hills	38	10/16	Third
South Hams	45	13/16	Bottom
Wychavon	74	12/12	Bottom



This indicator aims to ensure that no more than 30% of planning appeals are allowed in favor of the applicant, with a lower percentage being more favorable. According to the latest statistics from the Planning Inspectorate, the national average for Section 78 planning appeals granted is 28% (source: [gov.uk](https://gov.uk)).

Between 1 April and 30 June 2025, seven appeals were decided, with three allowed in favour of the applicant and one resulted in a split decision, resulting in a 50% allowance rate for the quarter.

# (Snapshot) Planning Enforcement Cases



## Direction of Travel for Open Cases at end of Quarter

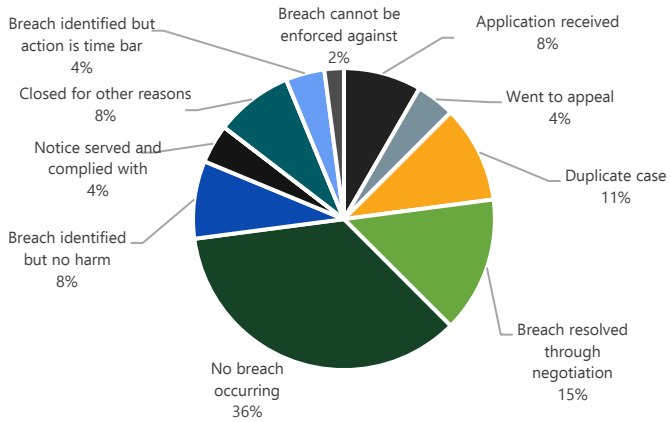
- Against last Quarter 
- Against last Year 

## Lower is Good

No Target

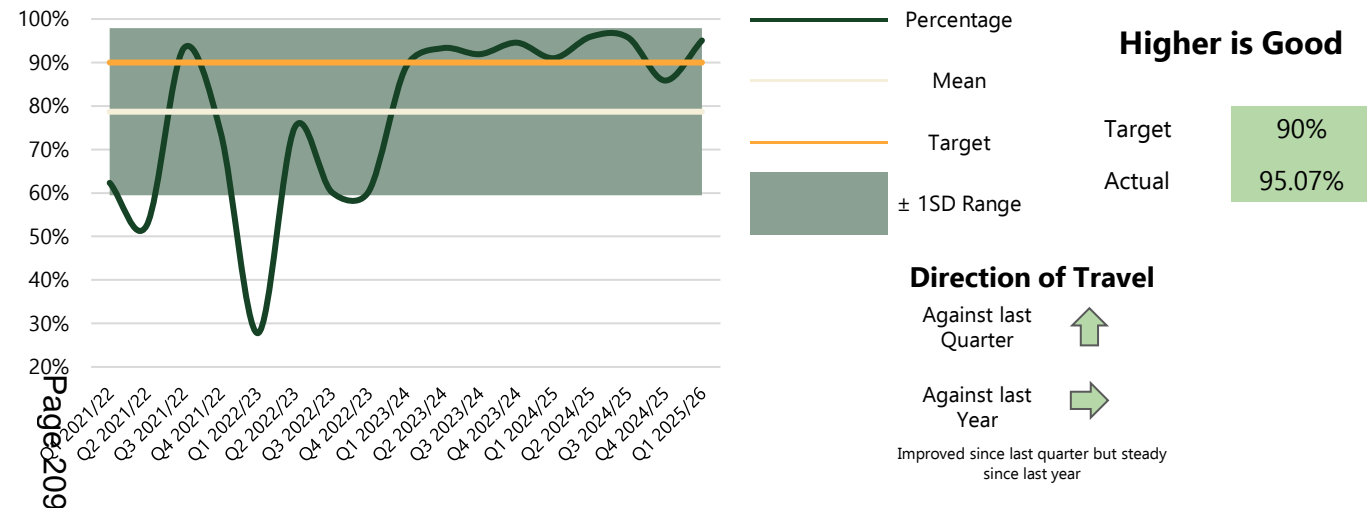
Open Cases at End of Quarter 593

## Reasons for Closure



The enforcement team has faced extended staff shortages, leading to a backlog of cases. However, with staffing levels now approaching full capacity, the team is actively addressing the backlog. Efforts are also underway to update and review the enforcement plan to enhance both service efficiency and effectiveness moving forward.

# Percentage of official land charge searches completed within 10 days



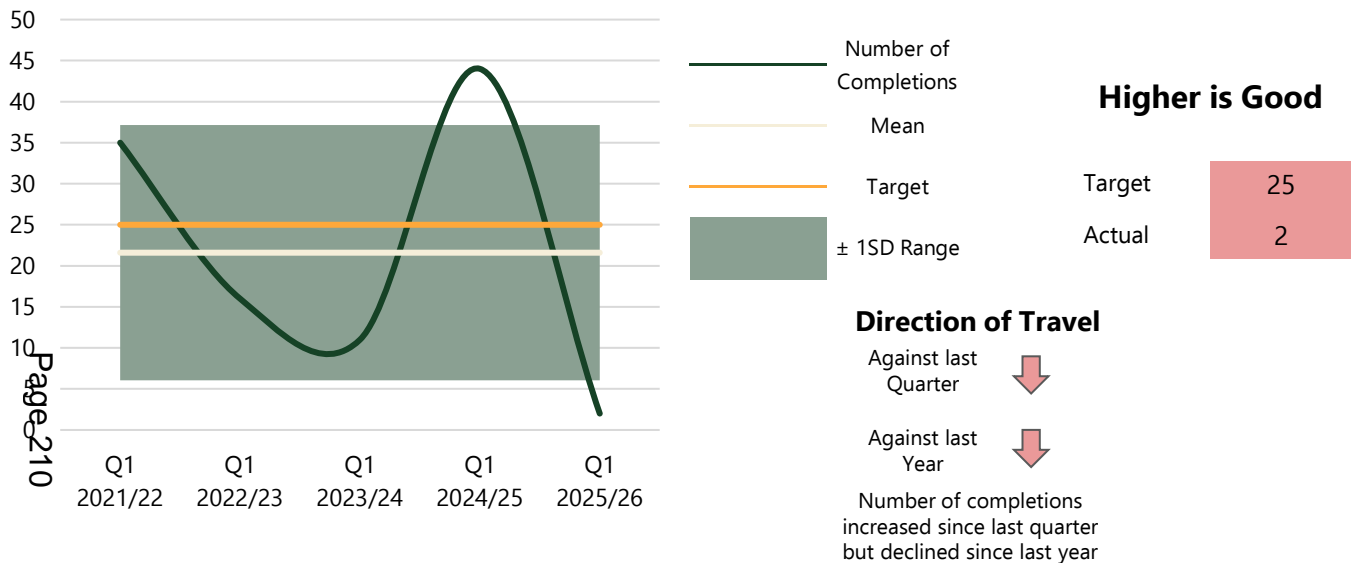
In Q1 2024/25, Cotswold District Council completed 95.07% of official Land Charges searches within the 10-day target, reflecting sustained progress in service delivery.

During the quarter, a temporary issue with the Gloucestershire County Councils (GCC) mapping system posed a potential risk to search completion rates. However, through close collaboration with GCC, a workaround was successfully implemented. As a result, the impact on overall performance was minimal and services were able to maintain momentum despite the disruption.

## How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

# Number of affordable homes delivered (cumulative)

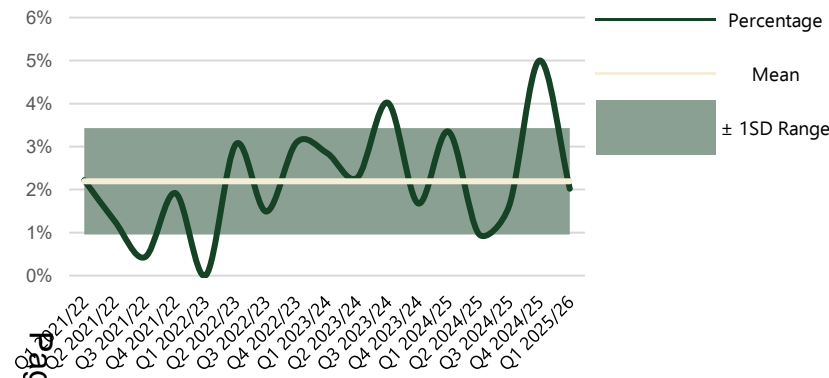


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In Cotswold, just two affordable homes were delivered in Q1, marking a slow start to the year. Registered Providers are currently projecting only 64 completions for 2025/26—well below the annual target of 100—making it unlikely the district will meet its goal. Affordable housing delivery tends to fluctuate throughout the year, as developments often take 12 months or more to complete, with some progressing in multi-year phases. The initial overdelivery of affordable homes at the start of the current strategy has also contributed to reduced delivery levels in recent years.

# 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 – Gov.uk. The latest dataset available is 2023-24

2023-24 Benchmark	Total Fly Tips	Total Enforcement Actions	Total FPNs	% FPNs per Fly Tip	CIPFA Nearest Neighbours Rank	Quartile
Maldon	364	392	13	3.57	1/16	Top
<b>Cotswold</b>	<b>972</b>	<b>58</b>	<b>12</b>	<b>1.23</b>	<b>6/16</b>	<b>Second</b>
Wychavon	835	192	3	0.36	10/12	Third
West Devon	346	0	0	0	16/16	Bottom

## Direction of Travel

### Number of Fly Tips

Against last Quarter

Against last Year

↓

↓

*No Target*

Number of Fly Tips Collected

139

Percentage Enforcement Action

Against last Quarter

Against last Year

↓

↓

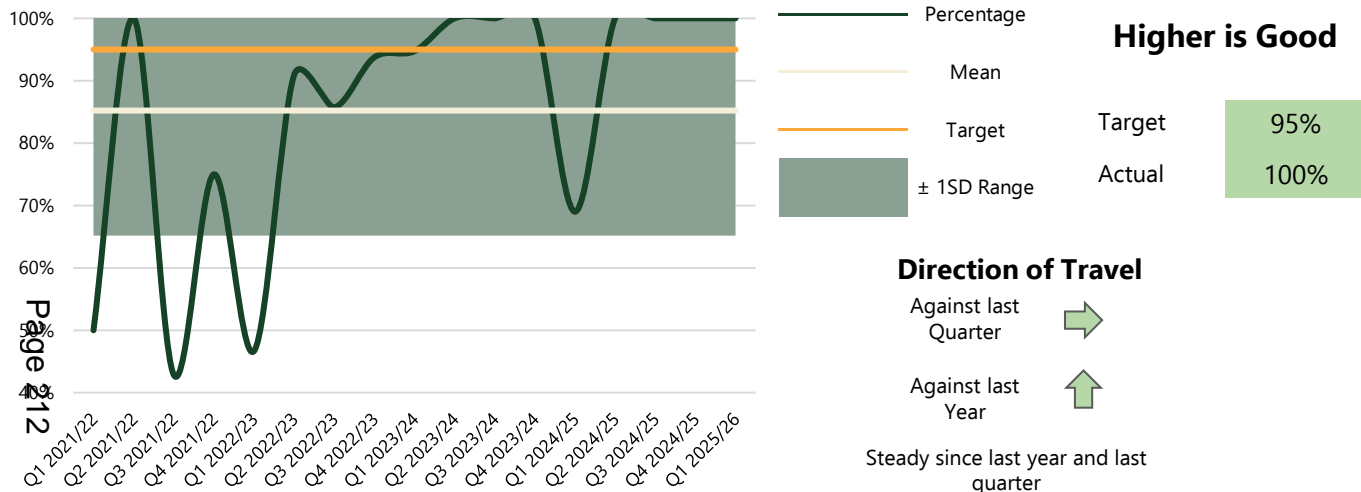
Percentage Enforcement Action

2.02%

Fly Tips – Declined since last quarter and last year  
 Enforcement Action – Declined since last quarter and last year

In Cotswold, a series of Stop & Search operations across Aston Down, Bourton-on-the-Water, and Stow-on-the-Wold led to over 170 vehicle checks. Multiple enforcement actions were taken, including letters for missing waste carrier licences and Fixed Penalty Notices (FPNs) for littering and duty of care breaches. These operations, delivered in partnership with Gloucestershire Police, Trading Standards, HMRC, and others, reflect a strong multi-agency approach. Surveillance in Sapperton and widespread deterrent signage have also contributed to reducing incidents in known hotspots.

# Percentage of high risk food premises inspected within target timescales



The Council conducted seven inspections during Q1, all of which were completed within the timescale.

High-risk food inspections are prioritised due to their greater potential impact on public health and safety enabling issues to be addressed swiftly. However, this focus can occasionally delay scheduled inspections for lower-risk food businesses. To mitigate this, the service uses a dashboard to track both high- and lower-risk inspections, ensuring that, despite the emphasis on high-risk establishments, lower-risk inspections are still completed promptly to maintain overall compliance and safety standards.

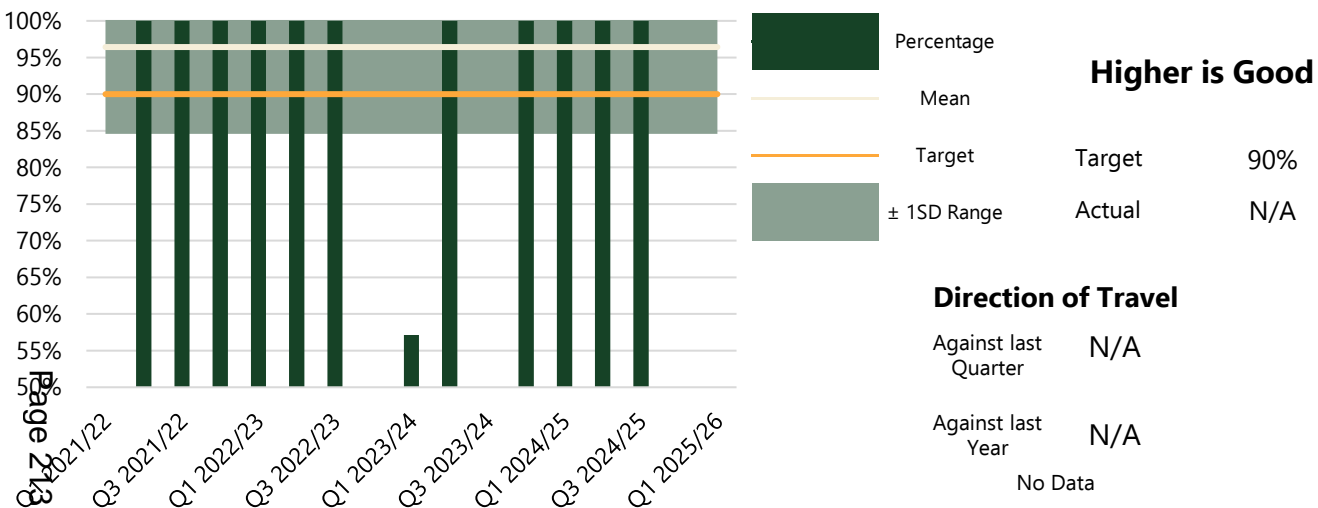
## How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options



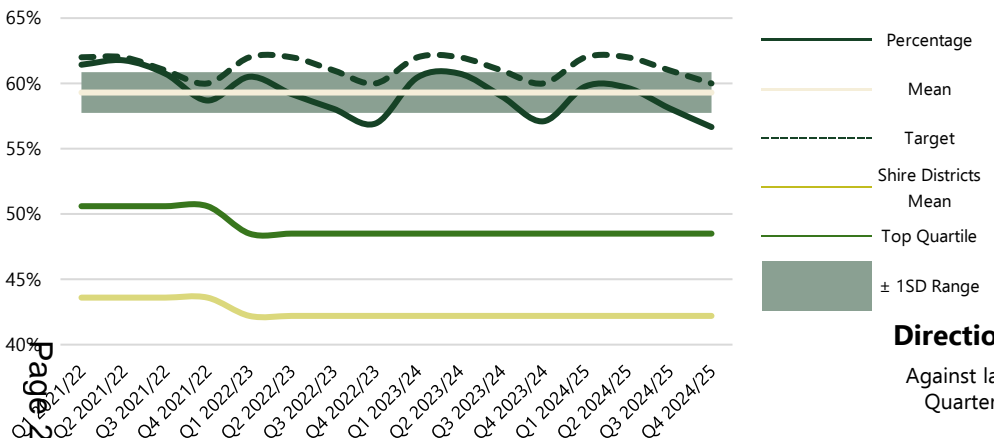
# % High risk notifications risk assessed within 1 working day

(including food poisoning outbreaks, anti-social behaviour, contaminated private water supplies, workplace fatalities or multiple serious injuries)



No high-risk notifications were received during Q1.

# Percentage of household waste recycled



**Higher is Good**

Target	60%
Actual	56.66%

## Direction of Travel

Against last Quarter  
↓

Against last Year  
↓

Declined since last quarter and last year

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### How do we compare?

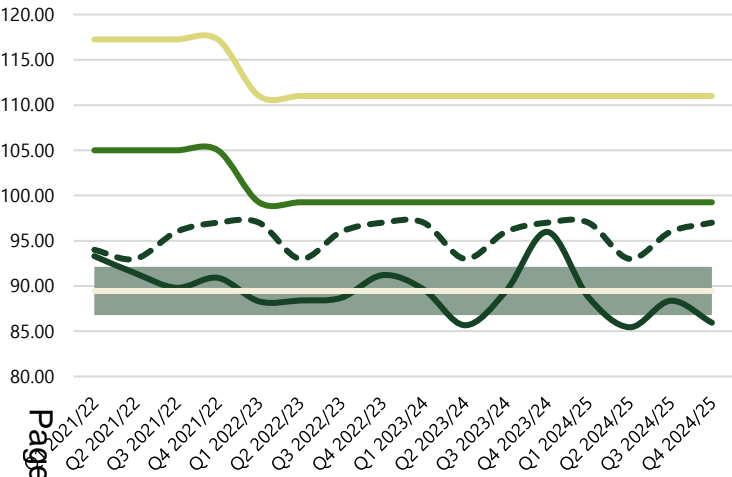
Percentage of household waste sent for reuse, recycling or composting – Gov.uk. The latest dataset available in 2023-2024

2023-24 Benchmark	%	CIPFA Rank	Quartile
Stratford-on-Avon	61	1/16	Top
Maldon	57.2	3/12	Top
<b>Cotswold</b>	<b>57.1</b>	<b>5/16</b>	<b>Second</b>
South Hams	46.6	10/16	Third
Lichfield	45.1	13/16	Bottom
East Hampshire	34.5	16/16	Bottom

The recycling rates for 2024–25 stand at 56.66%, which is approximately 0.4% lower than the same period last year. Within the quarter, rates dipped slightly in February to 47.98% after starting at 50.88% in January, but recovered strongly to 55.49% in March.

In 2023/24, household recycling rates across England varied widely, ranging from 15.8% to 62.9% among local authorities. The national average recycling rate rose slightly to 42.3%, marking a 0.6 percentage point increase from the previous year. <sup>34</sup>


# Residual Household Waste per Household (kg)




**Lower is Good**

Q4 Target	97
Q4 Actual	85.94
2024-25 Target	383
2024-25 Actual	348.48

## Direction of Travel

Against last Quarter 

Against last Year 

Decreased since last quarter and last year

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## How do we compare?

Residual household waste per household (kg/household) – Gov.uk. The latest dataset available in 2023-2024

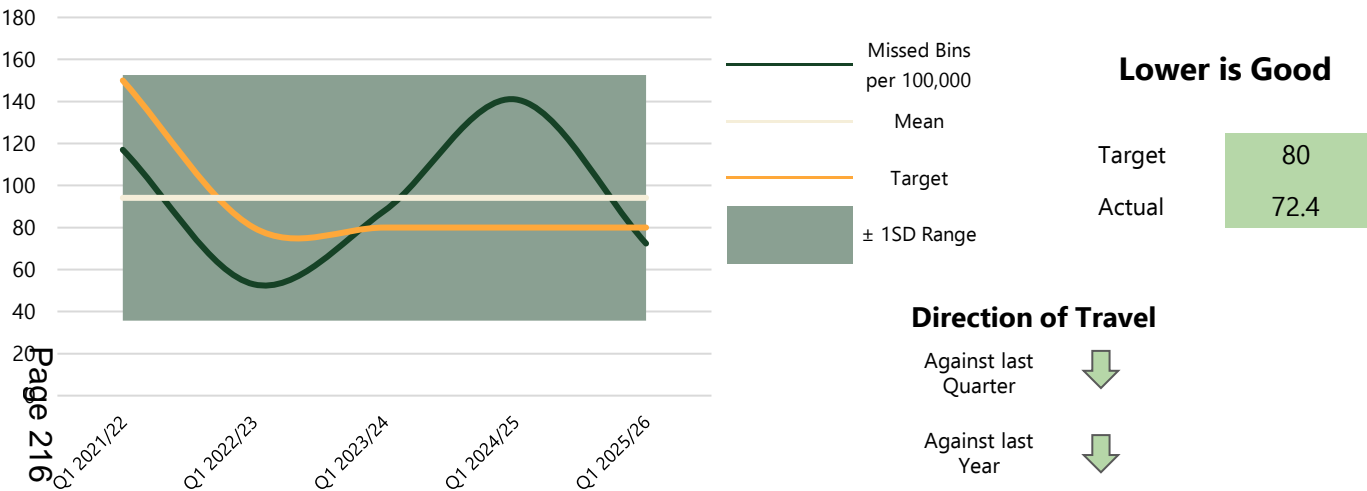
2023-24 Benchmark	Kg	CIPFA Rank	Quartile
Stroud	298.6	1/16	Top
Stratford-on-Avon	320.0	4/16	Top
Maldon	350.2	8/16	Second
<b>Cotswold</b>	<b>358.0</b>	<b>9/16</b>	<b>Third</b>
Wychavon	436.5	13/16	Bottom
Babergh	461.4	16/16	Bottom

Residual waste follows a cyclical pattern throughout the year, with targets set accordingly.

Residual waste per household decreased steadily over the quarter, from 31.92 kg in January to 27.50 kg in February, and 26.52 kg in March. January typically sees higher levels due to post-Christmas waste, so the downward trend that followed is in line with seasonal expectations.

Despite this seasonal fluctuation, the Council remains well within the first quartile of all English authorities, maintaining a comfortable margin of approximately 14kg.

# Missed bins per 100,000



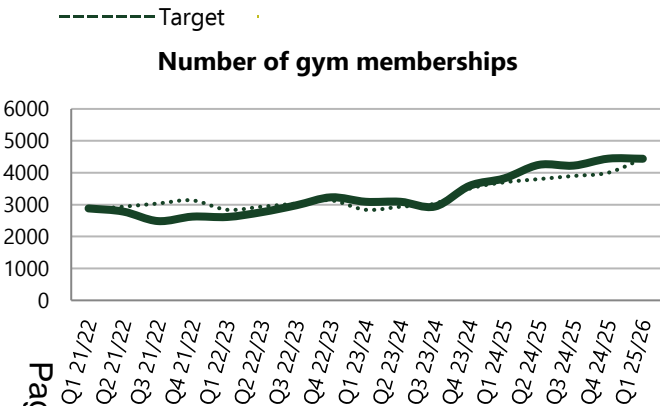
How do we compare?

Missed collections per 100,000 collections (full year) - APSE

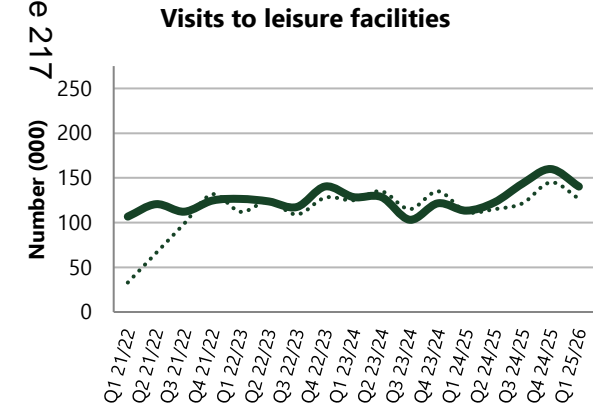
2022-23 Benchmark	Missed collections per 100,000 collections	Family Group Rank	Family Group Quartile	Whole Service Rank	Whole Service Quartile
Cotswold	109.89	12/14	Bottom	39/45	Bottom

In Q1, the Council recorded a missed bin rate of 72.4 per 100,000 collections, now below the target of 80. This reflects ongoing efforts to improve service reliability. Work is underway to reassign around 700 properties to new collection rounds—these are locations that have experienced repeated missed collections following the main service reorganisation. The rebalancing aims to enhance both efficiency and consistency across the district.

# Number of visits to the leisure centres & (Snapshot) Number of gym memberships



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## Direction of Travel

Gym Memberships

Against last Quarter



Against last Year



Leisure Visits

Against last Quarter



Against last Year



Gym Memberships – Steady since last quarter but increased since last year  
Leisure Visits – Declined since last quarter but improved since last year

## Higher is Good

Gym Memberships

Target

4,441

Actual

4,438

Leisure Visits

Target

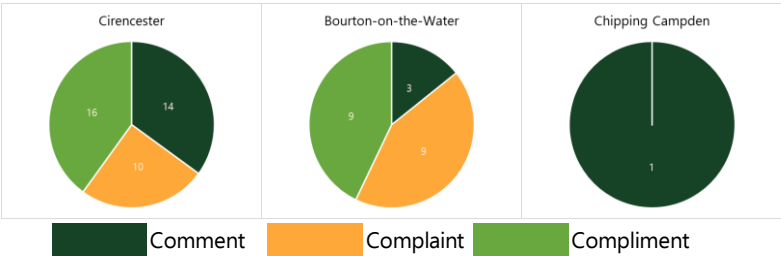
126,810

Actual

140,226

In Q1 2024/25, the Council reported 4,438 gym members, just under its target of 4,441, reflecting continued stability following several quarters of growth. Leisure centre usage remained strong, with 140,226 visits, well above the target, showing high community engagement and consistent use of local facilities.

Freedom Leisure receives and reviews all submitted comment cards for each of its leisure centres. The information below is organised by centre and indicates whether the feedback received was a comment, complaint, or compliment



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.

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Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET 4 SEPTEMBER 2025</b>
Subject	<b>PEOPLE &amp; CULTURE STRATEGY 2025 - 2028</b>
Wards affected	All
Accountable member	Cllr Mike Every, Leader of the Council Email: <a href="mailto:mike.every@cotswold.gov.uk">mike.every@cotswold.gov.uk</a>
Accountable officer	Angela Claridge, Director of Governance & Development (Monitoring Officer) Email: <a href="mailto:angela.claridge@cotswold.gov.uk">angela.claridge@cotswold.gov.uk</a>
Report author	Angela Claridge, Director of Governance & Development (Monitoring Officer) Email: <a href="mailto:angela.claridge@cotswold.gov.uk">angela.claridge@cotswold.gov.uk</a>
Summary/Purpose	To approve the People & Culture Strategy attached at Annex A and accompanying year 1 implementation plan at Annex B.
Annexes	Annex A – People & Culture Strategy Annex B – Implementation Plan Annex C – Internal Communications & Engagement Strategy
Recommendation(s)	That Cabinet resolves to: <ol style="list-style-type: none"> <li>1. Approve the People &amp; Culture Strategy as detailed in Annex A</li> <li>2. Approve the four core workforce values: <ul style="list-style-type: none"> <li>• We put our <b>communities first</b>: their priorities are our priorities</li> <li>• We are <b>one team</b>: working for our residents and businesses</li> <li>• We are <b>business focussed</b>: ensuring efficiency, effectiveness and good value for money</li> <li>• We are <b>set up for success</b>: to deliver against our corporate priorities</li> </ul> </li> </ol>



	<p>3. Approve the year 1 implementation plan as detailed in Annex B (September 2025 – August 2026)</p> <p>4. Note the Internal Communications &amp; Engagement Strategy as detailed in Annex C</p>
Corporate priorities	Delivering Good Services
Key Decision	No
Exempt	No
Consultees/ Consultation	Corporate Leadership Team, Cabinet and the workforce.





## **1. EXECUTIVE SUMMARY**

- 1.1** Cotswold District Council does not currently have a defined People and Culture Strategy. Such a strategy is helpful in setting out the vision, values, behaviours and ways by which employees are supported and developed. This is particularly important during the forthcoming period of change arising from local government reorganisation which affects individuals whose careers, roles and futures are directly affected.
- 1.2** Innovation Central was commissioned to support the Council in the development of such a strategy. This strategy, workforce values and year 1 implementation plan are now presented for approval.

## **2. BACKGROUND**

- 2.1** Prior to the Publica review and the transition of several key teams back to the Council, the direct employee base at Cotswold District Council was very small. As part of the detailed transition work and as the staffing base would become considerably larger, it was considered that the need for a Cotswold District Council specific People and Culture Strategy was very important. The need for a strategy was subsequently reinforced by the announcement of the Government's plans for local government reorganisation in Gloucestershire.
- 2.2** The development of the strategy included:
- Facilitating focus group meetings with all individuals transferring across to the Council.
  - Facilitating a workshop with senior managers to get their views and input on what a 'great day at the office' looks like.
  - Creating a set of values as an output of the information and views established through the focus group work.
  - Preparing a draft strategy.
  - Hosting an online staff engagement survey seeking feedback on the draft vision, values and year 1 priorities.
  - Considering the feedback and preparing the final strategy for adoption.

## **3. MAIN POINTS**

- 3.1** Over 100 members of staff took part in the focus groups (the sessions included Publica staff that worked closely with Cotswold District Council as well as those transitioning to the Council), with all views and comments captured.



**3.2** The emerging core workforce values and strategy, together with suggested 'year 1 priorities' was then shared with staff and their views were sought via an online staff engagement survey earlier this year. Most responders supported or strongly supported the vision, values and year 1 priorities.

**3.3** Following this period of employee engagement, the following core workforce values are recommended:

- We put our **communities first**: their priorities are our priorities
- We are **one team**: working for our residents and businesses
- We are **business focussed**: ensuring efficiency, effectiveness and good value for money
- We are **set up for success**: to deliver against our corporate priorities

The strategy includes a framework setting out the "expected" behaviours across all types of roles within the Council. These core behaviours align to the core values, define 'how' staff are expected to approach their day-to-day work and sit alongside 'what' they are expected to do as well as unacceptable behaviours. This will assist in providing clarity and focus around professional development, performance, recruitment and retention.

**3.4** The strategy, if adopted, will become one of the key documents for the Council, reflected at both an individual and team level; referenced as part of one to ones, team meetings, appraisals, recruitment, onboarding and career development, working alongside the Corporate Plan and the Council's approach to transformation.

**3.5** The strategy recognises and addresses a few challenges including the impending structural changes to local government which mean district councils are abolished. At the heart of every Council are the workforce who keep services running. There is the risk of losing some of our best performing staff just when the Council needs them most.

**3.6** The Implementation Plan (Annex B) sets out a number of projects and initiatives that have been identified to address the priorities within the strategy in the first year.

**3.7** How and when we communicate with staff, in addition to what we say and do, are fundamental to successfully embedding the values and principles of the People & Culture Strategy. Good communication is also being key to the success of the strategy. Since March 2025, we have been evolving a new internal communications and engagement strategy (Annex C) that is fully aligned with the People and Culture Strategy. It is designed to ensure we have a comprehensive toolkit of comms tools, introduced and enhanced by data, aimed



at embedding the strategy and making it relatable to staff, all while keeping them informed in different ways and ensuring there are plenty of means for two-way engagement.

- 3.8** If approved, the strategy will be launched to the workforce using a range of avenues; the staff portal, blogs, emails, corporate updates, agenda items at team meetings and via six weekly "all staff" briefings. The internal staff reference group, known as the "Culture Club" will be used as a sounding board.

#### **4. ALTERNATIVE OPTIONS**

- 4.1** Cabinet may choose not to adopt the People and Culture Strategy; however, this is not recommended for the reasons set out in the report.

#### **5. CONCLUSIONS**

- 5.1** The adoption of a People and Culture Strategy will support the Council's transition in terms of embedding its key messages, supporting employee development and managing a significant period of change.

#### **6. FINANCIAL IMPLICATIONS**

- 6.1** There are no specific financial implications arising from this report. Implementation of the Action Plan will need to be met from existing budgets and resources.

#### **7. LEGAL IMPLICATIONS**

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

#### **8. RISK ASSESSMENT**

- 8.1** The principal risk is that without a People and Culture Strategy, the Council fails to articulate clearly its vision, values and the way it will retain, support, engage, empower and develop its employees. The report sets out the risk of workforce attrition and retention arising from reorganisation which is also reflected in the Council's risk register.

#### **9. EQUALITIES IMPACT**

- 9.1** The strategy aims to enhance systems, policies and processes to ensure that all employees are recognised, supported and developed.

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



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**10.1** None directly associated with this report.

## **11. BACKGROUND PAPERS**

**11.1** None.

(END)

# People and Culture Strategy 2025 - 2028

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District Council

# What is a People Strategy?

- CDC's People Strategy is a roadmap for working together to make our district a better place to live, work and visit.
- It aims to build a high-performing, inclusive Council that values openness, service and collaboration.
- By supporting staff from everyday work to professional development, it fosters pride, belonging and dedication.
- It addresses the workforce challenges facing the sector such as local government reorganisation and hard to recruit and retain roles.
- It connects our work to CDC's mission - delivering quality services and addressing local needs like housing and climate action.
- Success relies on having the right skills, culture and structures in place.



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District Council

# CDC Values

We've developed four core workforce values, shaped by feedback, that reflect what a great day at work looks like and shapes our People and Culture Strategy.

## Our Cultural Ways of Working

We put our **communities first**: their priorities are our priorities

We are **one team**: working for our residents and businesses

We are **set up for success**: to deliver against our corporate priorities

We are **business focussed**: ensuring efficiency, effectiveness and good value for money

**We put our communities first by:**

**We care for and support each other by:**

**We take pride in our work and deliver on our promises by:**

**We aim for excellence and real impact by:**

- Acting with care, empathy and respect
- Responding to feedback and needs
- Communicating actively and with transparency
- Setting and working towards meaningful goals
- Empowering each other to make decisions that support the district

- Valuing and appreciating everyone's contributions
- Working as one team to achieve shared goals
- Promoting flexible working for wellbeing
- Celebrating individuality and inclusivity
- Recognising and appreciating achievements

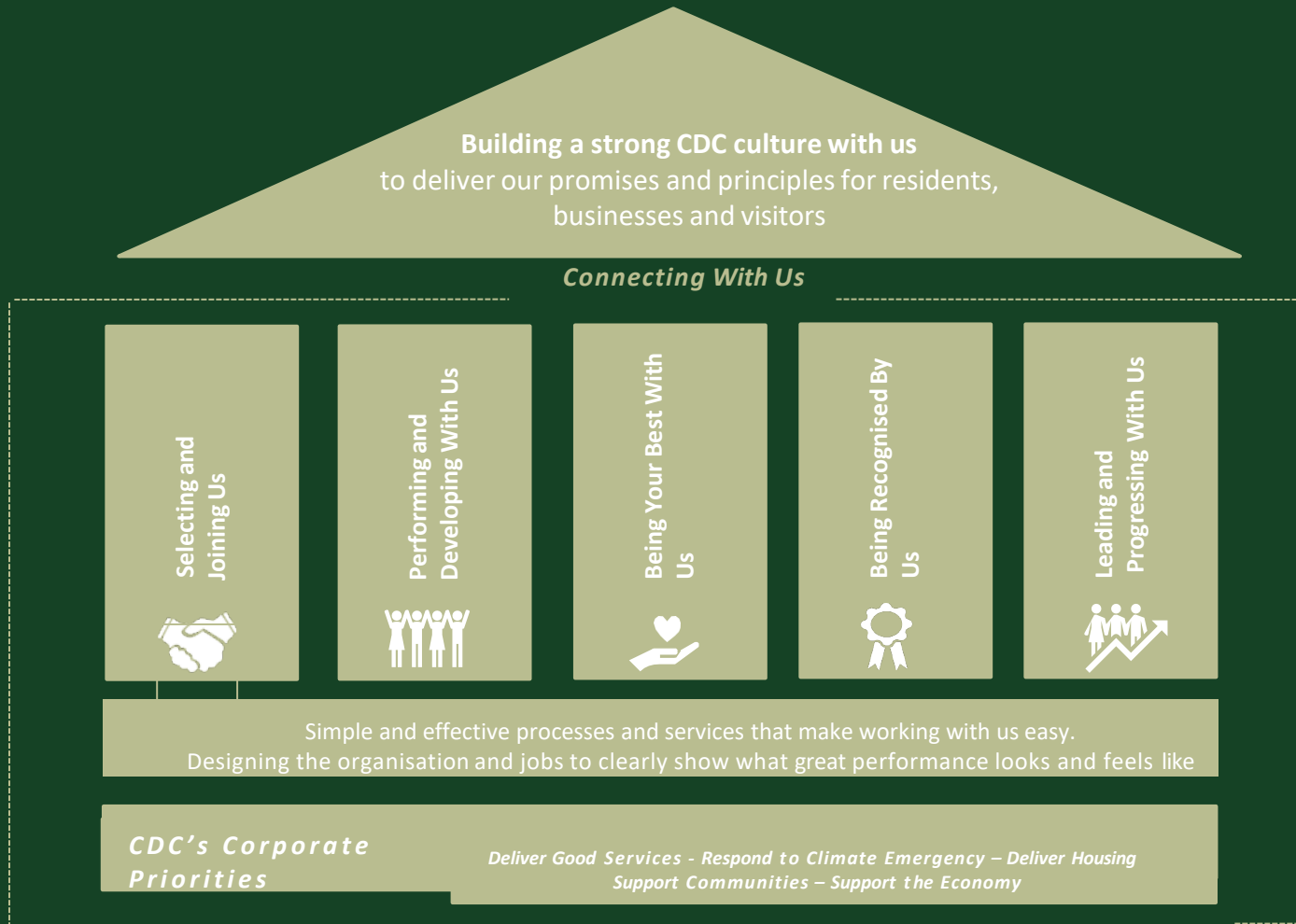
- Setting high standards and owning our responsibilities
- Bringing a positive, 'can do' attitude
- Collaborating openly with partners to serve our community
- Understanding how our roles contribute to CDC's success
- Supporting learning, growth and career development

- Challenging assumptions, being innovative and seeking better ways of working
- Collaborating and aligning with CDC's priorities
- Finding solutions and staying focused on quality results
- Managing projects well, using resources wisely and being accountable
- Seizing opportunities to improve and succeed



# Creating the CDC People Strategy

- This strategy clarifies each employees' role and shows how we all contribute to delivering on our promises as one team





# Organisation and Job Design

## **We will ...**

Organise roles to meet priorities, work efficiently and respond quickly to business need. Clear responsibilities and shared values build a strong culture and maximise use of resources.

## **How we will deliver this:**

- Develop shared values that build a supportive, efficient and community-focused culture to:
  - ✓ Make CDC a great workplace where people are proud to work
  - ✓ Help residents see CDC as committed to delivering value
- Define career pathways and support employee further development.
- Regular, timely and transparent communication.
- Staff engagement.



# Systems and Processes

## We will:

Create a great experience for staff with simple, trusted systems and processes that make it easy to get the tools and support they need to do their best.

## How we will deliver this:

- Review our systems, processes, policies and procedures to enable:
  - ✓ How we work well together at CDC to build our culture
  - ✓ Good teamwork with Publica
  - ✓ Transition/change training and support for employees
  - ✓ Encourage self-service and personal responsibility
  - ✓ Create standard materials that drive consistency



# Selecting and Joining Us

## **We will:**

Create an easy recruitment and onboarding process that shows our values. A clear, welcoming approach helps attract top talent and set new staff up for success.

## **How we will deliver this:**

- Align hiring and internal promotion based on CDC's values and skills as well as promote our brand through recruitment campaigns.
- Make new starter induction easy with clear steps, mentoring, meet-and-greets and IT setup.
- Use standard probation guidelines for all new employees.



# Performing and Developing With Us

## **We will:**

Build a culture of high performance and learning with clear goals, regular feedback and opportunities for personal development. Support staff to succeed and feel empowered.

## **How we will deliver this:**

- Create a simple performance management framework aligned to our priorities and values.
- Supporting all employees with continuous development and training.
- Develop an employee retention strategy.
- Give leaders and managers the confidence they need to have discussions with their team members linked to career development.
- Ensure all employees have the skills to embrace organisational change.
- Use apprenticeships to build skills and promote opportunities.
- Utilise workforce data and analyse trends to identify challenges and drive improvements.



# Being Your Best With Us

## We will:

Build an inclusive culture where staff can be themselves and celebrate differences. By focusing on diversity, belonging and wellbeing, we ensure everyone feels valued, supported and able to thrive and innovate.

## How we will deliver this:

- Create inclusive policies promoting mutual respect, no discrimination, flexible work and wellbeing.
- Celebrate diversity and inclusion through a calendar of cultural and awareness days.
- Promote wellbeing resources and mental health awareness.
- Help managers promote inclusion and wellbeing with visible support, team learning and clear communication.
- Encourage the formation of diverse networks like the Women's Network or LGBTQ+, to create safe spaces for connection and mutual support.



# Being Recognised By Us

## We will:

Demonstrate we are dedicated to making staff feel valued through a fair and inclusive recognition and reward programme. By celebrating their efforts in many ways, we create a culture that motivates and supports great service.

## How we will deliver this:

- Promote the full range of reward options to help employees make the most of their benefits.
- Develop a retention strategy.
- Analyse and benchmark rewards and benefits to improve attraction and retention of talent.



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District Council

# Leading and Progressing With Us

## We will:

Develop leadership practices that reflect our values and help leaders to inspire their teams.

Set up talent and succession planning to find and grow future leaders, ensuring lasting success and great service.

## How we will deliver this:

- Create a development programme based on our values to help managers and leaders:
  - ✓ Make work great for their teams
  - ✓ Promote inclusion, accountability and high performance
- Create a talent and succession planning pipeline to ensure we "grow our own" and develop future leaders.



# Connecting With Us

## We will:

Promote open communication and involve employees in decisions to build trust, boost collaboration and strengthen engagement across CDC, Publica teams and stakeholders.

## How we will deliver this:

- Create a communications and engagement strategy based on “you said, we did”, including:
  - ✓ A ‘Culture Club’ with staff from all teams to help shape key priorities
  - ✓ Leadership visibility sessions to share updates and decisions
  - ✓ Newsletters and bulletins to keep everyone informed and connected
  - ✓ Celebration events linked to the cultural calendar
  - ✓ An engaging, useful colleague portal
  - ✓ Employee engagement surveys with follow-up actions shaped by staff





# Behavioural Framework

The following pages describe the behaviours expected from employees when following our values and also identifies the behaviours that are not acceptable at CDC

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# Measuring Our Collective Success

- We will measure success in four areas: Staff, Customers, Company and Community.
- By tracking all these, we can identify challenges and opportunities.
- The example below includes some of the factors to be measured.

<b>Staff</b> <b>How engaged are our employees?</b> <b>Are we providing a rewarding place to work?</b>	<b>Customers</b> <b>How are we delivering for our residents, business and visitors?</b>
<ul style="list-style-type: none"> <li>▪ Employee engagement level measured through surveys</li> <li>▪ Employee appraisals undertaken including setting personal objectives</li> <li>▪ Number of vacancies filled by internal career moves</li> <li>▪ Sickness absence statistics</li> </ul>	<ul style="list-style-type: none"> <li>▪ Service accessibility – measuring ease of access for users</li> <li>▪ Digital transformation and innovation – how many residents are accessing services online</li> </ul>
<b>Company</b> <b>Are we managing risk effectively?</b> <b>Are we running the business efficiently and effectively?</b>	<b>Community</b> <b>What impact are our services having on the wider community?</b> <b>What social and economic impact are our services having?</b>
<ul style="list-style-type: none"> <li>▪ Attrition and retention levels</li> </ul>	<ul style="list-style-type: none"> <li>▪ Quarterly performance reporting to elected members</li> </ul>



# We put our communities first: their priorities are our priorities

**A Council that is proactive and responsive to the needs of our residents and businesses in a fast-changing environment and to build for the future while respecting our heritage**

All Staff	Leaders
<ul style="list-style-type: none"><li>• Show care, kindness and respect in everything we do</li><li>• Responding appropriately to community feedback</li><li>• Listen actively and communicate openly to build trust and collaboration</li><li>• Support each other to make decisions that match community needs and CDC's priorities</li></ul>	<ul style="list-style-type: none"><li>• Show care, respect and inclusion, keeping the community's needs central</li><li>• Listen to community feedback and consider adjusting plans to stay responsive</li><li>• Communicate honestly to build trust and teamwork</li><li>• Set clear, meaningful goals that benefit the community and unite teams</li><li>• Take responsibility for actions and fix issues if they arise</li></ul>

## **When 'we put our community first' is NOT demonstrated**

Examples of behaviours that do not show 'we put our customers first' include:

- Avoiding responsibility for your actions
- Not treating community members with respect
- Ignoring or not asking for feedback
- Poor or infrequent communication with the community
- Being impatient or dismissive with customers
- Making decisions that ignore the community's needs
- Waiting for problems to happen instead of preventing them



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# We are one team: working for our residents and businesses

## We care about our staff, supporting and respecting each other, we ...

All Staff	Leaders
<ul style="list-style-type: none"> <li>• Respect and value everyone's contributions in a supportive team</li> <li>• Work together as one team to reach CDC's priorities</li> <li>• Support flexible working for team and personal wellbeing</li> <li>• Celebrate diversity and make everyone feel included</li> <li>• Recognise and appreciate achievements at all levels</li> </ul>	<ul style="list-style-type: none"> <li>• Show appreciation for team and individual efforts, leading by example in modelling the values</li> <li>• Break down silos and encourage teamwork with clear communication</li> <li>• Support flexible working while meeting team and CDC's priorities</li> <li>• Recognise and develop talent, coaching for growth and learning from mistakes</li> <li>• Promote collaboration, clarity and learning focused on CDC's priorities</li> </ul>

## When 'we are one team' is NOT demonstrated

Examples of behaviours that do not demonstrate 'we are one team' include:

- Ignoring staff's feelings or opinions
- Making changes without considering others
- Not helping or caring, saying "it's not my job"
- Allowing disrespect or discrimination
- Not saying "thank you"
- Blaming others for mistakes
- Bringing problems without offering solutions



# We are set up for success: to deliver against our corporate priorities

**We take pride in our work and hold ourselves accountable to deliver on our promises, we ...**

## **All Staff**

- Keep high standards and help each other take responsibility
- Be proud of your work and stay positive
- Work closely with partners, break down barriers and communicate openly
- Learn about the Council and how we all contribute to CDC's success
- Support learning, skill growth and career development

## **Leaders**

- Share a clear vision so everyone knows their role and goals
- Encourage personal responsibility for actions and teamwork
- Make brave decisions that balance risk and benefit for the greater good
- Handle performance or behaviour issues kindly and help people improve
- Be friendly and ready to support when needed

## **When 'we are set up for success' is NOT demonstrated**

Examples of behaviours that do not demonstrate 'we are set up for success' include:

Working alone without involving partner organisations

Criticising others publicly or gossiping

Favouring certain teams or people unfairly

Ignoring council priorities and focusing only on personal aims

Defending yourself without seeing the bigger CDC picture

Resisting new ways of working



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District Council

# We are business focussed: ensuring efficiency, effectiveness and good value for money

## To work hard and achieve great results we ...

All Staff	Leaders
<ul style="list-style-type: none"> <li>• Question assumptions and suggest new ideas to improve</li> <li>• Work together, sharing different views and focusing on CDC's priorities</li> <li>• Solve problems and keep pushing for great results</li> <li>• Plan and manage projects well, saving resources and thinking about costs</li> <li>• Recognise and use new opportunities to improve and succeed</li> </ul>	<ul style="list-style-type: none"> <li>• Encourage teams to challenge ideas and keep improving</li> <li>• Inspire others to grow and be their best</li> <li>• Clearly explain CDC's priorities and how work fits, removing obstacles</li> <li>• Engage staff and stakeholders, recognising opportunities for growth</li> <li>• Make decisions that save costs without considering the impact on the district's services</li> </ul>

## When 'we are business focussed' is NOT demonstrated

Examples of behaviours that do not demonstrate 'we are business-focused' include:

- Reject new ideas, saying "we've always done it this way"
- Avoid responsibility and don't own mistakes
- Lack of concern about the quality of work
- Manage time badly and miss deadlines
- Make decisions without thinking about stakeholders or budget
- Accept "good enough" instead of aiming for excellence
- Resist change and uncertainty





## Annex B

### Draft People & Culture Strategy Implementation Plan – Year 1 Implementation Plan (September 2025 – August 2026)

Legend – project status

	In progress
	Not started

Legend – owners

AC	Angela Claridge – Director of Governance
CJ	Charley Jarrett – Head of Talent & Development
CLT	Corporate Leadership Team
Comms	Communications Team
CR	Charlotte Rivers (Publica HR)
CS	Cheryl Sloan – Business Manager (Business Continuity, Governance & Risk) Publica
CT	Carmel Togher – HR Business Partner
DS	David Stanley -Deputy CEO & S151 Officer
EMT	CDC Extended Management Team (Directors & Heads of Service)
FW	Frank Wilson – interim Managing Director (Publica)
IC	Innovation Central Ltd (external Learning & Development Company)
JL	John Llewellyn – Business Manager (HR) Publica
JP	Jane Portman – Interim CEO
KB	Keren Bass – Interim Head of Finance (Publica)
MA	Matt Abbott – Head of Communications
Publica HR	HR Team (Publica)

## Component - Organisation and Job Design

Ref	Aim	Action	Owners	Resource Required	Timescale	Priority	Outcome (what success looks like)	Target
1	Workforce Values - to shape and embed a great culture at CDC	a) Approve draft values: <ul style="list-style-type: none"> <li>We put our <b>communities first</b>: their priorities are our priorities</li> <li>We are <b>one team</b>: working for our residents and businesses</li> <li>We are <b>business focussed</b>: ensuring efficiency, effectiveness and good value for money</li> <li>We are <b>set up for success</b>: to deliver against our corporate priorities</li> </ul>	AC/CT	No additional resources required	Cabinet approval 4.9.25	High	Consistent evidence of more positive than negative behaviours being demonstrated at work. Empowerment is the default people management approach (trust your staff and yourselves)	
1	Workforce Values - to shape and embed a great culture at CDC	b) Design, embed & implement "what good looks like, modelling behaviours" for workforce and to 'call out' behaviour that does not align with the values.	AC/CT/MA	Yes – Culture Club to contribute	Nov 2025	Med	As above	
1	Workforce Values - to shape and embed a great culture at CDC	c) CEO blogs to reinforce values. c) Include in regular 1:1s. Build values into team meetings and appraisals.	JP/EMT/Comms	No	Ongoing	Med	As above	



Ref	Aim	Action	Owners	Resource Required	Timescale	Priority	Outcome (what success looks like)	Target
4	Ensure people policies and procedures are fit for purpose.	<p>a) Refresh policies to support change arising from local government reorganisation, legal compliance and business need including: Agency Workers, Carers, Pay &amp; Grading Principles, Pension Fund Discretions, Performance Improvement (Capability), Dogs at Work and others as legislation or business reasons dictate.</p> <p>b) Undertake equality impact assessments as part</p>	<p>CT/AC</p> <p>CT</p>	<p>None</p> <p>Incorporate Culture Club to test/consult on policies (in addition to unions) prior to completion.</p> <p>None</p>	<p>Ongoing to Mar 2026</p> <p>As above</p>	<p>Med</p> <p>High</p>	<p>Policies providing guidance, ensuring legal compliance, and fostering a positive organisational culture.</p>	<p>Agreed policies.</p>

		of review/development of new policies/procedures						
4	Ensure people policies and procedures are fit for purpose.	c) Publish and implement an agile working toolkit to support those manage the performance of agile/hybrid workers or in flexible team structures.	AC	None	Sep 2025	High	Management guidance, ensuring legal compliance, and fostering a positive organisational culture.	

### Component - Selecting and Joining Us

Ref	Aim	Action	Owners	Resource Required	Timescale	Priority	Outcome (what success looks like)	Target
5	Prioritise a seamless and engaging onboarding journey for <b>new</b> colleagues so they feel valued	a) Develop a refreshed onboarding process. b) Reinforce importance of service specific local induction and probationary periods amongst managers.	CJ  Hiring Managers	No	Dec 2025	Med	New appointees are "business ready" in terms of knowledge, skills and behaviours within recognised probationary period	
6	Consider introducing a mentorship or buddy system to support new employees	Launch Mentoring Programme	CJ	Mentors/ buddies/role models to be identified (within CDC)	Phase 1- Dec 2025	Med	All new employees supported during induction.	

### Component - Performing and Developing with Us

Ref	Strategy Aim	Action	Owners	Resource Required	Timescale	Priority	Outcome (what success looks like)	Target
7	Ensure our performance	a) Ensure everyone will have at least one	Line managers	No	Dec 2025	High	Strong culture of performance	Increased rates of

	management framework supports all employees' professional development	opportunity each year to discuss their performance, objectives and ongoing professional development					management embedded across the organisation where good performance is recognised and celebrated, and poor performance is dealt with effectively	appraisal completion
7	Ensure our performance management framework supports all employees' professional development	b) Develop managers and equip them with the skills to have developmental conversations with their team during 1:1s and appraisals.	CJ	No	Dec 2025	Med	As above	As above
7	Ensure our performance management framework supports all employees' professional development	c) Ensure everyone has 1:1s with their line manager at least monthly to discuss performance, objectives and ongoing professional development	Line managers	No	Aug 2025	High	As above	
7	Ensure our performance management framework supports all employees' professional development	d) Deliver a 'fit for purpose' Workforce Development Programme which responds to skills and capacity shortages	CJ	No	Aug 2026	Med	Tailored workforce development plan meeting the needs of the business, is affordable and delivers sustained improvements in performance and behaviours	

### Component - Being your Best with Us

Ref	Aim	Action	Owners	Resource Required	Timescale	Priority	Outcome (what success looks like)	Target
7	Encourage the formation of diverse networks like the Women's Network or LGBTQ+ to create safe spaces for connection and mutual support where we can foster a sense of belonging	Refresh Equality, Diversity & Inclusion Policy	JL/CT/AC	No	Jan 2026	Med	Improved diversity of workforce and address any bias staff and candidates have confidence in our processes	Cabinet approval

### Component - Being Recognised by Us

Ref	Aim	Action	Owners	Resource Required	Timescale	Priority	Outcome (what success looks like)	Target
8	Promote the full range of current reward options to help colleagues maximise their benefits and feel valued	a) Promote existing employee benefits & EAP via staff webinar & portal feature.	CR (Publica HR)	Culture Club input into benefits that incentivise them	Webinar Sep 2025	Med	Reward and recognition activities will be embedded as part of organisational life.	Improved staff morale measured through staff survey
8	Promote the full range of current reward options to help colleagues	b) Undertake pay levelling, pay & grading assessment based upon market intelligence	CS	No additional resource	Nov 2025	Med	Staff recognition & retention.	

	maximise their benefits and feel valued.	including comparative pay, availability of key disciplines, national shortages and employee feedback.						
8	Promote the full range of current reward options to help colleagues maximise their benefits and feel valued	c) Develop a retention strategy.	CT/AC	No additional resource	Dec 2025	High	Staff recognition & retention.	Exit interview, turnover data.
9	Develop a recognition plan informed by colleague feedback and aligned with business goals	a. CDC staff recognition & "shout-outs" on the portal. b. Promote Quarterly Partnership Recognition Awards.	Publica HR Comms/EMT/	No additional resource required	Ongoing	Med	Staff feel recognised when their work is acknowledged	Improved staff morale measured through staff survey

### Component - Leading and Progressing with Us

Ref	Aim	Action	Owners	Resource Required	Timescale	Priority	Outcome (what success looks like)	Target
10	Promote a Leadership Pathways Programme for managers.	a) Actively encourage participation in existing programmes (LGA/Solace).	CJ	No	Aug 2026	Med	Staff will see visible evidence of inclusive leadership by the behaviours and messages of our senior staff strong culture of performance	Staff survey results demonstrate staff feel change is managed effectively and feel

							management embedded across the organisation where good performance is recognised and celebrated, and poor performance is dealt with effectively	involved in decisions which impact on them
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### Component - Connecting with us

Ref	Aim	Action	Owners	Resource Required	Timescale	Priority	Outcome (what success looks like)	Target
11	Delivery of a targeted communication and engagement strategy to keep everyone connected and informed	Strategy will undergo revision & updates as required.	MA	No	Ongoing	High	Staff survey results demonstrate staff feel change is managed effectively and feel involved in decisions which impact on them	Six weekly staff briefings. Improved staff communications measured through staff survey
12	Ensure colleague feedback is not just gathered but also acted upon to build trust and drive meaningful change	Deliver employee engagement "pulse" surveys to collect detailed feedback around the staff experience and communication.	MA	No	Autumn 2025	Med	Create a continuous loop of information that drives improvement for the current /future workforce	

# Internal communications & engagement

Cotswold District Council

**First produced in April 2025, updated in August 2025**



**COTSWOLD**  
District Council

# Background

In 2024, the transition of staff from Publica meant that Cotswold District Council (CDC) significantly increased its directly employed headcount. Through 2025, more services and more staff will be repatriated from Publica to the council, increasing headcount further.

Following the transition, a People & Culture Strategy has been developed, setting out how colleagues at CDC can work together – along with colleagues at Publica, and Gloucestershire's other councils – to achieve the vision of making our community a better place to live, work, and visit. It aims to build a high-performing, inclusive council that values openness, customer focus and collaboration.

The transition and the employment and cultural responsibilities it places on the council comes at a time when more change is on the horizon, in both the short and medium term.

Local government reorganisation, as set out in the government's Devolution Whitepaper, is likely to spell the end of the two-tier local authority system in Gloucestershire – with local councils combining to form either one or two unitary authorities. For staff, this presents opportunity but is also a source of anxiety and concern.

Ongoing pressures to local government finance also require new, innovative ways of working; a transformative approach to service delivery which requires an engaged, inspired workforce.

These elements require a robust and comprehensive internal communications strategy that inspires, informs and educates council staff – all while fostering a culture of pride, belonging and dedication.



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# Key inputs

- People & Culture Strategy
- Corporate Plan
- Business manager input
- Key milestones / events / dates
- Internal comms channel data



# Analysis & developing a baseline

*This analysis covers pre-April 2025, the period prior to launching  
this strategy*

# Channels & internal comms tools (as of March 2025)

## Cotswold District Council

### The Portal

An intranet for posting news and updates and hosting key employee / departmental information

### Briefings

CEO briefings for all staff

## Publica

### The Portal

### Manager newsletters

**Softer events (Publica Picnics, Christmas Quiz)**

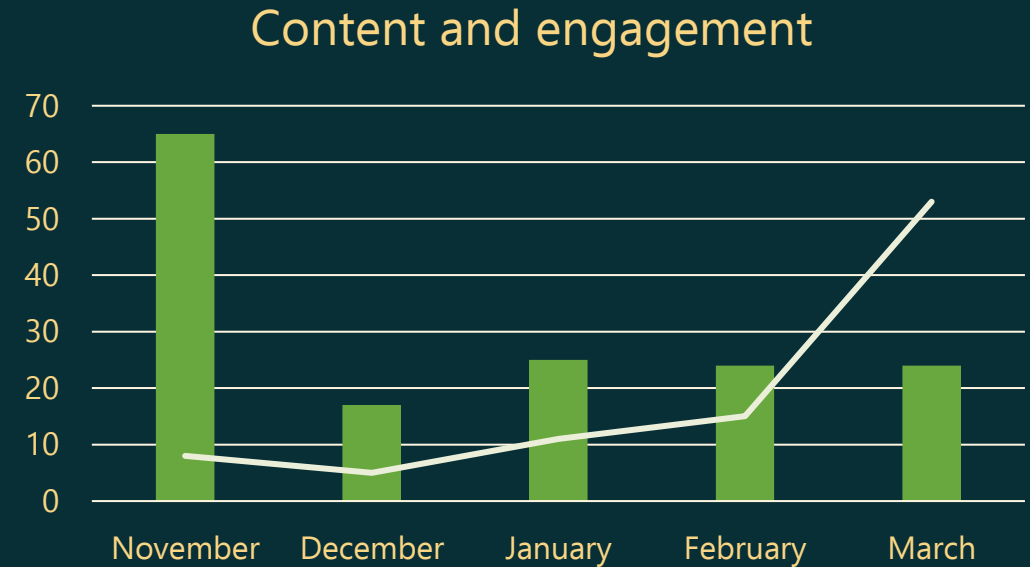
### Briefings

**Keeping You Connected newsletter**



# The Portal – a snapshot

## Engagement and visitors increasing



**5,188** Portal page views in **March**,  
**5,499** in **February**,  
**5,800** in **January**

The number of people visiting/accessing the portal each month has been trending upwards since launch – but this appears to be plateauing

**Regular content, engagement trending upwards**

■ Pieces of content — Engagement



## Most-viewed posts/news articles

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Unsurprisingly, important updates (like LGR and Publica transition) have achieved the most views. This demonstrates an appetite for ongoing updates on these topics

News item	Views
Devo whitepaper	396
Leader standing down	354
LGR briefing (Feb)	307
Spotlight on Daisy	259
Phase 2 Publica transition	230
Culture Club Making A Difference	170
Red Nose Day – Wear Red	136

People/human interest related stories are also popular. The Daisy post was evidently a little different (other SoY stories haven't done so well). Using people to engage people is key to success.



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# Posts with most engagement

Engagement on The Portal is gradually increasing, but it is particularly high on people-related or human-interest posts. We can infer from this that where engagement is sought on internal communications content, positioning stories with people or causes at the heart is important. This is important when building culture. March is the first time that engagement has been in double-figures.

News item	Likes	Comments	Total
Spotlight on Daisy	3	4	7
Can we get to £400 RND	3	4	7
RND Wear it Red and cake sale	4	2	6
RND We did it!	1	4	5
Culture Club	4	0	4
William’s parachute jump challenge	3	0	3



# Least viewed posts/articles

News item	Views
iHASCO updated	9
How to check your State pension forecast	7
Spaces still available on First Aid course	7
Trinity Road office closed Saturday	7
Member briefing on the economy	5
Farming to Reverse Climate & Ecology Crisis	2
We can Move district funding	3

These posts have had very few views. It could be because they weren't also shared by email. It could also be topic type, and therefore interest/perceived relevance.

This isn't to say that we shouldn't include these sorts of updates. Rather, it could be that they can be positioned differently. It also creates a contrast between those updates that are most-viewed – which are people-centric and perceived relevant.



# The Portal content gaps...

## Department news

There is currently nothing on The Portal that shares updates about what different departments are working on, successes etc.

## New starters

With lots of new people joining the business, new starters – or info on new starters – isn't currently shared.

## Alignment on Corporate Plan

The Portal offers an opportunity to share content that reinforces and clearly articulates/highlights progress against the Council's corporate plan

## A manager zone

There isn't currently an area for managers only – a view can/should be taken as to whether that is necessary.

## Greater promotion needed

In some cases, vlogs and other stories are being shared, but these aren't promoted. So unless staff go looking for new stories, they won't find them





# CEO Briefings

Since October 2024, there have been six leadership-led all-staff briefings/events:

**October**  
Meet & greet  
(RW)

**November**  
Meet & greet  
(RW)

**February (3)**  
LGR briefing  
(RW)

**February (14)**  
All-employee  
(FW)

**April**  
Meet The Chief  
(RW)

**July**  
All-staff briefing  
(JP)

These have been well-attended, with good questions and engagement.



## Meet the Chief: pilot

On Tuesday 1 April, CDC ran its first Meet the Chief session. The feedback is split by those who attended and those who didn't. This is to understand what might have increased participation.

74%

didn't attend because they had calendar clashes/invites weren't issued with enough notice

33%

would have attended had invites been issued with more notice

An extra 4 people would have attended were the event hybrid/virtual

Meet 'the leadership'/senior team might have been better

24 respondents

54% didn't attend

46% did attend

43%

left the session feeling 'informed'

Overall rating of 4.27 out of 5

82%

said there was nothing they disliked about the sessions

There was very even split on what people liked the most, including a forum to ask Rob questions, hearing more about the People & Culture Strategy and being able to submit questions in advance

Only 58%

said they would attend the next one

Fewer shout outs, more focus on a small number of individuals

More speakers from different departments

Shorter presentation



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## Other work in progress...

### Development of People & Culture Strategy

This has encompassed two-way engagement, through focus-groups and consultation surveys

### Initial meetings of CDC Colleague Culture Club

This is a team of volunteers, brainstorming ideas on how to develop culture. There have been three meetings so far.



# Takeaways

## Portal doing heavy-lifting

The Portal is currently the central internal comms tool – hosting content and sharing information. It is a good resource, which is constantly improving. Visits, views and engagement is on the up. This contradicts anecdotal feedback we've had that 'no one looks at The Portal'... they do, but only when it's interesting or relevant. So an IC strategy needs to be interesting and relevant...

## Portal data points to human-interest

Though limited, it can be inferred that the team is responding positively to human-interest/people stories. This isn't dissimilar to the sort of content that scores best on social media. It's clear, too, that updates on important/high impact programmes (like Publica transition and LGR) are in demand.

## Meet the Chief

'Meet the Chief' – a Culture Club suggestion – served a good purpose during the Publica transition, but its purpose can be covered through other comms initiatives.

## There's big potential for briefings

The work of the Culture Club, high engagement of people/human interest stories on The Portal, and the demand for leadership-led information mean there's an opportunity to do more with briefings.

## There's lots more to try...

There isn't a huge amount of baseline data to draw from. But that affords opportunity for the strategy to adopt new approaches, on which feedback can be requested later. But we can look at what's working well on The Portal, and broaden that out.

## Gaps to plug and new areas to cover

This is covered on page 10. But an IC strategy has the potential to cover more areas and bring in more 'channels'.



# Taking internal communications forward



# Our communications & engagement strategy: Principles & objectives

In line with the People & Culture Strategy – and in particular the **Connecting With Us** year-one priority – the internal communications & engagement strategy will foster a **culture of transparency** and **open dialogue**, to **enhance trust** and **encourage collaboration**.

The programme of work will **inform, educate** and **inspire** staff around key issues, **champion success** and **facilitate recognition**.



# Our communications & engagement strategy: Adopting P&CS ways of working & values

Our internal communications and engagement strategy must be underpinned by the central facets of the People & Culture Strategy, which will guide our approach, tactics and plans.

## One team

- Valuing and respecting each other
- Working as one team and breaking down silos
- Celebrating each other, feeling valued and creating a sense of belonging
- Recognising achievements

## Set up for success

- Upholding high standards and taking accountability
- Taking pride & a 'can do' approach
- Working collaboratively
- Developing a wider understanding of what we all do
- Encouraging growth

## Community first

- Care, empathy and respect.
- Responsive to feedback, with pace, agility & adaptability
- Listening and communicating
- Setting goals
- Empowering each other to make decisions that align with community needs and CDC objectives

## Business focussed

- Challenge assumptions and innovate
- Work collectively and combining diverse perspectives to align around objectives
- Deliver high quality solutions
- Plan & manage projects effectively
- Capitalise on new opportunities



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# Our communications & engagement strategy:

## Core principles

These core principles have been developed to ensure this strategy meets the communication needs of the council and its employees now, while ensuring that plans and output adhere to and promote the P&CS behaviours at every point.

### Regularity

This means ensuring there is a constant flow of information: through regular briefings and Q&As, regular Portal posts, regular newsletters and more

### Consistency

This means ensuring consistency of message, in all comms formats – but also across different council services, with partner councils, and Publica, too.

### Empowerment

Effective internal comms isn't just about news stories and briefings... managers, in particular, need to be empowered to communicate with their teams consistently and with confidence

### Multi-channel

In a busy environment, comms fragmentation is inevitable – so ensuring key messages are pushed at multiple touchpoints is essential





# Our communications & engagement strategy:

## Core principles

### High quality

Output must be high quality. Wherever possible it must be people-centric and easy to understand – whatever the format

### Two-way

Q&As, comment boxes, engagement surveys ensure that communication is two-way, not broadcast

### Measurable

Looking at data and getting feedback means we can track the effectiveness of internal communication – and adapt strategy accordingly



# Key considerations (2025 – 2026)

## Corporate Plan

Delivery of the Corporate Plan, which is being updated in mid-2025

## Implementing People & Culture Strategy

Creating a great environment for work as staff move into council employment – regular, consistent communication is key to this

## Transformation

Important 'change' programme based on financial constraints. With key design principles.

## Local Government Reorganisation

Proposals being submitted in November 2025 – an aligned and consistent internal comms programme will be developed with partner councils around this.

These are four of the major considerations that will govern approach and delivery around internal communications in 2025



# Our internal comms toolkit

This section sets out the best methods for internal comms at CDC, which deliver against those six core principles, while also being cost effective and proportionate.

With each of these 'methods' emphasis is on ensuring that content is of the same high quality that's expected from external communications.

## High quality content key to using all of these tools...

None of these tools will succeed without great content. This means great readability and visuals, but more importantly, really clear, relatable messages.

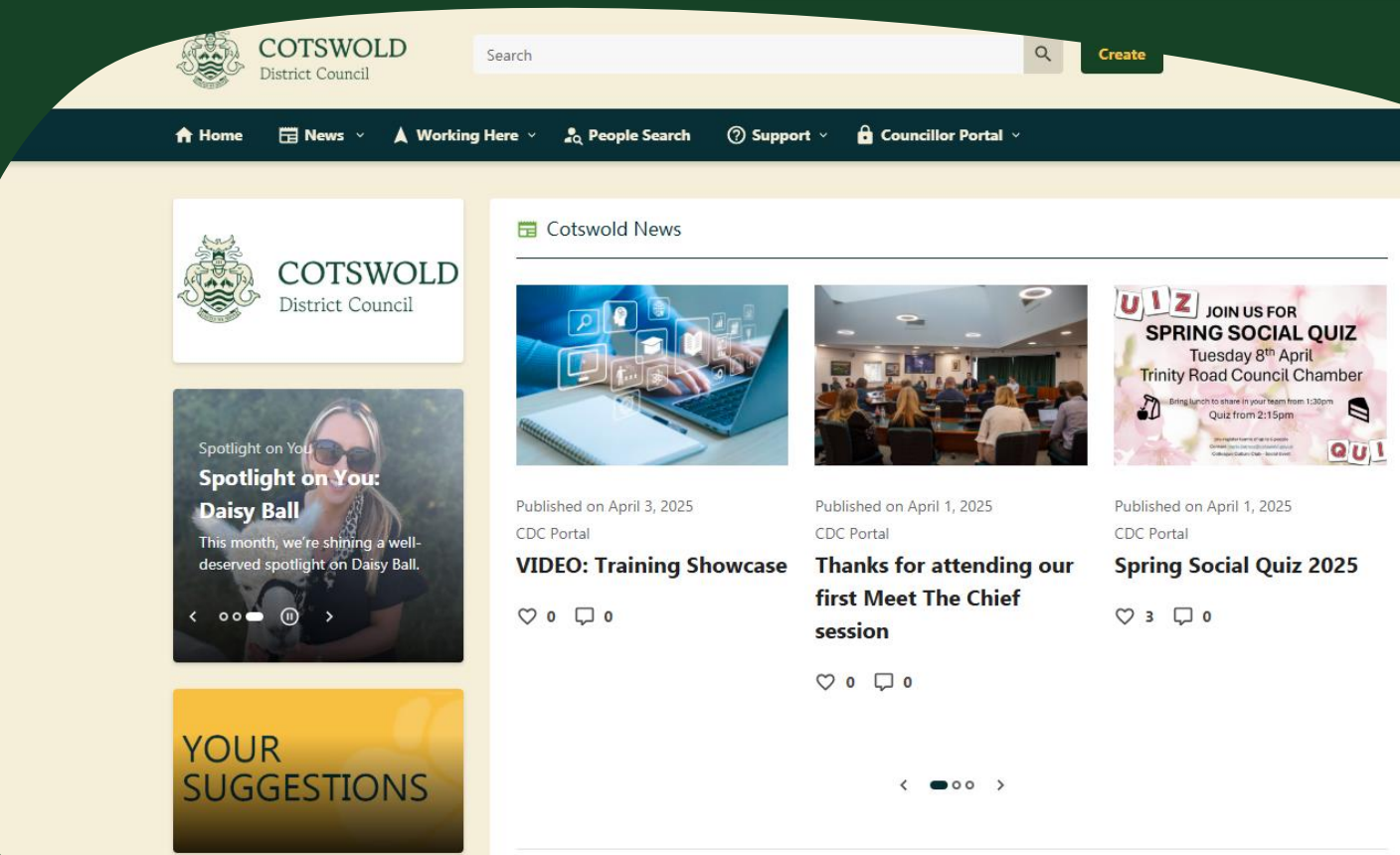


# The Portal: a key tool

The Portal is our most important internal communications tool, aligned with so many of the core principle areas that will drive effective engagement.

- It facilitates regular news and updates, with immediacy.
- It can host multimedia, rich and engaging.
- It enables for consistency with other councils in the Publica partnership.
- It is a repository for news and updates, which means we can link to it from other channels.
- We know that personable/human interest stories/updates perform well on the platform – which can drive culture.
- It can facilitate two-way engagement via commenting and a Communities functionality that we have not yet activated.
- It is measurable – we can track views and engagement

Core principle area	Met by The Portal?
Regularity	✓
Consistent	✓
Empowering	✓
Multi-channel	✓
High quality	✓
Two-way	✓
Measurable	✓



# The Portal

## How we'll use it:

- For all kinds of news updates - taking a digital first approach to share and post news with immediacy
- For sharing human interest and 'people-stories', similar to those previously shared in The Grapevine
- Create a calendar that maps awareness days, to ensure we're creating content that is relevant and resonates
- Develop an area dedicated to LGR
- Create a 'Cotswold community' - a place for staff to post messages, advertise social events, share updates or give shoutouts to colleagues
- Continue to give due consideration to ensuring content is engaging and accessible.
- Measure effectiveness – constantly, and learn from the data
- But critically, keep it simple! To manage and to use.

## Making enhancements:

- Drive more people to use and view The Portal:
  - Create a weekly round-up newsletter, topped with a short message from leader
  - Ensure new posts are emailed out
  - Encourage managers to get people engaging with The Portal
  - Use other IC tools – like QR codes on posters
- Create a 'community' area for staff – and 'publicise' it
- Develop an area dedicated to LGR
- Building out new sections: an area for 'human interest' stories... **an online "Grapevine" – this will be done through a proactive content plan**
- We will gather feedback on The Portal in internal engagement surveys
- Consider creating a section that is locked out to managers, empowering them to communicate better with staff



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# The Portal content pillars

Life beyond Trinity Road <i>Proactive</i>	Weekly CEO blog and leadership updates <i>Proactive</i>	Culture Club / Social Club <i>Proactive</i>	Shout outs / Spotlight on You <i>Proactive</i>	News/ announcements <i>Reactive</i>	LGR updates <i>Proactive/ Reactive</i>	Publica updates <i>Reactive/ proactive</i>
<ul style="list-style-type: none"> <li>Significant events for staff outside of work (Births, marriages)</li> <li>Good causes being supported</li> <li>Exceptional achievements</li> </ul> <p><b>Aligned with One Team value:</b> fosters respect, celebration of success, shows the human-side of colleagues, and helps to break down silos.</p>	<ul style="list-style-type: none"> <li>Blogs and vlogs from a variety of CDC leaders – particularly senior management team</li> <li>Sharing updates on key initiatives / projects</li> <li>Giving their thoughts on current events and their impact</li> </ul> <p>Central to '<b>Communicating with us</b>' in the People &amp; Culture Strategy. Ensures regular updates and leadership visibility.</p>	<ul style="list-style-type: none"> <li>Promoting upcoming events</li> <li>Sharing reports / highlights from events that have taken place</li> </ul> <p><b>Aligned with One Team value:</b> fosters respect, celebration of success, shows the human-side of colleagues, and helps to break down silos, promoting events.</p>	<ul style="list-style-type: none"> <li>Regularly highlighting staff successes – by asking managers to nominate</li> </ul> <p><b>Aligned with One Team value:</b> celebrates success, rewards and recognises achievements</p>	<ul style="list-style-type: none"> <li>News pieces on stories/updates as and when they happen (which don't fall into the pillars listed)</li> <li>Alignment with awareness days</li> </ul>	<ul style="list-style-type: none"> <li>An area dedicated to the constantly evolving LGR picture</li> <li>FAQs</li> <li>Documents</li> </ul>	<ul style="list-style-type: none"> <li>Stories / initiatives led by Publica which require visibility on the CDC portal</li> </ul>



# Events & briefings

Core principle area	Met by events?
Regularity	✓
Consistent	✓
Empowering	✓
Multi-channel	✓
High quality	✓
Two-way	✓
Measurable	✓

Events gather a captive audience. There are relatively simple devices (great slides, mixture of voices) that can make them highly engaging. And they offer a perfect chance to share updates and provide leadership visibility. When it comes to the P&CS behaviours, events can break down silos, foster collaboration and enhance an understanding of what different teams/colleagues do. They can also sharpen business focus.

**The strategy proposes at least two different types of events, led by leadership, hosted regularly but in conjunction with key campaign plans. See slide 20 onwards for proposed dates and topics.**

## One Team updates

These should be central to our IC strategy. Led by the CEO, but bringing in other voices, done well they have the potential to recognise success, ensure people are informed and have the latest updates, and for departments to share current priorities and work. This would represent CDC living its behaviours. ***Held every six weeks, for 90 minutes.***

## Manager briefings

Under the One Team and Set Up For Success behaviours, managers and leaders have a core responsibility to communicate clearly, break down silos, and drive alignment. These sessions, held at suitable points in the year and around key milestones, are designed to equip managers with the information they need to embed culture and manage effectively.

# Mock event agendas

## One Team update

90mins | Bimonthly | Hybrid

- **CEO intro**
- **Update / launch of key initiative** (i.e LGR, Corporate plan etc)
- **Service sharing** (a segment dedicated to services giving updates [on rotation] around what they're working on)
- **An update from the Culture Club** (to share upcoming events/initiatives)
- **Recognition and reward** (new starters, long service, Birthdays, shout outs)
- **Q&A:** with anonymous questions sent in advance

## Manager briefings

90mins | quarterly | hybrid/in-person

- **CEO intro**
- **Detailed updates on new initiatives** (i.e budget process) and what teams need to know
- **P&CS focus:** drilling into the different behaviours and values
- **HR update:** training, systems etc.
- **Q&A**



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# Display media

Display media – such as screensavers and posters – have the potential to positively influence workplace environment and employee behaviour. This medium isn’t currently being exploited by the council at all. There are some posters displaying H&S messages, but nothing that shares CDC values or behaviours. This presents a substantial opportunity if implemented in the right way. They can also include QR codes which maximise use of The Portal and signpost people to that resource. This would give a degree of measurability.

There are two ways CDC could do this:

Using login/lock screens to display changeable messages digitally



- This will require some link up with IT, but it means that before anyone logs in they see a well-designed visual with a key message – centrally controlled
- These can be changed frequently
- Managed by Comms with IT’s help

Strategically located posters

- Using posters (sparingly) means that key messages can be conveyed in high traffic areas, or where there is a captive audience: kitchens, toilets etc. **We have identified several key locations in workspace areas.**
- Posters need to be used sensibly, with due consideration for messages, but they offer great potential to amplify key messages for IC campaigns

Core principle area	Met by display?
Regularity	✓
Consistent	✓
Empowering	-
Multi-channel	✓
High quality	✓
Two-way	-
Measurable	✓

Making content visual, snappy and engaging is key!



# Indicative calendar (2025)

	2025							
	May	June	July	Aug	Sept	Oct	Nov	Dec
Events								
Manager briefings				Budget				
One Team updates (every 6 weeks)			7th	18th	30th		11th	16th
Meet The Chief								
Meet & Greet / Publica Picnic								
2025 campaigns (more detail in comms plan tabs)								
People & Culture Strategy								
LGR			Engagement survey				28th - submission	
Display media								
On rotation throughout the year								
Newsletter								
Weekly (Wednesday)								
Portal content								
CEO blog (Weekly, Wednesday)								
Life Beyond Trinity Road								
Shout outs								
LGR content (fortnightly, Wednesday)								

# Measuring effectiveness KPIs and objectives

Success may look different from campaign to campaign (i.e – we may want to think about metrics/feedback specific to the launch of the P&CS or Corporate Plan). But there are some general metrics that can be applied which will measure the effectiveness of internal engagement at CDC. *These metrics are based on baseline data presented within this document. They cover – where applicable – core principle areas. Delivery will be through specific campaigns and day-to-day activity.*

## Regularity

Minimum of **7** events before January 2026

Average of **30** Portal posts/stories per month before January 2026 – with good mix of story types

Develop at least **20** display media assets

## Participation

Ensure a minimum of **350** people are visiting the portal every month

Achieve average of **6,000** Portal page views per month before January 2026

Ensure all One Team briefings have a minimum of **100** attendees

## Engagement

Achieve an average of **50** engagements per month before January 2026

Develop a Portal 'community' for CDC staff

Ensure there are questions at **all** events

Use Comms to drive an average **50%+** survey completion rate for all surveys

## Feedback

Assess the **effectiveness of internal communications** in an employee engagement survey before end of 2025



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# Action plan



# Delivering against this strategy

- Complete
- On hold
- In progress
- Not started

Action	Target date	Owner	Status	Notes
Share draft with EMT & Culture Club for feedback	April 25	MA	●	Feedback received, amends made
Roll out of The Portal content pillars – call for participation and set out approach. <b><i>This includes weekly CEO blog.</i></b>	May 25	KW/CW/RW	●	New content being continually rolled out – incl. weekly CEO blog, leadership updates, features on staff, shout outs – content plan populated monthly
Launch internal newsletter	June 25	KW/CW/RW	●	Newsletter launched, shared weekly on Wednesday via email
Create schedule of hybrid One Team briefings	July 25	MA	●	Six-weekly all-staff briefings scheduled until December 25. First held in July, successfully – with first hybrid session on August 19th
Develop LGR page on The Portal	July 25	MA/RW	●	LGR page with latest slides, dates and FAQs, being updated regularly
Launch 'Communities' section on The Portal	May 25	MA/RW	●	On hold, awaiting further feedback and consideration
Create schedule of manager briefings	May 25	MA	●	First briefing arranged in August on budgets – more to follow based on appetite of CLT
Develop plan for annual engagement survey	Dec 25	AC/MA/CT	●	Work underway to set target timeframe and develop questions
Work with Glos comms colleagues on LGR internal comms action plan	Aug 25	MA	●	Work underway to develop action plan with comms colleagues – various activity delivered already
Roll out display media	May 25	MA	●	On hold while finalising technicalities – ready for P&CS launch
First report on progress / effectiveness	Autumn 25	MA	●	Pulse survey / metrics to be reviewed in autumn

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Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET 4 SEPTEMBER 2025</b>
Subject	<b>FINANCIAL PERFORMANCE REPORT – Q1 2025/26</b>
Wards affected	All
Accountable member	Cllr Patrick Coleman, Cabinet Member for Finance Email: <a href="mailto:patrick.coleman@cotswold.gov.uk">patrick.coleman@cotswold.gov.uk</a>
Accountable officer	David Stanley, Deputy Chief Executive and Section 151 Officer Email: <a href="mailto:david.stanley@cotswold.gov.uk">david.stanley@cotswold.gov.uk</a>
Report author	Michelle Burge, Chief Accountant and Deputy Section 151 Officer Email: <a href="mailto:david.stanley@cotswold.gov.uk">david.stanley@cotswold.gov.uk</a>
Summary/Purpose	This report sets out the first budget monitoring position for the 2025/26 financial year.
Annexes	Annex A – Capital Programme Outturn Forecast Annex B – Non-Treasury Management Prudential Indicators
Recommendation(s)	That Cabinet resolves to: <ol style="list-style-type: none"> <li>1. Review and notes the financial position set out in this report.</li> <li>2. Endorse the approach to financial management for 2025/26 as set out in paragraph 4.8 of the report.</li> <li>3. Endorse the principle to transfer any additional year-end surplus to the Transformation and Capacity Building earmarked reserves, as set out in paragraphs 4.10 to 4.11 of the report.</li> <li>4. Endorse the principle to transfer 50% of any year-end Planning Fee income (over and above the budgeted level) to the Planning Appeals earmarked reserve, as set out in paragraph 4.22 of the report.</li> </ol>
Corporate priorities	<ul style="list-style-type: none"> <li>• Delivering Good Services</li> </ul>



Key Decision	YES
Exempt	NO
Consultees/ Consultation	None





## **1. BACKGROUND**

- 1.1** This report provides members with the initial outturn forecast and monitoring position statement for the 2025/26 financial year.
- 1.2** The purpose of this report is to notify members of any significant variations to budgets, 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. Whilst inflationary pressures have eased over the last 12 months, some short-term risk remains with inflation likely to be above the Bank of England's 2.0% target for some months. The uncertainty across the wider global economy and around UK inflation and interest rates in the current financial year will exert an influence over the Council's revenue and capital budgets both directly and indirectly.

## **2. EXECUTIVE SUMMARY**

- 2.1** This report sets out the outturn forecast for the financial year informed by Q1 budget monitoring.
- 2.2** Overview and Scrutiny Committee considered this report at their meeting on 01 September 2025.
- 2.3** Based on the budget monitoring exercise undertaken for Q1 and an assessment of the risks and uncertainties facing the Council, the outturn forecast is a positive variation of £0.097m. This will provide the opportunity additional financial sustainability over the MTFS-period.



**Table ES1 – Revenue Budget Outturn Forecast (Q1)**

	2025/26 Latest Net Budget (£'000)	2025/26 Actuals to Q1 (£'000)	2025/26 Outturn Forecast (£'000)	2025/26 Outturn Variance (£'000)
<b>Revenue Budget</b>				
<b>Subtotal Services</b>	<b>19,165</b>	<b>4,366</b>	<b>18,958</b>	<b>(208)</b>
Less: Reversal of accounting adjustments	(1,925)	0	(1,925)	0
<b>Revised Subtotal Services</b>	<b>17,241</b>	<b>4,366</b>	<b>17,033</b>	<b>(208)</b>
Corporate Income & Expenditure	(1,537)	(421)	(1,550)	(13)
Provisions and Risk Items	0	0	125	125
<b>Net Budget Requirement</b>	<b>15,705</b>	<b>3,945</b>	<b>15,608</b>	<b>(97)</b>
<b>Funded by:</b>				
Council Tax	(7,065)	0	(7,065)	0
Retained Business Rates	(5,117)	2,403	(5,117)	0
Government Funding - Grants	(2,527)	(635)	(2,527)	0
Government Funding - NHB	(820)	(205)	(820)	0
Extended Producer Responsibility (EPR)	(1,502)	0	(1,502)	0
Collection Fund (surplus) / Deficit	689	0	689	0
<b>TOTAL Funding</b>	<b>(16,342)</b>	<b>1,563</b>	<b>(16,342)</b>	<b>0</b>
<b>Budget shortfall/(surplus)</b>	<b>(637)</b>	<b>5,508</b>	<b>(734)</b>	<b>(97)</b>



**Table ES2 – Revenue Budget – Reconciliation of variations (Q1)**

	<b>Positive variation (£'000)</b>	<b>Adverse Variation (£'000)</b>	<b>Net Outturn Variance (£'000)</b>
<b>Variations at a glance</b>			
<b><u>Service Variations</u></b>			
Fees & Charges - Cemeteries		38	38
Fees & Charges - Licensing	(16)		(16)
Fees & Charges - Car Parks	(55)	0	(55)
Commercial Property - Rental income		61	61
Fees & Charges - Development Management	(249)		(249)
Legal Services - Salary underspend	(41)		(41)
Postage and Printing (Revenue & Benefits)		29	29
Other service variations		50	50
<b>Subtotal</b>	<b>(361)</b>	<b>178</b>	<b>(183)</b>
<b><u>Non-Service/Corporate Variations</u></b>			
Street Service - review of service specification	0	150	150
Development Management Fees - Appeals Risk	0	125	125
Treasury Management income	(188)	0	(188)
<b>Subtotal</b>	<b>(188)</b>	<b>275</b>	<b>87</b>
<b>Net Outturn Variation</b>	<b>(549)</b>	<b>453</b>	<b>(97)</b>

- 2.4** Members should note that whilst the outturn forecast is favourable there remain concerns around financial performance in certain service areas – particularly services where the Council's net revenue budget is dependent on income from fees and charges.
- 2.5** Income and expenditure budgets will continue to be monitored throughout the financial year. In some instances, income budgets for 2025/26 have been adjusted downward to reflect historic underachievement of income. However, this should not be seen as a desirable outcome – more that it recognises in setting the budget for the forthcoming financial year the estimates need to be robust in the context of current financial performance. .
- 2.6** Heads of Service should take steps to identify management action(s) that will address underperformance and discuss these with the finance team and the relevant Director.



Financial Performance Reports in 2025/26 will include options and recommendations for corrective action where underperformance against the budget has been identified, and options for improving financial performance even if the service is achieving income and expenditure targets.

- 2.7** Heads of Service should explain financial performance in the context of service performance and outcomes. There is a risk that aspects of service performance may be reported as on or above target, with little or no reference to financial performance.
- 2.8** The financial and service reporting framework will continue to be developed by Finance and the Business and Intelligence service. This will ensure performance reporting is aligned and will support the service leads to identify potential mitigations and resolutions to improve performance.
- 2.9** As set out in the CIPFA Financial Management Code, performance reporting is important for the Council to remain financially sustainable. Members must receive timely information on its financial and operational performance so that corporate priorities are delivered within budget. Early information about emerging risks to financial sustainability are key to ensuring the Council can take effective decisions and carefully consider an effective response.
- 2.10** The Council must ensure it can address the financial challenges arising from the Fair Funding review ("FF 2.0") and Local Government Reorganisation ("LGR") over the MTFS-period.
- 2.11** Oversight of the Vacancy Management process has been strengthened by the Corporate Leadership Team ("CLT"), with CLT authorisation required to fill a vacancy, either on a short-term or long-term basis. CLT have also reviewed the process for assessing requests for additional resources to ensure a single and consistent approach is taken to the development and appraisal of proposals and business cases.
- 2.12** As set out in paragraph 2.3 and Table ES1, the initial outturn forecast for the year is favourable with an increased surplus likely at the end of the financial year.
- 2.13** The revenue budget is likely to come under further pressure in 2026/27 and 2027/28 as the Council considers the impact from LGR and ensures services continue to be provided to residents as usual. There will be a demand on key staff to support the assessment of final proposal and plan for a new unitary structure in Gloucestershire, and implementation of the proposal from mid-2026 following the Government's decision.



**2.14** It is expected that additional capacity will be needed to support the emerging Corporate Plan, ensure services continue to be provided to residents, and support LGR. Therefore, it is proposed to maximise the level of resources available over the next 2 years, any additional budget surplus or one-off benefit is transferred to earmarked reserves at year end, subject to the final outturn position:

- Transformation and Change
- Capacity Building

**2.15** The material forecast variations are listed below with further details in Section 4 of this report.

- **Forecast income variations** – underachievement: Cemeteries (£38k), Additional Income: Licensing (£16k)
- **Car Parks** income from car park fees above budget (£55k)
- **Development Management Fees** – exceeded budget by £0.249m
- **Legal** - staff costs below budget due to vacancies filled from Q2/Q3 and contract lawyer post remaining vacant.
- **Post and Printing** - costs forecast to exceed budget by £29k, predominantly within the Revenues and Benefits service.
- **Commercial Property** rental income and vacant property costs (£61k adverse variation)
- **Street Services** for the purposes of this report, it is prudent to include a £0.150m risk variation against the £0.300m savings target.
- **Treasury Management** and interest receivable performance (£0.189m positive variation).

**2.16** The 2025/26 pay award was agreed in July 2025 at 3.2%. The financial impact is in line with the assumption of 3% included in the 2025/26 budget and MTFS.

**2.17** A summary of the Capital Programme outturn forecast is shown in the table below.



**Table ES3 – Capital Programme Outturn Forecast**

Capital Programme	2025/26 OB (£'000)	Slippage From 2024/25 (£'000)	2025/26 LAB (£'000)	2025/26 Actuals to Q1 (£'000)	2025/26 Outturn (£'000)	2025/26 Outturn Variance (£'000)
Leisure & Communities	0	64	64	20	64	0
Housing/Planning and Strategic Housing	1,718	127	1,845	353	1,600	(245)
Environment	1,132	202	1,334	97	1,259	(75)
Retained & Corporate	0	0	0	0	0	0
ICT, Change and Customer Services	350	0	350	0	350	0
UK Rural Prosperity Fund	0	0	0	0	0	0
UK Shared Prosperity Fund Projects	327	0	327	31	327	0
Land, Legal and Property	500	172	672	0	672	0
Transformation and Investment	0	0	0	0	0	0
<b>TOTAL Capital Programme</b>	<b>4,027</b>	<b>565</b>	<b>4,592</b>	<b>501</b>	<b>4,272</b>	<b>(320)</b>

**2.18** The capital programme is a forecast underspend of £0.320m. Further details are provided in Section 6 of this report.

**2.19** Financial Performance reports will be presented to members at the November 2025 and March 2026 Cabinet meeting with the outturn position likely to be finalised for the July 2026 Cabinet meeting.

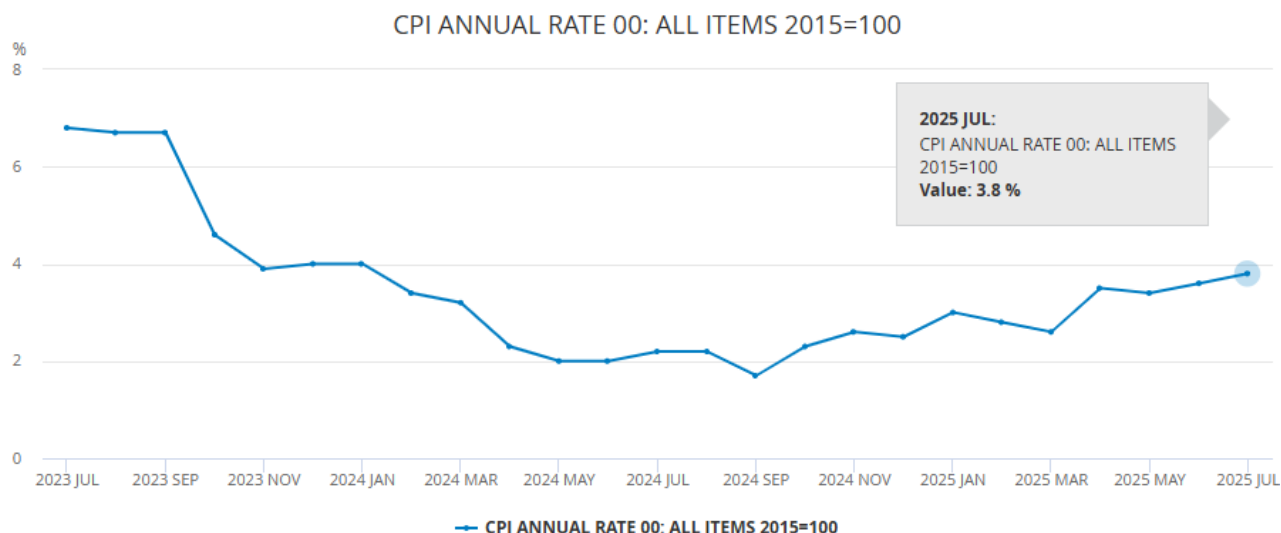
### **3. EXTERNAL ECONOMIC ENVIRONMENT**

#### **Inflationary Pressures**

**3.1** The level of inflation, as measured by the Consumer Prices Index, for July 2025 increased to 3.8% (from 3.6% in June 2025). Although it is not the Government's preferred measure of inflation, the Retail Prices Index is 4.8% (4.4% in June 2025). Core inflation (as defined by the Office for National Statistics as the CPI Rate excluding energy, food, alcohol, and tobacco) rose to 3.8% (3.7% in June 2025).



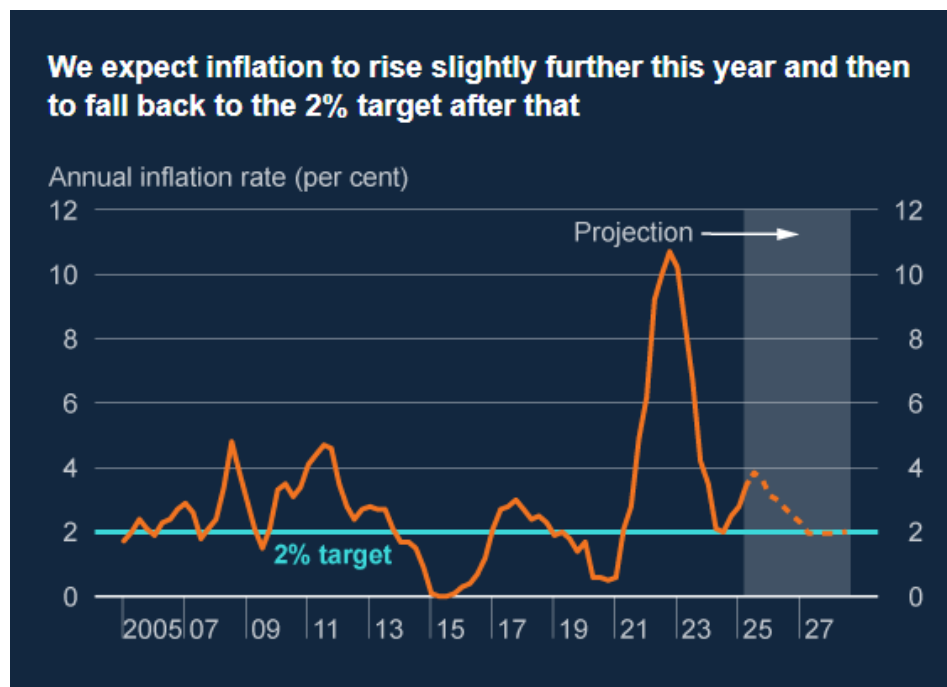
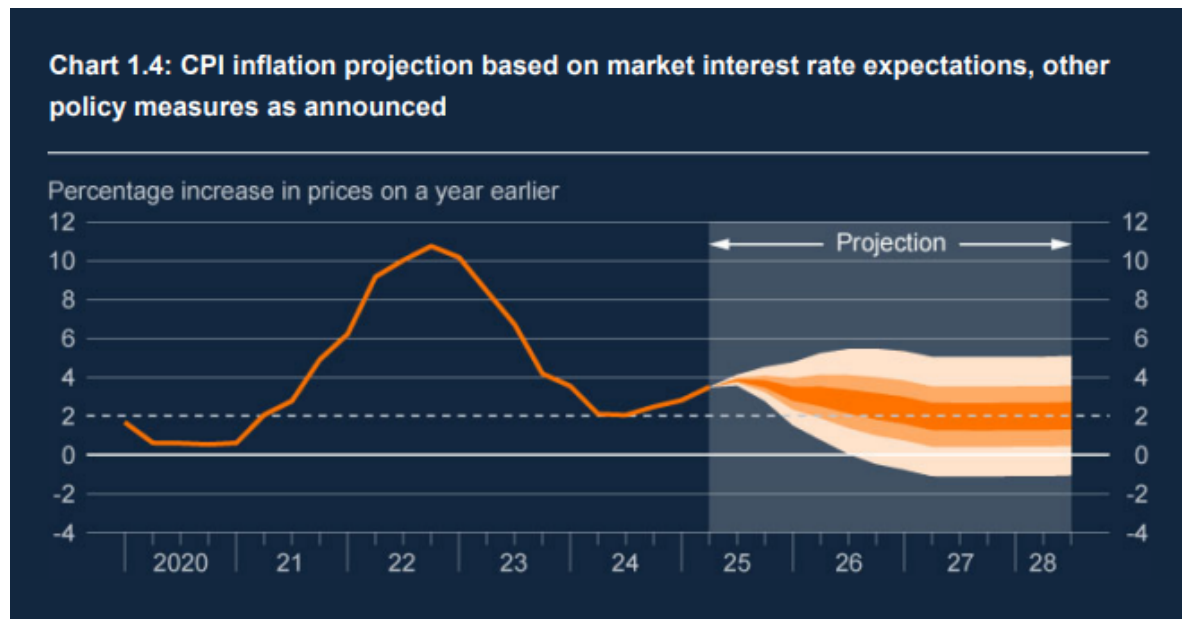
## Graph A – CPI Inflation



- 3.2** Although there has been substantial disinflation over the past two years, 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.
- 3.3** In the August 2025 Monetary Policy Report, the Bank of England indicated the rate is likely to remain above the 2% target during 2025 (peaking at around 4.0%) as the impact from higher food prices comes through. Inflation is expected to fall back to the 2% target after that. The graph below shows the different CPI forecasts that are published in the quarterly Bank of England Monetary Policy Committee report (August 2025).



## Graph B – Bank of England Fan Chart - Inflation



## Interest Rates

- 3.4** The Bank of England reduced the Base rate in August 2025 by a further 0.25% in response to “substantial disinflation over the past two and a half years” taking the base rate to 4.00% The council’s treasury management advisors have forecast that the rate

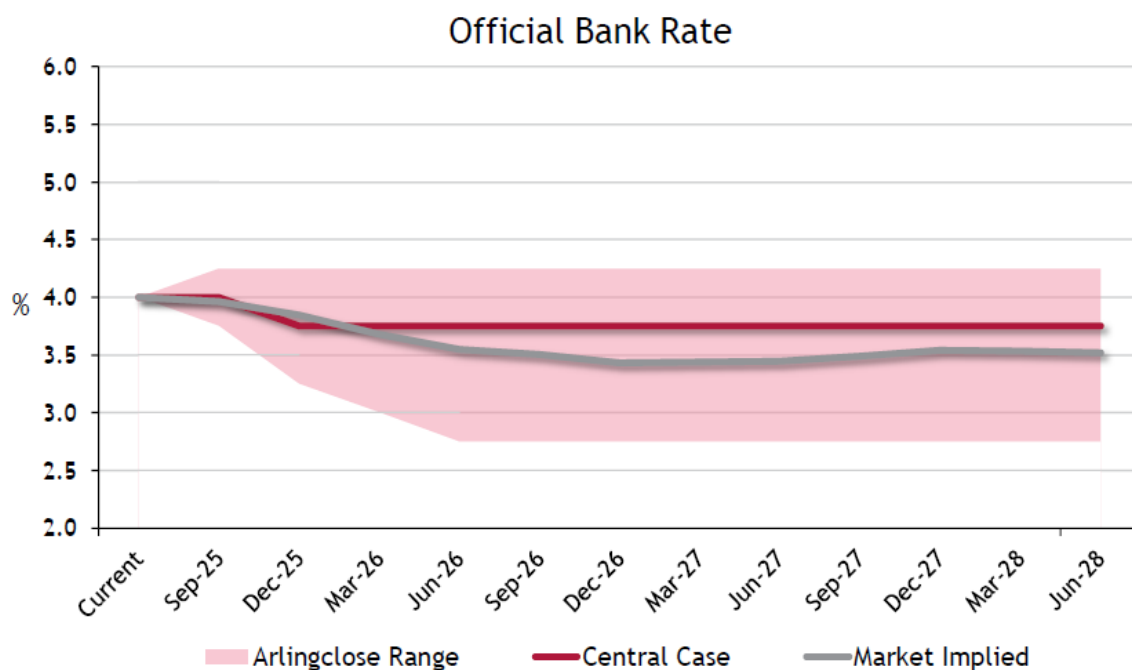




will continue to reduce, with one further cut expected in 2025. The next MPC meeting is scheduled for 18 September 2025.

- 3.5** The expectation is for further rate reductions during 2025 (aligned to the publication of the Monetary Policy Report each quarter) to a low of 3.75%. However, with the July 2025 inflation rate increasing, there may be a reduced opportunity for further rate reductions in the calendar year.

**Graph C – Interest Rate Forecast (August 2025)**



- 3.6** The Council has limited and reducing internal resources to support the capital programme (capital receipts, earmarked reserves). Unless further capital receipts are received as a result of asset disposals, the Council will need to undertake prudential borrowing.

#### **4. 2025/26 REVENUE BUDGET FORECAST**

- 4.1** The Revenue Budget was approved by Council at their meeting on 24 February 2025 with no adjustments made during the financial year to date.



**Table 1 – Revenue Budget reconciliation**

<b>Budget Item</b>	<b>(£'000)</b>
Original Budget (Council, 24 February 2025)	15,704
Adj:	
Adj:	
Adj:	
Adj:	
<b>Latest Budget</b>	<b>15,704</b>

- 4.2** The revenue budget will be adjusted during the financial year as budgets are amended to reflect the transfer of services from Publica to the Council in Phase 2 of the Publica Transition. Whilst the net budget position (£15.704m) will not change, the composition of the budget (i.e. subjective split between Pay and Non-Pay budgets) and net service budgets will be amended in Q2.
- 4.3** With Phase 2 services and direct budgetary responsibility transferring from Publica to the Council in July 2025 members should expect to see material adjustments to service budgets in the financial performance reports during 2025/26.
- 4.4** As of 30 June 2025 (Q1) the Council's net expenditure (excluding Funding and Parish Precepts) was £3.945m against the profiled budget of £4.327m.
- 4.5** The outturn forecast for 2025/26 of £15.483m results in a forecast variance of £0.097m. Table 2 provides members with an overview of the material outturn variations that have been forecast across services with Tables 3 providing detail on the non-service revenue expenditure and income budgets.



**Table 2 – Revenue Budget Outturn Forecast Summary**

	2025/26 Latest Net Budget (£'000)	2025/26 Actuals to Q1 (£'000)	2025/26 Outturn Forecast (£'000)	2025/26 Outturn Variance (£'000)
<b>Revenue Budget</b>				
Environmental & Regulatory Services	695	144	678	(16)
Business Sup. Svcs - Finance, HR, Procurement	1,425	435	1,425	0
ICT, Change & Customer Services	2,502	632	2,502	0
Assets, Property & Regeneration	838	273	833	(4)
Publica Executives and Modernisation	104	26	104	0
Revenues & Housing Support	842	1,154	871	30
Environmental Services	4,761	812	4,744	(17)
Leisure & Communities	2,359	360	2,374	16
Planning & Strategic Housing	1,682	(452)	1,433	(249)
Democratic Services	1,366	333	1,362	(3)
Retained and Corporate	2,593	649	2,631	38
<b>Subtotal Services</b>	<b>19,165</b>	<b>4,366</b>	<b>18,958</b>	<b>(208)</b>
Less: Reversal of accounting adjustments	(1,925)	0	(1,925)	0
<b>Revised Subtotal Services</b>	<b>17,241</b>	<b>4,366</b>	<b>17,033</b>	<b>(208)</b>
Corporate Income & Expenditure	(1,537)	(421)	(1,550)	(13)
Provisions and Risk Items	0	0	125	125
<b>Net Budget Requirement</b>	<b>15,705</b>	<b>3,945</b>	<b>15,608</b>	<b>(97)</b>
<b>Funded by:</b>				
Council Tax	(7,065)	0	(7,065)	0
Retained Business Rates	(5,117)	2,403	(5,117)	0
Government Funding - Grants	(2,527)	(635)	(2,527)	0
Government Funding - NHB	(820)	(205)	(820)	0
Extended Producer Responsibility (EPR)	(1,502)	0	(1,502)	0
Collection Fund (surplus) / Deficit	689	0	689	0
<b>TOTAL Funding</b>	<b>(16,342)</b>	<b>1,563</b>	<b>(16,342)</b>	<b>0</b>
<b>Budget shortfall/(surplus)</b>	<b>(637)</b>	<b>5,508</b>	<b>(734)</b>	<b>(97)</b>



**Table 3 – Corporate Income and Expenditure/Provisions and Risk**

	2025/26 Revised Budget (£'000)	2025/26 Actuals to Q1 (£'000)	2025/26 Outturn Forecast (£'000)	2025/26 Outturn Variance (£'000)
<b>Corporate Income and Expenditure</b>				
Savings & Contingency Items	598	(78)	773	175
Treasury Management - Interest Payable	5	1	5	0
Treasury Management - Interest Receivable	(1,303)	(345)	(1,491)	(188)
Minimum Revenue Provision (MRP)	9	0	9	0
Transfer to/(from) Earmarked Reserves	(846)	0	(846)	0
	<b>(1,537)</b>	<b>(421)</b>	<b>(1,550)</b>	<b>(13)</b>
	2025/26 Revised Budget (£'000)	2025/26 Actuals to Q1 (£'000)	2025/26 Outturn Forecast (£'000)	2025/26 Outturn Variance (£'000)
<b>Provisions and Risk</b>				
Development Management Fees - Appeals Risk			125	125
	<b>0</b>	<b>0</b>	<b>125</b>	<b>125</b>

- 4.6** As outlined, the forecast outturn position is a net underspend/favourable variance of £0.097m which increases the level of budgeted surplus in-year.
- 4.7** The Council must ensure it can address the financial challenges arising from the Fair Funding review ("FF 2.0") and Local Government Reorganisation ("LGR") over the MTFS-period.
- 4.8** Oversight of the Vacancy Management process has been strengthened by the Corporate Leadership Team ("CLT"), with CLT authorisation required to fill a vacancy, either on a short-term or long-term basis. CLT have also reviewed the process for assessing requests for additional resources to ensure a single and consistent approach is taken to the development and appraisal of proposals and business cases.
- 4.9** As set out in paragraph 2.3 and Table ES1, the initial outturn forecast for the year is favourable with an increased surplus likely at the end of the financial year.



- 4.10** The revenue budget is likely to come under further pressure in 2026/27 and 2027/28 as the Council considers the impact from LGR and ensures services continue to be provided to residents as usual. There will be a demand on key staff to support the assessment of final proposal and plan for a new unitary structure in Gloucestershire, and implementation of the proposal from mid-2026 following the Government's decision.
- 4.11** It is expected that additional capacity will be needed to support the emerging Corporate Plan, ensure services continue to be provided to residents, and support LGR. Therefore, it is proposed to maximise the level of resources available over the next 2 years, any additional budget surplus or one-off benefit is transferred to earmarked reserves at year end, subject to the final outturn position:
- Transformation and Change
  - Capacity Building
- 4.12** This assumes that there are no additional expenditure commitments that would require support from the Financial Resilience Reserve (FRR). For the avoidance of doubt, the working assumption in the outturn forecast is:
- there is no material deterioration in the outturn forecast in Q2-Q4.
  - additional expenditure in any particular service area is offset by a corresponding decrease in expenditure in other service areas.

### **Key Variations**

- 4.13** 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.
- 4.14** For the purposes of this report a risk provision of £0.150m has been included against the cost reduction of £0.300m included in the 2025/26 revenue budget for the **Street Cleaning**. Initial scoping work has identified cost reductions and service efficiencies; a wider review of service options is being undertaken to ensure service standards are clearly defined with corresponding cost reductions. Following a review of service operations by APSE (Association of Public Service Excellence), and options for cost reduction are being reviewed and tested ahead of any decision on service design.



Further due diligence will be undertaken on the scope and delivery of cost reductions for consideration by Cabinet during 2025/26.

- 4.15** Where income shortfalls have been forecast, it is expected that Business Managers and Assistant Directors evaluate options for corrective action. 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 financially sustainable.
- 4.16 Cemetery fees** – forecast shortfall in income of £38k due to lower service use in Q1. Whilst this position may change during the year, it is prudent for budget monitoring purposes to include the variation.
- 4.17 Licensing income** – is forecast to exceed budget by £16k largely in respect of taxi drivers' licences.
- 4.18 Development Management fees** - overachievement of planning fees by £0.249m at Q1. This includes £0.389m of Planning Fees (13 Major and 401 Other) (budget of £0.219m) £0.049m of Pre-Application fees (69 from developers and 65 from households) (budget of £0.036m). 372 non-fee applications have also been processed.
- 4.19** The service has overachieved in planning application fee income as a result of a series of major housing and other developments that came forward within Q1. Following the changes to the National Planning Policy Framework in December 2024, the Council can no longer demonstrate a 5-year housing land supply. This has resulted in a number of speculative housing developments coming forward in Q1:
- 195 dwellings in Moreton-In-Marsh
  - 98 dwellings in Fairford
  - 120 dwellings in Mickleton
  - Solar farm near Siddington.
- 4.20** Whilst it is difficult to forecast whether this increase in major developments will continue, the team are receiving a number of pre-application enquiries relating to other potential future developments. There is a strong likelihood that further schemes will come forward throughout the rest of the financial year if a number of these pre-applications progress to full application stage.
- 4.21** This increase in planning applications (and associated income from fees) for major housing developments does bring additional risks. As a large number of these schemes are speculative, it is likely that a number will be refused permission and will



therefore result in appeals. Given the scale of development, there is a high chance appeals are dealt with as informal hearings or inquiries which bring greater costs to the Council. Planning permission was recently refused for 54 dwellings in Lechlade, which is likely to result in an appeal submission in late 2025/early 2026.

**4.22 It is proposed to hold 50% of the forecast additional income as a risk provision. This will have the effect of reducing the net variation during the financial year. Subject to the final outturn position for Development Management Fees remaining positive (i.e. income received in the year is above the budgeted level), it is also proposed that 50% of the variation is transferred to the Planning Appeals reserve.**

**4.23** The Council is not expected to achieve the budgeted level of commercial rental income from its **Investment Properties** due to ongoing economic challenges in the retail and office sectors, which are exerting downward pressure on rents. A forecasted income shortfall of £0.061m is forecast primarily related to the out-of-district investment property (former Wilko's store in Great Bridge, Tipton). A lease with a new tenant was agreed earlier in the calendar year with occupation commencing in July 2025 following fit-out. In common with most commercial lettings, the lease agreement includes a six-month rent-free period. The variation arises due to the new lease commencing later than anticipated than the budget assumption, and additional empty property costs over the time period.

**4.24** Reduced energy costs following the installation of Solar PV at Trinity Road and rental income from the **tenanted areas of Trinity Road Offices** is currently on track to meet the budgeted target of £0.025m for the 2025/26 financial year. Updates from Watermoor Point (live data dashboard highlighting occupation and enquiries) assist officers alongside the more formal quarterly performance meetings.

**4.25** Income from the Council's **Car Parks** has performed positively in the first quarter of 2025/26 exceeding budget by £0.055m. Income from Car park permits, and Penalty Charge Notices (PCNs) is on target for the first quarter of the financial year. Income budgets for 2025/26 were reduced to reflect current financial performance and ensure the budget estimates approved by Council in February 2025 were robust. However, the service will need to develop an action plan setting out options to address the financial performance including a review the car park strategy and approach to enforcement.



- 4.26 Building Control** – Q1 has seen an improvement in performance compared to 2024/25. Market share is averaging 69% in Q1 with 140 applications processed, reflecting a 12% increase in market share compared to the same period last year. Application volumes have remained steady, with only a slight year-on-year increase of 9. Q1 expenditure is below budget by £13k due to a vacancy and income has exceeded the budget by £0.013m. The building regulation fees were increased for the 2025-26 financial year to better reflect the costs of running the service. The service has also identified an opportunity to increase market share. Forecast outturn is currently reported as being in line with budget but will be reviewed in Q2.
- 4.27 Public Conveniences** – Income from public conveniences charges is in line with the budget. Further options will need to be considered during 2025/26 to ensure the net subsidy required to operate the Public Conveniences of £0.164m (2025/26 budget excluding depreciation and assumes income from fees of £0.110m) can be minimised or reduced entirely.
- 4.28 Land Charges** – income is on target, at Q1 (£0.048m). Application volumes have seen a notable increase in Q1 2025/26, with 446 searches received, compared to 355 in Q1 2024/25. This represents a 26% year-on-year rise, significantly above the typical quarterly average of around 340 applications.
- 4.29 Green Waste** fees are expected to achieve budgeted income of £1.588m by the third quarter of the 2025/26 financial year, income is (£0.045m) below the profiled budget at Q1. There is an expectation that additional licences will be issued between July and September (925 were issued during this period in 2024/25) particularly if the district experiences more rainfall that it has over recent months.
- 4.30 The Council's shared legal service**, delivered in partnership with West Oxfordshire District Council and Forest of Dean District Council, is forecast to be underspent by (£0.041m) by year end. This variance is primarily due to vacancies in two shared roles: a Paralegal and a Property Lawyer, both of which have not yet been appointed but are expected to commence in Q2 and Q3 respectively. Additionally, a vacancy remains for a Contract Lawyer, which is not expected to be filled.
- 4.31** Despite an increase in budget of £0.030m in 2025/26, Expenditure in respect of **postage and printing** within the revenues and benefits service is forecast to be overspent by £0.029m by the end of the financial year. Additional analysis will be





required in 2025/26 to understand the position and analyse the cost pressure arising from the additional work associated with the LIFT project.

**4.32 Ubico Contract** – the Council’s Environmental (grounds maintenance, street cleaning, domestic waste collection, recycling collections etc) are provided by Ubico Ltd. The contract with Ubico for 2025/26 of £8.863m is forecast to cost £8.912m – an adverse variation of £0.049m This is predominantly due to additional costs of £0.091m due to higher than estimated vehicle hire and repair costs offset by savings from lower than budgeted diesel costs due to favourable pump price compared to budget (£0.039m). Officers will work closely Ubico with the expectation that the service should be delivered within the contract sum and the forecast overspend should be mitigated/absorbed elsewhere within the contract. The table below provides members with an overview of the financial performance of the Ubico Contract (table 5).

**Table 5 – Ubico Contract Monitoring**

<b>Waste, Recycling, Street Cleaning and Grounds Maintenance Services</b>	<b>Ubico Contract Costs OB (£'000)</b>	<b>Ubico Contract Costs CS (£'000)</b>	<b>Outturn (£'000)</b>	<b>Outturn Variance (£'000)</b>
Car Parks GM [CTW668]	68	68	67	(1)
CCM001 Cemetery/Churchyards GM [CTW688]	166	166	162	(4)
RYC002 Garden Waste Collection [CTW634]	1,310	1,310	1,303	(6)
WST001 Household Waste [CTW611]	1,844	1,844	1,846	2
RYC001 Recycling [CTW633]	3,340	3,340	3,396	56
RYC003 Refuse/Recycling/Food Waste [CTW635]	732	732	733	1
STC001 Street Cleaning [CTW666]	1,387	1,387	1,388	1
Trinity Road Offices GM [CTW668]	17	17	17	(0)
<b>Grand Total</b>	<b>8,863</b>	<b>8,863</b>	<b>8,912</b>	<b>49</b>
<b>Net variation on contract</b>				<b>49</b>

### **Treasury Management**

**4.33** Dividends from the Council’s longer-term investments (Pooled funds and Real Estate Investment Trusts) of £0.150m were received in the three months to the 30 June 2025 year achieving a return of 6.31% Interest from short term cash deposits including the Debt Management Office (DMO) was £0.199m due to higher surplus balances and interest rates remaining at a higher level than assumed in the budget and MTFS.



- 4.34** It should be noted that the budgeted level of net investment income for 2025/26 is £1.208m – a decrease of £0.077m over the 2024/25 budgeted level and recognises the current interest rate position. This is a prudent estimate for the year and is lower than the final 2024/25 level of investment income achieved of £1.621m given the forecast interest rate reductions over the financial year.
- 4.35** It is not expected that the current interest rate level will be maintained over the MTFS period, as set out in Section 3 of this report, with expectations of investment income in 2026/27 reducing to around £0.700m with a further reduction to £0.500m by 2027/28.
- 4.36** A prudent forecast of investment income has been included in the outturn forecast of £1.327m. This includes the expectation that the base rate will continue to reduce, with two further cuts expected in 2025.
- 4.37** The level of investment income for the year will depend on the performance of both short-term investments (Money Market Funds, deposits with the DMO) and dividends from the long-term investment. The table below provides members with a high-level overview of the Council's Treasury Management investments on 30 June 2025.



**Table 6 – Treasury Management Investments**

<b>Investment type</b>	<b>Balance invested at 30/06/25 (£'000)</b>	<b>Investment Income received to 30/06/25 (£'000)</b>	<b>2025/26 Forecast (£'000)</b>
Bank of England DMDAF	7,650	94	418
<b>Money Market Funds</b>			
Federated Money Market Fund	3,000	33	132
DGLS Money Market Fund	3,000	33	132
Insight Liquidity Money Market Fund	3,000	27	127
Lloyds Instant Access	1,780	4	16
Other Short-term deposits	1,001	8	10
<b>Real Estate Investment Trusts (REIT)</b>			
Fundamentum Housing REIT	660	8	30
<b>Cash Plus Fund</b>			
Federated Cash Plus Fund	1,222	-	-
<b>Pooled Funds</b>			
CCLA Property Fund	2,198	25	93
Shroders Income Maximiser Fund	908	10	54
CCLA Better World Multi Assets Fund	938	11	30
M&G UK Income Fund	1,880	54	104
Ninety-One Investec Diversified Fund	1,823	21	98
Columbia Threadneedle Bond Fund	1,958	21	83
	<b>31,018</b>	<b>349</b>	<b>1,327</b>

**4.38** Council approved the Capital Strategy and the Treasury Management Strategy (including the Non-Treasury Management Investment Strategy) at their meeting on 24 February 2025. 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.



**4.39** The CIPFA Code was updated in 2021 and includes the new requirement, mandatory from 01 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. Section 6 and **Annex C** of this report provides members with an overview on the non-treasury position.

### **Corporate Income and Expenditure, Provisions, and Risk**

**4.40** As outlined in Tables 3 and 4 there are 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.

**4.41** As outlined earlier in the report, a risk provision of £0.150m has been included in the outturn forecast for the Street Cleaning savings against a target of £0.300m.

**4.42** As outlined earlier in this section, the performance of the Council's Treasury Management Investments is a result of higher than anticipated interest rates and surplus balances to invest.

## **5. PUBLICA REVIEW**

**5.1** Council approved the Detailed Transition Plan for Phase 2 of the transition of services from Publica at their meeting in March 2025. The 2025/26 revenue budget included provision for increased cost of services estimated at £0.225m (£0.300m full-year impact) as per the MTFS report, with the DTP revising the estimate to £0.245m.

**5.2** to the Council was completed in July 2025 with the following services transferring.

- Property and Estates
- Waste Contract Management
- Leisure Contract Management
- Projects and Project Management
- Human Resources Business Partner

**5.3** The assumption in the Q1 forecast is that the overall cost of Phase 2 remains within the £0.225m included as a provision in the revenue budget. However, it is expected that the in-year cost will be lower than the budgeted amount due to a number of



vacancies transferring to the Council. An updated forecast with analysis of variations will be included in the 2026/27 Budget Strategy and MTFs Update report to Cabinet in October 2025 with further updates in the Financial Performance reports.

- 5.4** The current estimate for the Council's share of redundancy and pension strain costs for Phase 2 is within the amount set aside within the Financial Resilience reserve and Publica Review Reserve (£0.300m).

## **6. CAPITAL PROGRAMME**

- 6.1** Council approved the Capital Programme for 2025/26 at their meeting on 24 February 2025. The Capital Programme has been updated to reflect adjustments as set out in Table 8 below and was approved by Cabinet in July 2025.

The capital programme for 2025/26 is £4.592 with a total net spend at £0.501m as at 30 June 2025.

**Table 7 – Capital Programme budget reconciliation**

<b>Capital Programme Reconciliation</b>	<b>(£'000)</b>
Original Budget (Council, 24 February 2025)	4,027
Slippage from 2024/25(Cabinet 10 July 2025)	565
<b>Latest Budget</b>	<b>4,592</b>



**Table 8 – Capital Programme Outturn Forecast**

Capital Programme	2025/26 OB (£'000)	Slippage From 2024/25 (£'000)	2025/26 LAB (£'000)	2025/26 Actuals to Q1 (£'000)	2025/26 Outturn (£'000)	2025/26 Outturn Variance (£'000)
Leisure & Communities	0	64	64	20	64	0
Housing/Planning and Strategic Housing	1,718	127	1,845	353	1,600	(245)
Environment	1,132	202	1,334	97	1,259	(75)
Retained & Corporate	0	0	0	0	0	0
ICT, Change and Customer Services	350	0	350	0	350	0
UK Rural Prosperity Fund	0	0	0	0	0	0
UK Shared Prosperity Fund Projects	327	0	327	31	327	0
Land, Legal and Property	500	172	672	0	672	0
Transformation and Investment	0	0	0	0	0	0
<b>TOTAL Capital Programme</b>	<b>4,027</b>	<b>565</b>	<b>4,592</b>	<b>501</b>	<b>4,272</b>	<b>(320)</b>

**6.2** The outturn forecast for the current year is an underspend of £0.320m. **Annex A** sets out the detailed forecast outturn with commentary from budget holders and is summarised in table 9 above.

**6.3** The significant variations forecast on the Capital Programme are:

- **Private Sector Housing Renewal (Disabled Facilities Grant)** - Estimated that the annual expenditure will be approximately £1.6m resulting in an underspend of £0.175m.
- **Bromford Joint Venture - (£0.070m)** Planning consent was granted on the 12 March, However Bromford need to resolve issues around drainage which is delaying the commencement of the work. This may delay commencement of works until 2027 unless Thames Water will bring their upgrade plans forward.
- **Replacement/Upgrade of Pay and Display Machines** – Although the tendering process for a new supplier has commenced. Installation not expected until 2026/27 (£0.125m)
- **Public Conveniences** – Accelerated rollout of payment devices including new doors at West Street (Tetbury), Chipping Campden, Lechlade, Northleach, and replacement paddle gates at the two facilities in Bourton-on-the-Water (Rissington Road and Church Rooms). Additional spend will be funded from capital receipts.

**6.4** At their meeting on 31 October 2023 Overview and Scrutiny Committee recommended that the Capital Programme should be kept under review to ensure the revenue impact of capital expenditure and financing decisions were fully considered.



## Capital Receipts and Disposals

- 6.5** There have been two disposals of assets during the first quarter of the financial year, the former Visitor Information Centre at Bourton on the Water (£0.242m) and the Old Station, Cirencester (£0.080m). The sale of Memorial Cottages is scheduled to complete in Q2 generating capital receipts of £0.281m. Right to Buy (RTB) receipts of £0.032m have been received from Bromford Housing during Q1 in relation to housing stock sold previously owned by the Council.

**Table 9 – Capital Financing Forecast**

	2025/26 OB (£'000)	Slippage From 2024/25 (£'000)	2025/26 LAB (£'000)	2025/26 Outturn (£'000)	2025/26 Outturn Variance (£'000)
<b>Capital Financing Statement</b>					
Capital receipts	2,052	221	2,273	3,785	1,512
Capital Grants and Contributions	1,975	251	2,226	394	(1,832)
Earmarked Reserves	0	0	0	0	0
Revenue Contribution to Capital Outlay (RCCO)	0	0	0	0	0
Community Municipal Investments (CMI)	0	93	93	93	0
Prudential Borrowing	0	0	0	0	0
	<b>4,027</b>	<b>565</b>	<b>4,592</b>	<b>4,272</b>	<b>(320)</b>

- 6.6** The Capital Financing position set out in the table above will be reviewed by the s151 Officer as part of the financial year end closedown process as expenditure forecasts are updated to ensure a balanced use of capital resources and mitigation of current and future interest rates.

## 7. NON-TREASURY MANAGEMENT SUMMARY

- 7.1** The CIPFA Code was updated in 2021 and includes the new requirement, mandatory from 01 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.



## **Prudential Indicators**

**7.1.1.** The detailed Non-Treasury Management prudential indicators are included in **Annex B** with the commentary below providing members with a high-level summary.

- 7.2** Whilst there is no underlying need to borrow with the Capital Programme financed through internal resources and external grants and contributions, any additional capital expenditure proposed during the year will need to consider the availability and cost of capital financing. The mid-year Treasury Management report to Audit and Governance Committee will set out the wider impact on the Capital Financing Requirement.

## **8. RISKS AND UNCERTAINTIES**

- 8.1** The report outlines several risks and uncertainties around the wider economic environment and achieving the Street Service savings of £0.300m.
- 8.2** A further risk has been identified concerning the additional Development Management fees received in Q1 and the forecast for the financial year. With an increase in speculative applications, it is prudent to set aside 50% of any potential additional income against planning appeals.

## **9. CONCLUSIONS**

- 9.1** Members should note that whilst the outturn forecast is favourable there remain concerns around financial performance in certain service areas – particularly services where the Council's net revenue budget is dependent on income from fees and charges.
- 9.2** Income and expenditure budgets will continue to be monitored throughout the financial year. In some instances, income budgets for 2025/26 have been adjusted downward to reflect historic underachievement of income. However, this should not be seen as a desirable outcome – more that it recognises in setting the budget for the forthcoming financial year the estimates need to be robust in the context of current financial performance.





- 9.3** Heads of Service should take steps to identify management action(s) that will address underperformance and discuss these with the finance team and the relevant Director. Financial Performance Reports in 2025/26 will include options and recommendations for corrective action where underperformance against the budget has been identified, and options for improving financial performance even if the service is achieving income and expenditure targets.
- 9.4** Heads of Service should explain financial performance in the context of service performance and outcomes. There is a risk that aspects of service performance may be reported as on or above target, with little or no reference to financial performance.
- 9.5** The financial and service reporting framework will continue to be developed by Finance and the Business and Intelligence service. This will ensure performance reporting is aligned and will support the service leads to identify potential mitigations and resolutions to improve performance.
- 9.6** As set out in the CIPFA Financial Management Code, performance reporting is important for the Council to remain financially sustainable. Members must receive timely information on its financial and operational performance so that corporate priorities are delivered within budget. Early information about emerging risks to financial sustainability are key to ensuring the Council can take effective decisions and carefully consider an effective response.
- 9.7** The Council must ensure it can address the financial challenges arising from the Fair Funding review ("FF 2.0") and Local Government Reorganisation ("LGR") over the MTFS-period.
- 9.8** Oversight of the Vacancy Management process has been strengthened by the Corporate Leadership Team ("CLT"), with CLT authorisation required to fill a vacancy, either on a short-term or long-term basis. CLT have also reviewed the process for assessing requests for additional resources to ensure a single and consistent approach is taken to the development and appraisal of proposals and business cases.
- 9.9** As set out in paragraph 2.3 and Table ES1, the initial outturn forecast for the year is favourable with an increased surplus likely at the end of the financial year.



- 9.10** The revenue budget is likely to come under further pressure in 2026/27 and 2027/28 as the Council considers the impact from LGR and ensures services continue to be provided to residents as usual. There will be a demand on key staff to support the assessment of final proposal and plan for a new unitary structure in Gloucestershire, and implementation of the proposal from mid-2026 following the Government's decision.
- 9.11** It is expected that additional capacity will be needed to support the emerging Corporate Plan, ensure services continue to be provided to residents, and support LGR. Therefore, it is proposed to maximise the level of resources available over the next 2 years, any additional budget surplus or one-off benefit is transferred to earmarked reserves at year end, subject to the final outturn position:
- Transformation and Change
  - Capacity Building
- 9.12** The increase in major planning applications (and associated income from fees) for housing developments does bring additional risks. As a large number of these schemes are speculative, it is likely that a number will be refused permission and will therefore result in appeals. Given the scale of development, there is a high chance appeals are dealt with as informal hearings or inquiries which bring greater costs to the Council. Planning permission was recently refused for 54 dwellings in Lechlade, which is likely to result in an appeal submission in late 2025/early 2026.
- 9.13** It is proposed to hold 50% of the forecast additional income as a risk provision. This will have the effect of reducing the net variation during the financial year. Subject to the final outturn position for Development Management Fees remaining positive (i.e. income received in the year is above the budgeted level), it is also proposed that 50% of the variation is transferred to the Planning Appeals reserve.
- 9.14** This monitoring report presents an update on the Council's financial position. As the report sets out, an underspend of £0.097m is forecast for the financial year which will result in a transfer to the Transformation and Change Reserve at year end in order to fund capacity building in preparation for LGR.
- 9.15** Members should note that whilst the outturn forecast has improved, there remain concerns around financial performance in certain service areas – particularly services where the Council's net revenue budget is dependent on income from fees and



charges. The report has provided reference to mitigation or actions that will be discussed with service leads to address and agree management actions.

## **10. FINANCIAL IMPLICATIONS**

**10.1** The detailed financial implications are set out in the report.

## **11. LEGAL IMPLICATIONS**

**11.1** 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.

## **12. RISK ASSESSMENT**

**12.1** Section 8 of the report set out the material risks and uncertainties.

## **13. EQUALITIES IMPACT**

**13.1** None

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

**14.1** None

## **15. BACKGROUND PAPERS**

**15.1** None

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Annex A - Capital Programme 2025/26 - Q.1						
Capital Programme by Service Area	2025/26 Budget [Incl. 24/25 slippage] (£'000)	2025/26 Actuals to Q.1 (£'000)	2025/26 Variance to Q.1 (£'000)	2025/26 Committed Expenditure (£'000)	2025/26 Forecast Out-Turn Variance (£'000)	Commentary
<b>Leisure and Communities</b>						
Spa pool - Bourton Leisure Centre	34	10	(24)	24	0	Scheme progressing, there has been a slight delay due to the discovery of an underground leak. Exploratory works have been approved to locate and repair the leak. Once the leak is fixed, the spa pool installation will continue as planned.
Crowdfund Cotswold	30	10	(20)	0	0	Expenditure to date is for funds being held by Cotswolds funding platform partner, Spacehive, for projects approved but not yet completed.
<b>Housing/Planning and Strategic Housing</b>						
Private Sector Housing Renewal Grant (DFG)	1,775	353	(1,422)	0	(175)	At Q.1 it is estimated that the annual expenditure will be approx. £1.6m. The initial impact of Gloucestershire County Council [GCC] using external occupational therapy [OT] agency to clear the waiting list for adaptations has settled. It is not anticipated that Cotswold will be in a waiting list situation again this financial year.
Bromford Joint Venture Partnership	70	0	(70)	0	(70)	Unlikely to be required in 2025/26 due to slippage on wider programme by Bromford.
<b>Environment</b>						
Waste & Recycling receptacles	82	36	(46)	0	0	Rolling budget for the purchase of waste receptacles due to growth in properties or replacements.
Provision for financing of Ubico Vehicles	790	19	(771)	280	0	This budget is to fund the Capital Fleet Replacement Programme for Ubico. It was approved during 2025/26 to also fund the installation of a vehicle ramp at Packers Leaze Depot, South Cerney. The installation was completed during Q.1. Procurement to replace 5 x 3.5 tonne cage vehicles is due to commence shortly.
Fuel Bunkering (Ubico)	60	0	(60)	0	0	The business case is being reviewed in light of Local Government Reorganisation [LGR]. Discussions with members and officers are ongoing around the feasibility of this project.
In cab technology (Street Cleaning)	60	0	(60)	0	0	

	2025/26 Budget [Incl. 24/25 slippage] (£'000)	2025/26 Actuals to Q.1 (£'000)	2025/26 Variance to Q.1 (£'000)	2025/26 Committed Expenditure (£'000)	2025/26 Forecast Out-Turn Variance (£'000)	
Capital Programme by Service Area						Commentary
On Street Residential Chargepoint Scheme (ORCS)	183	0	(183)	0	0	Electric Vehicle Charging Points have been installed in the Brewery Car Park, they have not yet been commissioned. It is expected that they will be fully operational during Q.2.
Public Toilets - Card Payment (bc)	34	42	(42)	42	50	Installation of payment mechanisms and new doors at West Street (Tetbury), Chipping Campden, Lechlade, Northleach, and replacement paddle gates at Rissington Road and Church Rooms expected in Q2.
Replace/Upgrade Pay and Display machines	125	0	(125)	0	(125)	The tendering process for a supplier of new equipment has commenced. Replacement/upgrade may slip into 2026/27.
<b>Retained and Corporate:</b>						
<b>ICT, Change and Customer Services</b>						
ICT Capital	150	0	(150)	0	0	Expenditure on networking equipment and the ongoing laptop replacement programme.
Planning Documents and Scanning Solution	200	0	(200)	0	0	Planning service and ICT are scoping improvements to the IDOX system as part of a wider service transformation agenda to focus on delivering service efficiencies through ICT. For the purposes of the Q1 report it is assumed the budget is fully committed.
<b>UK Prosperity schemes:</b>						
UK Shared Prosperity Fund Projects	327	31	(296)	296	0	The UKSPF funding is now fully committed following an open application process and is expected to be spent in full before the end of the financial year.
<b>Land, Legal and Property</b>						
Asset Management Strategy	672	0	(672)	0	0	Expenditure forecast in respect of Abberley House Roof and Leisure Centre lift.
	4,592	501	(4,141)	642	(320)	

## ANNEX B NON-TREASURY MANAGEMENT PRUDENTIAL INDICATORS

### ANNEX B: Non-Treasury Prudential Indicators

#### 1. BACKGROUND

- 1.1** 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

#### 2. CAPITAL EXPENDITURE

- 2.1** Cotswold District Council has undertaken and is planning capital expenditure as summarised below.

Capital Expenditure	2024/25 actual (£)	2025/26 forecast (£)	2026/27 budget (£)	2027/28 budget (£)
General Fund services	6,909,309	4,272,000	7,744,000	4,208,000
Capital investments	211,101	0	0	0

- 2.2** The main General Fund capital projects this year include expenditure in respect of Disabled Facilities Grants, purchase of Ubico Vehicles, expenditure on the council property portfolio.

#### 3. CAPITAL FINANCING REQUIREMENT

- 3.1** 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)	2024/25 actual (£)	2025/26 forecast (£)	2026/27 budget (£)	2027/28 budget (£)
General Fund services	360,000	470,000	2,970,000	2,570,000
Capital investments	0	0	0	0
<b>TOTAL CFR</b>	<b>360,000</b>	<b>470,000</b>	<b>2,970,000</b>	<b>2,570,000</b>

#### 4. GROSS DEBT AND THE CAPITAL FINANCING REQUIREMENT

- 4.1** 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.

## ANNEX B

### NON-TREASURY MANAGEMENT PRUDENTIAL INDICATORS

	31/03/2025 actual (£)	31/03/2026 forecast (£)	31/03/2027 budget (£)	31/03/2028 budget (£)	Debt at 30.6.2025 (£)
<b>Gross Debt and CFR</b>					
Debt (incl. PFI & leases)	260,000	160,000	5,000	2,730,000	260,000
Capital Financing Requirement	360,000	470,000	2,970,000	2,570,000	

## 5. DEBT AND THE AUTHORISED LIMIT AND OPERATIONAL BOUNDARY

- 5.1** 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 2025/26 (£)	Debt as at 30/06/2025 (£)	2025/26 Authorised Limit (£)	2025/26 Operational Boundary (£)	Complied? Yes/No
Borrowing	10,000,000	0	10,000,000	5,000,000	Yes
PFI and Finance Leases	0	0	0	0	Yes
<b>TOTAL Debt</b>	<b>10,000,000</b>	<b>0</b>	<b>10,000,000</b>	<b>5,000,000</b>	

- 5.2** 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.

## 6. NET INCOME FROM COMMERCIAL AND SERVICE INVESTMENTS TO NET REVENUE STREAM

- 6.1** 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.

	2024/25 actual (£)	2025/26 forecast (£)	2026/27 forecast (£)	2027/28 budget (£)
Total net income from service and commercial investments	237,992	406,505	434,229	440,206
Proportion of net revenue stream	1.42%	2.49%	3.10%	3.44%

## 7. PROPORTION OF FINANCING COST TO NET REVENUE STREAM

- 7.1** Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue.
- 7.2** 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 Rate, and general government grants.



**ANNEX B**  
**NON-TREASURY MANAGEMENT PRUDENTIAL INDICATORS**

	<b>2024/25 actual (£)</b>	<b>2025/26 forecast (£)</b>	<b>2026/27</b>	<b>2027/28</b>
Financing costs (£)	11,233	14,000	107,000	534,000
Proportion of net revenue stream	0.10%	0.09%	0.77%	4.17%

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