

Public Document Pack



COTSWOLD
District Council

Wednesday, 8 October 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, 16 October 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.

Cotswold District Council, Trinity Road, Cirencester, Gloucestershire, GL7 1PX
Tel: 01285 623000 www.cotswold.gov.uk

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 - 18)

To approve the minutes of the previous meeting held on 4 September 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** (Pages 19 - 22)

To note the decisions taken by the Leader and/or Individual Cabinet Members since the agenda for Cabinet 4 September 2025 was published. The following non-key decisions have been taken by individual Cabinet Members under delegated authority:

1. Cabinet Member for Finance - Decision meeting 6 October 2025

Decisions taken regarding:

- a) The allocation of funds collected from the Rissington Road Car Parking Tourism Levy in Bourton-on-the-Water for 2025/26.
- b) The determination of ten new applications and thirteen renewal applications for Discretionary Rate Relief submitted under Section 47 of the Local Government Finance Act 1988 for the financial years 2023/2024, 2024/2025 and 2025/2026

Date decisions effective: 15 October 2025.

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. **Safeguarding Policy Update - July 2025** (Pages 23 - 54)

Purpose:

To inform Members of the updated Safeguarding Policy and Procedures.

Recommendation(s):

That Cabinet resolves to:

1. Agree and adopt the updated Safeguarding Policy and Procedures.

10. **Council Tax Support Scheme 2026/2027** (Pages 55 - 68)

Purpose:

To consider and recommend to Full Council the revised Council Tax Support Scheme for the financial year 2026/2027.

Recommendations:

That Cabinet recommends to Full Council to:

1. Agree the increase to income bands as detailed within paragraphs 3.2, 3.3 and Annex A of this report from 1 April 2026. Delegate authority to the Deputy Chief Executive and Section 151 Officer, in Consultation with the Cabinet Member for Finance, to amend the income bands by the September 2025 CPI rate due to be published on 22 October 2025, should this be different to the assumed increase set out in the report and annex A.
2. Agree that any balance remaining in the earmarked reserve 'Hardship Fund' be made available in 2026/27 financial year for reasons detailed in paragraphs 3.6 and 3.7 of this report.

11. **Cotswold District Local Plan (2011-31) Regulation 18 Consultation** (Pages 69 - 132)

Purpose:

To seek approval to consult on the Preferred Options for development in the Cotswold District for the Regulation 18 consultation, and further technical documents as and when necessary; and to approve the updated Local Development Scheme to progress the Plan to submission in winter 2026 and adoption in winter 2027.

Recommendation(s):

That Cabinet resolves to:

1. Approve the Cotswold District Council Local Plan Review Regulation 18 Consultation Preferred Options (November 2025) document and commence a six-week public consultation on this and a call for sites from 5 November 2025 to 18 December 2025.
2. Delegate authority to the Director of Communities and Place, the Accountable Officer and the Cabinet Member for Housing and Planning to agree any minor amendments or additions to the Consultation Document prior to the Regulation 18 Consultation.
3. Delegate authority to the Director of Communities and Place and the

Cabinet Member for Housing and Planning to approve for consultation any supporting technical documents for the Regulation 18 consultation.

4. Delegate authority to the Director of Communities and Place and the Cabinet Member for Housing and Planning to approve additional technical documents for further Regulation 18 consultation as and when necessary.
5. Approve the Local Development Scheme.

12. **Budget Strategy and Medium Term Financial Strategy Update** (Pages 133 - 202)

Purpose:

To set out the Budget Strategy to support the preparation of the 2026/27 revenue and capital budgets and present an updated Medium Term Financial Strategy forecast.

Recommendation(s):

That Cabinet resolves to:

1. Approve the 2026/27 Budget Strategy as outlined in the report.

13. **Next Meeting Date**

The next meeting of Cabinet is scheduled for 20 November 2025 at 6.00pm.

(END)

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Minutes of a meeting of Cabinet held on Thursday, 4 September 2025

Members present:

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

Officers present:

Matt Abbott, Head of Communications	Gemma Moreing, Business Information Lead
Angela Claridge, Director of Governance and Development (Monitoring Officer)	Jane Portman, Interim CEO
Caroline Clissold, Business Manager for Housing and Resident Services	David Stanley, Deputy Chief Executive and Chief Finance Officer
Nickie Mackenzie-Daste, Senior Democratic Services Officer	Kira Thompson, Election and Democratic Services Support Assistant
Helen Martin, Director of Communities and Place	Joseph Walker, Head of Economic Development and Communities
Philip Measures, Service Lead Environmental Health - Food Safety & Licensing	

Observers:

Councillor Gina Blomefield

118 Apologies

There were no apologies for absence.

119 Declarations of Interest

Councillor Andrea Pellegram declared an interest in respect of Agenda item 10 and agreed to leave the Chamber for the duration of the item and the vote on that item.

120 Minutes

The purpose of this item was to consider the minutes of the Cabinet meeting held on 10 July 2025. There were no amendments to the minutes

Approval of the minutes was proposed by Councillor Paul Hodgkinson, Cabinet Member for Health, Culture and Visitor Experience, and seconded by Councillor Layton, Cabinet Member for Housing and Planning.
The proposal was put to the vote and agreed by Cabinet.

Voting record:

6 For, 0 Against, 2 Abstentions.

To approve the minutes of Cabinet 10 July 2025 (Resolution)		
RESOLVED that the minutes of the meeting of the Cabinet held on 10 July 2025 be approved as a correct record.		
For	Patrick Coleman, Mike Evemy, Paul Hodgkinson, Juliet Layton, Andrea Pellegram and Tristan Wilkinson	6
Against	None	0
Conflict Of Interests	None	0
Abstain	Claire Bloomer and Mike McKeown	2
Carried		

121 Leader's Announcements

The Leader congratulated all involved in the Phoenix Festival, noting it had been well supported by the Town Council and Crowdfund Cotswolds, and was a successful and well-attended community event.

122 Public Questions

No public questions were received.

123 Member Questions

No member questions were received.

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

No decisions had been taken by the Leader or Cabinet Members since the previous Cabinet meeting; therefore, there were no items to report.

125 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, who introduced the recommendation from the Overview and Scrutiny Committee on 1 September 2025 which asked that consideration be given to putting local social and /or archaeological artefacts on public display at the Council's offices, including artefacts related to the history of local government in the area.

Cabinet discussed the recommendation and Councillor Paul Hodgkinson, Cabinet Member for Health, Culture and Visitor Experience, advised that the Council's Leisure and Culture Manager would explore with the Museum operator, Freedom Leisure, opportunities to improve public access to the Museum's extensive collection.

126 Preventing Homelessness Strategy 2025-2030

Councillor Juliet Layton, Cabinet Member for Housing and Planning introduced the report and presented the new Preventing Homelessness Strategy 2025 -2030 produced to comply with requirements of the Homelessness Act 2002 and the Homelessness Reduction Act 2017.

The strategy set out key priorities focused on shifting from reactive to preventative approaches.

It was noted that homelessness in the Cotswolds had risen by 30% since 2020, despite progress in maintaining low levels of rough sleeping, delivering 458 affordable homes, and preventing homelessness for over 200 households in the past year.

The report highlighted pressures from high housing costs (average £440,000 for a home; around £1,000 per month for a two-bed rental) and increasing demand. The Council received £369,227 in Homelessness Prevention Grant funding for 2025–26, with 49% ring-fenced for prevention, relief and staffing.

Members noted that the annual ring-fenced Homelessness Prevention Grant supported this duty, with key outcomes to prevent single homelessness and rough sleeping, reduce family use of unsuitable temporary accommodation, and eliminate B&B placements beyond six weeks.

The strategy and action plan had been reviewed by the Overview and Scrutiny Committee in May and no formal recommendations had been raised. The Committee had indicated broad support for the strategy.

Councillor Paul Hodgkinson, Cabinet Member for Health, Culture and Visitor Experience, noted the strategy's mention of vulnerable groups, including those experiencing domestic abuse and veterans, the report author reported that very few veterans presented as homeless in the Cotswold District Council area and currently none were recorded, though some occasionally appear on the waiting list.

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Cabinet Members expressed their thanks to all the officers involved for their excellent work.

The recommendations were proposed by Councillor Juliet Layton and seconded by Councillor Claire Bloomer.

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

Voting Record:

8 For, 0 Against, 0 Abstentions.

To Approve the implementation of the Preventing Homelessness Strategy 2025-2030 with immediate effect (Resolution)		
RESOLVED that Cabinet Approved the implementation of the Preventing Homelessness Strategy 2025-2030 with immediate effect.		
For	Claire Bloomer, Patrick Coleman, Mike Evemy, Paul Hodgkinson, Juliet Layton, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	8
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
Carried		

127 Private Sector Housing Civil Penalties Policy and HMO Amenity Standards

Councillor Andrea Pellegram, Cabinet Member for Environment and Regulatory Services left the Chamber having declared an interest at the start of the meeting.

Councillor Mike Evemy, Leader of the Council, introduced the report which covered a review and update of both the Civil Penalties Enforcement Policy and the Houses in Multiple Occupation (HMO) Amenity Standards policy taking into account legislative changes and new guidance from tribunal decisions.

Civil Penalties Policy

This policy was required to be in place in order to retain the option of serving a civil penalty for a housing offence, as an alternative to prosecution. Officers would continue to conduct their work in accordance with the Corporate Enforcement Policy, with the informal approach to resolution usually being the starting point. Proposed fines ranged from £500 to £30,000, depending on the seriousness of the offence(s). The forthcoming Renters Rights Bill was expected to require councils to use Civil Penalties, and their scope was being broadened to include harassment and illegal eviction. It was therefore considered important to have a robust and up-to-date policy in place.

The Policy had been developed nationally by Justice for Tenants, and a methodology

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had been provided for the calculation of fines together with a step-by-step procedure. This would ensure that good decisions were made and that they could be properly defended if appealed at Tribunal. The final decisions on fines would be made by the Head of Legal Services in consultation with the Business Manager for Environmental, Welfare and Revenue Services. The policy would be updated from time to time, although any significant changes to the Policy would be referred to the portfolio holder and brought to Cabinet.

HMO Amenity Standards

It was noted that this policy applied to the inspection of all HMOs, not only those that were licensed. The policy was designed to provide guidance to officers, landlords and tenants and had been updated to reflect the change in definition of a licensable HMO.

It was noted that landlords were always given an opportunity to remedy issues before penalties or prosecution, with mitigating and aggravating factors taken into account. Complaints were mainly tenant-led, though proactive inspections were carried out on licensable HMOs.

The recommendations were proposed by Councillor Mike Every and seconded by Councillor Tristan Wilkinson.

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

Voting Record:

7 For, 0 Against, 0 Abstentions.

Councillor Andrea Pellegram did not vote having declared an interest.

To approve the Policy for Civil Penalties and the HMO Amenity Standards Policies and delegate authority for revisions to the Civil Penalties Policy (Resolution)		
RESOLVED that Cabinet:		
1. Approved 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. Approved the HMO Amenity Standards Policy		
3. Delegated 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.		
For	Claire Bloomer, Patrick Coleman, Mike Every, Paul Hodgkinson, Juliet Layton, Mike McKeown and Tristan Wilkinson	7
Against	None	0
Conflict Of Interests	Andrea Pellegram	1
Abstain	None	0
Carried		

128 Corporate Plan 2025-2028 refresh

The purpose of the report was to seek Cabinet's endorsement of a refreshed Corporate Plan for the period 2025 through to 2028. The refreshed Corporate Plan reflected significant national and local changes since last year's agreement on the extant Corporate Plan. The previous update had been agreed in January 2024, but a further refresh was required following the Government's announcement on local government reorganisation and the potential abolition of the authority on 1 April 2028. Cabinet emphasised the importance of producing a more succinct plan, removing actions already achieved, and focusing on priorities to be delivered before reorganisation.

Councillor Mike Evemy, Leader of the Council, introduced the item. Cabinet considered the refreshed Corporate Plan, introduced by the Leader and presented by the report author. It was noted that the report had been subject to scrutiny by the Overview and Scrutiny Committee on 1 September 2025.

Key changes to the extant plan included the introduction of a new priority, preparing for the future, which was linked to LGR, and the embedding of the Local Plan across all six existing priorities. It was confirmed that the final plan would combine the text and action plan into a single designed document, with photographs and member contributions to make it more accessible and engaging. Members would be consulted individually on attributed quotes before publication.

During discussion, members commended the clarity and accessibility of the document and welcomed the incorporation of Cabinet Members' top three priorities. Minor drafting amendments were suggested. Members highlighted the importance of climate action, including fleet renewal, and the need to hand over a "clean council" to the successor unitary authority. The aspiration to prepare for the future and to build a lasting legacy for the Cotswolds was strongly supported. Members also noted that financial sustainability had been taken into account in preparing the plan.

Cabinet resolved to recommend the Corporate Plan 2025–2028 to Council on 24 September 2025, subject to modifications to member quotes and minor drafting amendments, and delegated authority to the Chief Executive, in consultation with the Leader, to finalise the design.

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

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

Voting Record:

8 For, 0 Against, 0 Abstentions.

To approve recommendations - Corporate Plan 2025-2028 (Resolution)		
RESOLVED that Cabinet :		
<ol style="list-style-type: none"> 1. Agreed to recommend to Full Council to adopt the Plan, subject to modifications of Councillors attributed quotes. 2. Delegated authority to the Chief Executive Officer, in consultation with Leader, to finalise the design. 		
For	Claire Bloomer, Patrick Coleman, Mike Evemy, Paul Hodgkinson, Juliet Layton, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	8
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
Carried		

129 Service Performance Report 2025-26 Quarter 1

The purpose of the report was to provide an update on progress on the Council's priorities and service performance Q1 (April to June 2025).

Councillor Mike Evemy, Leader of the Council, introduced the item, which was for noting.

Cabinet considered the Service Performance Report for Quarter 1 (April–June 2025), which had also been reviewed by the Overview and Scrutiny Committee. The report highlighted key achievements, including the successful transition of staff back from Publica on 1 July 2025, delivery of the Parish and Town Council Summit in June with over 100 attendees, and continued success of the Crowdfund Cotswold initiative.

Performance data showed strong results in several areas, including non-domestic rates collection ahead of target, planning applications determined within timescales, and a reduction in missed bin collections to below target for the first time in over a year. Leisure centre visits had increased significantly, and gym memberships were broadly on target. Areas for improvement included planning appeals, where outcomes varied depending on committee and officer recommendations, and affordable housing delivery, which had achieved two completions in the quarter.

Officers confirmed minor amendments to the report, including updated information on biodiversity work at Cotswold Lakes and a correction to a chart legend.

Positive comments were made on the clarity of the report, the importance of improving affordable housing delivery, and the need to monitor planning appeals and enforcement more closely. Members also noted the value of cross-team working, improvements in climate action, waste management, food premises inspections, and

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the successful media campaign on fly-tipping. Metrics for planning enforcement were agreed to be included in future reporting.

Thanks and congratulations were extended to officers for their work across a wide range of service areas, with particular recognition of progress on climate change, waste management, planning performance, and the support provided to residents through initiatives such as the Low-Income Family Tracker.

Councillor Blomefield, Chair of the Overview and Scrutiny Committee, was invited to make any comments around the report resulting from the Committee meeting on 1 September 2025. There were no formal recommendations, however key points highlighted included:

- Planning enforcement, which would be considered at the November meeting.
- The value of the retrofit officer was emphasised, with concern that her contract was due to end in September; continuation of the role was encouraged if funding allowed.
- Improvements in the Council's relationship with Ubico were welcomed.
- The importance of promoting wider awareness of the Low-Income Family Tracker was highlighted.
- Adequacy of electric vehicle charging points was to be reviewed.
- Monitoring of planning applications, including solar installations, was suggested and a greater uptake of renewable energy was encouraged

Members noted that the first meeting of the Moreton-in-Marsh Working Group was scheduled for the following week, with a wider meeting planned for later in September or early October, in line with the Local Plan timetable.

Cabinet noted that solar installations generally did not require planning permission except for listed buildings, and that monitoring could be explored using digital tools to identify trends and improve data collection.

Waste management pressures from increased takeaway outlets in Bourton-on-the-Water were discussed, including overflowing bins, and Cabinet recognised the need to review wider tourism and litter management outside the peak season.

Members noted that waste vehicles were under detailed review, with replacement options to be considered, requiring robust decisions balancing climate commitments, finances, in the context of upcoming Local Government Reorganisation. It was also noted that any proposals would need full Council approval.

RESOLVED that Cabinet

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

130 People and Culture Strategy

The purpose of the reports was to seek Cabinet's approval of the People & Culture Strategy (Annex A) and the accompanying Year 1 implementation plan (Annex B).

Councillor Mike Every. Leader of the Council, introduced the People and Culture Strategy 2025–28 report, which had been developed following the first phase of staff returning from Publica in November 2024. The strategy groundwork had been carried out by Innovation Central, aimed to align and develop the workforce alongside organisational priorities, establish workforce values, and provide a behavioural framework to support positive and productive work environments. Staff engagement and consultation had informed the strategy and its associated year one implementation plan. Now, additional consideration was also being given to forthcoming Local Government Reorganisation.

The strategy incorporated four core workforce values which were also key to the Corporate Plan:

- putting communities first,
- working as one team,
- being business-focused, and
- being set up for success to deliver corporate priorities.

The internal communications and engagement strategy was also noted as being an important part of the strategy..

Members raised the following points:

- The importance of supporting and retaining staff during the period of uncertainty and ensuring high performance and accountability.
- The creation of psychological safety to maintain engagement and motivation.
- Recognition of the Council's menopause policy and the promotion of staff wellbeing initiatives.
- The success of recent local job fairs and the importance of inclusive recruitment criteria.
- Positive changes in workplace culture, with emphasis on collaboration, staff value, and resilience.
- Consideration of KPIs and objectives to monitor progress, and potential for sharing aspects of the strategy with other councils.
- The role of internal communications in supporting the strategy and engagement across the workforce.

Cabinet welcomed the strategy, noting its timeliness and importance in preparing the workforce for future organisational changes.

The recommendations were proposed by Councillor Mike Every and seconded by Councillor Andrea Pellegram.

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

Voting Record:

8 For, 0 Against, 0 Abstentions.

To approve the People and Culture Strategy 2025-2028 and the implementation and engagement strategies. (Resolution)

RESOLVED that Cabinet:

1. Approved the People & Culture Strategy as detailed in Annex A
2. Approved the four core workforce values:
 - a. We put our communities first:
 - b. We are one team: working for our residents and businesses
 - c. We are business focussed: ensuring efficiency, effectiveness and good value for money
 - d. We are set up for success: to deliver against our corporate priorities
3. Approved the year 1 implementation plan as detailed in Annex B (September 2025 – August 2026)
4. Noted the Internal Communications & Engagement Strategy as detailed in Annex C.

For	Claire Bloomer, Patrick Coleman, Mike Every, Paul Hodgkinson, Juliet Layton, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	8
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
Carried		

131 Financial Performance Report 2025-26 Quarter 1

The purpose of the report was to present the first 2025/26 budget monitoring position to Cabinet and seek Cabinet's endorsement of the proposed financial management approach and related reserve transfers.

Councillor Patrick Coleman, Cabinet Member for Finance, introduced the report and highlighted the early agreement of the July pay award, which provided certainty for staff and finance teams, the implementation of a vacancy management process, the creation of earmarked reserves for transformation and capacity building, and the establishment of a planning appeals reserve to manage financial risks from increased housing targets and speculative development applications.

Members raised the following points:

- Vacancy management was recognised as an efficient process to ensure the right staff were in the right roles, while allowing for the appropriate use of agency staff where necessary, and to balance staffing requirements with budgetary savings.
- A shortfall in cemetery income was noted and was under review to understand its causes.
- Interest rates for funds were requested in percentage terms to improve clarity on financial performance and support effective budget management.

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- Income from public conveniences, following the introduction of charging at all but one site, was expected to reach the annual target of £100,000 in quarter two, with members noting previous underachievement of approximately £40,000 per year.
- Surpluses above budget were to be held in earmarked reserves to support transformation initiatives, capacity building, and strategic planning.
- Planning fee income and the anticipated increase in planning appeals were highlighted as requiring careful monitoring to ensure appropriate financial provision.
- Replacement and upgrade of car park payment machines was noted, with installation expected in the next financial year; members highlighted the importance of modernising payment systems to improve efficiency.
- Expanding parking payment options to include multiple apps was suggested to enhance visitor convenience.

The Chair of Overview and Scrutiny, Gina Blomefield, welcomed the vacancy management process, emphasising its potential to improve efficiency and ensure the right staff were deployed. She also highlighted the need for clarification of cemetery income shortfalls and requested that interest rates be reported in percentages to aid understanding.

Action Deputy Chief Executive to ensure that percentage interest rates were made available.

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

The proposal was put to the vote and agreed by Cabinet

Voting Record:

8 For, 0 Against, 0 Abstentions.

To endorse the proposed financial management approach and related reserve transfers (Resolution)

RESOLVED that Cabinet:

1. Noted the financial position set out in the report.
2. Endorsed the approach to financial management for 2025/26 as set out in paragraph 4.8 of the report.
3. Endorsed 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. Endorsed the principle of the transfer of 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.

For	Claire Bloomer, Patrick Coleman, Mike Evemy, Paul Hodgkinson, Juliet Layton, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	8
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Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
Carried		

132 Next Meeting

The next scheduled meeting of Cabinet is on 16 October 2025, and will start at 6.00pm.

The Meeting commenced at 6.00 pm and closed at 7.42 pm

(END)



Cabinet – 16 October 2025 2025

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

Note:

- Any decision that is still subject to call-in by the Overview and Scrutiny Committee is marked with the expiry date of call-in at the standard close of business time of 5pm.
- Further information on the decision taken and the webcast link can be found within the hyperlink for each 'subject'.
- Decisions below are those taken after the publication of the Cabinet agenda on 30.04.2025.

Cabinet Member/ Officer	Meeting date	Subject	Decision(s)
Cabinet Member for Finance	06/10/2025	The allocation of funds collected from the Rissington Road Car Parking Tourism Levy in Bourton-on-the-Water for 2025/26.	<p>The Cabinet Member for Finance considered the recommendations within the report and noted to approve the recommendations in the interests of economic community success.</p> <p>The Cabinet Member resolved to approve the funding of the following Projects, listed in order of preference resulting from the 2025 public consultation process in relation to the use of funds from the Bourton-on-the-Water Tourism Parking Levy:</p> <ol style="list-style-type: none">1. Commissioning of a Visitor Traffic Management Strategy (estimated cost £35,000),2. Installation of rubber matting for the Melville and Naight play areas (estimated cost £860),



		<ol style="list-style-type: none">3. Provision of additional Parking Enforcement between Christmas and New Year (estimated cost £530),4. Set up and removal of Village Green railings for protection of the Green from November to March (estimated cost £900),5. Engineering works on the footpath adjacent to Jubilee Orchard, to improve drainage (estimated cost £8,000),6. Repainting of the benches in the Village centre (estimated cost £4,000),7. Repair of the paths around the Village Green (estimated cost £5,000),8. Resurfacing of the bonded area underneath circular benches on the Village Green (estimated cost £7,500), and9. Purchase of materials for volunteers to use to make gravel footpath improvements; particularly the Conigers and Manor Field footpaths (estimated cost £3,000). <p>The Cabinet Member for Finance approved the funding of the recurring annual expenditure from the Bourton-on-the-Water 2025/26 Tourism Parking Levy receipts:</p> <ol style="list-style-type: none">10. The cost of employing the Village Warden (£20,444),11. The cost of providing the Village Warden with a Small Projects budget (£500),12. Joint (50%) funding of the annual refresh of the Village Green (£9,957), and
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			<p>Joint (50%) funding of the provision of additional Parking Enforcement (£8,832).</p> <p><u>Effective from 15/10/2025.</u></p> <p>https://meetings.cotswold.gov.uk/ieListDocuments.aspx?Mid=2564</p>
Cabinet Member for Finance	06/10/2025	<p>To determine ten new applications and thirteen renewal applications for Discretionary Rate Relief submitted under Section 47 of the Local Government Finance Act 1988 for the financial years 2023/2024, 2024/2025 and 2025/2026</p>	<p>The Cabinet Member for Finance considered the recommendations within the report and agreed the Discretionary Rate Relief to support those charitable organisations where the entities were carrying out activities which either support the Council's priorities or have provided evidence of financial circumstances which met the criteria. Where refusal was given the reserves were sufficient to meet the financial performance.</p> <p>The Cabinet Member for Finance approved the following Discretionary Rate Relief applications for:</p> <ol style="list-style-type: none">1. Big Yellow Bus Company2. North Cotswold Food Bank3. Heart Safe Clinic Academy (six accounts)4. Palmer Hall Management5. Churn Project Ltd6. Headspace7. Cirencester Opportunity Group8. SLM Community Leisure Charity Trust (three accounts)9. New Brewery Arts (two accounts)



			<p>10. Brimpsfield Village Hall 11. Cirencester Citizens Advice 12. Bourton-on-the-Hill Old School Village Hall 13. Lechlade Library Ltd The Cabinet Member for Finance refused applications for: 14. The Cotswolds Canals Trust 15. Didmarton Village Hall & Community Committee</p> <p>Effective from 15/10/2025. https://meetings.cotswold.gov.uk/ieListDocuments.aspx?MIId=2564</p>
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Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET – 16 OCTOBER 2025
Subject	SAFEGUARDING POLICY UPDATE JULY 2025
Wards affected	All
Accountable member	Councillor Claire Bloomer, Cabinet Member for Communities Email: claire.bloomer@cotswold.gov.uk
Accountable officer	Claire Locke, Executive Director, Publica Email: claire.locke@publicagroup.uk Susan Hughes, Business Manager Support and Advice and Designated Safeguarding Lead Email: susan.hughes@publicagroup.uk
Report author	Paula Massey, Enabling Manager and Deputy Designated Safeguarding Lead Email: paula.massey@publicagroup.uk
Summary/Purpose	To inform Members of the updated Safeguarding Policy and Procedures.
Annexes	Annex A - Safeguarding Policy and Procedures Annex B - Equality Impact Assessment
Recommendation(s)	That Cabinet resolves to: 1. Agree and adopt the updated Safeguarding Policy and Procedures.
Corporate priorities	<ul style="list-style-type: none"> Supporting Communities
Key Decision	NO
Exempt	NO
Consultees/	Cotswold District Council Senior Leadership Team.



Consultation	<p>Publica Executive Leadership Team.</p> <p>No wider consultation as this is an update to the Cabinet approved policy 12 November 2020.</p>
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1. EXECUTIVE SUMMARY

- 1.1** The Care Act (2014) places a duty on local authorities to:
- 1.2** Consider people's wellbeing when making decisions around care and support.
- 1.3** Provide services or take steps towards preventing, delaying or reducing the needs for care and support.
- 1.4** Providing information and advice on services available locally.
- 1.5** In October 2020 the Cotswold District Council Cabinet approved the implementation of Safeguarding Policy and Procedures.
- 1.6** This updated policy consolidates changes to referral processes and clarifies key responsibilities, ensuring the Council continues to meet its statutory duty of care.

2. BACKGROUND

- 2.1** Cotswold District Council is committed to safeguarding, which primarily involves protecting adults at risk, young people, and children from harm, abuse, or neglect. This commitment also extends to early intervention, promoting health and wellbeing, and upholding human rights. In collaboration with partner agencies, the Council aims to reduce the risk of abuse or neglect and ensure that individuals' views, wishes, feelings, and beliefs are central to any decisions made. Promoting individual wellbeing remains a core priority throughout all safeguarding actions.
- 2.2** Cotswold District Council delivers a range of services that directly impact the lives of adults, young people, and children. Employees, elected members, contractors, and volunteers often work closely with individuals who may be at risk, placing the Council in a key position to safeguard and promote adult welfare. Services such as Licensing, Benefits, Planning, Environmental Health, Strategic Housing, Homelessness, Enforcement, Community Safety, Leisure Management, and Customer Services all play a role in this responsibility. Where appropriate and within legal parameters, the Council is required to share information with partner agencies to protect adults at risk of harm.
- 2.3** The Safeguarding Policy outlines the Council's roles, aims, and responsibilities. Through training and increased awareness, they equip employees and members to take proactive and informed action when concerns arise regarding an adult, young person or child's safety or wellbeing.



3. MAIN POINTS

- 3.1** As a second-tier authority, the Council has a statutory responsibility and duty of care to report safeguarding concerns to the appropriate authorities and agencies.
- 3.2** Cotswold District Council is a member of the Gloucestershire Safeguarding Adults Board (GSAB) and the Gloucestershire Safeguarding Children's Partnership (GSCP).
- 3.3** Key data relating to cases:
- Rising safeguarding activity in 2023–2024
 - 11 cases during financial year 2024-2025
 - 5 cases this financial year as at 19.09.25
 - Mental Health & Suicide Ideation: Most frequent category
- 3.4** By implementing this Policy, the Council establishes a corporate-wide approach to safeguarding that applies across all services, providing clear strategic direction and defined lines of accountability.
- 3.5** A similar Policy will be adopted for Publica Group Ltd to ensure its officers support the Council's duties in respect of safeguarding at risk groups.

Internal consultation and engagement will be undertaken as necessary to ensure the effective implementation and delivery of this Policy.

4. ALTERNATIVE OPTIONS

- 4.1** The Council could decide not to review the current Safeguarding policy. However, this is not good practice as the guidance has changed, and the Policy should therefore be updated to reflect this.

5. FINANCIAL IMPLICATIONS

- 5.1** The current resourcing of the safeguarding function requires a review to ensure that all statutory responsibilities of the Councils are being effectively met. Subject to the outcome of this review and discussions with Councils, there may be a need to consider additional staffing resources to strengthen the safeguarding function and ensure continued compliance and effectiveness.
- 5.2** There will be a requirement to deliver ongoing training and awareness which could have financial implications, it is anticipated that this can be managed within the existing training budget allocation.



6. LEGAL IMPLICATIONS

- 6.1** The Children Act 2004; the Care Act 2014 and the Safeguarding Vulnerable Groups Act 2006 place duties on the Council to ensure its functions are discharged having regard to the need to safeguard and promote the welfare of children and young people and adults at risk.
- 6.2** The Council requires up to date policies to support its actions and avoid legal challenges.

7. RISK ASSESSMENT

- 7.1** The Council has a duty of care towards adults at risk, children, and young people who participate in its activities or access its services. It recognises that all adults at risk, young people and children have the right to be safe and protected from harm. Without a safeguarding policy and appropriate staff training, there is an increased risk of harm to individuals and potential reputational damage to the Council.

8. EQUALITIES IMPACT

- 8.1** An equality impact assessment has been completed and is attached as Annex B to this report.

9. CLIMATE, BIODIVERSITY, AND ECOLOGICAL EMERGENCIES IMPLICATIONS

- 9.1** None.

(END)

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COTSWOLD
District Council

Safeguarding Policy and Procedures



Safeguarding is Everyone's Concern

CONTENTS

- 1. Introduction**
- 2. Background and Aims**
- 3. Definitions and Types of Abuse**
- 4. Governance**
- 5. Responsibilities**
- 6. Training**
- 7. How To Report A Concern**
- 8. What Happens Next**

Versions

Document Control	Date	Author
Version 1	21.10.2020	Enabling Manager
Version 2	18.09.2025	Enabling Manager, Deputy Designated Safeguarding Lead

Documents of influence:

Ref No	Acts and Policies of Influence	Date of Issue
	Legal Framework	
	Children Act 1989 and 2004 and Working Together to Safeguard Children 2023	
	Care Act 2014	
	Mental Capacity Act 2005	
	Partners	
	Gloucestershire Safeguarding Adults Board	
	Gloucestershire Safeguarding Children Partnership	
	Associated Acts	
	Domestic Abuse Act 2021	
	Crime and Disorder Act 1998	
	Police, Crime, Sentencing and Courts Act 2022	
	Modern Slavery Act 2015	
	UK Data Protection Legislation	
	Prevent Duty	
	Policies	
	Suicide Prevention Guidance	October 2024
	Whistle-Blowing Policy	January 2022
	Anti-Harassment and Bullying Policy and Procedure	September 2023
	Recruitment Policy and Procedure	February 2024

1. Introduction

Safeguarding refers to measures and practices put in place to protect adults at risk, young people and children from harm, abuse or neglect. More widely it is about early prevention, health, wellbeing and human rights.

The purpose of the policy and procedures are to ensure that Cotswold District Council, (the Council) are aware of their legal obligations to meet their responsibilities in safeguarding adults at risk, young people and children with a consistent approach.

This guide applies to employees, elected members, casual workers, volunteers, contractors and partners delivering services on behalf of the organisation.

2. Background and Aims

Safeguarding does not operate in isolation; its relevance is important to all services and has direct links to other policies, see the table above for Documents of Influence. This policy will raise awareness of safeguarding and what to do if there are suspicions that abuse is taking place.

The Council advocates that SAFEGUARDING IS EVERYONE'S BUSINESS and that all people have the right to live in safety, free from abuse, harm and neglect.

The Council aims to create an environment where employees, elected members, volunteers and contractors are aware of their obligations and are adequately trained and encouraged to think of safeguarding as being part of their responsibility, understanding the need for them to take a full and active part in the prevention and response to safeguarding.

The Policy aims to ensure:

- Protection for adults at risk, young people and children while using services that the Council are responsible for, whether directly delivered or commissioned.
- Employees, elected members, casual workers, contractors and volunteers involved in working with adults at risk, young people and children, implement good working practices to ensure a safe and healthy environment.
- Awareness of safeguarding is raised and what to do if a form of abuse is suspected or identified.
- Sound recruitment and selection procedures are operated for employees and volunteers to ensure their suitability for working with adults at risk, young people and children.
- Provide appropriate training for employees, and volunteers who work with adults at risk, young people and children.

- Sharing information is done in compliance with our Data Protection Policy, the Data Protection legislation (currently the UK General Data Protection Regulations (GDPR) and the Data Protection Act 2018).

There are fundamental differences between the legislative framework for safeguarding adults and children, which recognises an adult's right to self-determination.

Safeguarding Adults at Risk

The Council have a duty under the Care Act 2014, with responsibilities applying to adults who:

- Have care and support needs (whether the local authority is meeting any of those needs or not).
- Are experiencing, or at risk of, abuse or neglect.
- Are unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Safeguarding Children and Young People

The Council have a duty under the Children Act 2004 to ensure that they consider the need to safeguard and promote the welfare of children and young people when carrying out their functions.

3. Terms, Types of Abuse and Definitions

Terms

Term	Definition
Safeguarding	Actions taken to protect an individual's health, wellbeing, and human rights, ensuring they live free from harm, abuse, and neglect.
Adult At Risk	An adult at risk is any person aged 18 or over who: <ul style="list-style-type: none">- Has needs for care and support.- Is experiencing, or at risk of, abuse or neglect.- As a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.- Lacks capacity to promote their rights as laid down in the Mental Health Capacity Act (2005) and Deprivation of Liberty Standards (2007).
Young Person	A young person is anyone aged 16-17, acknowledging their increased autonomy and potential for making choices about their own safety, even if those choices are unwise.
Children	A child includes everyone under the age of 18.
Child Protection	Activities undertaken to prevent children suffering or being likely to suffer significant harm.

Adult Abuse

Type	Definition	Example Indicators
Physical	Non accidental use of physical force that results or could result in bodily injury, pain or impairment including assault, hitting, slapping, pushing, misuse of medication and restraint.	Unexplained bruising, cowering or flinching, bruising consistent with being hit, unexplained burns, unexplained fractures.

Domestic Abuse	An incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality.	Unexplained bruising, cowering or flinching, bruising consistent with being hit, isolation from friends and family, emotional abuse, withholding finances, gaslighting, coercive and controlling.
Sexual	Direct or indirect involvement in sexual activity without consent.	Incontinence, difficulty/discomfort walking, excessive washing, sexually transmitted diseases, bruising/bleeding in genital areas, bruising, urinary infections.
Emotional or Psychological	Acts or behaviour which impinge on the emotional health of, or which causes distress or anguish to individuals.	Disturbed sleep, anxiety, confusion, extreme submissiveness or dependency, sharp changes in behaviour, loss of confidence or appetite.
Neglect and Acts of Omission	Ignoring or withholding physical or medical care needs which result in a situation or environment detrimental to the individual.	Ignoring medical, physical or emotional care needs (incl. dressing), failure to provide access to appropriate health care, withholding medication, adequate nutrition and heating.
Financial and Material Abuse	Unauthorised, fraudulent obtaining and improper use of funds, property or any resources of an adult at risk. Scamming and coercion in relation to an adult's financial affairs.	Unexplained or sudden inability to pay bills, unexplained withdrawals of money from accounts, personal possessions going missing, unusual interest by a friend/neighbour in financial matters.
Discriminatory	When values, beliefs or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals. Including discrimination on grounds of	Inciting others to commit abusive acts, lack of effective communication, bullying.

	<p>race, faith, religion, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes or comments and jokes based on a person's disability or any other form of harassment, slur or similar treatment.</p>	
Institutional or Organisational	<p>Where the culture of the organisations places the emphasis on the running of the establishment above the needs and care of the person.</p>	<p>Lack of care plans, contact with the outside world not encouraged, no flexibility or lack of choice.</p>
Self-neglect	<p>Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.</p>	<p>A deterioration in physical appearance, lack of grooming, rapid weight gain or loss.</p>

Child Abuse

Type	Definition	Example Indicators
Emotional	Persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development. This includes coercive control, a pattern of controlling, coercive, threatening, or abusive behaviour.	Conveying to children that they are worthless or inadequate; imposing age or developmentally inappropriate expectations; serious bullying; exploitation; isolation; segregation.
Sexual	Forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening, including use of images through social media or other IT.	Inappropriate sexual behaviour, use of language, fear of adults, recoiling from physical contact.
Neglect	The persistent failure to meet a child's psychological needs, likely to result in the serious impairment of the child's health or development.	Inadequate food, clothing or shelter. Poor access to appropriate medical care or treatment, isolation, truanting, lateness.
Physical	May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child.	Unexplained bruising, burns, fractures, weight gain or loss, repeat illness.
Criminal and Sexual Exploitation	Using a child for profit, labour, sexual gratification or some other personal or financial advantage.	Challenging behaviour; Appears to be making unwise choices. Don't understand that they are being exploited. Criminal exploitation is a main method used by County Lines gangs.

		Sexual exploitation can occur through use of technology without the child's recognition such as being persuaded to post sexual images on social media or other IT.
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Acts that constitute abuse.

Type	Definition
Female Genital Mutilation (FGM)	FGM is defined by the World Health Organisation as all procedures, involving partial or total removal of the external female genitalia, or injury to the female genital organs for non-medical reasons.
Honour Based Violence (HBV)	HBV refers to acts of violence, threats or abuse that are committed to protect or defend the perceived honour, dignity or reputation of a family or community.
Forced Marriage	Forced marriage is a marriage in which one or both parties do not, or cannot, give full and free consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.
Stalking	Stalking is a pattern of repeated, unwanted behaviour that causes a person to feel alarmed, distressed or fearful for their safety or the safety of others.
Radicalisation	Radicalisation is the process by which a person comes to adopt or support extreme political, social or religious ideas often associated with terrorism, violence or other forms of extremism.
Modern Slavery	<p>Modern Slavery refers to individuals being exploited and forced to work through threats, violence, coercion, deception, or abuse of power. It is the illegal exploitation of people for personal or commercial gain.</p> <p>Local authorities have a duty as designated 'first responder' agencies, to identify and refer all potential child victims and consenting adult victims.</p>
Human Trafficking	Human Trafficking is the recruitment, transportation, transfer, harbouring or receipt of people through

	force, fraud or coercion for the purpose of exploitation.
Cyber Crime	Cyber-crime is any criminal activity committed using computers or the internet including attacks on systems, theft of data, online fraud and exploitation. These crimes can cause serious harm and pose significant threats to adults at risk, young people and children. Cyber-crime may take the form of cyber bullying, the process of using the Internet, mobile phones or other devices to send or post text or images intended to hurt or embarrass another person. The harassment can have wide-reaching effects on the victim, as the content used to harass the victim can be spread and shared easily among many people and often remains accessible for a long time after the initial incident.

4. Governance

Confidentiality, Data Protection and Sharing of Information

Information sharing is vital in identifying and tackling all forms of abuse and neglect. The Data Protection laws should not prevent, or limit, the lawful sharing of information for the purposes of keeping adults at risk, young people and children safe. Lawful and secure information sharing between Social Services and other local agencies is essential for keeping adults and children safe and ensuring they get the support they need. Lawful sharing of information needs to be justified and documented.

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (**DPA, Part 2,18; Schedule 8, 4**).

Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of adults, young people and children. As with all data sharing, appropriate organisational and technical safeguards must be in place.

All employees and volunteers must comply with legislative requirements and the Council guidelines with regard to Confidentiality, Data Protection and Information Sharing.

The Council recognises that all information regarding the safeguarding of adults at risk, young people and children should be kept confidential. However, in order for individuals to be protected from harm, in some circumstances, usual considerations of confidentiality that might apply to other situations within the Council may be overridden.

The Council will abide with the relevant Safeguarding Board Information Sharing Protocols.

[Gloucestershire Safeguarding Adults Board](#)

<https://www.gloucestershire.gov.uk/media/vftpj3xi/gsab-information-sharing-guidance-may-2023.pdf>

[Gloucestershire Safeguarding Children Partnership](#)

<https://www.gloucestershire.gov.uk/gscp/professional-resources/effective-information-sharing-and-consent/>

The Council understands the importance of ensuring that personal data is always treated fairly, lawfully and appropriately and that the rights of individuals are upheld. The Council are fully committed to compliance with the requirements of the Data Protection Act.

The Council are required to share information for several reasons, including when information is requested in connection with an assessment of a child's needs under section 17 of the Children Act 1989, or an enquiry under section 47 of that Act, or in connection with court proceedings.

Under certain circumstances, the Council may need to share information about a child or young adult with other agencies. This information sharing is coordinated by the relevant Multi-Agency Safeguarding Hub.

The type of information that may be shared includes names, contact details, information about a person's physical or mental health or relations with others. The sharing of this information will be restricted to those who have a demonstrable need to know and robust protections, such as encryption of electronic data, will be used to share this information.

All employees and volunteers must comply with the Council's internet and e-mail policy and IT Security Policy.

The Lead Safeguarding Officer(s) will act as a first point of contact for notification of any deaths of adults at risk, young people and children on Council premises.

Information must only be shared on a 'need-to-know' basis, but Council Officers do not need consent to share information if an adult at risk, young person or child is suffering, or at risk of, serious harm.

Employees or volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

Timely information sharing is essential to effective safeguarding.

5. Responsibilities

Local Authorities have a statutory responsibility and duty of care to report issues relating to Safeguarding to the appropriate authorities/agencies, furthermore the Council will actively contribute to any Audit of safeguarding practises:

The Council are members of the Gloucestershire Safeguarding Adults Board (GSAB) and the Gloucestershire Safeguarding Children Partnership (GSCP).

We will ensure safeguarding practice reflects statutory responsibilities, Government guidance and complies with best practice and Safeguarding Boards' requirements.

All employees and elected members must ensure that they are fully aware of all policies and procedures in relation to safeguarding, are fully trained and will contribute to raising awareness, and reporting any issues or concerns around safeguarding.

Designated Senior Leaders

The Chief Executive of the Council has overall responsibility for safeguarding ensuring that their organisation fulfil safeguarding duties and responsibilities and that clear lines of accountability are established.

Leadership Team

The Leadership Team will ensure that:

- The Council meets its legal obligations.
- All safeguarding matters are treated seriously and dealt with in a timely fashion.
- Safeguarding, where applicable is considered in strategies, plans and services to ensure compliance with national and local policies.
- Employees and members are supported on all aspects of safeguarding to ensure procedures are adhered to.
- Appropriate training is facilitated, in particular, for frontline employees.
- There is a consistent overview of all contracts to ensure that the aims of this safeguarding policy are always embedded.

Designated Safeguarding Officers (DSO)

- Designated Safeguarding Lead (DSL)
- Deputy Designated Safeguarding Lead (DDSL)

Designated Safeguarding Officers will ensure that they:

- Support the leadership team, employees and elected members.
- Provide guidance and advice to aid implementation of this policy and in making a referral to appropriate agencies and to fulfil their roles in relation to safeguarding.
- Manage the logging of issues of concern and associated details.
- Provide supervision and support for all employees in matters of safeguarding issues of concern.
- Communicate to all employees when the safeguarding policy is updated with a summary of the amendments and provide easy access to the updated policy.

Safeguarding Support Officers

Safeguarding Support Officers will ensure that they:

- Support the leadership team, employees and elected members.
- Provide guidance and advice to aid implementation of this policy and in making a referral to appropriate agencies and to fulfil their roles in relation to safeguarding.
- Triage all reported issues of safeguarding concern and action appropriately.
- Manage the logging of issues of concern and associated details.

Service Managers

Service Managers will ensure that:

- The safeguarding policy is adhered to across the organisation.
- They and their employees complete and implement the appropriate safeguarding training and that this is reinforced through team meetings, 121s etc.
- Employees handling safeguarding issues are fully supported.
- They take responsibility for the quality of safeguarding adults at risk, young people and children in their service area.
- All employees and volunteers working with adults at risk, young people and children are subject to the Disclosure and Barring checks appropriate to their role and legislative requirements relevant to their role.
- They implement a culture of open communication between employees, apprentices, employers, and mentors.
- Consideration is given to social interaction in the workplace and outside within the team when working with Apprentices.

- They report any concerns in compliance with the policy.

Human Resources

Human Resources will ensure that:

- The relevant policies are in place e.g. Safer Recruitment, Disciplinary Procedures, Whistleblowing, Safeguarding Apprentices and Young People in the workplace.
- Managers are supported in the use of these policies directly and indirectly associated with safeguarding.
- Provide support with the pre-employment checks (including through the Disclosure and Barring Service (DBS)).
- All relevant posts are subject to a satisfactory disclosure being received. This will be detailed in an employee's written statement of terms and conditions of employment.
- All existing employees whose role requires a DBS certificate will be required to have a recheck every three years.
- There is awareness within the workplace for all employees working with apprentices where they are under 18, classed as young people or children, and that therefore there may be different considerations in the language used and their interaction with them.

Employees

Employees will:

- Treat all safeguarding matters seriously.
- Report any concerns in compliance with the policy.
- Be aware of and adhere to the safeguarding policy and referenced policies.
- Complete safeguarding training relevant to their role covering children, adults, prevent, domestic abuse and modern slavery.
- Demonstrate active professional curiosity.

Elected Members

Elected Members are uniquely placed to support the safeguarding of adults at risk, young people and children within their community. They can also provide effective leadership to ensure that the council are fulfilling its corporate responsibility.

Elected Members should:

- Work and abide in accordance with the Council's Safeguarding Policy and Procedures.
- Report their concerns about an adult at risk, young person or child's welfare or someone else's behaviour regarding an adult at risk, young person or child as outlined in this policy.
- Adopt good practice in terms of safeguarding when carrying out their council duties.
- Seek support or raise concerns with the Safeguarding Support Team when necessary.
- Undertake safeguarding awareness training covering children, young people, adults, domestic abuse and modern slavery.

Commissioning and Procurement

When services are commissioned and procured on behalf of the Council, it still retains a duty to ensure that those services comply with relevant statutory safeguarding responsibilities.

As part of the tendering process, the tenderer will be required to evidence documentation of their safeguarding compliance where appropriate.

The Lead Commissioner for an individual contract will be responsible, with support of the DSL and Legal team, to ensure compliance with safeguarding regulations at all stages of the commissioning process.

Contractors

The Council will ensure that:

- All contractors providing services directly related to adults at risk, young people or children must have a safeguarding policy and safeguarding practices aligning with the Council's requirements.
- Contractors providing a service to the Council such as maintenance work at a council property will be made aware of the council's procedures and policies.
- Relevant safeguarding practices are adopted by the contractor.

Volunteers

All service areas must ensure that volunteers are aware of and have received appropriate training and are fully DBS compliant in relation to this Policy.

Council owned buildings

Council owned buildings may be used by organisations providing services or activities for adults at risk, young people or children. As a condition of occupancy, all agreements relating to occupancy of the building must seek assurances that organisations have robust protocols in place to mitigate any specific safeguarding concerns and that they have a safeguarding policy in place that adheres to the principles of the relevant county Adult Safeguarding Board and Children Safeguarding Partnership.

6. Training

The followed must be adhered to in relation to training:

- All new employees and members will receive general awareness of safeguarding training at induction.
- All employees must complete the Mandatory iHASCO training modules of Level 2 Safeguarding Adults and Level 2 Safeguarding Children and subsequent refresher modules. Specific focus will be put on timing of undertaking the training for those involved in the training and mentoring of apprentices and young people.
- Responsible and Lead Officers should ensure that there is the right level of staff trained to Level 3 Safeguarding.
- All employees must complete the Prevent Duty classed as Mandatory in iHASCO.
- Employees are encouraged to complete the Modern Slavery training which is an optional module in iHASCO.
- All employees must complete the Business Compliance training which includes elements of Modern Slavery which is an iHASCO Mandatory module.
- All Taxi and Private Hire Drivers must undertake safeguarding training. This is facilitated by the Council prior to a licence being issued. A refresher must be undertaken every three years. If a driver has their licence suspended, they must provide a renewed certificate of safeguarding for a licence to be reissued.
- The Council will seek to ensure that any knowledge is cascaded appropriately across the organisation and opportunities to enhance and upskill through additional training are shared.

7. How To Report A Concern

Our duty of care extends to employees, adults at risk, young people and children and as adults with trust and influence, our employees are in a powerful position to recognise and receive information about abuse.

It is not the responsibility of an employee to take responsibility for deciding whether abuse is taking place. It is their responsibility to take all allegations seriously whether the allegation is about an employee or the public and raise the issue of concern by following the procedures detailed in the flowchart below.

Where there are concerns about an employee's behaviour outside the workplace towards an adult at risk, young person or child, this should be reported at the earliest opportunity to the Designated Safeguarding Lead or appropriate Service Manager.

The Council assures all employees and volunteers, that it will fully support and protect anyone who in good faith (without malicious intent) report his or her concerns about a colleague's practice or the possibility that a person may be being abused or bullied. Furthermore, the Council recognises it has a duty of care to an employee against whom allegations have been made.

Issues of concern

[Link to the Council's Portal for page to raise an issue of concern](#)

<https://portal.cotswold.gov.uk/cdc-portal/Is/content/4599586769073599/support/safeguarding>

Gloucestershire direct referrals

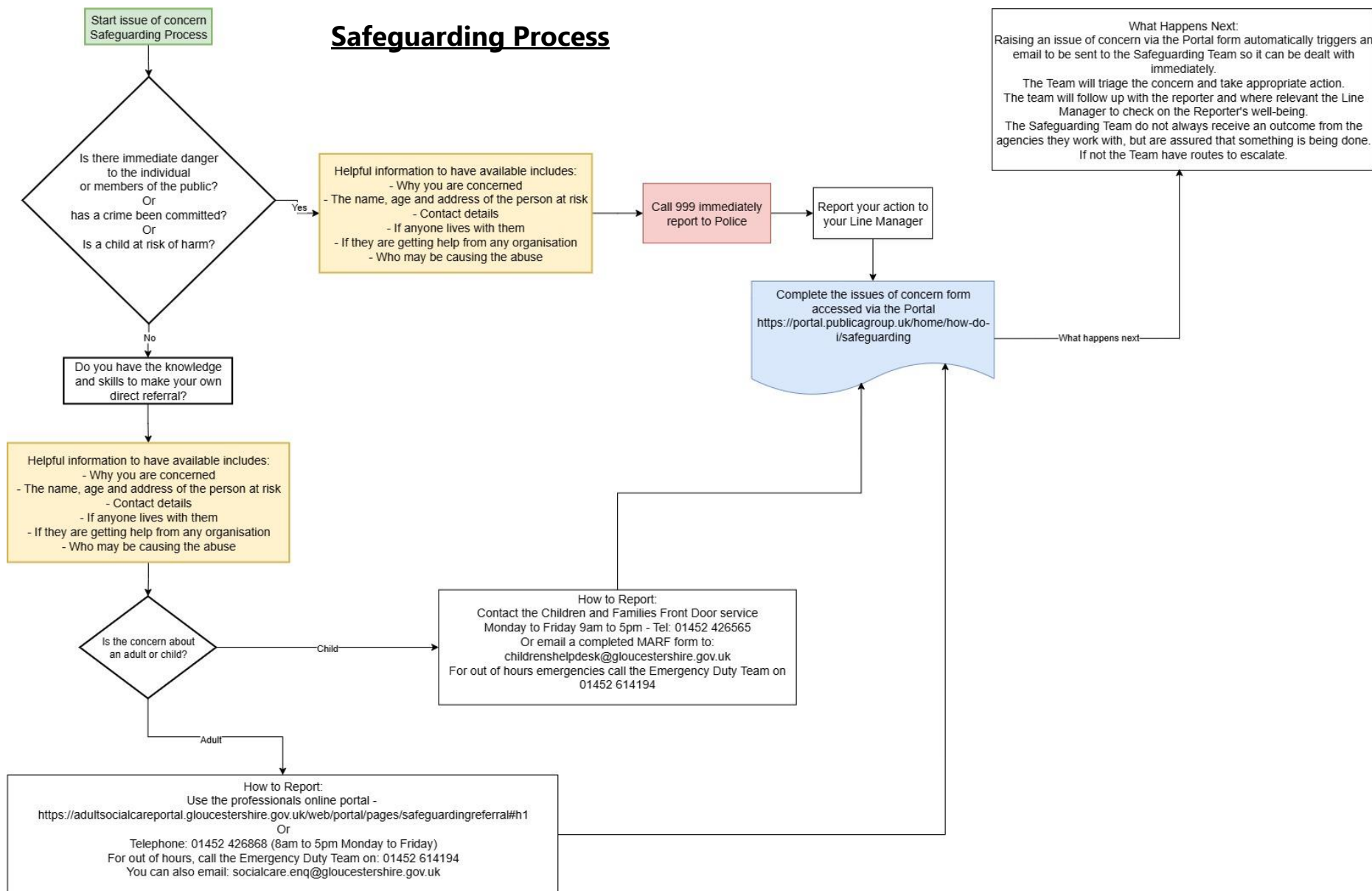
For children – contact the Children and Families Front Door service Monday to Friday 9am to 5pm Tel: 01452 426565 or email a completed MARF form to childrenshelpdesk@gloucestershire.gov.uk

For out of hours emergencies, call the Emergency Duty Team: 01452 614194

For adults – use the [Professionals online portal](#) or call: 01452 426868 (8am to 5pm Monday to Friday)

For out of hours emergencies, call the Emergency Duty Team: 01452 614194

Safeguarding Process



What Happens Next

If the issue of concern is referred directly to an external organisation, they will undertake their own investigation and determine next steps in the process. We may not receive any feedback on the outcome.

If the issue of concern is reported through the Portal, the Safeguarding Support Team/Leads will consider the information provided and decide whether or not the concern needs reporting to the appropriate Safeguarding bodies, whether signposting to support groups or other organisations is required, or if no further action should be taken. The person reporting the issue of concern may be contacted by a member of the Safeguarding Team to discuss the matter further and to check in on wellbeing.

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Equality Impact Assessment Form

1. Persons responsible for this assessment:

Names: Paula Massey	
Date of assessment: 01.08.2025	Telephone: 01594 812389 Email: paula.massey@publicagroup.uk

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

Safeguarding Policy Update July 2025

3. Briefly describe it aims and objectives

To update the existing corporate Safeguarding Policy to ensure the Council meets its statutory responsibility and duty of care in reporting safeguarding issues and that its members, officers, contractors and those commissioned to provide services are aware of their legal obligations to safeguard children, young people and adults at risk.

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

The Care Order Act 2014 The Children Act 2004
--

5. What evidence has helped to inform this assessment?

Source	✓	If ticked please explain what
Demographic data and other statistics, including census findings	<input type="checkbox"/>	
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	✓	Gloucestershire Adults Safeguarding Board; Gloucestershire Safeguarding Children Partnership; Gloucestershire Safeguarding Districts Sub-Group
Comparisons between similar functions / policies elsewhere	✓	Gloucestershire Safeguarding Adults Board (GSAB). Gloucestershire Safeguarding Children Partnership (GSCP) Other Districts Recently Refreshed Policies
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	<input type="checkbox"/>	

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

n/a

7. Has any consultation been carried out?

Internal consultation and engagement will be undertaken as necessary to ensure the effective implementation and delivery of this Policy.

If NO please outline any planned activities

N/A

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	✓
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"/>

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 proposal is inclusive to people of different age groups, but it is not specific to age.	
Age – Old People		✓		The proposal is inclusive to all ages.	
Disability		✓		The proposal is inclusive to people with disabilities but is not specific to disability.	
Sex – Male		✓		The proposal is inclusive to all gender groups, but it is not specific to gender.	
Sex – Female		✓			
Race including Gypsy and Travellers		✓		The proposal is inclusive to people of all races, but it is not specific to race.	
Religion or Belief		✓		The proposal is inclusive to people of all religions, but it is not specific to religion.	
Sexual Orientation		✓		This proposal is inclusive to all types of sexual orientation, but it is not specific to sexual orientation.	
Gender Reassignment		✓		The proposal is inclusive to all gender groups, but it is not specific to gender.	
Pregnancy and maternity		✓		The proposal is inclusive to people who are pregnant and/or maternity leave, but it is not specific to this group.	
Geographical impacts on one area		✓		The proposal is inclusive to the whole of Cotswold district.	
Other Groups				This proposal is inclusive of all the other groups that are not mentioned.	



Rural considerations: ie Access to services; leisure facilities, transport; education; employment; broadband.		✓		The proposal is inclusive to the whole Cotswold district	
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10. Action plan (add additional lines if necessary)

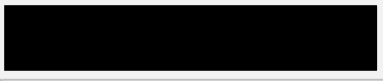
Action(s)	Lead Officer	Resource	Timescale

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

n/a

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 Council and that I/we take responsibility for the completion and quality of this assessment.

Completed By:	Paula Massey	Role:	Enabling Manager and Deputy Designated Safeguarding Lead	Date:	01.08.2025
Line Managers signature:		Role:	Susan Hughes, Business Manager Support and Advice and Designated Safeguarding Lead	Date:	05/08/2025



Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET – 16 OCTOBER 2025
Subject	COUNCIL TAX SUPPORT SCHEME 2025/26
Wards affected	All
Accountable member	Cllr Patrick Coleman – Cabinet Member for Finance Email: patrick.coleman@cotswold.gov.uk
Accountable officer	Jon Dearing – Interim Executive Director Email: Democratic@Cotswold.gov.uk
Report author	Mandy Fathers – Business Manager for Environmental, Welfare and Revenues Email: Democratic@Cotswold.gov.uk
Summary/Purpose	To consider and recommend to Full Council the revised Council Tax Support Scheme for the financial year 2026/2027.
Annexes	Annex A – Financial Modelling Annex B – Equality Impact Assessment
Recommendation(s)	<p>That Cabinet recommends to Full Council to:</p> <ol style="list-style-type: none"> 1. Agree the increase to income bands as detailed within paragraphs 3.2, 3.3 and Annex A of this report from 1 April 2026. Delegate authority to the Deputy Chief Executive and Section 151 Officer, in Consultation with the Cabinet Member for Finance, to amend the income bands by the September 2025 CPI rate due to be published on 22 October 2025, should this be different to the assumed increase set out in the report and annex A. 2. Agree that any balance remaining in the earmarked reserve 'Hardship Fund' be made available in 2026/27 financial year for reasons detailed in paragraphs 3.6 and 3.7 of this report.

Corporate priorities	<ul style="list-style-type: none"> • Supporting Communities • Delivering Good Services
Key Decision	NO
Exempt	NO
Consultees/ Consultation	Chief Executive, Chief Finance Officer and Deputy Chief Executive, Director of Governance and Development, Head of Legal Services, Chief Accountant and Deputy Section 151 Officer, Interim Managing Director Publica) Cabinet Member for Finance

1. EXECUTIVE SUMMARY

- 1.1** Council Tax Support is a scheme to reduce Council Tax bills for people on low income and/or who receive benefits. This report brings forward proposals to amend the scheme for 2026 in order to give more support to those on low incomes.

2. BACKGROUND

- 2.1** Councils are required to review their Council Tax Support (CTS) schemes each year for those people of working age and decide if they want to make any changes.
- 2.2** As there are no impactful changes proposed to the scheme, consultation was not carried out. However, once the scheme has been approved, it will be published on the Council's website as well as various social media platforms.

3. MAIN POINTS

- 3.1** The Council implemented its own local CTS scheme of support to help those people on low incomes pay their Council Tax in April 2013. Further changes were made in April 2020, introducing the income banded scheme.
- 3.2** Annual wage growth is expected to be between 3% and 4% in Q4 of 2025 and to remain at a similar level during 2026. It is not yet known what the 2026 percentage inflationary increase will be for welfare benefits. Without changes to the CTS scheme, this would result in more households being moved into a high-income band and therefore having to pay a higher share of the full Council Tax for their property.
- 3.3** To continue to give support to households during the ongoing cost of living crisis, proposals are being made to increase weekly income bands by 3.5% or in line with the inflationary increase in welfare benefits. Based on a 3.5% increase, the bands would increase as follows:

3.50%	Single	Couple	Lone Parent	Lone Parent + 2	Lone Parent + 3	Lone Parent + 4	Couple + 1	Couple + 2	Couple + 3	Couple + 4	
Band 1	0 - 154.03	0 - 182.55	0 - 211.08	0 - 233.90	0 - 256.72	0 - 302.36	0 - 279.54	0 - 302.36	0 - 325.18	0 - 370.82	100
Band 2	154.04 - 204.03	182.56 - 222.55	211.09 - 246.08	233.91 - 268.90	256.73 - 291.72	302.37 - 337.36	279.55 - 329.54	302.37 - 352.36	325.19 - 375.18	370.83 - 420.82	80
Band 3	204.04 - 254.03	222.56 - 272.55	246.09 - 296.08	268.91 - 318.90	291.73 - 341.72	337.37 - 387.36	329.55 - 379.54	352.37 - 402.36	375.19 - 425.18	420.83 - 470.82	60
Band 4	254.04 - 304.03	272.56 - 322.55	296.09 - 346.08	318.91 - 368.90	341.73 - 391.72	387.37 - 437.36	379.55 - 429.54	402.37 - 452.36	425.19 - 475.18	470.83 - 520.82	40
Band 5	304.04 - 354.03	322.56 - 372.55	346.09 - 396.08	368.91 - 418.90	391.73 - 441.72	437.37 - 487.36	429.55 - 479.54	452.37 - 502.36	475.19 - 525.18	520.83 - 570.82	20
Band 6	354.04 +	372.56 +	396.09 +	418.81 +	441.73 +	487.37 +	479.55 +	502.37 +	525.19 +	570.83 +	0

- 3.4** Based on the current CTS caseload used for remodelling the scheme, there is no impact, either negative or positive on CTS claimants as all retain their initial modelling bands.

3.5 In 2022/23 the Council implemented a Hardship Fund to support those residents who were struggling financially and provided the Council with evidence of financial hardship. This fund was created with financial support from Gloucestershire County Council, and Cotswold District Council. The fund was originally set at £40,000. To date there remains around £35,000.

3.6 Recommendations are being made to transfer any funding surplus into the financial year 2026/27 to ensure that the Council continues to support those residents in financial hardship.

3.7 The Council's client support officers continue to reach and offer additional support to who apply for this funding to ensure any long-term hardship is minimised. This might be through negotiating better details with utility companies, maximising benefit take-up, addressing expenditure or sign posting to another organisation for support,

4. FINANCIAL IMPLICATIONS

4.1. The Council administers a CTS scheme with an annual expenditure of approximately £4.9 million. From 2013/14, the Government reduced the level of funding for the local scheme effectively creating a grant reduction of 10% a year across all of the precepting authorities.

4.2 Any increase in the take-up of CTS will lead to a reduced tax-base and therefore reduced income to precepting bodies.

4.3 The proposed changes increase the estimated cost of the CTS scheme by approximately £18,000. This will be reflected in a decrease in the Council Tax base and Council Tax income recognised in the Collection Fund. The decrease in income will be spread proportionately across the major precepting authorities (Gloucestershire County Council, The Office of the Police and Crime Commissioner and Cotswold District Council as well as the Town and Parish Councils). Making these proposed changes will decrease the total tax base by the equivalent of 8 band D properties and a loss of income as follows:

Financial Year	GCC	Police	Town/Parish	Cotswold	Total

2026/2027	£13,279	£2,547	£918.00	£1,256	£18,000
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- 4.4** The reduction in Council Tax income retained by the Council of £1,256 will be taken into account as part of the 2026/27 budget setting process.

5. LEGAL IMPLICATIONS

- 5.1.** The Welfare Reform Act 2012 abolished Council Tax Benefit and instead requires each authority to design a scheme specifying the reductions, are to apply to amounts of Council Tax.
- 5.2** The CTS scheme is required under Section 13A of the Local Government Finance Act 1992 ("the Act"), as amended. The Act states that for each financial year, billing authorities must consider whether to revise their CTS scheme or replace it with another.
- 5.3** The deadline for making decisions is 11 March in the financial year preceding that for which the revision or replacement scheme is to take effect (under paragraph 5, schedule 1A of the Act). If the Council does not make/revise a CTS scheme by 11 March 2026, a default scheme will be imposed on the Council, which will be effective from April 2026.

6. RISK ASSESSMENT

- 6.1** There are two risks to consider:
- That the benefit caseload increases significantly, resulting in expenditure exceeding the levels estimated within this report. To mitigate this risk, monthly monitoring is conducted, and any significant increase in caseload would be referred to the Chief Finance Officer.
 - If the income bands are not increased in line with inflation, CTS for vulnerable households could reduce. This could cause reputational damage to the Council.

7. EQUALITIES IMPACT

- 7.1.** To ensure compliance with the Equality Act 2010, an equality impact assessment has been completed and attached to this report under Annex B.

8. CLIMATE CHANGE IMPLICATIONS

8.1. None

9. ALTERNATIVE OPTIONS

9.1. None.

10. BACKGROUND PAPERS

10.1.None.

(END)



Current	Single	Couple	Lone Parent	Lone Parent + 2	Lone Parent + 3	Lone Parent + 4	Couple + 1	Couple + 2	Couple + 3	Couple + 4	
Band 1	0 - 148.82	0 - 176.38	0 - 203.94	0 - 225.99	0 - 248.04	0 - 292.14	0 - 270.09	0 - 292.14	0 - 314.18	0 - 358.28	100
Band 2	148.83 - 198.82	176.39 - 216.38	203.95 - 238.94	226.00 - 260.99	248.05 - 283.04	292.15 - 327.14	270.10 - 320.09	292.15 - 342.14	314.19 - 364.18	358.29 - 408.28	80
Band 3	198.83 - 248.82	216.39 - 266.38	238.95 - 288.94	261.00 - 310.99	283.05 - 333.04	327.15 - 377.14	320.10 - 370.09	342.15 - 392.14	364.19 - 414.18	408.29 - 458.28	60
Band 4	248.83 - 298.82	266.39 - 316.38	288.95 - 338.94	311.00 - 360.99	333.05 - 383.04	377.15 - 427.14	370.10 - 420.09	392.15 - 442.14	414.19 - 464.18	458.29 - 508.28	40
Band 5	298.83 - 348.82	316.39 - 366.38	338.95 - 388.94	361.00 - 410.99	383.05 - 433.04	427.15 - 477.14	420.10 - 470.09	442.15 - 492.14	464.19 - 514.18	508.29 - 558.28	20
Band 6	348.83 +	366.39 +	388.95 +	411.00 +	433.05 +	477.15 +	470.10 +	492.15 +	514.19 +	558.29 +	0
3.50%	Single	Couple	Lone Parent	Lone Parent + 2	Lone Parent + 3	Lone Parent + 4	Couple + 1	Couple + 2	Couple + 3	Couple + 4	
Band 1	0 - 154.03	0 - 182.55	0 - 211.08	0 - 233.90	0 - 256.72	0 - 302.36	0 - 279.54	0 - 302.36	0 - 325.18	0 - 370.82	100
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Band 6	354.04 +	372.56 +	396.09 +	418.81 +	441.73 +	487.37 +	479.55 +	502.37 +	525.19 +	570.83 +	0

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Equality and Ruralty 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 to be signed off by an equalities officer before being published.

1. Persons responsible for this assessment:

Names: Mandy Fathers

Date of assessment: 05/09/2025

Telephone: 01285 623571

Email: mandy.fathers@cotswold.gov.uk

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

Existing – Council Tax Support Scheme 2026/2027

3. Briefly describe it aims and objectives

To make slight amendments to the Banding in the scheme

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

Section 13A of the Local Government Finance Act 1992 states a CTS scheme is required and Section 40 of the Local Government Finance Act 1992 states that the council must consult. Under paragraph 5, schedule 1A of the same Act, the Council is required to have a scheme approved by 11 March 2024.

5. What evidence has helped to inform this assessment?

Source	✓	If ticked please explain what
Demographic data and other statistics, including census findings	<input checked="" type="checkbox"/>	Demographic data was used when modelling the scheme
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 checked="" type="checkbox"/>	A valued third sector support advocate for the district has been consulted with
Comparisons between similar functions / policies elsewhere	<input checked="" type="checkbox"/>	Comparisons with previous schemes and those of neighbouring LA's has been considered
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	<input type="checkbox"/>	

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

N/A

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	✓
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"/>
Comments: e.g. Who will this specifically impact?	

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 proposal is inclusive to people of different age groups, but it is not specific to age	
Age – Old People			✓	The scheme is for working age people only – Pensioners have a different CTS scheme which is mandated by Central Government	
Disability			✓	The proposal is inclusive to people with disabilities but is not specific to disability	
Sex – Male			✓	The proposal is inclusive to all gender groups, but it is not specific to gender	
Sex – Female			✓	The proposal is inclusive to all gender groups, but it is not specific to gender	
Race including Gypsy and Travellers			✓	The proposal is inclusive to people of all races, but it is not specific to race	
Religion or Belief			✓	The proposal is inclusive to people of all religions, but it is not specific to religion	

Sexual Orientation			✓	This proposal is inclusive to all types of sexual orientation, but it is not specific to sexual orientation	
Gender Reassignment			✓	The proposal is inclusive to all gender groups, but it is not specific to gender	
Pregnancy and maternity			✓	The proposal is inclusive to people who are pregnant and/or on maternity, but it is not specific to this group	
Geographical impacts on one area			✓	The proposal is inclusive to the whole of the Cotswold district	
Other Groups			✓	This proposal is inclusive to all other groups that are not mentioned	
Rural considerations: ie Access to services; leisure facilities, transport; education; employment; broadband.			✓	The proposal is inclusive to the whole of the Cotswold district	

10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale
Change Policy when approved	Mandy Fathers	Craig Fisher	Following full Council approval in early 2026

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

n/a

Declaration

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where an 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:	Mandy Fathers	Date:	05.09.25
Line Manager:	Jon Dearing [REDACTED]	Date:	05.09.25
Reviewed by Corporate Equality Officer:	Cheryl Sloan [REDACTED]	Date:	08/09/2025

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COTSWOLD
District Council

Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET (16 OCTOBER 2025)
Subject	COTSWOLD DISTRICT LOCAL PLAN REGULATION 18 PREFERRED OPTIONS CONSULTATION AND LOCAL DEVELOPMENT SCHEME
Wards affected	All
Accountable member	Councillor Juliet Layton Deputy Leader of Cotswold District Council and Cabinet Member for Housing and Planning Email: Juliet.Layton@cotswold.gov.uk
Accountable officer	Geraldine LeCointe – Assistant Director of Planning Services Email: Geraldine.LeCointe@cotswold.gov.uk
Report author	Jo Symons, Head of Planning Policy & Infrastructure Email: Jo.Symons@cotswold.gov.uk
Summary/Purpose	To seek approval to consult on the Preferred Options for development in the Cotswold District for the Regulation 18 consultation, and further technical documents as and when necessary; and to approve the updated Local Development Scheme to progress the Plan to submission in winter 2026 and adoption in winter 2027.
Annexes	Annex A: Cotswold District Council Local Plan Review Regulation 18 Consultation Preferred Options (November 2025) Annex B: Cotswold District Local Development Scheme (October 2025)
Recommendation(s)	That Cabinet resolves to: 1. Approve the Cotswold District Council Local Plan Review Regulation 18 Consultation Preferred Options (November 2025) document and commence a six-week public consultation on this and a call for sites from 5 November 2025 to 18 December 2025.



	<ol style="list-style-type: none"> 2. Delegate authority to the Director of Communities and Place, the Accountable Officer and the Cabinet Member for Housing and Planning to agree any minor amendments or additions to the Consultation Document prior to the Regulation 18 Consultation. 3. Delegate authority to the Director of Communities and Place and the Cabinet Member for Housing and Planning to approve for consultation any supporting technical documents for the Regulation 18 consultation. 4. Delegate authority to the Director of Communities and Place and the Cabinet Member for Housing and Planning to approve additional technical documents for further Regulation 18 consultation as and when necessary. 5. Approve the Local Development Scheme.
Corporate priorities	<ul style="list-style-type: none"> • Responding to the Climate Emergency • Delivering Housing • Supporting Communities • Supporting the Economy
Key Decision	YES
Exempt	NO
Consultees/ Consultation	Chief Executive; Deputy Chief Executive and S151 Officer; Director of Governance and Development (Monitoring Officer); Chief Accountant and Deputy Section 151 Officer; Head of Legal Services; Director – Communities and Place; Assistant Director – Planning Services; and Strategic Housing Manager.



EXECUTIVE SUMMARY

- 1.1** This report seeks approval from Cabinet to consult on the Preferred Options for development in the Cotswold District as part of the Regulation 18 consultation which aims to gather public feedback on the proposed development strategy for the updated Local Plan. A further call for sites is also proposed to further sites to help meet the required government housing target, as well as for other types of required development and infrastructure.
- 1.2** The report also seeks approval for an updated Local Development Scheme, which outlines the timeline for progressing the Local Plan to submission in winter 2026 and adoption in winter 2027.
- 1.3** The Council has already undertaken two Regulation 18 consultations on this Plan review to date. The first was in February/March 2022 on the Partial Local Plan Update to identify 'Issues and Options'. The second was in February/March 2024, where the Council undertook consultations on both the 'Draft Policies' of the Partial Local Plan Update and 'Issues and Options' for the Development Strategy and Site Allocations Plan.
- 1.4** However, given the significant increase in the number of homes the government calculates to be needed in the district, a further Regulation 18 consultation is required. The consultation will seek views on the most appropriate locations for development and will include another Call for Sites.
- 1.5** The Consultation Document attached in Annex A outlines seven development strategy scenarios to accommodate the additional growth with a preferred option, scenario 5, that maximizes housing delivery while also delivering sustainable development. This preferred option seeks to allocate sites in Principal Settlements, Non-Principal Settlements and village clusters; supports Rural Exception Sites in rural settlements; and would create new settlement(s) and/or strategic extensions to existing settlement(s). Several evidence base documents will be published alongside the consultation that evidence the approach that has been taken.
- 1.6** Scenario 5 includes a housing land supply of 14,660 homes, equating to 79% of the district's housing target of 18,650 homes based on the government's standard methodology. However, due to historic under delivery and national planning requirements, the Council is likely to need to plan for more homes than are



technically required to ensure sufficient actual delivery. This is particularly important given that Scenario 5 depends heavily on eight large sites (each over 500 homes), which are typically complex and prone to delays. As a result, actual delivery from Scenario 5 during the Local Plan period is expected to be closer to 11,730 homes—around 20% below the planned figure.

- 1.7** Given that Scenario 5 leaves a shortfall of homes to deliver the full housing target, it will be necessary to ask neighbouring local planning authorities if they can deliver any unmet housing target.
- 1.8** Delegated authority is also sought to seek public feedback on further pieces of evidence at a later date. These pieces of evidence will further inform our development strategy and include the Housing and Economic Needs Assessment which will provide our housing types and employment requirement figure, a Gypsy and Traveller Needs Assessment and a Retail and Town Centre Study.
- 1.9** The report recommends that the Council progress to its Regulation 18 Consultation on its Preferred Option for the Local Plan Review. All responses from the consultation will be reviewed and, where appropriate, will inform the site selection process and the draft Local Plan.
- 1.10** The report also recommends the approval of an updated Local Development Scheme for publication in accordance with regulations.

2. BACKGROUND

- 2.1** In July 2025 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 (incorporating work of the Gloucestershire Transitional Spatial Strategy, where appropriate), with a view to submission in 2026 and adoption in 2027.
- 2.2** This report seeks endorsement from Cabinet to go out to consultation on the Council's Preferred Options for development for its Regulation 18 Consultation.
- 2.3** The Council has already undertaken two Regulation 18 consultations on this Plan review to date; the first February/March 2022 on the Partial Local Plan Update to



identify 'Issues and Options' that the Local Plan needed to respond to; and the second in February/March 2024 where the Council undertook consultations on both the 'Draft Policies' of the Partial Local Plan Update and 'Issues and Options' for the Development Strategy and Site Allocations Plan, the latter considering development options beyond 2031.

- 2.4** In the report to Council in July 2025, it was noted that given the significant increase to the number of homes the government calculates to be needed in the district, a further Regulation 18 consultation would be required.
- 2.5** The report also noted that a Broad Locations Study was being undertaken which would look at the constraints of the district and assess where appropriate locations may be situated for new settlements or extensions to existing settlements. It noted that a Settlement Role and Function Study was also being undertaken, and this would consult our parishes on their facilities and look at public transport to establish the sustainability of each settlement. From this Study, a settlement hierarchy would be established to help in allocating a sustainable level of development across the district whilst considering constraints. Based on these studies, it was proposed that the next Regulation 18 consultation would seek views on the most appropriate locations for development; and another Call for Sites would also be undertaken.
- 2.6** Since that time the team have made good progress on progressing evidence, and further work has been produced to inform the consultation: all of the sites have now been visited, and whilst the site assessments will not be fully complete for the Regulation 18 consultation; the team have indicative figures for housing for each proposed Principal and Non-Principal Settlement or area.
- 2.7** By front loading consultation on the preferred areas of development at this stage; the Council will minimise further issues arising at the subsequent Regulation 19 consultation stage. The team have also undertaken an Advisory Meeting with the Planning Inspectorate (PINS), where a Planning Inspector advised that it is preferable, if possible, to consult on the preferred locations for development prior to Regulation 19. This is also in accordance with advice from the Planning Advisory Service (PAS).
- 2.8** This report therefore recommends a consultation on several potential development strategy options and the Preferred Option for how development will be distributed



across the district in the future. These options are set out in the Council's Development Strategy Technical Paper, as well as the Consultation Document itself.

2.9 A Communications Strategy and a Communications Plan have been developed to provide a considered consultation approach in this regard and these follow the Council's adopted Statement of Community Involvement¹.

2.10 This report also sets the timetable for adoption of the Plan. The Plan is on target to be submitted to the Planning Inspectorate in December 2026 with adoption envisaged in 2027. An updated Local Development Scheme is attached in Annex B and Cabinet is recommended to approve this.

3. Consultation Approach

3.1 In December 2024, the newly elected Government produced a revised version of the National Planning Policy Framework (December 2024) (the NPPF). The changes included a new, mandatory Standard Method for calculating the number of homes needed in each local planning authority area. Areas with the highest levels of unaffordable housing were given increased housebuilding targets. As a result, and due to high house prices in Cotswold District, the district received a more than 100% increase to its target, more than doubling of the previous target. The number of homes needed in the district is now calculated to be 1,036 homes a year.

3.2 As a result of this change, and the implications this has had for the Council's five-year supply; the Council has committed to undertaking a full review of its Local Plan with a view to adoption by December 2027.

3.3 As part of this review, it is necessary to undertake a further Regulation 18 consultation to show how the Council proposes to respond to the significant increase in the district's housing target. In doing so, it is proposed that the Council consults on its development strategy options with a preferred approach for development; and seeks views on this. This approach will provide indicative numbers for settlements and broad areas for proposed development. It will not, however, show specific sites, as further work is needed in this regard, but it will give consultees an indication of where the majority of development is likely to be located, including illustrating this diagrammatically on maps.

¹ [Statement of Community Involvement](#)



- 3.4** As noted in the background explanation, Officers have been advised by both the Planning Inspectorate and PAS, that it is preferable to consult on preferred areas/options for development at Regulation 18 stage; as it enables the Council to address concerns and resolve issues where possible at this stage, as opposed to leaving such decisions to be addressed by an Inspector following a Regulation 19 consultation. Thus, this approach provides greater flexibility and allows the Council to address issues of soundness at an early stage, paving the way for examination.
- 3.5** The Inspector can only address issues of soundness and legality raised by respondents at Regulation 19 stage; and it is only those who provide responses at the Regulation 19 stage who are allowed to appear at an examination hearing.

4. Consultation Document

- 4.1** The Consultation Document, as provided in Annex A, sets out the proposed plan period for 2025-2043, enabling the Local Plan to look ahead 15 years from the anticipated point when the Local Plan is adopted.
- 4.2** Consideration is given to the amount of additional development that would likely be needed for the 18-year plan period. Based on current estimations, the following provides a useful indication.
- i. 18,650 additional new homes are needed in the new local plan period.
 - ii. 6,150 homes already have planning permission, are remaining site allocations from the adopted Local Plan or are expected to be delivered as windfalls (i.e. sites not specifically identified in the Local Plan), which can contribute towards delivering the housing target.
 - iii. A supply of additional sites capable of delivering 12,500 homes is needed to fully deliver the housing target (i.e. $18,650 - 6,150 = 12,500$ homes).
- 4.3** Seven development strategy options have been identified to accommodate the additional growth:
- i. Scenario 1: Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters and support Rural Exception Sites in Rural Settlements.
 - ii. Scenario 2: Allocate sites in Principal Settlements, Non-Principal Settlements, Village Clusters and Rural Settlements.
 - iii. Scenario 3: Main Service Centre focus.



- iv. Scenario 4: Focus growth around transport nodes.
- v. Scenario 5: Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters. Support Rural Exception Sites in Rural Settlements. Create new settlement(s) and/or strategic extensions to existing settlement(s).
- vi. Scenario 6: Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters. Support Rural Exception Sites in Rural Settlements. Create new settlement(s) and/or strategic extensions to existing settlement(s). Support major development within the Cotswold National Landscape
- vii. Scenario 7: Maximise growth across the district (for example, via additional new settlement(s) / strategic extensions)

4.4 Scenarios 5 is the preferred option. It is currently estimated that this option could provide a supply of housing sites of around 14,660 homes. This is the only approach that maximises housing delivery whilst also delivering sustainable development. This approach is illustrated to show the amount of housing it could deliver in Principal and Non-Principal Settlements, Rural Exception Sites for affordable housing, as well as proposed areas for strategic scale development (500 or more homes).

4.5 The total estimate of 14,660 homes from scenario 5 would provide a housing land supply that is 79% of the 18,650 housing target calculated using the government's 'standard methodology'. However, because the district has previously fallen short of its housing targets, national rules will likely require the Council to plan for more homes than are actually needed, just to make sure enough get built. This is especially so given that scenario 5 relies on the delivery of eight large sites of 500 or more homes, and that these types of sites are often delayed. This means that although 14,660 homes are planned, we realistically expect around 20% fewer homes to be built during the Local Plan period, meaning that scenario 5 would be expected to deliver around 11,730 homes.

4.6 Scenario 5 leaves a shortfall of 6,920 homes to deliver the full requirement figure. It will therefore be necessary to ask the district's neighbouring local planning authorities whether they can delivery any of unmet housing need in their areas.



- 4.7** The figures identified are intended to provide an indication of the approximate number of additional homes that can potentially be delivered in the Local Plan based on current evidence. The figures may go up or down as they will be updated to reflect future annual monitoring of development sites, evidence base documents that are currently underway (e.g. the Moreton-in-Marsh Feasibility Study), and the outcome of the Call for Sites from this Local Plan Regulation 18 consultation, which will allow landowners, developers and members of the public to put forward further sites to enable the Council to assess their potential for being allocated for development in the Local Plan.
- 4.8** The Call for Sites will have a specific focus on areas identified as having potential for further investigation in the Assessment of Broad Strategic Development Locations (the Broad Locations Study) and within and surrounding Principal and Non-Principal Settlements identified by the proposed Local Plan Development Strategy.
- 4.9** The Broad Locations study found no 'obvious' parts of the district that could be readily developed. However, it did identify areas that require further detailed assessment (in terms of mitigating constraints etc.) to determine their suitability and the level of development that could occur (if any). More information on this Call for Sites can be found in Chapter 6 of the Consultation Document.
- 4.10** The needs / requirements and land supply for other types of development and infrastructure are being further assessed and will be included within the updated development strategy. This includes, for example, the need for different types of employment development, gypsy and traveller accommodation, etc.

5. Supporting Technical Evidence

- 5.1** Although supporting technical evidence base documents do not form part of the Regulation 18 consultation, they provide important background information for consultees. Several completed evidence base documents will be published alongside the consultation.
- 5.2** Delegated authority is sought for the Director of Planning and Communities and the Cabinet Member for Housing and Planning to approve these documents for publication prior to the consultation.
- 5.3** A summary of the supporting technical evidence is provided below, and public feedback will be sought on these documents:



- 5.3.1 Broad Locations Study:** This report is one of the first steps in identifying suitable sites for development. It aims to identify broad locations that would be suitable for strategic development (defined in this study as developments of five hundred or more homes). These can be either large urban extensions to existing settlements or new settlements.
- 5.3.2** The assessment shows that there are no realistic opportunities for a large new town of over 10,000 houses, although (parts of) zones have been identified that potentially could accommodate a new village or small town. However, this study is a high-level assessment of potentially suitable locations for development. The full impact of development in specific locations within the Broad Zones will need to be looked at in more detail to confirm the suitability of those areas for development while considering the balance between housing and other development needs and adverse impacts.
- 5.3.3 Development Strategy Options Technical Report:** This report explores different spatial strategies for accommodating future growth. Its purpose is to assess a range of development scenarios that could deliver housing, employment, infrastructure, and other land uses over the plan period. The report outlines the planning context, including national policy requirements, housing need calculations, and land supply considerations. It then presents and evaluates multiple strategic options, each based on different principles such as settlement hierarchy, transport accessibility, and the potential for strategic-scale development. The report is intended to inform decision-making on the preferred development strategy, ensuring it is evidence-led, sustainable, and aligned with local and national planning objectives.
- 5.3.4 Non-Strategic Site Selection Methodology:** The Non-Strategic Site Allocations Selection Methodology outlines a comprehensive, multi-stage process for identifying and assessing potential housing sites for inclusion in the Cotswold District Local Plan Update (2025–2043). It begins by identifying settlements requiring allocations and drawing candidate sites from the Strategic Housing and Economic Land Availability Assessment (SHELAA). Sites are then filtered through initial screening (e.g. availability, access, size), followed by assessments of primary constraints (such as flood risk, landscape sensitivity, heritage and ecological designations) and secondary constraints (including accessibility, agricultural land quality, and environmental impact). Viability testing and a final planning balance are



applied in accordance with paragraph 11b(ii) of the National Planning Policy Framework (2024), weighing benefits such as climate resilience, biodiversity net gain, infrastructure delivery, and affordable housing against potential harms. The methodology ensures that only deliverable and developable sites aligned with the Local Plan strategy are recommended for allocation, with final decisions made by Council Members.

5.3.5 Landscape Assessment Methodology: The landscape assessment methodology is a structured, multi-stage approach designed to evaluate the sensitivity of land around settlements in Cotswold District to development. It begins with a desk study that examines landscape character, designations, ecological and historic assets, and changes in built form. This is followed by site surveys to verify findings, assess constraints, and identify opportunities for mitigation. Sensitivity is defined by combining a site's susceptibility to change with its landscape value, considering factors such as visibility, enclosure, topography, proximity to heritage assets, and ecological significance. Sites are rated on a five-point scale (Low to High) and mapped to a traffic light system to guide development suitability. The methodology integrates national guidance (GLVIA, Landscape Character Assessment) and local context (e.g., National Character Areas, Conservation Areas, flood zones, biodiversity zones), with recommendations for design criteria, mitigation, and environmental improvements.

5.3.6 Settlement Role and Function Study: The main purpose of the Settlement Role and Function Study is to build up a picture of the settlements in Cotswold District, and how they relate to each other – their role and function. The study presents information across the themes of population and settlement size; employment and economic activity and community facilities/services. The conclusion outlines the role and function of the district's 49 largest settlements, recommending a hierarchy of Principal Settlements, Non-Principal Settlements and Rural Settlements for the Council's Local Plan Update.

5.3.7 Integrated Impact Assessment: The aim of the Integrated Impact Assessment Report, in accordance with regulatory requirements, is essentially to present an appraisal of "the plan and reasonable alternatives" and "an outline of the reasons for selecting the alternatives dealt with".



5.3.8 Habitats Regulation Assessment: The aim of the Habitats Regulations Assessment at Regulation 18 consultation is to ensure that the planning process is aligned with the conservation objectives of European sites. The Habitats Regulations Assessment process involves assessing the potential effects of a plan or project against the nature conservation objectives of any site designated for its nature conservation importance. This includes evaluating whether the plan is likely to have a significant effect on a European site, either alone or in combination with other plans and projects. The Habitats Regulations Assessment process is based on the precautionary principle, where uncertainty about the potential effects should be assumed.

6. Communications

- 6.1** Messaging will be clear that the Council cannot control the number of houses that the Government has identified are needed in the district. Furthermore, the numbers of houses being consulted on are **indicative** at this stage and are subject to change following further assessment work and the Call for Sites, which is being undertaken alongside this consultation.
- 6.2** A two-part Communications Strategy and Plan has been developed to manage communications. This is based on the Council's adopted Statement of Community Involvement (SCI)², which explains how and when different groups, organisations and communities can get involved with the local plan and planning documents. It provides a framework for how to maximise community engagement in the consultation.
- 6.3** Communications will focus on key themes/issues that impact different groups, showing them how the Plan impacts them. The target audiences are in line with those required to be consulted under the SCI and include statutory stakeholders; general consultation bodies (e.g. community groups, residents' associations); local residents and businesses, neighbouring authorities; Parish and Town councils; and hard-to-reach groups.
- 6.4** Communication will involve several methods including:
- A dedicated consultation platform with interactive maps and documents.

² Cotswold District Council [Statement of Community Involvement](#) (January 2024)



- Online surveys and comment forms.
- Email and postal notifications to registered stakeholders.
- Social media campaigns (Facebook, LinkedIn, X/Twitter, Nextdoor).
- Press releases and local media coverage including a hard-copy newsletter landing on doorsteps, mid-November with the Local Plan consultation very prominent within it.
- Printed materials in libraries, council offices, and parish councils.
- Face to face events and an online town and parish council forum.

7. Other Documents to be Consulted Upon in the Future

7.1 It is also proposed to seek public feedback on further Local Plan evidence base documents in the future, as and when they are completed, such as an updated Gypsy and Traveller Accommodation Assessment, a Town Centre Study, and a Housing and Economic Needs Assessment. These will identify the need for gypsy and traveller accommodation, retail and other town centre uses, employment uses, as well as the types, sizes and tenures of housing needed. Given the technical nature of these documents, delegated authority is sought to request public feedback on these evidence base documents separately to this Regulation 18 consultation. Notification would be sent to all key consultees including key stakeholders, town and parish councils and those on the local plan database. The documents would be available to view online, and feedback would be sought via a response form.

8. The Local Development Scheme

- 8.1** All local planning authorities are required by law to prepare a Local Development Scheme. The Local Development Scheme explains what planning policy documents the council already has in place and the planning policy documents it will prepare in the future. It must also include the timetable for producing these documents.
- 8.2** National policy expects councils to review and update their Local Development Scheme at least annually, although it may need updating more frequently if there are any significant changes in the timescales or the plans being prepared.
- 8.3** The Council last updated its Local Development Scheme in March 2025 following the Deputy Prime Minister requesting that all local planning authorities produce an



updated Local Development Scheme within 12 weeks of the publication of the revised NPPF in December 2024.

8.4 The updated Local Development Scheme includes the following timescales:

- Consultation: Preferred Options (Regulation 18) – autumn 2025
- Consultation: Technical documents (Regulation 18) – winter/spring 2026
- Consultation: Publication of pre-submission draft Local Plan (Regulation 19) – summer 2026
- Submission of pre-submission draft Local Plan (Regulation 22) – winter 2026
- Examination – spring 2027
- Adoption – winter 2027

8.5 The Community Infrastructure Levy will be updated alongside the Local Plan. This will include the following stages:

- Draft charging schedule consultation – summer 2026
- Submission – winter 2026
- Examination – summer 2027
- Adoption – winter 2027

9. ALTERNATIVE OPTIONS

9.1 As noted, the report to Council in July 2025 provided for a high level Regulation 18 consultation on the Broad Locations Study. The Broad Locations Study has now been completed and has shown no obvious locations for development and recommends further assessment of all potential areas for development. Given the lack of conclusions in this document, there would be nothing tangible to consult on. Further, the Council has received advice from both PAS and the Planning Inspectorate to consult on the proposed areas for development prior to the Regulation 19 stage. This is therefore the proposed strategy.

The Council is required to have an up-to-date Local Development Scheme. Following the Council's decision in July 2025 to progress a Full Local Plan Review for submission in December 2026, the Council is required to update the Local Development Scheme and publish it on its website. A legal test of soundness is that the Council has an up-to-date Local Development Scheme on submission of its Local



Plan to the Secretary of State for examination. There is therefore no alternative to this option.

10. CONCLUSIONS

- 1.1.** This report recommends that the Council progress to its Regulation 18 Consultation on its Preferred Options for the Local Plan Review. All of the responses from the consultation will be reviewed and where appropriate inform the site selection process and in turn the draft Local Plan which will be consulted on in Summer 2026.
- 10.1** The report also recommends the approval of the updated Local Development Scheme for publication in accordance with regulations. These recommendations accord with the Council's decision in July 2025 to progress the Plan to submission in December 2026.

11. FINANCIAL IMPLICATIONS

- 11.1** The Council has set aside a local plan reserve to provide for costs arising from the Local Plan. This provides for £15,000 to fund the costs of this consultation; and will include costs for exhibition materials, refreshments, and printing.

12. LEGAL IMPLICATIONS

- 12.1** It is a statutory requirement for the Council to produce a Local Plan and keep it up to date. Local Plans, prepared by a local planning authority in consultation with its community, set out a vision and framework for the future development of an area. Once in place, Local Plans become part of the statutory development plan. The statutory development plan for the area is the starting point for determining local planning applications.
- 12.2** The Government has made clear the intention to make rapid progress towards universal local plan coverage both through support and using Government's powers of intervention when needed. Within the new planning reforms, the Government introduced new powers for government intervention where progress on local plans is not being made, bringing in government officers and attributing the bill to the council in question.
- 12.3** The preparation of a Local Development Scheme is a requirement of the Planning and Compulsory Purchase Act 2004 (as amended). This must specify (among other matters) the development plan documents (i.e. local plans) which, when prepared,



will comprise part of the development plan for the area. The Local Development Scheme must be made available publicly and kept up-to-date. It is important that local communities and interested parties can keep track of progress. Local planning authorities should publish their Local Development Scheme on their website.

13. RISK ASSESSMENT

- 13.1** The Regulation 18 consultation may result in a large number of responses which may cause resourcing issues for the team. A growth bid has been approved to increase the resources for the Policy Team which is part of a broader restructure, and this is currently going through consultation; but these resources may take time to put in place. The Council has therefore recruited contractors to provide support and therefore mitigate this risk whilst more permanent resources are sought and put in place.
- 13.2** The Council may receive unresolvable objections from major stakeholders; early engagement will therefore be sought to resolve such issues as soon as possible.

14. EQUALITIES IMPACT

- 14.1** The emerging Local Plan is supported by an Integrated Impact Assessment that considers these legal duties and requirements. An updated Integrated Impact Assessment will be available to review and comment on during the public consultation.

15. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

- 15.1** Delivering a Local Plan that is green to the core is a corporate priority in the Council's efforts to tackle the climate change and ecological emergencies and the draft plan policies take account of this.

16. BACKGROUND PAPERS

- 16.1** The following papers have been consulted for background information in preparation for this report:
- Cotswold District Council's Statement of Community Involvement [Statement of Community Involvement](#)



COTSWOLD
District Council

- Cotswolds District Council Local Development Scheme. [Local Development Scheme January 2024](#)

16.2 These documents will be available for inspection online at www.cotswold.gov.uk or by contacting democratic services democratic@cotswold.gov.uk for a period of up to 4 years from the date of the meeting.

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Cotswold District Council
Local Plan Review
Regulation 18 Consultation
Preferred Options
November 2025

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1. Introduction

What is a Local Plan?

- 1.1 A Local Plan is a statutory document created by a local planning authority that sets out policies and proposals for development in a specific area such as a district council area, guiding decisions on planning applications including for new housing, employment, shops, and infrastructure. The Local Plan provides a long-term vision for the future of the area, outlining where growth should occur and where development should be restricted, and serves as the starting point for determining planning applications.
- 1.2 The process of updating a Local Plan involves several stages. The initial stages involve looking at issues, options and policy proposals with stakeholders, including the public (formally known as a Regulation 18 stage). This is followed by a draft Local Plan (formally known as a Regulation 19 stage). The next step is then an Examination in Public where an independent Inspector appointed by the Planning Inspectorate assesses the soundness and legal compliance of the Plan and considers representations made in response to the Regulation 19 consultation. At each stage there is an opportunity for stakeholders to participate in the process and have their views heard. If the Plan is found sound and approved by the Planning Inspector, it is then adopted by the Local Authority and replaces the previous Local Plan to become the Development Plan for the area.
- 1.3 The Council encourages everyone to participate in the consultation to help inform the next stage of the Local Plan process, whether you are a resident, business, landowner, town or parish council or anyone else. In taking part in the discussion, it is important to bear in mind the last step of the process – the Examination in Public. The Inspector will be focusing on whether the Local Plan is sound, and one key consideration for the Inspector will be whether there is sufficient evidence to support the proposals. If you do suggest new alternative policy suggestions, please remember that if we take them on board, we need to be confident we can robustly and justifiably support them when the Local Plan is examined.

What has been consulted on already and what has changed since then?

- 1.4 Cotswold District Council commenced a Development Strategy and Site Allocations Plan in January 2024. This included a new Local Plan period of 2026 to 2041. As the first stage of preparing this Local Plan, the Council consulted on a Vision, Objectives and Development Strategy Options Topic Paper between February and March 2024. At the same time, the Council also consulted on a series of amended and new policies in order to make the Local Plan 'Green to the Core'.

- 1.5 At the time of these consultations, the government calculated that the district needed to deliver 493 additional homes a year. Accordingly, it was estimated that additional sites capable of delivering around 3,300 homes would be needed to deliver the full housing target over the new Local Plan period. Various development strategy options were identified to deliver the housing target, and feedback was sought on those options.
- 1.6 In December 2024, the Government revised the National Planning Policy Framework. The changes included a new, mandatory 'standard methodology' for calculating the number of homes needed in each local planning authority area. As a result, and largely due to high house prices in Cotswold District which demonstrate the demand for housing in the area, the district received a more than 100% increase to its annual housing target. The number of homes needed in the district is now calculated to be 1,036 homes a year, which means significantly more housing sites need to be identified.
- 1.7 National planning policy has a separate requirement for councils to demonstrate that they have enough land available to meet their housing needs for the next five years. This is known as the "five-year housing land supply." It ensures that local plans are delivering their housing target. If a council cannot show that it has this supply in place, national policy gives greater weight to approving planning applications for new housing, even if they do not fully align with local policies. The significant increase to the district's housing target meant the Council lost its five year housing land supply. This change has reduced the Council's ability to refuse planning applications for new homes, even in areas that were previously seen as unsuitable for development.
- 1.8 Planning applications are consequently now also being decided one by one, without a joined-up approach. This means there's no overall plan guiding where new homes should go, and infrastructure like roads, schools, and health services may not be properly planned or provided alongside new development.
- 1.9 National planning policy also requires Local Plans to look ahead for a minimum of 15 years from the point of adoption and policies should be set within a vision that looks ahead at least 30 years. With an expected adoption of the Local Plan Update in 2027, the plan will need to run to 2043. This further increases the number of homes that need to be planned for.

- 1.10 In this current Regulation 18 stage consultation, the Council is putting forward its proposed development strategy. This strategy will dictate how and where any land for additional development that is needed to meet identified requirements to 2043 should be allocated. This includes broad areas of the district where growth in, for example, housing and employment provision may take place. The identification of specific development sites will follow in the Regulation 19 consultation next year.
- 1.11 The responses from the previous Local Plan consultations are still valid and have been taken into consideration. However, the significant increase to the number of homes needed in the district requires a rethink of the proposed development strategy for delivering this scale of growth.

How can I comment on this consultation?

- 1.12 The consultation documents can be accessed via the Council's online consultation system your.cotswold.gov.uk. Hard copies are also available to view at all public libraries in Cotswold District, as well as the Council offices at Trinity Road, Cirencester, GL7 1PX and the Moreton Area Centre, High Street, Moreton-in-Marsh, GL56 0AZ. Hard copies can also be obtained on request by contacting the Council's customer services team on 01285 623000 or customer.services@cotswold.gov.uk. Please note charges may apply.
- 1.13 Please respond using the online consultation system [LINK](#). The Council has also produced guidance [LINK](#) as well as a video [LINK](#) explaining how to make your comments. You can respond to as many or as few questions as you wish. If you do not have access to a computer or smartphone and have to make your submission by letter or email, please ensure to clearly state for each of your comments which section/paragraph of the consultation they relate to; this ensures that your comments are processed swiftly and correctly.
- 1.14 Please note that consultation responses will be refined down to a list of [material planning considerations](#)¹, the Council cannot take into account other matters. Campaigns making multiple representations on the same point carry no extra planning weight than a single representation making the same point(s).

¹ Material planning considerations are factors that must be taken into account when making planning decisions. Key considerations include:

- Privacy: Overlooking or loss of privacy for neighbouring properties.
- Daylight and Sunlight: Potential loss of daylight or overshadowing.
- Scale and Design: The scale, dominance, and appearance of proposed developments.
- Access and Safety: Considerations for disabled access, highway safety, and traffic issues.
- Planning Policies: Compliance with relevant planning policies and legislation.

- 1.15 This consultation lasts a period of six weeks starting from Wednesday 5 November 2025. It will close on Thursday 18 December 2025 at midnight. Please ensure your representations are submitted by this deadline. Unless there are mitigating circumstances, we will not accept late representations because this will affect the overall Local Plan timetable, as well as being unfair to those who have adhered to the deadline.
- 1.16 For further information about the Council's Local Plan consultation process and the next steps in the Local Plan process, please see [our Statement of Community Involvement and our Local Development Scheme](#). The Local Plans team can be reached via Local.plan@cotswold.gov.uk or Planning Policy, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

2. Spatial Strategy Options

Context

- 2.1 The development strategy of the Local Plan identifies the requirements for different types of development (housing, employment, retail, etc) over the proposed new Local Plan period (2025 to 2043). It is also a 'spatial document' which sets out how and where the development requirements will be delivered. This section of the consultation sets out the different options that the Council has considered and the Council's preferred option. A more detailed analysis of the different options can be found Development Strategy Options Technical Report [LINK](#).
- 2.2 Based on current estimations, the following housing targets will apply for the updated local plan:
- a. 18,650 additional new homes are needed for the new local plan period (calculated using the government's 'standard methodology').
 - b. There are already 6,150 homes in the pipeline that can contribute towards delivering this 18,650 housing target. These are:
 - planning permissions that have not yet been built;
 - remaining site allocations from the current Local Plan; and
 - future windfalls (an estimation of sites that will not specifically be identified in the Local Plan).
 - c. Additional sites capable of delivering 12,500 homes are needed to fully deliver the housing target (i.e. $18,650 - 6,150 = 12,500$ homes).
- 2.3 Local planning authorities must use their housing target, as calculated by the standard methodology, as the starting point for determining the housing requirement included in their Local Plan. However, there may be matters that necessitate a lower housing requirement, such as protected areas or assets of particular importance providing a strong reason for restricting the overall scale, type or distribution of development in the plan area.
- 2.4 If there are insufficient deliverable / developable sites and the full development needs cannot be delivered inside the district, the Council would need to ask neighbouring authorities whether they can accommodate some of the unmet need. The Council would then set a housing requirement in its Local Plan that is lower than the number of homes that is needed, but that matches the deliverable / developable housing land supply. A similar situation exists for the need for other types of development (such as employment and retail) that cannot be fully delivered in the district.

The different scenarios

- 2.5 Seven development strategy options have been identified to accommodate the additional growth. A detailed analysis of the strengths and weaknesses of each of these scenarios can be found in the Development Options Strategy Technical Report [LINK](#). The potential impacts of each scenario have also been assessed in the Integrated Impact Assessment [LINK](#) and the Habitat Regulations Assessment [LINK](#). You can put your comments against any of the scenarios and/or answer the two questions at the end of this section.

Scenario 1: Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters and support Rural Exception Sites in Rural Settlements

- 2.5.1 This scenario would be a continuation of the current development strategy which focusses the majority of additional growth at Principal Settlements. In addition, this scenario would also identify the Non-Principal Settlements and Village Clusters as locations to proactively allocate sites for development.
- 2.5.2 A Settlement Role and Function Study [LINK](#) was undertaken to determine a settlement hierarchy of Principal Settlements, Non-Principal Settlements (and Village Clusters) and Rural Settlements based on various factors, such as their existing size, level of services, facilities, employment provision, etc.

16 Principal Settlements			
Andoversford	Cirencester	Mickleton	South Cerney
Blockley	Fairford	Moreton-in-Marsh	Stow-on-the-Wold
Bourton-on-the-Water	Kemble	Northleach	Tetbury
Chipping Campden	Lechlade	Siddington	Upper Rissington
13 Non-Principal Settlements or Village Clusters			
Avening	Broadwell	North Cerney	The Village Cluster of Coln St Aldwyns, Hatherop and Quenington
Bibury	Down Ampney	Poultton	
Bledington	Longborough	Preston	
Bourton-in-the-Hill	Meysey Hampton	Willersey	

- 2.5.3 The final settlement hierarchy in the Local Plan may change, as it will factor in the amount of additional planned growth and any additional services, facilities, employment provision, etc. resulting from that growth.
- 2.5.4 Additional housing would be supported in Rural Settlements as Rural Exception Sites. These developments would normally not be permitted but

would aim to provide 100% affordable housing and meet a local housing need. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding. These homes would be delivered as windfalls (i.e. sites not specifically identified in the Local Plan). Further housing would be supported as windfalls beyond the Principal and Non-Principal Settlements and Village Clusters where other national, local and neighbourhood planning policies allow it.

- 2.5.5 The total housing supply of the Local Plan period from Scenario 1 is estimated to be approximately **7,840 homes. This is 42% of the government target of 18,650 homes.**

Scenario 2: Allocate sites in Principal Settlements, Non-Principal Settlements, Village Clusters and Rural Settlements

- 2.5.6 This scenario incorporates Scenario 1 but adds a more 'dispersed' approach to the future pattern of development so that instead of growth being steered mainly towards the district's Principal and Non-Principal Settlements, it would also be located within small villages and hamlets across the district. The Rural Settlements have very limited or no services, facilities or employment provision.
- 2.5.7 Many of the homes that would come forward in Rural Settlements from this scenario would either have been Rural Exception Sites or be included within the windfall allowance for Scenario 1. This means that the amount of houses that are gained by this scenario is limited.
- 2.5.8 The total housing supply of the Local Plan period from Scenario 2 is estimated to be approximately **8,230 homes. This is 44% of the government target of 18,650 homes.**

Scenario 3: Main Service Centre focus

- 2.5.9 Scenario 3 would focus the vast majority of future development (beyond existing commitments) at main service centres. These main service centres offer a broad range of services and facilities, good public transport accessibility and provide a mix of job opportunities. Some of the settlements with potential to be main services centres lie within the Cotswolds National

Landscape where the scale and extent of development is expected to be limited.

- 2.5.10 Under this scenario, proportionately less development (beyond existing commitments) would take place in Principal Settlements that are not Main Service Centres. These Principal Settlements would retain a development boundary, inside which the principle of development would continue to be supported. However, they would not receive any allocations for additional housing growth.
- 2.5.11 In simpler terms, compared to the previous scenarios, this scenario would put the majority of development near the largest settlements in the district. The total housing supply of the Local Plan period from Scenario 3 is estimated to be approximately **9,420 homes. This is 51% of the government target of 18,650 homes.**

Scenario 4: Focus growth around transport nodes

- 2.5.12 This scenario puts future growth (beyond existing commitments) along key public transport corridors and around public transport hubs (e.g. rail stations). It would see all future additional growth focused in locations where there are good current and potential future opportunities to use public transport
- 2.5.13 In terms of bus services, some parts of the District have a reasonably good level of service. However, coverage across much of the rest of the District, in particular more rural areas, is sporadic or even non-existent in some locations, particularly during off-peak periods.
- 2.5.14 In terms of rail services, Cotswold District has two railway stations. Kemble railway station serves the Golden Valley Line (London - Swindon - Cheltenham). Moreton-in-Marsh railway station serves the North Cotswold Line (London - Oxford - Worcester). Kingham railway station is located in West Oxfordshire District but serves the east of Cotswold District. This area is constrained by its location inside the Cotswold National Landscape.
- 2.5.15 The total housing supply of the Local Plan period from Scenario 4 is estimated to be approximately **9,190 homes. This is 49% of the government target of 18,650 homes.**

Scenario 5: Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters. Support Rural Exception Sites in Rural Settlements. Create new settlement(s) and/or strategic extensions to existing settlement(s)

- 2.5.16 National policy recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).
- 2.5.17 This option would include the development set out in Scenario 1 as well as new settlements and/or strategic extensions to existing settlements. As a minimum, settlements with strategic growth would (grow to) include all the services, facilities, employment provision and accessibility standards found within a Non-Principal Settlement.
- 2.5.18 Delivering a new settlement or strategic site has a long lead in time from conception of the idea to the first spade being put in the ground. These locations would therefore be expected to deliver housing and other types of development towards the mid to end of the new Local Plan period and would also likely continue delivering into the next Local Plan period.
- 2.5.19 As there is a presumption against major development taking place within the Cotswolds National Landscape other than in exceptional circumstances and development being in the public interest, any new settlement or strategic site would need to be located outside of this area.
- 2.5.20 The total housing land supply of the Local Plan period from Scenario 5 is estimated to be approximately **14,660 homes. This is 79% government target of 18,650 homes.**

Scenario 6: Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters. Support Rural Exception Sites in Rural Settlements. Create new settlement(s) and/or strategic extensions to existing settlement(s). Support major development within the Cotswold National Landscape

- 2.5.21 Scenario 6 retains all strategic sites and settlement growth identified in Scenario 3. But unlike Scenario 3, it includes sites within the Cotswold National Landscape, irrespective of whether they constitute major development or have high landscape sensitivity.

2.5.22 This scenario is intended to test the upper limits of potential growth across the district, including areas that are subject to greater planning constraints due to their landscape designation. National landscapes have the highest status of national policy protection. Major development within them should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. **Given this option is contrary to national planning policy, scenario 6 is not considered to be a viable option.**

2.5.23 The total housing land supply of the Local Plan period from Scenario 6 is estimated to be approximately **19,320 homes. This is 104% of the government target of 18,650 homes.**

Scenario 7: Maximise growth across the district with sites assessed to be unsuitable for development (for example, via additional new settlement(s) / strategic extensions)

2.5.24 Scenario 7 tests a further theoretical housing capacity across Cotswold District by combining all elements of previous growth scenarios (excluding Scenario 6). In other words, it includes all of the development proposed in the scenarios 1 to 5, with the addition of new settlements and/or strategic extensions (outside of the National Landscape) in locations that have been assessed to be unsuitable for development.

2.5.25 As with scenario 6, **the Council does not consider this to be a sustainable level of development and therefore scenario 7 is not a viable option.**

2.5.26 The total housing land supply of the Local Plan period from Scenario 6 is estimated to be approximately **16,200 homes. This is 87% of the government target of 18,650 homes.**

2.6 As scenarios 6 and 7 are excluded for not delivering sustainable growth, only five scenarios remain. None of these remaining scenarios provide a housing land supply that meets the target of 18,650 new homes set by the government. Therefore, the Council will need to ask if neighbouring authorities could contribute to the delivery of the residual housing need whichever of the first five scenarios is chosen. The Council could only set a housing target in its Local Plan that is lower than the one set by the government if neighbouring authorities are unable to contribute to delivering the shortfall in full.

Increasing density

- 2.7 National policy recognises that where land for housing is limited, it is important to make the best use of available space. This means building homes at higher densities – especially in town centres and areas with good public transport links – so more people can be housed. National policy therefore requires local plans to include clear policies to support this, and developers are expected to use land efficiently.
- 2.8 National policy also emphasises the importance of creating sustainable places of high quality design, conserving and enhancing our national landscape and building houses to meet the needs of our communities. A balance therefore must be struck between maximising density, whilst also ensuring the character and scenic beauty of the Cotswolds and the wider district is retained, as well as providing the right types and sizes of homes that are needed.
- 2.9 In Cotswold District, the number of homes on potential development sites is currently calculated using 30 dwellings per hectare with a lower portion on larger sites for providing for other things, such as public green space. One way to help meet our housing target may be to increase the density of homes provided on each site. This would deliver more housing units but would mean building up, more compactly, and/or reducing the level of private and shared open space.

Table 1 – Percentage density increase required to deliver 18,650 homes

Indicative total housing delivery	Percentage density increase required to deliver 18,650 homes	Dwellings per hectare required to deliver 18,650 homes
Scenario 1 = 7,840	138%	71
Scenario 2 = 8,230	127%	68
Scenario 3 = 9,420	98%	59
Scenario 4 = 9,190	103%	61
Scenario 5 = 14,660	27%	38
Scenario 6 = 19,330	N/A	N/A
Scenario 7 = 16,200	15%	35

- 2.10 In a rural district like Cotswold, where the character of towns and villages is shaped by historic buildings, open spaces, and protected landscapes, achieving higher density development is extremely challenging. It may require taller buildings or more intensive layouts that could conflict with conservation areas, heritage settings, and the natural beauty of the Cotswolds National Landscape. Additionally, delivering the right mix of homes, such as family houses, accessible homes and affordable housing with the right space standards, can be harder at higher densities, where space is more limited and

design flexibility is reduced. Whilst increasing density in some locations may be possible, there are likely to be many areas where this is not possible – e.g. rural edge of settlement locations with small to medium sized sites – due to the impact on the character of the surrounding area.

The Council's preferred option

- 2.11 The Council's preferred development strategy is scenario 5 as it builds on the current adopted strategy which has successfully delivered the development needs of the adopted Local Plan period until the introduction of the new housing target in December 2024. It ensures that the creation of new homes, employment and infrastructure is targeted in the most sustainable locations for development with the best services, facilities, employment opportunities and transport connectivity.
- 2.12 On top of the existing strategy, scenario 5 also includes the creation of new settlement(s) and/or new strategic site(s). This ensures that the Council can evidence it has looked at all options to reach the housing target of 18,650 new dwellings. **However, it is important to note that at this stage the figures are indicative.** Chapter three of this consultation document includes indicative figures and maps that show what this scenario might look like in practice.
- 2.13 The Council will maximise higher housing density development where possible, which may help to bridge the gap between the indicative capacity of scenario 5 and the delivery of the full housing target. However, this approach will be difficult to achieve in much of the district, where the landscape, conservation areas, and historic character of settlements place constraints on building height and layout. A density of 38 dwellings per hectare is similar to that of Brighton or Nottingham, which have terraced housing, townhouse, low-rise flats (2–3 storeys), and limited private gardens, and is out of character with much of the district in locations where land is available for development. Such a density of development can also make it harder to deliver the required mix of housing types, which are important for meeting the needs of all residents.
- 2.14 Scenario 5 is preferable over the other scenarios as it provides a housing land supply with the highest percentage of the government's housing target (79%). It is unlikely that the other scenarios would be accepted as the Council's strategy by an independent Inspector at the Examination in Public when scenario 5 can deliver the most housing in a sustainable way (subject to further assessment).

Questions

- Which of the above scenarios has your preference? Why do you prefer this option?
- Should the Council consider locating development in unsustainable locations to meet the government housing target? Please explain.
- To what extent would you support increasing housing density in developments (such as smaller houses and gardens, more flats or higher buildings) to help meet the full housing target? Please also explain why.

3. Indicative figures

Context

- 3.1 To deliver the housing target, the Council will need to evidence that it has a sufficient supply of available sites that can be delivered both within five years and for the rest of the plan period. To find suitable sites, amongst other things, the Council has undertaken several 'Calls for Sites' allowing landowners, developers and members of the public to put forward potential sites for development.
- 3.2 The Council has also undertaken an Assessment of Broad Strategic Development Locations [LINK](#) which assesses the suitability of broad locations for strategic development (developments of five hundred or more homes). The study found no 'obvious' sites that could be readily developed. However, it has identified areas that require further detailed assessment (in terms of mitigating constraints etc.) to determine their suitability and the level of development that could occur (if any).
- 3.3 Alongside this consultation, the Council is running another Call for Sites with a specific focus on the areas that have been identified as having potential for further investigation in the Assessment of Broad Strategic Development Locations and within and surrounding settlements identified by the proposed Local Plan Development Strategy. More information on this Call for Sites can be found in Chapter 6.

How did the Council select locations?

- 3.4 Many sites are submitted to the Council as potential land for development, whereas further assessment is required to confirm the deliverability of other sites. There can be various reasons why a site is undeliverable, such as it not being available for development. Sites may also be unsuitable for development, for example, because of flood zones, impacts on landscape, protected habitats, historic buildings etc., as well as the sustainability and accessibility of sites.
- 3.5 All submitted sites go through a site selection process which applies a series of filters to progressively identify which sites should be rejected and which should be recommended for allocation. A comprehensive explanation of each of these filters can be found in the Site Allocation Selection Methodology [LINK](#).

Indicative Figures

- 3.6 Based on the sites currently being assessed, the Council has provided a high level **indication** of the location and level of new development that could be expected in each settlement or location identified in the preferred Local Plan Development Strategy. **These high level figures are based on current planning permissions / allocations, windfalls and further sites that have been put forward and identified as potentially deliverable.**
- 3.7 It is important to note that **these numbers are indicative** of the number of new homes proposed for each settlement or location over the whole local plan period; they are in different stages of assessment and **further work is needed to determine the sustainability and viability of the sites. This may result in sites being discounted which would then result in a reduction of homes proposed for a settlement or location.**
- 3.8 Furthermore, additional land is expected to be submitted through the Call for Sites campaign, which may increase the number of homes or the type of development to be proposed in a settlement or location.
- 3.9 It is also important to emphasise that **the selection of the development strategy options and sites at this Regulation 18 consultation stage is an iterative process.** The final development strategy and recommended sites for allocation in the Local Plan will form part of the pre-submission Local Plan, which will undergo a further public consultation in summer 2026 (formally known as a Regulation 19 consultation).
- 3.10 Given the scale of the housing target, it is likely that **all deliverable and developable sites in sustainable locations for growth will likely need to be allocated for development in the Local Plan.** Settlements may therefore receive disproportionately more development than others – e.g. settlements outside the Cotswolds National Landscape will normally be expected to receive more development than those inside the Cotswolds National Landscape. Where new strategic growth is planned (i.e. sites of 500 or more homes), the location will be expected (to grow) to include the level of services and facilities of a Non-Principal Settlement as a minimum.
- 3.11 The total estimate of 14,660 homes from scenario 5 would provide a housing land supply that is 79% of the 18,650 housing target calculated using the government's 'standard methodology'. However, because the district will likely fall short of delivering its housing target, national rules will consequently require the Council to plan for more homes than are actually needed, just to make sure enough get built. For example, the

adopted Local Plan had a minimum requirement for 8,400 homes but included a housing land supply of around 9,600 homes in case any sites were delayed or were not built. This proved to be needed, as the delivery of The Steadings in Cirencester – a large site including 2,350 homes and other development – was delayed. Scenario 5 relies on the delivery of eight similar large sites of 500 or more homes. Large sites can be difficult to deliver and are often delayed, so scenario 5 has a higher risk of not delivering housing on time.

- 3.12 There are also challenges in providing some infrastructure, for example, the water supply and wastewater treatment infrastructure needed to support new housing. Much of the area is already under pressure for water supply, and some sewage treatment facilities need upgrading. Thames Water, the company responsible for most of the district, is facing financial difficulties, which may delay these improvements. As a result, some housing developments may be held back until the necessary infrastructure is in place. Although scenario 5 plans around 14,660 homes, not all are likely to be built on time. Realistically, around 20% fewer homes may be delivered during the Local Plan period, meaning only about 11,730 homes are expected.
- 3.13 The Council will need to ask neighbouring authorities whether they could accommodate some of the unmet need. The Council would then set a housing requirement in its Local Plan that shows the amount of housing that could be delivered in the Cotswold District and what, if any, that could be delivered in neighbouring authority areas. This may be lower than the number of homes that is needed, but that matches the deliverable / developable housing land supply.
- 3.14 Without the allocation of these sites, the Council will be unable to set its housing requirement in the Local Plan and evidence it has a sufficient supply of deliverable / developable sites. However, this does not mean that development will not happen in these locations. On the contrary, the Council will have less power to require developers to deliver all the necessary infrastructure needed to support these developments. The Council will also be unable to stop development occurring in less suitable locations if developers can evidence that their development is in line with national planning policies as the Council would not have an up to date Local Plan with allocated sites.
- 3.15 Moreton-in-Marsh was identified in the previous Regulation 18 consultation as a potential location for strategic development. The Council commissioned external consultant WSP to undertake a feasibility study of strategic development in the town and it is currently awaiting the first part of this study, which is expected to be completed later this year.

Table 2 – Illustrative numbers of houses delivered by the Council's proposed Development Strategy including current planning permissions and site allocations

Proposed Principal Settlements	Current dwellings	New dwellings	Proposed Non-Principal Settlements	Current dwellings	New dwellings	Other Potential New Settlements and Strategic Sites	New dwellings
Andoversford	307	130	Avening	412	70	Strategic extension north of Ampney Crucis	660
Blockley	616	130	Bibury	190	40	Strategic extension south of The Steadings, Cirencester	400
Bourton-on-the-Water	1,936	230	Bledington	208	10	New settlement near Driffield	840
Chipping Campden	1,154	230	Bourton-on-the-Hill	134	10	Strategic extension north-east of Fairford	780
Cirencester	9,900	2,820	Broadwell	150	20	Strategic extension south-west of Kemble	590
Fairford	1,800	470	Down Ampney	231	420	Strategic extension north, south and west of Moreton-in-Marsh	1,710
Kemble	388	30	Longborough	224	40	Strategic extension south of Preston	960
Lechlade-on-Thames	1,241	220	Meysey Hampton	179	0	Strategic extension north, south and west of Siddington	880
Mickleton	954	590	North Cerney	72	30	Total	6,820
Moreton-in-Marsh	2,663	420	Poulton	173	30		
Northleach	815	80	Preston	89	170	Other Housing Land Supply	
Siddington	339	30	Willersey	458	180	Other Rural Settlements and Open Countryside	780
South Cerney	1,318	110	The Cluster of Coln St Aldwyns, Hatherop and Quenington	352	80	District-wide planning permissions expected to lapse	-30
Stow-on-the-Wold	1,240	150	Total (rounded)	2,872	1,100	Total	750
Tetbury	3,257	320					
Upper Rissington	757	30					
Total (rounded)	28,685	5,990					
						Grand Total	14,660
						Government Housing Target	18,650

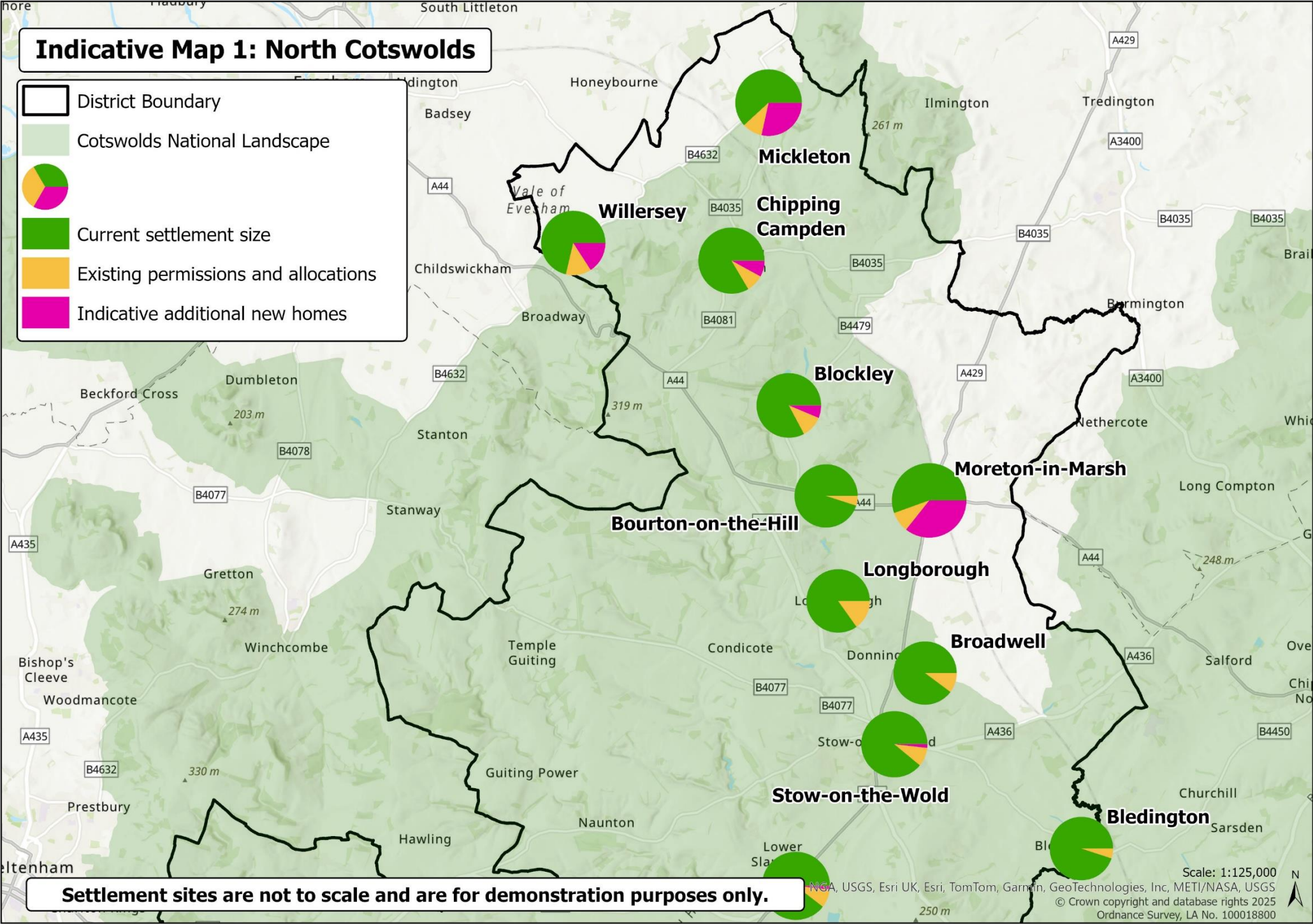
Note: The figure of 'Current Dwellings' refers to the settlement, not the whole parish.

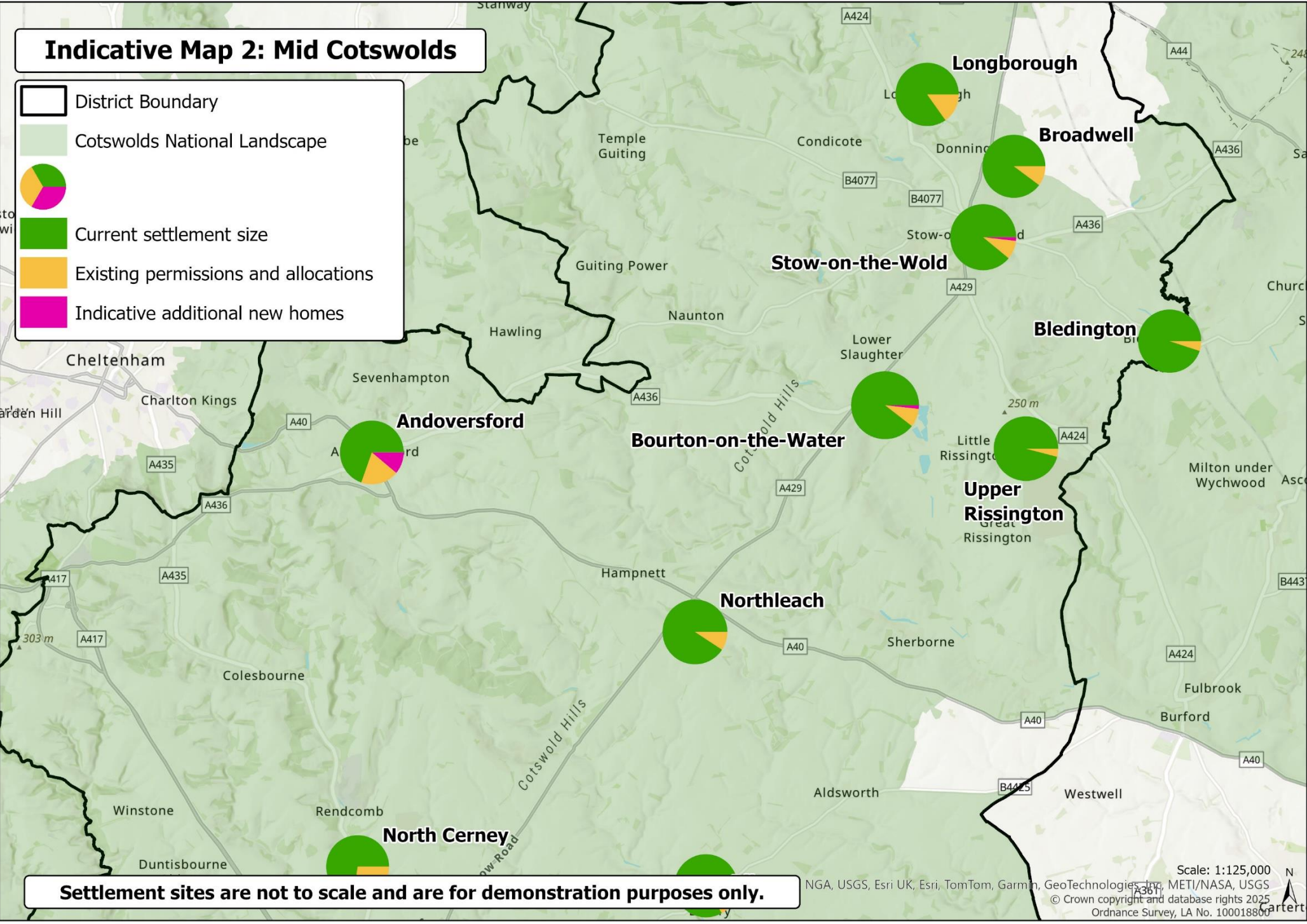
Indicative Maps

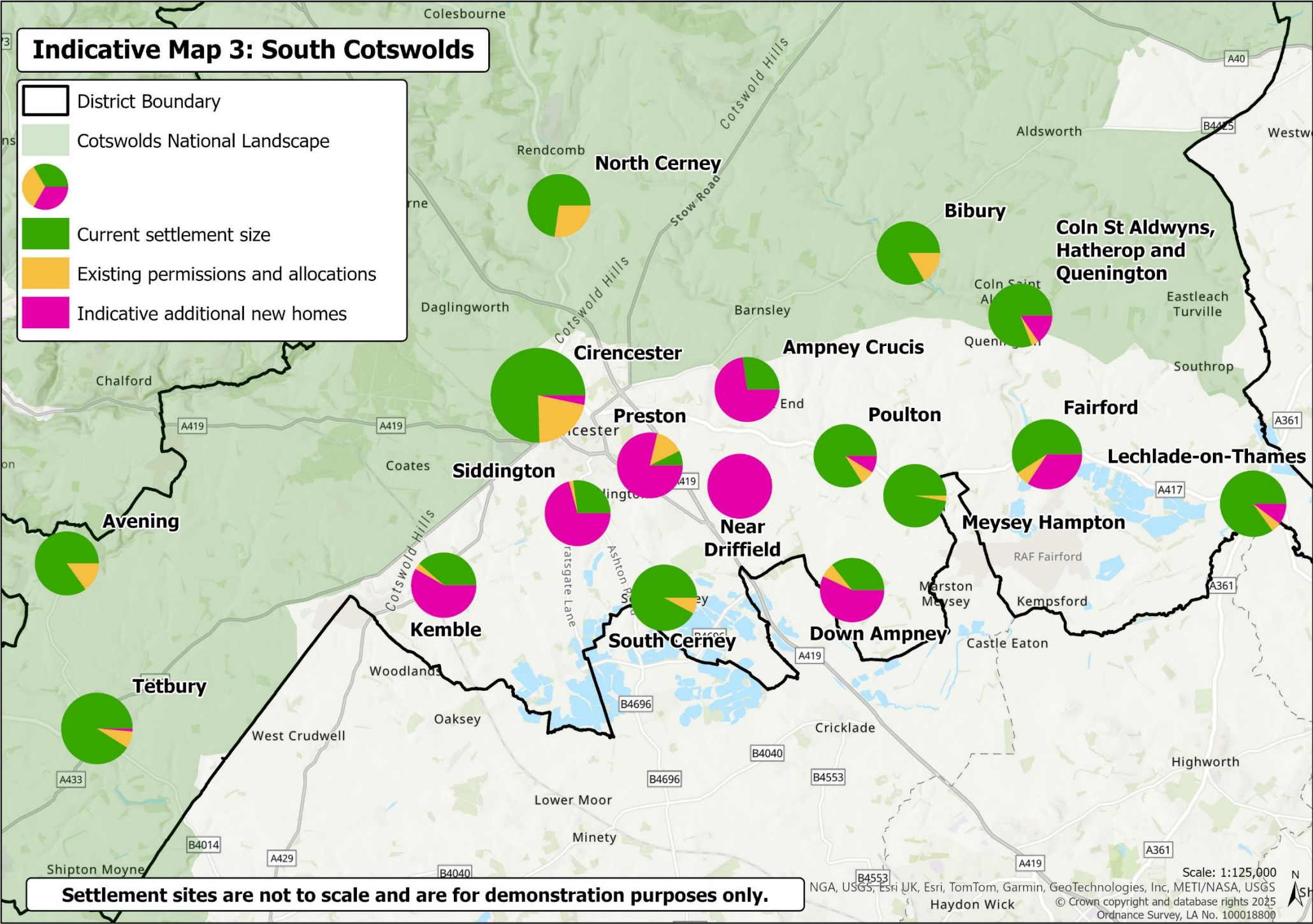
- 3.16 To assist with visualising the location and level of growth, the Council has also produced the maps below. The pie charts in maps 1 to 3 mark the likely location and level of new development. Each pie chart shows the current size of the settlement in green, the existing planning permissions and site allocations in yellow and the indicative amount of additional new homes in pink.
- 3.17 Map 4 gives a high level indication of the location of the potential new strategic sites. The arrows show which direction the settlements could potentially grow, based on areas that may be available for development. They are general indicators and the start and end points of the arrows do not denote specific locations nor the extent of the potential strategic site. Further investigation regarding coalescence and green buffers will need to be undertaken.

Question

Do you think the proposed level of development is sustainable? If not, what provisions would need to be added to the settlement to make them a sustainable location for the proposed level of development? These could be new services, facilities or the provision of infrastructure. Please clearly state which settlement(s) your comment relates to.



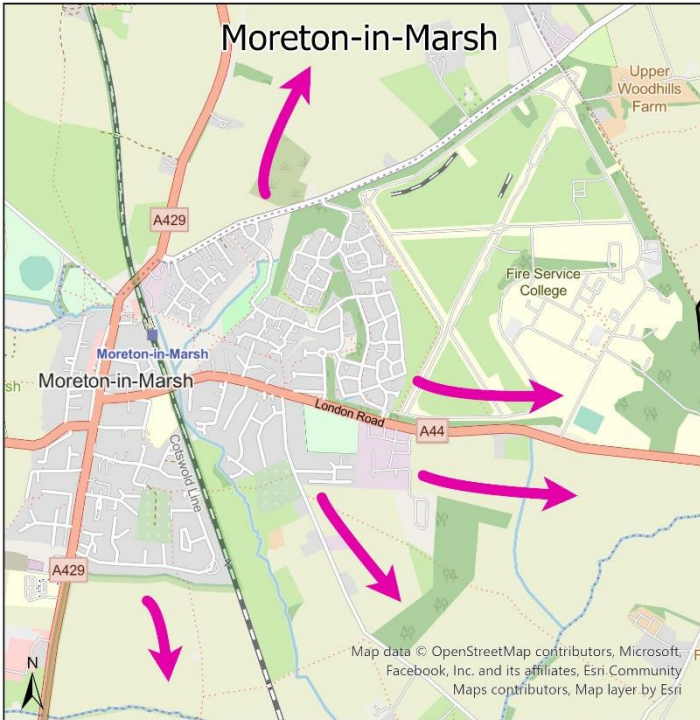




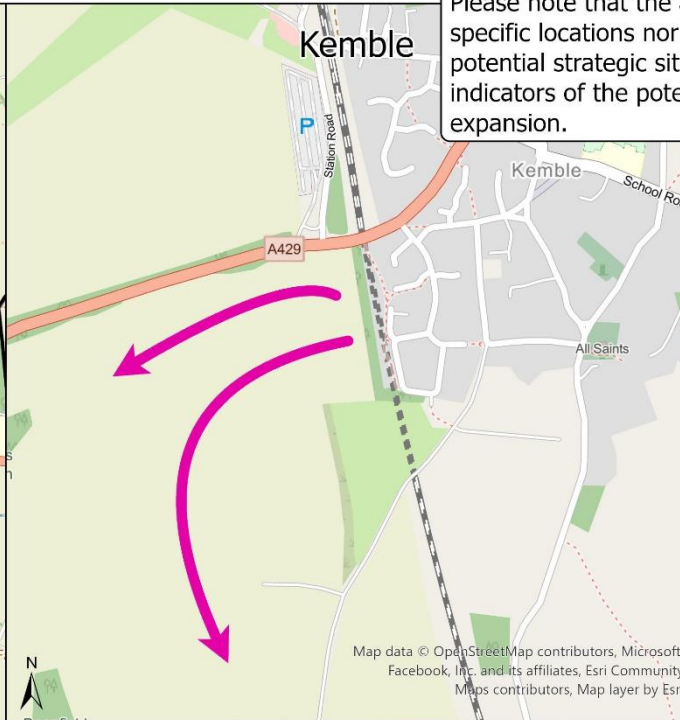
Indicative Map 4: Potential new settlements and strategic sites

Please note that the arrows do not mark specific locations nor the extend of the potential strategic site. They are general indicators of the potential direction of expansion.

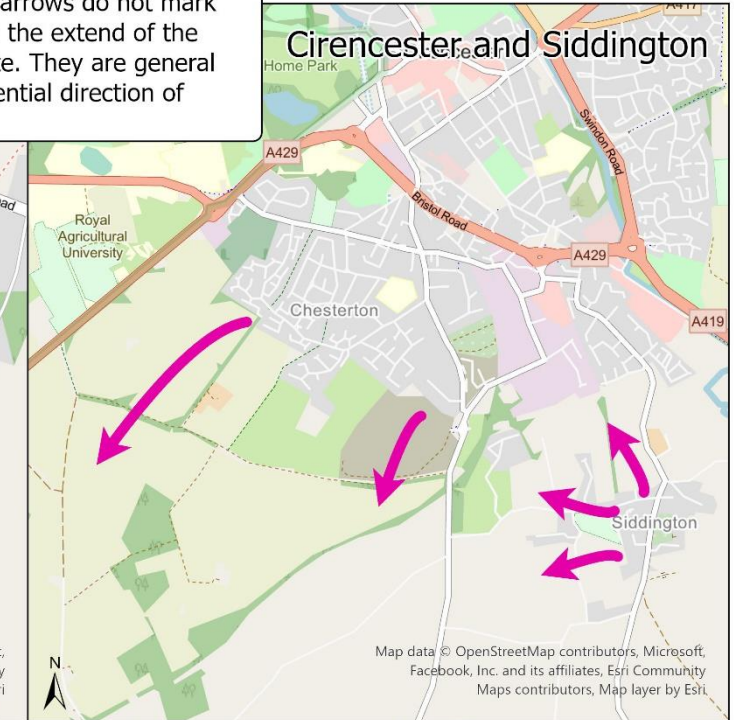
Moreton-in-Marsh



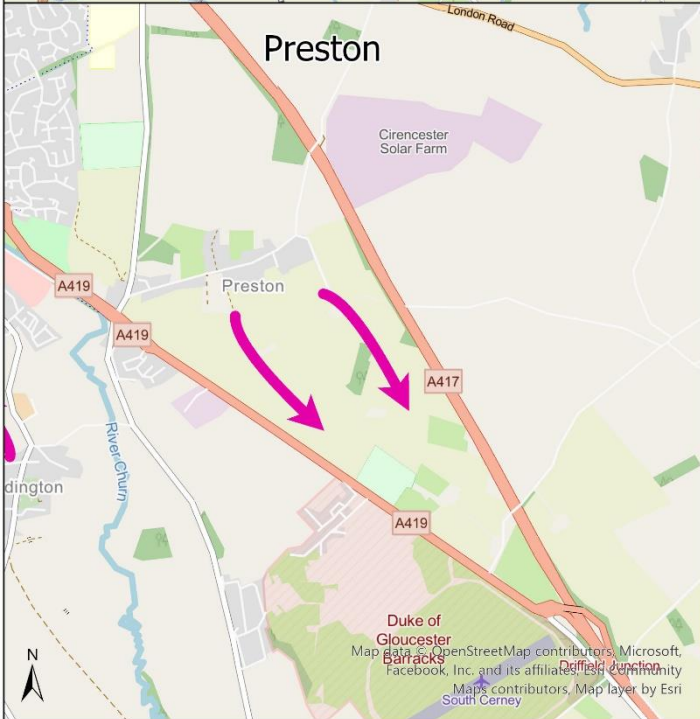
Kemble



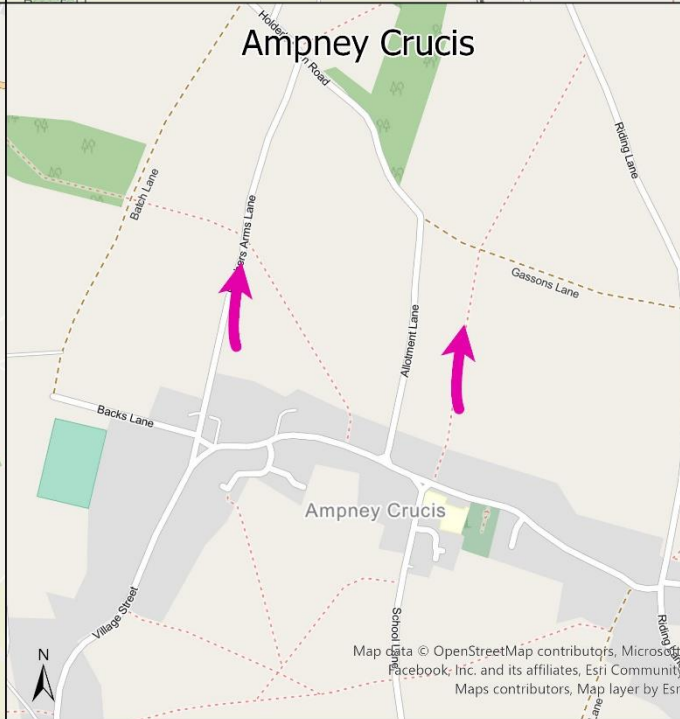
Cirencester and Siddington



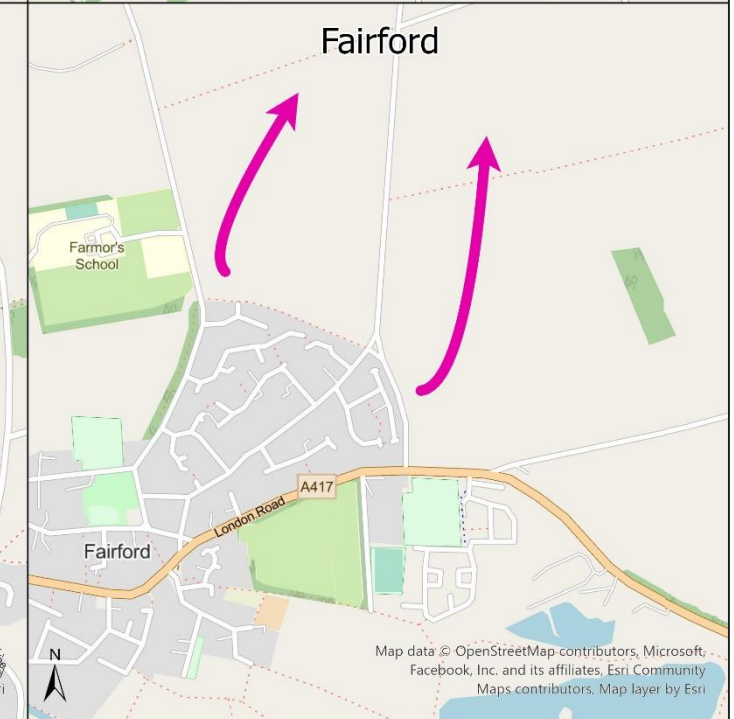
Preston



Ampney Crucis



Fairford



4. Beyond Conventional Housing

- 4.1 The government has put housing development at the forefront as shown by the introduction of the new, mandatory 'standard methodology' for calculating the number of homes needed in each local planning authority area. Accordingly, there is a focus on delivering on this target in this consultation. However, the updated development strategy will also look at the needs/requirements and land supply for other types of housing and development such as employment needs. Moreover, the Council also needs to take into account infrastructure needs and requirements that arise from development in the updated Local Plan. Evidence in regard to employment and infrastructure needs and sites has been commissioned and will form part of the next consultation on the Regulation 19 draft Local Plan.
- 4.2 The updated Local Plan itself will also be more than an update to the development strategy. It also aims to be 'Green to the Core' and protect the historic and natural environment, etc. These items have already been covered by the previous Regulation 18 consultation in February 2024 and comments received during that consultation remain valid. The updated version of these policies will be consulted on during the Regulation 19 consultation in 2026.

Employment and commercial development needs

- 4.3 Cotswold District Council is currently participating with all other local planning authorities in Gloucestershire in a county-wide Housing and Employment Needs Assessment. This study, which will be undertaken by an external consultant, will set out the employment needs as well as the type of housing required in the district and will inform policies accordingly. The study is expected to be completed by the end of 2025 and the results will feed into the policies which will be consulted upon in 2026.
- 4.4 The Council is also procuring a Town Centres Study which will identify retail and other commercial development needs for the main town centres.
- 4.5 Despite the results of the Housing and Employment Needs Assessment and Town Centres Study not being available until later this year, the Council still welcomes any comments regarding employment and commercial development needs in the district, especially in relation to the areas with potential for strategic development as set out in Chapter 3.

Gypsy and Traveller Needs

- 4.6 The Council is also participating with all other local planning authorities in Gloucestershire in a county-wide Gypsy and Traveller Accommodation Assessment. This study, which will be undertaken by an external specialist consultant, will set out the needs for different types of gypsy and traveller accommodation over the Local Plan period. The study is expected to be completed by this end of 2025 and the results will feed into the policies which will be consulted upon in 2026.
- 4.7 Despite the results of the Gypsy and Traveller Accommodation Assessment not being available until later this year, the Council still welcomes any comments regarding gypsy and traveller needs in the district and how these can be delivered if there is a shortfall in the supply of sites.

Infrastructure needs

- 4.8 New housing needs to be accompanied by the necessary infrastructure. Cotswold District Council has instructed an external specialist consultant to undertake an update to its Infrastructure Delivery Plan which will set out infrastructure needs and requirements of all development proposed in the Local Plan update.
- 4.9 The Infrastructure Delivery Plan will look at a large range of infrastructure items and will determine the infrastructure requirements and needs for each allocation in the updated Local Plan:
- Community and culture
 - Education
 - Healthcare
 - Transport (Highways)
 - Public Transport
 - Walking and Cycling
 - Open Space
 - Sport and Recreation
 - Flood Management
 - Water Supply and Waste Water (sewage)
 - Emergency Services
 - Utilities
 - Digital Infrastructure (telecoms)
 - Renewable Energy

4.10 The infrastructure requirements/needs are dependent on the recommended site allocations, which have not yet been determined at the time of this consultation. The Infrastructure Delivery Plan is therefore still in its early stages. Although the Call for Sites might result in new potential development sites being identified, the Council still welcomes comments on infrastructure needs and requirements either in general or for any of the high level locations identified in the previous chapter.

Question

Are there any other matters beyond conventional housing that have not been listed here that you think should be considered in the Development Strategy for the updated Local Plan?

5. Revised Vision and Objectives

- 5.1 The Cotswold District Council Local Plan 2011 to 2031 includes a vision statement setting out the aspirations of the plan for the future. This is supported by a set of objectives. These vision and objectives are being revised in the updated Local Plan to reflect the Council's Corporate Priorities as well as any changes in national legislation. The draft revised Vision and Objectives are as follows:

5.2 Vision

By 2043, Cotswold District will be a resilient, inclusive, and forward-looking rural district that has successfully responded to the climate crisis, conserved and enhanced the Cotswold National Landscape, delivered sustainable communities, and supported a vibrant, low-carbon economy. Development will have been guided by a spatial strategy that prioritises environmental stewardship, social equity, and economic vitality, while respecting the district's unique landscape, heritage, and character.

The district will have delivered a diverse range of housing, including a significant increase in socially rented and affordable homes, enabling residents of all ages and backgrounds to live securely and sustainably. New settlements and strategic sites will have matured into thriving communities, offering high-quality homes, employment opportunities, and essential services, all supported by integrated infrastructure and sustainable transport networks. Existing Principal and Non-Principal settlements will have grown proportionately, enhancing their role as local service centres while maintaining their distinct identities.

The district will have transitioned to zero-carbon development, with new buildings and infrastructure designed to minimise energy use and maximise renewable energy generation. Biodiversity Net Gain will be embedded across all development, contributing to a richer natural environment and improved ecological resilience.

Transport emissions will have been significantly reduced through investment in active travel infrastructure, public transport, and strategic growth focused around transport nodes. Communities will be healthier, more connected, and better supported by local services, green spaces, and digital infrastructure.

Cotswold District will continue to be "Green to the Core," with planning decisions consistently reflecting the long-term interests of people, place, and planet.

5.3 Objectives

A. Respond to the Climate Crisis through Adaptation and Mitigation

- Require all new development to be zero-carbon and climate-resilient.
- Support the provision of renewable energy schemes and promoting community owned renewables initiatives.
- Locate development away from flood-prone areas and promote water and energy efficiency.

B. Conserve and Enhance the Natural, Built, and Historic Environment

- Preserve the high quality, local distinctiveness, and diversity of the natural and historic environment.
- Support the sympathetic retrofit of historic buildings.
- Conserve and enhance the distinct character of the Cotswold National Landscape and open countryside.
- Promote high-quality, sustainable design and green infrastructure that supports health and wellbeing.

C. Deliver Inclusive, Healthy, and Affordable Housing

- Provide a diverse mix of housing types and tenures, with a focus on socially rented homes.
- Ensure development supports positive health outcomes and embeds local health and wellbeing strategies.

D. Enable a Vibrant, Low-Carbon Local Economy

- Support the transition to a low-carbon economy and promote local employment.
- Encourage the vitality and viability of town and village centres as places that support a range of activities and uses such as shopping, leisure, cultural and community activities; as well as providing access to affordable homes.
- Promote sustainable tourism.
- Maintain Cirencester's role as a key employment and service centre.

E. Promote Sustainable Transport and Connectivity

- Reduce transport emissions by encouraging walking, cycling, and public transport.
- Focus development in accessible locations with strong transport links.

- Create active transport hubs to aid health outcomes and reduce emissions and pollution

F. Ensure Infrastructure and Services Support Sustainable Communities

- Deliver infrastructure, services, and facilities that meet the needs of residents and businesses.
- Ensure the required infrastructure, as set out in the Infrastructure Delivery Plan, is delivered in a timely manner.

Question

Do you agree with the vision and objectives? Or is there anything else that should be covered in the vision and objectives? Please explain.

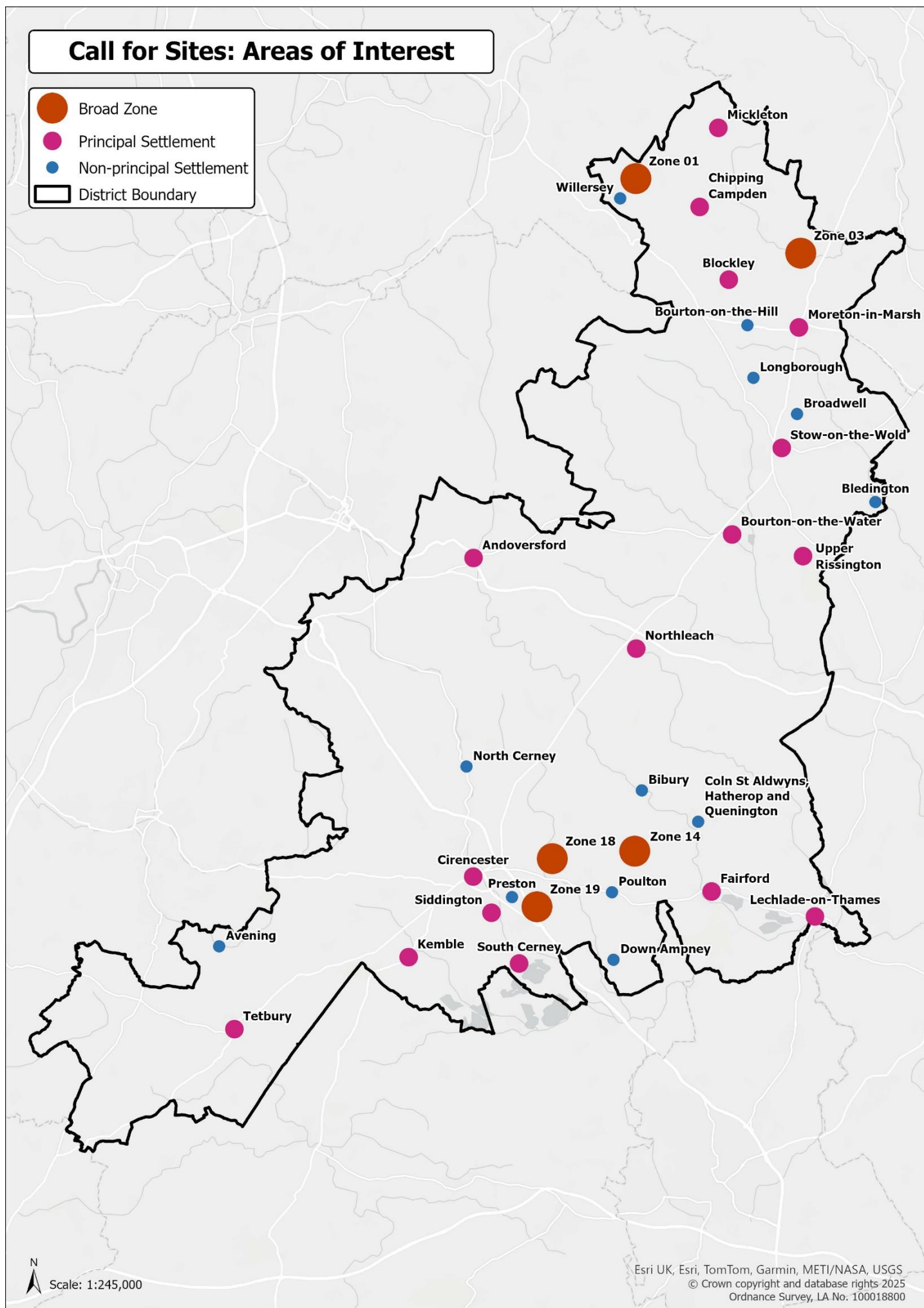
6. Call for Sites

- 6.1 As part of the preparation of the Local Plan, the Council is inviting submissions of potential development sites for consideration. This is an opportunity for landowners, developers, agents, and other interested parties to suggest sites that may be suitable for future development.
- 6.2 We are calling for sites for all types of development needs identified in the Local Plan, including:
- market and Affordable Housing;
 - employment / commercial development;
 - gypsy and traveller pitches;
 - renewable energy;
 - new country park(s); and
 - other types of development that may be needed.
- 6.3 Submissions should include:
1. A completed New Site Submission Form
 2. A clear site location plan
 3. Supporting information that demonstrates the site's suitability for development and the delivery timescales of the proposed development
- 6.4 The Assessment of Broad Strategic Development Locations [LINK](#) has narrowed down the potential locations for strategic development. These have been marked as 'Broad Zones' on the map below. Although the Council is keen to confirm all land that is available for development, the Council is especially interested to any available land for strategic growth in these Broad Zones. For more detailed information, please see the maps in the Assessment of Broad Strategic Development Locations [LINK](#). Similarly, we are particularly keen to hear about potential sites within and surrounding the Principal and Non-Principal Settlements identified in the Preferred Development Strategy.
- 6.5 In addition, the Council would find it helpful if landowners and agents who have previously submitted sites could:
- Reconfirm the availability of their sites
 - Provide any further relevant updates regarding the delivery or progress of those sites

- 6.6 Site submissions can be made on any land that is available for development. At this stage, the Council is seeking sites that can deliver five or more dwellings or economic development on sites of 0.25 hectares or more (or 500 square metres or more of floor space). The Council is unlikely to allocate land in areas with high flood risk (i.e. Flood Zones 3 identified on the [Flood Risk Map](#)), although such land may be suitable for green or blue infrastructure associated with the development.
- 6.7 To submit a new site, please complete a New Site Form. [LINK](#)
- 6.8 Please ensure that all submissions and updates are made by **Thursday 18th December 2025**. Late submissions may not be considered.

Call for Sites: Areas of Interest

- Broad Zone
- Principal Settlement
- Non-principal Settlement
- District Boundary



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Local Development Scheme October 2025



COTSWOLD
District Council

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1. Introduction

- 1.1 This is the Cotswold District Council Local Development Scheme. It explains what planning policy documents will be prepared during the three-year period October 2025 – September 2028. It also provides the timetable for producing these documents.
- 1.2 Cotswold District Council is producing a:
 - A Local Plan Review (2025-2043); and
 - A Community Charging Levy.

2. Cotswold District Local Plan (2011-2031) & Local Plan Review (2025-2043)

- 2.1 The Cotswold District Local Plan (2011-31) was adopted on 3 August 2018. The plan is the starting point in the determination of planning applications, providing an overall framework for growth in the period up to 2031.
- 2.2 Cotswold District Council began updating its Local Plan in June 2020. Initial work was primarily to make the adopted Local Plan 'Green to the Core' in response to the Council's climate change and ecological emergency declarations. In January 2024, the Council also began making preparations to deliver development requirements beyond 2031 (the end of the adopted Local Plan period). The intention was to combine the two Local Plan projects into a single comprehensive Full Local Plan Update further down the line if it was possible to do so, allowing the Council to keep its options open.
- 2.3 However, in December 2024 the Government introduced a new standard method for calculating housing need resulting in a doubling of the housing target for Cotswold District Council now needing to provide 1,036 homes a year. In response, in July 2025, Council resolved to combine the two local plan projects into one full Local Plan review and to update the Council's Community Infrastructure Levy in parallel.
- 2.4 Through the Local Plan review, the Council will seek to ensure the district has a five-year housing land supply¹ and passes the annual Housing Delivery Test² in future years. This includes a new Local Plan period that looks beyond 2031; new requirements for different types of development and supporting infrastructure; and a new strategy for how and where development will be located, including new development site allocations.

3. Community Infrastructure Levy (CIL)

- 3.1 The Community Infrastructure Levy (CIL) is a charge that can be applied to new developments to help pay for supporting infrastructure. Most new development which

¹ As required by National Planning Policy Framework (December 2024) paragraph 72

² As required by National Planning Policy Framework (December 2024) paragraph 79

creates net additional floor space of 100 square metres or more, or creates a new dwelling, is currently potentially liable for the levy.

- 3.2 The levy only applies in areas where a local authority has consulted on, and approved, a charging schedule which sets out its levy rates and has published the schedule on its website.
- 3.3 The Council adopted its CIL charging schedule in June 2019.
- 3.4 The Community Infrastructure Levy will be updated alongside the Local Plan review. This will also require the Council to update its existing CIL charging schedule because of new and or updated policies and viability evidence.
- 3.5 The government's national planning practice policy guidance sets out how a charging schedule should be prepared. It explains a charging schedule is prepared and adopted as follows:
 - a) the charging authority prepares its evidence base in order to prepare its draft levy rates, and collaborates with neighbouring / overlapping authorities (and other stakeholders);
 - b) the charging authority prepares and publishes a draft charging schedule for consultation;
 - c) representations are sought on the published draft;
 - d) the charging authority must take into account any representations made to it before submitting a draft charging schedule for examination;
 - e) an independent person (the "examiner") examines the charging schedule in public;
 - f) the examiner's recommendations are published;
 - g) the charging authority has regard to the examiner's recommendations and reasons for them; then
 - h) the charging authority approves the charging schedule.
- 3.6 The 2019 Regulations removed the requirement to consult on a preliminary draft charging schedule. However, charging authorities can consult more than once where they consider it to be appropriate.

4. Statement of Community Involvement

- 4.1 A Statement of Community Involvement explains how local communities and other stakeholders will be engaged in the preparation of the Local Plan and other related documents. It also provides information about how local communities and other stakeholders will be engaged in relation to the determination of planning applications.
- 4.2 Local planning authorities are required to review their Statements of Community Involvement every five years. The Council's current Statement of Community

Involvement was refreshed in December 2023 and will therefore not need to be updated prior to the adoption of the Local Plan review.

5. Local Plan Monitoring Reports

- 5.1 In accordance with national planning regulations the Council is required to produce a monitoring report addressing various matters including plan progress and implementation, neighbourhood planning, CIL (where applicable) and the duty to co-operate.
- 5.2 The Council prepares various monitoring reports, these include:
- a) Authority Monitoring Report;
 - b) Housing Land Supply Report (this calculates the Council's 5 year housing land supply);
 - c) Residential Land Monitoring Statistics;
 - d) Economic Land Monitoring Statistics;
 - e) Brownfield Land Register; and
 - f) Infrastructure Funding Statement.
- 5.3 Where possible, the Council updates and publishes the above reports annually. All documents are saved on the Council's Local Plan evidence webpage³ apart from the Infrastructure Funding Statement which can be found on the Council's CIL webpage⁴.

6. Risk Assessment

- 6.1 There are several risks that could affect the timetables set out in Appendix 1 of this Local Development Scheme. These are indicated in the table below, along with contingencies where possible.

Potential Risk	Impact / Contingency
Staff resources	A growth bid has been approved to provide additional resource and resilience to the Planning Policy and Infrastructure team, and it is envisaged that the staffing requirements for the preparation of the Local Plan will be met primarily from the Planning Policy and Infrastructure team. Input will be required as and when from other teams within the Council. Subject to availability, Development Management staff, Ecology, Heritage and Landscape staff, and the Climate Action Manager will be required to assist with updating specific policies in the

³ <https://www.cotswold.gov.uk/planning-and-building/planning-policy/evidence-base-and-monitoring/>

⁴ <https://www.cotswold.gov.uk/planning-and-building/community-infrastructure-levy/>

Potential Risk	Impact / Contingency
	<p>extant Local Plan.</p> <p>Short-term contracts and overtime will be considered where appropriate. Every effort will be made to rationalise workloads wherever possible and to make use of staff in other sections where their skills are appropriate to the task, notably Development Management and Housing Strategy. Specific studies will be undertaken by external specialist consultants where necessary.</p>
Availability of PINS for Examination	<p>The timetable for the preparation and adoption of Local Plans depends on the capacity of the Planning Inspectorate to undertake Examinations at the appropriate time. There will be lots of councils wanting to submit their local plans by December 2026. This could create a bottle neck in the system and may affect the timetable for adopting the Local Plan, which may require the council to switch to a New Style Plan. Officers will keep the Planning Inspectorate informed of the council's plan-making timetable. Every effort will be made to seek early confirmation that the proposed timings are acceptable.</p>
Changing national policy, guidance and evidence	<p>Changes to national planning policy and guidance and updated evidence can generate new issues or produce additional, unforeseen requirements. These can impact on deadlines or even affect the premise of the entire project. The Council will keep abreast of latest national guidance and best practice; revise the Local Plan timetable if necessary; and ensure adequate budgetary provision for consultancy support if required.</p>
Devolution White Paper	<p>Government intends to reform local government, creating more unitary authorities. This has potential to impact the Local Plan timetables (e.g. availability of funding). The Council will keep abreast of any changes; revise the Local Plan timetable if necessary; and ensure adequate budgetary provision for consultancy support if required.</p>
Failure of the Local Plan to meet tests of soundness and legal compliance	<p>Officers will attend relevant training or seminars on best practice and maintain a dialogue with the Planning Inspectorate and neighbouring authorities. Consultants appointed to undertake specific studies will be required to ensure their work meets the tests of soundness. All evidence will be robust and officers will make use of the</p>

Potential Risk	Impact / Contingency
	soundness and legal self-assessment toolkit. The Local Plan process will follow the regulations and outlined procedures. The Council has also sought advice from the Planning Inspectorate, the Planning Advisory Service and Counsel on key issues and will continue to do so.
Funding for evidence	Inadequate funding to support evidence gathering could significantly delay the delivery of the Local Plan update. The risk has been mitigated by the establishment of the Oversight and Programme Board and reporting structures to ensure requirements are identified early and worked into the budget plan. The Council has also bid for various government grants to accelerate the delivery of the Local Plan.
Cooperation of other external bodies	The new planning system involves complex arrangements for cooperation, consultation, engagement and evidence gathering. Failure on the part of the other bodies to respond in time or to provide adequate responses which require subsequent clarification could cause significant delay to work programmes. Officers will maintain an ongoing dialogue with partners to ensure the duty to cooperate is met. Any particular delays will be reviewed in the timetable. For joint working on evidence, clear working arrangements with other bodies will be required with strong programme management.
New data becoming available	Evidence will need to be as up to date as reasonably as possible. This could impact progress if the timing of data is delayed. Evidence will need to be amended accordingly, taking a proportionate approach. Only major shifts in official government projections should justify changes to the strategy, though some tweaks to policy direction may be necessary.
Large numbers of representations received	Representations that are not submitted through the online system (e.g. by email or letter) have to be manually entered, which is a time consuming task. It may be necessary to bring in other staff, or temporary assistance. This will require sufficient workstations with internet access to facilitate the exercise. The Council has sought to mitigate this risk by investing in a new digital engagement platform, which incorporates artificial intelligence auto

Potential Risk	Impact / Contingency
	summarisation technology.
Neighbourhood Plans and other corporate projects	<p>The Council has a legal duty to support the delivery of Neighbourhood Plans and this will continue to have an impact on resourcing. Early and continued engagement with town and parish councils will be vital, especially when establishing anticipated project timetables. The Council has also prepared a guide to confirm the level of support town and parish councils can expect from the Council.</p> <p>It may be necessary to bring in other staff, or temporary assistance, at certain times and the Council has engaged a contractor to deal with this work for the time being.</p>

Appendix 1 – Document Profiles

Cotswold District Local Plan 2025 – 2043	
Status	Development Plan Document (DPD)
Overview	The Local Plan sets out the overall framework for future development growth in Cotswold District to 2043. The plan takes account of the Council's corporate plan, emergency declarations and other material considerations (for example the National Planning Policy Framework).
Geographical coverage	District-wide
Timetable	<p>Consultation: Preferred Options (Reg. 18) – (autumn) 2025 Consultation Technical documents (Regulation 18) winter/spring 2026</p> <p>Consultation: Publication of pre-submission draft Local Plan (Reg. 19) – (summer) 2026</p> <p>Submission of pre-submission draft Local Plan (Reg. 22) – Q4 (winter) 2026</p> <p>Examination – (spring) 2027</p> <p>Adoption – (winter) 2027</p>
Conformity	Prepared in conformity with the National Planning Policy Framework and the National Planning Practice Guidance.
Management arrangements	Document production to be led by the Council's Planning Policy and Infrastructure team under the direction of the Head of Planning Policy and Infrastructure.
Resource requirements	Internal resources comprise the Council's Planning Policy and Infrastructure team with input from other teams and services as appropriate. External resources will be drawn upon to produce some supporting technical evidence.
Community engagement	Engagement to be carried out in accordance with the requirements of the adopted Statement of Community Involvement (SCI).

Cotswold District Community Infrastructure Levy	
Status	Community Infrastructure Levy
Overview	The Community Infrastructure Levy (CIL) is a charge that can be applied to new developments to help pay for supporting infrastructure. Most new development which creates net additional floor space of 100 square metres or more, or creates a new dwelling, is currently potentially liable for the levy. The levy only applies in areas where a local authority has consulted on, and approved, a charging schedule which sets out its levy rates and has published the schedule on its website.
Geographical coverage	District-wide
Timetable	<p>Consultation: Draft charging schedule – (summer) 2026</p> <p>Submission for Examination – (winter) 2026</p> <p>Examination – (summer) 2027</p> <p>Adoption – Q4 (winter) 2027</p>
Conformity	Prepared in conformity with the National Planning Policy Framework and the National Planning Practice Guidance.
Management arrangements	Document production to be led by the Council's Planning Policy and Infrastructure team under the direction of the Head of Planning Policy and Infrastructure and the Infrastructure Delivery Lead.
Resource requirements	Internal resources comprise the Council's Planning Policy and Infrastructure team with input from other teams and services as appropriate. External resources will be drawn upon to produce some supporting technical evidence.
Community engagement	Engagement to be carried out in accordance with the requirements of the adopted Statement of Community Involvement (SCI).

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COTSWOLD
District Council

Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET – 16 OCTOBER 2025
Subject	2026/27 BUDGET STRATEGY AND MEDIUM-TERM FINANCIAL STRATEGY (MTFS) UPDATE
Wards affected	All
Accountable member	Cllr Patrick Coleman, Cabinet Member for Finance Email: patrick.coleman@cotswold.gov.uk
Accountable officer	David Stanley, Deputy Chief Executive and Section 151 Officer Email: david.stanley@cotswold.gov.uk
Report author	David Stanley, Deputy Chief Executive and Section 151 Officer Email: david.stanley@cotswold.gov.uk
Summary/Purpose	This report sets out the Budget Strategy to support the preparation of the 2026/27 revenue and capital budgets and presents an updated Medium Term Financial Strategy forecast.
Annexes	Annex A – Fair Funding 2.0 summary Annex B – Exceptional Financial Support provided to Local Authorities 2025/26 Annex C – Illustrative impact of Fair Funding 2.0 Annex D – Draft (Updated) Medium Term Financial Strategy (MTFS) 2026/27 to 2029/30 Annex E – Draft (Updated) Capital Programme and Capital Financing Statement 2026/27 to 2029/30
Recommendation(s)	That Cabinet resolves to: 1. Approve the 2026/27 Budget Strategy as outlined in the report.
Corporate priorities	<ul style="list-style-type: none"> Delivering good services
Key Decision	NO
Exempt	NO
Consultees/ Consultation	N/A

1. EXECUTIVE SUMMARY

- 1.1** The Council approved its Medium-Term Financial Strategy (MTFS) and set the budget for the 2025/26 financial year on 24 February 2025. This Report sets out the Council's Budget Strategy for 2026/27 and provides an update to the MTFS forecast position.
- 1.2 A significant budget gap has been identified in the MTFS forecasts considered by Council since February 2023.** The indicative position outlined for 2025/26 through to 2028/29 was an unfunded budget gap of £12.112m. The Government has consulted on significant changes to the way each Council is funded through the Local Government Finance Settlement ("LGFS"), subject to the detailed LGFS, changes proposed in the consultation will take effect from April 2026.
- 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. Inflation, as measured by the Consumer Prices Index ("CPI") is above the Bank of England's target of 2.00% (and above target since July 2024). As a result, there remains uncertainty around the pace of interest rate reduction in the current financial year which have an influence over the Council's budget for 2026/27 and the MTFS period both directly and indirectly.
- 1.4** The Government published a white paper on Local Government in December 2024 ["English Devolution White Paper – Power and Partnership: Foundations for Growth"](#). Local government reorganisation for two-tier areas (through the creation of Unitary Councils) forms a significant part of the Government's plans.
- 1.5** Whilst it is outside of the scope of this report, Local Government Reorganisation ("LGR") proposals will have an impact on the council's Medium-Term Financial Strategy. The timeline for reorganisation in Gloucestershire is for the new unitary council(s) to be established on 01 April 2028. This means that Cotswold District Council would cease on 31 March 2028 with 2027/28 being the final financial year.
- 1.6** However, the MTFS is prepared on a "going concern" basis - that the council will continue to operate and meet its financial obligations for the foreseeable future regardless of LGR.

- 1.7** The inflation rate has increased since the February 2025 MTFS (CPI currently 3.8%). Interest rates have reduced to 4.0% with the expectation of one further interest rate reductions in 2025 (taking the base rate to 3.75%).
- 1.8** The Government published 2 consultations in June 2025 that frame the wider reforms to Local Government Finance. The Fair Funding 2.0 consultation set out a number of changes to the way in which funding will be allocated to local authorities. The bullet points below provide a summary of the key issues with further detail in Annex B.

Key Objectives

- Modernise funding formulas to better reflect local needs and resources.
- Simplify grant allocations and reduce reliance on competitive bidding.
- Introduce multi-year settlements to improve financial planning.
- Empower councils through greater flexibility over sales, fees, and charges.

Core Components

- Relative Needs Formula (RNF): Assesses demand for services across areas.
- Area Cost Adjustment (ACA): Accounts for regional cost differences in service delivery.
- Resource Adjustment: Reflects the council tax revenue potential of each authority.

Transitional Arrangements

- Funding changes will be phased in over three years (2026–2029).
- A proposed “cash flat floor” aims to protect councils from sharp funding reductions.
- Cotswold District Council is one of around 40 local authorities (largely Shire Districts and Inner London Boroughs) that may need to manage larger losses. MHCLG have indicated that the funding floor may not be set at the flat cash level, and a floor of -5% to -7% of Core Spending Power (“CSP”) has been proposed. Illustrative charts shown in Annex C.

Other Proposals

- Reform of the New Homes Bonus.
- Long-term changes to the Business Rates Retention System.

- Integration of Strategic Authorities into the Local Government Finance Settlement.
- Consideration of equalities impacts and devolution opportunities.

1.9 The reforms will have a significant impact on the level of funding the Council receives from the Government. The Fair Funding Review 2.0 proposes a major overhaul of local government finance, aiming for fairness and transparency. While it promises simplification and better alignment with local needs, it also poses risks of funding reductions for some councils. Members should be aware of the potential implications for service delivery, financial planning, and the need to engage with transitional support mechanisms. Based on the consultation (which closed on 15 August 2025) resources (funding) are likely to be directed towards high-need/low taxbase authorities from low-need/high taxbase authorities

1.10 The Government will provide their response to consultation responses in late September/early October and will be followed by the publication of the Local Government Finance Policy Statement later in October ahead of the budget in November. The Government have indicated that statement will provide local authorities with more clarity on likely funding allocations ahead of the settlement announcement expected mid to late December.

1.11 The resetting of the Business Rates Retention System, cessation of New Homes Bonus, and the interaction with the LGR would suggest that Shire District Councils such as Cotswold are likely to see significant reductions in their funding and has formed the basis of funding assumptions in the MTFS for several years.

1.12 Alongside the Fair Funding 2.0 consultation, the Government sought views on modernising and improving the administration of council tax. This consultation set out the government's proposed approach to the way Council Tax is administered by local authorities with the broad premise of delivering a fairer and more efficient system for taxpayers and local government.

- Changing council tax billing from 10-months to 12-months by default
- Sought views on how the transparency of council tax information could be improved with the intention to help taxpayers understand what their council tax is spent on.

- Sought views on how to modernise council tax disregards to ensure they continue to support those they were intended to support.
- Improvements in the efficiency of council tax billing and communication
- Understanding whether the government could remove barriers that may exist around challenging council tax banding.
- Changes to the process for collecting and enforcing council tax charges. Specifically, the government believes households should be free from concerns of disproportionate enforcement action.

1.13 Therefore, it should be noted the updated MTFS position set out in this report is subject to uncertainty and a degree of estimation of costs and income. As with all estimates and assumptions, there is an inherent risk that they may not be accurate. The financial position will continue to be monitored with the estimates and assumptions reviewed and updated throughout the budget setting process. These will be finalised once the provisional Local Government Settlement is announced which is expected in December following the Budget on 26 November 2025.

1.14 Having a clear set of budget principles for the Council to accept and work toward helps a clear framework on the journey to setting a balanced budget for the forthcoming year. These are set out in sections 4 and 5 of the report and cover the Council's Best Value Duty, approach to reserves, full cost recovery through fees and charges, and capital investment priorities.

1.15 The 2026/27 estimate for Council Tax maintains the assumption of an increase in the number of dwellings liable for Council Tax (i.e., a 1% increase in the Taxbase) and a £5 increase in a Band D charge for Council Tax. This falls within the permissible level of increase before triggering a local referendum and equates to an increase less than 10 pence per week for a Band D property.

1.16 As outlined, the Fair Funding 2.0 proposals are dependent upon a full rest of the Retained Business Rates System from 2026/27.

1.17 Alongside the reset, a new valuation period will commence from April 2026 and will introduce new valuations for every business with the addition of further business rates multipliers, as set out in the extract below:

Multiplier structure from 2026-27

Current system (2025-26)	New system (2026-27 onward)	
Small business multiplier, all properties, RV below £51,000	Small business RHL multiplier, RHL properties only, RV below £51,000	Small business multiplier, non-RHL properties, RV below £51,000
Standard multiplier, all properties, RV £51,000 and above	Standard RHL multiplier, RHL properties only, RV £51,000 - £499,999	Standard multiplier, non-RHL properties, RV £51,000 - £499,999
	High-value multiplier, all properties, RV £500,000 and above	

The rates for the new multipliers will be announced at Budget 2025, taking account of the revaluation due in 2026, as well as the economic and fiscal context.

1.18 Therefore, forecasting of business rates income will be more complex than in previous years with less certainty given the 2026 revaluation.

1.19 An initial estimate of £2.304m was included in the February 2025 MTFS. This has been estimated at £2.166m within the Pixel financial model but has not been adjusted within the MTFS.

1.20 The Council is required to finalise its Business Rates estimates for 2026/27 and its initial estimate of any surplus or deficit for 2025/26 by 31 January 2026 which will be included in the February 2026 MTFS.

1.21 The draft MTFS shown in Table ES1, and Annex D is based on the most credible assumptions and forecasts of income and expenditure over the next 4 years.

Table ES1 – Draft MTFS

	MTFS Period			
	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	2029/30 (£'000)
Medium Term Financial Strategy				
Opening Budget				
Service	17,359	17,359	17,359	17,359
Corporate	(1,717)	156	158	158
Net Revenue Budget	15,641	17,515	17,517	17,517
Budget Changes & Adjustments				
Provision for Inflation	629	1,268	1,903	2,557
Budget Pressures (Phase 2 FYE)	763	564	464	464
Other budget pressures	0	0	0	0
Savings	(2,097)	(2,275)	(2,436)	(2,651)
REVISED Net Revenue Budget	14,936	17,071	17,447	17,887
Funded by:				
Council Tax	(7,361)	(7,661)	(7,967)	(8,278)
Business Rates	(2,304)	(2,435)	(2,571)	(2,711)
FFR 2.0 Damping	(3,571)	(1,951)	(429)	955
EPR	(751)	(751)	(751)	(751)
Collection Fund	0	0	0	0
TOTAL Funding	(13,986)	(12,797)	(11,718)	(10,784)
Budget shortfall/(surplus)	950	4,274	5,729	7,103

1.22 The Financial Resilience reserve was relied upon during 2022/23 and 2023/24 to balance the budget (£2.103m) which was not sustainable. For 2024/25 and 2025/26 the budget and Medium-Term Financial Strategy were prepared on the basis that planned operating surpluses would be transferred to the Financial Resilience Reserve.

1.23 The level of savings included in the February 2025 MTFS, and the update set out in this report does mitigate the budget gap identified for 2026/27 but does not fully close the budget gap identified for 2027/28. The Financial Resilience reserve is being used to balance the budget in the short-term and will be depleted over the MTFS period leading to a potential deficit position by 2028/29 – the point at which services transfer to the new unitary. The Council will need to address the scale of the budget gap to ensure a balanced budget can be set for 2026/27 and beyond. The position set out in this report is by no means complete and the budget gap may change due to assumptions being updated.

1.24 The CIPFA Financial Management Code (FM Code) is designed to support good practice in financial management and to assist local authorities in demonstrating their financial sustainability. The FM Code is based on a series of principles supported by specific standards which are considered necessary to provide the strong foundation to

- financially manage the short, medium, and long-term finances of a local authority
- manage financial resilience to meet unforeseen demands on services.
- manage unexpected shocks in their financial circumstances.

1.25 A key element of demonstrating financial sustainability and compliance with the FM Code is for the Council to ensure suitable mechanisms are in place around savings so that they are identified, agreed, planned, implemented, and achieved. This will help to ensure the funding gap identified within the MTFS is addressed in a planned and managed way.

1.26 Given the scale of the financial challenge the Council is facing, the primary focus will be on Resident focused transformation and smarter internal working projects. This will help ensure adequate cost reductions are identified, scoped, and planned over the MTFS period. Savings and Transformation ideas are likely to be within the common themes already identified:

- Digitalisation - increased use of technology, using existing tech to maximum capacity, and use of AI for efficiencies.
- Resident self-service - via improved web offer, increased use of comms channels
- Workforce fit for the future – upskilling and restructuring.
- Improved systems and processes to remove waste and failure demand grouped by workstream and indicate outcomes expected in terms of financial and service benefits and set challenging but achievable action plans for delivery by agreed periods.

1.27 These will be brought forward over the coming months once an action plan for each major workstream has been developed. Project Management support and external support may be required on individual lines of enquiry to ensure options are fully appraised prior to inclusion in the programme.

- 1.28** This will require careful consideration of the resources required to support and deliver a more comprehensive medium-term programme where service delivery responsibility is evolving.
- 1.29** Subject to further due diligence, it is anticipated that a draft programme will be included in the February 2026 MTFS with a clear delivery plan for each year. However, the programme will need to be flexible and agile to meet the financial challenge and be capable of scaling up or down to meet any emerging requirement.
- 1.30** A review of the Reserves and Balances strategy will be undertaken to consider the adequacy of reserves considering the continued financial risks faced by the Council. The review will consider guidance published under CIPFA Bulletin 13: Local Authority Reserves and Balances (March 2023).
- 1.31** Total capital expenditure increases to £7.744m in 2026/27, decreases to £4.208m for 2027/28 and £2.130m in 2028/29 with an estimate of £2.743m in 2029/30.
- 1.32** The 2026/27 capital programme includes £5.171m provision for replacement of Waste and Recycling vehicles in line with the replacement programme. However, given the significant capital outlay and the potential impact from Local Government Reorganisation both the profile of this expenditure and method of financing is currently under review and will be included in the final budget proposals presented to the Cabinet and Council in February 2026.

Table ES2 – Capital Programme 2026/27 to 2029/30

Capital Programme	2026/27 Budget (£'000)	2027/28 Budget (£'000)	2028/29 Budget (£'000)	2029/30 Budget (£'000)	TOTAL Budget (£'000)
Leisure & Communities	500	0	0	550	1,050
Housing/Planning and Strategic Housing	1,839	2,231	1,775	1,819	7,664
Environment	5,255	1,826	205	224	7,510
ICT, Change and Customer Services	150	150	150	150	600
Shared Prosperity Fund Projects	0	0	0	0	0
Land Legal and Property	0	0	0	0	0
Transformation and Investment	0	0	0	0	0
	7,744	4,208	2,130	2,743	16,824

- 1.33** As set out in the *2025/26 Revenue Budget, Capital Programme and Medium-Term Financial Strategy* report, the Council's capital expenditure has up until the current financial year been predominantly financed from capital receipts. As these are forecast to deplete over the capital programme period the Council will need to undertake prudential borrowing to support future capital expenditure plans. Other sources of finance support the capital programme, either from external sources (government grants and other contributions) or the Council's own resources (revenue, reserves, and capital receipts).
- 1.34** The Capital Financing position will be reviewed by the s151 Officer during the year as expenditure forecasts are updated to ensure a balanced use of capital resources and mitigation of current and future interest rates.
- 1.35** The report sets out the Council's financial prospects for 2026/27. Final budget proposals, including the outcome from the Local Government Finance Settlement, will be presented to the Cabinet and debated at Council during February 2025.

2. BACKGROUND

- 2.1** The Council approved its Medium-Term Financial Strategy (MTFS) and set the budget for the 2025/26 financial year on 24 February 2025. This Report sets out the Council's Budget Strategy for 2026/27 and provides an update to the MTFS forecast position.
- 2.2 A significant budget gap has been identified in the MTFS forecasts considered by Council since February 2023.** The indicative position outlined for 2025/26 through to 2028/29 was an unfunded budget gap of £12.112m. The Government has consulted on significant changes to the way each Council is funded through the Local Government Finance Settlement ("LGFS"), subject to the detailed LGFS, changes proposed in the consultation will take effect from April 2026.

Table 1 – February 2025 Medium Term Financial Strategy position

MTFS Summary	2025/26 (£'000)	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)
Net Service Revenue Expenditure	17,241	17,241	17,241	17,241
Corporate Items/Non Service Income & Expenditure	(1,154)	(459)	169	121
Transfers to/(from) earmarked reserves	(620)	(1,259)	(13)	37
Provision for Inflation	0	629	1,268	1,903
Service + Corporate Items	15,467	16,152	18,664	19,302
Budget Pressures	597	763	564	464
Technical Adjustments	0	0	0	0
Risk Items	0	0	0	0
Savings and Transformation Plan items	(359)	(1,340)	(1,551)	(1,766)
Draft Net Revenue Budget	15,704	15,575	17,677	18,000
TOTAL Funding	(16,342)	(13,986)	(12,797)	(11,718)
Budget Gap / (Surplus)	(638)	1,589	4,879	6,282
				12,112

2.3 Under the Local Government Finance Act 1992 (as amended), the Council is legally required to set a balanced budget for the following financial year and remains in balance. Section 114 of the Local Government Finance Act 1998 requires the Section 151 Officer to report to all Members if there is likely to be unlawful expenditure or an unbalanced budget.

2.4 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. Inflation, as measured by the Consumer Prices Index ("CPI") is above the Bank of England's target of 2.00% (and above target since July 2024). As a result, there remains uncertainty around the pace of interest rate reduction in the current financial year which have an influence over the Council's budget for 2026/27 and the MTFS period both directly and indirectly.

2.5 The Government published a white paper on Local Government in December 2024 ["English Devolution White Paper – Power and Partnership: Foundations for Growth"](#). Local government reorganisation for two-tier areas (through the creation of Unitary Councils) forms a significant part of the Government's plans.

- 2.6** Whilst it is outside of the scope of this report, Local Government Reorganisation ("LGR") proposals will have an impact on the council's Medium-Term Financial Strategy. The timeline for reorganisation in Gloucestershire is for the new unitary council(s) to be established on 01 April 2028. This means that Cotswold District Council would cease on 31 March 2028 with 2027/28 being the final financial year.
- 2.7** However, the MTFS is prepared on a "going concern" basis - that the council will continue to operate and meet its financial obligations for the foreseeable future regardless of LGR.
- 2.8** The council will continue to provide services to residents up to 31 March 2028, support the LGR process including the transition of services to the new unitary council, and must be able to remain financially sustainable.
- 2.9** As set out in the Financial Performance – Q1 2025/26 report to Cabinet in September 2025, 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.
- 2.10** 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.
- 2.11** Members should consider some of the wider issues facing local government that will inform the 2026/27 revenue and capital budgets and the MTFS.
- 2.12** Several local authorities have issued section 114 notices since 2018 with Birmingham City Council Woking Borough Council, Slough Borough Council, and Thurrock Council. A section 114 notice indicates that the council's forecast income is insufficient to meet its forecast expenditure for the next year.

2.13 Whilst the number of authorities issuing section 114 notices is relatively low (8 out of 317 local authorities in England since 2018) it is unprecedented to have this many issued in a short space of time.

2.14 The Government, through LGFS, provided 30 councils with Exceptional Financial Support (“EFS”) for the 2025/26. For 8 councils this included agreement to support for prior years. Details of the EFS provided are set out in Annex A.

2.15 Whilst there is no immediate risk of Cotswold District Council having to apply for Exceptional Financial Support (EFS) or consider issuing a section 114 notice, members will note the budget gap forecast over the medium-term must be closed to maintain financial sustainability.

2.16 Should the budget gap not be closed sufficiently, EFS cannot be ruled out in future years.

2.17 The level of uncertainty across the sector makes it more difficult to plan for the medium-term. As outlined earlier in the report, Local Government Finance reforms will take effect from April 2026.

2.18 The Government published 2 consultations in June 2025 that frame the wider reforms to Local Government Finance. The Fair Funding 2.0 consultation set out a number of changes to the way in which funding will be allocated to local authorities. The bullet points below provide a summary of the key issues with further detail in Annex B.

Key Objectives

- Modernise funding formulas to better reflect local needs and resources.
- Simplify grant allocations and reduce reliance on competitive bidding.
- Introduce multi-year settlements to improve financial planning.
- Empower councils through greater flexibility over sales, fees, and charges.

Core Components

- Relative Needs Formula (RNF): Assesses demand for services across areas.
- Area Cost Adjustment (ACA): Accounts for regional cost differences in service delivery.

- Resource Adjustment: Reflects the council tax revenue potential of each authority.

Transitional Arrangements

- Funding changes will be phased in over three years (2026–2029).
- A proposed “cash flat floor” aims to protect councils from sharp funding reductions.
- Cotswold District Council is one of around 40 local authorities (largely Shore Districts and Inner London Boroughs) that may need to manage larger losses. MHCLG have indicated that the funding floor may not be set at the flat cash level, and a floor of -5% to -7% of Core Spending Power (“CSP”) has been proposed.

Other Proposals

- Reform of the New Homes Bonus.
- Long-term changes to the Business Rates Retention System.
- Integration of Strategic Authorities into the Local Government Finance Settlement.
- Consideration of equalities impacts and devolution opportunities.

2.19 The reforms will have a significant impact on the level of funding the Council receives from the Government. The Fair Funding Review 2.0 proposes a major overhaul of local government finance, aiming for fairness and transparency. While it promises simplification and better alignment with local needs, it also poses risks of funding reductions for some councils. Members should be aware of the potential implications for service delivery, financial planning, and the need to engage with transitional support mechanisms. Based on the consultation (which closed on 15 August 2025) resources (funding) are likely to be directed towards high-need/low taxbase authorities from low-need/high taxbase authorities

2.20 The Government will provide their response to consultation responses in late September/early October and will be followed by the publication of the Local Government Finance Policy Statement later in October ahead of the budget in November. The Government have indicated that statement will provide local authorities with more clarity on likely funding allocations ahead of the settlement announcement expected mid to late December.

2.21 The resetting of the Business Rates Retention System, cessation of New Homes Bonus, and the interaction with the LGR would suggest that Shire District Councils such as Cotswold are likely to see significant reductions in their funding and has formed the basis of funding assumptions in the MTFS for several years.

2.22 Alongside the Fair Funding 2.0 consultation, the Government sought views on modernising and improving the administration of council tax. This consultation set out the government's proposed approach to the way Council Tax is administered by local authorities with the broad premise of delivering a fairer and more efficient system for taxpayers and local government.

- Changing council tax billing from 10-months to 12-months by default
- Sought views on how the transparency of council tax information could be improved with the intention to help taxpayers understand what their council tax is spent on.
- Sought views on how to modernise council tax disregards to ensure they continue to support those they were intended to support.
- Improvements in the efficiency of council tax billing and communication
- Understanding whether the government could remove barriers that may exist around challenging council tax banding.
- Changes to the process for collecting and enforcing council tax charges. Specifically, the government believes households should be free from concerns of disproportionate enforcement action.

2.23 Whilst local government is supportive of some of the proposals set out above, there are concerns across the sector that some of the measures are unnecessary and could be counter-productive and lead to cashflow impacts on councils.

2.24 The proposals around billing for 12-months by default and those around enforcement were of particular concern.

- The option for 12 instalments is already readily available to Council Taxpayers; it closes down options to assist taxpayers who suffer financial shocks; it will have a negative impact on the council's cashflow and finances. The proposed move could have a significant disruptive impact - on those that budget on the basis

of 10 instalments (with February and March being 'free' months) and the proposal will have little or no impact on those already struggling to pay their bills over 12 months.

- Local government Council Tax collection powers are being compared to the powers of an FCA regulated debt collector. Council Tax is a compulsory tax, not a civil debt, and any questions relating to the proportionality of Council Tax enforcement must be compared to other taxes, such as those under the auspices of the HMRC.
- Each Billing Authority, as an independent statutory body, should be able to set its own policy in relation to the recovery of debts.

2.25 The consultation closed on 12 August 2025 with a response expected as part of the Local Government Finance Settlement in December.

2.26 The timetable for LGR in Gloucestershire is for the creation of a new unitary Council/new unitary Councils with effect from April 2028.

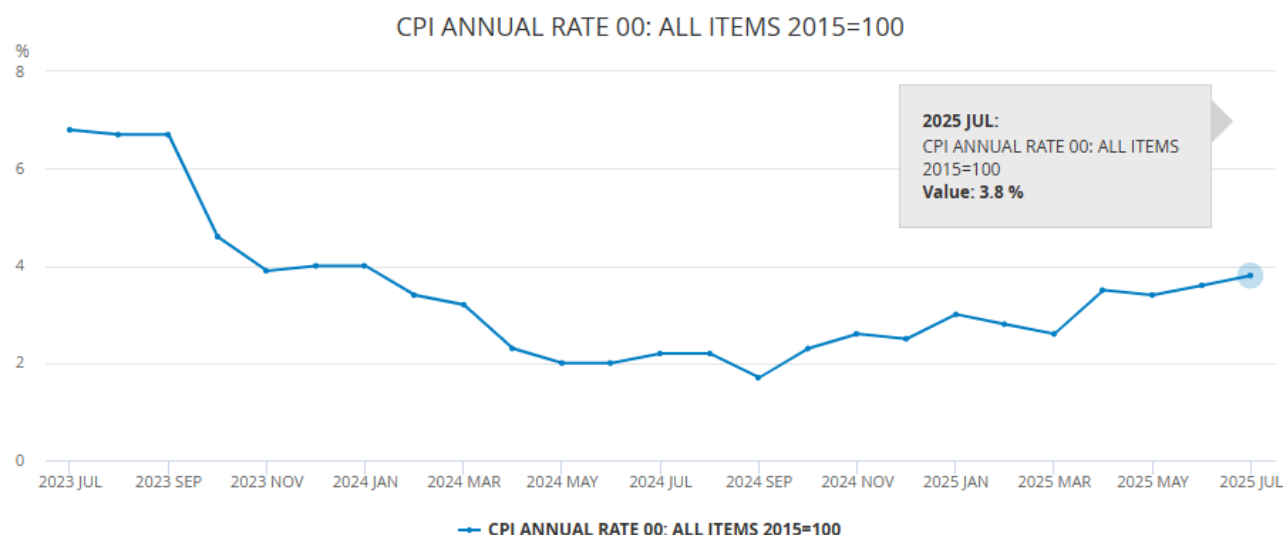
2.27 Therefore, it should be noted the updated MTFS position set out in this report is subject to uncertainty and a degree of estimation of costs and income. As with all estimates and assumptions, there is an inherent risk that they may not be accurate. The financial position will continue to be monitored with the estimates and assumptions reviewed and updated throughout the budget setting process. These will be finalised once the provisional Local Government Settlement is announced which is expected in December following the Budget on 26 November 2025.

3. EXTERNAL ECONOMIC ENVIRONMENT

Inflationary Pressures

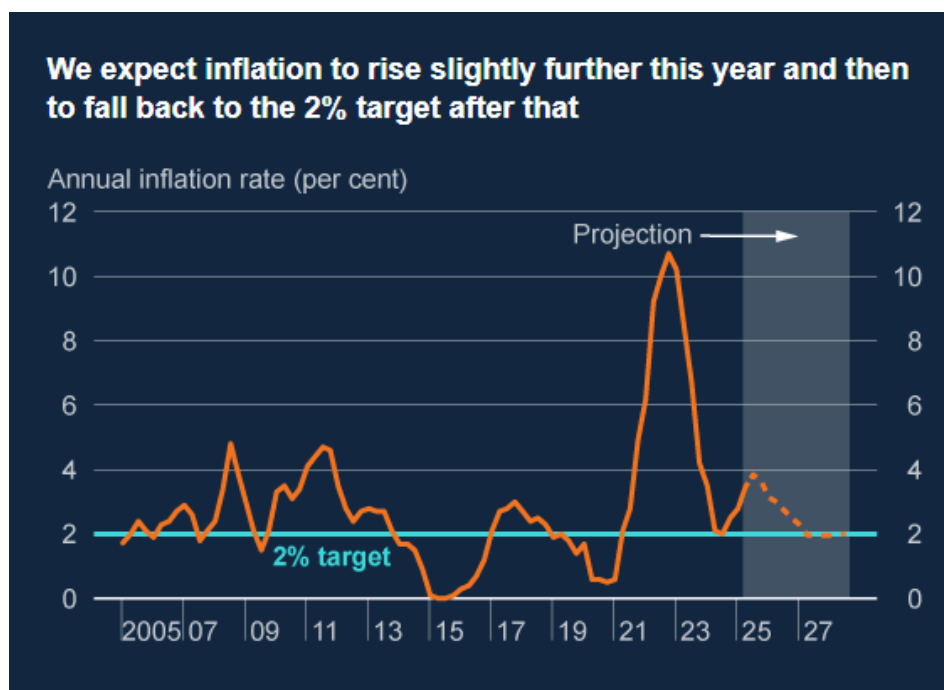
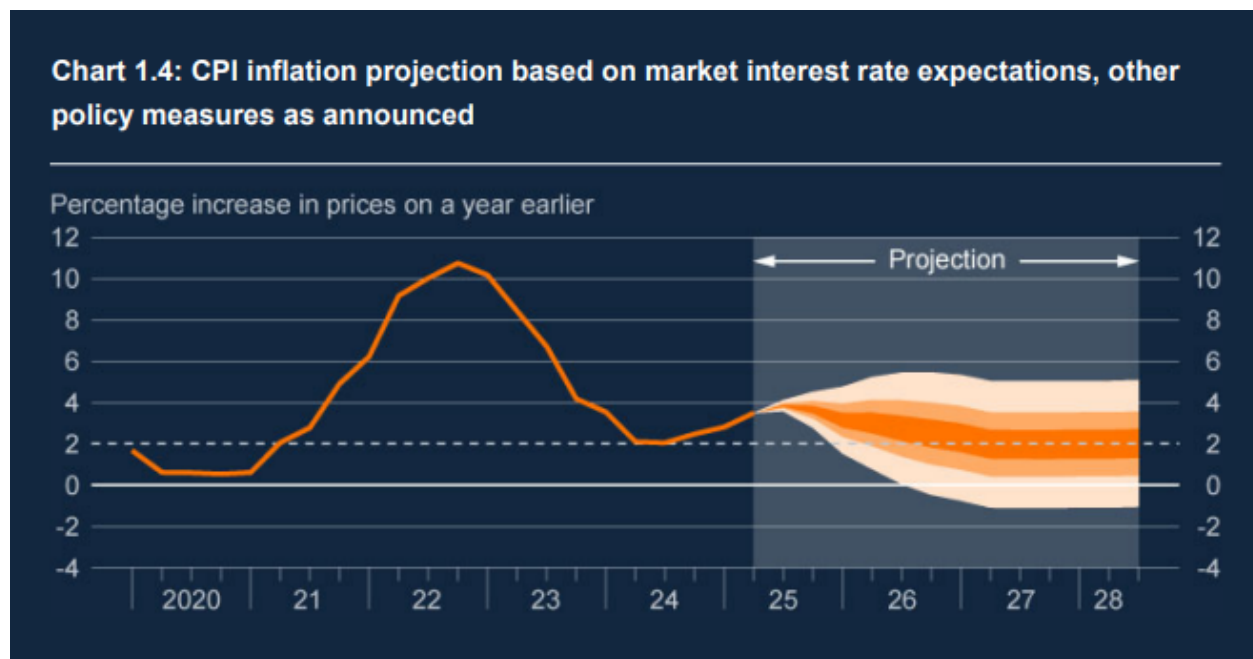
3.1 The level of inflation, as measured by the Consumer Prices Index, for July 2025 increased to 3.8% (from 3.6% in June 2025). Although it is not the Government's preferred measure of inflation, the Retail Prices Index is 4.8% (4.4% in June 2025). Core inflation (as defined by the Office for National 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).

Graphs B1/B2 – Bank of England CPI Inflation forecast



- 3.4** The current level of inflation and expectations for 2026/27 shown in the Bank of England's Fan Chart above will need to be taken into account when assessing the impact on 2026/27 revenue and capital budgets and over the MTFS-period.

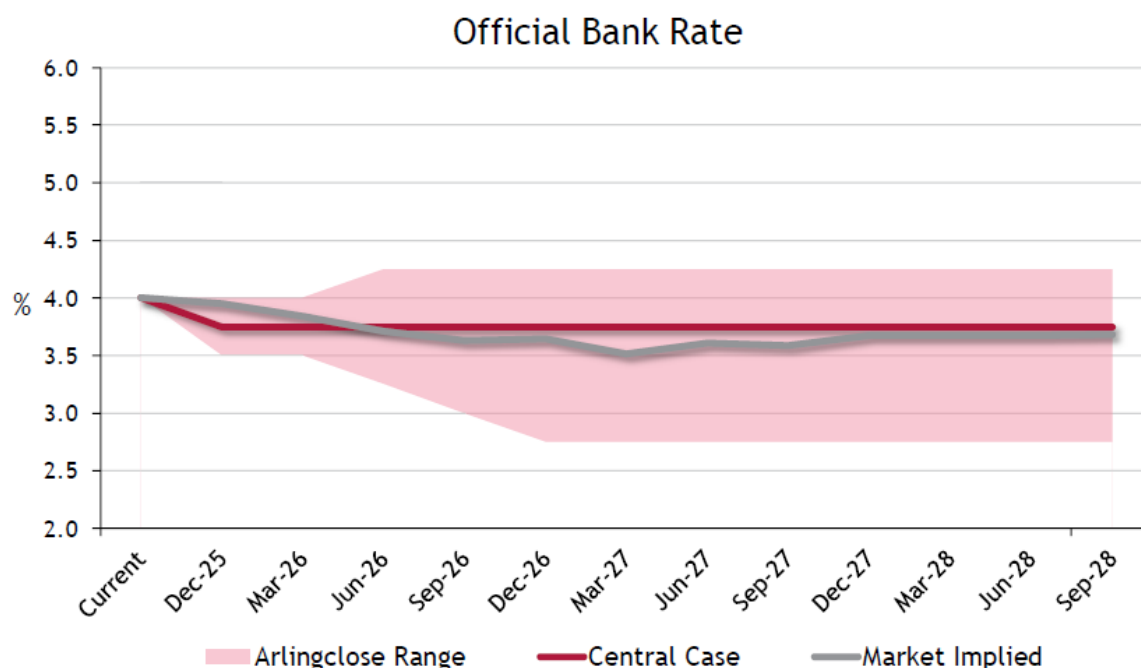
Inflationary Pressures – Pay Award

- 3.5** The assumption made for the 2025/26 budget was for an average Pay Award of 3% across Publica, Ubico and Council staff. Inflationary provision of £0.515m was included in the budget for the pay award.
- 3.6** The Local Government pay award was settled on 23 July 2025. Although the pay award for Chief Officers and Chief Executive was subject to separate negotiations, the award as set out below was agreed for all with effect from 01 April 2025:
- an increase of 3.2% on all NJC pay points and allowances.
- 3.7** The financial implications of Pay Award outlined above is within the inflation allowance in the current year's budget.

Interest Rates

- 3.8** 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 MPC meeting on 18 September 2025 held rates at 4.00%.
- 3.9** 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. Arlingclose's latest forecast included the following commentary: *"The MPC's sensitivity to higher inflation is partly offsetting the effect of the weak economic environment on Bank Rate expectations. However, we continue to forecast one more 0.25% rate cut in Q4 2025 to 3.75%, while recognising that uncertainty over the timing of this move has increased."*

Graph C – UK Bank of England Base Rate forecast



3.10 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.

3.11 With interest rates expected to 'sticky' during the financial year, the Council will need to ensure capital expenditure and capital financing decisions are made 'in the round.' This will ensure that existing and new capital schemes are not considered in isolation and are prioritised against the Council's Corporate Plan and reference to affordability and deliverability.

Economic Outlook

3.12 The International Monetary Fund published their World Economic Outlook update for the global economy in July 2025. The IMF forecast for the UK economy was for real terms growth of 1.2% in 2025 and 1.4% in 2026.

3.13 The IMF acknowledged this was an upward revision to their April 2025 outlook reflecting the "*front-loading ahead of tariffs, lower effective tariff rates, better financial*

conditions, and fiscal expansion in some major jurisdictions. Global inflation is expected to fall, but US inflation is predicted to stay above target. Downside risks from potentially higher tariffs, elevated uncertainty, and geopolitical tensions persist.”

4. 2026/27 BUDGET STRATEGY – ASSUMPTIONS

- 4.1** The 2026/27 Budget Strategy outlines the principles and aims for the revenue and capital budget preparation process and takes into account the need for the Council to achieve a balanced budget position and maintain financial sustainability over the medium-term.
- 4.2** The February 2025 MTFS continued to highlight a significant budget gap over the MTFS period. With the external economic environment exerting additional pressures on the council’s finances (as set out in Section 3 of the report) the budget strategy provides the framework for the Council and its service delivery partners when assessing funding priorities.
- 4.3** As set out in Section 2 of the report, many Councils are facing a significant financial challenge in setting a balanced budget for the forthcoming year. Whilst the financial challenge for Cotswold District Council is not proportionately as extreme as some other local authorities, it is still a significant challenge for the Council to address.
- 4.4** Having a clear set of budget principles for the Council to accept and work toward helps a clear framework on the journey to setting a balanced budget for the forthcoming year, as such Cotswold adopted the following principles for 2025/26 which remain sound and are a robust basis for the 2026/27 budget setting process:
- A clear focus on fulfilling the Council’s Best Value Duty (*“make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness”*). Further development and mobilisation of the continuous savings programme through the Savings and Transformation programme. Key objective is to review savings and transformation proposals to close most of the budget gap by driving out costs from the running expenditure of the Council and its service delivery partners, focused both in the short and medium term.

- The Council will not rely on the use of one-off funding sources to address recurring budgetary pressures, specifically it should not place material reliance on use of reserves for revenue purposes over the medium-term.
- Maintaining financial sustainability over the MTFS period, the Council has set a budget for 2025/26 to replenish the Financial Resilience reserve in order to mitigate the budget gap forecast from 2026/27.
- Recognising the inflationary environment the Council is currently operating in and the increase in service costs, where services are charged for, fees and charges need to be set at an optimal price, ensuing full cost recovery as a minimum.
- Ensuring the long-term viability of service provision from as stable a position as possible is vital to quality service delivery by both the district council and successor unitary council. A continued focus on budget sustainability will be key to all considerations with a reduce use of one-off measures or borrowing to fund activity.
- Recognising the capital investment priorities outlined in the Council Corporate Plan and the importance to the residents of the district, a sustainable funding solution should be developed to fund the emerging capital programme – with a specific focus on funding all new capital activity predominantly from capital receipts with minimal borrowing.

Pay and Price Inflation

- 4.5** The budget will be prepared on a 'standstill' basis in that no price inflation will be added other than to contractual commitments to pay an annual inflationary increase such as external contracts and software licence agreements.
- 4.6** Prudent provision will be made in the 2026/27 budget for the pay award to ensure the Council's budget is protected in the short-term with the broad assumptions used in the MTFS set out below.
- Publica: 3.00%
 - Ubico: 3.00% (CDC to hold an additional 1.00% in contingency)
 - CDC: 3.00%

- 4.7** Non-pay inflation will be applied to specific elements of the Ubico contract where there is a material impact on service costs and an agreed assessment of the evidence of inflationary pressures (e.g., Fuel prices).
- 4.8** The Office for National Statistics ("ONS") will publish the September CPI and RPI figures on 22 October 2025 with CPI expected to remain close to the August figure of 3.8%. These figures are used as the basis for uprating of some welfare benefits.
- 4.9** As set out above, the MTFS will include an allowance for these inflationary pressures over the medium-term and will be reviewed over the Autumn.

Fees and Charges

- 4.10** Where services are charged for, fees and charges need to be set at an optimal price, ensuing full cost recovery as a minimum. This is in accordance with Cabinet decisions included in prior year MTFS reports to *"charge for services to ensure they are not subsidised by other taxpayers."*
- 4.11** The February 2025 MTFS included an assumption for inflationary increases across key fees and charges such as Green Waste licence and Car Park fees. A report will be considered by Cabinet in January 2026 on the revised fees and charges for 2026/27.

Commercial Property Income/Asset Management

- 4.12** The Council's revenue budget for 2025/26 includes £0.460m of gross rental income from Commercial Property which provides funding for other Council services. Given the risk in holding commercial property (e.g., occupancy rates and fluctuations in the property market), income and expenditure budgets associated with the portfolio will be reviewed considering the external economic environment. This will help ensure the Council is budgeting at the appropriate level and that risks to income and expenditure changes across the medium term can be incorporate into the MTFS and Capital Programme.

- 4.13** The 2026/27 budget (as set out in the February 2025 MTFS) will be reviewed against the current position on rental income expectations with any updated forecast included in the February 2026 MTFS.
- 4.14** The Asset Management Strategy ("AMS") was adopted in May 2024. The strategy provides a longer-term view (i.e., the next 10 years) of the approach to managing the Council's land and buildings.
- 4.15** The AMS is supported by detailed asset management plans for the Land and Buildings assets it holds considering stock condition surveys and including consideration of any investment required to achieve minimum efficiency standards ("MESS"). This work is already underway with the Council considering priority areas over the coming months.
- 4.16** The budget setting process for 2025/26 set aside a proportion of commercial income in an Earmarked Reserve each year to provide an ongoing funding stream to manage the portfolio and any Asset Management requirements that are identified in the AMS.

Local Government Pension Scheme

- 4.17** The results of the March 2025 actuarial review of the Local Government Pension Scheme are due in the early autumn with a revised funding schedule for the 2026/27 to 2028/29 financial years.
- 4.18** The February 2025 MTFS included an estimated reduction in the level of employer contributions of £0.500m based on early engagement with the fund actuary and the Gloucestershire County Council pension fund administrator. At the time of writing and in the absence of the draft results from the actuary, no change has been forecast to the level of pension fund contributions assumed in February 2025.
- 4.19** Assumptions around employer contributions will not be updated until the conclusion of the actuarial review.

Interest Rates – Investments and Borrowing

- 4.20** Treasury management income remained well above budget expectations in 2024/25 with total investment income of £1.612m. Although the 2025/26 Q1 forecast for Treasury management income remains above target due to higher interest rates and cash balances, interest rates are expected to reduce further in 2025.
- 4.21** As outlined in the Treasury Management Strategy, the Council invests its surplus balances with a budgeted income return of £1.208m in 2025/26. The Strategy sets out that the Council aims to achieve a total return that is equal or higher than the prevailing rate of inflation, to maintain the spending power of the sum invested.
- 4.22** The Council has two broad classes of investments – Short-term investments (Debt Management Office and Money Market Funds where balances are held for short periods until required) and Pooled Funds.
- 4.23** The initial forecast for 2026/27 is £0.700m recognising the gradual reduction in interest rates during 2025/26 and an assumed reduction in the level of cash balances available to invest in 2026/27. This will be reviewed over the coming months with a final estimate included in the revenue budget and MTFS to be considered by Cabinet and Council in February 2026.

Government Funding

- 4.24** As outlined in Section 2 of this report, the Government have proposed fundamental changes to the Local Government Finance system supported by the Fair Funding 2.0 consultation.
- 4.25** The Government have since indicated that the Local Government Finance Settlement for 2026/27 will be a multi-year settlement, likely to cover the financial years 2026/27 through to 2028/29 (i.e. to the end of the current spending review period). A Local Government Finance policy statement is expected to be published in October/November ahead of the Autumn Budget (26 November 2025). This will include the government's response to the Fair Funding 2.0 consultation and should

provide some clarity and certainty on key aspects of funding to support budget setting and financial planning.

4.26 For the purposes of this report, it has been assumed that the overall level of Government funding remains largely unchanged for 2026/27. At the time of drafting this report, it is not possible to provide members with a credible view on what impact the proposed reforms will have on Cotswold District Council.

4.27 In preparing the estimates for this report, Pixel's MTFP model has been used to provide an indicative forecast of Government funding. However, members should view the funding levels indicated in the table below with a degree of caution. Financial modelling by Pixel and LG Futures includes a degree of interpretation of the Fair Funding 2.0 consultation document in the absence of worked examples from MHCLG.

4.28 Cotswold District Council has been identified as one of the small number of councils whose new share of funding is furthest from their current share of funding. Whilst the majority of councils will be eligible for a flat cash floor, around 40 councils may receive a negative cash floor between -5% and -7%.

4.29 MHCLG had initial conversations with these authorities in July 2025 about supporting them to manage larger losses although noting that MHCLG would still look to offer some form of funding floor in the scenario that the Council's funding floor is not set at the flat cash level.

4.30 Whilst MHCLG were keen to stress that decisions are yet to be finalised, it would seem likely from analysis undertaken by Pixel, LG Futures, and the Institute for Fiscal Studies ("IFS") that Cotswold District Council will be one of the council's most adversely affected by the proposed funding reforms. Annex C includes charts prepared by Pixel during the consultation period which illustrate the relative 'position' for the council.

4.31 For the purposes of the table below which provides an indicative funding scenario, the following broad assumptions have been applied:

- Negative cash floor in 2026/27, flat cash floor for 2027/28 and 2028/29

- New Homes Bonus abolished from 2026/27 with no new incentive.
- Full Business Rates reset for 2026/27.
- Council Tax referendum principles confirmed (2.99% or £5 increase, whichever is the higher)

Table 2 – MTFS Funding assumptions, Pixel Model (September 2025) funding forecast

	MTFS assumptions - February 2025					Pixel Model 5.16.8 (19/08/2025)			
	FINAL					-7% Cash Floor			
Funding included in MTFS	2025/26 (£'000)	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	2029/30 (£'000)	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	2029/30 (£'000)
Council Tax	7,065	7,361	7,661	7,967	8,278	7,361	7,661	7,967	8,278
Business Rates Retention (net of risk + returned funding)	5,117	2,304	2,435	2,571	2,711	2,166	2,185	2,206	2,226
Rural Services Delivery Grant	0	0	0	0	0				
Lower Tier Services Grant	0	0	0	0	0				
Funding Floor	2,230	0	0	0	0				
Services Grant	0	0	0	0	0				
New Homes Bonus	820	0	0	0	0				
New Homes Bonus (Returned Funding)	0	0	0	0	0				
Revenue Support Grant (RSG)	164	(1,704)	(1,723)	(1,745)	(1,766)	4,951	3,417	1,901	1,960
(Negative) Revenue Support Grant	0	0	0	0	0				
Transitional Protection (Damping)	0	5,141	3,541	2,041	678	0	0	0	0
Scaling back to fund damping						14	1,253	2,462	0
Extended Producer Responsibility (EPR)	1,502	751	751	751	751	0	0	0	0
Employer's National Insurance Contributions Grant	133	133	133	133	133				
Local Authority Better Care Fund						0	0	0	0
Collection Fund - CT	119	0	0	0	0	0	0	0	0
Collection Fund - NNDR	(809)	0	0	0	0	0	0	0	0
TOTAL Funding	16,342	13,986	12,797	11,718	10,784	14,492	14,516	14,535	12,464
Change in Funding Assumptions since February 2025						506	1,719	2,817	1,679

The Draft MTFS included in this report does not update the funding forecast from that set out in the February 2025 MTFS. The table above includes an estimate from Pixel of the impact from Fair Funding 2.0 but the s151 Officer does not consider this to be robust/suitable for inclusion in the MTFS at this time.

- 4.32** Whilst the indicative scenario suggests a higher level of funding over the MTFS-period than assumed in the February 2025 MTFS, this is by no means a robust forecast and will change once the government publishes its response to the consultation and the policy statement.
- 4.33** The funding scenario assumes a level of transitional protection (see row label “Scaling back to fund damping”) over the period 2026/27 to 2029/30, the level and duration of support is not certain. The February 2025 MTFS assumed a continual reduction in total funding over the MTFS-period (reducing from £13.986m to £10.784m). The scenario included in the table has a more gradual reduction (£14.492m to £12.464m).
- 4.34** Funding was made available to Local Authorities in 2025/26 following the introduction of Extended Producer Responsibility (“EPR”). The total allocation received for the 2025/26 financial year was £1.683m - £0.181m more than the initial allocation as notified and included in the 2025/26 revenue budget.
- 4.35** There has been no indication of allocations of EPR funding for 2026/27. For the purposes of this report, no funding has been assumed - it is not possible to estimate likely funding with any degree of certainty.

Council Tax

- 4.36** Section 2 of this report outlined the consultation on modernising and improving the administration of council tax. For the purposes of this report, an ‘as is’ position is assumed on billing and enforcement.
- 4.37** The assumption for 2026/27 is there is no change to the Council Tax referendum principles for shire district and borough councils – increases of Council Tax of up to 3% or £5 (whichever is higher). Should the referendum principles be amended (usually when the Local Government Finance Settlement is published), this will be considered and any recommendation included in the February 2026 MTFS.
- 4.38** The 2026/27 estimate for Council Tax assumes an increase in the number of dwellings liable for Council Tax (i.e., a 1% increase in the Taxbase) and a £5 increase in a Band D

charge for Council Tax. This falls within the permissible level of increase before triggering a local referendum and equates to an increase less than 10 pence per week for a Band D property.

4.39 At their meeting on 20 March 2024 Council approved to introduce a Council Tax premium on second homes (from April 2025) and to apply the maximum premium for Empty Homes (from April 2024) as set out in the Levelling Up and Regeneration Act 2023.

4.40 The March 2024 report proposed that the District Council's share of the additional revenue is set aside in the Council Priority: Housing Delivery reserve to facilitate the provision for additional affordable housing units across the district.

4.41 In assessing the likely level of additional Council Tax the Second Homes premium would generate, a prudent estimate has been taken due to the level of exemption that would be applied to certain properties across the district (i.e. those around Cotswold Lakes).

4.42 The Council will continue to liaise with second homeowners and Parish and Town Councils during 2025 to ensure the taxbase reflects the number of second homes in the district. The prudent estimate used for 2025.26 Council Tax setting purposes was based on information on second homes within the Council Tax revenue system.

4.43 The Empty Homes Premium is applied to dwellings which are unoccupied and substantially unfurnished with an increasing level of premium depending on the length of time the property has remained empty.

- Premium of 100% for dwellings which are unoccupied and substantially unfurnished (Empty Homes Premium) after 1 year up to 5 years of becoming empty;
- Premium of 200% for dwellings which are unoccupied and substantially unfurnished (Empty Homes Premium) between 5 years and 10 years;
- Premium of 300% for dwellings which are unoccupied and substantially unfurnished (Empty Homes Premium) for 10 years or more.

4.44 The decision to set Council Tax remains an annual decision for Council to consider when setting the budget in February.

4.45 The Council has consulted on proposed changes to the Local Council Tax Support scheme (LCTS) with changes focussed supporting more people with the cost of living and provide more support to those families with dependent children.

Business Rates

4.46 As outlined earlier in the report, the Fair Funding 2.0 proposals are dependent upon a full rest of the Retained Business Rates System from 2026/27.

4.47 Alongside the reset, a new valuation period will commence from April 2026 and will introduce new valuations for every business with the addition of further business rates multipliers, as set out in the extract below:

Multiplier structure from 2026-27

Current system (2025-26)	New system (2026-27 onward)	
Small business multiplier, all properties, RV below £51,000	Small business RHL multiplier, RHL properties only, RV below £51,000	Small business multiplier, non-RHL properties, RV below £51,000
Standard multiplier, all properties, RV £51,000 and above	Standard RHL multiplier, RHL properties only, RV £51,000 - £499,999	Standard multiplier, non-RHL properties, RV £51,000 - £499,999
	High-value multiplier, all properties, RV £500,000 and above	

The rates for the new multipliers will be announced at Budget 2025, taking account of the revaluation due in 2026, as well as the economic and fiscal context.

4.48 Therefore, forecasting of business rates income will be more complex than in previous years with less certainty given the 2026 revaluation.

- 4.49** An initial estimate of £2.304m was included in the February 2025 MTFS. This has been estimated at £2.166m within the Pixel financial model but has not been adjusted within the MTFS.
- 4.50** The Council is required to finalise its Business Rates estimates for 2026/27 and its initial estimate of any surplus or deficit for 2025/26 by 31 January 2026 which will be included in the February 2026 MTFS.
- 4.51** The Council has been a member of the Gloucestershire Business Rates Pool since April 2013. The main aim of the pool is to maximise the retention of locally generated business rates and to ensure that it further supports the economic regeneration of the wider Gloucestershire.
- 4.52** With the changes to business rates outlined above and with the impact from the Fair Funding 2.0 reforms, it is unlikely that Business Rates Pooling will be viable in 2026/27 due to the increased risk with all authorities being reset to baseline levels. There would be an imbalance in the risk and reward of pooling.
- 4.53** Therefore, for the purposes of this report it is assumed that there will be no Business Rates Pool for 2026/27.
- 4.54** However, should there be an opportunity to pool this will be considered by the s151 officers in Gloucestershire and subject to discussion with Gloucestershire Leaders and Chief Executives. Any decision on pooling (if viable) will need to be made by Full Council.

Financial Resilience Reserve

- 4.55** A Financial Resilience reserve of £1.875m was established as part of the *Draft Budget Proposals 2023-24 and Latest MTFS Forecasts* report to Cabinet in November 2022 with the intention to hold at a level that allows the Council to mitigate short-term fluctuations in income and expenditure (e.g., Business Rates, Government funding changes).

4.56 The reserve assists with mitigation of the budget gap identified in the MTFS and to facilitate profiling of a Savings and Transformation plan and support the award of the Leisure and Culture contract over MTFS period.

4.57 The projected balance on the Financial Resilience reserve (as set out in the February 2025 MTFS under the 'Do nothing' scenario) is £4.164m by the end of the 2025/26 financial year, reducing to £2.647m by the end of 2026/27.

4.58 As set out in this report, the Council must set a balanced budget for the forthcoming financial year. Whilst the Financial Resilience reserve is intended to support the Council MTFS and mitigate the budget gap identified; it should not be utilised on an ongoing basis to balance the budget.

5. 2026/27 REVENUE BUDGET AND MEDIUM-TERM FINANCIAL STRATEGY 2026/27 TO 2029/30

5.1 As set out in section 2 of this report, **a significant budget gap has been identified in the MTFS forecasts considered by Council since February 2023.** The indicative position outlined for 2025/26 through to 2028/29 was an unfunded budget gap of over £12m (including 2029/30). The Government has consulted on significant changes to the way each Council is funded through the Local Government Finance Settlement ("LGFS"), subject to the detailed LGFS, changes proposed in the consultation will take effect from April 2026.

Financial Sustainability

5.2 Ensuring financial sustainability is one if not the key issue facing all local authorities currently. Reductions in the core long-term funding Councils have received over the last decade, continued uncertainty around the timing and impact of proposed local government finance reforms (previously referred to as the Fair Funding Review), and the impact of higher levels of inflation and interest rates all contribute to the pressure on the Council's continued financial sustainability position.

5.3 For the Council to meet its legal obligation to provide statutory services and to support the priorities as set out in the Council Plan, financial sustainability must be maintained over the MTFS period.

- 5.4** There are a range of safeguards in place that help to prevent local authorities overcommitting themselves financially. These include:
- Balanced Budget requirement: England, Sections 31A, 42A of the Local Government Finance Act 1992, as amended.
 - Chief Finance Officer (CFO) duty to report on robustness of estimates and adequacy of reserves (under Section 25 of the Local Government Act 2003) when the authority is considering its budget requirement.
 - Requirements of the Prudential Code
- 5.5** These requirements are reinforced by Section 114 of the Local Government Finance Act 1988 which requires the CFO to report to all the authority's councillors if there is or is likely to be unlawful expenditure or an unbalanced budget. This would include situations where reserves have become seriously depleted, and it is forecast that the authority will not have the resources to meet its expenditure in a particular financial year.
- 5.6** Paragraphs 2.12 to 2.16 and Annex A of this report outlined the wider sector position regarding authorities in financial difficulty. It is important that members understand the legal framework which support local authority budget setting and financial sustainability.

Local Government Reorganisation and impact on Council Services

- 5.7** As outlined in Section 2 of the report, Local Government Reorganisation will have an impact on service delivery and the council's financial position over the next 2 years.
- 5.8** The Government published a white paper on Local Government in December 2024 ["English Devolution White Paper – Power and Partnership: Foundations for Growth"](#). Local government reorganisation for two-tier areas (through the creation of Unitary Councils) forms a significant part of the Government's plans.
- 5.9** Whilst it is outside of the scope of this report, Local Government Reorganisation ("LGR") proposals will have an impact on the council's Medium-Term Financial Strategy. The timeline for reorganisation in Gloucestershire is for the new unitary council(s) to be established on 01 April 2028. This means that Cotswold District Council would cease on 31 March 2028 with 2027/28 being the final financial year.

5.10 However, the MTFS is prepared on a “going concern” basis - that the council will continue to operate and meet its financial obligations for the foreseeable future regardless of LGR.

5.11 The council will continue to provide services to residents up to 31 March 2028, support the LGR process including the transition of services to the new unitary council, and must be able to remain financially sustainable.

Budget pressures

5.12 For the purposes of this report, no further budget pressures have been included in the MTFS forecast. The Finance Team is meeting with all budget holders over the coming weeks to work through detailed budget setting process including an assessment of budget pressures and cost efficiencies.

5.13 These will be reviewed and considered for inclusion in the February 2026 budget report where appropriate and subject to the wider financial position.

Savings included in the MTFS update

5.14 The *Financial Performance Report – Q1 2025/26* was considered by Cabinet at their meeting on 04 September 2025. This set out the initial outturn forecast for the current financial year and outlined the approach being taken for the council to remain financially sustainable and resilient over the medium-term.

5.15 The report outlined two key changes in the way vacancies will be managed during the financial year. 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.

5.16 A further measure for 2026/27 is to include a vacancy factor of 3% on all salary-related budgets from 2026/27. A vacancy factor is a budgeted financial percentage used to

account for anticipated employee turnover and cover additional costs like temporary staffing.

5.17 The indicative budget reduction arising from this approach with a £0.700m budget reduction expected for 2026/27 and has been included in the MTFS update within this report.

5.18 The Detailed Transition Reports for Phases 1 and 2 of the Publica Review ([Phase 1, July 2024 Item 18](#) and [Phase 2, March 2025 Item 92](#)) included the following resolution:

- Carry out a budget re-basing for the 2026/7 financial year so that the funding provided to Publica is proportionate to the services received.

5.19 An updated costing model and contract sum covering the services that are delivered by Publica has been developed and is subject to review by all partner councils. The review process will be completed over the coming weeks with changes to the council's share of Publica's cost charged through the contract sum included in the February 2026 Budget and MTFS report.

5.20 Further cost efficiencies, savings and transformation proposals have been identified and are currently being reviewed by CLT and Cabinet. These cover a wide range of areas and include working with our key service delivery partners (Publica and Ubico) to reduce cost through vacancy management.

5.21 These measures are subject to further due diligence to ensure proposals are robust and can be delivered in the timescale identified.

5.22 The Q1 report outlined the wider issues facing the council over the forthcoming financial year - 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.

5.23 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

Development of credible/robust savings and transformation proposals

5.24 An important part of the approach to maintaining financial sustainability will be to continue to deliver efficiencies and savings over the coming years. The refreshed Corporate Plan and services must be delivered within the overall resource envelope available to the Council thereby reducing reliance on earmarked reserves to support the budget.

5.25 The level of savings included in the February 2025 MTFS, and the update set out in this report does mitigate the budget gap identified for 2026/27 but does not fully close the budget gap identified for 2027/28. The Financial Resilience reserve is being used to balance the budget in the short-term and will be depleted over the MTFS period leading to a potential deficit position by 2028/29 – the point at which services transfer to the new unitary. The Council will need to address the scale of the budget gap to ensure a balanced budget can be set for 2026/27 and beyond. The position set out in this report is by no means complete and the budget gap may change due to assumptions being updated.

5.26 The CIPFA Financial Management Code (FM Code) is designed to support good practice in financial management and to assist local authorities in demonstrating their financial sustainability. The FM Code is based on a series of principles supported by specific standards which are considered necessary to provide the strong foundation to

- financially manage the short, medium, and long-term finances of a local authority
- manage financial resilience to meet unforeseen demands on services.
- manage unexpected shocks in their financial circumstances.

5.27 A key element of demonstrating financial sustainability and compliance with the FM Code is for the Council to ensure suitable mechanisms are in place around savings so

that they are identified, agreed, planned, implemented, and achieved. This will help to ensure the funding gap identified within the MTFS is addressed in a planned and managed way.

5.28 Given the scale of the financial challenge the Council is facing, the primary focus will be on Resident focused transformation and smarter internal working projects. This will help ensure adequate cost reductions are identified, scoped, and planned over the MTFS period. Savings and Transformation ideas are likely to be within the common themes already identified:

- Digitalisation - increased use of technology, using existing tech to maximum capacity, and use of AI for efficiencies.
- Resident self-service - via improved web offer, increased use of comms channels
- Workforce fit for the future – upskilling and restructuring.
- Improved systems and processes to remove waste and failure-demand grouped by workstream and indicate outcomes expected in terms of financial and service benefits and set challenging but achievable action plans for delivery by agreed periods.

5.29 These will be brought forward over the coming months once an action plan for each major workstream has been developed. Project Management support and external support may be required on individual lines of enquiry to ensure options are fully appraised prior to inclusion in the programme.

5.30 This will require careful consideration of the resources required to support and deliver a more comprehensive medium-term programme where service delivery responsibility is evolving.

5.31 Subject to further due diligence, it is anticipated that a draft programme will be included in the February 2026 MTFS with a clear delivery plan for each year. However, the programme will need to be flexible and agile to meet the financial challenge and be capable of scaling up or down to meet any emerging requirement.

Scenarios/Modelling

5.32 The MTFS update is based on the most credible expenditure, income and funding position and sets out the resulting budget gap with additional action required over the coming months to mitigate the position for 2026/27 and over the MTFS period.

5.33 With the level of uncertainty, a number of scenarios have been developed to model the impact and sensitivity on distinct levels of inflationary pressures, cost reduction measure, and income/funding options. This enhances the financial planning process and supports the Council's continued financial sustainability priority, providing a degree of flexibility over the coming months as the MTFS is reviewed and refined in advance of the formal approval of the budget and MTFS by Council in February 2026.

5.34 As set out earlier in this report and noted in external auditor Annual Reports (see [Grant Thornton report on Lessons Learned from Auditor's Annual Reports 2025](#)), Government policy has been to introduce exceptional financial support, including permitting borrowing to fund revenue shortfalls. The effect is that in-year revenue costs are being pushed onto a future generation of taxpayers, especially when coupled with special educational needs and disability statutory override.

5.35 The table below sets out the key characteristics of the scenarios that will be utilised in the development of the February 2026 MTFS.

5.36 The scenarios modelled are reasonable current/balanced (i.e., most credible), worst case (pessimistic), mid-case, and optimum financial outcome (best/optimistic).

5.37 The three alternative scenarios broadly differ from the current scenario as follows:

- **Inflation:** + or – 1.0% on Pay Award (being the single largest contributor to inflationary pressures)
- **Council Tax:** All scenarios assume Council Tax is increased by £5 per annum and the taxbase increases by 1%.
- **Business Rates Income:** assessment of growth potential following full rest of the retained business rates system in 2026/27.
- **Savings:** Scenarios will assume additional savings targets over the MTFS period.
- **Other:** funding forecasts based on the latest Pixel MTFP Model that will be available following the publication of the Local Government Finance Settlement.

Draft MTFS 2026/27 to 2029/30

- 5.38** The draft MTFS shown in the table below and Annex D is based on the most credible assumptions and forecasts of income and expenditure over the next 4 years. The uncertainty around the outcome from the Fair Funding 2.0 consultation makes it difficult to estimate with certainty the likely budget gap that the Council will need to close over the MTFS-period. However, whilst this outcome is uncertain, there is a need for the Council to ensure financial sustainability is maintained over the MTFS period and develop a robust and balanced savings and transformation plan to close the forecast budget gap.
- 5.39** It is therefore appropriate for the Council to consider a revenue budget position over the next two financial years that minimise the impact on the Financial Resilience reserve up to 2027/28.
- 5.40** The Financial Resilience reserve was relied upon during 2022/23 and 2023/24 to balance the budget (£2.103m) which was not sustainable. For 2024/25 and 2025/26 the budget and Medium-Term Financial Strategy were prepared on the basis that planned operating surpluses would be transferred to the Financial Resilience Reserve.
- 5.41** The final transfer to the Financial Resilience reserve at the end of the 2024/25 financial year was £0.778m with a surplus of £0.638m budgeted for 2025/26. The draft MTFS shows a reduction in the deficit for 2026/27. Although this remains a positive outcome at this stage of the budget setting cycle, significant further work and member decisions will need to be taken to reduce the deficit further and achieve a sustainable and balanced position for 2026/27.

Table 3 – Draft MTFS

	MTFS Period			
	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	2029/30 (£'000)
Medium Term Financial Strategy				
Opening Budget				
Service	17,359	17,359	17,359	17,359
Corporate	(1,717)	156	158	158
Net Revenue Budget	15,641	17,515	17,517	17,517
Budget Changes & Adjustments				
Provision for Inflation	629	1,268	1,903	2,557
Budget Pressures (Phase 2 FYE)	763	564	464	464
Other budget pressures	0	0	0	0
Savings	(2,097)	(2,275)	(2,436)	(2,651)
REVISED Net Revenue Budget	14,936	17,071	17,447	17,887
Funded by:				
Council Tax	(7,361)	(7,661)	(7,967)	(8,278)
Business Rates	(2,304)	(2,435)	(2,571)	(2,711)
FFR 2.0 Damping	(3,571)	(1,951)	(429)	955
EPR	(751)	(751)	(751)	(751)
Collection Fund	0	0	0	0
TOTAL Funding	(13,986)	(12,797)	(11,718)	(10,784)
Budget shortfall/(surplus)	950	4,274	5,729	7,103

Corporate Plan 2025-2028

5.42 A refreshed Corporate Plan covering the period 2025-2028 was adopted by Council at their meeting on 24 September 2025. The MTFS and Corporate planning process are aligned to ensure adequate resources are available to support the Corporate Plan priorities whilst maintaining financial sustainability over the plan period.

Balances and Reserves Strategy

5.43 A review of the Reserves and Balances strategy will be undertaken to consider the adequacy of reserves considering the continued financial risks faced by the Council. The review will consider guidance published under CIPFA Bulletin 13: Local Authority Reserves and Balances (March 2023).

5.44 The Council's financial position is supported by its balances and reserves. The requirement for financial reserves is acknowledged in statute. Sections 31A, 32 42A and 43 of the Local Government Finance Act 1992 require billing and precepting

authorities in England and Wales to have regard to the level of reserves needed for meeting estimated future expenditure when calculating the budget requirement.

5.45 The Council has a General Fund balance and number of earmarked reserves to support delivery of key priorities and financial sustainability.

5.46 The General Fund Balance will need to be maintained at a risk-assessed minimum level (currently £1.760m). The Financial Resilience Reserve balance will need to be held at a level that mitigates short-term fluctuations in income and expenditure (e.g., Business Rates, Government funding changes).

5.47 These reserves should not be utilised to fund normal, on-going service provision.

5.48 The Council holds earmarked reserves to support the priorities included in the Corporate Plan. This funding is available for investment in initiatives which support delivery against these priorities.

5.49 The table below sets out the closing position on the General Fund balance and earmarked reserves for 2024/25.

Table 4 – Balances/Reserves

	Balance 31/03/2024 (£'000)	Budgeted transfer (to)/from reserves	Transfer (to)/from reserves	Transfer between (MTFS review)	Balance 31/03/2025 (£'000)
General Fund	(1,760)	0	0	0	(1,760)
Council Priorities	(2,959)	(63)	270	0	(2,753)
Financial Resilience Reserve	(2,512)	(219)	(212)	0	(2,943)
Risk Mitigation	(550)	(1,100)	(1,307)	0	(2,957)
Ringfenced Earmarked Reserves	(57)	0	0	0	(57)
Other Revenue reserves	(2,151)	291	(583)	0	(2,443)
Subtotal Earmarked Reserves	(8,228)	(1,091)	(1,833)	0	(11,152)
TOTAL GF Balance + Earmarked Reserves	(9,988)	(1,091)	(1,833)	0	(12,912)

6. CAPITAL PROGRAMME AND FINANCING

- 6.1** The Council's Capital Strategy and Capital Programme are considered over a five-year period. The Strategy provides the framework for the Council's capital expenditure and financing plans to ensure they are affordable, prudent, and sustainable over the longer-term.
- 6.2** The Council set out its Capital Programme for the period 2025/26 to 2028/29 based on the principles of the current Capital Strategy and was approved by Council at their meeting on 24 February 2025.
- 6.3** Total capital expenditure increases to £7.744m in 2026/27, decreases to £4.208m for 2027/28 and £2.130m in 2028/29 with an estimate of £2.743m in 2029/30.
- 6.4** The 2026/2027 capital programme includes £5.171m provision for replacement of Waste and Recycling vehicles in line with the replacement programme. However, given the significant capital outlay and the potential impact from Local Government Reorganisation both the profile of this expenditure and method of financing is currently under review and will be included in the final budget proposals presented to the Cabinet and debated at Council during February 2026.

Table 5 – Capital Programme 2026/27 to 2029/30

Capital Programme	2026/27 Budget (£'000)	2027/28 Budget (£'000)	2028/29 Budget (£'000)	2029/30 Budget (£'000)	TOTAL Budget (£'000)
Leisure & Communities	500	0	0	550	1,050
Housing/Planning and Strategic Housing	1,839	2,231	1,775	1,819	7,664
Environment	5,255	1,826	205	224	7,510
ICT, Change and Customer Services	150	150	150	150	600
Shared Prosperity Fund Projects	0	0	0	0	0
Land Legal and Property	0	0	0	0	0
Transformation and Investment	0	0	0	0	0
	7,744	4,208	2,130	2,743	16,824

6.5 The capital programme is focussed on delivering against the Council's key priorities, with further schemes coming forward to on enhancing the delivery of core services through improvement and enhancement of assets. A review of the programme will be undertaken as part of the budget setting process and will be focussed on

- Affordability and deliverability of schemes
- Current capital financing resources and potential capital receipts arising from the Asset Management Strategy
- Waste Fleet Replacement programme – a detailed review of the waste fleet is underway with options to balance the service requirements and capital/revenue costs associated with the replacement and/or refurbishment of the fleet.

Capital Financing

6.6 As set out in the 2025/26 Revenue Budget, Capital Programme and Medium-Term Financial Strategy report, the Council's capital expenditure has up until the current financial year been predominantly financed from capital receipts. As these are forecast to deplete over the capital programme period the Council will need to undertake prudential borrowing to support future capital expenditure plans. Other sources of finance support the capital programme, either from external sources (government grants and other contributions), the Council's own resources (revenue, reserves, and capital receipts).

6.7 The level of prudential borrowing included in the capital financing statement reflects the financing available in the revenue budget, capital receipts align with forecasts and grant funding, and other contributions are based on already notified allocations or best estimates at the time of preparation. If additional resources become available, projects that meet the Council's strategic capital objectives will be brought forward for approval.

Table 6 – Capital Financing 2026/27 to 2029/30

Capital Financing Statement	2026/27 Budget (£'000)	2027/28 Budget (£'000)	2028/29 Budget (£'000)	2029/30 Budget (£'000)	TOTAL Budget (£'000)
Capital receipts	3,184	2,476	355	924	6,939
Capital Grants and Contributions	1,689	1,731	1,775	1,819	7,014
Earmarked Reserves	0	0	0	0	0
Revenue Contribution to Capital Outlay (RCCO)	0	0	0	0	0
Community Municipal Investments (CMI)	0	0	0	0	0
Prudential Borrowing	2,871	0	0	0	2,871
	7,744	4,208	2,130	2,743	16,824

- 6.8** The Capital Financing position will be reviewed by the s151 Officer during the year as expenditure forecasts are updated to ensure a balanced use of capital resources and mitigation of current and future interest rates.

7. RISKS AND UNCERTAINTIES

- 7.1** There are a number of financial risks that the Council will face over the medium-term. The 2025/26 Budget and the MTFS will need to be prepared with consideration of these risks, but as with any forecast, an inherent level of risk will remain.
- 7.2** The main risk is around the nature and scope of local government funding from the Government from 2026/27. The implementation of the Fair Funding Review 2.0 outcomes and Business Rates reset will have a significant impact on the council's resources as funding is reallocated across Local Government to recognise Social Care cost pressures.
- 7.3** Whilst this report uses the latest financial model provided by Pixel to assess the impact, there remains considerable risk and uncertainty remains in the estimates for 2026/27 and beyond.
- 7.4** However, an initial estimate of a near 50% reduction (from 2026/27) in the level of retained business rates income has been included in the MTFS assumptions for the last 3 years. An estimate was made around transitional arrangements, but this was not based on any indication or commitment from the Government but have been based on financial modelling provided by Pixel including a view on damping (transitional arrangements upon implementation of the new distribution methodology to avoid significant step-changes, shocks or disruption to stable financial planning and service delivery).
- 7.5** The actual funding the council will receive for 2026/27 and over the MTFS-period will not be known in detail until mid-December 2025 at the earliest.
- 7.6** Further risks remain in terms of the wider economic environment – interest rates and inflation along with projections for UK Growth over the MTFS period will have an influence on the Council's budget preparation and MTFS.

8. CONSULTATION

- 8.1** Budget Consultation will take place as part of the wider engagement with residents. As set out in the LGA Must know document:

“Formal consultation on the budget needs to be legally compliant, and that includes taking account of the government’s statutory guidance on best value. Section 3(2) of the Local Government Act 1999 states that councils must consult taxpayers, service users and other interested persons when deciding how to fulfil their Best Value duty. Although there is no specific requirement to consult widely on the budget, (the council must consult with non-domestic rates payers on its plans for expenditure under Section 65 of the Local Government Finance Act 1992), it is an important element of achieving best value and many councils take the opportunity of setting the budget to meet their statutory best value responsibility”

- 8.2** Consultation provides members with the opportunity to engage with residents on the Council’s financial position (in particular the size and scale of the financial challenge), what it will need to do to address this, and the priorities for the coming year.

9. CONCLUSIONS

- 9.1** The report sets out the Council’s financial prospects for 2026/27. Final budget proposals, including the outcome from the Local Government Finance Settlement, will be presented to the Cabinet and debated at Council during February 2026.

10. FINANCIAL IMPLICATIONS

- 10.1** There are no financial implications arising directly from the report.

11. LEGAL IMPLICATIONS

- 11.1** Save for any legal duties and requirements set out in the body of the report there are no further legal implications arising directly from the recommendations and the report.

12. EQUALITIES IMPACT

- 12.1** There are no direct implications arising from this result. The equalities impact of policy change or through the implementation of projects referred to in this report will be considered in subsequent reports to the Cabinet or Council as appropriate.

13. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

- 13.1** None

14. BACKGROUND PAPERS

- 14.1** None

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ANNEX A – EXCEPTIONAL FINANCIAL SUPPORT

- 1.1. The Government, through the Local Government Finance Settlement ("LGFS"), provided 30 councils with Exceptional Financial Support ("EFS") for the 2025.26. For 8 councils this included agreement to support for prior years. Details of the EFS provided are set out in the table below (as published on the Ministry for Housing and Local Government ("MHCLG") website: <https://www.gov.uk/guidance/exceptional-financial-support-for-local-authorities-for-2025-26>).

Local authority	EFS 2025-26	EFS Prior Years
Barnet	£55.7m (support agreed in-principle)	
Birmingham	£180.0m (support agreed in-principle)	Note: For support agreed in-principle for 2024-25, this has been revised to £490.0m (from £685.0m)
Bradford	£127.1m (support agreed in-principle)	
Cheshire East	£25.3m (support agreed in-principle)	Note: For support agreed in-principle for 2024-25, this has been revised to £17.6m (from £6m)
Croydon	£136.0m (support agreed in-principle)	Note: For support agreed in-principle for 2023-24, this has been revised to £50.0m (from £63.0m), and for support agreed in-principle for 2024-25, this has been revised to £51m (from £38m)
Cumberland	£23.439m (support agreed in-principle)	
Eastbourne	£2.0m (support agreed in-principle)	
Enfield	£10.0m (support agreed in-principle)	£20.0m (support agreed in-principle for 2024-25)
Halton	£32.0m (support agreed in-principle)	£20.8m (support agreed in-principle 2024-25)
Haringey	£37.0m (support agreed in-principle)	£28.0m (support agreed in-principle for 2024-25)
Havering	£88.0m (support agreed in-principle)	
Medway	£18.484m (support agreed in-principle)	Note: For support agreed in-principle for 2024-25, this has been revised to £23.171m (from £14.742m)



ANNEX A – EXCEPTIONAL FINANCIAL SUPPORT

Local authority	EFS 2025-26	EFS Prior Years
Newham	£51.2m (support agreed in-principle)	£16.0m (support agreed in-principle for 2024-25)
Nottingham	£25.0m (support agreed in-principle)	
Shropshire	£26.9m (support agreed in-principle for 2024-25)	
Slough	£15.709m (support agreed in-principle)	
Solihull	£32.658m (support agreed in-principle)	£15.615m (support agreed in-principle for 2024-25)
Somerset	£63.0m (support agreed in-principle)	Note: Provisionally includes revised support agreed in 2024-25, subject to final confirmation
Southampton	£89.9m (support agreed in-principle)	Note: Provisionally includes revised support agreed in 2024-25, subject to final confirmation
Stoke-on-Trent	£16.8m (support agreed in-principle)	
Swindon	£14.7m (support agreed in-principle)	
Thurrock	£72.0m (support agreed in-principle)	Note: For support agreed in-principle for 2022-23, this has been revised to £130.0m (from £40.0m agreed in February 2024), for 2023-24, this has been revised to £184.0m (from £234.5m agreed in February 2024), and for 2024-25, this has been revised to £96.0m (from £68.6m agreed in February 2024)
Trafford	£9.6m (support agreed in-principle)	
West Berkshire	£3.0m (support agreed in-principle)	£13.0m (support agreed in-principle for 2024-25)
Windsor & Maidenhead	£41.0m (support agreed in-principle)	£62.0m (support agreed in-principle for 2024-25)
Wirral	£7.5m (support agreed in-principle)	£20.0m (support agreed in-principle for 2024-25)
Woking	£74.6m (support agreed in-principle)	Note: For support agreed in-principle for 2024-25, this has been revised to £93.6m (from £95.6m)



ANNEX A – EXCEPTIONAL FINANCIAL SUPPORT

Local authority	EFS 2025-26	EFS Prior Years
Worcestershire	£33.6m (support agreed in-principle)	
Worthing	£2.0m (support agreed in-principle)	

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ANNEX B – FAIR FUNDING 2.0

- 1.1. The Department for Levelling Up, Housing and Communities (DLUHC) launched the Fair Funding Review 2.0 in June 2025. The consultation proposes a revised approach to allocating funding to local authorities in England, with implementation planned for the 2026/27 financial year. The consultation closed on 12 August 2025.
- 1.2. The House of Commons Library published a Research Briefing in July 2025 explaining the review: <https://researchbriefings.files.parliament.uk/documents/CBP-10303/CBP-10303.pdf>.

Purpose of the Fair Funding Review 2.0

- 1.3. The Fair Funding Review 2.0 outlines proposed reforms to how central government allocates funding to local authorities in England for the 2026–2029 period. It aims to address outdated funding formulas and ensure allocations better reflect current local needs, costs, and resources.

Key Components of the Review

1.4. Needs Assessment

- Uses nine Relative Needs Formulas (RNFs) to evaluate local demand for services.
- Factors include adult social care, children's services, and temporary accommodation.
- Each authority's "Need Share" is calculated as a proportion of national need.

1.5. Area Costs Adjustment (ACA)

- Adjusts funding to reflect regional cost differences.
- Includes:
 - Property and business rates
 - Labour costs
 - Travel time and remoteness.

1.6. Resources Adjustment

- Accounts for each authority's ability to raise revenue via council tax.
- Uses a notional average council tax rate to avoid incentivizing rate manipulation.



ANNEX B – FAIR FUNDING 2.0

Funding Mechanisms

1.7. Revenue Support Grant (RSG)

- Core unringfenced grant to be expanded by merging other grants (e.g., Social Care Grant, New Homes Bonus).

1.8. Consolidated Grants

- Ringfenced grants for specific services (e.g., homelessness, public health) will be grouped but not subject to the needs formula.

1.9. Business Rates Retention Scheme (BRRS)

- Will be “reset” in 2026/27 to reflect updated needs and allow authorities to retain growth in business rate revenue.

1.10. Transitional Arrangements

- Funding changes will be phased in over three years (2026–2029).
- Options include applying a “funding floor” to prevent cash losses for any authority.

1.11. Additional Proposals

- Review of local authority flexibility on fees and charges.
- Potential allocation of business rate revenue to Mayoral Strategic Authorities.
- Development of an outcomes framework to measure local authority performance.

1.12. Historical Context

- The last comprehensive needs assessment was in 2013/14.
- Since then, funding has been adjusted using flat percentages, ignoring demographic and economic shifts.
- The new review seeks to correct disparities and modernize the system.

What You Need to Know

- 1.13.** The Fair Funding Review 2.0 is a major overhaul of how England’s local authorities will be funded from 2026 onward. It introduces updated formulas for assessing need, adjusts for regional costs and revenue capacity, and consolidates grants to simplify the



COTSWOLD
District Council

ANNEX B – FAIR FUNDING 2.0

system. The goal is to create a fairer, more transparent, and responsive funding framework that reflects current realities.



ANNEX B – FAIR FUNDING 2.0

TECHNICAL SUMMARY

What Is the Fair Funding Review 2.0?

- 1.14.** It is the UK Government’s blueprint for reforming how funding is distributed to local authorities in England from 2026 to 2029. The goal? Replace outdated formulas with a system that reflects modern needs, costs, and local revenue capacity.

Core Mechanics of the New Funding Model

1.15. Relative Needs Formula (RNF)

- Nine service-specific formulas assess demand (e.g. adult social care, children’s services).
- Each authority gets a “Need Share” — its slice of national need.

1.16. Area Cost Adjustment (ACA)

- Recognizes regional cost differences in:
 - Labour markets
 - Property values
 - Travel time/remoteness

1.17. Resources Adjustment

- Measures how much revenue councils could raise via council tax.
- Uses a notional rate to avoid penalizing low-tax areas or rewarding high-tax ones.

1.18. Funding Streams Affected

- **Revenue Support Grant (RSG):** Expanded to absorb other grants like Social Care Grant and New Homes Bonus.
- **Business Rates Retention Scheme (BRRS):** Will be “reset” in 2026/27 to reflect updated needs.
- **Ringfenced Grants:** Some grants (e.g. homelessness, public health) remain outside the RNF but may be consolidated.

1.19. Transitional Protection

- Gradual rollout over three years (2026–2029).



ANNEX B – FAIR FUNDING 2.0

- A “cash flat floor” may protect councils from nominal funding cuts — but not from inflation-driven real-terms losses.
- Not all councils will qualify for this protection, raising concerns about financial sustainability².

1.20. Sector Reactions & Challenges

- **Local Government Association (LGA):** Welcomes reform but warns of risks:
 - Real-terms cuts could strain services.
 - Transitional protections must be robust.
 - Councils need flexibility over fees, charges, and spending².
- **Government Position:** Aims to end competitive bidding, simplify grants, and empower local leaders with multi-year certainty³.

1.21. Why It Matters

1.22. The Fair Funding Review 2.0 is a long-overdue overhaul of England’s local government finance system. It promises a more rational, needs-based approach — but its success hinges on how well transitional protections are handled and whether councils are given the flexibility to adapt. Expect winners and losers, and a bumpy ride for those on the wrong side of the new formulas.



ANNEX B – FAIR FUNDING 2.0

SUMMARY OF TECHNICAL ASPECTS OF THE FUNDING FORMULA

Core Funding Formula Structure

1.23. The Fair Funding Review 2.0 introduces a **multi-step allocation model** for distributing central government funding to English local authorities:

1.24. Relative Needs Formula (RNF)

- **Nine service-specific formulas** are used to estimate demand:
 - Adult social care
 - Children’s social care
 - Temporary accommodation
 - Waste collection
 - Highways maintenance
 - Public transport
 - Libraries
 - Environmental services
 - Planning and development
- Each formula uses **proxy indicators** (e.g. population age bands, deprivation indices, housing tenure) to estimate service demand.
- Outputs are normalized into a **“Need Share”**: each authority’s proportion of national need.

1.25. Area Cost Adjustment (ACA)

- Adjusts for regional variation in service delivery costs.
- Composed of three sub-indices:
 - **Labour Cost Index (LCI)**: Based on wage differentials using ASHE data.
 - **Property Cost Index (PCI)**: Reflects local commercial property rental values.
 - **Remoteness Index (RI)**: Captures travel time and accessibility using GIS data.



ANNEX B – FAIR FUNDING 2.0

- ACA is multiplicative: it scales the Need Share to reflect cost pressures.

1.26. Resources Adjustment

- Measures each authority's **notional council tax capacity**:
 - Based on **band D equivalents** and a **national average rate**.
 - Prevents perverse incentives to raise or lower actual council tax.
- The adjustment is **deducted** from the ACA-adjusted Need Share to calculate the **Core Funding Allocation**.

1.27. Grant Consolidation and Distribution

1.28. Revenue Support Grant (RSG)

- Becomes the **main unringfenced grant**.
- Absorbs:
 - Social Care Grant
 - New Homes Bonus
 - Rural Services Delivery Grant
- Distributed using the new formula (RNF + ACA – Resources Adjustment).

1.29. Ringfenced Grants

- Some grants (e.g. Public Health Grant, Homelessness Prevention Grant) remain outside the formula.
- May be **grouped into thematic blocks** but retain service-specific conditions.

1.30. Business Rates Retention Scheme (BRRS)

- **Reset in 2026/27** to align with new needs assessment.
- Authorities retain **growth above baseline**, but baseline is recalculated.
- **Safety net and levy mechanisms** are retained but thresholds adjusted.

1.31. Transitional Protection

- **Three-year glide path** (2026–2029) for funding changes.
- **Cash flat floor**: No authority receives less cash than in 2025/26.



ANNEX B – FAIR FUNDING 2.0

- **Real-terms losses possible** due to inflation and population growth.
- Authorities with **above-average council tax capacity** may lose protection.

1.32. Modelling and Data Sources

- Uses **Office for National Statistics (ONS) population projections, Ministry for Housing and Local Government (MHCLG) housing data, and NHS Digital social care statistics.**
- Formula coefficients calibrated using **regression analysis** on historical expenditure and service usage.
- ACA indices derived from **ONS, Valuation Office Agency (VOA), and Geographic Information System (GIS) datasets.**

1.33. Strategic Implications

- Ends reliance on **historic spending patterns** and flat-percentage updates.
- Introduces **dynamic, evidence-based allocation.**
- May shift funding from high-tax, low-need areas to low-tax, high-need ones.
- Encourages **multi-year financial planning** and **outcomes-based accountability.**

1.34. Technical Takeaway

1.35. The Fair Funding Review 2.0 replaces legacy funding formulas with a statistically modelled, three-part system: demand estimation (RNF), cost adjustment (ACA), and revenue offset (Resources Adjustment). It consolidates grants, resets business rates baselines, and introduces transitional protections — all underpinned by national datasets and regression-based calibration. The result is a more transparent, needs-driven funding regime, but one that may expose some councils to real-terms losses if protections are not robust.

1.36. The **Relative Needs Formula (RNF)** is the technical backbone of the Fair Funding Review 2.0. It is designed to estimate how much funding each local authority in England should receive based on the **relative demand for public services** in their area.

1.37. Structure of the Relative Needs Formula



ANNEX B – FAIR FUNDING 2.0

- 1.38. The RNF is composed of **nine service-specific formulas**, each tailored to a major area of local government responsibility:

Service Area	Key Indicators Used
Adult Social Care	Age bands (65+), disability prevalence, deprivation
Children's Social Care	Child population, child poverty, looked-after rates
Temporary Accommodation	Homelessness rates, housing tenure, benefit claims
Waste Collection	Household count, urban density
Highways Maintenance	Road length, traffic volume
Public Transport	Population density, commuting patterns
Libraries	Population, age distribution
Environmental Services	Population, housing density
Planning & Development	Planning applications, housing growth

- 1.59. Each formula uses **proxy variables** drawn from national datasets (ONS, MHCLG, NHS Digital) to estimate demand. These variables are weighted using **regression analysis** based on historical spending and service usage patterns.

1.60. Calculation Steps

1. **Indicator Selection:** Each service formula selects relevant indicators (e.g. % of elderly population for adult social care).
2. **Weighting:** Indicators are assigned weights based on statistical modelling — typically using ordinary least squares (OLS) regression to correlate indicators with past expenditure.
3. **Normalization:** The weighted scores are scaled so that each authority's score becomes a proportion of the national total — this is the **"Need Share"**.
4. **Aggregation:** The nine service-specific Need Shares are combined (with service-level weights) to produce a **composite Need Share** for each authority.

1.61. Example: Adult Social Care RNF



ANNEX B – FAIR FUNDING 2.0

1.62. The adult social care formula uses:

- % of population aged 85+
- % of population with limiting long-term illness
- Index of Multiple Deprivation (IMD) score

1.63. Each indicator is multiplied by a coefficient (e.g. 0.5 for age, 0.3 for illness, 0.2 for IMD), summed, and then normalized across all authorities. The result is a score that reflects **relative demand** for adult social care services.

1.64. Why It Matters

- **Equity:** Authorities with higher needs (e.g. older populations, more deprivation) get a larger share of funding.
- **Transparency:** The formula is published and based on measurable data.
- **Flexibility:** The government can update indicators and weights as service demands evolve.

1.65. Technical Notes

- The RNF replaces older “Four Block Model” approaches that relied heavily on historical spending.
- It avoids circularity: funding is based on **need**, not past allocations.
- It is designed to be **fiscally neutral** — total funding is fixed but redistributed based on relative scores.

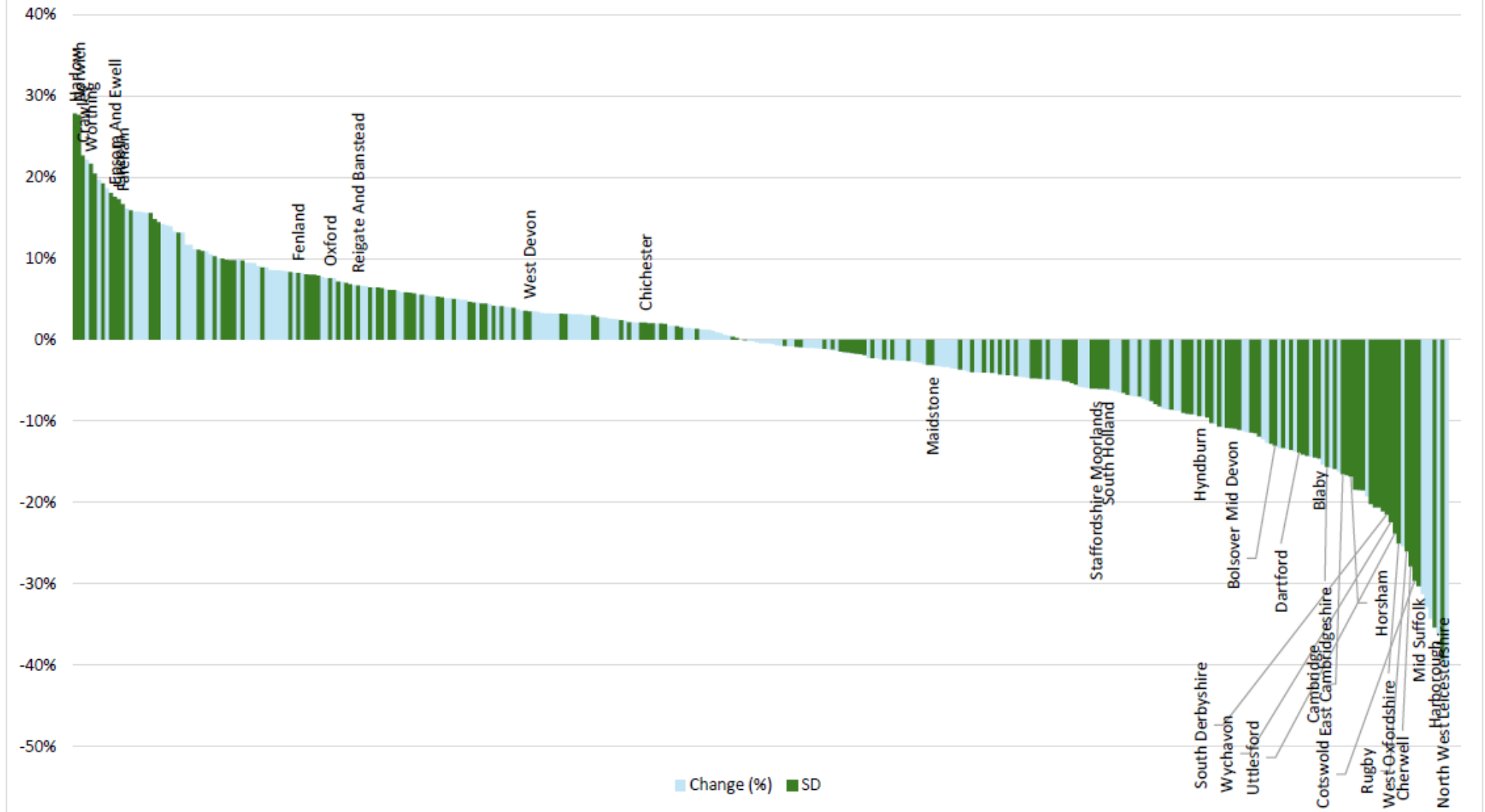
1.66. What the RNF Really Does

1.67. The Relative Needs Formula is a data-driven method for estimating how much funding each council should get based on local demand for services. It uses statistical modelling to turn demographic and socioeconomic indicators into a fair, transparent distribution of resources.



ANNEX C – FAIR FUNDING 2.0 INDICATIVE IMPACT

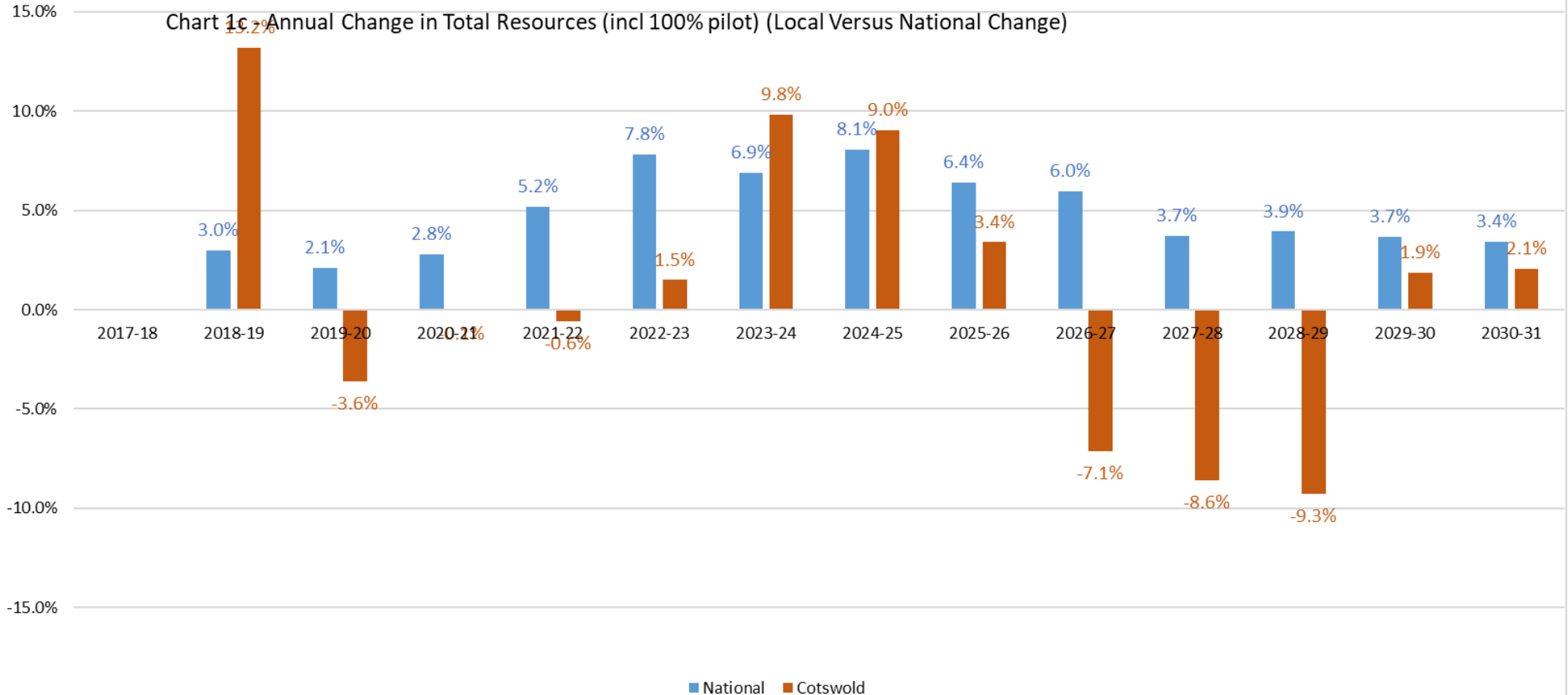
Chart 3 - Gains (+), losses (-), all local authorities (% of CSP)





ANNEX C – FAIR FUNDING 2.0 INDICATIVE IMPACT

Chart 1c Annual Change in Total Resources (incl 100% pilot) (Local Versus National Change)





ANNEX D

MEDIUM TERM FINANCIAL STRATEGY UPDATE (OCTOBER 2025)

Medium Term Financial Strategy	MTFS Period			
	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	2029/30 (£'000)
Net Service Expenditure Budgets	17,359	17,359	17,359	17,359
Corporate Items/Non Service Income & Expenditure				
Corporate Items	360	360	360	360
Treasury Management	(593)	35	(13)	(13)
Net Transfer from Earmarked Reserves	(1,485)	(239)	(189)	(189)
Provision for Inflation	629	1,268	1,903	2,557
Standstill Budget	16,270	18,782	19,420	20,074
Budget Pressures and Growth				
Publica Review	763	564	464	464
Other Budget Pressures	0	0	0	0
Subtotal	763	564	464	464
Savings and Transformation Items				
Contract Savings	0	0	0	0
Corporate Savings	(500)	(500)	(500)	(500)
Service Exepnditure Savings	(1,359)	(1,309)	(1,259)	(1,259)
Corporate Income	(25)	(25)	(25)	(25)
Fees and Charges	(213)	(441)	(652)	(867)
Savings Targets	0	0	0	0
Subtotal	(2,097)	(2,275)	(2,436)	(2,651)
Net (Savings) or Growth	(1,334)	(1,711)	(1,972)	(2,187)
Draft Net Revenue Budget	14,936	17,071	17,447	17,887
Funded by:				
Council Tax	(7,361)	(7,661)	(7,967)	(8,278)
Business Rates Retention - Local share of retained rates	(2,304)	(2,435)	(2,571)	(2,711)
Revenue Support Grant / (Negative RSG)	1,704	1,723	1,745	1,766
Extended Producer Responsibility (EPR) 2025/26 onwards	(751)	(751)	(751)	(751)
Employers National Insurance compensation	(133)	(133)	(133)	(133)
Damping (10% floor in funding reduction assumed)	(5,141)	(3,541)	(2,041)	(678)
Collection Fund - Council Tax (Surplus) / Deficit	0	0	0	0
Collection Fund - Business Rates (Surplus) / Deficit	0	0	0	0
TOTAL Funding	(13,986)	(12,797)	(11,718)	(10,784)
Budget Gap / (Surplus)	950	4,274	5,729	7,103

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ANNEX E
CAPITAL PROGRAMME 2026/2027 TO 2029/2030

Capital Programme by Service Area	2025/26 Revised Budget (£'000)	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	2029/30 (£'000)	Total £'000
Leisure and Communities						
Investment in Leisure Centres	0	500	0	0	550	1,050
CLC Pool Works	0	0	0	0	0	0
Cotswold Leisure Centre Decarbonisation [Solar PV and Triple Glazing]	0	0	0	0	0	0
Spa Pool Bourton	34	0	0	0	0	34
Community Project Grant	30	0	0	0	0	30
	64	500	0	0	550	1,114
Housing/Planning and Strategic Housing						
Private Sector Housing Renewal Grant (DFG)	1,775	1,689	1,731	1,775	1,819	8,789
Affordable Housing - Davies Road MiM (S106)	0	0	0	0	0	0
Cottsway Housing Association Loan	0	0	0	0	0	0
Bromford Joint Venture Partnership	70	150	500	0	0	720
	1,845	1,839	2,231	1,775	1,819	9,509



ANNEX E
CAPITAL PROGRAMME 2026/2027 TO 2029/2030

Capital Programme by Service Area	2025/26 Revised Budget (£'000)	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	2029/30 (£'000)	Total £'000
Environment						
Waste & Recycling receptacles	82	84	86	88	91	431
Provision for financing of Ubico Vehicles	790	5,171	1,740	117	133	7,951
In cab technology (Street Cleaning)	60	0	0	0	0	60
Fuel Bunkering (Ubico)	60	0	0	0	0	60
Electric Vehicle Charging Points	0	0	0	0	0	0
On Street Residential Chargepoint Scheme (ORCS)	183	0	0	0	0	183
Public Toilets - Card Payment (bc)	34	0	0	0	0	34
Replace/Upgrade Pay and Display	125	0	0	0	0	125
Changing Places Toilets	0	0	0	0	0	0
	1,334	5,255	1,826	205	224	8,844
Retained and Corporate:						
ICT, Change and Customer Services						
ICT Capital	150	150	150	150	150	750
Planning Documents and Scanning Solution	200	0	0	0	0	200
	350	150	150	150	150	950



ANNEX E
CAPITAL PROGRAMME 2026/2027 TO 2029/2030

Capital Programme by Service Area	2025/26 Revised Budget (£'000)	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	2029/30 (£'000)	Total £'000
UKSPF and Rural Prosperity						
UK Rural Prosperity Fund Projects	0	0	0	0	0	0
UK Shared Prosperity Fund Projects	327	0	0	0	0	327
	327	0	0	0		327
Land, Legal and Property						
Trinity Road Carbon Efficiency Works (Council March 2022)	0	0	0	0	0	0
Asset Management Strategy	672	0	0	0	0	672
	672	0	0	0	0	672
Transformation and Investment						
Trinity Road Agile Working (Council March 2022) [Includes Trinity Road Roof Repairs]	0	0	0	0	0	0
	0	0	0	0	0	0
	4,592	7,744	4,208	2,130	2,743	21,416



ANNEX E
CAPITAL PROGRAMME 2026/2027 TO 2029/2030

	2025/26 Revised Budget (£'000)	2026/27 Budget (£'000)	2027/28 Budget (£'000)	2028/29 Budget (£'000)	2029/30 Budget (£'000)	TOTAL Budget (£'000)
Capital Financing Statement						
Capital receipts	2,490	3,184	2,476	355	924	9,429
Capital Grants and Contributions	2,102	1,689	1,731	1,775	1,819	9,116
Earmarked Reserves	0	0	0	0	0	0
Revenue Contribution to Capital Outlay (RCCO)	0	0	0	0	0	0
Community Municipal Investments (CMI)	0	0	0	0	0	0
Prudential Borrowing	0	2,871	0	0		2,871
	4,592	7,744	4,208	2,130	2,743	21,416