

# Public Document Pack



**COTSWOLD**  
District Council

Tuesday, 30 December 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, 8 January 2026 at 6.00 pm.**

Jane Portman  
Interim Chief Executive

To: Members of the Cabinet  
(Councillors Mike Evemy, Juliet Layton, Claire Bloomer, Patrick Coleman, Paul Hodgkinson, Mike McKeown, Andrea Pellegram 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  
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# 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 9 - 24)**

To approve the minutes of the previous meetings held on:

1. 20 November 2025
2. 26 November 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 25 - 26)**

To note the decisions taken by the Leader and/or Individual Cabinet Members since the agenda for Cabinet 20 November 2025 was published. The following non-key decisions have been taken by individual Cabinet Members under delegated authority:

Decision taken regarding:

The approval of the procurement of examination of the Chipping Camden Neighbourhood Plan.

Date decision effective: 19 December 2025.

**8. Issue(s) Arising from Overview and Scrutiny and/or Audit and Governance (Pages 27 - 28)**

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

**9. Carers Leave Policy and Procedure and Dogs at Work Policy (Pages 29 - 62)**

Purpose:

For Cabinet to consider the implementation of two new policies:

Carers Leave Policy and Procedure – Introduces the statutory entitlement to carers' leave following recent legislative changes and outlines how the Council will support employees who need to balance work with caring responsibilities.

Dogs at Work Policy – Sets out when and how dogs may be permitted in the workplace, including the conditions and safeguards required to ensure a safe and appropriate working environment.

Recommendations:

That Cabinet resolves to:

1. Approve the Carers Leave Policy and Procedure; and
2. Approve the Dogs at Work Policy

**10. Equality, Diversity, Inclusion and Equity Policy and Procedure Update 2025**

(Pages 63 - 82)

Purpose:

To consider the Council's Equality, Diversity, Inclusion and Equity Policy and Procedure following legislative updates.

Recommendations:

That Cabinet resolves to:

1. Approve the Equality, Diversity, Inclusion and Equity Policy and Procedure, which has been rewritten to incorporate the Supreme Court Ruling.
2. Approve care experience to be treated as if it were a protected characteristic as many care-experienced people face discrimination, stigma and prejudice.
3. Delegate authority to the Chief Executive Officer to make minor and necessary amendments to the EDIE Policy, enabling timely updates that do not alter the policy's strategic intent.

**11. Corporate Enforcement Policy** (Pages 83 - 116)

Purpose:

To present Cabinet with a revised Corporate Enforcement Policy for approval and adoption.

Cotswold District Council is required to have an effective Corporate Enforcement Policy to enable officers to investigate and take action to ensure individuals and businesses comply with the law.

The policy sets out the legislative framework and principles the council will abide by when undertaking investigations to mitigate the risk of legal challenge in Court.

The policy demonstrates the council's consideration of necessity, proportionality and public interest when deciding on enforcement action and demonstrates openness and transparency for residents, Councillors and employees.

Recommendations:

That Cabinet resolves to:

1. Approve and adopt the Corporate Enforcement Policy attached to this report.

2. Delegate authority to the Chief Executive to approve future minor amendments to the Policy, in consultation with the Leader of the Council, Head of Service Counter Fraud and Enforcement Unit, Relevant Heads of Service and the Head of Legal Services.

12. **Enforcement Agent Commissioning** (Pages 117 - 128)

Purpose:

To seek approval to initiate a procurement process to tender for the provision of Enforcement Agent services.

Recommendations:

That Cabinet resolves to:

1. Approve the process to undertake a procurement exercise to appoint enforcement agent services for the council
2. Note that the procurement exercise will be undertaken via a Dynamic Purchasing System; and in partnership with five other Local Authorities.

13. **Fees and Charges 2026/27** (Pages 129 - 154)

Purpose:

The purpose of this report is to present a revised schedule of fees and charges for 2026/27. The report also describes the rationale for the revised charges compared to current charges for 2025/26. Revised charges are presented at Annex A alongside current charges for 2025/26.

Recommendations:

That Cabinet resolves to:

1. Endorse the rationale for revising fees and charges as set out in the report;
2. Approve the delegation of future decisions regarding the setting of Special Area of Conservation Fees to the Head of Planning Services in consultation with the Deputy Leader and Cabinet Member for Housing and Planning;
3. Approve the changes to car parking arrangements detailed in section 4 of the report to align with the Car Parking Strategy approved on 20 November 2025; and
4. Approve the implementation of revised fees and charges for 2026/27 as detailed in Annex A from 1 April 2026.

14. **Council Priority and Service Performance Report 2025-2026 Q2.** (Pages 155 - 218)

Purpose:

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

Recommendation:

That Cabinet resolves to:

1. Note overall progress on the Council priorities and service performance for 2025-26 Q2 (July-September 2025)

15. **Financial Performance Report 2025-26 Quarter 2** (Pages 219 - 254)

Purpose:

This report sets out the second quarterly budget monitoring position for the 2025/26 financial year.

Recommendations:

That Cabinet resolves to:

1. Review and note the financial position set out in this report.
2. Approve the additional transfers to earmarked reserves as set in paragraph 4.11 of the report.
3. Endorse the principle to transfer 100% 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.
4. Approve the reallocation of the UKSPF capital budget as follows:
  - a. £0.229m to Rural England Prosperity
  - b. £0.060m to UK Shared Prosperity Fund (UKSPF Capital)

This results in a net reduction of £0.038m, in line with allocations from Government.

16. **CDC Strategic Risk Register Q2.** (Pages 255 - 264)

Purpose:

To set out the current Strategic Risk Register for the Council.

Recommendations:

That Cabinet resolves to:

1. Note the Strategic Risk Register and mitigation measures.
2. Endorse the proposal for the strategic risk register to be included in the work programme for the committee with a quarterly review frequency.

17. **Community Infrastructure Levy - CIL Bid Recommendations** (Pages 265 - 386)

Purpose:

A multidisciplinary officer panel has reviewed the Community Infrastructure Levy (CIL) funding bids received in 2025 and made recommendations as to which bids should receive funding for the 2025 bid period. To ensure impartiality, Council officers were invited via email, the staff portal and staff newsletter to volunteer to take part in the panel, subject to a conflict-of-interest declaration. This report provides summaries of those bids and officer feedback. Its purpose is to ask the Cabinet to agree officer recommendations for funding relevant bids and refuse funding for bids which are not suitable for funding currently.

This is the second time since becoming a CIL charging authority in 2019 that the Council has received bids for funding. Upon receipt, a proportion of CIL goes direct to the district's neighbourhoods (parish meetings/councils and town councils) and the remainder goes to the Council's Strategic CIL fund. The bids subject of this report are requesting funding from the Strategic Fund. The amount of CIL funding bids for this year was greater than the amount of available funds in the CIL Strategic Fund.

The multidisciplinary officer panel has made its recommendations based on the statutory requirements for CIL spending in the CIL Regulations 2010 (as amended) and to ensure that CIL is spent:

- Legally
- Responsibly
- Strategically
- Accountably

Recommendations:

That Cabinet resolves to:

1. Agree to allocate funding for the following bids, as set out in Table 4:
  - a) Cycle parking Cotswold National Cycle Network (GCC with Walk Wheel Cycle Trust)
  - b) Farmor's School 3G Pitch (Farmor's School)
  - c) Redesdale Hall Phase 2 (Redesdale Hall Trust)
2. Delegate authority to the Assistant Director Planning Services in consultation with the Cabinet member for Housing and Planning, to progress funding for approved bids in consultation with Legal Services and in line with the existing process.

## 18. **Fleet Replacement Programme** (Pages 387 - 410)

Purpose:

- To review the Capital Fleet Replacement Programme and identify the vehicles for replacement in 2026/27.
- To agree the next steps towards the decarbonisation of the waste services.

Recommendations:

That Cabinet resolves to:

1. Approve the replacement of vehicles in line with the updated Capital Fleet Replacement Programme (Paragraph 5.3) up to a total of thirty-one vehicles.
2. Approve steps towards the decarbonisation of waste services through the purchase of one electric kerbside-sort vehicle (one of the thirty-one

vehicles identified above) and a shift to using Hydrotreated Vegetable Oil (HVO) as a replacement to diesel.

3. Include the reprofiled capital expenditure for 2026/27 in the Capital Programme that will be considered by Cabinet and Council in February 2026.

(END)

# Agenda Item 3



**COTSWOLD**  
District Council

Cabinet  
20/November2025

## Minutes of a meeting of Cabinet held on Thursday, 20 November 2025

Members present:

Mike Evemy

Patrick Coleman

Andrea Pellegram

Claire Bloomer

Paul Hodgkinson

Mike McKeown

Tristan Wilkinson

Juliet Layton (virtual attendee)

Officers present:

Andrew Brown, Head of Democratic and  
Electoral Services

Angela Claridge, Director of Governance  
and Development (Monitoring Officer)

Jane Portman, Interim Chief Executive  
Officer

Claire Locke, Executive Director Corporate  
Services

Nickie Mackenzie-Daste, Senior Democratic  
Services Officer

David Stanley, Deputy Chief Executive and  
Chief Finance Officer

Kira Thompson, Election and Democratic  
Services Support Assistant

Susan Hughes, Business Manager for  
Support and Advice

Maria Wheatley, Shared Parking Manager

Paul Lankester, Principal Environmental  
Health Officer

### 152 Apologies

Apologies were received from Councillor Juliet Layton, who could not attend in person but would attend virtually.

### 153 Declarations of Interest

In the interest of transparency, Councillor Andrea Pellegram stated that she was the owner of a house in multiple occupation, noting that it was not a licensable property. Councillor Pellegram added that she would be speaking on item 10, Private Sector Housing.

It was noted that there was no conflict of interest.

**154 Minutes**

The purpose of this item was to consider two sets of minutes of Cabinet :

a) Cabinet held on 16 October 2025

Two minor amendments were noted and corrected in the minutes.

- A typographical error in item 138, member questions and
- The clarification on item 143, Cotswold District Local Plan (2011-31) Regulation 18 Consultation that the previous housing requirement had been fewer than 500 per year.

The recommendation to approve the corrected minutes was proposed by Councillor Mike Evemy and seconded by Councillor Patrick Coleman.

RESOLVED that, subject to the above amendments the minutes of the meeting of the Cabinet held on 16 October 2025 be approved as a correct record.

<b>To approve the minutes of a meeting of Cabinet held on 16 October 2025 (Resolution)</b>		
RESOLVED that, subject to the above amendments the minutes of the meeting of the Cabinet held on 16 October 2025 be approved as a correct record.		
For	Patrick Coleman, Mike Evemy, Paul Hodgkinson, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	6
Against	None	0
Conflict Of Interests	None	0
Abstain	Claire Bloomer	1
<b>Carried</b>		

b) Extraordinary Cabinet held on 11 November 2025

The recommendation to approve the minutes was proposed by Councillor Mike Evemy and seconded by Councillor Patrick Coleman.

RESOLVED that the minutes of the meeting of the Cabinet held on 11 November 2025 be approved as a correct record.

<b>To approve the minutes of a meeting of Cabinet held on 6 November 2025 (Resolution)</b>		
RESOLVED that the minutes of the meeting of the Cabinet held on 6 November 2025 be approved as a correct record.		
For	Claire Bloomer, Patrick Coleman, Mike Evemy, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	6
Against	None	0
Conflict Of Interests	None	0
Abstain	Paul Hodgkinson	1
<b>Carried</b>		

## **155 Leader's Announcements**

The Leader made one announcement and reported that the Local Plan consultation had gone live and would close at one minute to midnight on 2 January 2026. The public were encouraged to take part and share their views on the future of development in the district. It was noted that the council magazine was due to be delivered to all households the following week, featuring a double-page spread with comments from Councillor Juliet Layton, Cabinet Member for Housing and Planning on the significance of the consultation.

The Leader confirmed that four in-person events would be held for residents to speak with officers, all sessions would run from 2.00 pm to 7.00 pm.:

- Mickleton on 28 November;
- Moreton on 5 December;
- Fairford on 11 December;
- Cirencester on 18 December,

It was noted that full details and the consultation questions were available on the Council's website and the public were encouraged to submit their views. The results of the consultation would be reviewed in the new year.

## **156 Public Questions**

There were no public questions.

## **157 Member Questions**

There were no member questions.

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

The purpose of the report was for Cabinet to note the decisions taken by the Leader and/or Individual Cabinet Members since the agenda for Cabinet 16 October 2025 was published.

It was noted that the following non-key decisions had been taken by the Cabinet Member for Housing and Planning, Councillor Juliet Layton under delegated authority:

1. Deputy Leader and Cabinet Member for Housing and Planning - Decision meeting 8 October 2025

Decision taken regarding:

The Cotswold District Council response to Gloucestershire County Council on the draft Gloucestershire Local Nature Recovery Strategy consultation (LNRS).

Cabinet  
20/November2025

The Cabinet Member for Housing and Planning considered the recommendations within the report, noted that the consultation had followed due process and resolved that it would be appropriate to agree to finalise and submit the suggested draft consultation response.

2. Deputy Leader and Cabinet Member for Housing and Planning - Decision meeting 8 October 2025

The response to Moreton-in-Marsh Town Council regarding their Reg. 14 Neighbourhood Plan.

The Cabinet Member for Housing and Planning considered the report and resolved to:

- a) Agree to send the suggested response to Moreton in Marsh Town Council.
- b) Authorise officers to continue their support in aiding Moreton in Marsh Town Council in the preparation of their Neighbourhood Plan outside this formal consultation response.

Date decisions effective: 20 October 2025.

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

There were no recommendations from the Overview and Scrutiny Committee and no matters raised by the Audit and Governance Committee.

**160 Car Parking Strategy 2025-2028**

The purpose of the report was to present Cotswold District Council's Parking Strategy for 2025–2028 which outlined the approach to managing and delivering off-street parking services to 2028.

Councillor Paul Hodgkinson, Cabinet Member for Health, Culture and Visitor Experience introduced the report and highlighted that the purpose of the strategy was to deliver a positive parking experience for residents, visitors, and businesses, supporting the local economy, contributing to sustainability, and preparing for future changes in local government governance in Gloucestershire, while supporting the Council's strategic objectives through to 2028.

It was reported that the Council managed 20 off-street car parks with 2,279 spaces and 24 electric vehicle charging points, noting that despite support for active travel, many residents relied on cars due to the district's rural nature. It was noted that the strategy was based on extensive data analysis of usage and stay times, as well as a community consultation, surveys, and meetings with parishes, towns, businesses, lobby groups, and residents.

Four themes were focussed on: understanding parking needs, understanding customer needs, preparing for future demand, and setting out options and actions. Feedback on on-street parking had also been recorded but would be passed to Gloucestershire County Council, as it fell under their responsibility.

It was explained that, given the expected local government reorganisation and the Council's anticipated end in May 2028, the plan prioritised tactical actions for the next two and a half years. These included reviewing stay times and turnover to ensure suitable short- and long-stay provision, with a specific proposal for Bourton-on-the-Water involving free parking for residents before 10.00 am by shifting charging hours from 8:00 am–6:00 pm, to 10:00 am–8:00 pm.

Further priorities were highlighted: installing new payment machines, supported by a £40,000 budget; expanding electric vehicle charging infrastructure where feasible; introducing a tourist levy in the Maugersbury Road car park in Stow-on-the-Wold, following the successful model in Bourton-on-the-Water; and continuing engagement with town and parish councils to support local parking initiatives.

Cabinet Members noted and praised the report, highlighting the extensive consultation with residents and town and parish councils and the collaborative approach taken by the team. They congratulated the Cabinet Member and the team on their work, specifically citing initiatives such as the introduction of two hours of free parking in Bourton, the rollout of 24 EV charging points across multiple towns and villages including Tetbury, Bourton-on-the-Water, and Stow-on-the-Wold, and the tourism levy, which had been informed by public consultation and voting. They highlighted that the Bourton tourism levy, generating approximately £65,000 annually, had been used to refurbish the village green, improve block paving, fund the village warden, and support additional parking enforcement, helping the community manage the impacts of volume tourism.

Cabinet Members recognised the challenges of over-tourism, particularly during peak seasons and extreme weather, and emphasised the importance of strategies to support local villages and maintain access to services. They welcomed the consideration of neighbourhood plans in shaping local parking and tourism strategies, and highlighted the funding and financial planning achievements, including the anticipated £40,000 funding gap for new car park ticket machines being covered by additional receipts from parking.

Cabinet Members also praised the environmental and practical benefits of the EV infrastructure, noting that it supported residents without off-street parking, reduced carbon emissions, and improved visitor experience. They acknowledged the hard work of the parking team and climate officer in delivering these projects and welcomed the modernisation of car park machines.

Cabinet

20/November2025

Councillor Hodgkinson summed up by saying that the strategy focused on quick improvements, updated stay times, new machines, civic pride in the appearance of car parks, and ensuring a smooth handover to future authorities. He concluded by thanking the officers who had worked on the strategy over the previous 18 months. It was confirmed that the team were looking forward to putting the recommendations into place.

The recommendations were proposed by Councillor Paul Hodgkinson and seconded by Councillor Andrea Pellegram.

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

Voting Record:

7 For, 0 Against, 0 Abstentions.

### **To approve and adopt the Cotswold District Council Parking Strategy and Action Plan 2025-2028 (Resolution)**

RESOLVED that Cabinet:

1. Approved and adopted the Cotswold District Council Car Parking Strategy 2025 -2028 at Annex A.
2. Approved and adopted the Car Parking Action Plan also at Annex A of the strategy.
3. Instructed Officers to draft and consult on a variation to the Parking Order and subject to responses make the variation in consultation with the Cabinet Member for Health, Culture and Visitor Experience to change stay time restrictions in Rissington Road Car Park to support residents and meet demand. And approve the costs of £2,000 for the necessary changes.
4. Delegated authority to Publica Executive Director of Corporate Services in consultation with the Cabinet Member for Health, Culture and Visitor Experience to consider consultation feedback on the variations to the Parking Order and decide whether to make the variation to the Order in whole or to abandon the proposal and to agree any further minor amendments to the parking order.
5. Noted the additional capital budget (£40,000) identified in the report to upgrade and replace existing parking machines with modern technology.
6. Approved the introduction of a tourism levy in Maugersbury Road car park Stow-on-the-Wold to generate funds specifically dedicated to dealing with the impact of tourism on the town subject to the statutory parking order process.

For	Claire Bloomer, Patrick Coleman, Mike Evemy, Paul Hodgkinson, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	7
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

## **161 Private Sector Housing and Mobile Homes Sites policy update.**

The purpose of the report was to ask Cabinet to consider and renew the Private Sector Housing Renewal Policy and Mobile Homes Policy.

Councillor Andrea Pellegram, Cabinet Member for Environment and Regulatory Services, introduced the report, which presented updated Private Sector Housing policies covering Houses in Multiple Occupation (HMOs) and Mobile Homes site licensing.

Councillor Pellegram thanked officers, particularly Paul Lankester, for their work.

It was noted that the Cotswold District Council Private Sector Housing Renewal Policy, had last been updated in 2013 and that the new version was required revision to reflect administrative and legislative changes.

The revisions reflected these changes, including new mobile homes regulation and the Renters Rights Act 2025. The policies aligned with the Council's Housing Strategy, Enforcement Policy and Long-Term Empty Homes Strategy, and set out commitments to improving private housing conditions, working with partners to maintain standards, supporting the return of long-term empty homes to use, and addressing unlicensed HMOs.

The policy aimed to ensure residents lived in safe, compliant homes, primarily within the private rented sector, and sought to work with landlords to improve housing standards. Councillor Pellegram also referenced the 2023 English Housing Survey, noting that 10.2% of private rented homes nationally were non-decent, while in the Cotswolds the figure was 9.5%, and emphasised the Council's commitment to reducing this. The requirement to maximise the stock of private rented housing by bringing empty homes back into use was highlighted, noting that 921 properties were currently vacant, many long-term. Councillor Pellegram further noted that there were an estimated 54 larger HMOs requiring registration and reiterated previous Cabinet decisions to work with landlords of licensable HMOs and issue civil penalties if necessary.

It was noted that the Mobile Homes Policy updated regulation of residential mobile home parks, introduced new fees for registering fit and proper persons and site licences, and established a Council-maintained register of fit and proper persons managing these sites. Councillor Pellegram recommended that Cabinet support both policies as important measures for the protection of residents.

Cabinet Members welcomed the report and praised the updated policies, noting:

- The importance of properly regulating residential mobile home parks, particularly for vulnerable and elderly residents.
- Practical issues, such as elderly residents struggling to manage waste disposal.

Cabinet

20/November2025

- Officers explained that during the winter months inspections would focus on residential parks, with non-compliance first addressed by giving operators the opportunity to remedy issues, followed by compliance notices if necessary, in line with the Council's enforcement policy.
- While licensing was required for holiday and touring sites, legislation did not allow the Council to charge a licence fee, except for residential parks. It was noted that this meant the Council bore the cost of regulating holiday parks and it was suggested that a letter could be sent to the relevant minister to request legislative change.

Councillor Tristan Wilkinson seconded the proposal and supported the focus on residential mobile homes, noting that residents often felt underrepresented and marginalised, with limited access to services. Councillor Patrick Coleman added that park homes provided low-cost housing in the countryside and could contribute towards housing targets.

Cabinet Members expressed support for the policy updates, noting the practical benefits for residents and the importance of effective regulation, and proceeded to the vote on the recommendations proposed by Councillor Andrea Pellegram 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.

<b>To approve the Private Sector Housing Strategy and Mobile Homes Policy (Resolution)</b>		
RESOLVED that Cabinet:		
1. Approved the Private Sector Housing Strategy as set out in Annex A;		
2. Approved the Mobile Homes Policy as set out in Annex B;		
3. Approved the setting of Fees for applications for Fit and Proper Person Assessment and the annual fee for any monitoring required.		
For	Claire Bloomer, Patrick Coleman, Mike Eevemy, Paul Hodgkinson, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	7
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

## **162 Infrastructure Funding Statement**

The purpose of the report was to inform Members of the Cotswold District Council Infrastructure Funding Statement (IFS) for 2024/2025 and to seek Cabinet approval for its publication.

The Director of Communities and Place, Helen Martin introduced the report, which informed Members of the statutory requirement to publish the Infrastructure Funding Statement (IFS) for 2024/2025, summarising developer contributions secured, received, spent and held during the year. The report also identified forthcoming infrastructure requirements that were expected to be financed through CIL and Section 106 funding.

Members' attention was drawn to the fact that, although the Council collected the funding, it was not always the delivery agent. Significant sums were routinely transferred to external partners—such as the County Council and the Integrated Care Board—who were responsible for delivering specific projects. It was further noted that 15% or 25% of neighbourhood CIL funding—depending on whether a parish had an adopted neighbourhood plan—was transferred to town and parish councils twice yearly. Although the council did not direct how these funds were spent, parishes were required to report annually on their use. The report provided a summary of all CIL and Section 106 obligations, with the full statement offering a detailed breakdown of contributions, expenditure, and balances held.

Cabinet Members welcomed the report and highlighted the value that CIL and Section 106 funding brought to local communities. It was noted that the Infrastructure Funding Statement clearly demonstrated the financial benefits of development for communities, particularly as the Council prepared a Local Plan consultation. It was noted that neighbourhoods had received approximately £305,000 in CIL during the previous year and more than £962,000 had been spent on Section 106 projects, along with £90,000 of direct CIL expenditure. These investments represented improvements that did not require additional local taxation.

Cabinet sought clarification on clawback periods, asking whether CIL was subject to the same five-year spending deadline typically applied to Section 106 funds. Cabinet noted the importance of keeping parish and town councils informed, particularly where staff turnover might lead to a loss of understanding about spending requirements. Officers confirmed that the council monitored unspent neighbourhood allocations, including small remaining sums, and that a more proactive support programme was being developed. This included helping parishes identify potential infrastructure projects, encouraging collaboration across boundaries, and ensuring councils remained aware of spending deadlines and opportunities to make the best use of CIL and Section 106 funding.

Cabinet

20/November2025

Cabinet noted:

- the practical benefits of CIL, with reference to a CIL-funded feasibility study for a major cycle route connecting local settlements to a railway station.
- that some parishes were now receiving unusually large sums due to high levels of housing development. It was suggested that additional officer support would help smaller councils plan and manage this funding effectively.
- That investment in affordable housing was welcome.
- CIL funding could only be used for capital projects and not for revenue purposes, meaning it could not be used to subsidise bus services, which remained the responsibility of the County Council.
- Several transport schemes were being considered for CIL funding. Some previously approved schemes had not yet received transfers because the County Council had not requested the funds, but they were included in the Infrastructure Funding Statement.
- in the current financial year, the Council had received multiple bids for transport-related funding and had begun working more closely with the County Council on future schemes.
- An infrastructure list had been developed, informed by evidence-based documents such as the county's Local Cycling and Walking Implementation Plan, to identify potential projects and match them with available CIL funding.
- that Councillors were invited to share any infrastructure schemes they felt should be considered, which would be included in an infrastructure tracker—a live, evolving document—to support the development of the Council's Infrastructure Delivery Plan and help ensure that transport schemes aligned with local priorities.

Cabinet expressed strong support for the positive impact that CIL and Section 106 funding was having across the district, while also calling for continued clarity and communication to ensure communities maximised these financial opportunities.

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:

7 For, 0 Against, 0 Abstentions.

<b>To agree to publish the Cotswold District Council Infrastructure Funding Statement (IFS) for 2024/25 (Resolution)</b>
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RESOLVED that Cabinet:

1. Noted the content of the Infrastructure Funding Statement (IFS) attached at Annex A,
2. Endorsed the document to be published on the Council's website by 31 December 2025 in accordance with legislative requirements.

For	Claire Bloomer, Patrick Coleman, Mike Eevemy, Paul Hodgkinson, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	7
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

### **163 Adoption of the Tackling Domestic Abuse Strategy**

The purpose of the report was to seek Cabinet's adoption of the 'Gloucestershire Tackling Domestic Abuse Strategy', which highlighted the importance of different agencies across the county working together to address domestic abuse.

Councillor Paul Hodgkinson, Cabinet Member for Health, Culture and Visitor Experience introduced the report, and advised that the Gloucestershire Domestic Abuse Local Partnership Board had prepared a countywide strategy for 2025–28. As a partner, the District Council played a key role through its housing functions and wider resident-facing services.

Cabinet was asked to approve the adoption of the Gloucestershire Tackling Domestic Abuse Strategy for 2025–2028. It was reported that the strategy set out a clear and ambitious collective plan to address domestic abuse, which was recognised as a serious issue affecting communities across Gloucestershire. It was noted that in the previous year, Gloucestershire Constabulary had recorded a 32% increase in domestic abuse-related crimes compared to the prior year, and domestic abuse now accounted for nearly one in five of all reported crimes across the county.

The strategy had been shaped by the voices of survivors and focused on five key priorities: prevention and early intervention, multi-agency working, workforce development, provision of support services and safe accommodation, and tackling perpetrators to break the cycle of abuse. It was noted that contributions to the strategy came from public health, education, and social care budgets, as well as funding from the Integrated Care Board and the police. The strategy also recognised the needs of all victims, including men, boys, children, older adults, LGBTQ+ individuals, and those from minority communities, in line with the Domestic Abuse Act and national commitments to reduce violence against women and girls.

Cabinet Members welcomed the strategy and emphasised its importance. Councillors spoke of personal experience, highlighting the long-term impact of domestic abuse and the need for public recognition of hidden suffering. It was also noted that abuse

Cabinet

20/November2025

was not always physical, acknowledging the significance of mental abuse, and stressed the importance of support for all victims, including LGBTQ+ individuals.

The importance of addressing perpetrator behaviour to break the cycle of abuse was highlighted and the role of housing officers in supporting victims to access safe accommodation was recognised. It was further noted that all licensed taxi and private hire drivers Council had received safeguarding training, enabling them to identify and respond to potential abuse.

The strategy was described as a comprehensive and collaborative approach, informed by survivor experiences, evidence-based interventions, and multi-agency cooperation, with a focus on both supporting victims and preventing future abuse. Cabinet noted the significance of domestic abuse in the county and expressed support for the adoption and implementation of the strategy.

The recommendations were proposed by Councillor Paul Hodgkinson and seconded by Councillor Claire Bloomer.

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

Voting Record:

7 For, 0 Against, 0 Abstentions.

<b>To adopt the Gloucestershire Tackling Domestic Abuse Strategy 2025-28. (Resolution)</b>		
Cabinet RESOLVED to adopt the Gloucestershire Tackling Domestic Abuse Strategy 2025-28.		
For	Claire Bloomer, Patrick Coleman, Mike Evemy, Paul Hodgkinson, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	7
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

For	Claire Bloomer, Patrick Coleman, Mike Evemy, Paul Hodgkinson, Mike McKeown, Andrea Pellegram and Tristan Wilkinson	7
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

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#### **164 Next Meeting**

The next meeting of Cabinet would be on 26 November 2025 at 6:00 pm or on rising of Full Council.

The Meeting commenced at 6:00 pm and closed at 7:05 pm.

(END)



Cabinet  
26/November2025

## **Minutes of a meeting of Cabinet held on Wednesday, 26 November 2025**

Members present:

Mike Evemy (Leader)

Claire Bloomer

Patrick Coleman

Paul Hodgkinson

Mike McKeown

Andrea Pellegram

Officers present:

Andrew Brown, Head of Democratic and  
Electoral Services

Angela Claridge, Director of Governance  
and Development (Monitoring Officer)

Jane Portman, Interim Chief Executive  
Officer

Helen Martin, Director of Communities and  
Place

Nickie Mackenzie-Daste, Senior Democratic  
Services Officer

David Stanley, Deputy Chief Executive and  
Chief Finance Officer

Julia Gibson, Democratic Services Officer

Observers:

Councillor Nikki Ind

### **165 Apologies**

Apologies were received from Councillor Juliet Layton and Councillor Tristan Wilkinson.

### **166 Declarations of Interest**

The Monitoring Officer confirmed that in accordance with Section 33 of the Localism Act 2011 and the Council's Code of Conduct, members who were also elected to Gloucestershire County Council or any Town or Parish Council ("double-hatted" members) could participate in the debate on matters relating to Local Government Reorganisation (LGR) proposals, provided that they approached the discussion with an open mind. The Monitoring Officer also advised that prior expression of a view on LGR proposals did not automatically preclude participation, subject to the member remaining open to persuasion during the meeting.

Furthermore, members who had previously declared their membership of another local authority in their Register of Interests were not required to repeat this declaration at the Cabinet meeting.

There were no declarations of interest from Members.

**167 Leader's Announcements**

There were no announcements from the Leader.

**168 Public Questions**

There were no public questions.

**169 Member Questions**

There were no member questions.

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

The Leader gave some background to the Overview and Scrutiny Committee recommendation and tabled the Chair's formal response.

It was noted that while the government had provided some funding to support councils to the current stage of the LGR process, implementation of LGR changes would be the responsibility of councils themselves, with no additional central funding. All costs would have to be covered by savings in other areas, with expenditure upfront and savings realised later.

The report considered by the Committee estimated Cotswold District Council's share at £2m. It was noted that this number was still subject to discussion with the other councils. The Deputy Chief Executive & Section 151 Officer had recommended prudently allocating this amount to cover the Council's share of reorganisation costs.

In response to the recommendation from the Overview and Scrutiny Committee, it was confirmed that regular periodic updates would be provided to the Overview and Scrutiny Committee and decisions would remain open to scrutiny as usual. It was further noted that Councillor Patrick Coleman and the Deputy Chief Executive and S151 Officer, would consider the level of financial provisions to be allocated at budget time.

No further comments were raised by Members.

The formal response to the Overview and Scrutiny Committee's recommendation was published online during the meeting.

## **171 Consideration of Local Government Reorganisation Submission**

Councillor Mike Evemy, Leader of the Council introduced the item which was the consideration of the Local Government Reorganisation (LGR) submission.

It was noted that all Members had been present at Full Council, where the options for Local Government Reorganisation had been debated at length. Council had unanimously resolved in favour of requesting that Cabinet propose a single unitary authority for Gloucestershire, the only unanimous decision among the Gloucestershire councils, with the remaining councils reaching majority decisions.

The Leader thanked Cabinet colleagues and Council Members for their decision. It was noted that Council had requested that Cabinet propose the single unitary option in response to the Minister's invitation of 5 February 2025, and had further asked the Leader to send an accompanying letter setting out the reasons for the decision, based on the Full Council debate and Cabinet's discussion. Council had also requested that Cabinet and officers continue to prepare for LGR ahead of the expected government decision in June or July 2026.

Cabinet was required to determine its proposal. The Leader stated that, on balance, the single unitary option appeared to be in the best interests of the District and its residents. Reference was made to the Full Council debate, which had emphasised the resilience of services, the vulnerability of users of SEND and adult social care, the importance of financial sustainability, and the £10m difference in ongoing savings between the available options. Concerns had also been expressed regarding the long-term viability of a two-unitary split.

It was noted that Cabinet decisions were usually subject to a five-day call-in period by the Overview and Scrutiny Committee; however, Members of the Overview and Scrutiny Committee had agreed to support call-in being disallowed in this case.

Members were invited to comment. Councillor Coleman commended the careful, evidence-based approach taken throughout the process. Councillor Hodgkinson endorsed these remarks and expressed his support for the single unitary option, citing the Fire Service as a strong example of unified service delivery.

Councillor Evemy concluded by noting that significant work lay ahead, with increasing Member involvement required. He reported that four councils in the county supported the single unitary option, one supported the Greater Gloucester option, one supported the East/West split and one had expressed no preference. These three options would therefore go forward for consideration, after which the government would determine viability. Should the Greater Gloucester option be deemed viable, it would be considered; however, it was considered more likely that the single unitary and

Cabinet

26/November2025

east/west options would proceed to consultation, with a decision expected from government in June or July 2026.

The recommendations were proposed by Councillor Mike Evemy and seconded by Councillor Paul Hodgkinson.

Vote:

6 For, 0 against, 0 Abstentions.

**Proposal of a single unitary option for Gloucestershire (Resolution)**

Cabinet RESOLVED to :

1. Propose the single unitary council option for Gloucestershire in response to the ministers invitation on 5 February 2025.
2. Treat the decision as urgent under Part D6, paragraph 4.14 of the Constitution, and therefore dis-apply the call-in procedure, on the grounds that any delay likely to be caused by the call-in process would prejudice the Council's and the public's interests.

For	Claire Bloomer, Patrick Coleman, Mike Evemy, Paul Hodgkinson, Mike McKeown and Andrea Pellegram	6
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
<b>Carried</b>		

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**172 Next Meeting**

The next Cabinet meeting was scheduled for 8 January 2026 at 6:00 pm.

The Meeting commenced at 6.00 pm and closed at 6.17 pm

(END)



**Cabinet – 8 January 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'.

Cabinet Member	Meeting date	Subject	Decision(s)
Deputy Leader and Cabinet Member for Housing and Planning	11/12/2025	Approval of the procurement of Examination of the Chipping Campden Neighbourhood Plan.	The Deputy Leader and Cabinet Member for Housing and Planning considered the proposed recommendations and resolved that: Cotswold District Council would procure through a bid process an independent examiner, suitably qualified and experienced, to undertake examination of the Chipping Campden Neighbourhood Plan. The appointment must be consented by



		<p>the qualifying body (Chipping Campden Town Council). It was noted that the Regulation 16 consultation had been completed, and all documents had been prepared and were ready for examination following all due process.</p> <p><a href="#"><u>Cotswold District Council - Agenda for Deputy Leader and Cabinet Member for Housing and Planning Decision Meeting on Thursday, 11th December, 2025, 9.30 am</u></a></p>
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## **Matters arising from Audit and Governance Committee.**

Meeting Date: 04 December 2025.

<b>Matter arising to be noted by Cabinet</b>	<b>Lead Officer</b>
<p>1. As outlined in the updated Strategic Risk Register report presented to Cabinet on 8 January 2026, the strategic risk register will be reviewed quarterly by Cabinet. Beginning in January 2026, three quarterly reports—finance, service, and risk—will be presented together with a single covering report, aligned to the broader service and financial performance reporting cycle.</p> <p>As part of their remit under the Constitution, the Audit and Governance Committee agreed that the quarterly strategic risk register report should be added to their work plan.</p>	David Stanley  Democratic Services
<p>2. The Committee identified that procurement did not figure on the strategic risk register. The lead officer confirmed that procurement would be added to the next report.</p> <p>The Committee welcomed the addition of procurement to the Strategic Risk Register and noted that it would be part of the forthcoming review in April 2026.</p>	David Stanley

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# Agenda Item 9



**COTSWOLD**  
District Council

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET 8 JANUARY 2026</b>
Subject	<b>IMPLEMENTATION OF TWO NEW POLICIES</b> <b>1. CARERS LEAVE POLICY AND PROCEDURE AND</b> <b>2. DOGS AT WORK POLICY</b>
Wards affected	None
Accountable member	Cllr Mike Evemy, Leader of the Council Email: <a href="mailto:mike.evemy@cotswold.gov.uk">mike.evemy@cotswold.gov.uk</a>
Accountable officer	Angela Claridge, Director of Governance and Development Email: <a href="mailto:angela.claridge@cotswold.gov.uk">angela.claridge@cotswold.gov.uk</a>
Report author	Carmel Togher, HR Business Partner Email: <a href="mailto:carmel.togher@cotswold.gov.uk">carmel.togher@cotswold.gov.uk</a>
Summary/Purpose	Cabinet to consider the implementation of two new policies: <ol style="list-style-type: none"> <li>1. Carers Leave Policy and Procedure – Introduces the statutory entitlement to carers' leave following recent legislative changes and outlines how the Council will support employees who need to balance work with caring responsibilities.</li> <li>2. Dogs at Work Policy – Sets out when and how dogs may be permitted in the workplace, including the conditions and safeguards required to ensure a safe and appropriate working environment.</li> </ol>
Annexes	Annex A – Carers Leave Policy and Procedure Annex B – Equality and Rurality Impact Assessment Form (Carers Leave Policy and Procedure) Annex C- Dogs at Work Policy Annex D- Equality and Rurality Impact Assessment Form (Dogs at Work Policy)



Recommendation(s)	That Cabinet resolves to: a) Approve the Carers Leave Policy and Procedure and b) Approve the Dogs at Work Policy
Corporate priorities	• Delivering Good Services
Key Decision	NO
Exempt	NO
Consultees/ Consultation	The Carers Leave Policy and Procedure and Dogs at Work Policy have been shared with the two recognised trade unions of Unison and GMB. The policies have also been shared internally with the Cotswold District Council Culture Club.



## **1. EXECUTIVE SUMMARY**

**1.1** The Carers Leave Policy and Procedure has been drafted to ensure that we comply with legislation. The policy sets out the statutory right of employees to carer's leave to provide or arrange care for a dependent with a long-term care need, and other support that we offer to combine work with care. We recognise the challenges that carers face while trying to balance the demands of caring, work, and looking after their own health. We are committed to doing what we can to help ensure the health and wellbeing of employees with caring responsibilities is looked after.

**1.2** The Dog at Work Policy sets out the circumstances in which dogs are allowed to be in the workplace. We recognise the challenges that being a responsible dog owner presents and that usually dogs require daily exercise, affection and companionship. As a Council we are committed to providing a safe, productive and respectful workplace and we believe that having dogs present would present significant challenges to this commitment for staff, visitors and councillors. There are only a limited set of circumstances in which dogs are permitted to be in the workplace.

**1.3** HR Policies provide general and practical advice and guidance for managers and staff on a range of employment issues. The policy supports fairness and consistency across the Council and helps to protect the Council against legal claims.

## **2. BACKGROUND**

**2.1** Regular policy review and revision need to be carried out on a regular basis and in line with employment law updates in April and October. Delegated authority to make reasonable amends was given to the Chief Executive Officer of Cotswold District Council.

## **3. MAIN POINTS**

**3.1** A Carers Leave Policy and Procedure has been drafted to set out the statutory right of employees to carer's leave. A carer is anyone with caring responsibilities who provides care, assistance and support to any other individual who may be seriously ill or unable to care for themselves. The amount of carer's leave that you can take is up to one week (pro rata) in any 12-month rolling period. It can be taken in one block, as individual days or as half days. Carers leave is unpaid.



- 3.2** The Dogs at Work Policy states clearly that dogs are not permitted on Council premises during working hours. The exception is in accordance with the Equality Act 2010 where the Council will make reasonable adjustments to support staff with disabilities. Assistance dogs are fully exempt from this policy and are permitted access to all areas of the workplace. The Council is responsible for making reasonable adjustments to ensure that the employee and their assistance dog are safe and comfortable in the workplace.
- 3.3** HR policies provide legal protection for the Council. Clear guidance is provided that reflects employment law and regulations and can help mitigate risk for the Council.

#### **4. ALTERNATIVE OPTIONS**

- 4.1** Not having a clear policy may put the Council at risk of challenge and not being compliant with legislation.

#### **5. CONCLUSIONS**

- 5.1** The policies have been drafted to ensure the Council is legally compliant.

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

- 6.1** The introduction of the two policies outlined in this report is not anticipated to result in any significant financial burden for the Council. Existing resources are expected to accommodate the changes without requiring additional funding or staffing.

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

- 7.1** The Employment Rights Act 1996 provides for the right to unpaid carers' leave (section 80J & K), as further specified in the Carer's Leave Regulations 2024.
- 7.2** Regulation 4 of the Carer's Leave Regulations 2024 defines "carer" and requires notice to be served from the carer on the employer before leave can be taken. Regulation 5 entitles carers to up to one working week of leave for caring duties over the last 12 months, the minimum period to be taken being half a day. Any shorter period would be covered by the Council's flexi policy.
- 7.3** There is no requirement in legislation to allow pets in the workplace, except when linked to a disability.



**7.4** Both policies intend to bring into place the latest legislation, which the Council is required to comply with.

## **8. RISK ASSESSMENT**

**8.1** By not updating and implementing these policies, the Council may fail to comply with employment legislation, namely the Carer's Leave Act 2023 and The Equality Act 2010 and leave itself exposed to costly employment law cases.

## **9. EQUALITIES IMPACT**

**9.1** An Equality Impact assessment has been undertaken, and the policy has been considered to ensure compliance with the Equality Act 2010 and the Public Sector Equality Duty.

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

**10.1** There are none arising.

## **11. BACKGROUND PAPERS**

None

(END)

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## Carers Leave Policy and Procedure

### 1. Introduction

Cotswold District Council (CDC) prides itself on being an employer of choice. With an incredibly varied role in delivering the very best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

This policy sets out the statutory right of employees to carer's leave to provide or arrange care for a dependant with a long-term care need, and other support that we offer to combine work with care.

We recognise the challenges that carers face while trying to balance the demands of caring, work, and looking after their own health. We are committed to doing what we can to help ensure the health and wellbeing of employees with caring responsibilities is looked after.

The policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

### 2. Scope

This policy applies to employees employed by CDC. It does not apply to workers, contractors, consultants or any self-employed individuals working for the Council.

### 3. What is a carer?

A carer is anyone with caring responsibilities who provides care, assistance and support to any other individual who may be seriously ill or unable to care for themselves. You may acquire caring responsibilities overnight or they may develop over time.

Carers might find it difficult to distinguish their caring role from the personal relationship they have with the individual they are caring for, be it a relationship with a spouse, civil partner, child, parent, or friend. Therefore, some employees may not immediately identify themselves as a carer.

The activities that carers undertake are wide ranging, including but not limited to:

- Help with personal care
- Help with mobility
- Managing medication

- Practical household tasks
- Emotional support
- Help with financial matters or administration

#### 4. Requesting support

We recognise that caring can be unpredictable, emotionally taxing, and a topic that not everyone finds easy to talk about. However, we encourage you to speak with your manager about any particular issues that you are experiencing to ensure that you are provided with the right support.

Although you are not required to share evidence or the details of who you care for and their needs, being as open as possible about your caring responsibilities helps us to explore how we can support you with any challenges you are facing. If for any reason you are unable to approach your manager, you can speak to HR.

Any information disclosed by you during discussions with your manager or HR will be treated sensitively and in strict confidence.

#### 5. Entitlement to carer's leave

Whatever your length of service, you have a statutory right to take carer's leave to provide or arrange care for a dependant if they have a long-term care need.

In the context of statutory carer's leave, a dependant can include:

- Your husband, wife, civil partner, partner, child or parent
- Any person who lives in the same household as you (other than as a lodger, tenant, boarder or employee)
- Any other person who would reasonably rely on you to provide or arrange care, such as an elderly neighbour

A dependant has a long-term care need if they have any of the following:

- An illness or injury (whether physical or mental) that requires, or is likely to require, care for at least 3 months
- A disability as defined under the Equality Act 2010
- Require care for a reason connected to their old age

This statutory right to carer's leave applies to a wide range of caring situations, but excludes general childcare, except where your child meets the definition of a dependant with a long-term care need.

#### 6. What carer's leave can be used for

Examples of when carer's leave could be used include, but is not limited to:

- Taking your disabled child to a hospital appointment
- Moving your parent who has dementia into a care home
- Accompanying a housebound dependant on a day trip
- Providing meals and company for an elderly neighbour while their main carer is away with work for the day

## 7. Amount of carer's leave you can take

The amount of carer's leave that you can take is up to one week in any 12-month rolling period.

A week of carer's leave is the same duration as your normal working week, meaning that a full-time employee is entitled to 5 days' carer's leave in any 12-month rolling period. If you are contracted to work 3 days per week, for example, you will be entitled to 3 days of carer's leave, and so on.

You can take the leave in one continuous block, as individual days, or as half days.

If you are caring for more than one dependant, you do not have a separate entitlement to carer's leave for each dependant.

## 8. Notice to take carer's leave

If you need to take carer's leave, you should submit your notice via email to your manager and HR.

We ask that you give as much notice as possible when requesting carer's leave so that we can plan for your absence. In any event, you must give notice in advance that is either twice the number of working days that you wish to take as carer's leave, or 3 days, whichever is earlier.

If you are unable to give the correct notice, approval will be at the discretion of your manager. Alternatively, you may be able to request emergency leave under our Time off for dependants' policy.

All carer's leave must be approved in advance by your manager.

## 9. Pay during carer's leave

Any leave taken as carer's leave is unpaid.

All other benefits will remain in place. For example, holiday entitlement continues to accrue and pension contributions will continue to be paid.

## 10. Postponing your carer's leave

While every effort will be made to meet your request, we may postpone a period of carer's leave if we consider that your absence will disrupt business operations.

If a decision is taken to postpone your leave, your manager will consult with you to find an alternative leave period within one month of the carer's leave period originally requested.

Your manager will write to you within 7 days of receiving your notice, clarifying the reason for the postponement and the revised dates on which the carer's leave can be taken.

## 11. Cancelling your carer's leave

You can cancel your carer's leave and take it at a different time as long as you let your manager know before your leave has started.

You cannot cancel any carer's leave that has already begun.

## 12. Our commitment to you

Following your carer's leave, you have the right to resume working in the same job as before on terms and conditions that are no less favourable than the terms that would have applied had you not been absent. Your continuity of employment is not affected.

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have taken, sought to take, or made use of the benefits of carer's leave.

If you are told not to take or request carer's leave, or you believe that you have been subjected to detrimental treatment because you have taken or requested carer's leave, you should report the matter to HR. Alternatively, you can raise it under our Grievance policy and procedure.

Any such behaviour will not be tolerated and may be treated as a disciplinary offence

## 13. Other types of leave

The statutory right to carer's leave is intended to be for planned and foreseen caring commitments. If you need to take time off to manage an unexpected or sudden problems relating to a dependant and make any necessary longer-term caring arrangements, please see our Time off for dependants' policy.

We recognise that you may need a longer period off work that goes beyond your statutory entitlement to carer's leave under this policy. In such cases, we may agree for you to take the time off work as annual leave.

We realise that flexible working can help navigate the challenges of caring while working. We enable a wide range of flexible working practices within the workplace. If you feel that you would benefit from a change to your working arrangements to help balance your work and caring responsibilities, we encourage you to look at our Flexible working policy.

If you feel that you would benefit from a temporary change to your working arrangement on an ad hoc basis, you should discuss and agree this with your manager.

## 14. External sources of help

There are various organisations that provide help and support to carers, including:

- [Carers UK](#), which provides help and advice for carers on employment rights, benefits and tax credits, assessments, and other practical matters for carers
- the [NHS website](#), which provides a wealth of information and advice for carers
- [Grace Care Consulting](#), which provides advice and support on care, special needs and neurodiversity
- [Age UK](#) and [Independent Age](#), which offer information and support to anyone providing informal unpaid care to an older person through a range of local services
- [Contact a Family](#), which provides support, advice and information to families with disabled children
- [Carers Trust](#), which works with other organisations to provide access for carers to breaks, information, advice, education, training and employment opportunities

<b>Version Control:</b>	
<b>Document Name:</b>	Carers Leave Policy and Procedure
<b>Version:</b>	1.0
<b>Responsible Officer:</b>	HR Business Partners
<b>Approved by:</b>	Cabinet
<b>Date First Approved:</b>	TBC
<b>Next Review Date</b>	TBC (annually)

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## Equality and Rurality Impact Assessment Form

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

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

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

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

**1. Persons responsible for this assessment:**

Names: Carmel Togher	
Date of assessment: 30 <sup>th</sup> September 2025	Telephone: 01285 623482 Email: <a href="mailto:carmel.togher@cotswold.gov.uk">carmel.togher@cotswold.gov.uk</a>

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

Carers Leave Policy and Procedure

Is this a new or existing one? New

**3. Briefly describe its aims and objectives**

This policy sets out the statutory right of employees to carer's leave to provide or arrange care for a dependant with a long-term care need, and other support that we offer to combine work with care.

We recognise the challenges that carers face while trying to balance the demands of caring, work, and looking after their own health. We are committed to doing what we can to help ensure the health and wellbeing of employees with caring responsibilities is looked after.

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

This policy links to relevant legislation and guidance, namely the Carer's Leave Act 2023. This provides for one week of unpaid leave per year for employees who are providing or arranging care for a dependant.

## 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	<input type="checkbox"/>	
Comparisons between similar functions / policies elsewhere	<input type="checkbox"/>	
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	<input checked="" type="checkbox"/>	Carers Leave Act 2023

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

This policy has been drafted due to legislative change. No additional research material needs to be explored in order to meet this objective.

## 7. Has any consultation been carried out?

Yes

## Details of Consultation

The recognised trade unions of GMB and Unison have been cited on this policy. Council staff in the CDC Culture Club Group have also been approached for feedback on the contents.

If NO please outline any planned activities

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

Page 43

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>
LOW – Few members of the general public/staff will be affected by this proposal	<input checked="" type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>

Comments: e.g. Who will this specifically impact?

The policy applies to employees employed by CDC, specifically those with carer responsibilities. It does not apply to workers, contractors, consultants or any self-employed individuals working for the Council.

## 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		x		We seek to support and empower our employees, to give their best. We recognise the challenges that carers face while trying to balance the demands of caring, work, and looking after their own health. We are committed to doing what we can to help ensure the health and wellbeing of employees with caring responsibilities is looked after.	
Age – Old People		x		See above	
Disability		x		See above	
Sex – Male		x		See above	
Sex – Female		x		See above	
Race including Gypsy and Travellers		x		See above	
Religion or Belief		x		See above	
Sexual Orientation		x		See above	
Gender Reassignment		x		See above	
Pregnancy and maternity		x		See above	
Geographical impacts on one area			x	See above	
Other Groups		x		See above	
<b>Rural considerations:</b> ie Access to services; leisure facilities, transport;		x		See above	

education; employment; broadband.					
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## 10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale
Update Policy in line with legislative requirements	Carmel Togher	Brightmine HR & Compliance Centre provides trusted proactive updates, leading practices and tools to help organisations reduce risk and strengthen their HR strategies.	Yearly

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

No
----

**Declaration**

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where 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:	Carmel Togher	Date:	30 <sup>th</sup> September 2025
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Line Manager:	Angela Claridge	Date:	30 <sup>th</sup> September 2025
Reviewed by Corporate Equality Officer:	Cheryl Sloan	Date:	7 October 2025



## Dogs At Work Policy

### 1. Introduction

Cotswold District Council prides itself on being an employer of choice. With an incredibly varied role in delivering the absolute best for our residents, communities and businesses, our employees are committed and really make a difference. In return we seek to support and empower our employees, to give their best.

This policy sets out the circumstances in which dogs are allowed to be in the workplace.

We recognise the challenges that being a responsible dog owner presents and that usually dogs require daily exercise, affection and companionship.

As an organisation, we are committed to providing a safe, productive and respectful workplace and we believe that having dogs present would present significant challenges to this commitment for staff, visitors and councillors.

Therefore, there are only a limited set of circumstances in which dogs are permitted to be in the workplace, however, we will support dog (and other pets) ownership in other ways, recognising that owning pets is a personal choice, but also often usually brings significant benefits to health and wellbeing.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

### 2. Scope

This policy applies to employees employed by Cotswold District Council and also nonemployees such as contractors, consultants or any self-employed individuals working for the organisation on site.

Whilst this policy refers to 'dogs' it includes all animals.

### 3. General Policy

Dogs are not permitted on company premises during working hours. This includes, but is not limited to:

- Open office areas
- Reception
- Meeting rooms
- Shared or communal spaces
- Council-owned vehicles
- Any premises or spaces visited as part of your role.

#### 4. Exceptions

##### a. Assistance Dogs

In accordance with the Equality Act 2010, Cotswold District Council will make reasonable adjustments to support staff with disabilities. **Assistance dogs** (e.g., guide dogs, hearing dogs) are fully exempt from this policy and are permitted access to all areas of the workplace.

##### **Definition of assistance dog**

An assistance dog is a dog that has been trained to assist a person with a specific disability and that has been accredited by one of the organisations registered as a member of Assistance Dogs (UK). The registered organisations include:

- Guide Dogs.
- Hearing Dogs for Deaf People.
- Support Dogs.
- Dogs for Good.
- Canine Partners.
- The Seeing Dogs Alliance.
- Dog AID; and
- Medical Detection Dogs.

A full list can be found at: [Find an Assistance Dog Charity - ADUK](#)

Assistance dogs support people with a wide range of disabilities, including those relating to visual, hearing or mobility, and other conditions, for example epilepsy or autism.

Assistance dogs have **formal identification tags** and are allowed to accompany their owner at all times and in all places within the UK (unless there is a genuine health and safety risk).

Assistance dogs are fully trained working animals, not pets, and their owners rely on them for both independence and mobility. Assistance dog owners will have received full training on how to manage their animal. As the working life of an assistance dog is about six years, a dog owner could have several dogs during their lifetime.

Other types of dogs that are NOT registered assistance dogs.

### **Emotional Support Dogs**

While there is no doubt that an assistance dog provides companionship, an emotional support dog is a dog that offers comfort and companionship simply by being present, which requires no specialist training.

### **Therapy Dogs**

Therapy dogs and their owners usually visit a wider group of people who might be in a hospital ward, a school classroom, a nursing home etc. to provide comfort and support.

## 5. Process for introducing an assistance dog.

### **New starters**

If a new starter already has an assistance dog, they should make the HR onboarding team aware of this and the team will notify the Head of HR.

### **Current staff**

If a current staff member becomes the handler of an assistance dog (or knows that they will soon become a handler) they should discuss it with their manager and contact the Head of HR.

In both cases the Head of HR will:

- Request documentation from the handler regarding the registration and training of the assistance dog.
- Contact the H&S Lead to arrange for a risk assessment.
- Discuss with the staff member appropriate communication around the presence of the dog in the workplace.

- Meet with the handler/employee and their manager to discuss any other requirements to support the handler/employee with their assistance dog (for example time off for appointments, training needed for other staff, familiarisation sessions for the assistance dog) etc. See Appendix 1 for the Assistance Dog Checklist and Plan
- All documentation will be recorded in the employee's file and a review meeting should be scheduled in with the employee in no less than 6 months to check that everything is working well.

#### Visitors of staff

Where possible all employees and users of the building should be informed in advance if there is a visitor with an assistance dog and given any instructions/information that will ensure the visit goes smoothly.

Where it is not possible to give advance warning and information, staff should treat the visitor and their assistance dog with the same dignity and respect that we expect to be extended to all visitors and colleagues.

If you have a concern – please speak to your manager in the first instance, or if that is not possible, please contact your Head of HR.

#### 6. Handler/Employee responsibilities

It is the responsibility of the handler/employee to ensure that any legal requirements in the keeping of animals are met (e.g. The Animal Health Act and subsequent regulations require dogs to wear a collar with the owner's name and address).

Further responsibilities include cleaning up after their dog, supervising the dog, and ensuring the dog does not disturb coworkers or damage property.

The handler/employee is responsible for ensuring that the dog is fully vaccinated, wormed, and in good health. If the dog is unwell the handler/employee should stay away from the workplace until the dog is well. The employee/handler will need to speak to their manager about work arrangements during this time.

#### 7. Our responsibilities

We are responsible for making reasonable adjustments to ensure that the employee and their assistance dog are safe and comfortable in the workplace. This may include, but is not limited to:

- Ensuring the dog has space to rest.
- Giving the employee additional time to take the dog outside for toilet breaks

- Allowing time off for further dog training or vet appointments
- Training staff and other third parties in how to interact with the dog.

We will ensure that sufficient public liability insurance is in place that covers staff bringing an assistance dog into the workplace.

## 8. External sources of help

If further support is needed with accommodating assistance dogs in the workplace, these are some potential sources of help:

[Find an Assistance Dog Charity - ADUK](#)

<https://assistancedogregistry.co.uk>

[Support Dogs](#)

ADUK can provide a training session which will equip participants with the knowledge and confidence to ensure an accessible and welcoming experience for Handlers and their dogs. The manager of the employee bringing an assistance dog will be able to arrange this training for the team to attend.

If this policy has raised any issues for you and you need some emotional support, details of emotional support available for you can be found here: [Wellbeing Advocates - Cotswold District Council Portal](#)

<b>Version Control:</b>	
<b>Document Name:</b>	Dogs at Work Policy
<b>Version:</b>	1.0
<b>Responsible Officer:</b>	Head of HR
<b>Approved by:</b>	
<b>Date First Approved:</b>	
<b>Next Review Date</b>	
<b>Retention Period:</b>	

## Appendix 1

### **Supporting an Assistance Dog and their Handler: Checklist and Plan**

This checklist should be completed by the Assistance Dog Handler with their manager.

The H&S Lead and/or Head of HR or any other relevant parties may be consulted.

If the Assistance Dog Handler moves to a new manager, the new manager must be fully updated and given a copy of this Checklist and Plan.

If the Handler has a NEW Assistance dog, a new checklist and plan should be completed.

<b>Name of Handler:</b>	
<b>Name of Manager:</b>	

<b>Name of Dog:</b>	
<b>Gender of Dog:</b>	
<b>Type of Assistance Dog (if known):</b>	

<b>Date plan completed:</b>	
<b>Date for review:</b>	

#### **Part One – Day to Day**

Will the dog need a separate fob sign in, or is the dog assumed to be in the building once the owner signs in?

What will the dog be wearing to indicate that they are an assistance dog?

What facilities or equipment will the dog handler bring with them to work for their dog? (e.g. bowl, bed, toy)

Where will these be kept?

Where will the dog be placed whilst the handler is working? (e.g. lying/sitting under the desk/next to the desk)

Will the dog remain on a lead during these rest times?

If the dog needs to eat food during the day, where will this be? (e.g. next to the desk, in a designated area, in a break-space etc.)

Does the dog need regular access to water?

Where will the water be provided/accessed by the dog?

When moving around the building together, are there any additional considerations?

Will the dog handler be attending any meetings (internally or externally)?

What are the arrangements for the dog in the meetings? (e.g. sitting/lying next to the handler)

Will the dog be required to make any noises or signals during the working day to assist their owner? YES / NO

Do people need to be notified about this? YES / NO

If YES, who needs to be notified, what do they need to be told, and who will do this?

Are there any further considerations? Give details:

## **Interaction with the dog**

Can people speak to the dog?

Can people touch the dog?

Are there any dos and do nots relating to the dog? (e.g. regards feeding and treats)

Has this been communicated? Please give details:

## **Toileting**

Where and when will the dog go to the toilet?

Are there any further considerations around this?

Please give details:

## **Communication about the dog**

Is there a plan to communication to all staff about the dog and agree a 'feedback window'?

(consideration many need to be given if anyone reports that they are allergic to dogs or have a phobia of dogs, and a plan put in place)

Please give details of the proposed communication plan and the timings:

## **Medical Emergency Plan**

Please give details of what should happen if the owner feels unwell (e.g. if they need to go home but cannot follow their usual travel plans):

Please give details of what should happen if the owner is taken to hospital:

Should the dog go with the handler if allowed?

Who will temporarily take care of the dog if the dog cannot go with the handler?

Who should be contacted?

## **Emergency Evacuation Procedure**

If the alarm sounds, it is expected that the owner and dog will follow the usual emergency evacuation procedure and proceed to the meeting point.

Should the emergency be critical. Should anything be done differently? (e.g. should the dog be carried?)

Has this been communicated to the team? Give details:

Has the been communicated to the Fire Marshall?

Give details:

### **Further Support for the Handler, Dog and Staff**

Is there a specific organisation that provides support and information relating to the assistance dog? Give details:

### **Any other information**

Is there anything else that would be useful for us to know or to consider?

## Appendix 2

### FAQs for Dogs in Work

Q My usual dog walker has let me down at the last minute – can I bring my dog into work just as a one-off?

A Unfortunately not. We only allow assistance dogs in the workplace for reasons explained. You will need to make alternative arrangements for your dog or speak to your manager and see if you can reach an agreement to work from home as a one-off.

Q Does the policy apply to other animals

A Yes, we only allow assistance dogs in the workplace and no other animals

Q I see my cat as a therapy cat – can they come into work

A No, only recognised assistance dogs are allowed in the workplace

Q What about if I am working from home

A It is your personal choice whether to have animals or pets in your home. You must ensure that they do not distract you or distract others from work. The occasional appearance of a pet on a Teams call is not a problem.

Q I am not keen on dogs – do I have to accept an assistance dog coming into work

A Assistance dogs enable people with disabilities to have jobs so it is really important that we are supportive. Assistance dogs are specially trained and are chosen for their gentle, compliant and clever natures. We will work with you to discuss your worries and concerns and see if there are ways, we can support you to be at work with an assistance dog around.

All assistance dogs in the workplace will be properly vaccinated, wormed etc.

## Equality and Rurality Impact Assessment Form

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

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

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

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

**1. Persons responsible for this assessment:**

Names: Carmel Togher	
Date of assessment: 30 <sup>th</sup> September 2025	Telephone: 01285 623482  Email: <a href="mailto:carmel.togher@cotswold.gov.uk">carmel.togher@cotswold.gov.uk</a>

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

Dogs At Work Policy
Is this a new or existing one? New

**3. Briefly describe its aims and objectives**

<p>This policy sets out the circumstances in which dogs are allowed to be in the workplace.</p> <p>We recognise the challenges that being a responsible dog owner presents and that usually dogs require daily exercise, affection and companionship.</p> <p>As a Council, we are committed to providing a safe, productive and respectful workplace and we believe that having dogs present would present significant challenges to this commitment for staff, visitors and councillors.</p>
---

Therefore, there are only a limited set of circumstances in which dogs are permitted to be in the workplace, however, we will support dog (and other pets) ownership in other ways, recognising that owning pets is a personal choice, but also often usually brings significant benefits to health and wellbeing.

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

In accordance with the Equality Act 2010, Cotswold District Council will make reasonable adjustments to support staff with disabilities. **Assistance dogs** (e.g., guide dogs, hearing dogs) are fully exempt from this policy and are permitted access to all areas of the workplace.

5. What evidence has helped to inform this assessment?

Source	<input checked="" type="checkbox"/>	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	<input type="checkbox"/>	
Comparisons between similar functions / policies elsewhere	<input type="checkbox"/>	
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	<input checked="" type="checkbox"/>	Equality Act 2010

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

This policy has been drafted to adhere to the reasonable adjustments requirement of the Equality Act 2019, in order to support staff with disabilities. No additional research material needs to be explored in order to meet this objective.

7. Has any consultation been carried out?

Yes

Details of Consultation

The recognised trade unions of GMB and Unison have been cited on this policy. Council staff in the CDC Culture Club Group have also been approached for feedback on the contents.

If NO please outline any planned activities

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

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>
LOW – Few members of the general public/staff will be affected by this proposal	<input checked="" type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>

Comments: e.g. Who will this specifically impact?

This policy applies to employees employed by the Council and also nonemployees such as contractors, consultants or any self-employed individuals working for the Council on site. Whilst this policy refers to 'dogs' it includes all animals.

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		x		As a Council, we are committed to providing a safe, productive and respectful workplace and we believe that having dogs present would present significant challenges to this commitment for staff, visitors and councillors.	
Age – Old People		x		See above	
Disability		x		See above	
Sex – Male		x		See above	
Sex – Female		x		See above	
Race including Gypsy and Travellers		x		See above	
Religion or Belief			x	See above	
Sexual Orientation		x		See above	
Gender Reassignment		x		See above	
Pregnancy and maternity		x		See above	
Geographical impacts on one area			x	See above	
Other Groups		x		See above	
<b>Rural considerations:</b> ie Access to services; leisure facilities, transport; education; employment; broadband.		x		See above	

10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale
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Update Policy in line with legislative requirements	Carmel Togher	Brightmine HR & Compliance Centre provides trusted proactive updates, leading practices and tools to help organisations reduce risk and strengthen their HR strategies.	Yearly
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11. Is there is anything else that you wish to add?

No

#### Declaration

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where 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:	Carmel Togher	Date:	30 September 2025
Line Manager:	Angela Claridge	Date:	30 September 2025
Reviewed by Corporate Equality Officer:	Cheryl Sloan	Date:	7 October 2025

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# Agenda Item 10



**COTSWOLD**  
District Council

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET 8 JANUARY 2026</b>
Subject	<b>EQUALITY, DIVERSITY, INCLUSION AND EQUITY POLICY AND PROCEDURE UPDATE 2025</b>
Wards affected	None
Accountable member	Cllr Claire Bloomer, Portfolio Holder for Communities Email: <a href="mailto:claire.bloomer@cotswold.gov.uk">claire.bloomer@cotswold.gov.uk</a>
Accountable officer	Angela Claridge, Director of Governance and Development Email: <a href="mailto:angela.claridge@cotswold.gov.uk">angela.claridge@cotswold.gov.uk</a>
Report author	Carmel Togher, HR Business Partner Email: <a href="mailto:carmel.togher@cotswold.gov.uk">carmel.togher@cotswold.gov.uk</a>
Summary/Purpose	To consider the Council's Equality, Diversity, Inclusion and Equity Policy and Procedure following legislative updates.
Annexes	Annex A – Equality, Diversity, Inclusion and Equity Policy and Procedure. Annex B – Equality and Rurality Impact Assessment Form
Recommendation(s)	<p>That Cabinet resolves to:</p> <ol style="list-style-type: none"> <li>Approve the Equality, Diversity, Inclusion and Equity Policy and Procedure, which has been rewritten to incorporate the Supreme Court Ruling.</li> <li>Approve care experience to be treated as if it were a protected characteristic as many care-experienced people face discrimination, stigma and prejudice.</li> <li>Delegate authority to the Chief Executive Officer to make minor and necessary amendments to the EDIE Policy, enabling timely updates that do not alter the policy's strategic intent.</li> </ol>
Corporate priorities	Delivering Good Services



**COTSWOLD**  
District Council

Key Decision	NO
Exempt	NO



## **1. EXECUTIVE SUMMARY**

**1.1** The Equality, Diversity, Inclusion and Equity Policy has been updated to ensure that it complies with recent legislative changes. HR Policies provide general and practical advice and guidance for managers and staff on a range of employment issues. The policy supports fairness and consistency across the council and helps to protect the council against legal claims.

## **2. BACKGROUND**

**2.1** Regular policy review and revision needs to be carried out on a regular basis and in line with employment law updates in April and October. Delegated authority to make reasonable amendments was given to the Chief Executive Officer of Cotswold District Council.

**2.2** This policy update is of particular interest to the portfolio holder for Communities, which includes diversity and inclusion. Therefore, it has been submitted for approval to the Cabinet.

## **3. MAIN POINTS**

**3.1** The policy has been updated to reflect the UK Supreme Court Ruling of 16<sup>th</sup> April 2025. The ruling clarified language in the Equality Act 2010. The Supreme Court has determined that the definitions of 'man' and 'woman' under the Equality Act 2010 refer exclusively to biological sex. The judgement made it clear that individuals who have had or who are going through gender reassignment are still protected from discrimination. The council expects all staff to treat any employee who is undergoing gender reassignment with respect and an open-minded attitude.

**3.2** The policy incorporates care experienced people as a group who are likely to face discrimination, and the council will treat care experience as if it were a protected characteristic.

**3.3** There are countywide Equality Groups based at Gloucestershire County Council, and in conjunction with their Equalities Officer, Cotswold District Council has an ambition and appetite to join these countywide networks.

**3.4** The council has a Total Mental Health Service that provides a support mechanism for employees, including those with protected characteristics, that can be accessed at a



time to suit them. Employees can access coaching, counselling & therapy, an advanced care team and 24/7 support. This is in addition to our Medicash 24/7 Health and Stress Helpline to get support from a trained counsellor for a range of issues, including work-related issues, health and relationships. The Mental Health Support Directory is available to all and covers national signposting options, general mental health support (such as the LGBT foundation), victim support, housing support, carers support (such as the National Autistic Society), financial wellbeing, bereavement and addiction. The council also has trained Wellbeing Advocates who can support all employees, including those with protected characteristics. They offer a friendly listening ear when employees need to talk and help employees access additional support if needed.

**3.5** HR policies provide legal protection for the council. Clear guidance is provided that reflects employment law and regulations and can help mitigate risk for the council.

#### **4. ALTERNATIVE OPTIONS**

**4.1** Retaining the current policy places the council at risk of challenge if it does not reflect the recent legal developments.

#### **5. CONCLUSIONS**

**5.1** The necessary revisions and updates to the policy have been undertaken to ensure the council is legally compliant.

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

**6.1** The revision and update of the policy outlined within this report is not expected to have a financial impact on Cotswold District Council. The revisions are procedural and legislative in nature, and implementation will be managed within existing staffing and budgetary resources.

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

**7.1** The case of For Women Scotland Ltd v The Scottish Ministers made the headlines during the whole of its travels through the courts and the Supreme Court's decision of 16 April 2025 was a highly anticipated event.

**7.2** On April 16, 2025, the Supreme Court ruled that the definitions of "man," "woman," and "sex" in the Equality Act 2010 were intended



to refer to biological sex rather than gender identity or acquired gender through a Gender Recognition Certificate, requiring a full review of processes.

- 7.3** The Equality and Human Rights Commission (EHRC) released an interim update on 25 April 2025, and provided a reminder that trans people were still protected at any stage of their transition, from proposing to reassign their sex, undergoing a reassignment process, to having completed the surgery; and that a GRC is not required.
- 7.4** The council is therefore required to provide separate spaces for biological women, biological men and trans-people, which impacts staff, as well as members of the public using council facilities.
- 7.5** A draft Code of Practice for Services, Public Functions and Associations (which includes various updates) was submitted to the Minister for Women and Equalities for approval on 04.09.25, which would supersede the 2011 version of the code. The next stage would be for an approved version to be laid before Parliament. No indication of timescale has been provided for this process to take place, but due to the provision of a new draft code, the interim has now been removed from the ECHR website.
- 7.6** Although the Code has not yet been fully implemented, the council is required to update its policies to comply with the new legislation. Policies will also need to be reviewed once the guidance has been adopted, although it is hoped that changes, if any required, would be minimal.

## **8. RISK ASSESSMENT**

- 8.1** By not updating and implementing this policy, the council may fail to comply with the Supreme Court Ruling and leave itself exposed to costly employment law cases.

## **9. EQUALITIES IMPACT**

- 9.1** An Equality Impact assessment has been undertaken, and the policy has been considered to ensure compliance with the Equality Act 2010 and the Public Sector Equality Duty.

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

- 10.1** There are none arising.



**COTSWOLD**  
District Council

## **11. BACKGROUND PAPERS**

None

(END)



## Equality, Diversity, Inclusion and Equity (EDI&E) Policy and Procedure

### Contents

1. Introduction
2. Purpose
3. Scope
4. Expectations
5. Definitions
6. Specific types of discrimination
7. EDI&E training
8. Recruitment
9. Monitoring and review

### 1. Introduction

At Cotswold District Council we are committed to achieving equal opportunities in employment and in the services that we provide. We aspire to have a diverse team at all levels that is representative of the community that we serve.

We want to treat people fairly, value differences, and remove barriers to people fully participating in public life. We all have different backgrounds, strengths, personal characteristics, perspectives, and attributes that, when harnessed and used collaboratively, are incredibly powerful. An inclusive and diverse culture helps each of us to benefit from these difference perspectives, experiences and skills.

Creating an inclusive and diverse culture, with equality for all, is a process of continuous improvement; we should never stop learning!

### 2. Purpose

This policy will:

- provide guidance on how we will provide equity, fairness and respect for all
- set out to remove discrimination and to promote inclusion and diversity
- provide definitions of discrimination with examples of what it may look like
- give assurance that Cotswold District Council will comply with and adhere to the Equality Act 2010 which provides a single framework to tackle disadvantage and discrimination of people with protected characteristics (see section 5).
- Set out the key steps we take to make our culture as inclusive as possible, and how we ensure equality of opportunity throughout the employment lifecycle.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

### 3. Scope

This policy applies to:

- Employees of Cotswold District Council (temporary, part-time, or full-time)
- Contractors / agency
- Volunteers
- Apprentices
- Interns
- Work experience
- Job candidates
- Partners and stakeholders
- Members of the community that we work with

#### 4. Expectations

##### Our commitment to you

We are committed to promoting a working environment based on dignity, trust, and respect, and one that is free from discrimination, harassment, bullying or victimisation.

##### What we expect from you

We expect people to take personal responsibility for observing, upholding and promoting this policy. Our culture is made in the day-to-day working interactions between us, so creating the right environment is a responsibility that we all share.

We expect you to treat your colleagues and third parties (including customers, suppliers, agency staff, consultants, councillors and members of the public) fairly and with dignity and respect. Sometimes this may mean allowing for different views and making space for others to contribute.

We are liable for discrimination and harassment as an organisation, and you should be aware that you can also be personally liable for discrimination and harassment.

##### What we expect from others

We expect third parties (including customers, suppliers, agency staff, consultants, councillors and members of the public) to treat you fairly and with dignity and respect. We will provide people with either a copy of this policy or with statements explaining our expectations around EDI&E (or, we will check that the relevant agency has policies in place that have the same requirements as ours and that staff have been made aware of the policy). We will take action if a third party is alleged to have breached our expectations.

#### 5. Definitions

##### Understanding Equality, Diversity, Inclusion & Equity

**Equality** is not about 'treating everyone the same' but recognising that everyone is different, and that people's needs are met in different ways. Equality is essentially about fairness and ensuring that we all have the best possible chance to succeed in life whatever our background or identity.

This is closely related to **Equity** which is about ensuring that we provide resources to enable all people to be equal based on their needs. Equity tries to address the different opportunities for people to be equal.

**Diversity** is about understanding that everyone is unique. Recognising, respecting and celebrating the added value that differences bring.

**Inclusion** is where difference is seen as a benefit and where perspectives and differences are shared, leading to better decisions.

An **inclusive** working environment is one in which everyone feels valued, that their contribution matters, and they can perform to their full potential, regardless of background, identity, or circumstances. An inclusive workplace enables a diverse range of people to work together effectively.

### Understanding Protected Characteristics

The Equality Act 2010 prohibits discrimination due to any one of the following 9 protected characteristics:

- Age
- Disability
- Gender reassignment
- Marital or civil partnership status
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

Where possible, Cotswold District Council will tackle disadvantage and discrimination of all people, even if their characteristic is not a 'protected one' under the Equality Act. We will consult with best practice and continually review how we can improve our equality and inclusion, treating this as one for constant tending and discussion.

Many care experienced people face discrimination, stigma, and prejudice in their day to day lives. Such discrimination can be similar in nature to the other groups that have a legally protected characteristic under the Equality Act (2010). Cotswold District Council recognises that care experienced people are a group who are likely to face discrimination and will therefore treat care experience as if it were a protected characteristic. Future decisions, services and policies will be assessed through Equality Impact Assessments to determine the impact of changes on people with care experience, alongside those who formally share a protected characteristic.

Harassment and victimisation are also prohibited under the Act.

### Understanding Key Terms

**Direct discrimination:** treating someone with a protected characteristic less favourably than others (for example choosing not to recruit someone because they are disabled, and you think they wouldn't fit in to the team).

**Indirect discrimination:** putting rules or arrangements in place that apply to everyone, but that puts someone with a protected characteristic at an unfair disadvantage. An example is introducing a requirement for all staff to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities, could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery or prevent them from doing the job because they have to collect their children from school or nursery.

**Unconscious bias:** a person's general assumptions about the abilities, interests and characteristics of a particular group of people that influences how they treat those people. Such assumptions or prejudices may cause them to apply requirements or conditions that put those particular groups at a disadvantage. Examples include:

- steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals.

- recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients, and
- using different standards for different groups of employees to judge performance.

**Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.

**Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.

**Positive action:** taking specific steps to improve equity in your workplace.

**Harassment:** unwanted behaviour linked to a protected characteristic that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

**Sexual harassment:** unwanted conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment for them, or

Unwanted conduct of a sexual nature that is related to gender reassignment or sex which has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment for them, and when rejected or submitted to results in less favourable treatment.

**Victimisation:** treating someone unfairly because they have complained about discrimination or harassment.

**Bullying:** There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating, or injuring the recipient.

See the **Anti-Harassment and Bullying Policy and Procedure** for more information. This can be found in the Cotswold District Council portal.

### Sex and Gender reassignment

The protected characteristic of sex in the Equality Act means biological sex. This is distinct from the protected characteristic of gender reassignment. This means that while transgender individuals are protected from discrimination, their rights are grounded in the characteristic of gender reassignment rather than sex.

In an equal pay claim the comparator must be of the opposite biological sex.

## 6. Specific types of discrimination

### Disability

#### Talking about disability

We understand that some people find it hard to discuss their disabilities and that disability can be invisible. Psychological safety (where people feel able to speak up about their experiences without fear of negative consequences) is paramount to ensuring disability inclusion. We do not tolerate language that is negative, inappropriate or offensive towards people with a disability, this includes language that may take the form of jokes or 'banter'. If you adopt such language, action will be taken against you, including (where applicable) action under our Disciplinary Policy.

## Discrimination arising from disability

Here are some ways that discrimination can occur:

**Treating someone unfavourably** because of something connected with that person's disability and where such treatment is not justified. Examples include:

- dismissing someone or failing to pay a bonus to someone because of their disability-related absence or
- disciplining someone for losing their temper where such a loss of temper was out of character and was due to severe pain caused by having cancer.

**Failing to make reasonable adjustments for disabled employees.** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:

- allocating some of the disabled person's duties to a colleague
- changing their working

## Recruiting people with a disability

The recruitment team and our Human Resources (HR) Team will consider disability in advance of a recruitment campaign so that advertising, application forms and assessments, arrangements for interviews, job descriptions and employee specifications, and selection criteria are appropriate and as inclusive as possible.

We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process. These may include ensuring easy access to the premises for an interview/adapting psychometric tests/replacing psychometric tests with an alternative option/providing an alternative to a telephone interview for a deaf candidate/providing a suitable chair for an interview with a candidate suffering from back problems.

Cotswold District Council is a Disability Confident employer which means that candidates with a disability who successfully evidence the essential criteria on the person specification will be offered a job interview.

If you participate in the interview process, you must not ask job applicants about their health or disability. This is only appropriate in exceptional circumstances and where there are specific legal grounds for doing so. If you have any concerns, please seek advice from your HR Business Partner.

## Reasonable adjustments

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties at work because of your disability, please contact your line manager to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you and a medical adviser to help us get the right support in place. If this is the case, you will have a documented framework of the agreed reasonable adjustments, which will be reviewed on a regular basis, but will remain in situ for the duration of employment.

## Disability-related absence (long-term)

For colleagues who are returning from long-term disability-related absence, we have a return-to-work support programme in place.

#### Support with a disability

If you have a disability, or you care for someone with a disability, and need emotional support or help with practical issues, please contact your line manager in the first instance. You can also seek support and advice by contacting HR or your Trade Union representative.

#### Menopause

Whilst the menopause is not necessarily recognized as a disability, we aim to be supportive and inclusive of employees undergoing the menopause and will make adjustments and accommodations where possible.

Please see the [Menopause Policy](#) for further information and details.

#### Gender reassignment

No one will be discriminated against on the grounds of gender reassignment.

The Equality Act 2010 defines this as proposing to undergo, undergoing or having undergone a process (or part of a process) for the purpose of reassigning their sex by changing physiological or other attributes of sex.

We expect all staff to treat any employee who is undergoing gender reassignment with respect and an open-minded attitude. Be ready to listen and understand their needs and concerns. All employees deserve to be treated with respect and sensitivity about their personal lives. Similarly, a person undergoing gender reassignment should accept that people may make mistaken assumptions and extend grace and patience to others in helping them to understand.

#### Religion or belief

No one will be discriminated against on the basis of their religion or belief.

The 2010 Equality Act gives these definitions:

- (a) “religion” means any religion,
- (b) “belief” means any religious or philosophical belief,
- (c) a reference to religion includes a reference to lack of religion, and
- (d) a reference to belief includes a reference to lack of belief

The right to dignity and respect in the workplace means that we expect all staff to treat each other with respect even if they have different views.

#### Pregnancy and maternity

Pregnant employees and/or employees who have taken birth-related leave have the right not to be treated unfairly or dismissed because of a reason related to their pregnancy/maternity.

If an employee is at risk of redundancy during maternity or for 18 months from the expected week of childbirth or birth, they have the right to be offered a suitable alternative vacancy.

Pregnant women will not be discriminated against when applying for Cotswold District Council vacancies (internally or externally) or for training or development opportunities.

For more details on rights during maternity see the [Maternity Policy](#).

## Neurodiversity

Where neurodivergent conditions fall within the definition of disability under the Equality Act 2010, persons having such conditions will have the protected characteristic of disability under the Act.

We will support people with neurodiversity at all stages of the employment lifecycle and are open to working with people with neurodiversity by listening to their needs and supporting with reasonable adjustments. Examples of things that we can do include:

- giving job candidates more time to answer questions in interviews
- ensuring quiet workspaces with low level lighting
- coaching staff to plan and manage their time
- offering more frequent, shorter breaks
- reviewing tasks in different formats – e.g., mind mapping
- providing more regular check-ins

## 7. EDI&E Training

All staff must complete the mandatory training provided for the whole workforce via iHASCO, our online training portal. If you are involved with making decisions about a person's employment, you must attend appropriate equality, diversity, and inclusion (EDI&E) training. All managers are required to attend EDI&E training.

All new starters must complete EDI&E training as part of their onboarding programme.

Every current employee must complete regular EDI&E training on at least an annual basis.

## 8. EDI&E in Recruitment

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible.

We will ensure anyone making a decision about recruitment does not discriminate in any way and has attended appropriate training.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias, or prejudice do not play any part in recruitment decisions. For example, question and check the basis of your decisions and ensure that you are making a decision on an objective criterion for the role. Where possible, selection panels should aim to be diverse.

Please refer to the [Recruitment Policy](#) for more information.

## 9. Monitoring and review

We will aim to analyse diversity and inclusion data (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our equality, diversity, inclusion and equity strategy. We would look to address any issues identified by this data.

You are also responsible for ensuring the data we hold for you is correct, please take the time to regularly check your business world data and update us when your personal information changes. If you have any questions, queries, or concerns.

We are continually looking at ways to promote EDI&E in the workplace, not only through training but also through the online portal; we welcome suggestions from our employees at any time.

<b>Version Control:</b>	
<b>Document Name:</b>	Equality, Diversity, Inclusion and Equity (EDI&E) Policy and Procedure
<b>Version:</b>	1.0
<b>Responsible Officer:</b>	HR Business Partner
<b>Approved by:</b>	Cabinet
<b>Date First Approved:</b>	September 2023
<b>Next Review Date</b>	
<b>Retention Period:</b>	

## Equality and Rurality Impact Assessment Form

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

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

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

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

**1. Persons responsible for this assessment:**

Names: Carmel Togher	
Date of assessment: 1 <sup>st</sup> August 2025	Telephone: 01285 623482 Email: <a href="mailto:carmel.togher@cotswold.gov.uk">carmel.togher@cotswold.gov.uk</a>

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

Equality, Diversity, Inclusion and Equity Policy and Procedure
Is this a new or existing one? New (updated)

**3. Briefly describe its aims and objectives**

The policy will provide guidance on how we will provide equity, fairness and respect for all. It will set out to remove discrimination and to promote inclusion and diversity. The policy provides definitions of discrimination and examples. It gives assurance that CDC will comply with and adhere to the Equality Act 2010. The policy sets out the key steps to take to make our culture as inclusive as possible and how we ensure equality of opportunity throughout the employment lifecycle.
--

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

This policy links to relevant legislation and guidance, namely, Equality Act 2010, the Public Sector Equality Duty 2011 and incorporates the recent UK Supreme Court Judgement on 16<sup>th</sup> April 2025.

5. What evidence has helped to inform this assessment?

Source	<input checked="" type="checkbox"/>	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	<input type="checkbox"/>	
Comparisons between similar functions / policies elsewhere	<input type="checkbox"/>	
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	<input checked="" type="checkbox"/>	Supreme Court Ruling

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

The policy has only been updated following a recent legal ruling. No additional research material needs to be explored in order to meet this objective.

7. Has any consultation been carried out?

Yes.

## Details of Consultation

The recognised trade unions of GMB and Unison have previously been cited on this policy. It has been updated in light of the recent Supreme Court Ruling. Discussion has also taken place with Cllr Bloomer and Legal Services.

If NO please outline any planned activities

--

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

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>
LOW – Few members of the general public/staff will be affected by this proposal	<input type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input checked="" type="checkbox"/>

Comments: e.g. Who will this specifically impact?

The policy applies to employees, contractors/agency, apprentices, interns, work experience, job candidates, partners and stakeholders and members of the community CDC work with.

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		x		Creating an inclusive and diverse culture with equality for all. We want to treat people fairly, value differences and remove barriers to people fully participating in public life.	
Age – Old People		x		See above	
Disability		x		See above	
Sex – Male		x		See above	
Sex – Female		x		See above	
Race including Gypsy and Travellers		x		See above	
Religion or Belief		x		See above	
Sexual Orientation		x		See above	
Gender Reassignment		x		See above	
Pregnancy and maternity		x		See above	
Geographical impacts on one area			x	See above	
Other Groups		x		See above	
<b>Rural considerations:</b> ie Access to services; leisure facilities, transport; education; employment; broadband.		x		See above	

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

Action(s)	Lead Officer	Resource	Timescale
Update Policy in line with legislative requirements	Carmel Togher	Brightmine HR & Compliance Centre provides trusted proactive updates, leading practices and tools to help organisations reduce risk and strengthen their HR strategies.	Yearly


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

#### Declaration

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where 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:	Carmel Togher	Date:	August 2025
Line Manager:	Angela Claridge	Date:	August 2025
Reviewed by Corporate Equality Officer:	Cheryl Sloan	Date:	31 August 2025

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# Agenda Item 11



**COTSWOLD**  
District Council

Cotswold District Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET – 8 JANUARY 2026</b>
Subject	<b>CORPORATE ENFORCEMENT POLICY</b>
Wards affected	All
Accountable member	Councillor Mike Evemy, Leader of the Council Email: <a href="mailto:Mike.Evemy@cotswold.gov.uk">Mike.Evemy@cotswold.gov.uk</a>
Accountable officer	Jane Portman, Chief Executive Email: <a href="mailto:Democratic@Cotswold.gov.uk">Democratic@Cotswold.gov.uk</a>
Report author	Emma Cathcart, Head of Service Counter Fraud and Enforcement Unit Email: <a href="mailto:Democratic@Cotswold.gov.uk">Democratic@Cotswold.gov.uk</a>
Summary/Purpose	<p>To present Cabinet with a revised Corporate Enforcement Policy for approval and adoption.</p> <p>Cotswold District Council is required to have an effective Corporate Enforcement Policy to enable officers to investigate and take action to ensure individuals and businesses comply with the law.</p> <p>The policy sets out the legislative framework and principles the council will abide by when undertaking investigations to mitigate the risk of legal challenge in Court.</p> <p>The policy demonstrates the council's consideration of necessity, proportionality and public interest when deciding on enforcement action and demonstrates openness and transparency for residents, Councillors and employees.</p>
Annexes	Annex A – Corporate Enforcement Policy Annex B – Equality and Rurality Impact Assessment Form



Recommendation(s)	<p>That Cabinet resolves to:</p> <ol style="list-style-type: none"><li>1. Approve and adopt the Corporate Enforcement Policy attached to this report.</li><li>2. Delegate authority to the Chief Executive to approve future minor amendments to the Policy, in consultation with the Leader of the Council, Head of Service Counter Fraud and Enforcement Unit, Relevant Heads of Service and the Head of Legal Services.</li></ol>
Corporate priorities	<ul style="list-style-type: none"><li>• Delivering Good Services</li></ul>
Key Decision	NO
Exempt	NO
Consultees/ Consultation	The draft Policy was subject to consultation with Enforcement Officers, Corporate Leadership Team and Legal Services.



## **1. EXECUTIVE SUMMARY**

- 1.1** The Counter Fraud and Enforcement Unit is tasked with reviewing Cotswold District Council's Corporate Enforcement Policy.
- 1.2** Regulatory authorities produce Enforcement Policies to inform the public and businesses about the principles which underpin their approach to enforcement.
- 1.3** The council is responsible for investigating and enforcing a wide range of breaches and offences. This policy is required to ensure consistency in the approach the council takes when considering the enforcement options available, as it provides an overarching framework.
- 1.4** A consistent and fair standard will help to ensure the council is less likely to be challenged during legal proceedings and aids officers when taking enforcement decisions.
- 1.5** Some service areas may produce separate Enforcement Plans and Policies setting out more detailed relevant service-specific procedures.

## **2. BACKGROUND**

- 2.1** The Corporate Enforcement Policy attached at Annex A sets out the enforcement principles that Cotswold District Council will apply to its enforcement activities and the guiding principles by which the council will seek to protect public health, safety, amenity and environment within its locality.
- 2.2** The Policy is an overarching one which details the various areas of enforcement the council is responsible for. It has been reviewed by lead officers who have enforcement responsibilities to ensure it correctly reflects key legislation.
- 2.3** For ease of reference, new text is shown in red and text to be removed is shown as struck through.
- 2.4** The majority of the amendments in sections 1 to 15 reflect minor amendments with more significant additions and updates being made to section 16 of the Policy 'The scope of each service'.
- 2.5** This section now reflects a new section being drafted to better cover the Licensing Service and the council's activities in relation to anti-social behaviour.
- 2.6** Cabinet last considered the policy in March 2019.



**2.7** Awareness will be raised with all staff following the approval of the policy through internal communication channels and through all staff briefings and management meetings.

### **3. ALTERNATIVE OPTIONS**

**1.1.** None

### **4. FINANCIAL IMPLICATIONS**

**4.1** There are no direct financial implications arising from this report.

**4.2** The adoption and approval of this policy will support the council's objectives in reducing crime and financial loss to the council.

**4.3** The policy provides officers with a framework that can be followed when dealing with enforcement. This allows for financial penalties to be charged however, the intention of the policy is not primarily for revenue raising purposes but to ensure the correct application of sanctions and penalties.

### **5. LEGAL IMPLICATIONS**

**5.1** There are no significant legal implications associated with this report.

**5.2** Cotswold District Council has a statutory obligation for enforcing a wide range of legislation, where it is necessary and proportionate to do so, and this is identified within the policy.

**5.3** In general terms, the existence and application of an effective enforcement regime assists the council in effective deterrent and detection activities which is less susceptible to legal challenge.

**5.4** The legislation utilised by the council is identified within the policy and the council must comply with all legislative requirements.

### **6. RISK ASSESSMENT**

**6.1** Cotswold District Council is required to have an effective Corporate Enforcement Policy to enable officers to investigate and take action to ensure individuals and businesses comply with the law.

**6.2** The policy sets out the legislative framework and principles the council will abide by in investigations undertaken and to mitigate the risk of legal challenge in Court.



## **7. EQUALITIES IMPACT**

- 7.1** Prosecutions will only be considered where the evidential and public interest tests are met with due consideration to the welfare of individuals. Where any safeguarding concerns are identified during the course of any investigation, appropriate referrals will be made.
- 7.2** The council will only take enforcement action where appropriate to do so with due consideration to older offenders, offenders with disabilities and where the offender lacks mental capacity.
- 7.3** The council seeks to ensure that public authorities' actions are consistent with the Human Rights Act 1998 (HRA). It balances safeguarding the rights of the individual against the needs of society as a whole to be protected from crime and other public safety risks.

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

- 1.2.** None directly.

## **9. BACKGROUND PAPERS**

- 1.3.** None.

(END)

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# Corporate Enforcement Policy



**COTSWOLD**  
District Council

## Version Control:

**Document Name:** Corporate Enforcement Policy

**Version:** 2

**Responsible Officer:** Chief Executive  
Head of Service Counter Fraud and Enforcement Unit

**Approved by:** Cabinet

**Next Review Date** November 2028

## Revision History

Revision date	Version	Description
March 2019	1	Redraft of Enforcement Policy; Cabinet December 2012
<u>October 2025</u>	<u>2</u>	<u>Full review with inclusion of Anti-Social Behaviour section, Licensing section and general revisions</u>

## Consultees

Internal	External
Enforcement Service Leads Legal Services Corporate Management / Senior Leadership Team Cabinet Member	

## Distribution

Name	
Enforcement Officers	

# Corporate Enforcement Policy

## Contents – To be updated at final stage

1.	INTRODUCTION .....	4
2.	PURPOSE OF THE POLICY .....	4
3.	PRINCIPLES AND PROCEDURES FOR GOOD ENFORCEMENT.....	5
4.	THE REGULATORS' COMPLIANCE CODE.....	5
5.	CONFLICTS OF INTEREST AND UNDUE INFLUENCE .....	6
6.	FAIRNESS AND EQUALITY.....	6
7.	REFERRALS .....	6
8.	ENFORCEMENT OPTIONS .....	8
9.	ENFORCEMENT ACTION.....	7
10.	PROSECUTION .....	9
11.	SIMPLE CAUTIONS .....	10
12.	POWERS OF OFFICERS.....	11
13.	CIVIL CLAIMS .....	11
14.	COMPLAINTS PROCEDURE.....	11
15.	IMPLEMENTATION AND REVIEW.....	12
16.	ENFORCEMENT TOOLS AND REMEDIES .....	<b>Error! Bookmark not defined.</b>
17.	THE SCOPE OF EACH SERVICE .....	12
17.1	Planning - Development Control Management .....	12
17.2	Building Control .....	14
17.3	Housing .....	15
17.4	Environmental and Regulatory Services (ERS) Environmental Protection and Food Health and Safety .....	15
17.5	Land and Property .....	17
17.6	Revenues and Benefits.....	17
17.7	Counter Fraud Unit Counter Fraud and Enforcement Unit.....	18
17.8	Parking Services .....	18
17.9	Liaison with other Agencies .....	19
17.10	Publicity .....	19
	ANNEX 1 ENVIRONMENTAL PROTECTION AND FOOD HEALTH AND SAFETY (Environmental Health) AND REGULATORY SERVICES .....	20
1	CURRENT POLICIES RELEVANT TO ENFORCEMENT CONSIDERATIONS .....	20
2	RESPONSIBILITIES FOR ENVIRONMENTAL HEALTH ERS DECISIONS.....	20
3	DECISION MAKING .....	21

# Corporate Enforcement Policy

# Corporate Enforcement Policy

## 1. INTRODUCTION

1.1 The council is responsible for enforcing a wide range of legislation. This document sets out the council's Enforcement Policy. It is clear that, due to the range of enforcement issues dealt with by the council, there is no one approach, which fits all and therefore where dealing with particular issues, the policy has been separated into service areas. The additional details can be found annexed to this policy.

1.2 This council takes breaches of legislation seriously and always carries out investigations where necessary. Enforcement includes any action taken by Officers aimed at ensuring that individuals or businesses comply with the law. The enforcement options will differ where different pieces of legislation are used, but the principles of application should remain constant.

1.3 Any reference within this policy to staff, employees or Officers includes individuals employed to carry out duties on behalf of the council. These Officers may be contractors, employees of Publica or have joint employment arrangements with the council.

1.4 Enforcement includes visits, verbal and written advice on legal requirements and good practice, assistance with licensing compliance, written warnings, the service of statutory and fixed penalty notices, **criminal and civil** including financial penalties, prohibitions, **simple formal** cautions, attachment to earnings (including some benefits and allowances), prosecution, seizure and detention, works in default, injunctions and liaison and cooperation with other enforcement authorities where appropriate.

## 2. PURPOSE OF THE POLICY

2.1 The purpose of this policy is to set out the guiding principles by which legislation will be enforced by the council to protect public health, safety, amenity and the environment within the council's jurisdiction.

2.2 It provides an enforcement framework in accordance with:

- The Central and Local Government Concordat on Good Enforcement.
- The Legislative and Regulatory Reform Act 2006.
- The Regulators Compliance Code.
- The Crime and Disorder Act 1998.
- The Regulatory Enforcement and Sanctions Act 2008.

2.3 **Additionally, enforcement** plays an important role in enabling the council to achieve its priorities and community outcomes. ~~which are:~~

- ~~To create strong communities and reduce crime and disorder;~~
- ~~To enhance the environment;~~
- ~~To promote a thriving economy and seek to maintain a fair trading environment;~~
- ~~To protect the social housing stock;~~
- ~~To deliver value for money;~~
- ~~To carry out enforcement in a fair, practical and consistent manner.~~

# Corporate Enforcement Policy

## 3 PRINCIPLES AND PROCEDURES FOR GOOD ENFORCEMENT

3.1 The council has adopted the Central and Local Government Concordat on Good Enforcement. The Legislative and Regulatory Reform Act 2006 also places a duty on the council to have regard to the 'Principles of Good Regulation' when exercising specified regulatory functions.

3.2 The 'Principles of Good Regulation', together with the principles set out in the Concordat, are intended to ensure:

- **Standards:** Provide and publish clear standards setting out the level of service and performance provided by the council.
- **Openness:** Provision of information and advice in plain language about how we carry out our work, including consultation with stakeholders.
- **Helpfulness:** Provision of advice and assistance on compliance in a courteous efficient and prompt manner.
- **Proportionality:** When making a decision on appropriate enforcement action, Officers will, where discretion is allowed, consider both the circumstances of the case and history of the parties involved and will ensure that the remedial action required is proportionate to the risks and/or disadvantage created by the non-compliance, that it reflects any advice issued by Central Government or other co-ordinating bodies and takes into consideration relevant advice, policy and the aims of the council.
- **Consistency:** Duties to be carried out in a fair, equitable and consistent manner and with arrangements in place to promote consistency.
- **Transparency:** Access to information regarding regulatory procedures and decisions to be freely available.
- **Accountability:** The council will be accountable for the efficiency and effectiveness of its regulatory activities.
- **Targeting:** The council accepts that its enforcement resources are limited and, where appropriate, they should be focused on those persons or companies whose activities give rise to the risks which are most serious or least well controlled on their own premises or public open space. Enforcement is informed through intelligence arising from an investigation or complaints, planned projects, special surveys, enforcement initiatives or as a requirement from a Government Department.
- **Confidentiality:** The council will ensure information provided in confidence is treated accordingly.

## 4 THE REGULATORS' COMPLIANCE CODE

4.1 The council will have regard to the Regulators' Compliance Code with a view to achieving regulatory outcomes without imposing unnecessary burdens on businesses, organisations and other regulated entities by:

- **Supporting economic progress:** To allow and encourage economic progress and choose proportionate approaches to those they regulate based on relevant factors including, for example, business size and capacity.
- **Risk assessment:** To determine the priority risk in the area of responsibility and then allocate resources where they would be most effective in addressing those priority risks.
- **Advice and guidance:** To provide authoritative and accessible advice to businesses.

# Corporate Enforcement Policy

- **Simple and straightforward ways to engage:** To explain clearly what the non-compliant item or activity is, the advice being given, actions required or decisions taken and the reasons for these.
- **Transparency:** By publishing a clear set of service standards and setting out what those they regulate should expect from them.

## 5 CONFLICTS OF INTEREST AND UNDUE INFLUENCE

5.1 The enforcement role of the council is an impartial one. However, as with any organisation, there is the possibility of a real or perceived conflict of interest or undue influence arising. It is therefore important to the integrity of the enforcement services of the council that people seeking to use it are not the subject of discrimination, nor are they granted advantageous treatment because of their status.

5.2 Conflict of interest could include where a customer is socially acquainted with or related to the Enforcement Officer. Under these circumstances it may be difficult for the officer to act in an impartial manner.

5.3 Undue influence arises where a party exercises a dominant influence over the mind of another so that person is unable to exercise a free and independent will in the matter. For example, when an employee knows that a client is a Councillor or a more senior member of staff.

5.4 Where an employee believes that there is potential for conflict of interest or undue influence then the matter should be referred to their Line Manager for appropriate action and advice **in accordance with the code of conduct**.

## 6 FAIRNESS AND EQUALITY

6.1 All enforcement action and investigations will be carried out in a manner which complies with the requirements of legislation and codes of practice governing the collection of evidence and investigatory powers.

6.2 Officers will take care not to take any action which contravenes human rights and anti-discrimination legislation unless it is necessary and proportionate to do so.

## 7 REFERRALS

7.1 The council regularly consults (and works) with other agencies including:

- Fire and Rescue Services;
- **Utility Companies** Severn Welsh Water/Trent Water/Thames Water;
- The Police;
- The Environment Agency;
- The Department for Environment, Food and Rural Affairs;
- The Drinking Water Inspectorate;
- The Department for Work and Pensions;
- Health and Safety Executive;
- **Gloucestershire** The County Council;
- Other councils;

# Corporate Enforcement Policy

- Other agencies or organisations as appropriate;

7.2 Information of allegations outside the remit of this council may be referred to the appropriate enforcement authority to enable that agency to investigate the allegation.

7.3 The council may also provide data to or obtain data from other enforcing authorities. When data sharing between authorities/agencies occurs this will be done in accordance with all data protection legislation and regulations.

7.4 The information supplied by an individual may be used to commence or support an investigation. However, the council will ensure that the identity of persons contacting the council is not revealed to a third party except:

- Where the law requires.
- Where the case proceeds to Court or Tribunal.
- With the prior written agreement of the person supplying the information.

## 8 ENFORCEMENT ACTION, TOOLS AND REMEDIES

8.1 All enforcement action, whether formal or informal, will be carried out in accordance with the principles set out in this policy.

8.2 In deciding to take formal action and, if so, what type of action to take, Officers will consider the following:

- Any individual Enforcement Policy relevant to their practice area;
- The seriousness of the breach or contravention;
- The consequences of non-compliance in terms of risk to people, property, the community or the environment;
- The individual's or company's past history in terms of compliance;
- Confidence in management, level of awareness of statutory responsibilities and willingness to prevent a recurrence;
- The likely effectiveness of the various alternative enforcement options;
- The public interest, protecting public health, public expectation and the importance of the case in setting a precedent;
- The application of any national or local guidance to the matter in question;
- The aims and priorities of the council;
- Information received following liaison with other external enforcing agencies;
- Relevant case law and guidance;
- The likelihood of the contravener being able to establish a defence;
- The information received following liaison with other authorities;
- The reliability of witnesses.

8.3 The most efficient and effective action will be taken to achieve the desired compliance with the law. The decision will be taken in an objective and fair way in accordance with the principles set out in this policy.

8.4 **In the vast majority of cases the council will try to resolve matters without resorting to enforcement action. Where possible and appropriate, the council will work informally through negotiation and discussion to remedy the situation. ~~In the vast majority of cases~~**

# Corporate Enforcement Policy

~~the Council will try to resolve matters informally through negotiation and discussion. . In some cases informal resolution cannot be achieved, or the matter being enforced is so serious that the informal stage would be inadequate. In these cases the council has a wide range of alternative powers available. Certain breaches of legislation will require urgent and immediate attention, either because the time period for action is limited or because the effect of the activity causes significant harm to the public interest.~~

8.5 The council has the power to issue a Requisition for Information under **various pieces of legislation, such as** section 16 of the Local Government (Miscellaneous Provisions) Act 1976, section 330 of the Town and Country Planning Act 1990, Section 235 of Housing Act 2004, and section 85 of the Private Water Supply Regulations 2016. This notice requires the recipient to provide information in respect of land/property in which they are suspected to have an interest. Not returning the form duly completed is an offence which can be prosecuted in the Magistrates' Court and lead to a fine of up to £5,000. For **suspected** breaches of planning control the council also has the power to issue a Planning Contravention Notice **under section 171C of the Town and Country Planning Act 1990**, which carries a similar penalty for failing to comply.

8.6 The council can use civil remedies to recover any property or debts and any costs incurred, but the council also has the power to prosecute a wide range of offences under section 222 of the Local Government Act 1972. Where there is enforcement action in a criminal court the council can use Proceeds of Crime Act 2002 legislation to recover money.

8.7 There are three areas under the Regulation of Investigatory Powers Act 2000 (RIPA) and the Investigatory Powers Act 2016 that have to be considered by a Local Authority when conducting investigations. These are:

- Directed Surveillance.
- Covert Human Intelligence Sources (CHIS).
- Acquisition of Communications Data.

8.8 The council has separate Policies and Procedural Guides relating to the use of RIPA and any officer considering the use of it should follow these.

8.9 Where the council uses CCTV it does so in line with the appropriate regulatory guidance and legislation. The council has a separate policy which Officers must adhere to.

## 9 ENFORCEMENT OPTIONS

9.1 The options available (but not limited to) are:

- Informal action and advice – written or oral,
- A range of Statutory Notices generally requiring some remedy within a specified timescale (or possibly immediately),
- Fixed Penalty and Civil Penalty Notices,
- Letter of warning,
- Simple Caution,
- Financial Penalty,
- Prosecution,
- Prohibition,
- Injunctive Restraint,

# Corporate Enforcement Policy

- Seizure of goods, equipment, articles or records (paper or computer),
- Execution of work in default i.e. works required by a Statutory Notice where the recipient has not complied,
- A range of Statutory Orders,
- Compulsory purchase and enforced sale of properties or land,
- Attachment to earnings,
- County Court Enforcement,
- Bankruptcy and Winding-Up Petitions.
- Proceeds of Crime Applications

## 10 PROSECUTION

10.1 The council will use discretion in deciding whether to initiate a prosecution. Other approaches to enforcement can sometimes promote compliance with legislation more effectively. However, where the circumstances warrant it, prosecution without prior warning and recourse to alternative sanctions may be appropriate.

10.2 Each case will be treated as unique and considered on its own facts and merits with due consideration to the Equality Act 2010 and the Human Rights Act 1998. All the circumstances surrounding the case will be considered including the social benefits and costs associated with bringing the matter to the attention of the Courts.

10.3 The prosecution of offenders will be used judiciously but, without hesitation, against those businesses or individuals where the law is broken and the health, safety, well-being or amenity of the public, employees and consumers are subject to serious risk.

10.4 Legal advice will be taken to ensure that only those cases presenting a realistic prospect of conviction will be pursued. The council will have due regard to the availability of any defences and to any explanation, apology or other issue referred to by the suspect by way of mitigation.

10.5 The decision to prosecute **must be taken by officers with the correct delegated authority, independently of councillors, subject to financial implications which may require a formal council decision.** The decision will take into account the criteria set down in the Code for Crown Prosecutors, issued by the Crown Prosecution Service. Both stages of the 'Full Code Test' as set out in the Code for Crown prosecutors will be applied as set out below:

### 10.5.1 The Evidential Test

10.5.1.1 There must be sufficient evidence to provide a realistic prospect of conviction and the evidence must be admissible and reliable.

10.5.1.2 In determining the sufficiency of evidence, consideration should be given to the following factors:

- i) Availability of essential evidence;
- ii) Credibility of witnesses – are they likely to be seen as credible witnesses and whether they are likely to be consistent and fail under cross-examination? – are they willing to attend as witnesses? – could they be 'hostile' witnesses?
- iii) Where the case depends in part on admissions or confessions, regard should be had to their admissibility;

# Corporate Enforcement Policy

- iv) Where two or more defendants are summonsed together, the sufficiency and admissibility of evidence available against each defendant, in the event that separate trials are ordered.

10.5.1.3 In determining the admissibility of evidence, regard should be given to the requirements of the Police and Criminal Evidence Act 1984 and the Criminal Procedure and Investigations Act 1996 and associated Codes of Practice.

10.5.2 **The Public Interest Test**

10.5.2.1 When satisfied that sufficient evidence is available, consideration must be given to whether the public interest requires a prosecution.

10.5.2.2 The following considerations should apply:

- i) Seriousness of the offence – the degree of detriment or potential detriment to consumers, employees or the environment. Current public attitudes to the particular breach of law should be considered.
- ii) The age of the offence – less regard will be paid to this if the length of time could be attributable to the defendant themselves, the complexity of the case or the particular characteristics of the offence that have contributed to the delay in its coming to light.
- iii) The age, circumstances or mental state of the offender – less regard to this is given if there is a real possibility of repetition or the offence is of a serious nature. Whether the defendant is likely to be fit enough to attend Court should also be considered.
- iv) The willingness of the offender to prevent a recurrence of the problem. If the circumstances that give rise to the offence have subsequently been rectified and there is little likelihood of a recurrence then the case may be dealt with more appropriately by other means.
- v) The ‘newness’ of the legislation transgressed may be a consideration, especially where the offence is of a technical nature, and future compliance may be obtained by less formal means.
- vi) Important but uncertain legal points that may have to be tested by way of prosecution.

## 11 SIMPLE CAUTIONS

11.1 A **Local Authority** Simple Caution may be used as an alternative to prosecution. The aim of a Simple Caution is to deal quickly and simply with offences, save Court time and reduce the likelihood of re-offending.

11.2 A decision to offer a Simple Caution must be made having regard to:

- Home Office circular
- **16/2008 Simple Cautioning of Adult Offenders** **30/2005 Cautioning of Offenders**.
- Guidance to Police Officers and Crown Prosecutors issued by the Director of Public Prosecutions.
- LACORS Guidance on Cautioning of Offenders.

11.3 Following the offer of a Simple Caution, the individual or company concerned will be required to confirm acceptance within 14 days.

11.4 When considering whether to offer a Simple Caution, the following will be taken into account:

- Whether a Simple Caution is appropriate to the offence and the offender;

# Corporate Enforcement Policy

- Whether a Simple Caution is likely to be effective;
- Public interest considerations;
- The views of the victim and the nature of any harm or loss;
- Whether the offender has made any form of reparation or paid any compensation;
- Any known records of previous convictions or Simple Cautions relating to the offender.

11.5 A Simple Caution **will usually only be considered for low level offending and** cannot be given where the offence is indictable only or where the offender is under 18 years of age. It may only be offered where the offence has been fully admitted by the offender.

11.6 The person administering the Caution will be an appropriate senior officer employed within the council.

11.7 If the offender fails to admit the offence or does not agree to the Simple Caution, the case will be considered for prosecution.

## 12 POWERS OF OFFICERS

12.1 Officers have a range of delegated powers set out within legislation to assist them in undertaking their duties. These can include the power to require answers to questions and the power to enter premises.

12.2 Officers have powers delegated to them, under the relevant schemes of delegation, to undertake duties relating to the council.

12.3 Officers will carry an identity badge and their authorisation card (warrant) with them at all times, where they hold one. Where officer's do not have an authorisation card, delegation documentation can be supplied. In the event of any doubt with regard to an Officers' powers, confirmation can be obtained by contacting the officer's Line Manager who can provide any Statutory Notice describing their powers. It is an offence to obstruct an Authorised Officer who is conducting an inspection or investigation which could lead to prosecution.

## 13 CIVIL CLAIMS

13.1 Officers will not become involved in any negotiations on awarding reparation or compensation to victims following offences being committed.

13.2 Any enforcement action taken by the council is separate and distinct from any civil claims likely to be made by individuals. Enforcement action is not necessarily undertaken in all circumstances where civil claims may be pursued, nor is it undertaken to assist such claims.

13.3 The council may, on request, provide solicitors acting for individuals pursuing a civil claim, a factual report of the investigation. There may be a charge for this report.

## 14 COMPLAINTS PROCEDURE

14.1 The council aim to provide an efficient and fair enforcement service. In the first instance, most problems can be resolved with the officer dealing with the matter or with their Line Manager.

14.2 In the event that a person or business is not satisfied with the response received informally, the council has a formal complaints procedure which should be followed.

# Corporate Enforcement Policy

- 14.3 The council aims to acknowledge all formal complaints immediately and to provide an initial response within an allotted time as set out in the Complaints Procedure.
- 14.4 Please note that a complaint regarding a decision to prosecute cannot be progressed through the formal complaints procedure as this is a matter for the Court.
- 14.5 If a person is still dissatisfied having exhausted the council's complaints procedure, a complaint can be made to the Local Government and Social Care Ombudsman.

## 15 IMPLEMENTATION AND REVIEW

- 15.1 Implementation of the policy is the responsibility of all Enforcement Officers.
- 15.2 Departures from this policy will not occur without full consideration of all the circumstances and in consultation with the council's Legal Service save in exceptional or unforeseeable circumstances.
- 15.3 This policy will be reviewed and updated if any changes in legislation, guidance or other circumstances have a significant impact on the enforcement principles set out in this policy.

## 16 THE SCOPE OF EACH SERVICE

### 16.1 Planning - Development Control Management

- 16.1.1 The Planning Enforcement Team is empowered to investigate breaches of planning control and conditions. The team's role is to resolve such breaches by informal methods wherever possible and expedient, but, if necessary, through legal notices and court proceedings. Officers cannot intervene in non-planning matters such as boundary disputes and blocking off rights of way or matters controlled by other legislation such as building regulations or public nuisance.
- 16.1.2 Generally, enforcement action can only be pursued where works have taken place without the benefit of planning or the relevant permissions, such as Listed Building Consent, or where a development with the benefit of planning permission has not been undertaken in accordance with the approved plans/details or a condition attached to it.
- 16.1.3 Some development, including domestic extensions, regardless of impact on neighbours, may be immune from planning enforcement action due to elapse of time or if the works fall within permitted development rights will not be a breach of planning control. Enforcement notices cannot be issued in respect of anticipated breaches, however the use of injunctions is possible where it is considered necessary or expedient for an apprehended breach of planning control to be restrained by injunction. For example there is a serious issue where damages are unlikely to be an adequate remedy and the balance of convenience is in favour of granting an injunction. Otherwise, action for breaches can only be taken once an unauthorised development has commenced.
- 16.1.4 ~~Domestic extensions, regardless of impact on neighbours, may be immune from planning enforcement action if the works fall within permitted development rights. Any work commenced within the standard three year life of the permission, and built as approved are beyond further control. No action is possible in respect of anticipated breaches. Action can only be taken once an unauthorised development has commenced.~~
- 16.1.5 In addition to building works, planning enforcement can also apply to demolition in certain circumstances, material changes of use, alterations to listed buildings, advertisement signs and hoardings, and trees subject to Tree Preservation Orders or in a Conservation Area. Although technically not breaches of planning control, remedial action may also be taken against untidy land and buildings.

# Corporate Enforcement Policy

16.1.6 Complainants should note that, whilst the council, as the Local Planning Authority (LPA), does have a duty to investigate allegations of planning breaches, enforcement powers are discretionary and it is therefore foreseeable that some complainants will be disappointed with the outcomes where it is not considered expedient to take action. The planning system is designed to achieve a balance between competing demands in the public interest and enforcement of planning control reflects this by focusing on proportionate resolution rather than punishing those who have undertaken unauthorised work.

16.1.7 There are many different types of action available to the Planning Service when dealing with breaches of planning control. These may include:

- Informal Remedy.
- Service of Statutory Notices, such as an Enforcement Notice, Breach of Condition Notice or Stop Notice.
- Simple Caution.
- Injunction.
- Prosecution.
- No further action.
- Invite and application/regularisation.

16.1.8 The council's Planning Enforcement Plan and more details on the tools and powers available to the Planning Service can be found within the ***Local Planning Enforcement Plan*** which can be found on the council's website [www.cotswold.gov.uk](http://www.cotswold.gov.uk).

16.1.9 Priority Cases - Urgent and Immediate

- Complaints of serious irreparable harm to Listed Buildings or scheduled ancient monuments,
- Demolition works in a Conservation Area,
- Works to trees in Conservation Areas,
- Removal of ancient hedgerows,
- Work which may lead to substantial and/or permanent damage to a Site of Special Scientific Interest or other sites of known wildlife significance and important archaeological areas ~~Adverse impacts on wildlife habitats,~~
- Works to trees with Preservation Orders,
- Cases where the time-limit for enforcement action will expire imminently,
- Complaints of development taking place which are causing serious harm to amenity or safety,
- Non-compliance with effective notices,
- Works that would undermine one of the council's strategic priorities;
- ~~Complaints where an urgent response is likely to prevent serious harm to amenity or shorten the time taken to resolve the issue.~~
- Cases of transient unauthorised occupation of council land in accordance with s77 and s78 Criminal Justice and Public Order Act 1994 or s187b Town and Country Planning Act 1990.
- ~~Concerns (backed up by strong evidence) that a breach of control may occur in the future and a proactive response is required to prevent this happening,~~

# Corporate Enforcement Policy

- ~~Creation or erection of new dwellings or buildings.~~
- The council has signed up to the Gloucestershire Protocol for Managing Unauthorised Encampments. Where the council is identified as the lead authority, the council will take appropriate action in partnership with the Police and other agencies.
- [The council has signed up to the Memorandum of Understanding on the Prevention, Investigation, Enforcement and Prosecution of Heritage and Cultural Crime and Anti-Social Behaviour with Historic England.](#)

## 16.1.10 Other Cases

- A risk based approach will be adopted in relation to scale, impact, number of people affected, harm caused and effect on LPA's reputation. It should be noted that, where an investigation reveals additional breaches of planning control, the status of the complaint may be varied.

## 16.2 Building Control

16.2.1 The council has a statutory obligation to enforce Building Regulations and to be responsible for the building control function within its boundaries. The purpose of building regulations is to safeguard the health and safety of people in or around buildings. They also deal with energy conservation and with access and facilities for people in and around buildings.

16.2.2 [Enforcement will be carried out in accordance with the Code of Conduct for Registered Building Inspectors, The Regulators Code and the LABC Enforcement Policy which can be found in the Quality Management System.](#)

16.2.3 The Building Control Services within the council enforcement role encompasses the following:

- Enforcing Building Regulations through a process of plan checking and site inspection. [Any deviations from any approved planning permission \(if one were required for the works\) will be reported to the Planning Enforcement Team for separate investigation.](#)
- Ensuring that those responsible for the condition of buildings/structures maintain them in a safe condition.
- Ensuring that those responsible for the demolition of buildings observe conditions relating to health and safety.
- Responding to complaints.
- [Providing advice.](#)
- Arranging for works in default to be carried out where necessary.
- Initiating legal intervention, where necessary.

16.2.4 In the majority of cases the [Registered Building Inspector](#) ~~inspecting Building Control Surveyor~~ will try and solve any problem informally with the customer or their representative e.g. builder or architect. This will usually involve having any incorrect work already done altered [\(subject to discussions with the Planning Department\)](#) or, if the council has not been given the requisite notice to carry out an inspection, the work will need to be opened for inspection.

16.2.5 If these informal methods are unsuccessful, the [Registered Building Inspector](#) ~~inspecting Building Control Surveyor~~ may issue an Informal Notice detailing the offending items and giving a time period for compliance. If the Informal Notice is not complied with the [Registered Building Inspector](#) ~~Building Control Surveyor~~ may issue a Statutory Notice [in accordance with current legislation and the Quality Management Enforcement Policy.](#) Failure to comply with this could result in a prosecution.

# Corporate Enforcement Policy

16.2.6 The Registered Building Inspector Building Control Surveyor may also issue Statutory Notices for dangerous structures. These are given priority, followed by breaches of building regulations where the impact on the area or risk to the public is greatest.

## 16.3 **Housing**

16.3.1 Cotswold District Council – transferred its housing stock to Bromford Housing Group Limited.

16.3.2 The council has a statutory duty with regard to provision of accommodation for homeless people that falls within categories prescribed by legislation. The investigation of applications made through the council's Housing Options Team may also be subject to enforcement action. This could include civil remedies to recover property, but also criminal action such as a Simple Caution or prosecution.

16.3.3 Whilst the council no longer owns any social housing properties, as a prosecuting body it can act on behalf of Registered Social Landlords to take action and obtain information, under the Prevention of Social Housing Fraud Act 2013.

## 16.4 **Environmental Health Services- Environmental Protection and Food Health and Safety Environmental and Regulatory Services (ERS)**

16.4.1 The aim of the council's Environmental Health service is to maintain and improve the health of local communities through the provision of cost-effective advisory, investigation, inspection, monitoring or enforcement services for a range of issues. This will involve enforcing legal requirements in areas including:

- Environmental protection, including noise, nuisance and anti-social behaviour, air quality, contaminated land and private water supplies
- Private Sector Housing; the team works to make sure that private rented properties are safe and are well maintained and healthy places to live. They provide advice and assistance to both tenants and landlords to make sure a property meets the correct standards and complies with the relevant legislation and, where standards are not maintained, the team has powers of enforcement to ensure that works are carried out.
- Food Safety, including food poisoning, unfit food and private water supplies.
- Health and Safety at work, Health and Safety Breaches.
- Licensing, including the sale of alcohol, entertainment, animal licensing, caravan sites, houses in multiple occupation, hackney carriage and private hire vehicles, gaming machines, lotteries, street/house to house collections and street trading.
- Public health, private drainage and pest control regulation.
- Waste, including fly-tipping and environmental crime

16.4.2 The council has responsibility for Anti-Social Behaviour under the Anti-Social Behaviour, Crime and Policing Act 2014 and works with Gloucestershire police via the SOLACE multi-agency partnership. The types of ASB the council typically deals with range from environmental issues such as littering, and fly-tipping, and dog behaviour nuisance to personal ASB such as neighbour disputes, street drinking/ aggressive begging or substance misuse.

16.4.3 SOLACE work together with communities to prevent, investigate and tackle high risk anti-social behaviour (ASB) and provide ASB investigation, resolution and support services to all owner-occupier and private residents. They also supply some support and guidance to social landlords and housing associations where required

16.4.4 There are many different legislative powers and remedies available to Environmental Health Services when dealing with regulatory enforcement including but not limited to:

# Corporate Enforcement Policy

- Power to require information.
- Improvement Notices and, Prohibition Notices and Orders
- Civil Penalties for Private Sector Housing offences
- Fixed Penalty Notices
- Community Protection Notices and Community Protection Warnings.
- Injunctions and Criminal Behaviour Orders (In conjunction with the Police)
- S.20 Health and Safety at Work Act 1974 Powers for the purpose of carrying into effect any of the relevant Statutory Provisions.
- Works in default.
- Prosecution

16.4.5 The service is consulted on planning and licensing applications and where appropriate conditions are recommended.

16.4.6 The relevant Policies referred to in connection with enforcement issues for Environmental and Regulatory Health Services are listed in **Annex 1**. The responsibilities for decisions are also detailed therein.

## 16.5 Licensing

16.5.1 Licensing has a number of enforcement powers and duties to regulate the range of authorisations it is responsible for including The Licensing Act 2003, Gambling Act 2005, Animal Welfare, Hackney Carriage and Private Hire licensing, sex establishments, Pavement Licensing and other miscellaneous licensing and registrations.

16.5.2 The aim of the licensing team is to protect consumers, residents and businesses in the District through enforcing licensing regimes and associated legislation. It further ensures the integrity of the licensing regime, fairness and consistency.

16.5.3 A variety of enforcement options are set out below which could be used at any stage, they are not sequential.

- Advice - In the first instance and in most cases, consideration will be given to whether advice regarding a breach or potential breach of legislation is appropriate. When advice is given, it will normally be put in writing unless the breach is very minor or the matter is rectified on the spot. A written note or record of advice will be recorded and held on record.
- Warning Letter/Notice - In certain circumstances, it may be appropriate to issue a warning letter bringing alleged offences to the attention of the person responsible for the alleged breach indicating ways to avoid commission of similar offences in the future. A warning letter should be given when the requirements for a simple caution are not met or the need to formally record the caution is not applicable. In either case it is essential that sufficient admissible evidence is available to substantiate the offence. A written warning letter/notice will be recorded and held on record.
- Simple Caution - The council may issue a caution where there is sufficient evidence to prosecute but where the public interest is not served by issuing proceedings. A simple caution will be issued in accordance with this Corporate Enforcement Policy.

# Corporate Enforcement Policy

- **Licensing Review** – There are a number of statutory and discretionary licensing powers for a licensing authority to determine a review of a licence or other authorisation. Officers can request the licensing authority to review the licence because of an adverse matter arising in connection with any aspect of that licence or other authorisation.
- **Immediate Action(s)** - In certain cases, immediate action to suspend, revoke or otherwise restrict a licence or other authorisation can be taken to protect the public from harm.
- **Prosecution** - A prosecution is appropriate where there is a breach of a legal requirement, such that public safety, health, economic or physical well-being or the environment or environmental amenity is adversely affected.
- **Injunction**: in severe cases where either a previous significant breach has occurred, conviction followed, and the breach reoccurs a civil injunction may be appropriate. Equally, it may be that the breach is so significant in terms of protecting the public it is deemed necessary to issue an injunction without any other previous action having been taken.

## 16.6 Land and Property

16.6.1 The council will deal with enforcement in relation to land drainage matters. In most cases the owner of land next to a watercourse is the “Riparian Owner”. The legal responsibility for maintaining watercourses rests with the Riparian Owner. Where a watercourse passes over someone’s land, the Riparian Owner has to keep it clear to allow water to flow freely through it. Further, it is usually the landowner’s responsibility to maintain a watercourse that forms a boundary with a public highway.

16.6.2 Where the Flood Engineering Service investigates and gathers evidence which identifies that the Riparian Owner has failed to fulfil his/her duty, the council has the power to serve a notice under section 25 of the Land Drainage Act 1991. The Notice will include the nature of the works to be carried out and the period within which they are to be carried out.

16.6.3 If, following service of the Notice, the Riparian Owner fails to carry out the required works, the council can carry out the work and charge the owner for the costs incurred. The council can also take a prosecution in the Magistrates’ Court under Section 25(6)b, in addition to carrying out the work.

16.6.4 The council has signed up to the Gloucestershire Land Drainage Protocol. This sets out in more details the council’s powers and the procedure that will be used for land drainage enforcement.

16.6.5 Problems will be categorised as urgent or non-urgent. If a problem is categorised as urgent, attendance will be arranged as soon as possible. Examples of matters requiring urgent action may include blockages to a watercourse causing immediate or imminent flooding of property.

16.6.6 In the event that immediate urgent action is deemed necessary, arrangements will be made to send appropriate services to the scene without delay. If the situation appears to be life-threatening or dangerous, the public emergency services will be contacted.

## 16.7 Revenues and Benefits

16.7.1 Responsibility for investigating and prosecuting cases of Housing Benefit fraud has transferred to the Department for Work and Pensions. The council administers Housing

# Corporate Enforcement Policy

Benefit and still has the power to impose Civil Penalties (or fines) in relation to overpayments of Housing Benefit. In respect of Council Tax and the Council Tax Reduction Scheme (formerly Council Tax Benefit) the council has the ability to impose Civil Penalties as well as take criminal action, to include Cautions, penalties and prosecution. The council's policy in relation to the application of both civil and criminal sanctions can be found within the ***Council Tax, Housing Benefit and Council Tax Support Penalty and Prosecution Policy*** which can be found on the council's website [www.cotswold.gov.uk](http://www.cotswold.gov.uk)

16.7.2 In relation to National Non Domestic Rates, the council may commence civil or criminal proceedings where appropriate.

## 16.8 ~~Counter Fraud Unit~~ Counter Fraud and Enforcement Unit

16.8.1 The ~~Counter Fraud Unit~~ Counter Fraud and Enforcement Unit (CFEU) is a support service offering investigation and assistance with enforcement and criminal action across the council. The CFEU has a specific responsibility to investigate all allegations of fraud received whether perpetrated by internal or external parties. The CFEU will work to support other enforcement teams within the council where appropriate and will take action to include offering Cautions, imposing fines /penalties and commencing prosecution proceedings as applicable.

16.8.2 The remit of the CFEU encompasses investigating issues such as internal or employee fraud, theft, procurement or contract fraud, tenancy and housing fraud, and any other area as requested.

16.8.3 The CFEU will consider criminal proceedings in all cases where offending contrary to any of the following has occurred, although the list is not exhaustive:

- Theft Acts 1968 and 1978.
- Forgery and Counterfeiting Act 1987.
- Computer Misuse Act 1990.
- Social Security Administrative Act 1992.
- Local Government Finance Act 1992.
- Data Protection Regulations / Legislation.
- Identity Card Act 2006.
- Fraud Act 2006.
- The Bribery Act 2010 (with the consent of the Director of Public Prosecutions or the Serious Fraud Office).
- Welfare Reform Act 2012.
- The Prevention of Social Housing Fraud Act 2013.
- Council Tax Reduction Scheme (Detection of Fraud and Enforcement) (England) Regulations 2013.

## 16.9 **Parking Services**

16.9.1 Parking Enforcement is carried out under the Traffic Management Act 2004.

16.9.2 Civil Enforcement Officers are employed to enforce ~~on and~~ off-street parking for the ~~Boroughs, District and County Council~~. This service may be contracted out or conducted by an in-house service.

16.9.3 A Penalty Charge Notice can be issued if a vehicle is parked in contravention of the restrictions which are in force.

# Corporate Enforcement Policy

## 16.10 **Liaison with other Agencies**

- 16.10.1 The council will maintain effective mechanisms for communication and liaison with all its services and other agencies and may have a joint enforcement role where appropriate.
- 16.10.2 If another agency is better able to provide a service in any particular case, the council will either:
  - (a) pass on the relevant details to that agency and, where appropriate, advise the complainant and contravener accordingly or
  - (b) give contact details of the other agency to the complainant in order for them to make direct contact.

## 16.11 **Publicity**

- 16.11.1 The council may actively inform the media of impending prosecutions, with the aim of drawing their attention to the court case. After the case the council may publicise any conviction which could serve to draw attention to the need to comply with legislation or deter anyone tempted to break the law.

# Corporate Enforcement Policy

## ANNEX 1 ENVIRONMENTAL ~~HEALTH AND REGULATORY SERVICES~~

### 1 CURRENT POLICIES RELEVANT TO ENFORCEMENT CONSIDERATIONS

Private Sector Housing Policy: ~~Forest of Dean District Council, West Oxfordshire District Council and Cotswold District Council.~~

#### HMO Amenity Standards

Civil Penalties and Enforcement Policy for Housing Offences under the Housing and Planning Act 2016.

Charging for Notice Policy under the Housing Act 2004. Forest of Dean District Council, West Oxfordshire District Council and Cotswold District Council.

Guidance Note for Gloucestershire Authorities, reference: Protocol between Local Housing Authorities and Fire and Rescue Authorities to improve fire safety. Forest of Dean DC, Cotswold DC only.

Houses in Multiple Occupation and Other Domestic Premises: Oxfordshire Fire and Rescue Service

Organisational Document: Technical Guidance Note.

Mobile Homes Policy: ~~Forest of Dean District Council, West Oxfordshire District Council and Cotswold District Council.~~

Hackney Carriage and Private Hire Licensing Policy.

Street Trading Policy.

### 2 PROCESS RESPONSIBILITIES FOR ~~ENVIRONMENTAL~~ HEALTH ERS DECISIONS

The Service has what can be broadly summarised as a three stage approach to enforcement to ensure solutions are initially sought through education, co-operation and agreement.

These may be dictated internally, through the adoption of service standards or they may be dictated externally; for example, legislation and statutory guidance require risk assessments for food safety inspection programmes which will determine future inspection frequency.

However, situations brought to light through inspections or complaints will be dealt with according to their seriousness.

At one extreme, this would mean no action for minor and trivial issues, whilst at the other; it could mean the prohibition of an activity or business operation.

Priority, risk and action relate to each other through this staged approach to enforcement.

A low risk offence may proceed through each stage until compliance is achieved, although the evidential and public interest test considerations will apply. A high risk offence is likely to proceed directly to stage 3.

**Stage 1**

- Advice
- Verbal warning
- Informal letters

# Corporate Enforcement Policy

- Initial inspections and visits
- Acceptable Behaviour Contracts
- Formal letters
- Written warnings
- Negotiated solutions

**Stage 2**

- Formal Notices (requiring remedial action), Fixed Penalty Notices, Orders
- Warrants

**Stage 3**

- Court injunction
- Emergency action
- Works in default/seizure of goods
- Civil Penalty - Housing and Planning Act 2004
- Warrants
- Review and /or revocation of licences and approvals
- Simple caution
- Prosecution
- Removal of unauthorised or dangerous structures or abandoned vehicles.

## 3 DECISION MAKING

### Responsibility for decisions at each stage

**Stage 1:** Decisions to take these actions will rest with the Investigating Officers

**Stage 2:** The Case Officer shall review the case with the relevant Principal Officer or Service Leader before a decision is made, except with respect to the following which fall under Stage 1:

- Notices with respect to abandoned vehicles
- Fixed penalty notices with respect to littering, fly-tipping and abandoned vehicles
- Notices requiring information

**Stage 3:** The Investigating Officer must carry out compile an enforcement review\* of the case for the attention of the Principal Officer or the Service Leader. For prosecution or civil penalty (Private Sector Housing), the case shall be reviewed

# Corporate Enforcement Policy

by a Legal Officer and Service Leader or Service Business Manager independent of the investigation. Certain types of cases, in accordance with the Officer Delegation Rules, may have to be referred to the relevant committee for approval.

## **Emergency Action**

Where urgent or immediate action is required, decisions will rest with the duly delegated and authorised investigating officer.

## Equality and Rurality Impact Assessment Form

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

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

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

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

**1. Persons responsible for this assessment:**

Names: Emma Cathcart		
Date of assessment: 21.11.2025	Telephone: 01285 623000	Email: <a href="mailto:Emma.Cathcart@cotswold.gov.uk">Emma.Cathcart@cotswold.gov.uk</a>

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

Corporate Enforcement Policy	
Is this a new or existing one? Existing	

**3. Briefly describe its aims and objectives**

<p>The policy sets out the Council's enforcement tools, and the considerations adopted when determining whether enforcement action should be taken and if so, what that action should be taken.</p> <p>Training to be delivered and awareness to be raised after adoption of the policy to ensure the appropriate application of enforcement activities.</p> <p>The Policy is applicable to enforcement staff across the Council and impacts members of the public.</p> <p>Prosecutions will only be considered where the evidential and public interest tests are met with due consideration to the welfare of individuals. Appropriate enforcement activity acts as a deterrent and benefits the public as a whole.</p>	
---	--

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

Yes - legislation

## 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	<input type="checkbox"/>	
Comparisons between similar functions / policies elsewhere	X	Comparison and inclusion of existing Policy across partner Council's. Departmental Policies.
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	X	Consultation with legal representatives, service leads and corporate management. National guidance.

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

N/A

## 7. Has any consultation been carried out?

Yes

## Details of Consultation

Consultation with Legal Representatives across the Partnership

Consultation with Enforcement Lead Officers across the Partnership

Consultation with Corporate Leadership Team

If NO please outline any planned activities

--

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

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>
LOW – Few members of the general public/staff will be affected by this proposal	<input checked="" type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>
Comments: e.g. Who will this specifically impact? Individuals who are subject to enforcement action.	

## 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			x		
Age – Old People		x		The Policy provides that enforcement action may not be appropriate in relation to older offenders	
Disability		x		The Policy provides that enforcement action may not be appropriate in cases where the offender has a disability	
Sex – Male			x		
Sex – Female			x		
Race including Gypsy and Travellers			X		
Religion or Belief			X		
Sexual Orientation			X		
Gender Reassignment			X		
Pregnancy and maternity			X		
Geographical impacts on one area			X		
Other Groups		x		The Policy provides that enforcement action may not be appropriate in cases where the offender lacks mental capacity	
<b>Rural considerations:</b> ie Access to services; leisure facilities, transport; education; employment; broadband.			X		

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

Action(s)	Lead Officer	Resource	Timescale


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

No

#### Declaration

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where 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:	Emma Cathcart	Date:	21.11.2025
Line Manager:	David Stanley	Date:	18/12/2025
Reviewed by Corporate Equality Officer:		Date:	

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Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET – 8 JANUARY 2026</b>
Subject	<b>ENFORCEMENT AGENT COMMISSIONING</b>
Wards affected	All
Accountable member	Cllr Patrick Coleman – Cabinet Member for Finance Email: <a href="mailto:patrick.coleman@cotswold.gov.uk">patrick.coleman@cotswold.gov.uk</a>
Accountable officer	Jon Dearing – Executive Director Email: <a href="mailto:Democratic@Cotswold.gov.uk">Democratic@Cotswold.gov.uk</a>
Report author	Mandy Fathers – Business Manager for Environmental, Welfare and Revenues Email: <a href="mailto:Democratic@Cotswold.gov.uk">Democratic@Cotswold.gov.uk</a>
Summary/Purpose	To seek approval to initiate a procurement process to tender for the provision of Enforcement Agent services
Annexes	Annex A – Equality Impact Assessment
Recommendation(s)	<p>That Cabinet resolves to:</p> <ol style="list-style-type: none"> <li>1. Approve the process to undertake a procurement exercise to appoint enforcement agent services for the council</li> <li>2. Note that the procurement exercise will be undertaken via a Dynamic Purchasing System; and in partnership with five other Local Authorities</li> </ol>
Corporate priorities	<ul style="list-style-type: none"> <li>• Supporting Communities</li> <li>• Delivering Good Services</li> </ul>
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, Managing Director (Publica) Cabinet Member for Finance



## **1. EXECUTIVE SUMMARY**

**1.1** The purpose of this report is to seek formal approval to initiate a procurement process to tender for the provision of Enforcement Agent services. The current contract is due to expire on 2 October 2026, and a new contact is required to ensure continuity of service and compliance with procurement regulations.

## **2. BACKGROUND**

**2.1** The Enforcement Agent service is a critical function that supports the Council in recovering outstanding debts such as:

- Council Tax arrears
- Business Rates
- Parking Fines
- Sundry Debts

**2.2** The main current contract, held by Bristow and Sutor, and the secondary contract, held by Rossendale's has been in place since 2 October 2021 and is reaching the end of its contract terms.

## **3. MAIN POINTS**

**3.1** The use of enforcement agents and debt collection agencies is an absolute last resort, but they are an essential resource to have available to ensure that debts due to the Council are paid. Multiple efforts to put in place affordable repayment arrangements are always offered prior to referring to an external debt agency, but these either fall into default and are not resumed, or debtors choose to ignore them altogether.

**3.2** In order to satisfy current legislative requirements in respect of contracting, the Council is required to undertake a tendering exercise to procure Enforcement Agent companies to ensure that continued recovery support is available for those debts detailed within paragraph 2.1 (above).

**3.3** It is proposed that the Council undertakes an open tender process via a Dynamic Purchasing System (DPS) in partnership with five other Councils:

- Cheltenham Borough
- The Forest of Dean
- Stroud

- Tewkesbury Borough
- West Oxfordshire

**3.4** The contract will be awarded for a period of 3 years, with an option to extend for a further 2 years, subject to performance.

**3.5** Key elements of the tender will include:

- Compliance with the Taking Control of Goods Regulations 2013
- Ethical enforcement practices
- Data protection and GDPR compliance
- Social value commitments

#### **4. FINANCIAL IMPLICATIONS**

**4.1.** The Enforcement Agent service is delivered at no direct cost to the Council, with fees recovered from the debtor in accordance with legislation. However, internal resource will be required to manage the procurement and ongoing contract monitoring. This will be met through existing budgets.

#### **5. LEGAL IMPLICATIONS**

**5.1.** The Council's Contract Procedure Rules provide that the Council may enter existing public-sector framework agreements where it is evident that such frameworks represent the optimum solution to the Council in terms of service and cost. The enforcement process for enforcement agents is governed by the Taking Control of Good (Fees) Regulations 2014.

#### **6. RISK ASSESSMENT**

**6.1** The formal tendering process has been timetabled to put in place a new enforcement provision on or around the expiration of the previous Contract(s). If the recommendations within the report are not approved the Council will not hold a valid Contract with an external Enforcement Agency for its provision of debt recovery. This could lead to an impact on the level of debt collected.

#### **7. EQUALITIES IMPACT**

**7.1.** An Equality Impact Assessment has been completed that shows no adverse impact on any protected characteristics.

## **8. CLIMATE CHANGE IMPLICATIONS**

**8.1.** None

## **9. ALTERNATIVE OPTIONS**

**9.1.** There are no alternative options. In order for the Council to be able to maximise its collection of debts an external enforcement agency is required

## **10. BACKGROUND PAPERS**

**10.1.** None.

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**Equality Impact Assessment Form**

1. Persons responsible for this assessment:

Names: Mandy Fathers	
Date of assessment: 18/11/2025	Telephone: 01285 623571 Email: mandy.fathers@cotswold.gov.uk

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

Procurement of Enforcement Agency for the recovery of council debt
--

3. Briefly describe its aims and objectives

To enter into a procurement process to contract an external enforcement agency to support the council in its debt collection processes
--

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

Taking Control of Goods Regulations 2014 Local Government Finance Act 1992, Local Government Finance Act 1988, Breathing Space (The Debt Respite Scheme)
--

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"/>	Data from current enforcement agents activities, including complaints



Recent research findings including studies of deprivation	<input type="checkbox"/>	
Results of recent consultations and surveys	<input type="checkbox"/>	
Results of ethnic monitoring data and any equalities data	<input type="checkbox"/>	
Anecdotal information from groups and agencies within Gloucestershire	<input type="checkbox"/>	
Comparisons between similar functions / policies elsewhere	<input type="checkbox"/>	
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	<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?

N/A

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	<input checked="" type="checkbox"/> <input type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>

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			✓	Young people are not enforceable by these measures and so, no impact	
Age – Old People			✓	The proposal is inclusive to all ages	Evaluation of the tender and future contract management will use complaints and any other data available to review any disproportionate impact
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 on maternity, 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 to all other groups that are not mentioned	
<b>Rural considerations:</b> ie Access to services; leisure facilities, transport; education; employment; broadband.			✓	The proposal is inclusive to the whole of Cotswold district	

10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale
Procurement Exercise	Mandy Fathers/Procurement Team	Other Leads within the other Gloucestershire LA's as this is a joint procurement exercise	Aim to commence January/February 2026 with contract awarded and in place prior to the existing one ending

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

Completed By:	Mandy Fathers	Date:	18/11/25
Line Manager:	Jon Dearing	Date:	21.11.25
Reviewed by Corporate Equality Officer:	Cheryl Sloan	Date:	21/11/2025

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# Agenda Item 13



**COTSWOLD**  
District Council

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET - 8 JANUARY 2026</b>
Subject	<b>2026/27 FEES AND CHARGES</b>
Wards affected	All
Accountable member	Cllr Patrick Coleman, Cabinet Member for Finance Email: <a href="mailto:Patrick.Coleman@Cotswold.gov.uk">Patrick.Coleman@Cotswold.gov.uk</a>
Accountable officer	David Stanley, Deputy Chief Executive Email: <a href="mailto:Democratic@Cotswold.gov.uk">Democratic@Cotswold.gov.uk</a>
Report author	David Stanley, Deputy Chief Executive Email: <a href="mailto:Democratic@Cotswold.gov.uk">Democratic@Cotswold.gov.uk</a>
Summary/Purpose	The purpose of this report is to present a revised schedule of fees and charges for 2026/27. The report also describes the rationale for the revised charges compared to current charges for 2025/26. Revised charges are presented at Annex A alongside current charges for 2025/26
Annexes	Annex A – Schedule of Fees and Charges
Recommendation(s)	That Cabinet resolves to: <ol style="list-style-type: none"><li>1. Endorse the rationale for revising fees and charges as set out in the report;</li><li>2. Approve the delegation of future decisions regarding the setting of Special Area of Conservation Fees to the Head of Planning Services in consultation with the Deputy Leader and Cabinet Member for Housing and Planning;</li><li>3. Approve the changes to car parking arrangements detailed in section 4 of the report to align with the Car Parking Strategy approved on 20 November 2025; and</li><li>4. Approve the implementation of revised fees and charges for 2026/27 as detailed in Annex A from 1 April 2026.</li></ol>



Corporate priorities	<ul style="list-style-type: none"><li>• Delivering Good Services</li><li>• Supporting Communities</li><li>• Supporting the Economy</li></ul>
Key Decision	YES
Exempt	NO
Consultees/ Consultation	The Fees and Charges schedule for 2026/27 has been developed in consultation with the Council's statutory officers, Publica management, Ubico management, and members of the Cabinet.



## **1. EXECUTIVE SUMMARY**

**1.1** The purpose of this report is to present a revised schedule of fees and charges for 2026/27. The report also describes the rationale for the revised charges compared to current charges for 2025/26. Revised charges are presented at Annex A alongside current charges for 2025/26.

**1.2** With effect from 1 April 2026, it is recommended that many charges are increased by 3.8% in line with the Consumer Prices Index (as measured at September 2025) in order to keep pace with general price inflation. This ensures that chargeable services continue to raise additional revenue so as not to place further pressure on the 2026/27 revenue budget.

**1.3** All proposed charges disclosed in this report are rounded to the nearest 50p, £1, or £5 as appropriate. All charges are also inclusive of VAT where applicable to show the actual price to be paid by the service user.

## **2. BACKGROUND**

**2.1** Discretionary Fees and charges are reviewed annually as part of the budget setting process. The charges presented in this report will be reflected in the estimates presented as part of the budget and medium-term financial strategy to be proposed by Cabinet and determined by Full Council on 23 February 2026.

## **3. MAIN POINTS**

**3.1** It is recommended that the following services increase fees and charges by 3.8% with effect from 1 April 2026. Some individual charges will be slightly higher or lower than 3.8% due to rounding (see paragraph 1.3):

- Waste and Recycling – Containers and Bulky Waste Collection.
- Building Control.
- Street Naming and Numbering of Properties.
- Local Land Charges.
- High Hedge Complaints.
- Legal Services.
- Legal and Estates (Property Transactions).
- Licensing (Excluding HMO Fees).



- Private Water Supply Testing.
- Animal Warden – Admin charge.
- Food Health and Safety (except for SFBB diary sheets which have been increased by more than 3.8% to fully recover printing costs).
- Cemeteries.

**3.2** The following services are either freezing charges at 2025/26 levels or proposing an alternative to a 3.8% increase:

- Waste and Recycling – A £4 increase for the Garden Waste Annual Subscription is recommended.
- Planning - Following a Planning Advisory Service review, Pre-Application Fees and Other Discretionary Charges have been fundamentally reviewed and rationalised accordingly.
- Section 106 Agreements – Charges will be indexed in line with the BCIS CIL Index (2.3% for 2026) as set out in the report approved by Cabinet on 13 March 2023.
- Biodiversity Net Gain (BNG) Monitoring Fees – Charges have been reviewed and updated to deliver full cost recovery for this activity.
- Special Area of Conservation (SAC) Fees - Fees are regularly reviewed in consultation with other participating Councils. To facilitate partnership working and ensure fees are consistent across all Councils, it is recommended that future decisions relating to SAC Fees are delegated to the Head of Planning Services in consultation with the Deputy Leader and Cabinet Member for Housing and Planning.
- Housing in Multiple Occupation (HMO) Licences – Licences are now issued for five years instead of three years and charges have been updated accordingly.
- Regulation of Pollution from Industrial Sources – Fees have been reviewed and updated in line with neighbouring authorities.
- Car Parking – Several changes are recommended in order to align with the Car Parking Strategy approved by Cabinet on 20 November 2025. This is detailed in Section 4 of this report.
- Public Conveniences – Charges will increase by 10p to 50p. Responsibility for the facility at Market Place, Northleach will be transferred to Northleach with Eastington Town Council from 1 April 2026.



### Fees and Charges Limited by Statute

**3.3** Some fees and charges are set or capped by Central Government and are therefore outside of the scope of this report. These include:

- Statutory Planning Application Fees.
- Alcohol and Entertainment Licences.
- Charges set out in the Environmental Permitting Regulations (2016).

## **4. CAR PARKING**

**4.1** This report proposes freezing pay and stay charges of one hour or less at 2025/26 levels (excluding Maugersbury Road Car Park, Stow on the Wold – see paragraph 4.5 below). Charges for longer stays and season tickets will be increased by an average of 4.8% in order to generate an overall increase in parking revenue of 3.8% compared to the 2025/26 budget.

**4.2** On 20 November 2025, Cabinet approved and adopted the Cotswold District Council Car Parking Strategy 2025-2028. In addition, Cabinet approved the Car Parking Action Plan at Annex A of the strategy.

**4.3** The Action Plan includes changes to car parks at Bourton on the Water and Stow on the Wold. Making changes to the car parks will require a variation to the Parking Order.

**4.4** Cabinet approved two recommendations to propose changes to vary the Parking Order. The first proposal is to vary the charging times at Rissington Road car park, Bourton on the Water from 8am -6pm to 10am -8pm. Season tickets will also be made available for purchase for this car park.

**4.5** The second proposal is to introduce a tourist levy at Maugersbury Road Car Park, Stow on the Wold, to generate funds specifically dedicated to dealing with the impact of tourism on the town subject to the statutory parking order process. The proposal is to introduce the same levy as Bourton on the Water, currently 60p per transaction.

## **5. ALTERNATIVE OPTIONS**

**5.1** An alternative option to that presented in this report would be to freeze all fees and charges at 2025/26 levels. However, this option is not recommended for the following reasons:



- Chargeable services would recover a smaller proportion of their costs from service income and would require additional financial support from General Fund resources.
- Additional savings proposals would be needed to replace the income to be generated from increased charges and balance the 2026/27 revenue budget.

## **6. CONCLUSIONS**

**6.1** This report recommends that most chargeable services increase their fees and charges with effect from 1 April 2026. As well as ensuring chargeable services continue to recover a significant proportion of their costs from sales, fees and charges income, the additional revenue that will be generated will make a significant contribution towards balancing the revenue budget for 2026/27.

## **7. FINANCIAL IMPLICATIONS**

**7.1** The proposals set out in this report are estimated to generate an additional £309,000 per annum in income from sales, fees and charges; of which £129,000 will be generated from Car Parking charges. This excludes revenue generated from the proposed tourist levy for Maugersbury Road Car Park, Stow on the Wold which is earmarked for dealing with the impact of tourism on the town. It is proposed that the revised charges are implemented from 1 April 2026 meaning this additional revenue is fully reflected in the Medium-Term Financial Strategy and Revenue Budget Estimates for 2026/27.

## **8. LEGAL IMPLICATIONS**

**8.1** Section 93 Local Government Act 2003 gives the local authority a power to charge for discretionary services if the recipient of the service has agreed to provision of that service. This extends to charging for enhancements to a mandatory service. The aim of the power is to recover the costs of a service. Under section 93(3), the local authority is under a duty to secure that from one financial year, the income from charges for services does not exceed the costs of provision. Under Section 93(6), the local authority must have regard to the statutory guidance "*General Power for Best Value Authorities to Charge for Discretionary Services – Guidance on the Power in the Local Government Act 2003*".



## **9. RISK ASSESSMENT**

**9.1** The income estimates presented in this report will be included within the 2026/27 revenue budget estimates and are based on the fees and charges schedule included at Annex A. The estimates assume the proposed increases will not have a material adverse impact on demand. However, should demand be affected by the proposed increases, there is a risk that the proposals set out in this report will not generate income to match the estimates to be included within the 2026/27 revenue budget.

## **10. EQUALITIES IMPACT**

**10.1** With regard to the proposals set out in this report (subject to approval), the Equalities Impact has been considered by Members and Officers participating in the development and decision-making process. Potential impacts on those with protected characteristics alongside other groups that experience discrimination have been given due consideration.

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

**11.1** There are no climate change or ecological emergencies implications.

## **12. BACKGROUND PAPERS**

**12.1** The following documents have been identified by the author of the report in accordance with section 100D.5(a) of the Local Government Act 1972 and are listed in accordance with section 100 D.1(a) for inspection by members of the public:

- None.

(END)

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Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
<b>BINS AND RECYCLING</b>		
<b><u>Waste and Recycling</u></b>		
<b>Garden Waste *</b>		
Annual Subscription (1 April to 31 March)	69.00	73.00
Lost Green Waste Licence	10.00	10.50
<b>Bins and Recycling Containers *</b>		
Recycling boxes, food waste caddies and recycling bags		
- Collected from Council Office Locations	Free	Free
- Delivered	6.00	6.00
Garden Waste Bins / General Waste Bins	11.00	11.50
Five beige council-issue refuse sacks for extra rubbish	6.50	6.50
<b>Bulky Waste Collection *</b>		
Collection of up to three items	28.00	29.00
Collection of more than three items (maximum of six)	per item	5.50
		5.50

\* A 50% reduction in charges apply to those in receipt of Council Tax Support or Housing Benefit

## PLANNING AND BUILDING

### Planning

#### Pre-Application Fees and Other Discretionary Charges

*Following a service review, the Discretionary Planning fee tariff has been updated resulting in a number of 2025/26 charges being discontinued or amalgamated with the proposed fee structure for 2026/27.*

#### General Advice

Advice to determine:

- whether planning permission is required	96.00	100.00
- whether building consent is required	130.00	160.00

Provision of straightforward advice to householders	96.00	250.00
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Provision of complex advice to householders (including advice relating to development proposals for listed buildings)	640.00	665.00
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#### Supplementary charges:

- each subsequent hour of officer time above the stated limit (to be agreed in advance)	64.00	66.00
- any subsequent response to further amendments	255.00	265.00
- any subsequent meeting or site visit	190.00	195.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
<b>Small Scale Minor Development</b>		
- 1 dwelling (including replacement dwellings and holiday let/tourist accommodation)	845.00	875.00
Supplementary charges:		
- each subsequent hour of officer time above the stated limit (to be agreed and paid in advance)	64.00	66.00
- any subsequent response to further amendments	190.00	195.00
- any subsequent meeting or site visit	320.00	330.00
<b>Large Scale Minor Development</b>		
- 2 to 9 (inclusive) dwellings (including replacement dwellings and holiday let/tourist accommodation)	1,280.00	1,330.00
Supplementary charges:		
- each subsequent hour of officer time above the stated limit (to be agreed and paid in advance)	77.00	80.00
- any subsequent response to further amendments	190.00	195.00
- any subsequent meeting or site visit	320.00	330.00
<b>Small Scale Major Applications</b>		
- 10 to 199 (inclusive) residential units	2,560.00	2,660.00
Supplementary charges:		
- each subsequent hour of officer time above the stated limit (to be agreed and paid in advance)	96.00	100.00
- any subsequent response to further amendments	320.00	330.00
- any subsequent meeting or site visit	640.00	665.00
<b>Large Scale Major Applications</b>		
- 200 or more residential units	5,120.00	5,310.00
Supplementary charges:		
- each subsequent hour of officer time above the stated limit (to be agreed and paid in advance)	130.00	135.00
- any subsequent response to further amendments	640.00	665.00
- any subsequent meeting or site visit	960.00	995.00
<b>Planning Performance Agreement (PPA)</b>		bespoke
<b>Additional Specialist Services</b>		
Biodiversity Net Gain Advice		
- Small Sites	215.00	
- Major Development	330.00	
- Review of Habitat Management and Monitoring Plan's for proposed habitat banks	932.00	
- Enforcement Advice Service	615.00	
- Design Advice for Householder Retrofit Projects	200.00	
- Forward Planning Advice Service	850.00	

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
- Affordable Housing Schemes - Schemes for 100% AH providing high level strategic advice.		Free
Validation Check Service		
- Householder and Minor Development	60.00	
- Major Development	120.00	
Admin charge for applications not submitted on the Planning Portal i.e postal or email (per application)	32.00	85.00
Charging for invalid applications (that have not been made valid within 28 days or as indicated/agreed by the Councils validation team)		
Householder Advertisments:	64.00	66.00
Certificates of Lawfulness and Prior notifications:	64.00	66.00
Minor Applications:	130.00	135.00
Major Applications:	255.00	265.00
Copy of Decision Notice, TPO, Appeal Decision Notice, Enforcement Notices etc (per document)	38.50	40.00
Copy of S106 Agreement (per document)	64.00	66.00
Charges for paper copies of applications:		
- Charge per whole application should all documents be requested		
Per Householder:	32.00	33.00
Minor Developers:	64.00	66.00
Major Developers:	130.00	135.00
- Charges per plan (per sheet)		
A0:	10.50	11.00
A1:	9.00	9.50
A2:	8.00	8.50
A3:	7.00	7.50
A4:	6.00	6.00
Subsequent Copies A4:	0.50	0.50

**Building Control****New Dwellings**

One Dwelling (Total floor area below 300m2)

- Charge	820.00	850.00
- Building Notice	925.00	960.00

Two or more Dwellings

Price on Application

**Domestic and Commercial Extensions to a Single Building****Charge**

Erection / Extension of a garage (30m2 to 60m2)	360.00	375.00
Garage conversion to habitable accommodation	330.00	345.00
Loft conversion up to 100m2	630.00	655.00
Loft conversion over 100m2	Price on Application	
Extension up to 20m2	575.00	595.00
Extension 20m2 up to 60m2	865.00	900.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
Extension 60m <sup>2</sup> up to 100m <sup>2</sup>	1,150.00	1,190.00
Extension over 100m <sup>2</sup>	Price on Application	
<b><u>Building Notice</u></b>		
Erection / Extension of a garage (30m <sup>2</sup> to 60m <sup>2</sup> )	395.00	410.00
Garage conversion to habitable accommodation	365.00	380.00
Loft conversion up to 100m <sup>2</sup>	695.00	720.00
Loft conversion over 100m <sup>2</sup>	Price on Application	
Extension up to 20m <sup>2</sup>	635.00	660.00
Extension 20m <sup>2</sup> up to 60m <sup>2</sup>	950.00	985.00
Extension 60m <sup>2</sup> up to 100m <sup>2</sup>	1,270.00	1,320.00
Extension over 100m <sup>2</sup>	Price on Application	
<b><u>Other Work</u></b>		
Value: Under £1,000	160.00	165.00
Value: £1,001 to £5,000	300.00	310.00
Value: £5,001 to £10,000	390.00	405.00
Value: £10,001 to £20,000	530.00	550.00
Value: £20,001 to £30,000	720.00	745.00
Value: £30,001 to £40,000	950.00	985.00
Value: Over £40,000	Price on Application	
Electrical installations if not using a competent electrical engineer	Price on Application	
New windows install by non FENSA opp – up to 8 windows	150.00	155.00
New windows install by non FENSA opp – over 8 windows	Price on Application	
Other Services (e.g. completion certificates, advisory work)		
Charge per hour	80.00	83.00
<b><u>Street Naming</u></b>		
<b>Naming and numbering of new properties including commercial buildings</b>		
1 to 5 plots (per plot)	77.00	80.00
6 to 25 plots	665.00	690.00
26 to 75 plots	1,040.00	1,080.00
76 to 150 plots	1,480.00	1,540.00
151 to 250 plots	1,850.00	1,920.00
251 to 350 plots	2,210.00	2,290.00
351 to 500 plots	2,580.00	2,680.00
500 or more plots	2,950.00	3,060.00
Block of flats: up to 20 flats	235.00	245.00
Block of flats: 21-50 flats	325.00	335.00
Block of flats: 51+ flats	435.00	450.00
<b>Additional charges where new street names are required</b>		
1 to 5 new street names	295.00	305.00
6 to 10 new street names	590.00	610.00
10 or more new street names	740.00	770.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
<b>Additional charge where new Court names are required</b>		
Per Court name	175.00	180.00
<b>Other Charges</b>		
Change of address	77.00	80.00
Allocating a name to a property or allocating a number to a named property	77.00	80.00
Change of a commercial building address	77.00	80.00
Change of street name at residents, developers or parish/town council request	470.00	490.00
Plus additional charge per property/unit where consultation with existing residents is to be carried out by the Council	41.50	43.00
Providing a letter of certification (optional - by request only)	27.00	28.00
Charge for a developer amending plans after naming and numbering has commenced (additional plot fee also applies if new plots added)	160.00	165.00
<b>Local Land Charges</b>		
LLC1 only (Non-VAT)	22.50	23.50
CON29 only	170.00	175.00
Part II	26.50	27.50
Any enquiries (Part III)	26.50	27.50
<b>Section 106 Agreements</b>		
Registration Charge	550.00	565.00
Monitoring Charges:		
- Fewer than 10 Dwelling Units	550.00	565.00
- 10 to 100 Dwelling Units	1,100.00	1,130.00
- 101 to 250 Dwelling Units	5,510.00	5,640.00
- 251 or more Dwelling Units	11,010.00	11,260.00
<b>Biodiversity Net Gain (BNG) Monitoring Fees *</b>		
Site size	Standard Difficulty of Enhancement/Creation Works	
Small 0 – 5ha	Low	2,666.00
	Medium	3,759.00
	High	4,430.00
Medium 5 – 20ha	Low	4,013.00
	Medium	4,684.00
	High	6,326.00
Large 20 – 40ha	Low	6,326.00
	Medium	7,793.00
	High	8,420.00
Over 40ha	N/A	bespoke
Linear habitats only	N/A	bespoke

\* 5% is added to fees if 7 or more habitats are being created

Service Area/ Description of Fees		2025/26 Charges	2026/27 Charges
		£	£

**Special Area of Conservation (SAC)**

Cotswold Beechwoods	Strategic Mitigation Contribution *	673.00	673.00
	Admin Fee	125.00	130.00
North Meadow (Inner Zone)	Strategic Access Mgt & Monitoring **	812.00	836.21
	Admin Fee	125.00	130.00
North Meadow (Outer Zone)	Strategic Access Mgt & Monitoring **	332.00	356.21
	Admin Fee	125.00	130.00

\* Cost per unit

\*\* Cost per unit. Contributions for Suitable Accessible Natural Greenspace are additional.

**High Hedge Complaints**

Fee to register complaint	Standard	850.00	880.00
	In receipt of Housing Benefit/ Council Tax Support	100.00	105.00

**Legal Services**

Litigation Fees	Per Hour	250.00	260.00
Section 106 Agreements	Per Hour	250.00	260.00

**Legal and Estates (Property Transactions)****Standard Legal Fees (Minimum) \***

New Commercial Lease	595.00	620.00
Renewal Leases (on agreement with tenant)	115.00	120.00
Deed of Variation (at Tenant request)	300.00	310.00
Licence to Alter	300.00	310.00
Licence to Assign / Underlet	300.00	310.00
Deed of Grant/Release	595.00	620.00
Deed of Surrender	300.00	310.00
Licence for Use	180.00	185.00
Disposal (at other party request)	595.00	620.00
Easements	595.00	620.00
Footpaths per hour plus disbursements	100.00	105.00
Third Party Rates for responding to external enquiries	140.00	145.00
Copy Documents	25.00	26.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
<b>Standard Estates Fees *</b>		
Deed of Variation (at Tenant request)	300.00	310.00
Licence to Alter	300.00	310.00
Licence to Assign / Underlet	300.00	310.00
Deed of Grant/Release	420.00	435.00
Deed of Surrender	300.00	310.00
Letter Licence	60.00	62.00
Licence for Use	180.00	185.00
Disposal (at other party request)	595.00	620.00
Schedule of Condition (fee depends on property size)	115.00 to 595.00	120.00 to 620.00

\* Legal and Estates Fee  
 Exclusions:  
 Council Contractors occupying property for service provision  
 Local Charities  
 Community Organisations (Not for Profit)

\* The above schedule of Legal and Estates fees excludes VAT. Whether VAT is payable will depend on numerous factors associated with each specific transaction.

#### Departure from Legal and Estates Fee Schedule

In exceptional circumstances or if it is in the interest of the Council's commercial property portfolio, the Head of Legal Services, in respect of Legal fees or the Assistant Director with responsibility for Assets, in respect of Estates fees, can agree a reduction or waiver of fees, in consultation with the appropriate Cabinet Member whose portfolio includes Property and Assets.

#### LICENSING

##### Cosmetic

##### **(Acupuncture, Ear piercing, Electrolysis, Tattooing, semi-permanent skin colouring)**

Per premises	153.00	159.00
Per practitioner	59.00	61.00

##### Hackney Carriage and Private Hire

##### **Hackney Carriage & Private Hire Dual Driver (3 Year)**

New Application	330.00	343.00
Renewal	244.00	253.00
Transfer of Private Hire Driver to Dual Driver Licence	65.00	67.00

##### **Hackney Carriage Vehicle**

New Application	330.00	343.00
Renewal	244.00	253.00

##### **Private Hire Vehicle**

New Application	330.00	343.00
Renewal	244.00	253.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £	
<b>Private Hire Operator Licence</b>			
5 Year - New/Renewal	530.00	550.00	
1 Year - New/Renewal	133.00	138.00	
<b>Other Charges</b>			
Transfer of vehicle licence to another person	30.00	31.00	
Transfer of vehicle licence to another vehicle (1 year)	217.00	225.00	
Transfer of vehicle licence to another vehicle (remainder of plate)	103.00	107.00	
Temporary Vehicle Licence (Insurance Company)	301.00	312.00	
Change of Registration Number	103.00	107.00	
Knowledge Test	100.00	104.00	
Replacement Drivers Badge	33.00	34.00	
Replacement External Plate	40.00	42.00	
Replacement Internal Plate	33.00	34.00	
Vehicle Bracket	12.00	12.00	
Administration charge for any other requests	30.00	31.00	
Driver Assessment Taxi Test	At Cost	At Cost	
Safeguarding Training Course	At Cost	At Cost	
Disclosure and Barring Service (DBS) Check	At Cost	At Cost	
Enhanced Disclosure and Barring Service (DBS) Certificate	At Cost	At Cost	
<b>Animal Licences</b>			
<b>Providing Boarding in Kennels</b>			
Dogs - New Application	up to 50 dogs	357.00	371.00
Dogs - Renewal	up to 50 dogs	304.00	316.00
Dogs - New Application	over 50 dogs	417.00	433.00
Dogs - Renewal	over 50 dogs	364.00	378.00
Cats - New Application	up to 50 cats	357.00	371.00
Cats - Renewal	up to 50 cats	304.00	316.00
Cats - New Application	over 50 cats	417.00	433.00
Cats - Renewal	over 50 cats	364.00	378.00
<b>Providing Day Care for Dogs (does not apply to home environment premises or boarding in kennels)</b>			
New Application	up to 50 dogs	357.00	371.00
Renewal	up to 50 dogs	304.00	316.00
New Application	over 50 dogs	417.00	433.00
Renewal	over 50 dogs	364.00	378.00
<b>Breeding of dogs (veterinary fees are additional)</b>			
New Application		463.00	481.00
Renewal		364.00	378.00
<b>Hiring out horses (veterinary fees are additional)</b>			
New Application		530.00	550.00
Renewal		364.00	378.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
<b>Home boarding for dogs (daytime or overnight care within the home environment)</b>		
New Application	357.00	371.00
Renewal	304.00	316.00
<b>Pet Shops/Selling animals as pets</b>		
New Application	357.00	371.00
Renewal	304.00	316.00
<b>Keeping or training animals for exhibition</b>		
New Application	357.00	371.00
Renewal	290.00	301.00
<b>Supplementary Animal Activity Fees</b>		
Franchise Licence – Dog Boarding only (1)	132.00	137.00
Host Fee (2)	156.00	162.00
Additional Activity (3)	54.00	56.00
Inspection Fee (4)	144.00	149.00
Re-Rating Fee (5)	151.00	157.00
Variation Fee – e.g. amendment to a licence	30.00	31.00
Dog Breeding/Horse Riding Establishments Recharge Admin Fee	30.00	31.00
Notes:		
(1) Host fees will be required in addition to this licence		
(2) Required per host family of a dog boarding franchise		
(3) Payable in addition to licence fees where more than one activity is undertaken at the same premises		
(4) Payable if an inspection is required in addition to the initial inspection included within the licence fee		
(5) Inspection and licence amendment for re-rating of the current star rating		
<b>Dangerous Wild Animals</b>		
New Application	444.00	461.00
Renewal	391.00	406.00
<b>Zoos (traditional urban zoos, safari parks, specialist butterfly houses, aquaria)</b>		
New Application	With dispensation 1,543.00	1,602.00
Renewal	With dispensation 2,087.00	2,166.00
New Application	Without dispensation 2,464.00	2,558.00
Renewal	Without dispensation 3,471.00	3,603.00
<b>Scrap Metal</b>		
Dealer (Site) licence	530.00	550.00
Collectors' Licence	371.00	385.00
Variation to collectors or dealer (site) licence	80.00	83.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
<b><u>Street Trading</u></b>		
Street trading - food	869.00	902.00
Street trading - non food	530.00	550.00
Specialist market e.g. farmers market, Cirencester Christmas market (maximum of two days per month in one location)	1,029.00	1,068.00
Prime Sites:		
- Clapton Road, Bourton on the Water	1,729.00	1,795.00
- High Street, Chipping Campden	1,729.00	1,795.00
- Riverside, Lower Slaughter	1,729.00	1,795.00
- High Street, Moreton in Marsh	1,729.00	1,795.00
- The Square, Stow on the Wold	1,729.00	1,795.00
- Lay-by opposite Trout Farm, Bibury	2,384.00	2,475.00
- Market Place, Cirencester (no trading permitted Monday or Friday)	2,384.00	2,475.00
Street trading for other time periods:		
Street trading for non-prime site (for consecutive four week period or calendar month)	166.00	172.00
Street trading for up to one calendar month or for a consecutive four week period in the year (for a prime site costing £2,079 annually)	239.00	248.00
Street trading for up to one calendar month or for a consecutive four week period in the year (for a prime site costing £1,507 annually)	174.00	181.00
Specialist market operating in one location for one day per year	331.00	344.00
Specialist market operating for up to seven consecutive days in a year at one location.	464.00	482.00
<b><u>Pavement Licence (2 Year Licence)</u></b>		
New Application	199.00	207.00
Renewal	161.00	167.00
<b><u>Gambling Act 2005</u></b>		
<b><u>Betting Premises (Excluding Tracks)</u></b>		
New Premises	2,529.00	2,625.00
Vary Premises	1,265.00	1,313.00
Transfer of premises	1,012.00	1,050.00
Reinstatement of premises	1,012.00	1,050.00
Provisional statement	2,529.00	2,625.00
New premises with provisional statement	1,012.00	1,050.00
Annual fee	503.00	522.00
Copy of licence	25.00	25.00
Notification of change	42.00	44.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
<b>Small Casino</b>		
New Premises	6,745.00	7,001.00
Vary Premises	3,372.00	3,500.00
Transfer of premises	1,518.00	1,576.00
Reinstatement of premises	1,518.00	1,576.00
Provisional statement	6,745.00	7,001.00
New premises with provisional statement	2,529.00	2,625.00
Annual fee	4,215.00	4,375.00
Copy of licence	25.00	25.00
Notification of change	42.00	44.00
<b>Large Casino</b>		
New Premises	8,430.00	8,750.00
Vary Premises	4,215.00	4,375.00
Transfer of premises	1,812.00	1,881.00
Reinstatement of premises	1,812.00	1,881.00
Provisional statement	8,430.00	8,750.00
New premises with provisional statement	4,215.00	4,375.00
Annual fee	8,430.00	8,750.00
Copy of licence	25.00	25.00
Notification of change	42.00	44.00
<b>Regional Casino</b>		
New Premises	12,646.00	13,127.00
Vary Premises	6,323.00	6,563.00
Transfer of premises	5,480.00	5,688.00
Reinstatement of premises	5,480.00	5,688.00
Provisional statement	12,646.00	13,127.00
New premises with provisional statement	6,745.00	7,001.00
Annual fee	12,646.00	13,127.00
Copy of licence	25.00	25.00
Notification of change	42.00	44.00
<b>Bingo Premises</b>		
New Premises	2,951.00	3,063.00
Vary Premises	1,475.00	1,531.00
Transfer of premises	1,012.00	1,050.00
Reinstatement of premises	1,012.00	1,050.00
Provisional statement	2,951.00	3,063.00
New premises with provisional statement	1,012.00	1,050.00
Annual fee	843.00	875.00
Copy of licence	25.00	25.00
Notification of change	42.00	44.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
<b>Tracks</b>		
New Premises	2,108.00	2,188.00
Vary Premises	1,055.00	1,095.00
Transfer of premises	801.00	831.00
Reinstatement of premises	801.00	831.00
Provisional statement	2,108.00	2,188.00
New premises with provisional statement	801.00	831.00
Annual fee	843.00	875.00
Copy of licence	25.00	25.00
Notification of change	42.00	44.00
<b>Family entertainment Centres</b>		
New Premises	1,686.00	1,750.00
Vary Premises	843.00	875.00
Transfer of premises	801.00	831.00
Reinstatement of premises	801.00	831.00
Provisional statement	1,686.00	1,750.00
New premises with provisional statement	801.00	831.00
Annual fee	632.00	656.00
Copy of licence	25.00	25.00
Notification of change	42.00	44.00
<b>Adult Gaming Centres</b>		
New Premises	1,686.00	1,750.00
Vary Premises	843.00	875.00
Transfer of premises	1,012.00	1,050.00
Reinstatement of premises	1,012.00	1,050.00
Provisional statement	1,686.00	1,750.00
New premises with provisional statement	1,012.00	1,050.00
Annual fee	843.00	875.00
Copy of licence	25.00	25.00
Notification of change	42.00	44.00
<b>Caravan and Campsites</b>		
Fee for depositing site rules	43.50	45.00
Application for a new site licence		
5 or fewer caravans	365.00	380.00
6 to 24 caravans	495.00	515.00
25 to 99 caravans	585.00	605.00
100 to 199 caravans	685.00	710.00
over 199 caravans	775.00	805.00
Annual fee for existing site licence		
5 or fewer caravans	305.00	315.00
6 to 24 caravans	410.00	425.00
25 to 99 caravans	505.00	525.00
100 to 199 caravans	590.00	610.00
over 199 caravans	685.00	710.00
Transfer/amendment of an existing site licence	94.00	98.00
Administrative and other expenses to serve notice under the Mobile Homes Act 2013	355.00	370.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
Fit and Proper Person Assessment	n/a	275.00
Fit and Proper Person compliance fee	n/a	86.00

**Housing in Multiple Occupation (Five-Year Licence)****New Application**

Application	250.00	245.00
Licence Issue Fee (if application successful)	590.00	1,115.00
Total Fee	840.00	1,360.00
Additional Room Fee (7 rooms or more)	40.00	41.50

**Renewal Application - Terms and Conditions apply \***

Application	250.00	245.00
Licence Issue Fee (if application successful)	520.00	1,010.00
Total Fee	770.00	1,255.00
Additional Room Fee (7 rooms or more)	20.00	21.00

\* Renewal discount will not apply if:

- The completed renewal application is not received at least 28 days before the expiry of the existing licence.
- Documents required to validate the application are not received prior to expiry of the existing licence; or on a later date as advised following the application being processed.
- Structural or significant changes to the HMO since the previous licence was granted, such as extensions and new rooms, for which a variation request has not previously been received.
- Any outstanding enforcement action.
- Any significant hazard is identified on renewal inspection.
- Any breach of licence conditions or management regulations is identified on renewal inspection.

Charges for Housing Act Notices	355.00	370.00
Organising works in default (cost per hour)	n/a	50.00

**ENVIRONMENT****Private Water Supplies****Private Water Supply Services**

Risk assessment (fee per hour)	61.00	63.00
Sampling (each visit, fixed fee), or investigation	115.00	120.00
Granting and Authorisation (fixed fee, plus hourly rate applies)	115.00	120.00

**Sampling Analysis**

Taken under Regulation 10	Price on Application
Taken during Group A monitoring	Price on Application
Taken during Group B monitoring	Price on Application

**Regulation of Pollution from Industrial Sources**

Administration Charge	25.00	31.00
Contaminated Land Information Request	80.00	100.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
<b><u>Animal Warden</u></b>		
Statutory Fee	25.00	25.00
Admin charge	89.00	92.00
Kennelling (per day)	At Cost	At Cost
Veterinary fees	At Cost	At Cost
<b><u>Food Health and Safety</u></b>		
<b>Export of Food Products</b>		
Food Export Health Certificate (including first hour of officer time)	71.00	74.00
DEFRA Export Health Certificate	140.00	145.00
Officer hourly rate after first hour	50.00	52.00
<b>Other Products and Services</b>		
Safer Food, Better Business Information Pack	18.50	19.00
Food Hygiene Rating Re-visit	215.00	225.00
Condemned Food Certificate	105.00	110.00
SFBB Diary sheets	4.50	11.20
<b><u>Cemeteries</u></b>		
<b>For the interment, in a grave including the reopening of a grave</b>		
Of the body of still-born or a child whose age at the time of death did not exceed 16 years	No charge	No charge
Of the body of a person whose age at the time of death exceeded 16 years	940.00	975.00
Charge for extra depth (interment at a depth exceeding seven feet)	415.00	430.00
Additional fee for the interment of a coffin/casket exceeding seven feet two inches long or 32 inches wide	395.00	410.00
Interment of cremated remains in a burial garden, a grave or a vault, in respect of which an exclusive right of burial has been granted	295.00	305.00
Interment of a body part in a grave	395.00	410.00
<b>Exclusive rights of burial - granted for a period of 50 years</b>		
For the exclusive right of burial in an earthen grave nine feet by four feet	1,220.00	1,270.00
For the exclusive right of burial in an earthen grave four and a half feet (grave of a still-born child or a child not exceeding the age of 16 years)	925.00	960.00
For the exclusive right of burial of cremated remains in a burial garden	295.00	305.00
<b>Memorials and inscriptions</b>		
For the right to erect a memorial on an earthen grave in respect of which the exclusive right of burial has been granted (this fee includes the first inscription)	540.00	560.00
For the right to erect a memorial on a cremated remains grave in a burial garden in respect of which the exclusive right of burial has been granted (this fee includes the first inscription)	175.00	180.00
For each inscription after the first / Replacement memorials	110.00	115.00

Service Area/ Description of Fees	2025/26 Charges £	2026/27 Charges £
<b>Other Charges</b>		
For the use of the Chesterton Cemetery Chapel	185.00	190.00
To transfer the ownership of exclusive rights of burial	98.00	102.00
For a copy of Deed of Grant for exclusive rights of burial	54.00	56.00
Search of burial fees and/or records covering a period of one year	27.00	28.00
Search of burial fees and/or records covering a period beyond one year	65.00	67.00
Scattering of cremated remains	87.00	90.00

**PARKING, TRAVEL AND VISITORS****Car Parking****Season Ticket Charges**

Off-Peak - 8am to 10am and 4pm to 6pm	12 Months	65.00	70.00
Off-Peak Plus - 8am to 10am and 4pm to 6pm	12 Months	85.00	90.00
plus Saturdays and Sundays.	12 Months	85.00	90.00
- Off-Peak Tickets cover all district car parks excluding Market Place Cirencester, Market Square Chipping Campden or The Chipping, Tetbury			

Whiteway Car Park	Mon-Fri 7am to 7pm	1 Month	44.00	46.00
		3 Months	130.00	137.00
		6 Months	260.00	273.00
		12 Months	520.00	545.00
Abbey Grounds, Cirencester	All Day	3 Months	290.00	304.00
		6 Months	580.00	608.00
		12 Months	1,160.00	1,215.00
Old Station, Cirencester	All Day	3 Months	195.00	204.00
		6 Months	390.00	408.00
		12 Months	780.00	815.00
Sheep Street, Cirencester	All Day	3 Months	195.00	204.00
		6 Months	390.00	408.00
		12 Months	780.00	815.00
The Waterloo, Cirencester	All Day	3 Months	195.00	204.00
		6 Months	390.00	408.00
		12 Months	780.00	815.00
Old Market Way, Moreton-in-Marsh	All Day	3 Months	140.00	147.00
		6 Months	280.00	293.00
		12 Months	560.00	585.00
Maugersbury Road, Stow-on-the-Wold	All Day	3 Months	145.00	153.00
		6 Months	290.00	305.00
		12 Months	580.00	610.00

Service Area/ Description of Fees			2025/26 Charges	2026/27 Charges
			£	£
West Street, Tetbury	All Day	3 Months	160.00	168.00
		6 Months	320.00	335.00
		12 Months	640.00	670.00
Rissington Road, Bourton-on-the-Water	All Day	3 Months		204.00
		6 Months		408.00
		12 Months		815.00
Powells School permit, Abbey Grounds or Waterloo car parks	Mon-Fri 8:30 to 9am and 3pm to 3:40pm	12 Months	55.00	60.00
Season Ticket Refund Administration Fee			18.00	20.00
<b>Off-Street Parking - Pay and Display/Cashless Charges</b>				
Abbey Grounds, Cirencester	Open 7 days inc. overnight	30 minutes	1.00	1.00
	Charges apply:	1 hour	2.00	2.00
	Mon-Sat: 8am to 6pm	2 hours	3.60	3.80
	Sun: 12pm to 6pm	3 hours	4.70	4.90
		5 hours	6.40	6.70
		10 hours	9.50	10.00
Beeches, Cirencester	Open 7 days inc. overnight	30 minutes	1.00	1.00
	Charges apply:	1 hour	2.00	2.00
	Mon-Sat: 8am to 6pm	10 hours	3.20	3.40
	Sun: 10am to 6pm	2 days	6.40	6.80
		3 days	9.60	10.20
		4 days	12.80	13.60
		5 days	16.00	17.00
		6 days	19.20	20.40
		7 days	22.40	23.80
Brewery, Cirencester	Open 7 days inc. overnight	30 minutes	1.00	1.00
	Charges apply:	1 hour	2.00	2.00
	Mon-Sat: 8am to 6pm	2 hours	3.60	3.80
	Sun: 10am to 6pm	3 hours	4.70	4.90
Forum, Cirencester	Open 7 days inc. overnight	30 minutes	1.00	1.00
	Charges apply:	1 hour	2.00	2.00
	Mon-Sat: 8am to 6pm	2 hours	3.60	3.80
	Sun: 10am to 6pm	3 hours	4.70	4.90
Leisure Centre, Cirencester	Open 7 days inc. overnight	30 minutes	1.00	1.00
	Charges apply:	1 hour	2.00	2.00
	Mon-Sat: 8am to 6pm	2 hours	3.60	3.80
	Sun: 10am to 6pm	3 hours	4.70	4.90

Service Area/ Description of Fees			2025/26 Charges	2026/27 Charges
			£	£
Old Station, Cirencester	Open 7 days inc. overnight	30 minutes	1.00	1.00
	Charges apply:	1 hour	2.00	2.00
	Mon-Sat: 8am to 6pm	2 hours	3.60	3.80
	Sun: 10am to 6pm	3 hours	4.70	4.90
		5 hours	6.40	6.70
		10 hours	9.50	10.00
Queen Street, Cirencester	Open 7 days inc. overnight		Free	Free
Sheep Street, Cirencester	Open 7 days inc. overnight	30 minutes	1.00	1.00
	Charges apply:	1 hour	2.00	2.00
	Mon-Sat: 8am to 6pm	2 hours	3.60	3.80
	Sun: 12pm to 6pm	3 hours	4.70	4.90
		5 hours	6.40	6.70
		10 hours	9.50	10.00
Trinity Road, Cirencester	7am to 7pm weekends and bank holidays only		Free	Free
Waterloo, Cirencester	Open 7 days inc. overnight	30 minutes	1.00	1.00
	Charges apply:	1 hour	2.00	2.00
	Mon-Sat: 8am to 6pm	2 hours	3.60	3.80
	Sun: 10am to 6pm	3 hours	4.70	4.90
		5 hours	6.40	6.70
		10 hours	9.50	10.00
Old Market Way, Moreton-in-Marsh	Open 7 days inc. overnight	30 minutes	0.80	0.80
	Charges apply:	1 hour	1.20	1.20
	Mon-Sat: 8am to 6pm	2 hours	2.30	2.40
	Sun: 10am to 6pm	10 hours	3.20	3.40
Fosseway, Stow-on-the-Wold	Open 7 days inc. overnight		Free	Free
Maugersbury Road, Stow-on-the-Wold	Open 7 days inc. overnight	30 minutes	1.00	1.60
	Charges apply:	1 hour	2.00	2.60
	Mon-Sat: 8am to 6pm	2 hours	3.60	4.40
	Sun: 10am to 6pm	3 hours	4.70	5.50
		5 hours	6.40	7.30
		10 hours	9.50	10.60
Church Street, Tetbury	Open 7 days inc. overnight	30 minutes	0.80	0.80
	Charges apply:	1 hour	1.50	1.50
	Mon-Sat: 8am to 6pm	2 hours	2.60	2.70
	Sun: 12pm to 6pm	3 hours	3.60	3.80
Old Railyard, Tetbury	Open 7 days inc. overnight		Free	Free

Service Area/ Description of Fees			2025/26	2026/27
			Charges	Charges
			£	£
West Street, Tetbury	Open 7 days inc. overnight	30 minutes	0.80	0.80
	Charges apply:	1 hour	1.50	1.50
	Mon-Sat: 8am to 6pm	2 hours	2.60	2.70
	Sun: 12pm to 6pm	3 hours	3.60	3.80
		10 hours	4.60	4.80
Rissington Road, Bourton-on-the-Water	Open 7 days inc. overnight	2 hours	4.20	4.40
	Charges apply:	3 hours	5.30	5.50
	Mon-Sat: 10am to 8pm	5 hours	7.00	7.30
	Sun: 10am to 6pm	10 hours	10.10	10.60
Motorcycle Parking			Free in designated bay	

**Public Toilets**

Bibury, The Street GL7 5NP	0.40	0.50
Bourton on the Water, Church Rooms GL54 2AX	0.40	0.50
Bourton on the Water, Rissington Road GL54 2DR	0.40	0.50
Chipping Campden, Sheep Street GL55 6DX	0.40	0.50
Cirencester, Forum Car Park GL7 2PF	0.40	0.50
Fairford, High Street GL7 4AF	0.40	0.50
Lechlade, Burford Street GL7 3AJ	0.40	0.50
Moreton in Marsh, High Street GL56 0AH	0.40	0.50
Northleach, Market Place GL54 3EJ	Free	* See Note
Stow-on-the-Wold, Market Square, GL54 1AB	0.40	0.50
Tetbury, West Street GL8 8LL	0.40	0.50

\* To be managed by Northleach with Eastington Town Council from 1 April 2026



Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET – 8 JANUARY 2026</b>
Subject	<b>COUNCIL PRIORITY AND SERVICE PERFORMANCE REPORT – 2025-26 QUARTER TWO (JULY-SEPTEMBER 2025)</b>
Wards affected	All
Accountable member	Councillor Mike Evemy, Leader of the Council Email: <a href="mailto:mike.evemy@cotswold.gov.uk">mike.evemy@cotswold.gov.uk</a>
Accountable officer	Jane Portman, Chief Executive Email: <a href="mailto:jane.portman@cotswold.gov.uk">jane.portman@cotswold.gov.uk</a>
Report author	Alison Borrett, Senior Performance Analyst Email: <a href="mailto:alison.borrett@cotswold.gov.uk">alison.borrett@cotswold.gov.uk</a>
Summary/Purpose	To provide an update on progress on the Council's priorities and service performance
Annexes	Annex A - Corporate Plan Action Tracker Annex B - Council Priorities Report Annex C - Performance Indicator Report
Recommendation(s)	That Cabinet resolves to:  1. Note overall progress on the Council priorities and service performance for 2025-26 Q2 (July-September 2025).
Corporate priorities	<ul style="list-style-type: none"> <li>• Preparing for the Future</li> <li>• Delivering Good Services</li> <li>• Responding to the Climate Emergency</li> <li>• Delivering Housing</li> <li>• Supporting Communities</li> <li>• Supporting the Economy</li> </ul>
Key Decision	NO
Exempt	NO
Consultees/	CDC Corporate Leadership Team, Publica Directors, Business



**COTSWOLD**  
District Council

Consultation

Managers, Service Managers and Service Leads.



## **1. BACKGROUND**

**1.1** A high-level commissioning statement was approved by Cabinet in January 2020 which sets out the relationship between Publica and the Council and their respective responsibilities. Publica must ensure that it provides the necessary information to the Council so it can assess whether the commissioned services are being delivered in accordance with the agreed quality and standard. In essence, Publica as contracting agent for the Council must ensure that the Council has sufficient information to challenge the performance of services provided by Publica and others. Publica also provides performance data on services transferred back to the Council. A similar approach is taken in relation to financial performance data, which will be presented to the Chief Executive and the Chief Finance Officer; and where it will be for the Chief Finance Officer to advise in terms of assurance.

**1.2** The Council's Chief Executive is responsible for reviewing and approving the information provided in this report prior to its publication.

## **2. COUNCIL PRIORITY REPORT**

**2.1** The Council adopted its Corporate Plan 2025–2028 ("the Plan") in September 2025. The Plan outlines the Council's purpose, vision, values, key priorities, and measures of success.

**2.2** Progress on key actions identified in the Corporate Plan for Q2 (July-September 2025) include:

- Proposals for Local Government Reorganisation have been prepared, including options for one and two unitary authorities. These were considered by Overview and Scrutiny on 17 November and Full Council on 26 November, with Cabinet making the final decision later that day. A new programme and portfolio management approach is being planned to support the next phase.
- People & Culture Strategy and Year 1 Implementation Plan were agreed by Cabinet in September 2025, alongside workforce values and a supporting Communications & Engagement strategy, helping embed organisational culture change.
- Digital Transformation initiatives are progressing, including exploration of AI solutions to improve council services and accessibility. Meetings with Lead Members and ICT are scheduled to assess feasibility and cost-benefit.



- Preventing Homelessness Strategy 2025–2030 was adopted in September 2025. Regular monitoring and annual reviews will ensure actions remain on target to support vulnerable residents.
- Town and Parish Council engagement strengthened through a June summit attended by over 100 councillors and clerks, followed by a new newsletter and ongoing dialogue to prepare for Local Government Reorganisation and Local Plan engagement.
- Crowdfund Cotswold autumn round launched in July, with four projects seeking funding and three undergoing verification checks, continuing to promote community-led initiatives.
- Green Economic Growth Strategy delivery is underway following Cabinet adoption in March 2025. Actions are overseen by the Cotswold Economic Advisory Group to drive sustainable economic development.
- Tourism Destination Management Plan refresh progressed with a joint bid for Strategic Economic Development Fund support submitted in summer. A decision is expected in November.
- Strengthening Local Communities events have delivered 10 of 14 planned sessions, engaging over 600 residents with free activities, food, and support from local partners, tailored to community priorities.

**2.3** An overview of progress against all actions in the Corporate Plan is attached at Annex A and the Council Priority highlight report is attached at Annex B.

### **3. SERVICE PERFORMANCE**

**3.1** Overall, the Council's performance shows strong progress in key areas, alongside some ongoing challenges. Council Tax collection is ahead of expectations, and Non-Domestic Rates continue to improve year on year. Planning determination times for major and other applications remain above target, and customer satisfaction is exceptionally high. Leisure services also performed well, with sustained engagement in gym memberships and leisure centre visits. However, processing times for Council Tax Support and Housing Benefit change events, while improving, remain above target due to cumulative averages and operational complexities linked to Universal Credit migration. Land Charges performance was affected by staffing pressures late in the quarter, and environmental performance faces challenges, with household recycling rates impacted by seasonal factors and wider national trends.

**3.2** Service performance above target:

- Percentage of Council Tax Collected (59.29% against the quarterly target of 57%)



- Processing times for Council Tax Support New Claims (19.91 days against a target of 20 days)
- Percentage of Housing Benefit overpayment due to LA error/admin delay (0.32% against a target of 0.35%)
- Customer Satisfaction (99.29% against a target of 90%)
- Percentage of major planning applications determined within agreed timescales (100% against a target of 70%)
- Percentage of other planning applications determined within agreed timescales (91.7% against a target of 90%)
- Percentage of high risk food premises inspected within target timescales (100% against a target of 95%)
- Percentage of high risk notifications risk assessed within 1 working day (100% against a target of 95%)
- Residual Household Waste per Household (kg) (85.91 against a target of 97)
- Missed bins per 100,000 (49 against a target of 80)
- Number of gym memberships (4,774 against a target of 4,300)
- Number of visits to the leisure centres (154,011 visits against a target of 129,000)

**3.3** Service Performance near target:

- Percentage of Non-domestic rates collected (54.37% against the quarterly target of 57%)
- Percentage of FOI requests answered within 20 days (87.69% against a target of 90%)
- Percentage of minor planning applications determined within agreed timescales (88.24% against a target of 90%)

**3.4** Service Performance below target:

**Processing times for Council Tax Support Change Events (9.69 days against a target of 5 days) and Housing Benefit Change of Circumstances (9.56 days against a target of 4 days).**

The Council saw a reduction in processing times for both Council Tax Support (CTS) change of events and Housing Benefit (HB) changes of circumstances compared to Q1. However, cumulative averages remain above the respective targets of 5 days for CTS and 4 days for HB, with CTS changes averaging 9.69 days and HB changes averaging 9.56 days.



The improvement in CTS processing times was largely driven by automation enhancements and the clearance of a backlog during Q1. Around 85% of income-related changes were batch processed during the quarter, significantly accelerating turnaround times. Notably, the average CTS processing time for July to September was just 3.45 days, well within target.

While further improvements are anticipated, the cumulative nature of the metric means it is unlikely to fall within target before the end of the financial year.

Housing Benefit continues to present challenges. The team are prioritising Full Claim Reviews mandated by the DWP, which are often complex and subject to delays in receiving full supporting evidence.

Working-age Housing Benefit claimants have fallen by around 97%, reducing to single figures as most claimants have migrated to Universal Credit. The HB caseload now primarily consists of pension-age claimants and temporary accommodation cases. With fewer HB changes occurring, any delay has a more pronounced impact on average processing times.

To support residents and strengthen financial resilience, the Council continues to deliver targeted initiatives through the Low Income Family Tracker (LIFT). Campaigns include:

- Benefit Maximisation: Helping residents claim underclaimed benefits such as Pension Credit, Attendance Allowance, and Council Tax Support, ensuring households receive their full entitlement.
- Pension Credit Campaign: Focused outreach to eligible pension-age households to increase take-up of Pension Credit and related benefits, unlocking significant financial support for residents.
- Healthy Start & Free School Meals: Promoting schemes that provide nutritious food for families with young children and school-age children.
- Warm Homes Campaign: Signposting residents to energy support, including the Warm Home Discount, to help reduce fuel poverty and energy costs.

These initiatives are helping to reduce financial vulnerability and ensure residents receive the support they are entitled to.

### **Percentage of Planning Appeals Allowed (cumulative) (52.08% against a target of 30%)**

Between 1 July and 30 September 2025, 17 planning appeals were determined. Of these, 9 were allowed in favour of the applicant and 1 resulted in a split decision, giving an allowance rate of 52.94% for the quarter.



As this measure is cumulative, from 1 April to 30 September a total of 24 appeals have been decided, with 12 allowed and 1 split decision, resulting in a cumulative allowance rate of 52.08%. This figure may fluctuate throughout the year as more appeal decisions are received.

While the general target is for no more than 30% of appeals to be allowed, the Growth and Infrastructure Act 2013 introduced a formal system for assessing the performance of local planning authorities. Under the designation criteria, an authority may be identified as underperforming if 10% or more of its total planning decisions are overturned at appeal.

This measure of decision quality is assessed over a rolling two-year period and is applied separately to major and non-major development categories. It's important to note that the 10% threshold is based on the total number of decisions made, not just those that are appealed. Authorities exceeding this threshold in either category may be designated, allowing applicants to submit certain types of applications directly to the Secretary of State.

**Number of affordable homes delivered (cumulative) (20 delivered against a target of 50).**

In Cotswold, eighteen affordable homes were delivered during Q2, bringing the year-to-date total to 20. Projections from Registered Providers show 64 completions for 2025/26, well below the target of 100, making it unlikely the district will meet its goal. The delivery of affordable housing is subject to fluctuations, as most developments take over a year to complete and often progress in multiple phases over several years. Early overdelivery at the beginning of the current strategy has also contributed to the dip in recent annual outputs, as the early years set a higher baseline.

Since the adoption of the Local Plan in 2018, the district has delivered approximately 880 affordable homes, averaging around 125 homes per year. Despite the recent dip in completions, this continues to reflect the Council's ongoing commitment to delivering affordable housing and meeting long-term housing needs in the area.

**Percentage of official land charge searches completed within 10 days (76.07% against a target of 90%)**



The Council's performance against the 10-day target for completing official Land Charges searches declined in Q2, falling from 95.07% in Q1 to 76.07%, below the 90% target.

Performance remained strong through July and August, consistently exceeding target (97.64%), but a sharp drop in September impacted the quarterly average. This was primarily due to the long-term absence of a Land Charges team member, which reduced resilience across the service. Despite these challenges, the average turnaround time for searches was only 6.82 days, remaining below the 10-day target. To address this, additional support has been deployed from the Customer Service and Support Service Team, enabling specialist staff to focus on completing searches. These measures are expected to stabilise performance and improve continuity going forward.

#### **Percentage of household waste recycled (56.29% against a target of 62%)**

During Q2, the Council's household recycling rate fell by 2.5% compared to the same quarter last year, reflecting a wider national trend influenced by seasonal and structural factors.

Despite the recent dip, Cotswold continues to demonstrate strong performance. According to the latest 2023/24 national results on local authority waste management, the district ranks within the top 25 councils in England for household recycling and remains firmly in the top quartile nationwide. This achievement underscores the Council's sustained commitment to environmental stewardship and effective waste management practices.

Nationally, recycling rates continue to face challenges, and Cotswold is no exception. During the summer months, the district experienced unusually dry weather, which led to a 25% drop in garden waste tonnage compared to the same period last year. Because garden waste represents a significant share of the recycling stream, this seasonal decline has had a noticeable impact on overall recycling performance.

- 3.5** A full performance report is attached at Annex C.
- 3.6** As previously agreed, where possible, broader benchmarking has been included in the full performance report to gain a more robust and insightful evaluation of



performance. Where benchmarking data is not currently available or outdated, this is noted, and further investigations will be undertaken to look at options.

#### **4. OVERVIEW AND SCRUTINY COMMITTEE**

**4.1** This report will be reviewed by the Overview and Scrutiny Committee at its meeting on 5 January 2026. The draft minutes of that meeting will be circulated to all Members and any recommendations from the Committee will be reported to Cabinet.

#### **5. FINANCIAL IMPLICATIONS**

**5.1** There are no direct financial implications from this report.

#### **6. LEGAL IMPLICATIONS**

**6.1** None specifically because of this report. However, a failure to meet statutory deadlines or standards in some services may expose the Council to legal challenge and/or financial liability.

#### **7. RISK ASSESSMENT**

**7.1** Contained in this report.

#### **8. EQUALITIES IMPACT**

**8.1** None

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

**9.1** Contained in this report.

#### **10. BACKGROUND PAPERS**

**10.1** None

(END)

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## Our Cotswolds, Our Plan: Action Plan 2025-28

Priorities	Sub-Priority	Action	Portfolio Holder	Accountable Officer(s)	Start date	End date		Q2 Update
Preparing for the Future	<b>Driving organisational and cultural change to be be fit for the future</b>	Transformation - Develop Strategy Action Plan	Cllr Mike Evemy Cllr Tristan Wilkinson	Helen Martin	Aug-25	Mar-28	On Target	Initial action plan drafted and working through a process of assessing and scoring to developed a prioritised list.
Preparing for the Future	<b>Driving organisational and cultural change to be be fit for the future</b>	Transformation through changing existing or creating new service delivery models, and/or making changes to the organisation structure, roles, processes or technology to improve outcomes, as a result of introducing new ways of working, and/or to reduce the costs of services.	Cllr Tristan Wilkinson	Helen Martin	Oct-25	Mar-28	On Target	Action plan includes potential restructures and reprocessing of services, increased use of digital solutions. Pipeline being prioritised on the basis of speed of delivery, cost and scalability.
Preparing for the Future	<b>Driving organisational and cultural change to be be fit for the future</b>	Digital Transformation: accelerating the use of digital technology to improve council services, enhance accessibility, and promote digital inclusion across communities.	Cllr Tristan Wilkinson	Helen Martin	Oct-25	Mar-28	On Target	Initial Action plan includes a number of AI initiatives. Meeting being set with Lead Members and Head of ICT to discuss feasibility and most appropriate route to maximise use on the basis of cost benefit ratio.
Preparing for the Future	<b>Preparing for Local Government Reorganisation</b>	Prepare the LGR submission to government. Prepare the next phase of the LGR Programme. Implement the government's decision.	Cllr Mike Evemy	Jane Portman	already commenced	Mar-28	On Target	Proposals for a one unitary authority and for a two unitary authority reorganisation have been prepared. They are due to be considered by Overview and Scrutiny Committee on 17th November and by Full Council on 26th November. Cabinet will take the final decision which proposal to support at their meeting on 26th November. The next phase of the LGR programme is being planned with a new programme and portfolio management approach. Workshop planned for 10th November to finalise details following workshops with officers in each work programme.
Preparing for the Future	<b>Preparing for Local Government Reorganisation</b>	Consult with other local authorities to inform possible options for establishing a Strategic Authority	Cllr Mike Evemy	Jane Portman	already commenced	Mar-28	On Target	Discussions have taken place with Gloucestershire Leaders, and they have agreed to consider three strategic options for devolution and establishing a strategic mayoral authority. These options will remain under consideration until the government has made a decision about local government reorganisation.
Preparing for the Future	<b>Developing our workforce</b>	Deliver the People and Culture Strategy	Cllr Mike Evemy	Angela Claridge	Sep-25	Mar-28	On Target	People & Culture Strategy, year 1 Implementation Plan, workforce values and supporting Communications & Engagement strategy agreed by Cabinet on 04.09.2025

Preparing for the Future	<b>Developing our workforce</b>	Deliver the Internal Communications Plan, to keep staff informed and engaged in organisational development and LGR	Cllr Mike Evemy	Matt Abbott	Sep-25	Mar-28	On Target	Working with colleagues across Glos principal councils, we have been issuing fortnightly communications about LGR proposals to all staff. These go onto the staff Portal, which also features a regularly updated page dedicated to LGR. We have also continued with our schedule of all staff briefings (once every six weeks), which include LGR updates, people and culture updates, and features like 'shout outs' for reward and recognition, which are a key aspect of the People & Culture Strategy. These sessions are also interactive. Through Q3, we will be rolling out visuals and content that will seek to further embed the council's values.
Preparing for the Future	<b>Developing our workforce</b>	Consideration of a small number of functions currently in Publica in light of their focus core function delivery	Cllr Mike Evemy	Jane Portman	Jul-25	Dec-25	On Target	Publica and the four shareholder councils have prioritised services currently delivered by Publica for review over the next few months. These reviews will consider how best to prepare the services for local government reorganisation.
Preparing for the Future	<b>Deliver the new Local Plan</b>	Adopt the new Local Plan, providing a robust development framework for the Cotswold area post 2028 that provides affordable housing, employment and infrastructure for present and future generations whilst conserving and enhancing the national landscape.	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Dec-27	On Target	Regulation 18 consultation currently being undertaken from 14 November -2nd January. Currently on target for submission in December 2026.
Delivering good services	<b>Ensure value for money and good standards</b>	Develop a Fleet Replacement programme	Cllr Andrea Pellegram	Peta Johnson	already commenced	Apr-26	On Target	Interim Cabinet meeting has been held to discuss options. Options are being progressed that consider replacement of the kerbside sort recycling fleet, and potentially refurbish other vehicles e.g. Refuse Collection Vehicles.
Delivering good services	<b>Ensure value for money and good standards</b>	Improve and digitise engagement with the customers of the Waste and Environment Services	Cllr Andrea Pellegram	Peta Johnson	already commenced	Mar-28	On Target	A review is in progress of the current systems and processes that provide residents with information about their collection services (e.g. Waste Wizard and collection day checker). The aim is to identify a range of areas for continuous improvement.
Delivering good services	<b>Ensure value for money and good standards</b>	Adapt to changes in Waste legislation	Cllr Andrea Pellegram	Peta Johnson	already commenced	Mar-28	On Target	Legislation and policy change continue to be tracked to understand the potential changes to waste arisings (tonnage and composition). This is strongly connected to the vehicle replacement programme both in terms of ensuring flexibility to cope with changes in the demand on services, and capacity to handle additional materials as we are required to collect them e.g. flexible plastics by the end of March 2027.

Delivering good services	Ensure value for money and good standards	Implement the Planning Advisory Service action plan	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Aug-26	On Target	The service has progressed a number of key actions from the PAS Action Plan. Notably, the Development Management Negotiation Protocol has been reviewed and updated, encompassing the targets to deal with speculative applications and ensure early refusals where no pre-application engagement has taken place. Process mapping across the service is largely complete and is now being used to support the implementation of Enterprise and to optimise IT systems for Enforcement. The review of the team structure and assessment of opportunities for additional administrative and technical support has also concluded. Job vacancies were advertised in late October, with further roles scheduled to be released in mid-November.
Delivering good services	Enhance financial resilience and make best use of our assets	Maintain financial sustainability over the MTFS-period (2026/27 to 2029/30) following the outcome of the Fair Funding 2.0 review.	Cllr Patrick Coleman	David Stanley	Apr-26	Mar-28	Not Scheduled to Start During Quarter	Not Due to Start this Quarter
Delivering good services	Play our part in maintaining and enhancing the public realm	Introduce charging to sustain Council owned public toilets.	Cllr Paul Hodgkinson	Claire Locke Sue Hughes	already commenced	Dec-25	On Target	Introduced at all facilities except Northleach. Doors have been upgraded at Northleach but charging mechanisms have not yet been installed pending decision from Northleach Town Council on future management and funding for these facilities. Decision expected by 1st December 2025.
Delivering good services	Play our part in maintaining and enhancing the public realm	Deliver the new Parking Strategy.	Cllr Paul Hodgkinson	Sue Hughes	already commenced	Mar-28	On Target	Draft Strategy is going to Cabinet in November for adoption. This includes a delivery action plan.
Delivering good services	Play our part in maintaining and enhancing the public realm	Invest in and maintain our car parks	Cllr Paul Hodgkinson	Alan Hope	already commenced	Mar-28	On Target	Capital investment works complete, maintenance ongoing. Collaboration between service areas to address issues as they arise.
Delivering good services	Deliver the new Local Plan	Ensure our planning policies deliver our corporate priorities and promote carbon neutral development and sustainable infrastructure for our communities	Cllr Juliet Layton	Geraldine LeCointe Jo Symons	already commenced	Dec-26	On Target	DM policies drafted and this along with strategic policies aim to ensure the Plan is green to the core. Draft Plan is on target for submission to the Planning Inspectorate by December 2026.
Responding to the climate emergency	Support and Enable Residents & Businesses	Expand the network of Electric Vehicle Charge Points	Cllr Mike McKeown	Olivia McGregor	already commenced	Mar-28	On Target	The network of EVCPs has been expanded to include West Street, Tetbury, Old Market Way in Moreton-in-marsh and Maugersbury Road in Stow-on-the-wold. There are 14 sockets available for use. A further 10 sockets are being installed in Brewery car park in Cirencester. A safety issue has emerged at the site which the suppliers are due to address before the sockets are safe to use.

<b>Responding to the climate emergency</b>	<b>Decarbonise Council Operations</b>	Embed climate action into council services to reduce the council's operational carbon emissions	Cllr Mike McKeown	Olivia McGregor	already commenced	Mar-28	<span style="background-color: green; color: white; padding: 2px;">On Target</span>	A Paper approved by Cabinet in July 2025 demonstrated that it is key to address emissions in the waste fleet and buildings to reduce council operational emissions. Cabinet approved the formation of a Climate Board to provide accountability for an emission reduction programme, support the Council with its objective of achieving its 2030 target and help guide future expenditure decisions. The Board is due to meet later this month for its inaugural meeting.
<b>Responding to the climate emergency</b>	<b>Increase resilience to the effects of climate change</b>	Work in partnership to respond to the Climate Risk and Vulnerability Assessment	Cllr Mike McKeown	Olivia McGregor	Oct-25	Mar-28	<span style="background-color: green; color: white; padding: 2px;">On Target</span>	CDC is working with Climate Leadership Gloucestershire to produce a Climate Risk and Vulnerability Assessment (CRVA). It is in the final stages of being drafted and is expected to be available at the end of the year. It will provide an evidence base to understand the key climate risks across the county, demonstrating the impact, likelihood and overall risk posed by climate change across a variety of climate hazards. In tandem to this, existing climate adaptation projects will be outlined, showcasing best practice and recommending future climate adaptation actions which will continue to bolster Gloucestershire's ability to respond to and withstand the impacts of climate change.
<b>Responding to the climate emergency</b>	<b>Deliver the new Local Plan</b>	Provide appropriate planning policies through our Plan review that support sustainable development and deliver high quality retrofit advice and support installation of renewables across the district through policy, partnership working and initiatives	Cllr Mike McKeown	Olivia McGregor	already commenced	Mar-28	<span style="background-color: green; color: white; padding: 2px;">On Target</span>	Retrofit engagement manager role has been extended for a further 11 months allowing CDC to continue to deliver high quality retrofit advice and support installation of renewables across the district through policy, partnership working and initiatives.
<b>Delivering Housing</b>	<b>Deliver the new Local Plan</b>	Allocate sites in line with Government requirements that will boost housing delivery whilst taking account of the significant constraints across the district	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Dec-26	<span style="background-color: green; color: white; padding: 2px;">On Target</span>	Regulation 18 consultation currently being undertaken from 14 November -2nd January on the draft Local Plan which will seek to allocate affordable housing sites; evidence is also being undertaken in this regard. Currently on target for submission in December 2026.
<b>Delivering Housing</b>	<b>Working with our partners to deliver more affordable homes</b>	Move forward a Pipeline of Rural Affordable Housing Sites and develop ways to increase Affordable Housing delivery	Cllr Juliet Layton	Alan Hope	already commenced	Mar-28	<span style="background-color: green; color: white; padding: 2px;">On Target</span>	Partnership working to deliver affordable housing ongoing. Rural Exception site Pipeline continues to be developed.
<b>Delivering Housing</b>	<b>Understanding everyone's housing needs</b>	Move forward a Pipeline of Rural Affordable Housing Sites and develop ways to increase Affordable Housing delivery	Cllr Juliet Layton	Jon Dearing Caroline Clissold	Sep-25	Mar-28	<span style="background-color: green; color: white; padding: 2px;">On Target</span>	CDC adopted the Preventing Homelessness Strategy for 2025-2030 in September 2025. An annual review will be carried out and measured against the actions, but will also be monitored regularly to ensure that all actions are on target.

Delivering Housing	<b>Understanding everyone's housing needs</b>	Continue to monitor housing needs to inform the councils revised Housing Strategy	Cllr Juliet Layton	Jon Dearing Caroline Clissold	already commenced	Mar-28	On Target	Quarterly reviews of H-CLIC data are being carried out to inform housing trends and monitor increases in contacts.
Delivering Housing	<b>Understanding everyone's housing needs</b>	Refocus the Housing Strategy on Strategic Actions.	Cllr Juliet Layton	Alan Hope	Aug-25	Oct-25	On Target	Housing Strategy document focused on Strategic action has been drafted and is at comments stage.
Supporting communities	<b>Strengthen our links with town and parish councils and key stakeholders</b>	Engage with and support town and parish councils to prepare for Local Government Reorganisation	Cllr Mike Evemy	Matt Abbott	Jun-25	Mar-28	On Target	Over 100 town & parish councillors/clerks attended a summit dedicated to LGR in June. Since then, we have started a newsletter for all clerks and councillors. The first of these was issued in August, covering other topics including, the Local Plan which has become another key topic on which we are engaging with and supporting TPCs. MA has also been reaching out to clerks to build relationships and ensure regular dialogue and a new/alternative channel for TP councils to engage with CDC. This provides mutual benefit to TPCs and CDC. There is a significant amount of activity planned in Q3 re: Local Plan engagement with TPCs.
Supporting communities	<b>Encourage community health and wellbeing</b>	Enable networking and public engagement events to help local residents to access support services	Cllr Claire Bloomer	Joseph Walker	already commenced	Mar-28	On Target	10 of 14 "Strengthening Local Communities" events have been successfully delivered, engaging over 600 residents with free activities, food, and support from key local partners. Events were tailored to each community, incorporating local priorities and feedback.
Supporting communities	<b>Encourage community health and wellbeing</b>	Celebrate the contribution of individuals and local groups	Cllr Claire Bloomer	Joseph Walker	already commenced	Mar-28	On Target	The last round of Unsung Heroes were presented to Council in July, where we introduced a new category for Young Heroes. The next round will be presented to Council in November
Supporting communities	<b>Encourage community health and wellbeing</b>	Promote community activity through CrowdFund Cotswold	Cllr Claire Bloomer	Joseph Walker	already commenced	Mar-28	On Target	The autumn round of CrowdFund Cotswold launched in July with an on-line workshop for prospective projects. The deadline was late September. 4 projects are seeking funding, with a further 3 undergoing verification checks
Supporting communities	<b>Encourage community health and wellbeing</b>	Ensure the leisure and culture contracts deliver core provision and positive community outcomes	Cllr Paul Hodgkinson	Joseph Walker	already commenced	Mar-28	On Target	The leisure contract continues to deliver strongly, exceeding targets for both membership and member visits. Museum visits are higher than last year, in part thanks to the successful Woolly Mammoth event in spring half term and Project Orpheus
Supporting communities	<b>Encourage community health and wellbeing</b>	Work with Cotswold Youth Network to champion contribution and needs of young people	Cllr Claire Bloomer	Joseph Walker	Oct-25	Mar-28	On Target	Council officers attend the youth network, and are supporting the delivery of the Holiday Activity and Food Programme which has recently been renewed for a further three years

Supporting communities	<b>Support our residents in crises</b>	Coordinate a partnership response to address financial hardship and the cost of living	Cllr Claire Bloomer	Joseph Walker	already commenced	Mar-28	On Target	The Cotswold Food Network (CFN) continues to coordinate efforts to improve food sustainability and resilience across the district. Its July Stakeholder Event provided policy and procedure updates including from DWP and the Council's Revenues and Benefits work including income maximisation campaigns
Supporting communities	<b>Support our residents in crises</b>	Work with the NHS Integrated Locality Partnership to improve the quality of life of children and vulnerable households	Cllr Claire Bloomer	Joseph Walker	already commenced	Mar-28	On Target	Officers continue to work in partnership through the ILP and its Children and Young People subgroup, now merged with GCC's One Plan Cotswolds group
Supporting communities	<b>Support our residents in crises</b>	Work with the Cotswold Community Safety Partnership to improve road safety and reduce antisocial behaviour	Cllr Paul Hodgkinson	Joseph Walker	already commenced	Mar-28	On Target	The CSP meeting in July reflected on road safety. Consequently the Neighbourhood policing team worked with Speed enforcement to set up a short film to promote community speedwatch filmed in September. This will be released imminently. Across Gloucestershire, there was a town centre focussed programme over the summer - Operation Shield, which was supported by community events in Cirencester.
Supporting communities	<b>Deliver the new Local Plan</b>	Through our Local Plan review aim to ensure that development provides the necessary infrastructure for communities and that this provision is aligned with the phasing and delivery of development	Cllr Juliet Layton	Geraldine LeCointe	already commenced	Mar-28	On Target	Regulation 18 consultation currently being undertaken from 14 November -2nd January on the draft Local Plan which will seek to allocate sites with appropriate provision of infrastructure; evidence is also being undertaken in this regard. Currently on target for submission in December 2026.
Supporting the economy	<b>Develop the skills of our residents</b>	Support key sectors to create new highly skilled jobs, including through promotion of apprenticeship opportunities.	Cllr Tristan Wilkinson	Joseph Walker Paul James	already commenced	Mar-28	On Target	Working with Cirencester Chamber of Commerce, through a UK Shared Prosperity Funded programme, to enhance opportunities for young people, including promoting apprenticeships.
Supporting the economy	<b>Grow a strong and sustainable economy</b>	Deliver a programme of activities through the Shared Prosperity and Rural England Prosperity Funds	Cllr Tristan Wilkinson	Joseph Walker Paul James	Mar-25	Mar-26	On Target	All UKSPF and REPF funds are now allocated and projects are progressing.
Supporting the economy	<b>Grow a strong and sustainable economy</b>	Deliver the actions set out in the refreshed Green Economic Growth Strategy.	Cllr Tristan Wilkinson	Joseph Walker Paul James	Jan-25	Mar-28	On Target	The Green Economic Growth Strategy is overseen by the Cotswold Economic Advisory Group. The refreshed strategy was adopted by Cabinet in March 2025 and delivery of the actions is underway.

<b>Supporting the economy</b>	<b>Grow a strong and sustainable economy</b>	Work with the Royal Agricultural University on their aspiration for the Innovation Village	Cllr Tristan Wilkinson	Joseph Walker Paul James	already commenced	Mar-28	On Target	A planning application was submitted in April 2024. It is hoped it will be determined in the next few months. The Council continues to support the RAU in other aspects of this project in parallel with the application being considered.
<b>Supporting the economy</b>	<b>Grow a strong and sustainable economy</b>	Promote the Growth Hub to support existing businesses and encourage the growth of start-ups	Cllr Tristan Wilkinson	Joseph Walker Paul James	already commenced	Mar-28	On Target	The Growth Hub is funded for 2025-26 via UKSPF and provides support to start-up and growing businesses. Officers work closely with the team at the Growth Hub and hold regular monitoring meetings. Cirencester Growth Hub is the best-performing Growth Hub in the county.
<b>Supporting the economy</b>	<b>Grow a strong and sustainable economy</b>	Work with partners to realise benefits of the Creative Cotswolds Action Plan	Cllr Paul Hodgkinson	Joseph Walker	Sep-25	Mar-28	On Target	This work will be facilitated by the appointment of a Leisure and Culture Support Officer. This post has now been approved and should be recruited to in q3
<b>Supporting the economy</b>	<b>Manage the opportunity and impact of the visitor economy</b>	Refresh the Tourism Destination Management Plan	Cllr Paul Hodgkinson	Joseph Walker Chris Jackson	Sep-25	Sep-26	On Target	The tourism team has worked hard with partner Gloucestershire authorities to prepare a bid for Strategic Economic Development Fund support to deliver a renewed DMP. This was submitted in the summer, and is working through the approval process with a decision due in November
<b>Supporting the Economy</b>	<b>Deliver the new Local Plan</b>	Promote policies that maintains and protects our existing employment sites whilst supporting sustainable economic growth in the district	Cllr Juliet Layton	Geraldine LeCoite	already commenced	Dec-26	On Target	Regulation 18 consultation currently being undertaken from 14 November -2nd January on the draft Local Plan which will seek to protect our existing employment sites and support sustainable economic growth; evidence is also being undertaken in this regard. Currently on target for submission in December 2026.

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# COTSWOLD

## District Council

**COUNCIL PRIORITIES REPORT**  
**July – September 2025**

# Our Purpose, visions, priorities and values

Cotswold District Council serves one of the UK's most iconic areas, home to 90,000 residents across more than 100 communities and parishes. We work to protect its unique character, support its economy, and improve lives.

## Our Purpose

We provide high-quality services that meet community needs—from planning and housing to climate action and wellbeing. As local government faces significant change, we remain focused on delivering with **purpose, integrity, and ambition**. This strategy sets out our vision to **2028**, when national plans for Local Government Reorganisation are expected to create a new unitary council, and includes an action plan to leave a lasting legacy.

## Our Vision

To leave a legacy of:

- Affordable, sustainable housing
- Resilient, connected communities
- A thriving local economy
- A protected natural environment
- Transparent, high-quality public services

## Our Values

Everything we do is built on trust, transparency, and listening to our communities. We:

- **Put communities first** – their priorities are our priorities
- **Work as one team** – for residents and businesses
- **Focus on efficiency and value** – ensuring good use of resources
- **Set up for success** – to deliver against our corporate priorities

## Our strategic priorities

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

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



# Preparing for the Future

## The Context

Gloucestershire is set to move to a unitary structure in 2028, with Cotswold District Council services transferring to a successor authority. Our focus remains on ensuring a smooth transition while continuing to meet residents' needs. We are driving organisational change, developing our workforce, and progressing a new Local Plan. Engagement with town and parish councils and collaboration with partner authorities is underway to design future services and ensure decisions reflect local priorities.

## Actions we are taking

In 2025, the Council launched an ambitious transformation programme to modernise services, strengthen digital capabilities, and prepare for future governance changes. This programme reflects our commitment to delivering high-quality, accessible services that meet residents' evolving needs while safeguarding financial sustainability and operational resilience. Against a backdrop of increasing demand, technological advancement, and national policy shifts, our strategic approach aims to create a more agile, efficient, and customer-focused organisation.

The transformation programme is structured around a clear vision: improving outcomes for residents, enhancing organisational culture, and ensuring readiness for potential structural changes in local government. An initial Strategy Action Plan has been drafted and is undergoing a rigorous assessment and scoring process to develop a prioritised pipeline of initiatives based on speed of delivery, cost, and scalability. The plan includes proposals for service redesign, potential restructures, and greater integration of digital solutions. Digital transformation is a cornerstone of this strategy, with several AI initiatives included to accelerate digital adoption, improve service accessibility, and promote digital inclusion. Meetings are being scheduled with Lead Members and the Head of ICT to evaluate feasibility and identify the most cost-effective implementation routes through detailed cost-benefit analysis.

In parallel, the Council is actively engaged in the Local Government Reorganisation (LGR) process. Proposals for both a single-unitary authority and a two-unitary authority model have been developed and were considered by the Overview and Scrutiny Committee on 17 November and Full Council on 26 November, with Cabinet making the final decision on which proposal to support. Planning for the next phase of the LGR programme is underway, using a new programme and portfolio management approach. A workshop held on 10 November finalised details following officer engagement sessions.

Discussions with Gloucestershire Leaders have also progressed, with agreement to consider three strategic options for devolution and establishing a strategic mayoral authority. These options will remain under consideration until the government confirms its decision on local government reorganisation.

The People and Culture Strategy has made significant progress. In September 2025, Cabinet approved the Year 1 Implementation Plan, workforce values, and a supporting Communications and Engagement Strategy. Internal communications remain a priority, with fortnightly updates on LGR proposals issued to all staff via the staff portal, which also hosts a dedicated LGR page. Regular all-staff briefings continue every six weeks, providing updates on LGR, organisational development, and recognition initiatives. Through Quarter 3, we will roll out new visuals and content to further embed the Council's values. In addition, Publica and the four shareholder councils have prioritised reviews of services currently delivered by Publica to ensure alignment with future governance arrangements.

Looking ahead, the Council is preparing to adopt a new Local Plan, which will provide a development framework for the Cotswold area post-2028. This plan will deliver affordable housing, employment opportunities, and infrastructure for current and future generations, while conserving and enhancing the district's nationally significant landscape.

# Delivering Good Services



## The Context

The Council is committed to providing high-quality services that offer value for money, tackle climate change, and meet community needs. We've strengthened accountability by bringing key services in-house, advanced a Local Plan update to deliver sustainable growth, and earned positive feedback from the LGA for our progress. Current priorities include modernising waste services, improving digital engagement, preparing for legislative changes, and implementing strategies for parking, financial resilience, and income generation. These actions ensure services remain responsive, sustainable, and future-ready.

## Actions we are taking

The council is driving forward a series of strategic projects to modernise waste, environmental, and infrastructure services, aligning them with its broader transformation and climate commitments. A major focus is the development of a fleet replacement programme, which not only addresses the ageing kerbside recycling fleet but also explores refurbishment options for other vehicles to reduce costs and environmental impact. This initiative is closely linked to the council's ambition to transition towards ultra-low emission and hybrid technologies, supporting its pledge to achieve net-zero carbon emissions and reduce transport-related emissions, which account for a significant proportion of the district's carbon footprint.

Customer engagement is another priority, with work underway to improve and digitise the way residents interact with waste and environmental services. Current systems, such as the Waste Wizard and collection day checker, are being reviewed to identify opportunities for continuous improvement. The aim is to deliver a more intuitive, accessible experience that provides real-time information and supports digital inclusion across the district.

The council is also preparing for significant changes in national waste legislation. Monitoring and analysis of policy developments are ongoing to ensure services remain flexible and capable of adapting to new requirements, such as the collection of additional materials like flexible plastics. These changes are strongly connected to the fleet strategy to ensure vehicles can accommodate future demands and maintain service resilience.

In planning, the council is implementing recommendations from the Planning Advisory Service peer review, which highlighted strengths in collaborative working and identified areas for improvement. The resulting action plan focuses on enhancing enforcement processes, reducing administrative burdens, and exploring the use of AI tools to improve efficiency in reporting and correspondence. These measures aim to create a more responsive and streamlined planning service that supports sustainable development and carbon-neutral growth.

Parking services are also undergoing transformation. A new parking strategy is being developed to reflect changing travel patterns, climate priorities, and future demand. This includes reviewing car park usage, improving accessibility, and expanding electric vehicle charging infrastructure. Investment in car parks has already delivered significant improvements, and ongoing collaboration between service areas will ensure these assets continue to meet community needs.

Looking ahead, the council is progressing a full update of its Local Plan to respond to increased housing targets and embed climate and biodiversity considerations at the heart of development policy. This update will provide a robust framework for delivering affordable housing, sustainable infrastructure, and carbon-neutral communities, while safeguarding the district's nationally significant landscape.

# Responding to the Climate Emergency



## The Context

The climate and ecological crises pose serious threats, especially to younger and future generations. Cotswold District Council declared a climate emergency in 2019 and adopted its Climate Emergency Strategy (2020–2030), setting ambitious targets: an 80% reduction in emissions by 2030 and net zero by 2045 without reliance on carbon offsetting. The Council has embedded climate considerations across all policies and decision-making and is committed to achieving 100% clean energy use across its operations by 2030.

## Actions we are taking

The Council has made significant progress in reducing operational carbon emissions, achieving a 41% reduction since 1990, from 4.7 million kg CO<sub>2</sub>e to 2.76 million kg CO<sub>2</sub>e by 2022–23. A Climate Board has been established to monitor and accelerate progress, using independent assessments like the Climate Action Scorecards to identify areas for improvement. Key initiatives include:

- Energy efficiency and renewable energy: A Renewable Energy Study (2025) provides evidence-based recommendations for deploying solar and wind energy and informs the Local Plan update to make it "Green to the Core." This study also forms the foundation for Local Area Energy Planning, ensuring grid capacity and flexibility for future renewable integration.
- Solar and retrofit schemes: The Cotswold Home Solar scheme has helped 27 homes install solar panels, with 18 more in progress, delivering projected savings of nearly £450,000. A Gloucestershire-wide retrofit support service, launched in January 2025, offers tailored energy efficiency plans and vetted installers. Locally, a Retrofit Engagement Officer is running events and advice sessions, including the "Drive and Thrive" event held in March.
- EV infrastructure: The Council has installed 24 new EV chargers in car parks across Stow-on-the-Wold, Moreton-in-Marsh, Tetbury, and Cirencester, bringing the total to 49 Council-installed chargers out of 150 publicly accessible points in the district. This rollout supports residents without off-street parking and aligns with the ambition for an EV charger within a 10-minute walk wherever possible.
- Transport decarbonisation: A dedicated Transport Decarbonisation Study sets out pathways and interventions to reduce emissions from the district's largest source of carbon, including active travel infrastructure and EV adoption.
- Local Plan update: Work is underway to embed climate and biodiversity considerations into the Local Plan, ensuring sustainable development, affordable housing, and carbon-neutral communities.

Community engagement remains central to the Council's approach, with carbon literacy training, campaigns promoting behaviour change, and initiatives like CrowdFund Cotswolds to support local climate projects. Partnerships with housing providers such as Bromford are strengthening climate resilience in affordable housing.

# Delivering Housing



## The Context

Cotswold faces a severe housing affordability crisis, with property prices far exceeding local incomes and a shortage of genuinely affordable homes. Many residents, especially younger people, are forced to leave the area, threatening community resilience. The council is committed to delivering good-quality, affordable housing—prioritising social rent and homes for young people, families, and veterans. New homes will be energy-efficient and carbon-neutral to reduce costs and support sustainability. Tackling homelessness and ensuring long-term housing solutions are central to our strategy because secure housing underpins health, wellbeing, and strong communities.

## Actions we are taking

Meeting sharply increased government housing targets while preserving the Cotswolds' unique character and environment is one of the council's most significant challenges. National policy now requires the district to plan for more than 18,000 new homes by 2043—over double previous targets—despite 80% of the area being designated as National Landscape, which severely limits development options. In response, the council is undertaking a rapid update of its Local Plan, exploring strategic options such as a new settlement near Driffield, extensions to existing towns and villages, and smaller developments distributed across the district. Public consultation is underway to ensure that decisions reflect local priorities and community input.

Alongside meeting these targets, the council remains committed to delivering genuinely affordable housing. Land scarcity and high property prices—often more than 16 times average rural incomes—make this a complex task, but innovative solutions are being pursued. A pipeline of rural exception sites is being developed, supported by strong partnerships with housing associations and parish councils. Recent schemes, such as the Avening development opened by HRH The Princess Royal, demonstrate how high-quality, environmentally sustainable homes can be delivered in rural settings. These homes incorporate features like air-source heat pumps, solar panels, and traditional Cotswold design, ensuring they complement village character while reducing energy costs for residents.

The council's Housing Strategy sets out clear priorities: planning for everyone's housing needs, increasing affordable housing supply, and creating sustainable, climate-resilient homes. This includes addressing poor-quality housing and supporting community-led housing initiatives. The strategy recognises that there is no single solution; instead, a combination of measures—large-scale developments, rural schemes, and incremental improvements—will collectively deliver meaningful change.

Preventing homelessness is another cornerstone of the council's approach. The Preventing Homelessness Strategy 2025–2030 focuses on early intervention, partnership working, and tailored support for vulnerable residents. The council already prevents over 200 households a year from becoming homeless through proactive measures such as negotiating with landlords, providing emergency accommodation, and offering financial assistance. Rough sleeping remains extremely low in the district thanks to assertive outreach and rapid response protocols. Quarterly reviews of H-CLIC data help monitor trends and inform strategic actions, ensuring resources are targeted effectively.

Looking ahead, the council will continue to balance housing delivery with environmental stewardship. Biodiversity enhancements, green infrastructure, and carbon-neutral design principles are being embedded into planning policies. The updated Local Plan will not only allocate sites for housing but also set a framework for sustainable growth, ensuring that new development supports thriving communities without compromising the Cotswolds' nationally significant landscape.



# Supporting Communities

## The Context

Cotswold District benefits from strong health outcomes, low crime, and natural beauty. However, challenges remain, particularly for an ageing population in rural areas facing loneliness and limited access to services. Broader issues such as unemployment, low income, poor housing, and lifestyle choices also impact wellbeing. Addressing these requires a collaborative, whole-systems approach using asset-based community development.

## Actions We Are Taking

Cotswold District Council is working to position the district as a national leader in health and wellbeing, promoting active lifestyles and inclusive community initiatives. The Leisure Strategy, shaped around local priorities, guides investment in facilities and non-facility interventions, overseen by the Active Cotswolds Programme Board across three themes: Healthier District, Connected Community, and Active Environment. The leisure contract continues to exceed targets, with cultural engagement boosted by events like the Woolly Mammoth exhibition and Project Orpheus.

The Holiday Activity and Food (HAF) programme has been renewed for three years, providing activities and meals through providers such as World Jungle. Summer HAF 2025 received positive feedback, and planning is underway for future delivery. World Jungle also supports youth-focused events like the Cotswold Youth Mobile Festival, promoting creativity and wellbeing.

To complement HAF, the Council secured £50,000 for 14 Strengthening Local Communities events. Ten events have already engaged over 600 residents with free activities and partner support. Upcoming events in Northleach (Oct 28) and Avening (Oct 30) will feature Halloween themes, with final events in Mickleton and Kemble scheduled for February.

Partnership working remains central, with collaboration from the NHS, Citizens Advice, Severn Wye, Foodbanks, and Carers Hub on issues such as cost of living, health, and social isolation. Officers also work through the Integrated Locality Partnership and GCC's One Plan Cotswolds group to improve outcomes for children and vulnerable households.

The Cotswold Food Network (CFN) drives food sustainability through initiatives like the Food Procurement Guide, Allotments Mini Guide, and Cookery Classes Guide. Outreach includes the Low-Income Family Tracker and a revised "Worrying About Money?" leaflet (4,000 copies distributed). A Venison Supply Project is being scoped to support food charities and manage deer overpopulation.

Youth engagement remains a priority, with support for Northleach Teen Space, digital skills courses, and summer programmes. The Unsung Heroes awards introduced a Young Heroes category in July, with the next round due in November.

The Council promotes community-led initiatives through CrowdFund Cotswold, which has supported over £1 million in local projects. The autumn round attracted projects such as community sheds, skateparks, and murals, including the Churn Project's Community Shed tackling isolation.

Work is ongoing with town and parish councils to prepare for Local Government Reorganisation, while the Local Plan Review responds to housing targets now set at 1,036 homes per year. A Preferred Options Consultation runs from 5 November to 18 December 2025, seeking feedback on development and infrastructure needs.

Finally, the Council works with the Community Safety Partnership to improve road safety and reduce antisocial behaviour. A community speedwatch film is due for release, and the district supported Operation Shield, a summer town-centre safety initiative.



# Supporting the Economy

## The Context

The Cotswold economy is diverse, with businesses of all sizes across multiple sectors. While tourism remains a major employer, the district's economic potential goes far beyond visitor activity. Our focus is on creating a resilient, balanced economy by supporting innovation, enhancing digital capability, and promoting green growth. Through targeted investment and partnership working, we aim to nurture high-value, low-impact sectors such as agritech, cyber, medical technology, and environmental innovation—providing better opportunities for local people and businesses.

## Actions we are taking

The Green Economic Growth Strategy 2025–29 guides economic development activity and is overseen by the Cotswold Economic Advisory Group, which includes key partners such as St James's Place, Cirencester College, and the Royal Agricultural University (RAU). The refreshed strategy focuses on creating high-value, low-impact jobs, supporting sustainable growth, and promoting skills development, including apprenticeships and T-Levels.

Through the UK Shared Prosperity Fund (UKSPF), the Council has delivered projects such as business support via the Growth Hub, heritage restorations, and the rebranding of the Cotswold Water Park area as the Cotswold Lakes. Outreach has expanded to towns like Moreton-in-Marsh, and recent rounds have funded initiatives including mentoring for young people, creative co-working spaces, and town centre improvements. Nine projects received over £120,000 in 2025, including £25,000 for Cirencester Chamber of Commerce to support early careers. Additional funding from the Rural England Prosperity Fund (REPF) has supported rural business grants, village hall upgrades, and active travel schemes. Projects funded from 2022–25 are complete, with 2025–26 allocations now underway, including energy efficiency measures, solar panels, and community facility improvements.

Town centres remain a priority. Cirencester's vacancy rate has fallen to 4.8% with refurbished units and new social enterprises such as The Old Department Store occupying former retail spaces. Smaller towns maintain low vacancy rates, though conversions to residential use and loss of critical mass remain concerns. A UKSPF-funded consultant is investigating higher vacancy areas like Lechlade, Moreton-in-Marsh and Tetbury to develop action plans.

The Council is working with partners to grow sectors such as agritech, cyber, and medical tech. Key projects include:

- RAU Innovation Village – £140M scheme, planning application submitted.
- ZeroAvia at Cotswold Airport – advancing hydrogen-electric aviation.
- Fire Service College – expanding as a Centre for National Resilience.
- A417 Missing Link – £460M infrastructure project improving connectivity.

The Growth Hub, funded through UKSPF, continues to provide expert business support and has launched the Cotswold Catalyst incubator programme for high-potential start-ups. This six-month initiative offers tailored workshops, co-working space, and access to thought leaders, helping businesses scale and thrive. Cirencester Growth Hub remains the best-performing hub in Gloucestershire.

Cultural development is supported through the Creative Cotswolds Action Plan, approved in July 2025, which aims to strengthen the district's cultural sector. Delivery will be driven by a new Leisure and Culture Support Officer, with recruitment scheduled for Q3 2025–2026 and the post expected to be filled shortly.



**COTSWOLD**  
District Council

Delivering great services locally

PERFORMANCE REPORT:

**July - September 2025**

# Summary Index

Area	KPI Name	RAG	Page
Revenues, Benefits and Housing	<a href="#"><u>Percentage of Council Tax Collected</u></a>		7
	<a href="#"><u>Percentage of Non-Domestic Rates collected</u></a>		8
	<a href="#"><u>Processing times for Council Tax Support new claims</u></a>		9
	<a href="#"><u>Processing times for Council Tax Support Change Events</u></a>		10
	<a href="#"><u>Processing times for Housing Benefit Change of Circumstances</u></a>		11
	<a href="#"><u>Percentage of Housing Benefit overpayment due to LA error/admin delay</u></a>		12
	<a href="#"><u>(Snapshot) Long Term Empty Properties</u></a>		13
	<a href="#"><u>(Snapshot) Number of households in B&amp;B/hotel-type accommodation &amp; Hostels (LA owned or managed); and Number of successful 'Move On' into suitable independent/long-term accommodation from B&amp;Bs/hotels/hostels</u></a>		14
Customer Experience	<a href="#"><u>Customer Satisfaction - Telephone</u></a>		15
	<a href="#"><u>Customer Satisfaction - Email</u></a>		16
	<a href="#"><u>Customer Satisfaction - Face to Face</u></a>		17

# Summary Index

Area	KPI Name	RAG	Page
Customer Experience	<a href="#">Customer Call Handling - Average Waiting Time</a>		18
	<a href="#">Complaints</a>		20
	<a href="#">Percentage of FOI requests answered within 20 days</a>		21
Development Management and Land Charges	<a href="#">Building Control Satisfaction</a>	No Data	22
	<a href="#">Percentage of major planning applications determined within agreed timescales (including AEOT)</a>		23
	<a href="#">Percentage of minor planning applications determined within agreed timescales (including AEOT)</a>		24
	<a href="#">Percentage of other planning applications determined within agreed timescales (including AEOT)</a>		25
	<a href="#">Total Income achieved in Planning &amp; Income from Pre-application advice</a>		26
	<a href="#">Percentage of Planning Appeals Allowed</a>		27
	<a href="#">(Snapshot) Planning Enforcement Cases</a>		28
	<a href="#">Percentage of official land charge searches completed within 10 days</a>		29
	<a href="#">Number of affordable homes delivered</a>		30

# Summary Index

Area	KPI Name	RAG	Page
Waste and Environment	<a href="#"><u>Number of fly tips collected and percentage that result in an enforcement action</u></a>		31
	<a href="#"><u>Percentage of high-risk food premises inspected within target timescales</u></a>		32
	<a href="#"><u>% High risk notifications risk assessed within 1 working day</u></a>		33
	<a href="#"><u>Percentage of household waste recycled</u></a>		34
	<a href="#"><u>Residual Household Waste per Household (kg)</u></a>		35
	<a href="#"><u>Missed bins per 100,000</u></a>		36
Leisure	<a href="#"><u>Number of visits to the leisure centres &amp; (Snapshot) Number of gym memberships</u></a>		37

# A note on performance benchmarking

Benchmarking can be a useful tool for driving improvement; by comparing our performance with other similar organisations, we can start a discussion about what good performance might look like, and why there might be variations, as well as learning from other organisations about how they operate (process benchmarking). When we embark on performance benchmarking, it is important to understand that we are often looking at one aspect of performance i.e. the level of performance achieved. It does not take into account how services are resourced or compare in terms of quality or level of service delivered, for example, how satisfied are residents and customers? Furthermore, each council is unique with its own vision, aim and priorities, and services operate within this context.

Benchmarking has been included wherever possible ranking against Chartered Institute of Public Finance and Accountancy (CIPFA) Nearest Neighbours model which uses a range of demographic and socio-economic indicators to identify the local authorities most similar to our own. Cotswold's identified Nearest Neighbours are Babergh, Chichester, Derbyshire Dales, East Hampshire, Lichfield, Maldon, Malvern Hills, Mid Devon, South Hams, Stratford-on-Avon, Stroud, Tewkesbury, West Devon, West Oxfordshire and Wychavon. Additional investigations are underway to provide it for those metrics that are missing comparisons.

A RAG (red, amber, green) status has been applied to each KPI to provide a quick visual summary of the status of that KPI for the quarter. Additionally, RAG status has been added to the direction of travel for each metric to show how the performance against last quarter and the same quarter compared to last year is progressing.

## A note on Standard Deviation

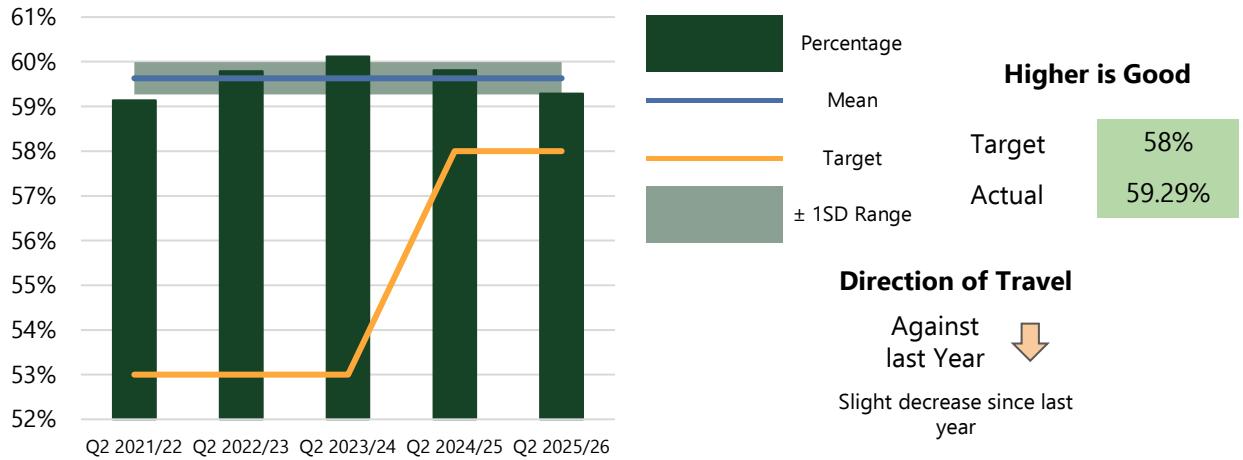
Standard deviation is included in this report to provide insight into the consistency of performance, not just the average results. While averages show overall trends, standard deviation highlights how much variation exists around those averages. A low standard deviation suggests performance is stable and predictable, whereas a high standard deviation indicates inconsistency, which may warrant further investigation. This helps identify areas where performance may be less reliable, supporting more informed decision-making and targeted improvements. We have used 1 standard deviation in this report to help understand variation in performance and to monitor consistency over time. This approach highlights typical fluctuations around the average, allowing us to identify patterns and potential areas of concern without focusing solely on extreme outliers.

# Overall Performance

Overall, the Council's performance shows strong progress in key areas, alongside some ongoing challenges. Council Tax collection is ahead of expectations, and Non-Domestic Rates continue to improve year on year. Planning determination times for major and other applications remain above target, and customer satisfaction is exceptionally high. Leisure services also performed well, with sustained engagement in gym memberships and leisure centre visits. However, processing times for Council Tax Support and Housing Benefit change events, while improving, remain above target due to cumulative averages and operational complexities linked to Universal Credit migration. Land Charges performance was affected by staffing pressures late in the quarter, and environmental performance faces challenges, with household recycling rates impacted by seasonal factors and wider national trends.

The Council remains committed to further improving its performance and service delivery and actively investing in the development and implementation of automation and self-serve options for customers. By providing accessible and efficient self-help tools, customers can address their queries and concerns independently, leading to a decrease in the need for repeated interactions with services. It will continue to monitor and assess the impact of improvement programs in reducing customer contact and enhancing operational efficiency.

# Percentage of Council Tax Collected

[INDEX](#)


Page 187

## How do we compare?

Benchmarking via Gov.uk Tables and Individual Council Websites using CIPFA Nearest Neighbours – Latest dataset is 2024-25 Collection Rates

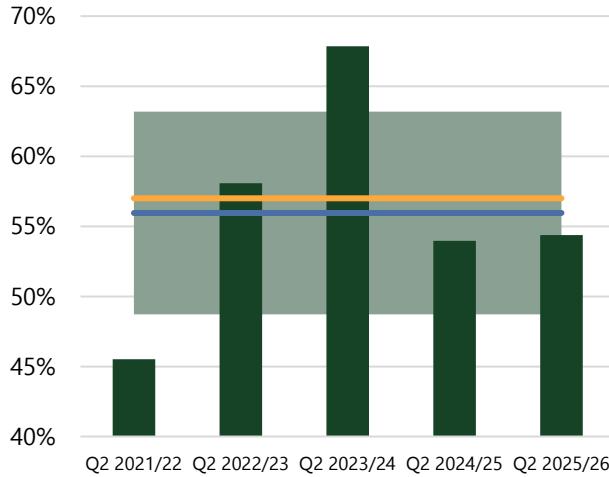
2024-25 Benchmark	%	CIPFA Rank	Quartile
Babergh	99.12	1/16	Top
Tewkesbury	98.53	4/16	Top
<b>Cotswold</b>	<b>98.3</b>	<b>7/16</b>	<b>Second</b>
Maldon	97.95	12/16	Third
Chichester	97.47	16/16	Bottom

The council exceeded its 58% target this quarter, though performance was slightly lower than the same period last year (by around 0.5%). However, it remains nearly 1% above pre-pandemic levels. A growing trend of residents spreading payments over 12 months is influencing early-year patterns, but overall collection rates remain stable.

The table below shows council tax collection rates for previous years alongside the outstanding balances.

	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	Total Outstanding
Quarter End	£438,453.87	£588,952.23	£648,467.93	£861,243.80	£1,240,601.13	£3,777,718.96
% collected	99.50%	99.36%	99.33%	99.17%	98.86%	

# Percentage of Non-domestic rates collected



Percentage

Mean

Target

± 1SD Range

Target  
Actual

**Higher is Good**

57%  
54.37%

**Direction of Travel**

Against last  
Year



Slight increase since last  
year

## How do we compare?

Benchmarking via Gov.uk Tables and Individual Council Websites using CIPFA Nearest Neighbours - Latest dataset is 2024-25 Collection Rates

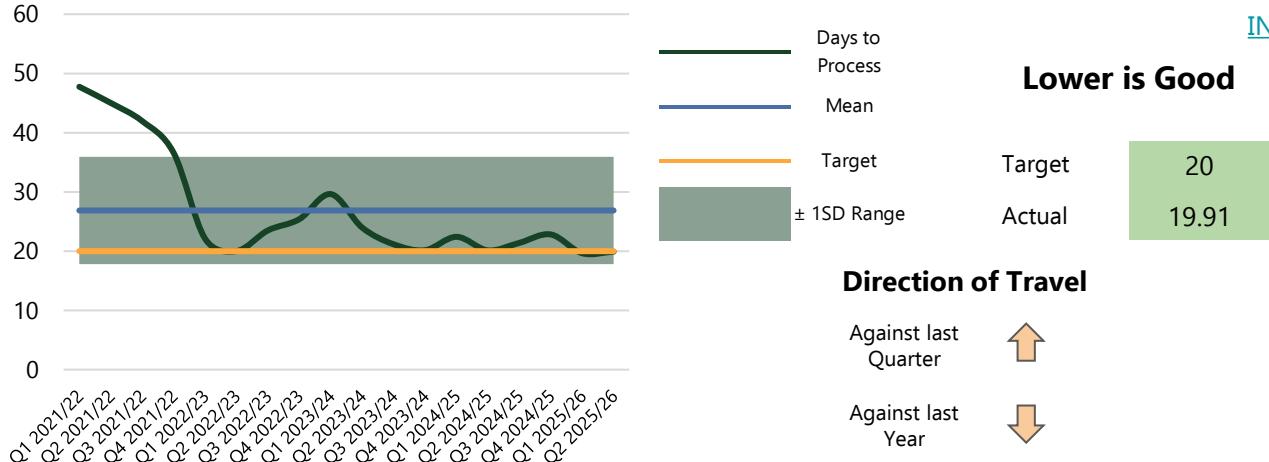
2024-25 Benchmark	%	CIPFA Rank	Quartile
Mid Devon	99.83	1/16	Top
South Hams	98.3	7/16	Second
Malvern Hills	97.59	11/16	Third
<b>Cotswold</b>	<b>96.91</b>	<b>14/16</b>	<b>Bottom</b>
Stratford-on-Avon	96.46	16/16	Bottom

Cotswold fell just short of its 57% target but improved 0.41% year-on-year. The current target may be inflated due to historical anomalies, making the year-on-year gain a more meaningful measure of progress. Recovery work is up to date across all councils. Early staff training has enabled flexible working across Council Tax and NDR, helping reduce outstanding item age and boost resilience.

The table below displays the percentage of Non-Domestic Rates collected in respect of previous years, along with the outstanding amount:

	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	Total Outstanding
<b>Balance at Quarter End</b>	£91,069.95	£203,470.67	£255,890.60	£196,767.74	£418,438.93	£1,165,637.89
<b>% collected</b>	99.36%	99.26%	99.17%	99.30%	98.21%	

# Processing times for Council Tax Support new claims



**Lower is Good**

**Direction of Travel**

Against last Quarter



Against last Year



Slightly increased since last quarter but slightly decreased since last year

## How do we compare?

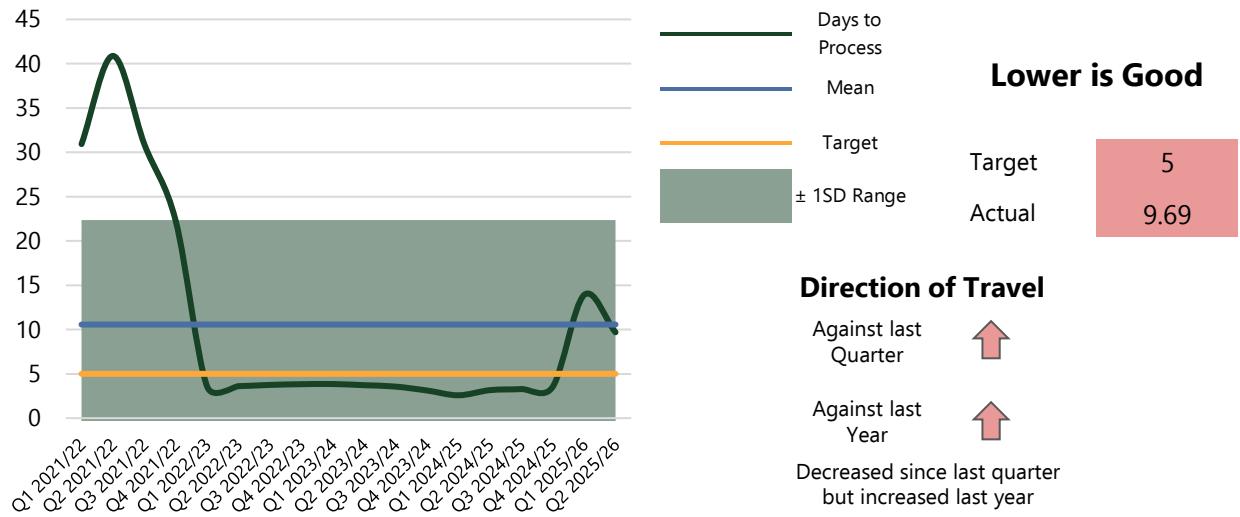
Gov.uk produces tables to show a snapshot of the number of CTS claimants at the end of each financial year. The below table shows number of claimants at the end of June 2025 and the percentage change from June 2024 for each authority.

Q1 2025-26 Benchmark	Number of Claimants at end of June 2025	Percentage Change since June 2024
Maldon	2,983	-3.21%
<b>Cotswold</b>	<b>3,807</b>	<b>-3.06%</b>
East Hampshire	4,897	-0.39%
Tewkesbury	4,918	1.13%

Processing times rose slightly this quarter, by 0.26 days, likely due to a 45% increase in applications between Q1 and Q2, but the 20-day target was still met. Performance remains consistent, reflecting strong operational focus.

The council continues to utilise the Low Income Family Tracker (LIFT) to support targeted outreach. Campaigns this quarter included promoting Council Tax Support and raising awareness of water tariff schemes, helping financially vulnerable households access additional support.

# Processing times for Council Tax Support Change Events



During Q2, Cotswold recorded a cumulative average of 9.69 days for processing Council Tax Support Change of Events, a reduction of 4.21 days compared to Q1. This improvement reflects the full impact of automation enhancements and backlog clearance earlier in the year.

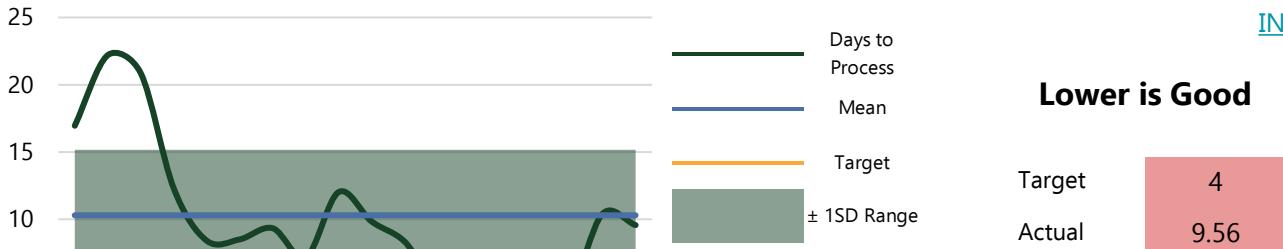
Around 85% of income-related changes were batch processed, contributing to faster turnaround times. Cotswold's monthly average from July to September was 3.45 days, within the 5-day target

Although the metric remains cumulative, processing times have been steadily reducing by around 0.2 days per week. With automation now maximised and workflows streamlined, further acceleration is limited.

How do we compare?

Benchmarking currently not available. The Data & Performance Team will investigate options.

# Processing times for Housing Benefit Change of Circumstances



## Direction of Travel

Against last Quarter



Against last Year



Decreased since last quarter  
but increased since last year

Page 191

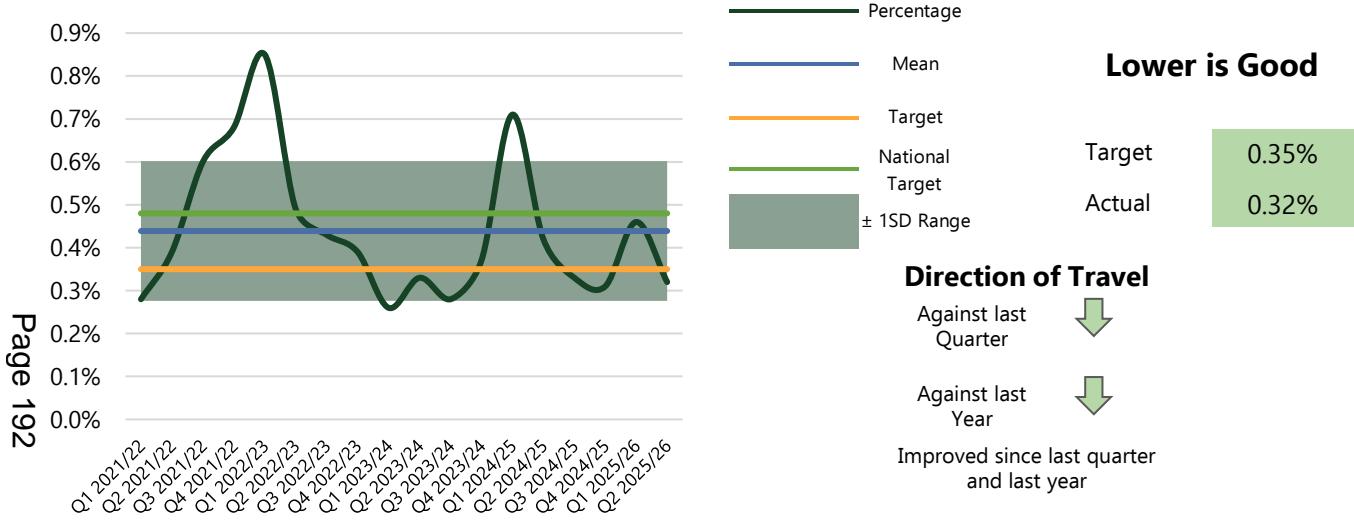
### How do we compare?

Speed of processing for HB CoCs – LG Inform. Latest dataset is January - March '25 (Q4 2024-25)

Q4 2024-25 Benchmark	Days	CIPFA Nearest Neighbours Rank	Quartile
Lichfield	1.49	1/16	Top
Mid Devon	1.81	3/16	Top
South Hams	2.19	7/16	Second
West Devon	2.47	11/16	Third
<b>Cotswold</b>	<b>3.27</b>	<b>13/16</b>	<b>Bottom</b>
West Oxfordshire	4.3	16/16	Bottom

In Q2, cumulative processing times for Housing Benefit Change Events in Cotswold improved but remained above the 4-day target. Housing Benefit remains a pressure point, with the team prioritising Full Claim Reviews mandated by the DWP. Delays in receiving full evidence and the 30-day open case rule can distort performance metrics. Caseloads now mainly consists of pension-age claimants and temporary accommodation cases. While pensioner claims are generally stable, the small volume means any delay can disproportionately affect processing times. Older claims are being flagged for review, particularly where capital may have changed. A bulk issue of Full Claim Reviews is expected soon, likely increasing activity. Most HB changes are anticipated around Christmas and into Q4.

# Percentage of Housing Benefit overpayment due to LA error/admin delay

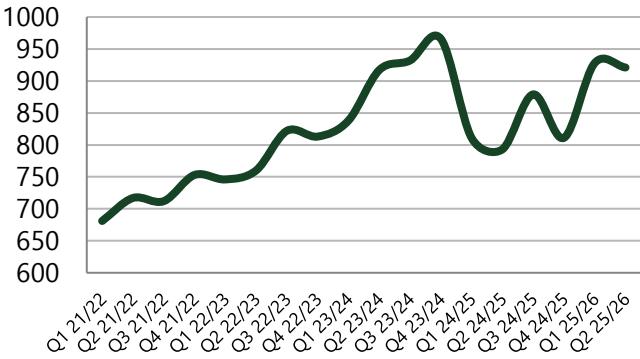


The Council is currently performing below both the national target of 0.48% and the stricter service target of 0.35%.

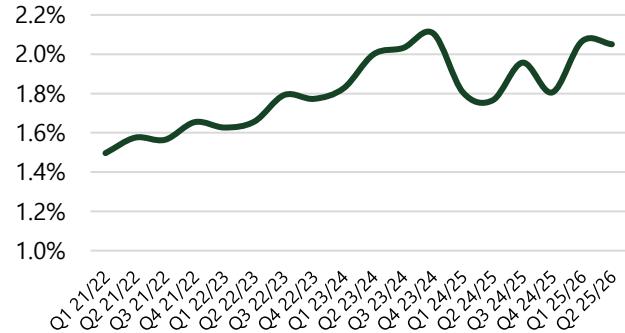
How do we compare?

Benchmarking currently not available. The Data & Performance Team will investigate options.

# (Snapshot) Long Term Empty Properties



% Long Term Empties of the Total Housing Stock



## Direction of Travel

Against last Quarter



Against last Year



Decreased since last quarter  
but increased since last year

## Lower is Good

No Target

921

During Q2, the Council saw a slight reduction in the number of long-term empty properties (vacant for six months or more). This modest decrease may reflect seasonal patterns in the housing market, such as reduced activity during the summer holiday period.

It is also worth noting that the majority of long-term empty properties have been vacant for less than two years, with around 52% falling into this category. If the measure were based only on properties empty for over two years, the figures would reduce significantly to 442 properties.

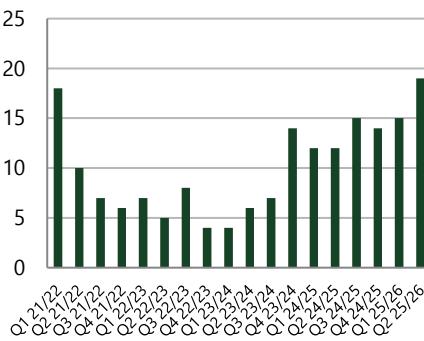
## How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

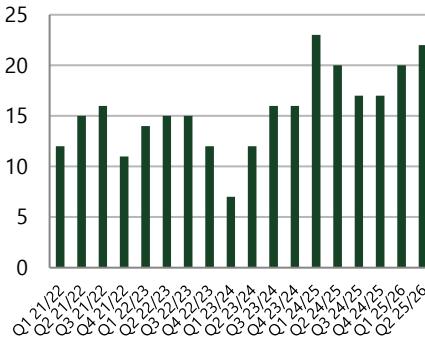
(Snapshot) Number of households in B&B/hotel-type accommodation & Hostels (LA owned or managed); and Number of successful 'Move On' into suitable independent/long-term accommodation from B&Bs/hotels/hostels

Page 194

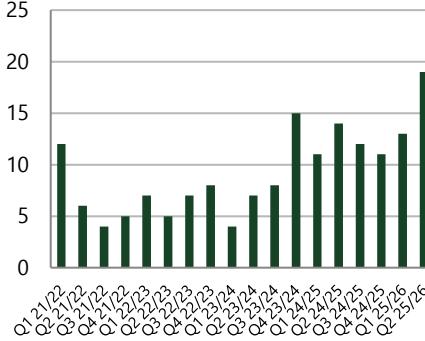
### Households in B&B/hotel type accommodation



### Households in hostels



### Successful 'Move on' into suitable independent/LT accommodation



### Direction of Travel

Against Last Quarter	B&Bs/Hotels	⬆
Against Last Year	B&Bs/Hotels	⬆
Against Last Quarter	Hostels	⬆
Against Last Year	Hostels	⬇
Against Last Quarter	Move Ons	⬆
Against Last Year	Move Ons	⬆

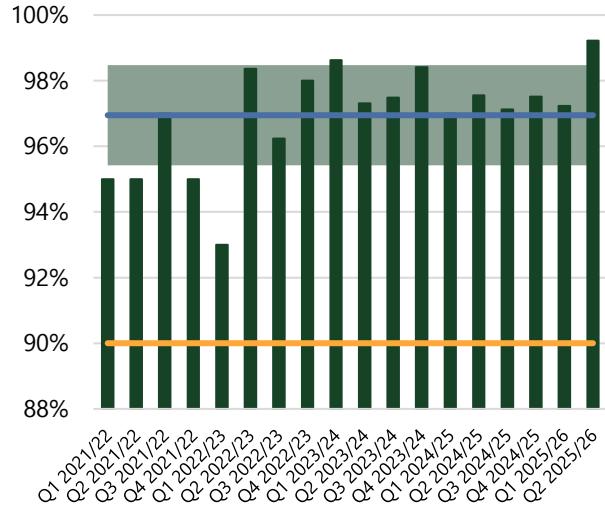
Homelessness remains a key area of focus. In Cotswold, the number of people seeking support has levelled off, suggesting that the council's proactive prevention strategies are having a positive impact.

A slight seasonal rise in rough sleeping has been observed, increasing from typically zero or one individual to two or three. This pattern is expected during colder months, when individuals are more likely to engage with council services.

### How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

# Customer Satisfaction - Telephone



% Satisfied



Mean



Target



± 1SD Range

**Higher is Good**

 Target  
Actual

 90%  
99.22%

## Direction of Travel

 Against last  
Quarter

 Against last  
Year

 Increased since last quarter and  
last year

## How do we compare?

The Govmetric Channel Satisfaction Index is a monthly publication of the top performing councils across the core customer access channels. At least 100 customers need to be transferred to the survey to be included in the league table so even if satisfaction is high, it may not be included.

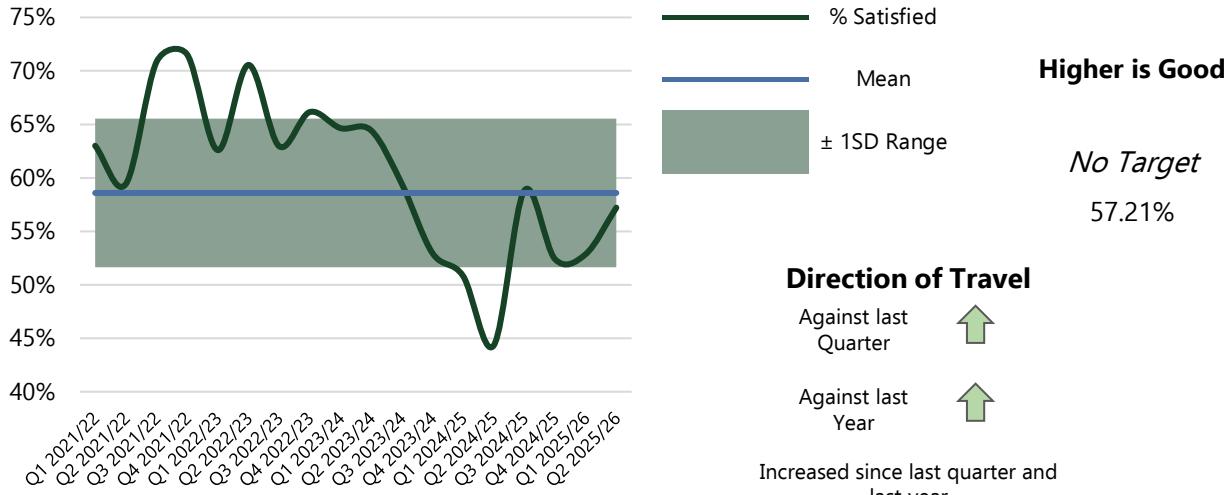
Telephone satisfaction remained consistently high throughout Q2, supported by efforts to encourage survey participation and gather valuable feedback.

A total of 513 residents participated in the survey, of these, 509 customers reported being satisfied with the service, reflecting a high level of overall satisfaction.

	July Rank	July Net Sat.	Aug Rank	Aug Net Sat.	Sept. Rank	Sept. Net Sat.
Cotswold	1	99%	2	97%	1	99%
Forest	2	96%	1	98%	N/A	N/A
West	2	96%	4	95%	2	98%

# Customer Satisfaction - Email

Page 196



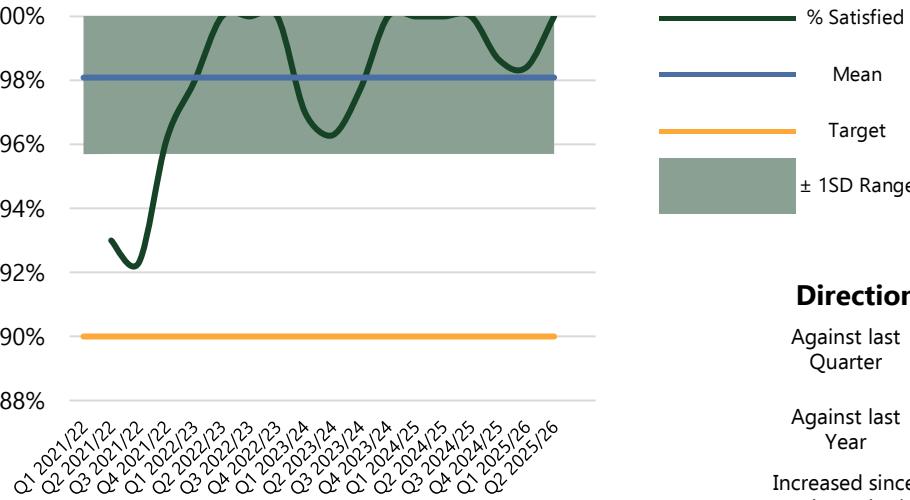
A total of 430 residents participated in the email satisfaction survey, with 246 respondents indicating they were satisfied with the service received. As part of efforts to strengthen customer insight, all customer service emails issued through Salesforce include a built-in survey link, enabling residents to provide feedback quickly and easily.

Following a previous rise in negative feedback, a review was undertaken to identify the underlying causes of dissatisfaction. The analysis highlighted recurring issues such as missed bin collections, delays in container deliveries. The customer service team continues to monitor feedback closely and proactively seeks opportunities to enhance the overall customer experience.

## How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

# Customer Satisfaction - Face to Face



**Higher is Good**

**Direction of Travel**

Against last  
Quarter



Against last  
Year



Increased since last quarter  
and steady since last year

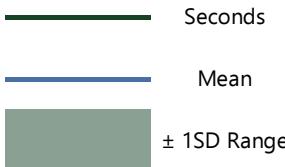
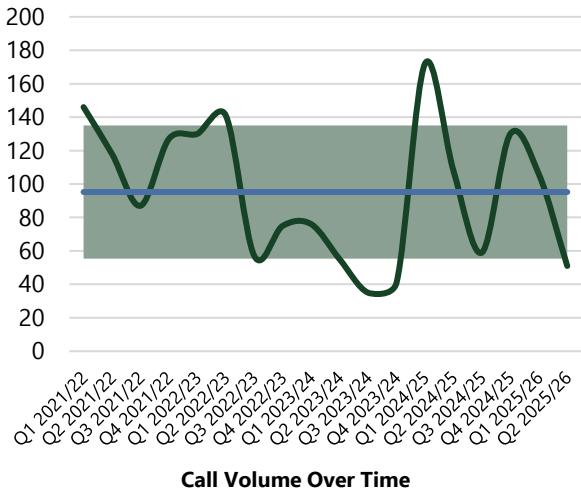
Customer satisfaction with face-to-face interactions remains consistently strong. This continued performance underlines the value of maintaining accessible in-person services as a key part of delivering a positive and inclusive customer experience.

## How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

# Customer Call Handling - Average Waiting Time

Page 198



**Lower is Good**

*No Target*

51 Seconds

## Direction of Travel

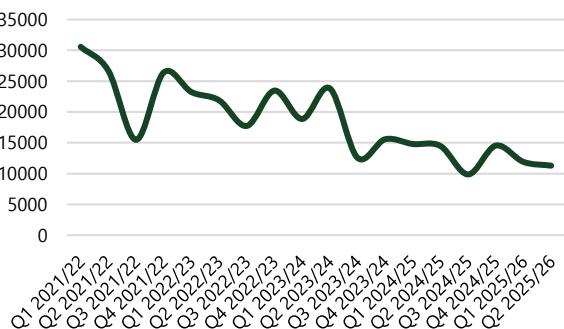
Against last Quarter



Against last Year



Decreased since last quarter and last year



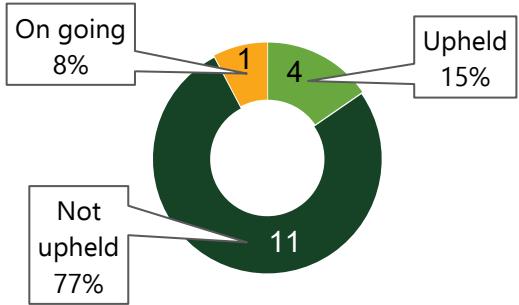
## How do we compare?

SPARSE are investigating pulling together Customer Services benchmarking data and if there is sufficient demand and suitably similar metrics to provide comparison across similarly rural local authorities we will work with them to assess any crossover in metrics and potential presentation.

In Q2, average call waiting times in Cotswold improved by around one minute compared to the same period last year, reflecting continued progress in service efficiency. Call volumes also declined, with 11,283 calls received, down 3,189 year-on-year, highlighting the success of the Channel Choice strategy in encouraging digital self-service. This shift in customer behaviour has supported the effectiveness of shorter phone hours and helped maintain performance levels. Quarter 2 is typically a steady time of year, which has helped minimise pressure on Customer Services. Despite seasonal challenges such as annual leave across services, strong operational oversight ensured continuity and stable performance. The team remained well-prepared and responsive, supported by regular training and refresher sessions that kept staff knowledge up to date.

# Number of complaints upheld

## Complaints by Status



### Direction of Travel

Complaints upheld or partly upheld at Stage 1

Against last  
Quarter

Against last  
Year



Decreased since last quarter but  
slightly increased since last year

See the table on the following page for a breakdown of those upheld and partially upheld.

A new Customer Feedback Procedure went live on the 1st April 2025.

The new process has the following stages:

- Stage 1: A review of the complaint will be undertaken by an Operational Manager within the Service Area to which the complaint relates. A response needs to provide within 10 working days from the date that we advised that the complaint was valid.
- Stage 2: Requests for Stage 2 will be acknowledged and logged within five working days of the escalation request being received. Upon receipt of a Stage 2 request, an investigation into the complaint will be undertaken by the Complaint Officer or a member of the Complaints Team. A response will be provided to the customer within 20 working days from receipt of the request to escalate the complaint to Stage 2. Stage 2 is the organisation's final response; the complainant can then refer their complaint to the LGO.

### How do we compare?

The table outlines the complaints received by the Ombudsman over the period, the decisions made on these cases, and the Council's compliance with any recommendations issued by the Ombudsman during this time.

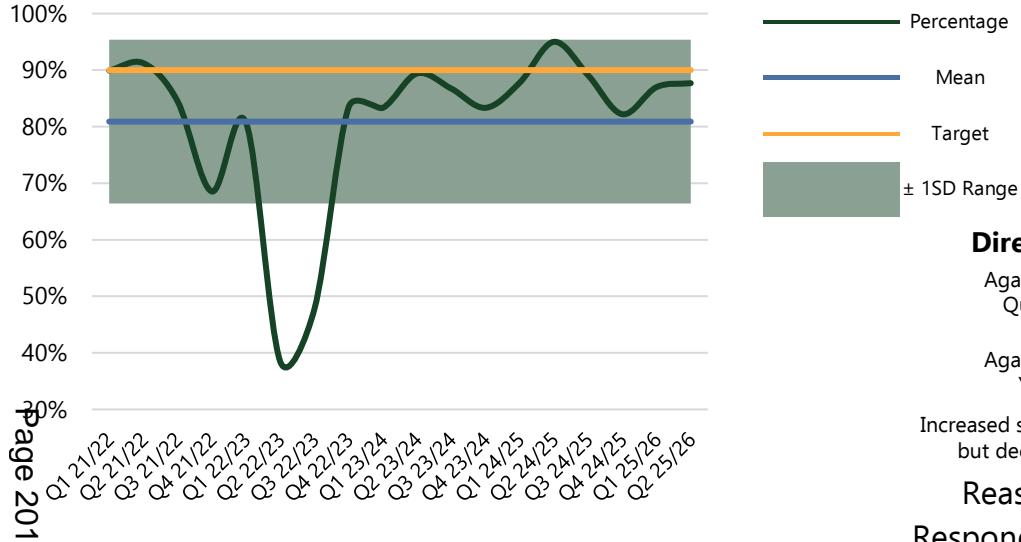
Complaints received by the Ombudsman reflect cases where customers, having completed the Council's complaint process (see to the right), feel that the Council has not satisfactorily resolved the matter.

2024-25	Complaints Investigated	Percentage Upheld	Upheld decisions per 100,000 residents	Percentage Compliance with Recommendations	Percentage Satisfactory Remedy	CIPFA Rank	Quartile
Cotswold	1	0%	0	N/A	N/A	1/13	Top
Stroud	1	100%	0.8	100%	0%	4/13	Second
Chichester	2	100%	1.6	100%	0%	9/13	Third
South Hams	2	100%	2.2	100%	50%	13/13	Bottom

# Complaints Upheld or Partially Upheld Breakdown

Service area	Description	Outcome/learning	Decision	Response time (days)
ERS	The department did not provide a response regarding a licensing allegation.	Service explained that, as the matter is under police investigation, they are awaiting feedback from the police before proceeding. An apology was given for the delay.	Upeld	7
Page 20 Revenues & Benefits	A system glitch caused the customer to receive incorrect council tax bills each month, which led to multiple summonses being issued.	Service explained the issue to the customer, and an apology was provided for the inconvenience.	Upeld	7

# Percentage of FOI requests answered within 20 days



Page 201

**Higher is Good**

Target 90%  
Actual 87.69%

## Direction of Travel

Against last Quarter

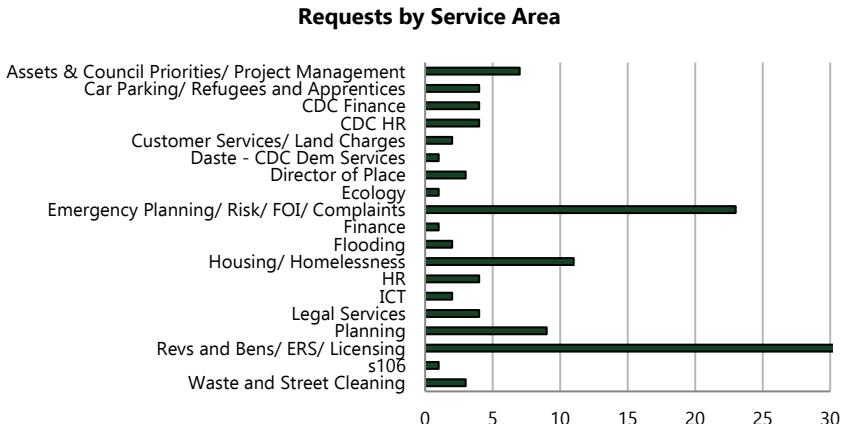
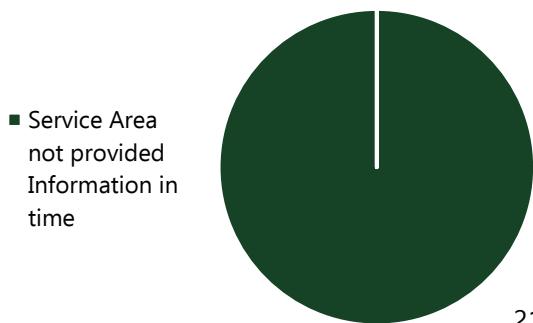


Against last Year

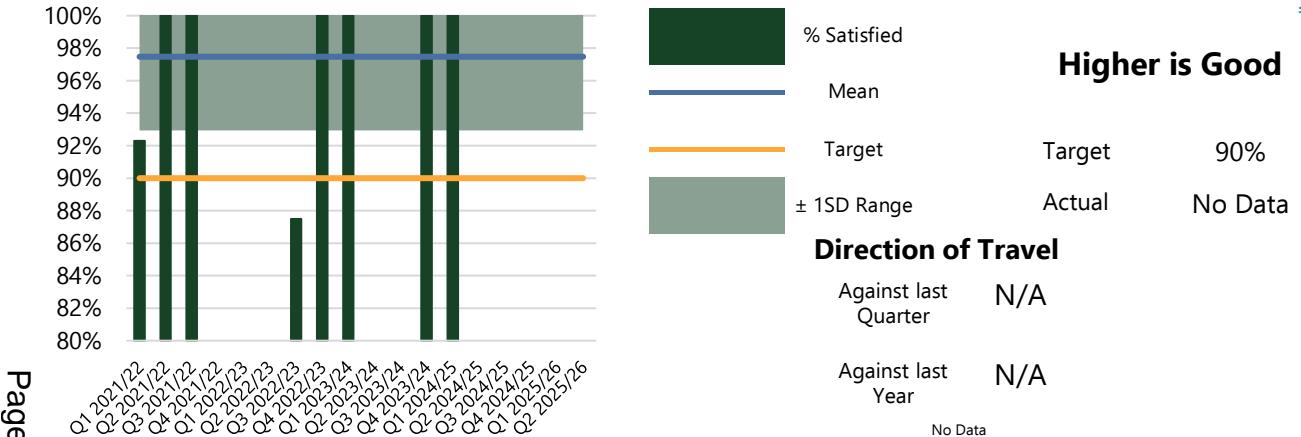


Increased slightly since last quarter  
but declined since last year

## Reasons for Delays in Responding to FOI Requests Beyond the 20-Day Deadline



# Building Control Satisfaction



Page 202

Satisfaction survey data continues to present challenges due to low response rates, with no surveys received this quarter. To improve this, a webform was developed and has been attached to completion certificates from October onwards.

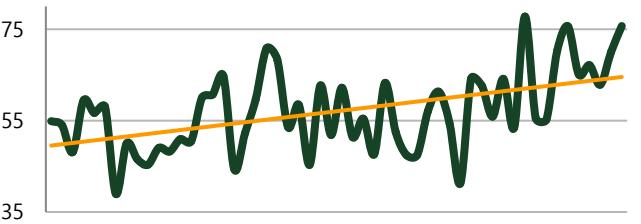
In Q2, the market share averaged 70%, with 146 applications processed, reflecting a 8% increase in market share compared to the same period last year. However, application volumes remained steady, with only a slight year-on-year increase of 8.

The below chart shows market share over time from April 2021

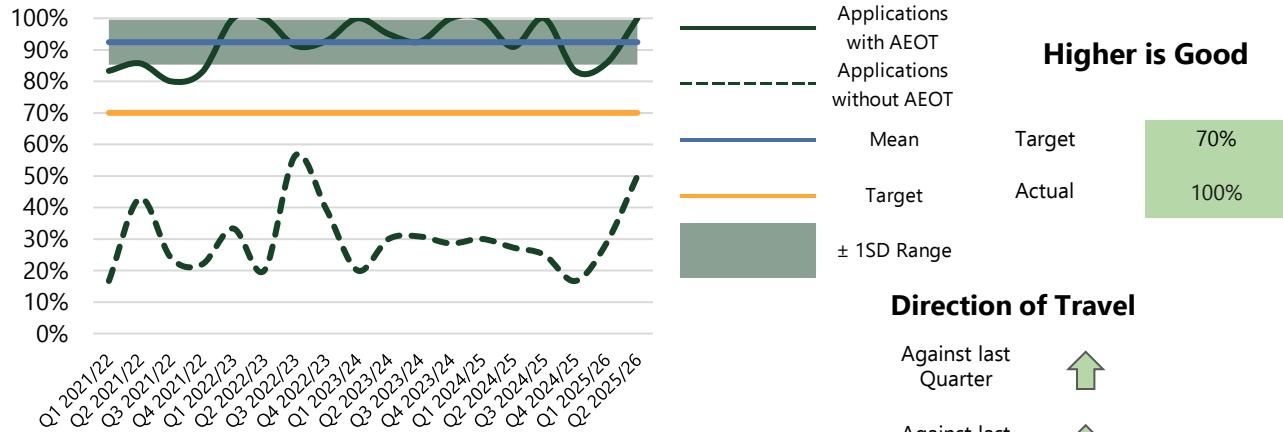
## How do we compare?

Percentage of share in the market

April	May	June	Number of Apps for Quarter
63%	70%	76%	146



# Percentage of major planning applications determined within agreed timescales (including Agreed Extensions of Time (AEOT))



Page 203

## How do we compare?

Major Developments - % within 13 weeks or agreed time – LG Inform. Latest dataset is April - June '25 (Q1 2025-26)

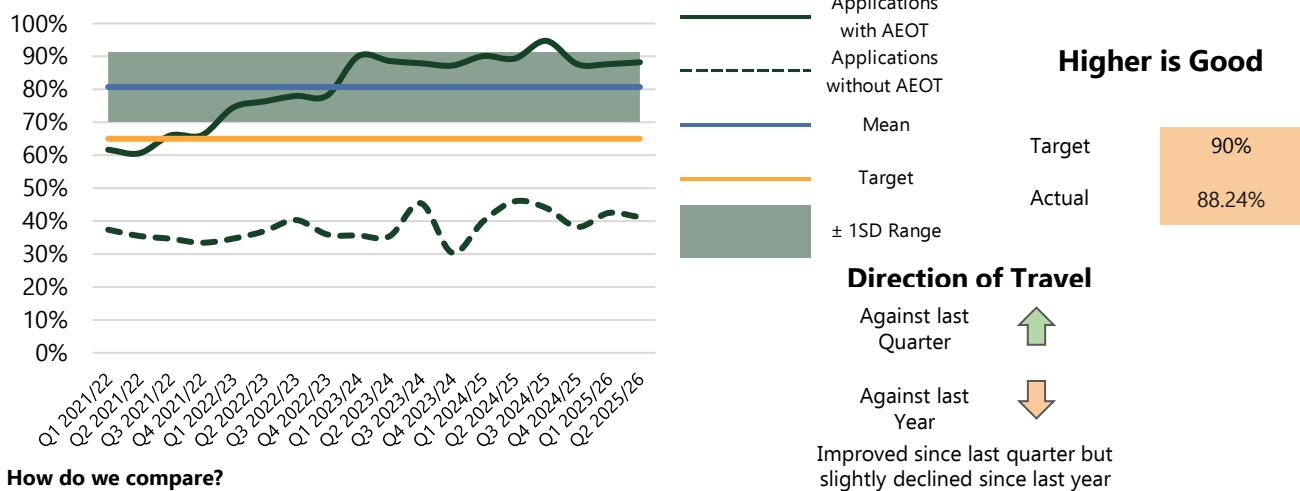
Q1 25-26 Benchmark	%	CIPFA Rank	Quartile
Babergh	100	1/16	Top
South Hams	100	1/16	Top
Stratford-on-Avon	91	11/16	Third
<b>Cotswold</b>	<b>86</b>	<b>13/16</b>	<b>Bottom</b>
Lichfield	83	14/16	Bottom
Wychavon	77	16/16	Bottom

The service has maintained strong performance in processing Major applications within the agreed timeframes.

During Q2, twelve major applications were determined.

[See slide for Minor Developments for further narrative](#)

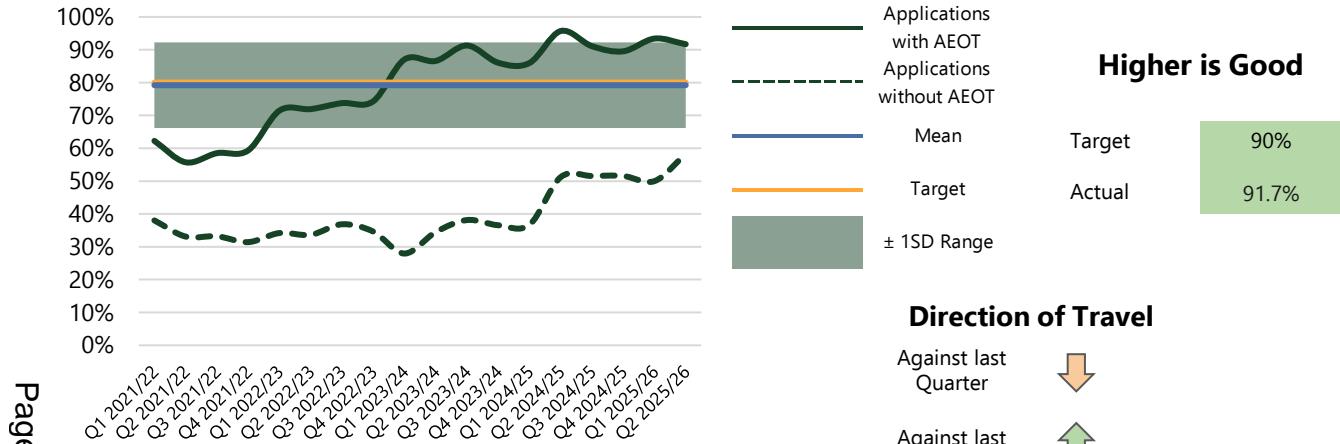
# Percentage of minor planning applications determined within agreed timescales (including AEOT)



This quarter, the Council maintained strong performance in processing minor planning applications within statutory timeframes. However, results fell slightly short of the newly introduced 90% service target, which was implemented following recommendations in the Planning Advisory Service (PAS) report. The Planning team continues to make steady progress on delivering the PAS action plan, designed to improve service quality and tackle long-standing challenges. Key priorities include a staffing restructure, enhancements to enforcement processes, and a review of pre-application services. Several sub-actions are on track for launch by the next financial year, including a new negotiation protocol and a Planning Performance Agreement (PPA) strategy.

Q1 25-26 Benchmark	%	CIPFA Rank	Quartile
Mid Devon	99	1/16	Top
Chichester	96	3/16	Top
Malvern Hills	91	6/16	Second
<b>Cotswold</b>	<b>88</b>	<b>11/16</b>	<b>Third</b>
Maldon	85	15/16	Bottom
East Hampshire	68	16/16	Bottom

# Percentage of other planning applications determined within agreed timescales (including AEOT)



Page 205

## How do we compare?

Other Developments - % within 8 weeks or agreed time – LG  
Inform. Latest dataset is April - June '25 (Q1 2025-26)

Q1 25-26 Benchmark	%	CIPFA Rank	Quartile
Chichester	100	1/16	Top
West Devon	98	3/16	Top
<b>Cotswold</b>	<b>93</b>	<b>8/16</b>	<b>Second</b>
Maldon	92	11/16	Third
Mid Devon	91	13/16	Bottom
Derbyshire Dales	85	16/16	Bottom

The Council has performed very well in processing Other applications within agreed timeframes.

In Q2, a total of 229 Other applications were determined.

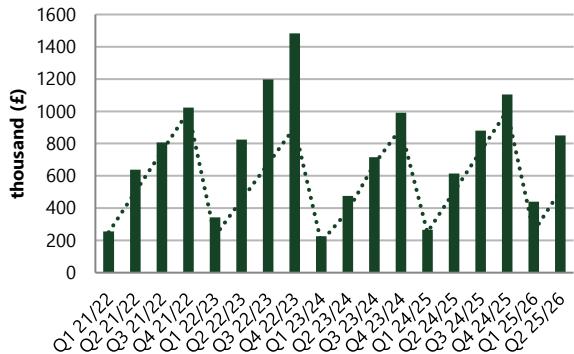
As of the end of the quarter, the Council's rolling average stands at 90.06%, significantly above the government's 70% threshold for non-major applications. This reflects the service's robust and consistent performance over the past year.

[See slide for Minor Developments for additional narrative](#)

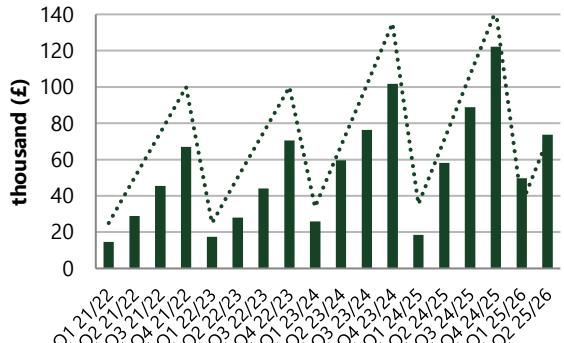
# Total Income achieved in Planning & Income from Pre-application advice

Page 206

Total planning income



Pre-application income



## How do we compare?

Planning Advisory Service (PAS) planned to benchmark back in [2021](#). No data is available in the public domain.

## Direction of Travel

### Total Planning Income

Against last Quarter 

Against last Year 

### Pre-Application Income

Against last Quarter 

Against last Year 

## Higher is Good

### Total Planning Income (£)

Target	508,248
Actual	849,881

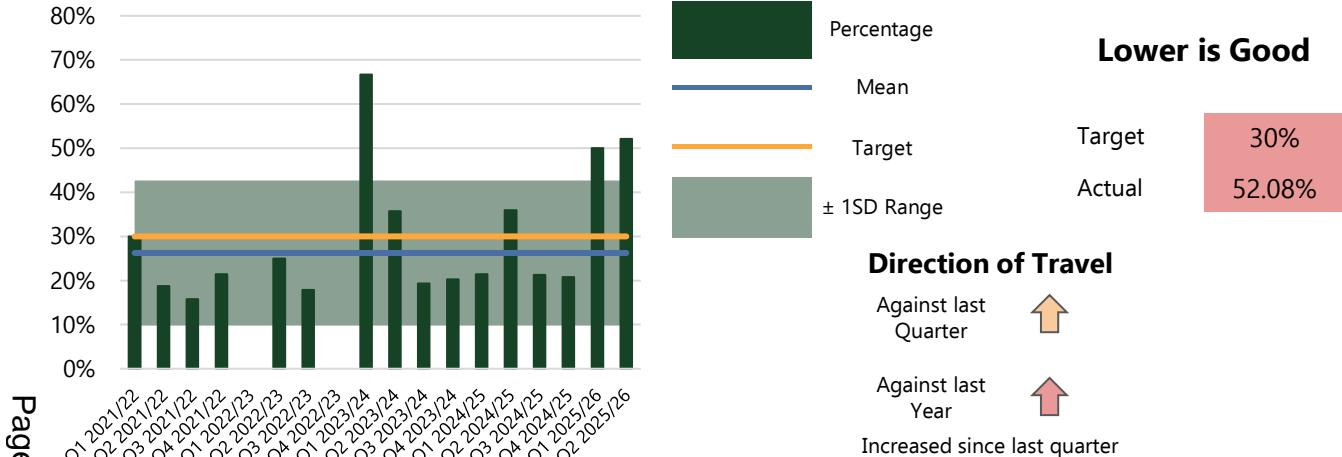
### Pre-Application Income (£)

Target	71,000
Actual	73,734

Total Income – Slightly decreased since last quarter but increased since last year  
 Pre-App Income – Decreased since last quarter but increased since last year

The Council maintained a steady flow of major planning applications this quarter, alongside strong pre-application interest—both indicators of ongoing developer confidence and active site promotion. Major applications accounted for around 20% of total income, underlining their significant contribution to the service. Additionally, pre-application income exceeded targets, further reinforcing the sustained interest in development opportunities across the district and suggesting continued confidence in the area's growth potential.

# Percentage of Planning Appeals Allowed (cumulative)



Page 207

## How do we compare?

Percentage of planning appeals allowed – LG Inform. Latest dataset is April - June '25 (Q1 2025-26)

Q1 25-26 Benchmark	%	CIPFA Rank	Quartile
Lichfield	0	1/16	Top
Chichester	29	4/16	Top
Maldon	38	8/16	Second
West Devon	44	11/16	Third
<b>Cotswold</b>	<b>50</b>	<b>13/16</b>	<b>Bottom</b>
Tewkesbury	57	16/16	Bottom

This indicator aims to ensure that no more than 30% of planning appeals are allowed in favor of the applicant, with a lower percentage being more favorable. According to the latest statistics from the Planning Inspectorate, the national average for Section 78 planning appeals granted is 28% (source: [gov.uk](https://www.gov.uk)).

Between 1 July and 30 September 2025, seventeen appeals were decided, with nine allowed in favour of the applicant, resulting in a 52.94% allowance rate for the quarter.

**Lower is Good**

## Direction of Travel

Against last Quarter



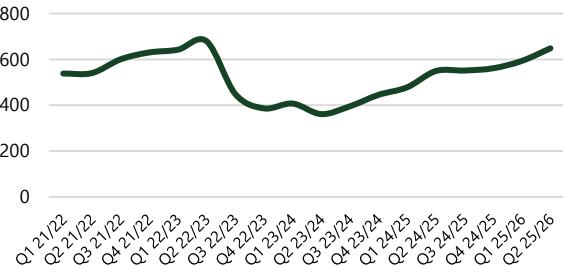
Against last Year



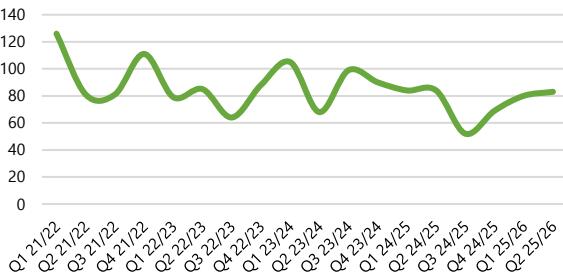
Increased since last quarter and last year

# (Snapshot) Planning Enforcement Cases

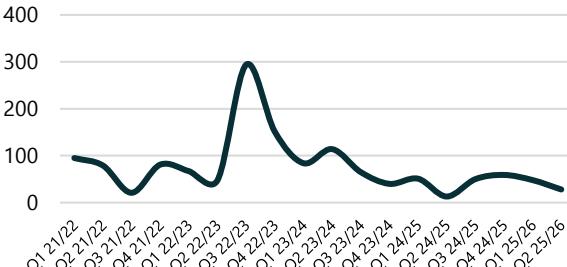
Open Cases at end of Quarter over Time



Number of Cases Opened During the Quarter over Time



Number of Cases Closed During the Quarter over Time



## Direction of Travel for Open Cases at end of Quarter

Against last Quarter  
Against last Year

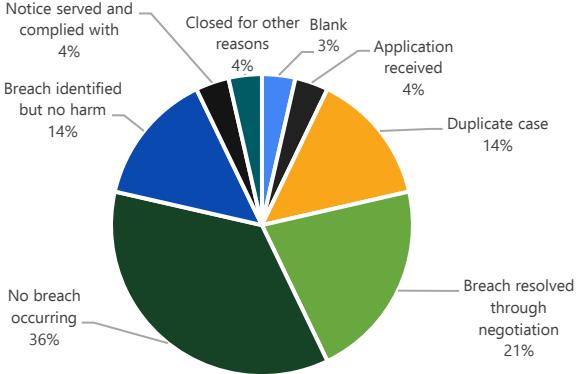
**Lower is Good**

No Target

Open Cases at End of Quarter

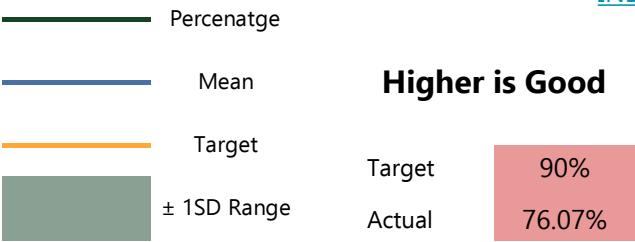
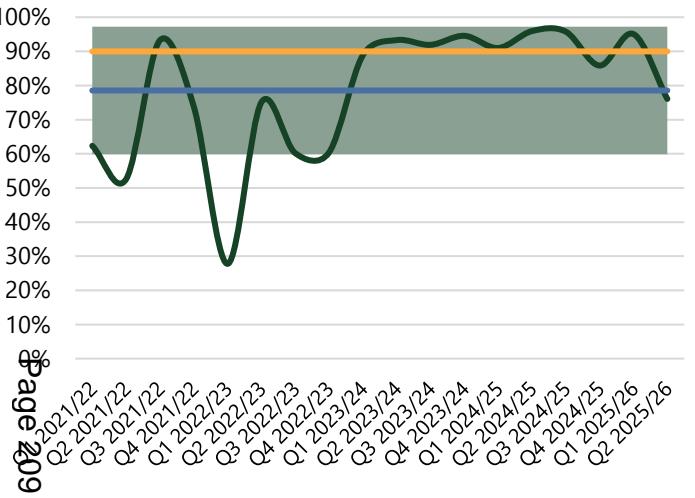
648

## Reasons for Closure



The Enforcement team was affected by staffing shortages over the summer. Staffing levels are now improving, and a backlog clearance plan is in development. The team is also reviewing its use of Uniform and updating the enforcement plan to enhance efficiency and effectiveness. A successful member briefing in September provided a valuable opportunity for feedback and clarification.

# Percentage of official land charge searches completed within 10 days



## Direction of Travel

Against last Quarter



Against last Year



Declined since last quarter and last year

During Quarter 2, Cotswold's performance against the 10-day target for completing official Land Charges searches declined from 95.07% in Q1 to 76.07% in Q2, falling below the 90% target.

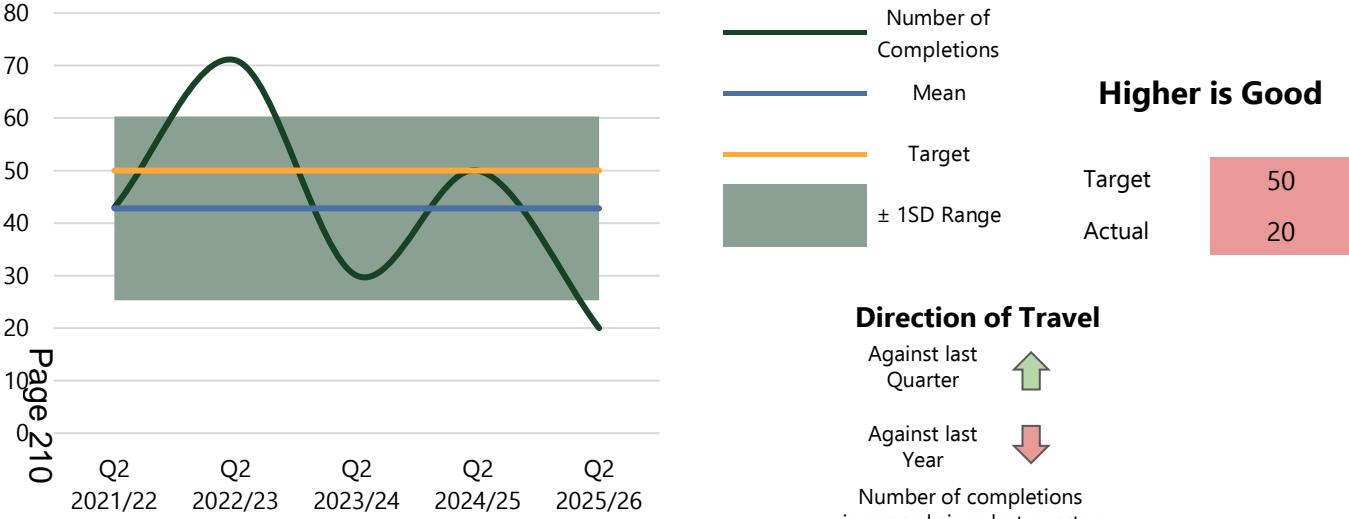
It is important to note that performance remained strong throughout July and August, with Cotswold achieving 97.64%, well above target. The overall quarterly decline reflects a sharp fall in September, which coincided with the long-term absence of a Land Charges team member.

Looking ahead, support from the Customer Service and Support Service Team has been provided to improve resilience. This will help free up specialist staff to focus on completing searches, which is expected to improve performance and service continuity.

## How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

# Number of affordable homes delivered (cumulative)



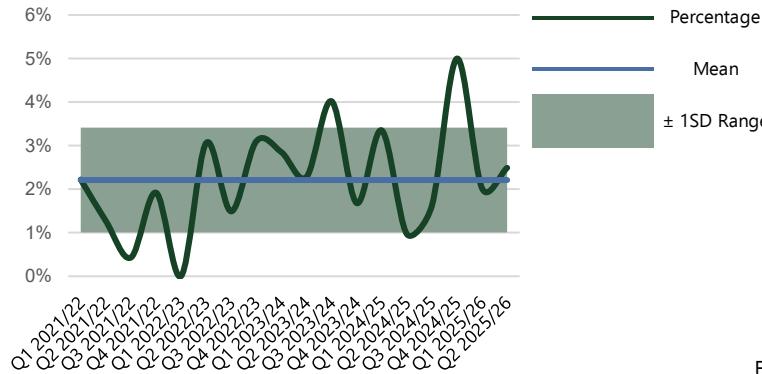
In Cotswold, eighteen affordable homes were delivered during Q2. Projections from Registered Providers show 64 completions for 2025/26, well below the target of 100, making it unlikely the district will meet its goal. Delivery often fluctuates due to long build times and multi-year phases, and early over delivery under the current strategy has contributed to lower recent levels.

## How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

# Number of fly tips collected and percentage that result in an enforcement action

(defined as a warning letter, fixed penalty notice, simple caution or prosecution)



## Direction of Travel

### Number of Fly Tips

Against last Quarter



No Target

Number of Fly Tips Collected

Mean

± 1SD Range

Against last Year



### Percentage Enforcement Action

Against last Quarter



142

Percentage Enforcement Action

Against last Year



2.49%

Fly Tips – Steady since last quarter but declined since last year

Enforcement Action – Increased since last quarter and last year

## How do we compare?

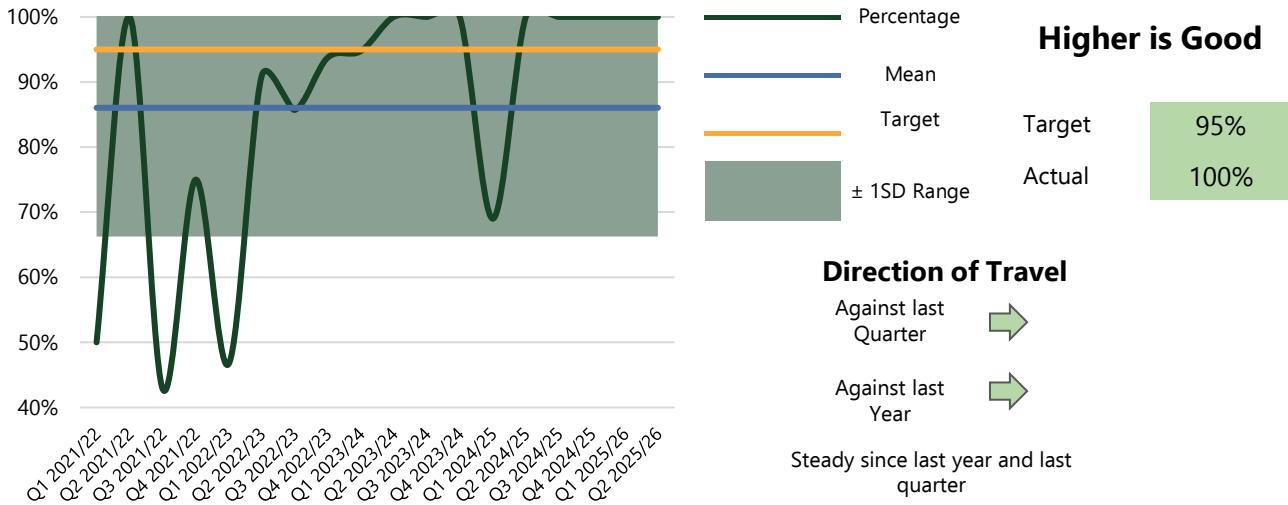
Number of Fly Tips reported for year 2022-23 for Local Authorities in England – Gov.uk. The latest dataset available is 2023-24

2023-24 Benchmark	Total Fly Tips	Total Enforcement Actions	Total FPNs	% FPNs per Fly Tip	CIPFA Nearest Neighbours Rank	Quartile
Maldon	364	392	13	3.57	1/16	Top
<b>Cotswold</b>	<b>972</b>	<b>58</b>	<b>12</b>	<b>1.23</b>	<b>6/16</b>	<b>Second</b>
Wychavon	835	192	3	0.36	10/12	Third
West Devon	346	0	0	0	16/16	Bottom

This summer, the Council delivered a highly successful SCRAP fly-tipping campaign, driving strong public engagement and widespread media coverage across radio, TV, and print. The campaign focused on raising awareness of residents' duty of care when disposing of waste and concluded with a multi-agency Stop and Search operation in Bourton, showcasing effective partnership working with Police and Trading Standards. The operation reinforced the campaign's message and built on its positive momentum, which included high social media reach and strong community response.

# Percentage of high risk food premises inspected within target timescales

Page 212



The Council conducted thirteen inspections during Q2, all of which were completed within the timescale.

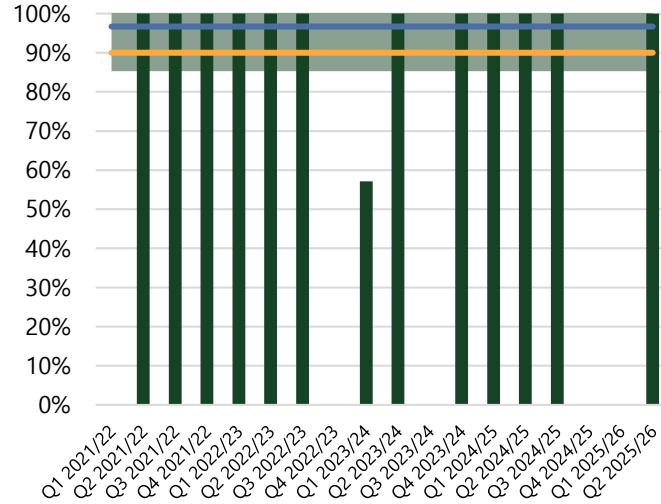
High-risk food inspections are prioritised due to their greater potential impact on public health and safety enabling issues to be addressed swiftly. However, this focus can occasionally delay scheduled inspections for lower-risk food businesses. To mitigate this, the service uses a dashboard to track both high- and lower-risk inspections, ensuring that, despite the emphasis on high-risk establishments, lower-risk inspections are still completed promptly to maintain overall compliance and safety standards.

## How do we compare?

No benchmarking currently available. The Data & Performance Team will investigate options

# % High risk notifications risk assessed within 1 working day

(including food poisoning outbreaks, anti-social behaviour, contaminated private water supplies, workplace fatalities or multiple serious injuries)



Percentage



Mean



Target



± 1SD Range

**Higher is Good**

90%
100%

**Direction of Travel**

 Against last Quarter N/A

 Against last Year ➡

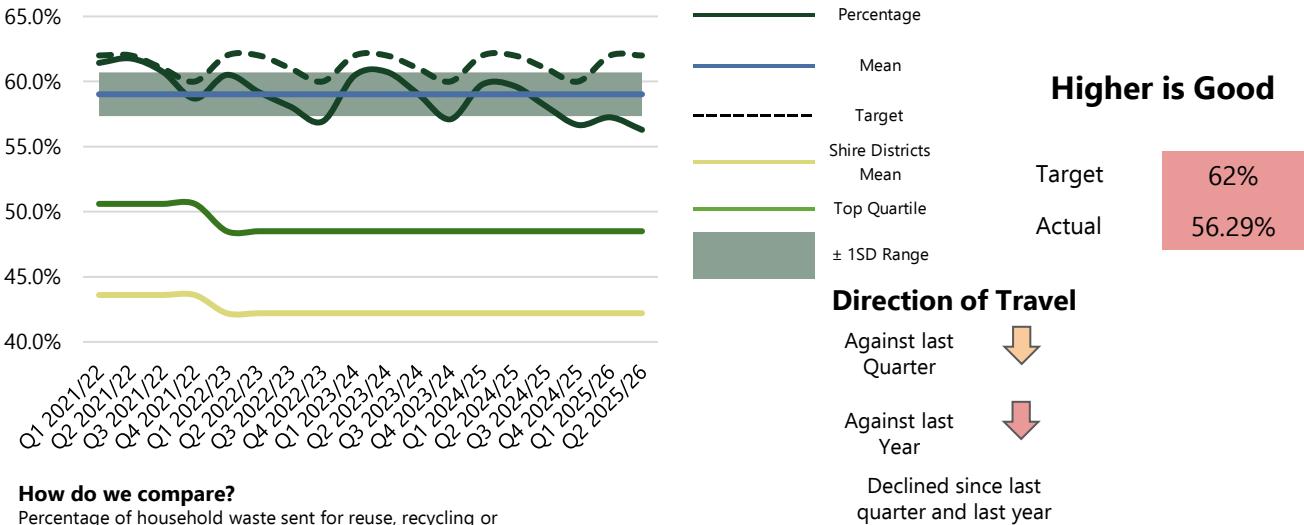
Steady since last year

One high-risk notification was received during Q2 relating to a sewage leak, which was assessed within the target timescale.

**How do we compare?**

No benchmarking currently available. The Data & Performance Team will investigate options

# Percentage of household waste recycled



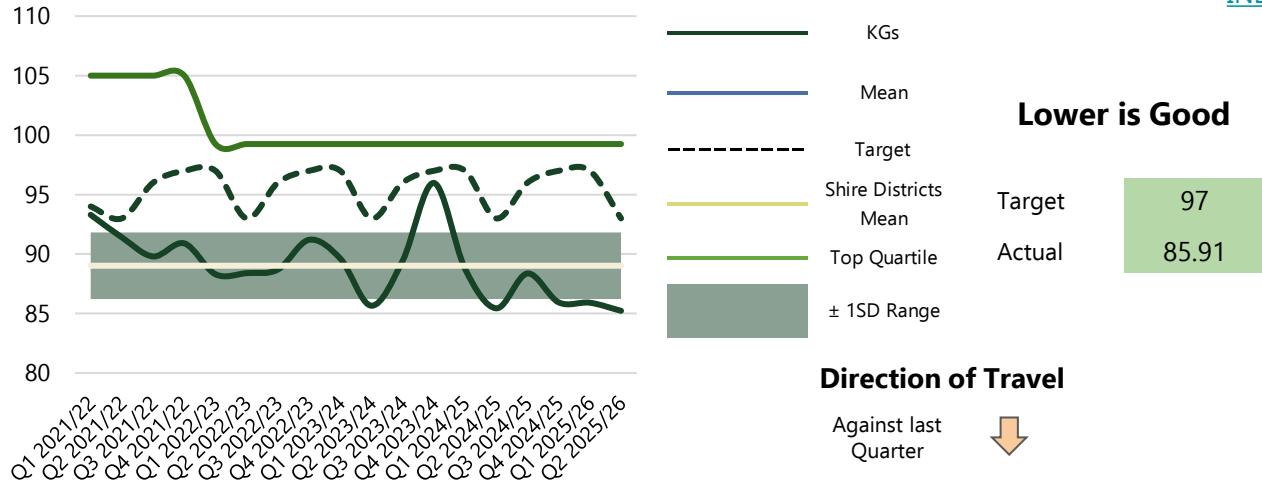
## How do we compare?

Percentage of household waste sent for reuse, recycling or composting – Gov.uk. The latest dataset available in 2023-2024

2023-24 Benchmark	%	CIPFA Rank	Quartile
Stratford-on-Avon	61	1/16	Top
Maldon	57.2	3/16	Top
<b>Cotswold</b>	<b>57.1</b>	<b>5/16</b>	<b>Second</b>
South Hams	46.6	10/16	Third
Lichfield	45.1	13/16	Bottom
East Hampshire	34.5	16/16	Bottom

The Council's recycling rate declined by around 2.5% compared to the same period last year, reflecting a wider national trend. Unusually dry weather locally led to a 25% drop in garden waste tonnages—significantly impacting overall recycling performance, as garden waste forms a substantial part of the recycling stream. Despite this, the Council remains above the national average and in the top quartile of councils in England.

# Residual Household Waste per Household (kg)



Page 215

## How do we compare?

Residual household waste per household (kg/household) – Gov.uk. The latest dataset available in 2023-2024

2023-24 Benchmark	Kg	CIPFA Rank	Quartile
Stroud	298.6	1/16	Top
Stratford-on-Avon	320.0	4/16	Top
Maldon	350.2	8/16	Second
<b>Cotswold</b>	<b>358.0</b>	<b>9/16</b>	<b>Third</b>
Wychavon	436.5	13/16	Bottom
Babergh	461.4	16/16	Bottom

## Direction of Travel

Against last Quarter



Against last Year



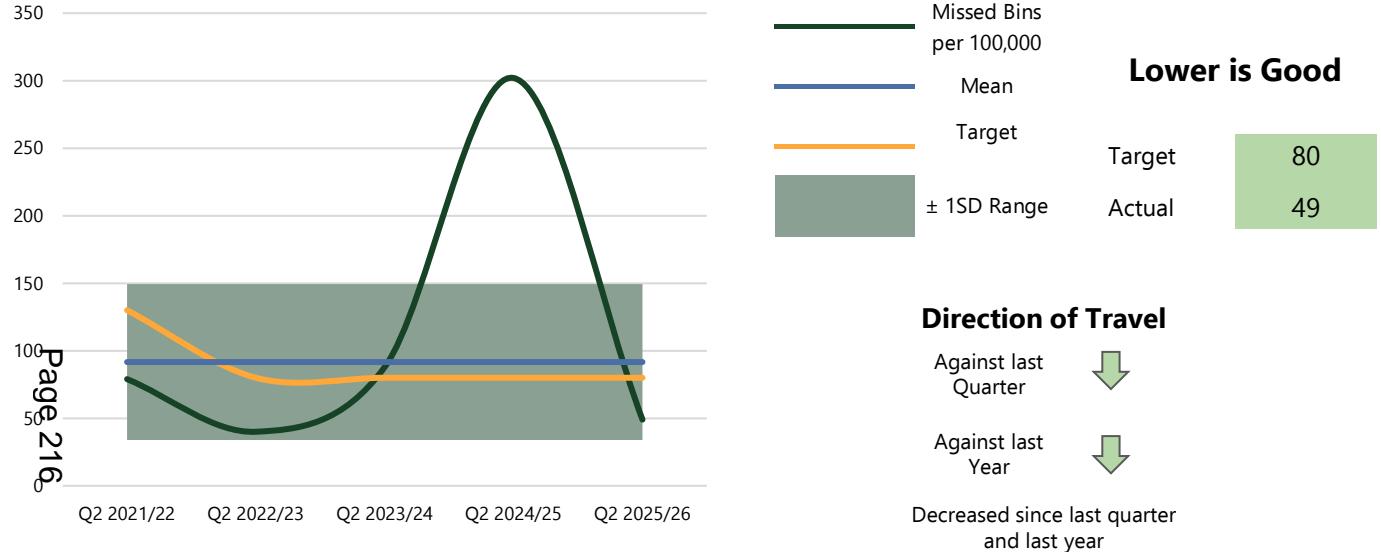
Decreased since last quarter and last year

Residual household waste levels typically follow seasonal patterns, and targets are set accordingly.

In Q2, the Councils remained below their residual waste targets and also outperformed the Shire Districts' median of 111 kg per household. They also ranked within the top quartile of English District Local Authorities, with residual waste levels below the 99.25 kg threshold.

This continued strong performance highlights the Councils' effective waste reduction efforts and their position as national leaders in managing household waste.

# Missed bins per 100,000



How do we compare?

Missed collections per 100,000 collections (full year) - APSE

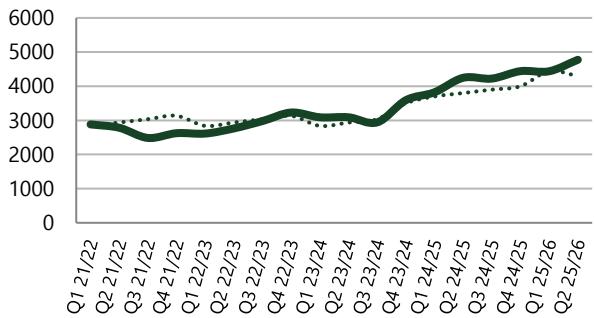
2022-23 Benchmark	Missed collections per 100,000 collections	Family Group Rank	Family Group Quartile	Whole Service Rank	Whole Service Quartile
Cotswold	109.89	12/14	Bottom	39/45	Bottom

Missed bin rates in Cotswold fell to 49 misses per 100,000 collections, below the target of 80. During the quarter, staff and process changes, plus improved communication via memos and toolbox talks, helped reinforce the importance of returning to missed collections. Work is ongoing to reassign approximately 700 properties to new rounds, locations repeatedly missed following the main service reorganisation.

# Number of visits to the leisure centres & (Snapshot) Number of gym memberships

----- Target

## Number of gym memberships



## Direction of Travel

Gym Memberships

Against last Quarter



Against last Year



Leisure Visits

Against last Quarter



Against last Year



**Higher is Good**

Gym Memberships

Target

4,300

Actual

4,774

Leisure Visits

Target

129,900

Actual

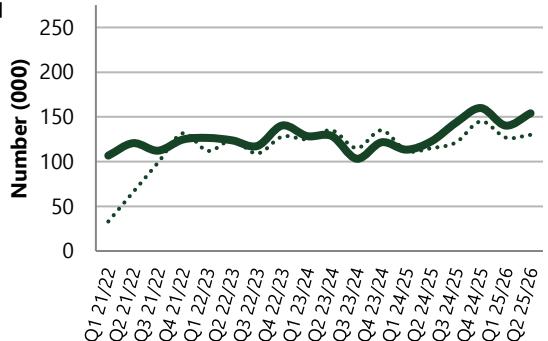
154,011

Gym Memberships – Increased since last quarter and last year

Leisure Visits – Increased since last quarter and last year

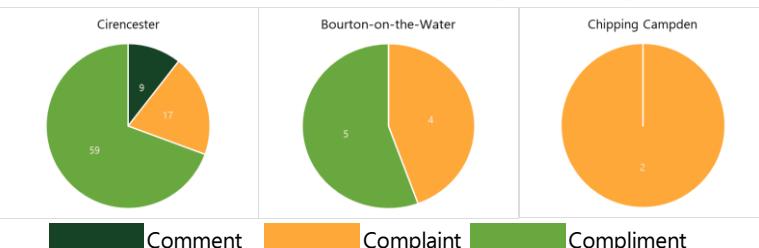
Page 217

## Visits to leisure facilities



The Council exceeded its Q2 leisure targets, with memberships 11% and visits 18.6% above target. Learn to Swim participation has rebounded following COVID and instructor shortages, supported by recruitment and promotion. Recent engagement efforts have boosted participation, with "Meet the Manager" sessions planned for Q3 to gather feedback and support service development.

Freedom Leisure receives and reviews all submitted comment cards for each of its leisure centres. The information below is organised by centre and indicates whether the feedback received was a comment, complaint or compliment.



How do we compare?

The Data Team are currently working with partners to compile the data return for APSE performance networks which will then provide benchmarking for this metric.

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# Agenda Item 15



**COTSWOLD**  
District Council

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET - 8 JANUARY 2026</b>
Subject	<b>FINANCIAL PERFORMANCE REPORT – Q2 2025/26</b>
Wards affected	All
Accountable member	Cllr Patrick Coleman, Cabinet Member for Finance Email: <a href="mailto:patrick.coleman@cotswold.gov.uk">patrick.coleman@cotswold.gov.uk</a>
Accountable officer	David Stanley, Deputy Chief Executive and Section 151 Officer Email: <a href="mailto:david.stanley@cotswold.gov.uk">david.stanley@cotswold.gov.uk</a>
Report author	Michelle Burge, Chief Accountant and Deputy Section 151 Officer Email: <a href="mailto:michelle.burge@cotswold.gov.uk">michelle.burge@cotswold.gov.uk</a>
Summary/Purpose	This report sets out the second quarterly budget monitoring position for the 2025/26 financial year.
Annexes	Annex A – Capital Programme Outturn Forecast Annex B – Non-Treasury Management Prudential Indicators
Recommendation(s)	<p>That Cabinet resolves to:</p> <ol style="list-style-type: none"> <li>1. Review and note the financial position set out in this report.</li> <li>2. Approve the additional transfers to earmarked reserves as set in paragraph 4.12 of the report.</li> <li>3. Endorse the principle to transfer 100% of any year-end Planning Fee income (over and above the budgeted level) to the Planning Appeals earmarked reserve, as set out in paragraph 4.23 of the report.</li> <li>4. Approve the reallocation of the UKSPF capital budget as follows: <ul style="list-style-type: none"> <li>- £0.229m to Rural England Prosperity</li> <li>- £0.060m to UK Shared Prosperity Fund (UKSPF Capital)</li> </ul> This results in a net reduction of £0.038m, in line with allocations from Government. </li> </ol>
Corporate priorities	<ul style="list-style-type: none"> <li>• Delivering Good Services</li> </ul>



**COTSWOLD**  
District Council

Key Decision	YES
Exempt	NO
Consultees/ Consultation	None



## **1. BACKGROUND**

- 1.1** This report presents to members the second quarterly outturn forecast and monitoring position statement for the 2025/26 financial year.
- 1.2** The purpose of this report is to notify members of any significant variations to budgets, highlight any key financial issues, and to inform members of options and further action to be taken.

## **2. EXECUTIVE SUMMARY**

- 2.1** This report sets out the outturn forecast for the financial year informed by Q2 budget monitoring.
- 2.2** Cabinet will review this report at their meeting on 08 January 2026.
- 2.3** Based on the Q2 budget monitoring exercise and an assessment of the risks and uncertainties facing the Council, the forecast outturn shows a positive variation of £0.016m. Although this is a reduction from the £0.097m forecast reported at Q1, it reflects the Council's strategy to utilise the enhanced financial position this year to reduce financial pressures in future years. The forecast outturn includes proposed transfers of several forecast underspends, as outlined in section 4.13 below, providing an opportunity to strengthen financial sustainability over the Medium-Term Financial Strategy (MTFS) period.
- 2.4** The forecast outturn also assumes that **100% of planning income in excess of budget** will be transferred to the Planning Appeals Reserve, as set out in recommendation three. In addition, **£0.150m of car park income in excess of budget** is allocated to fund the replacement of pay-and-display machines within the Council's Capital Programme, thereby maximising internal resources available for capital expenditure.
- 2.5** Based on the budget monitoring exercise undertaken for Q2 and an assessment of the risks and uncertainties facing the Council, the outturn forecast is a positive variation of £0.016m, although this is a reduction in the reported forecast outturn of £0.097m reported at Q1 it reflects the fact that the Council are taking the opportunity to reduce financial pressures in future years by utilising the enhanced financial position this year. The forecast outturn includes proposed transfers of a number of forecast underspends as outlined in paragraph 4.13. This will provide the opportunity for additional financial sustainability over the MTFS-period.



**2.6** The forecast outturn position also now assumes that 100% of planning income in excess of budget is transferred to a planning appeals provision as outlined in recommendation three and that £0.150m of car park income in excess of budget is allocated to finance the replacement of pay and display machines within the Council's Capital Programme and maximise internal resources available to fund capital expenditure.

**2.7**

**Table ES1 – Revenue Budget Outturn Forecast (Q2)**

Revenue Budget	2025/26 Latest Net Budget (£'000)	2025/26 Profiled Budget to Q2 (£'000)	2025/26 Actuals to Q2 (£'000)	2025/26 Outturn Forecast (£'000)	2025/26 Outturn Variance (£'000)
<b>Subtotal Services</b>	<b>19,165</b>	<b>7,358</b>	<b>6,779</b>	<b>18,197</b>	<b>(968)</b>
Less: Reversal of accounting adjustments	(1,925)		0	(1,925)	0
<b>Revised Subtotal Services</b>	<b>17,240</b>	<b>7,358</b>	<b>6,779</b>	<b>16,272</b>	<b>(968)</b>
Corporate Income & Expenditure	(1,537)	(478)	(704)	(404)	1,133
Provisions and Risk Items	0	0	0	0	0
<b>Net Budget Requirement</b>	<b>15,704</b>	<b>6,880</b>	<b>6,074</b>	<b>15,869</b>	<b>165</b>
<b>Funded by:</b>					
Council Tax	(7,065)	0	0	(7,065)	0
Retained Business Rates	(5,117)	2,402	2,403	(5,117)	0
Government Funding - Grants	(2,527)	(632)	(635)	(2,527)	0
Government Funding - NHB	(820)	(205)	(205)	(820)	0
Extended Producer Responsibility (EPR)	(1,502)	0	0	(1,683)	(181)
Collection Fund (surplus) / Deficit	689	0	0	689	0
<b>TOTAL Funding</b>	<b>(16,342)</b>	<b>1,565</b>	<b>1,563</b>	<b>(16,523)</b>	<b>(181)</b>
<b>Budget shortfall/(surplus)</b>	<b>(638)</b>		<b>7,637</b>	<b>(654)</b>	<b>(16)</b>



**Table ES2 – Revenue Budget – Reconciliation of variations (Q2)**

Variations at a glance	Positive variation (£'000)	Adverse Variation (£'000)	Net Variation (£'000)	Q1 Outturn Variance (£'000)	Movement from Q1 (£'000)
<b>Service Variations</b>					
Fees & Charges - Cemeteries	34	34	38	(4)	
Fees & Charges - Licensing	(30)	(30)	(16)	(14)	
Fees & Charges - Building Control	(49)	(49)	0	(49)	
Fees & Charges - Bulky Waste	(20)	(20)	0	(20)	
Trinity Road - Utilities	(37)	(37)	0	(37)	
Car Park fees, permits and penalty charges	(174)	0	(174)	(55)	(119)
Car park expenditure	(26)	(26)	0	(26)	
Commercial Property - Rental income shortfall (risk)	64	64	61	3	
Tenant Area of Trinity Road	(20)	(20)	0	(20)	
Development Management Fees	(400)	(400)	(249)	(151)	
Recycling - Minor Contracts	(30)	(30)	0	(30)	
Legal	0	0	(41)	41	
Card payment processing charges	20	20	0	20	
Net Homeless Expenditure (Flexible Homeless Grant higher than budgeted)	(45)	(45)	0	(45)	
Postage and Printing	44	44	29	15	
Communications - Cotswold News	(20)	(20)	0	(20)	
Members Allowance increases (Council, 26 November 2025)	36	36	0	36	
Court Cost income (Council tax and Business Rates)	(45)	0	(45)	0	(45)
Vacancy management	(205)	0	(205)	0	(205)
Other service variations	50	50	50	1	
<b>Subtotal</b>	<b>(1,101)</b>	<b>248</b>	<b>(853)</b>	<b>(184)</b>	<b>(670)</b>
<b>Non-Service/Corporate Variations</b>					
Contingencies and Savings	(217)	0	(217)	0	(217)
Street Service savings	0	300	300	150	150
Development Management Fees - Appeals Risk	0	400	400	125	275
Impact of Publica Phase 2	(266)	0	(266)	0	(266)
New Posts not recruited	(240)	0	(240)	0	(240)
Transfer Vacancy and phase two service and recruitment saving to Capacity Building Reserve	0	710	710	0	710
Treasury Management income	(346)	0	(346)	(188)	(158)
Transfer to Treasury Management reserve	0	346	346	0	346
Additional EPR Grant (DEFRA), transferred to EPR Reserve	(182)	182	0	0	0
Transfer Car park surplus to revenue contribution to Capital Outlay		150	150	0	150
<b>Subtotal</b>	<b>(1,251)</b>	<b>2,088</b>	<b>837</b>	<b>87</b>	<b>750</b>
<b>Net Outturn Variation</b>	<b>(2,352)</b>	<b>2,336</b>	<b>(16)</b>	<b>(97)</b>	<b>81</b>



- 2.8** Members should note that whilst the outturn forecast is favourable there remain concerns around financial performance in certain service areas – particularly services where the Council's net revenue budget is dependent on income from fees and charges.
- 2.9** Income and expenditure budgets will continue to be monitored throughout the financial year. In some instances, income budgets for 2025/26 have been adjusted downward to reflect historic underachievement of income. However, this should not be seen as a desirable outcome – more that it recognises in setting the budget for the forthcoming financial year the estimates need to be robust in the context of current financial performance.
- 2.10** The Council must ensure it can address the financial challenges arising from the Fair Funding review ("FF 2.0") and Local Government Reorganisation ("LGR") over the MTFS-period.
- 2.11** Oversight of the Vacancy Management process has been strengthened by the Corporate Leadership Team ("CLT"), with CLT authorisation required to fill a vacancy, either on a short-term or long-term basis. CLT have also reviewed the process for assessing requests for additional resources to ensure a single and consistent approach is taken to the development and appraisal of proposals and business cases.
- 2.12** As set out in paragraph 2.3 and Table ES1, the Q2 outturn forecast for the year is favourable with an increased surplus forecast at the end of the financial year.
- 2.13** The revenue budget is likely to come under further pressure in 2027/28 as the Council considers the impact from LGR and ensures services continue to be provided to residents as usual. There will be a demand on key staff to support the assessment of final proposal and plan for a new unitary structure in Gloucestershire, and implementation of the proposal from mid-2026 following the Government's decision.
- 2.14** It is expected that additional capacity will be needed to support the emerging Corporate Plan, ensure services continue to be provided to residents, and support LGR. Therefore, it is proposed to maximise the level of resources available over the next 2 years, any additional budget surplus or one-off benefit is transferred to earmarked reserves (Capacity Building) at year end, subject to the final outturn position:
- 2.15** The Q2 forecast reflects a total underspend of £0.710m within employee-related budgets for 2025/26. This is due to the Vacancy Management approach set out in the Q1 Financial Performance report:



- **Vacant** posts not yet filled, resulting in savings of £0.205m plus Positions included in the 2024/26 budget for Transformation, Learning & Organisational Development and Strategic Housing have not been appointed, generating revenue savings of £0.240m.
- Lower anticipated expenditure on **recruitment** contributing £0.096m.
- Lower costs of Phase 2 of **Publica Review** against the prudent estimate resulting in an underspend of £0.170m

In line with the strategy agreed within the Q1 report, these savings are forecast to be transferred to earmarked reserves (Capacity Building) at year end, subject to the final outturn position. Consequently, the underspends have a net nil impact on the forecast variance to budget.

**2.16** The material forecast variations are listed below with further details in Section 4 of this report.

- **Forecast income variations** – underachievement: Cemeteries (£34k), Additional Income: Licensing (£30k), Building Control (£49k), Bulky Waste (£20k)
- **Car Parks** income from car park fees above budget (£155k), permits (£29k) and penalty charge notices forecast to be £10k under budget.
- **Development Management Fees** – exceeded budget by £0.400m
- **Trinity Road Utility costs** - £37k under budget
- **Post and Printing** - costs forecast to exceed budget by £44k, predominantly within the Revenues and Benefits service.
- **Commercial Property** rental income and vacant property costs (£64k adverse variation)
- **Street Services** for the purposes of this report, it is prudent to include a £0.300m risk variation against the £0.300m savings target (increase of £0.150m from Q1).
- **Treasury Management** and interest receivable performance (£0.346m positive variation, increase of £01.57m from Q1) with £0.346m to be transferred to the Treasury Management Reserve.

**2.17** The 2025/26 pay award was agreed in July 2025 at 3.2%. The financial impact is in line with the assumption of 3% included in the 2025/26 budget and MTFS.

**2.18** A summary of the Capital Programme outturn forecast is shown in the table below.



**Table ES3 – Capital Programme Outturn Forecast**

Capital Programme	2025/26 LAB (£'000)	2025/26 Actuals to Q2 (£'000)	2025/26 Outturn (£'000)	2025/26 Outturn Variance (£'000)
Leisure & Communities	64	38	64	0
Housing/Planning and Strategic Housing	1,845	705	1,600	(245)
Environment	1,334	146	676	(658)
Retained & Corporate	0	0	0	0
ICT, Change and Customer Services	350	93	150	(200)
UK Rural Prosperity Fund	229	0	229	0
UK Shared Prosperity Fund Projects	60	16	60	0
Land, Legal and Property	672	0	200	(472)
Transformation and Investment	0	0	0	0
<b>TOTAL Capital Programme</b>	<b>4,554</b>	<b>998</b>	<b>2,979</b>	<b>(1,575)</b>

**2.19** The capital programme is a forecast underspend of £1.575m. Further details are provided in Section 6 of this report.

**2.20** Financial Performance reports will be presented to members at the March 2026 Cabinet meeting with the outturn position likely to be finalised for the July 2026 Cabinet meeting.

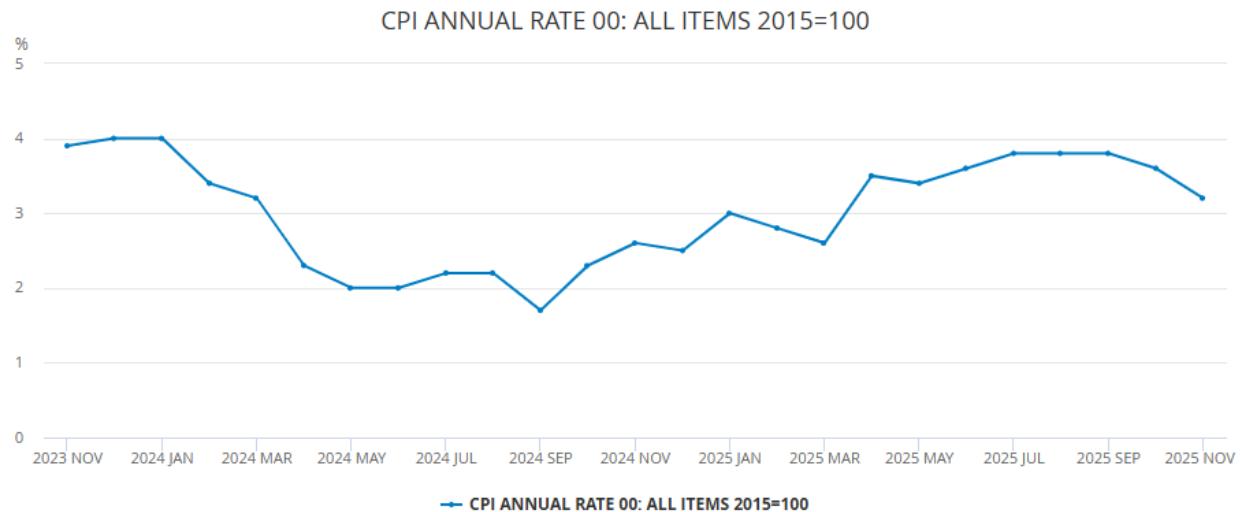
### **3. EXTERNAL ECONOMIC ENVIRONMENT**

#### **Inflationary Pressures**

**3.1** The level of inflation, as measured by the Consumer Prices Index, for November 2025 reduced to 3.2% (from 3.6% in October 2025). Although it is not the Government's preferred measure of inflation, the Retail Prices Index is 3.8% (4.3% in October 2025). Core inflation (as defined by the Office for National Statistics as the CPI Rate excluding energy, food, alcohol, and tobacco) reduced to 3.2% (3.4% in October 2025).



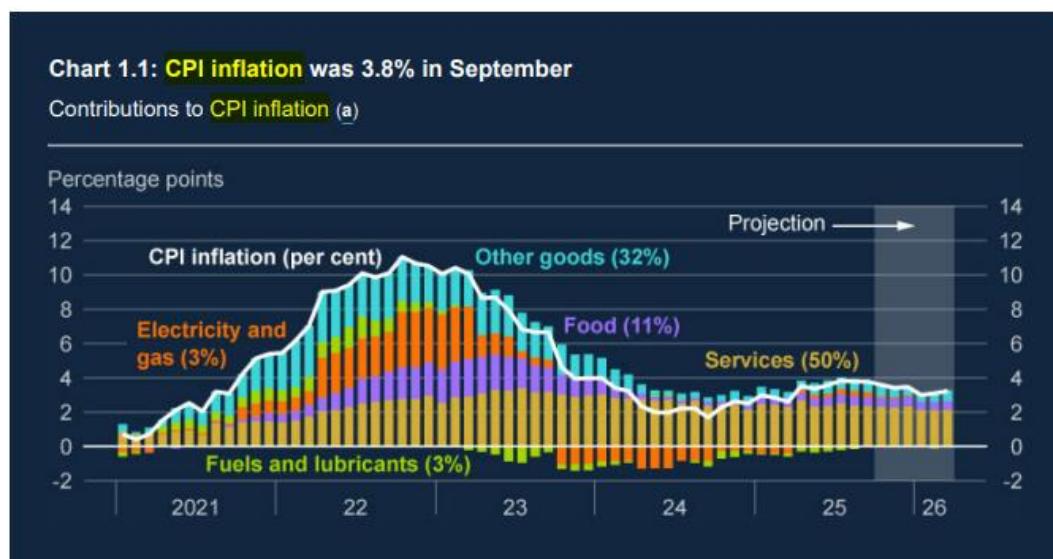
### Graph A – CPI Inflation



**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 but has fallen below CPI during 2025.

**3.3** In its November 2025 Monetary Policy Report, the Bank of England confirmed that CPI inflation is judged to have peaked and is forecast to fall close to 3% in early 2026, before gradually returning to the 2% target by mid-2027. The graph below shows the CPI forecast published in the quarterly Bank of England Monetary Policy Committee report (November 2025).

### Graph B – Bank of England Fan Chart – Inflation

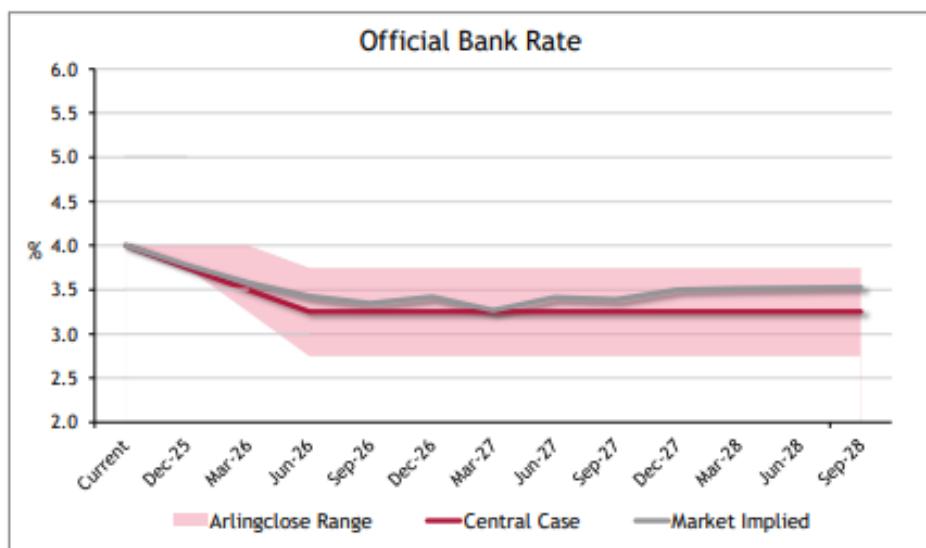




### Interest Rates

**3.4** The Bank of England reduced the Base rate in December 2025 by a further 0.25% to 3.75% commenting that the Bank felt the economy had moved beyond "the recent peak in inflation and it has continued to fall, so we have cut interest rates for the sixth time, to 3.75% today. We still think rates are on a gradual path downward. But with every cut we make, how much further we go becomes a closer call." This was widely expected following the lower inflation rate reported in December.

#### Graph C – Interest Rate Forecast (December 2025)



**3.5** 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 may need to undertake prudential borrowing.

## 4. 2025/26 REVENUE BUDGET FORECAST

**4.1** The Revenue Budget was approved by Council at their meeting on 24 February 2025 with no adjustments made during the financial year to date.



**Table 1 – Revenue Budget reconciliation**

<b>Budget Item</b>	<b>(£'000)</b>
Original Budget (Council, 24 February 2025)	15,704
Adj:	
Adj:	
Adj:	
Adj:	
<b>Latest Budget</b>	<b>15,704</b>

- 4.2** The revenue budget has been adjusted during Q2 as budgets are amended to reflect the transfer of services from Publica to the Council in Phase 2 of the Publica Transition. Whilst the net budget position (£15.704m) has not changed, the composition of the budget (i.e. subjective split between Pay and Non-Pay budgets) and net service budgets has been amended.
- 4.3** As of 30 September 2025 (Q2) the Council's net expenditure (excluding Funding and Parish Precepts) was £6.074m against the profiled budget of £6.880m
- 4.4** The forecast outturn for 2025/26 is £15.869m, with funding exceeding the budget by £0.182m due to a higher-than-budgeted allocation of the Extended Producer Responsibility (EPR) grant. This results in a net favourable variance of £0.016m against the net budget.
- 4.5** Table 2 provides Members with an overview of the material outturn variations forecast across services, while Table 3 details the non-service revenue expenditure and income budgets.



**Table 2 – Revenue Budget Outturn Forecast Summary**

Revenue Budget	2025/26 Latest Net Budget (£'000)	2025/26 Profiled Budget to Q2 (£'000)	2025/26 Actuals to Q2 (£'000)	2025/26 Outturn Forecast (£'000)	2025/26 Outturn Variance (£'000)
Environmental & Regulatory Services	695	360	312	616	(79)
Business Sup. Svcs - Finance, HR, Procurement	1,425	807	808	1,418	(7)
ICT, Change & Customer Services	2,502	1,176	1,181	2,492	(10)
Assets, Property & Regeneration	838	501	385	686	(152)
Public Executives and Modernisation	104	51	51	104	0
Revenues & Housing Support	842	470	463	808	(34)
Environmental Services	4,761	2,018	1,841	4,548	(213)
Leisure & Communities	2,359	318	232	2,283	(75)
Planning & Strategic Housing	1,682	(103)	(445)	1,209	(473)
Democratic Services	1,366	657	585	1,318	(47)
Retained and Corporate	2,593	1,102	1,365	2,715	122
<b>Subtotal Services</b>	<b>19,165</b>	<b>7,358</b>	<b>6,779</b>	<b>18,197</b>	<b>(968)</b>
Less: Reversal of accounting adjustments	(1,925)		0	(1,925)	0
<b>Revised Subtotal Services</b>	<b>17,240</b>	<b>7,358</b>	<b>6,779</b>	<b>16,272</b>	<b>(968)</b>
Corporate Income & Expenditure	(1,537)	(478)	(704)	(404)	1,133
Provisions and Risk Items	0	0	0	0	0
<b>Net Budget Requirement</b>	<b>15,704</b>	<b>6,880</b>	<b>6,074</b>	<b>15,869</b>	<b>165</b>
<b>Funded by:</b>					
Council Tax	(7,065)	0	0	(7,065)	0
Retained Business Rates	(5,117)	2,402	2,403	(5,117)	0
Government Funding - Grants	(2,527)	(632)	(635)	(2,527)	0
Government Funding - NHB	(820)	(205)	(205)	(820)	0
Extended Producer Responsibility (EPR)	(1,502)	0	0	(1,683)	(181)
Collection Fund (surplus) / Deficit	689	0	0	689	0
<b>TOTAL Funding</b>	<b>(16,342)</b>	<b>1,565</b>	<b>1,563</b>	<b>(16,523)</b>	<b>(181)</b>
<b>Budget shortfall/(surplus)</b>	<b>(638)</b>		<b>7,637</b>	<b>(654)</b>	<b>(16)</b>

**Table 3 – Corporate Income and Expenditure**

Corporate Income and Expenditure	2025/26 Latest Net Budget (£'000)	2025/26 Actuals to Q2 (£'000)	2025/26 Outturn Forecast (£'000)	2025/26 Outturn Variance (£'000)
Savings & Contingency and non service income and exp	598	(28)	288	(310)
Treasury Management - Interest Payable	5	2	5	0
Treasury Management - Interest Receivable	(1,303)	(678)	(1,649)	(346)
Minimum Revenue Provision (MRP)	9	0	9	0
Revenue Contribution to Capital Outlay (RCCO)	0	0	150	150
Transfer to/(from) Earmarked Reserves	(846)	0	793	1,639
	<b>(1,537)</b>	<b>(704)</b>	<b>(404)</b>	<b>1,133</b>



**4.7** As outlined, the forecast outturn position is a net underspend/favourable variance of £0.016m, although this is a reduction in the reported forecast outturn since Q1 it includes proposed transfers of a number of forecast underspends outlined in 4.13 below.

**4.8** The Council must ensure it can address the financial challenges arising from the Fair Funding review ("FF 2.0") and Local Government Reorganisation ("LGR") over the MTFS-period.

**4.9** Oversight of the Vacancy Management process has been strengthened by the Corporate Leadership Team ("CLT"), with CLT authorisation required to fill a vacancy, either on a short-term or long-term basis. CLT have also reviewed the process for assessing requests for additional resources to ensure a single and consistent approach is taken to the development and appraisal of proposals and business cases.

**4.10** As set out in paragraph 2.3 and Table ES1, the Q2 outturn forecast for the year is favourable with an increased surplus likely at the end of the financial year.

**4.11** 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 the final proposal and plan for a new unitary structure in Gloucestershire, and implementation of the proposal from mid-2026 following the Government's decision.

**4.12** It is anticipated that additional capacity will be required to support delivery of the emerging Corporate Plan, maintain continuity of services for residents, and prepare for Local Government Reorganisation (LGR). To achieve this, it is proposed to maximise the resources available over the next two years by transferring any additional budget surplus or one-off benefits to earmarked reserves (Capacity Building) at year-end, subject to the final outturn position.

**4.13** This report assumes that the following underspends will be transferred to the Capacity Building earmarked reserve:

- £0.205m savings from vacancy management plus £0.240m new posts included in the 2025/26 budget
- £0.266m underspend against the forecast impact of Publica Phase 2

This results in a total transfer of £0.710m to the Capacity Building earmarked reserve.



**4.14** This assumes that there are no additional expenditure commitments that would require support from the Financial Resilience Reserve (FRR). For the avoidance of doubt, the working assumption in the outturn forecast is:

- there is no material deterioration in the outturn forecast in Q3-Q4.
- additional expenditure in any particular service area is offset by a corresponding decrease in expenditure in other service areas.

### **Key Variations**

**4.15** The material items which have had an impact on the Council's revenue budget are summarised below with narrative explaining the reasons(s) for the variation in the paragraphs that follow.

**4.16** For the purposes of this report a risk provision of £0.300m has been included against the cost reduction of £0.300m included in the 2025/26 revenue budget for the **Street Cleaning**. Initial scoping work has identified cost reductions and service efficiencies; a wider review of service options is being undertaken to ensure service standards are clearly defined with corresponding cost reductions. Following a review of service operations by APSE (Association of Public Service Excellence), and options for cost reduction are being reviewed and tested ahead of any decision on service design.

**4.17** Where income shortfalls have been forecast, it is expected that Business Managers and Assistant Directors evaluate options for corrective action. The evaluation must include an assessment of the service cost and income, market positioning, and unit cost and benchmarking data analysis. Options should outline, if possible, how the service can be financially sustainable.

**4.18 Cemetery fees** – forecast shortfall in income of £34k (£38k Q1) due to continued lower service use in Q2. Whilst this position may change in the second half of the year, it is prudent for budget monitoring purposes to include the variation.

**4.19 Licensing income** – is forecast to exceed budget by £30k largely in respect of taxi drivers' licences. (£16k at Q1)

**4.20 Development Management fees** - overachievement of planning fees by £0.341m at Q2. This includes £0.776m of Planning Fees (28 Major and 953 Other) (budget of £0.437m) £0.074m of Pre-Application fees (230), (budget of £0.071m). 619 non-fee applications have also been processed.

**4.21** The service has overachieved in planning application fee income as a result of a series of major housing and other developments that came forward within the first half of the financial year. Following the changes to the National Planning Policy



Framework in December 2024, the Council can no longer demonstrate a 5-year housing land supply. This has resulted in a number of speculative housing developments coming forward in during the first half of 2025/26:

- 195 dwellings in Moreton-In-Marsh
- 98 dwellings in Fairford (approved in September 2025)
- 120 dwellings in Mickleton
- Solar farm near Siddington.

**4.22** Whilst it is difficult to forecast whether this increase in major developments will continue, the team are receiving a number of pre-application enquiries relating to other potential future developments. There is a strong likelihood that further schemes will come forward throughout the rest of the financial year if a number of these pre-applications progress to full application stage.

**4.23** This increase in planning applications (and associated income from fees) for major housing developments does bring additional risks. As a large number of these schemes are speculative, it is likely that a number will be refused permission and will therefore result in appeals. Given the scale of development, there is a high chance appeals are dealt with as informal hearings or inquiries which bring greater costs to the Council. Planning permission was refused in July 2025 for 54 dwellings in Lechlade, which is likely to result in an appeal submission in late 2025/early 2026.

**4.24** **It was approved in principle at the September 2025 Cabinet meeting to hold 50% of the forecast additional income as a risk provision. This will have the effect of reducing the net variation during the financial year. Due to the favourable position reported at Q2 and subject to the final outturn position for Development Management Fees remaining positive (i.e. income received in the year is above the budgeted level), it is proposed that 100% of the variation is transferred to the Planning Appeals reserve.**

**4.25** The Council is not expected to achieve the budgeted level of commercial rental income from its **Investment Properties** due to ongoing economic challenges in the retail and office sectors, which are exerting downward pressure on rents. A forecasted income shortfall of £0.064m is forecast primarily related to the out-of-district investment property (former Wilko's store in Great Bridge, Tipton). A lease agreement with a new tenant was agreed earlier in the calendar year, with occupation commencing in July 2025 following completion of fit-out. In common with most commercial lettings, the lease agreement includes a six-month rent-free



period. The variation arises due to the new lease commencing later than anticipated than the budget assumption, and additional empty property costs over the time period.

**4.26** Following the installation of Solar PV at Trinity Road and rental income from the **tenanted areas of Trinity Road Offices**, the Council is forecast to achieve £0.045m, in income for 2025/26. This represents an excess of £0.020m above the budgeted target of £0.025m. Live data dashboards provide updates on occupancy and enquiries, supporting proactive management. Formal quarterly performance meetings continue to monitor process. Current occupancy: 50% of offices let and 35% of available desks occupied.

**4.27** Income from the Council's **Car Parks** has continued to perform positively in the first half of 2025/26 with income forecast to exceed budget by £0.156m. Income from Car park permits is also expected to exceed budget by £0.029m whilst Penalty Charge Notices (PCNs) is forecast to be £0.011m below target, income budgets for 2025/26 were reduced to reflect current financial performance and ensure the budget estimates approved by Council in February 2025 were robust. The Council's Car Parking Strategy 2025-2028 and action plan, approved and adopted by Cabinet in November 2025 included a recommendation to consider strengthening enforcement resources to match the needs of the district.

**4.28** The car park expenditure budget includes a forecast underspend of £0.026m, primarily relating to costs such as repairs and maintenance, contractors fees for card charges and parking and permit software charges.

**4.29 Building Control** – The first half of 2025/26 has seen a notable improvement in performance compared to 2024/25. Market share is averaging 71% up to the end of Q2, with 294 applications processed, representing a 12% increase in market share compared to the same period last year. Application volumes remain steady, with only a slight year-on-year increase of 12 applications. Income has exceeded the budget by £0.039m to date. Building regulation fees were increased for the 2025-26 financial year to better reflect the cost of running the service. Forecast income outturn is currently reported as being £0.060m above budget. Expenditure is forecast to be overspend by £0.011m due to audit fees arising from the Building Safety regulator. Despite this expenditure pressure, the service is forecasting a net favourable variance of £0.049m.



**4.30 Public Conveniences** – Income from public conveniences charges is currently in line with the approved budget. Charging has been implemented at ten of the eleven public conveniences across the district, including Chipping Campden, Tetbury and Lechlade from August 2025. Further options will need to be explored during 2025/26 to minimise or eliminate entirely the net subsidy required to operate these facilities of £0.164m for 2025/26 (excluding depreciation and assumes income of £0.110m from fees). The public conveniences in Northleach where no charge is currently applied, are scheduled to transfer to Northleach and Eastington Town Council from 1st April 2026, subject to an agreement and the provision of a one-off grant of £0.008m.

**4.31 Land Charges** – income is on target, at Q2 (£0.091m). Application volumes have seen a notable increase in the first half of 2025/26, with 843 searches received, compared to 750 in Q1 2024/25. This represents a 12% year-on-year rise, significantly above the typical average for this point in the year of around 680 applications.

**4.32 Green Waste** fees are expected to achieve budgeted income of £1.588m by the third quarter of the 2025/26 financial year, income is (£0.007m) below the profiled budget at Q2.

**4.33** Despite an increase in budget of £0.030m in 2025/26, Expenditure in respect of **postage and printing** within the revenues and benefits service is forecast to be overspent by £0.044m by the end of the financial year. This includes 4,708 letters sent out as part of the LIFT project and increases in pricing. Additional analysis will be required as part of the 2026/27 budget setting process and to understand the position and analyse the cost pressure arising from the additional work associated with the LIFT project.

**4.34 Ubico Contract** – the Council's Environmental (grounds maintenance, street cleaning, domestic waste collection, recycling collections etc) are provided by Ubico Ltd. The contract with Ubico for 2025/26 of £8.863m is forecast to cost £8.932m – an adverse variation of £0.069m. This is predominantly due to additional costs of £0.099m due to higher than estimated vehicle hire and repair costs (£0.073m) and higher employee costs caused by high levels of sickness in waste and recycling, offset by vacancies within street cleaning (£0.041m). These pressures have been partially mitigated by lower diesel costs due to favourable pump prices compared to budget (£0.057m). Officers will work closely with Ubico to ensure the service should be



delivered within the contract sum and the forecast overspend should be mitigated/absorbed elsewhere within the contract. The table below provides members with an overview of the financial performance of the Ubico Contract (table 5).

**Table 5 – Ubico Contract Monitoring**

<b>Waste, Recycling, Street Cleaning and Grounds Maintenance Services</b>	<b>Ubico Contract Costs OB (£'000)</b>	<b>Ubico Contract Costs CS (£'000)</b>	<b>Forecast Outturn (£'000)</b>	<b>Forecast Outturn Variance (£'000)</b>
Car Parks GM [CTW668]	68	68	63	(5)
CCM001 Cemetery/Churchyards GM [CTW688]	166	166	154	(11)
RYC002 Garden Waste Collection [CTW634]	1,310	1,310	1,321	12
WST001 Household Waste [CTW611]	1,844	1,844	1,857	13
RYC001 Recycling [CTW633]	3,340	3,340	3,408	68
RYC003 Refuse/Recycling/Food Waste [CTW635]	732	732	742	11
STC001 Street Cleaning [CTW666]	1,387	1,387	1,369	(18)
Trinity Road Offices GM [CTW668]	17	17	16	(1)
<b>Grand Total</b>	<b>8,863</b>	<b>8,863</b>	<b>8,932</b>	<b>69</b>
<b>Net variation on contract</b>				

### **Treasury Management**

**4.35** Dividends from the Council's longer-term investments (Pooled funds and Real Estate Investment Trusts) of £0.215m were received in the six months to the 30 September 2025 year achieving a return of 4.23%. Interest from short term cash deposits including the Debt Management Office (DMO) was £0.432m due to higher surplus balances and interest rates remaining at a higher level than assumed in the budget and MTFS.

**4.36** It should be noted that the budgeted level of net investment income for 2025/26 is £1.208m – a decrease of £0.077m over the 2024/25 budgeted level and recognises the current interest rate position. This is a prudent estimate for the year and is lower than the final 2024/25 level of investment income achieved of £1.621m given the forecast interest rate reductions over the financial year.



**4.37** It is not expected that the current interest rate level will be maintained over the MTFS period, as set out in Section 3 of this report, with expectations of investment income in 2026/27 reducing to around £1.0m with a further reduction to £0.500m by 2027/28.

**4.38** A prudent forecast of investment income has been included in the outturn forecast of £1.484m. This includes the expectation that the base rate would be reduced in December 2025 to 3.75%. This results in a £0.346m positive variance against budget and subject to the outturn position at year end will be transferred to the Treasury Management risk reserve to mitigate any potential losses on pooled funds or borrowing costs in the future.

**4.39** The level of investment income for the year will depend on the performance of both short-term investments (Money Market Funds, deposits with the DMO) and dividends from the long-term investment. The table below provides members with a high-level overview of the Council's Treasury Management investments on 30 September 2025.

**Table 6 – Treasury Management Investments**

<b>Investment type</b>	<b>Balance invested at 30/09/25 (£'000)</b>	<b>Investment Income received to 30/09/25 (£'000)</b>	<b>2025/26 Forecast (£'000)</b>
Bank of England DMDAF	10,000	222	574
<b>Money Market Funds</b>			
Federated Money Market Fund	3,000	64	132
DGLS Money Market Fund	3,000	64	132
Insight Liquidity Money Market Fund	3,000	58	124
Lloyds Instant Access	265	11	21
Santander Call Account	1	-	1
Other Short-term deposits	-	13	13
<b>Real Estate Investment Trusts (REIT)</b>			
Fundamentum Housing REIT	650	8	30
<b>Cash Plus Fund</b>			
Federated Cash Plus Fund <sup>1</sup>	1,239	-	-

<sup>1</sup> Investment income is reinvested into the funds' capital value rather than distributed as dividends.



<b>Pooled Funds</b>			
CCLA Property Fund	2,199	25	95
Shroders Income Maximiser Fund	922	36	54
CCLA Cautious Multi Assets Fund	926	11	30
M&G UK Income Fund	1,943	54	104
Ninety-One Investec Diversified Fund	1,848	38	88
Columbia Threadneedle Bond Fund	1,959	43	86
	<b>30,952</b>	<b>647</b>	<b>1,484</b>

**4.40** Council approved the Capital Strategy and the Treasury Management Strategy (including the Non-Treasury Management Investment Strategy) at their meeting on 24 February 2025. Audit and Governance Committee have responsibility for reviewing and monitoring treasury management arrangements in accordance with the CIPFA Treasury Management Code and receiving performance reports. The Council adopted the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice (the CIPFA Code) which requires the Council to approve, as a minimum, treasury management semi-annual and annual outturn reports.

**4.41** The CIPFA Code was updated in 2021 and includes the mandatory requirement, from 01 April 2023, of quarterly reporting of the treasury management prudential indicators. The non-treasury prudential indicators are expected to be included in the Council's usual revenue and capital monitoring reports. Section 6 and **Annex B** of this report provide members with an overview on the non-treasury position.

### **Corporate Income and Expenditure, Provisions, and Risk**

**4.42** As outlined in Tables 3 and 4 there are variations forecast across the Corporate Income and Expenditure budgets. These budgets support the General Fund Revenue budget and are typically the non-service items such as Treasury Management, financing, contingency budget, and provisions for risk.

**4.43** As outlined earlier in the report, a risk provision of £0.300m has been included in the outturn forecast to cover an expected shortfall against the Street Cleaning savings target of £0.300m.



**4.44** As outlined earlier in this section, the performance of the Council's Treasury Management Investments is a result of higher than anticipated interest rates and surplus balances to invest.

## **5. PUBLICA REVIEW**

**5.1** Council approved the Detailed Transition Plan for Phase 2 of the transition of services from Publica at their meeting in March 2025. The 2025/26 revenue budget included provision for increased cost of services estimated at £0.225m (£0.300m full-year impact) as per the MTFS report, with the DTP revising the estimate to £0.245m.

**5.2** The TUPE transfer of staff to the Council was completed in July 2025 with the following services transferring.

- Property and Estates
- Waste Contract Management
- Leisure Contract Management
- Projects and Project Management
- Human Resources Business Partner

**5.3** The in-year cost is forecast to be lower than the budgeted amount due to a number of vacancies transferring to the Council. At Q2, there is a forecast net underspend of £0.170m against the £0.225m provision, reflecting both vacancies and service costs being lower below budget assumptions.

**5.4** The cost for the Council's share of redundancy and pension strain costs for Phase 2 is £0.171m, within the amount set aside within the Financial Resilience reserve and Publica Review Reserve (£0.300m).

## **6. CAPITAL PROGRAMME**

**6.1** Council approved the Capital Programme for 2025/26 at their meeting on 24 February 2025. The Capital Programme has been updated to reflect adjustments as set out in Table 8 below and was approved by Cabinet in July 2025.

**6.2** The capital programme for 2025/26 is £4.592m with a total net spend of £0.998m as at 30 September 2025.

**Table 7 – Capital Programme budget reconciliation**



<b>Capital Programme Reconciliation</b>	<b>(£'000)</b>
Original Budget (Council February 2025)	<b>4,027</b>
Slippage from 2024/25 (Cabinet 10 July)	<b>565</b>
Reallocation of the UKSPF capital budget (£0.327m) as follows: -£0.229m to Rural England Prosperity Fund -£0.060m to UK Shared Prosperity Fund (UKSPF capital) in line with agreed allocations. This results in a net reduction of £0.038m, in line with agreed allocations.	<b>(38)</b>
<b>Latest Budget</b>	<b>4,554</b>

**Table 8 – Capital Programme Outturn Forecast**

<b>Capital Programme</b>	<b>2025/26 OB (£'000)</b>	<b>Slippage From 2024/25 (£'000)</b>	<b>2025/26 Adjs (£'000)</b>	<b>2025/26 LAB (£'000)</b>	<b>2025/26 Actuals to Q2 (£'000)</b>	<b>2025/26 Outturn (£'000)</b>	<b>2025/26 Variance (£'000)</b>
Leisure & Communities	0	64	0	64	38	64	0
Housing/Planning and Strategic Housing	1,718	127	0	1,845	705	1,600	(245)
Environment	1,132	202	0	1,334	146	676	(658)
Retained & Corporate	0	0	0	0	0	0	0
ICT, Change and Customer Services	350	0	0	350	93	150	(200)
UK Rural Prosperity Fund	0	0	229	229	0	229	0
UK Shared Prosperity Fund Projects	327	0	(267)	60	16	60	0
Land, Legal and Property	500	172	0	672	0	200	(472)
Transformation and Investment	0	0	0	0	0	0	0
<b>TOTAL Capital Programme</b>	<b>4,027</b>	<b>565</b>	<b>(38)</b>	<b>4,554</b>	<b>998</b>	<b>2,979</b>	<b>(1,575)</b>

**6.3** The outturn forecast for the current year is an underspend of £1.575m (£0.320m at Q1). **Annex A** sets out the detailed forecast outturn with commentary from budget holders and is summarised in Table 9 above.

**6.4** The significant variations forecast on the Capital Programme are:

- **Asset Management Strategy** - A forecast underspend of £0.472m is anticipated, primarily due to planned roof works at Abberley House being deferred to 2026/27. The delay reflects the need to align the works with the wider asset management and funding will be reprofiled in the 2026/27 capital programme.



- **Private Sector Housing Renewal (Disabled Facilities Grant)** - Estimated that the annual expenditure will be approximately £1.6m resulting in an underspend of £0.175m.
- **Provision for financing of Ubico Vehicles** – underspend of £0.573m forecast against budget. The unspent budget relates to two stillage vehicles and a cage vehicle included on the capital fleet replacement programme which are still required but have not been procured to date at an estimated cost of £0.479m. This budget will be carried forward to 2026/27 subject to approval.
- **Bromford Joint Venture - (£0.070m)** Planning consent was granted on the 12 March, However Bromford need to resolve issues around drainage which is delaying the commencement of the work. This may delay commencement of works until 2027 unless Thames Water will bring their upgrade plans forward.
- **Replacement/Upgrade of Pay and Display Machines (£0.125m)** – Although the tendering process for a new supplier has commenced. Installation not expected until 2026/27, it was noted as part of the Car Parking Strategy approved and adopted by Cabinet (November 20<sup>th</sup> 2025) that a further £40,000 will be allocated to the 2026/27 capital programme and that the intention is to finance the replacement of the car park ticket machines from the additional car park fee income forecast for 2025/26.
- **Public Conveniences** – Accelerated rollout of payment devices including new doors at West Street (Tetbury), Chipping Campden, Lechlade, Northleach, and replacement paddle gates at the two facilities in Bourton-on-the-Water (Rislington Road and Church Rooms). Additional spend of £0.050m will be funded from capital receipts.
- **Planning Documents and Scanning Solution** – Planning Service and ICT are scoping improvements to the IDOX system as part of wider service transformation agenda to focus on delivering services efficiencies through ICT. Implementation not expected until 2026/27. Budget to be carried forward subject to approval. (£0.200m)
- **In cab technology (Street Cleaning)** – Project slippage means that this budget is likely to be carried forward to 2026/27 subject to approval. (£0.060m)

**6.5** At their meeting on 31 October 2023 Overview and Scrutiny Committee recommended that the Capital Programme should be kept under review to ensure



the revenue impact of capital expenditure and financing decisions were fully considered.

### **Capital Receipts and Disposals**

**6.6** There has been one asset disposal during the second quarter of the financial year, the sale of Memorial Cottages completed in Q2 generating a capital receipt of £0.248m. Total receipts of £0.605m received in the 2025/26 financial year to date, no further receipts are forecast.



**Table 9 – Capital Financing Forecast**

<b>Capital Financing Statement</b>	<b>2025/26 OB  (£'000)</b>	<b>Slippage From 2024/25  (£'000)</b>	<b>2025/26</b>	<b>2025/26</b>	<b>2025/26</b>	<b>2025/26 Outturn Variance  (£'000)</b>
			<b>Adjs  (£'000)</b>	<b>LAB  (£'000)</b>	<b>Outturn  (£'000)</b>	
Capital receipts	2,052	221	0	2,273	907	(1,366)
Capital Grants and Contributions	1,975	251	(38)	2,188	1,979	(209)
Earmarked Reserves	0	0	0	0	0	0
Revenue Contribution to Capital Outlay (R)	0	0	0	0	0	0
Community Municipal Investments (CMI)	0	93	0	93	93	0
Prudential Borrowing	0	0	0	0	0	0
	<b>4,027</b>	<b>565</b>	<b>(38)</b>	<b>4,554</b>	<b>2,979</b>	<b>(1,575)</b>

**6.7** The Capital Financing position set out in the table above will be reviewed by the s151 Officer as part of the financial year end closedown process as expenditure forecasts are updated to ensure a balanced use of capital resources and mitigation of current and future interest rates.

## **7. NON-TREASURY MANAGEMENT SUMMARY**

**7.1** The CIPFA Code was updated in 2021 and includes the requirement, mandatory from 01 April 2023, of quarterly reporting of the treasury management prudential indicators. The non-treasury prudential indicators are expected to be included in the Council's usual revenue and capital monitoring reports.

### **Prudential Indicators**

**7.2** The detailed Non-Treasury Management prudential indicators are included in **Annex B** with the commentary below providing members with a high-level summary.

**7.3** Whilst there is no underlying need to borrow with the Capital Programme financed through internal resources and external grants and contributions, any additional capital expenditure proposed during the year will need to consider the availability and cost of capital financing. The mid-year Treasury Management reported to Audit and Governance Committee sets out the wider impact on the Capital Financing Requirement.

## **8. RISKS AND UNCERTAINTIES**

**8.1** The report outlines several risks and uncertainties around the wider economic environment and achieving the Street Service savings of £0.300m.



**8.2** A further risk has been identified concerning the additional Development Management fees received in the first half of the financial year and the forecast for the financial year. With an increase in speculative applications, it is prudent to set aside 50% of any potential additional income against planning appeals.

## **9. CONCLUSIONS**

**9.1** Members should note that whilst the outturn forecast is favourable there remain concerns around financial performance in certain service areas – particularly services where the Council's net revenue budget is dependent on income from fees and charges.

**9.2** Income and expenditure budgets will continue to be monitored throughout the financial year. In some instances, income budgets for 2025/26 have been adjusted downward to reflect historic underachievement of income. However, this should not be seen as a desirable outcome – more that it recognises in setting the budget for the forthcoming financial year the estimates need to be robust in the context of current financial performance.

**9.3** The Council must ensure it can address the financial challenges arising from the Fair Funding review ("FF 2.0") and Local Government Reorganisation ("LGR") over the MTFS-period.

**9.4** Oversight of the Vacancy Management process has been strengthened by the Corporate Leadership Team ("CLT"), with CLT authorisation required to fill a vacancy, either on a short-term or long-term basis. CLT have also reviewed the process for assessing requests for additional resources to ensure a single and consistent approach is taken to the development and appraisal of proposals and business cases.

**9.5** As set out in paragraph 2.3 and Table ES1, the Q2 outturn forecast for the year is favourable with an increased surplus likely at the end of the financial year.

**9.6** The revenue budget is likely to come under further pressure in 2026/27 and 2027/28 as the Council considers the impact from LGR and ensures services continue to be provided to residents as usual. There will be a demand on key staff to support the assessment of final proposal and plan for a new unitary structure in Gloucestershire, and implementation of the proposal from mid-2026 following the Government's decision.



- 9.7** 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 was recommended and approved in principle at the September 2025 Cabinet meeting 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 (Capacity Building), subject to the final outturn position.
- 9.8** The increase in major planning applications (and associated income from fees) for housing developments does bring additional risks. As a large number of these schemes are speculative, it is likely that a number will be refused permission and will therefore result in appeals. Given the scale of development, there is a high chance appeals are dealt with as informal hearings or inquiries which bring greater costs to the Council. Planning permission was refused in Q1 for 54 dwellings in Lechlade, which is likely to result in an appeal submission in late 2025/early 2026.
- 9.9** At its September 2025 meeting, Cabinet approved in principle the allocation of 50% of the forecast additional income as a risk provision to mitigate financial volatility by reducing net variation during the year. Subject to the final outturn for Development Management Fees remaining positive—i.e., income exceeding the budgeted level—it was agreed that 50% of the resulting variation would be transferred to the Planning Appeals Reserve. Following the Q2 review, and given the favourable forecast outturn position, it is now recommended that 100% of income in excess of budget be transferred to the Planning Appeals Reserve, as set out in recommendation 2.
- 9.10** This monitoring report provides an update on the Council's financial position. As outlined in the report, the forecasted favourable outturn will enable a transfer of £0.710m from underspends related to recruitment, vacancies, and the Publica review costs to the Capacity Building Reserve at year-end. This transfer will support capacity-building initiatives in preparation for Local Government Reorganisation (LGR).

## **10. FINANCIAL IMPLICATIONS**

- 10.1** The detailed financial implications are set out in the report.

## **11. LEGAL IMPLICATIONS**

- 11.1** Under Part 2 Local Government Act 2003, the Council must, from time to time during the year review the calculations it has used to set its budget. The Council's Chief Financial Officer is required to report to the Council on the robustness of estimates



made for the purposes of calculating the annual budget, and on the adequacy of proposed financial reserves. Members must have regard to that report when making decisions about the calculations in connection with which it is made.

## **12. RISK ASSESSMENT**

**12.1** Section 8 of the report set out the material risks and uncertainties.

## **13. EQUALITIES IMPACT**

**13.1** None

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

**14.1** None

## **15. BACKGROUND PAPERS**

**15.1** None

(END)

Annex A - Capital Programme 2025/26 - Q.2									
Capital Programme by Service Area	2025/26 Budget [Incl. 24/25 slippage] (£'000)	2025/26 Schemes approved in-year (£'000)	2025/26 Revised Budget (£'000)	2025/26 Actuals to Q.2 (£'000)	2025/26 Variance to Q.2 (£'000)	2025/26 Committed Expenditure (£'000)	2025/26 Forecast Out-Turn Variance (£'000)		Commentary
Spa pool - Bourton Leisure Centre	34	0	34	28	(6)	6	0		Repair works to address a leak began in September. The initial leak was successfully located and fixed. However, during the process, a secondary leak was discovered. Due to the complexity of locating this second leak, contractors were unable to proceed further. The project is currently on hold while quotes are being obtained for the additional work required to resolve the issue.
Crowdfund Cotswold	30	0	30	10	(20)	0	0		Expenditure to date is for funds being held by Cotswolds funding platform partner, Spacehive, for projects approved but not yet completed.
Housing/Planning and Strategic Housing									
Private Sector Housing Renewal Grant (DFG)	1,775	0	1,775	705	(1,070)	0	(175)		At Q.2 it is estimated that the annual expenditure will be approx. £1.6m. The initial impact of Gloucestershire County Council [GCC] using external occupational therapy [OT] agency to clear the waiting list for adaptations has settled. It is not anticipated that Cotswold will be in a waiting list situation again this financial year.
Bromford Joint Venture Partnership	70	0	70	0	(70)	0	(70)		Unlikely to be required in 2025/26 due to slippage on wider programme by Bromford (drainage requirements Thames Water).
Environment									
Waste & Recycling receptacles	82	0	82	63	(19)	0	0		Rolling budget for the purchase of waste receptacles due to growth in properties or replacements.

Capital Programme by Service Area	2025/26 Budget [Incl. 24/25 slippage] (£'000)	2025/26 Schemes approved in-year (£'000)	2025/26 Revised Budget (£'000)	2025/26 Actuals to Q.2 (£'000)	2025/26 Variance to Q.2 (£'000)	2025/26 Committed Expenditure (£'000)	2025/26 Forecast Out-Turn Variance (£'000)	Commentary
Provision for financing of Ubico Vehicles	790	0	790	19	(771)	248	(523)	This budget is to fund the Capital Fleet Replacement Programme for Ubico. It was approved during 2025/26 to also fund the installation of a vehicle ramp at Packers Leaze Depot, South Cerney. The installation was completed during Q.1.
Fuel Bunkering (Ubico)	60	0	60	0	(60)	0	0	Procurement to replace 5 x 3.5 tonne cage vehicles has been undertaken and vehicles are expected to be delivered by the end of this financial year. The remaining unspent budget relates to two stillage vehicles and a cage vehicle included on the capital fleet replacement programme which are still required but have not been procured to date at an estimated cost of £0.479m. This budget will be carried forward to 2026/27 subject to approval.
In cab technology (Street Cleaning)	60	0	60	0	(60)	0	(60)	The business case is being reviewed in light of Local Government Reorganisation [LGR]. Discussions with members and officers are ongoing around the feasibility of this project.
On Street Residential Chargepoint Scheme (ORCS)	183	0	183	0	(183)	183	0	Project slippage. Budget to be carried forward to 2026/27 as part of 2026/27 budget setting process, subject to approval.
Public Toilets - Card Payment (bc)	34		34	64	30	20	50	The network of EVCPs has been expanded to include West Street, Tetbury, Old Market Way in Moreton-in marsh and Maugersbury Road in Stow-on-the-wold. There are 14 sockets available for use. A further 10 sockets are being installed in Brewery car park in Cirencester. A safety issue has emerged at the site which the suppliers are due to address before the sockets are safe to use. It is expected that they will be fully operational during the final quarter of the financial year
Replace/Upgrade Pay and Display machines	125	0	125	0	(125)	0	(125)	Installation of payment mechanisms and new doors at West Street (Tetbury), Chipping Campden, Lechlade, Northleach, and replacement paddle gates at Rissington Road and Church Rooms completed in Q2.
<b>Retained and Corporate:</b>								The tendering process for a supplier of new equipment has commenced. Replacement/upgrade is likely to slip into 2026/27 and is expected to cost £0.165m.

Capital Programme by Service Area	2025/26 Budget [Incl. 24/25 slippage] (£'000)	2025/26 Schemes approved in-year (£'000)	2025/26 Revised Budget (£'000)	2025/26 Actuals to Q.2 (£'000)	2025/26 Variance to Q.2 (£'000)	2025/26 Committed Expenditure (£'000)	2025/26 Forecast Out-Turn Variance (£'000)	Commentary
<b>ICT, Change and Customer Services</b>								
ICT Capital								
ICT Capital	150	0	150	93	(57)	0	0	Expenditure on Civica software to ensure PCI-DSS compliant and service charges and the ongoing laptop replacement programme. Upgrade of Council Chamber audio/visual equipment including microphones, licences and MS Teams link. Funding from ICT reserve.
Planning Documents and Scanning Solution	200	0	200	0	(200)	0	(200)	Planning service and ICT are scoping improvements to the IDOX system as part of a wider service transformation agenda to focus on delivering service efficiencies through ICT. No expenditure during the current financial year. Budget expected to be carried forward subject to approval of the 2026/27 budget and MTFS.
Council Chamber	0	0	0	19	19	0	0	Upgrade of Council Chamber audio/visual equipment including microphones, licences and MS Teams link. Funding from ICT reserve.
<b>UK Prosperity schemes:</b>								
UK Shared Prosperity Fund Projects	327	-267	60	16	(44)	44	0	The UKSPF funding is now fully committed following an open application process and is expected to be spent in full before the end of the financial year.
Rural England Prosperity Fund	0	229	229	0	(229)	218	0	The REPF funding is now fully committed following an open application process and is expected to be spent in full before the end of the financial year.
<b>Land, Legal and Property</b>								
Asset Management Strategy	672	0	672	0	(672)	0	(472)	Abberley House roof works expected to begin Q1 26/27, minimal spend of £30k in Q4 25/26. Lift quotes for Cirencester Leisure Centre still being obtained, potential for works to start in Q4 25/26, at £80k. Works/replacement of the two lifts at the Museum will not take place until 26/27 Other potential work includes lighting improvements in Tetbury car park and Dingley Dell car park.
	4,592	-38	4,554	1,017	(3,537)	719	(1,575)	

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## **ANNEX B**

### **NON-TREASURY MANAGEMENT PRUDENTIAL INDICATORS**

#### **I. BACKGROUND**

**1.1** The Council measures and manages its capital expenditure, borrowing and commercial and service investments with reference to the following indicators. It is now a requirement of the CIPFA Prudential Code that these are reported on a quarterly basis

#### **2. CAPITAL EXPENDITURE**

**2.1** Cotswold District Council has undertaken and is planning capital expenditure as summarised below.

<b>Capital Expenditure</b>	<b>2024/25 actual (£)</b>	<b>2025/26 forecast (£)</b>	<b>2026/27 budget (£)</b>	<b>2027/28 budget (£)</b>
General Fund services	6,909,309	2,979,000	7,744,000	4,208,000
Capital investments	211,101	0	0	0

**2.2** The main General Fund capital projects this year include expenditure in respect of Disabled Facilities Grants, purchase of Ubico Vehicles, expenditure on the council property portfolio.

#### **3. CAPITAL FINANCING REQUIREMENT**

**3.1** The Council's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with Minimum Revenue Provision (MRP) and capital receipts used to replace debt.

<b>Capital Financing Requirement (CFR)</b>	<b>2024/25 actual (£)</b>	<b>2025/26 forecast</b>	<b>2026/27 budget</b>	<b>2027/28 budget</b>
General Fund services	360,000	470,000	2,970,000	2,570,000
Capital investments	0	0	0	0
<b>TOTAL CFR</b>	<b>360,000</b>	<b>470,000</b>	<b>2,970,000</b>	<b>2,570,000</b>

#### **4. GROSS DEBT AND THE CAPITAL FINANCING REQUIREMENT**

## ANNEX B

### NON-TREASURY MANAGEMENT PRUDENTIAL INDICATORS

**4.1** Statutory guidance is that debt should remain below the capital financing requirement, except in the short term. The Council has complied and expects to continue to comply with this requirement in the medium term as is shown below.

<b>Gross Debt and CFR</b>	<b>31/03/2025 actual (£)</b>	<b>31/03/2026 forecast (£)</b>	<b>31/03/2027 budget (£)</b>	<b>31/03/2028 budget (£)</b>	<b>Debt at 30.6.2025  (£)</b>
Debt (incl. PFI & leases)	260,000	160,000	5,000	2,730,000	213,000
Capital Financing Requirement	360,000	470,000	2,970,000	2,570,000	

## 5. DEBT AND THE AUTHORISED LIMIT AND OPERATIONAL BOUNDARY

**5.1** The council is legally obliged to set an affordable borrowing limit (also termed the Authorised Limit for external debt) each year. In line with statutory guidance, a lower "operational boundary" is also set as a warning level should debt approach the limit.

<b>Debt, Authorised Limit and Operational Boundary</b>	<b>Maximum Debt Q2 2025/26 (£)</b>	<b>Debt as at 30/06/2025  (£)</b>	<b>2025/26 Authorised Limit (£)</b>	<b>2025/26 Operatio nal Boundar y (£)</b>	<b>Complied? Yes/No</b>
Borrowing	10,000,000	0	10,000,000	5,000,000	Yes
PFI and Finance Leases	0	0	0	0	Yes
<b>TOTAL Debt</b>	<b>10,000,000</b>	<b>0</b>	<b>10,000,000</b>	<b>5,000,000</b>	

**5.2** Since the operational boundary is a management tool for in-year monitoring it is not significant if the boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure.

## 6. NET INCOME FROM COMMERCIAL AND SERVICE INVESTMENTS TO NET REVENUE STREAM

**6.1** The Council's income from commercial and service investments as a proportion of its net revenue stream has been and is expected to be as indicated below.

	<b>2024/25 actual (£)</b>	<b>2025/26 forecast</b>	<b>2026/27 forecast (£)</b>	<b>2027/28 budget (£)</b>
Total net income from service and commercial investments	237,992	374,289	434,229	440,206
Proportion of net revenue stream	1.42%	2.29%	3.10%	3.44%

## 7. PROPORTION OF FINANCING COST TO NET REVENUE STREAM

**7.1** Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue.

**ANNEX B**  
**NON-TREASURY MANAGEMENT PRUDENTIAL INDICATORS**

**7.2** The net annual charge is known as financing costs, this is compared to the net revenue stream i.e., the amount funded from Council Tax, Business Rate, and general government grants.

	<b>2024/25 actual  (£)</b>	<b>2025/26 forecast  (£)</b>	<b>2026/27 budget  (£)</b>	<b>2027/28 budget  (£)</b>
Financing costs (£)	11,233	14,000	107,000	534,000
Proportion of net revenue stream	0.10%	0.09%	0.77%	4.17%

(END)

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# Agenda Item 16



**COTSWOLD**  
District Council

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET – 08 JANUARY 2026</b>
Subject	<b>STRATEGIC RISK REGISTER</b>
Wards affected	All
Accountable member	Councillor Mike Evemy, Leader of the Council Email: <a href="mailto:mike.evemy@cotswold.gov.uk">mike.evemy@cotswold.gov.uk</a>
Accountable officer	David Stanley, Deputy Chief Executive and Section 151 Officer Email: <a href="mailto:david.stanley@cotswold.gov.uk">david.stanley@cotswold.gov.uk</a>
Report author	David Stanley, Deputy Chief Executive and Section 151 Officer Email: <a href="mailto:david.stanley@cotswold.gov.uk">david.stanley@cotswold.gov.uk</a>
Summary/Purpose	The report sets out the current Strategic Risk Register for the Council.
Annexes	Annex A – Strategic Risk Register
Recommendation(s)	That Cabinet: <ol style="list-style-type: none"> <li>1. Reviews the Strategic Risk Register and mitigation measures.</li> <li>2. Endorses the proposal for the strategic risk register to be included in the work programme for the committee with a quarterly review frequency</li> </ol>
Corporate priorities	All
Key Decision	NO
Exempt	NO
Consultees/Consultation	Corporate Leadership Team, Leader of the Council, Cabinet Member for Finance, Audit and Governance Committee



## **1. EXECUTIVE SUMMARY**

- 1.1** This report sets out the Strategic Risk Register for Cotswold District Council which has been reviewed by the Corporate Leadership Team ("CLT") during Q2 and Q3 of the financial year.
- 1.2** The Strategic Risk Register was considered by Audit and Governance Committee at their meeting on 04 December 2025. Following discussion and review with the committee, "Procurement" has been added to the risk register.
- 1.3** The risks set out in Annex A of the report represent provide an update of the authority's strategic risks and the risk management work being undertaken; to assist the committee in fulfilling their obligations to periodically review the authority's Corporate Risk Register and to consider the effectiveness of the council's risk management arrangements.

## **2. BACKGROUND**

- 2.1** Audit and Governance Committee considered the Risk and Opportunity Management Policy at their meeting on 27 May 2025. The policy outlined sets the Council's approach to risk and opportunity management including defining what is Risk and Opportunity Management, our risk appetite as a council, definitions, roles, and responsibilities, and how risk management is embedded across the organisation.
- 2.2** The Council's risk appetite level is Cautious, although this can change on a risk-to-risk basis. It is willing to consider all potential options but with well evaluated risks and learning from experience. The risk appetites considered in the policy are shown below for information.



Averse	Cautious	Creative and Aware	Eager
<ul style="list-style-type: none"><li>Safe Business delivery options with low risks limited reward</li><li>Reluctant to take action given uncertainty</li></ul>	<ul style="list-style-type: none"><li>Safe delivery of options that have a medium degree of risk and potential for reward</li><li>Tight corporate control over change</li></ul>	<ul style="list-style-type: none"><li>Willing to consider all potential options that are most likely to result in success</li><li>Well evaluated risk taking</li><li>Learns from experience</li></ul>	<ul style="list-style-type: none"><li>Eager to be creative and innovative</li><li>Higher rewards despite inherent risk</li><li>Willing to accept significant loss</li><li>Actions when results are unknown</li></ul>

- 2.3** Accepted best practice is for risk management to be reported to members on a regular basis.
- 2.4** External Audit, as part of the annual assessment of the Council's arrangements for securing economy, efficiency and effectiveness (Value for Money) have recommended that the frequency of the review of the strategic risk register should be quarterly.
- 2.5** The Council's constitution sets out the role of the Audit and Governance Committee, which includes "Monitoring the arrangements for the identification, monitoring and control of strategic and operational risk within the Council" and "consider summaries of specific risk management reports, quarterly."
- 2.6** Members should view this review in response to the recommendation, and it is proposed that the strategic risk register be included in the work programme for the committee with a quarterly review frequency.
- 2.7** As an additional measure, the strategic risk register will be reviewed by Cabinet on a quarterly basis starting in January 2026 and will be aligned to the wider service and financial performance reporting cycle.



### **3. MAIN POINTS**

**3.1** In assessing risk, the Council utilises a 5x5 matrix (as shown below) with a score given to the Initial Risk and the Residual Risk (Current Risk)

<b>Likelihood</b>	<b>5</b>	5	10	15	20	25
	<b>4</b>	4	8	12	16	20
	<b>3</b>	3	6	9	12	15
	<b>2</b>	2	4	6	8	10
	<b>1</b>	1	2	3	4	5
		<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
<b>Impact</b>						

**3.2** The strategic risks facing the Council are set out in Annex A and are considered the risks that could impact the successful achievement of the Council's long-term core objectives, priorities, reputation, and outcomes. These risks are classed as strategic as they are not able to be managed at service level.

**3.3** The risks are summarised below for the purposes of this report, but members are encouraged to review Annex A.

- 2 risks scored 15 (Red) – Cyber Security, Health and Safety Compliance.
- 2 risks scored 12 (Amber) – Financial Sustainability, Local Plan delivery.
- 4 risks scored 9 or 10 (Amber) – Procurement, Contractor Failure, Corporate Plan delivery, Civil Contingency
- 5 risks scored 6 or 8 (Green) – Compliance GDPR/Data breach, Staff recruitment and retention, Service Standards (LGR impact), Staff capacity (LGR workload), Democratic resilience.



**3.4** Further controls, mitigation, or contingency is detailed for each risk set out in Annex A with follow-up action where appropriate.

**4. FINANCIAL IMPLICATIONS**

**4.1** There are no financial implications arising directly from this report.

**5. LEGAL IMPLICATIONS**

**5.1** There are no legal implications arising directly from this report.

**6. RISK ASSESSMENT**

**6.1** If the Council's governance arrangements are weak, then Council is at risk of failing to safeguard the use of public funds. In turn, this would lead to poor external assessments, damaging the reputation of the Council.

**7. EQUALITIES IMPACT**

**7.1** An equality impact assessment is not required for this report.

**8. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

**8.1** There are no climate or ecological emergency implications arising directly from this report.

**9. BACKGROUND PAPERS**

**9.1** None.

(END)

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# Cotswold District Council

## Strategic Risk Register

ID	Description of risk / opportunity	Owner	Initial Risk					Residual Risk (current)					Control, Mitigation or Contingency	Follow on Action (if required)	Risk Acceptance Level	Impact on or from Partner Authorities	Status: Open, Hold, or Closed	Direction of Travel since previous review	
			Impact category	Impact score	Likelihood category	Likelihood score	Score	Impact category	Impact score	Likelihood category	Likelihood score	Score							
<b>POLITICAL</b>																			
CDC_SRR_252601	Financial Sustainability The Council is unable to set a balanced budget for the forthcoming financial year	Deputy Chief Executive & Section 151 Officer	Major	5	Probable	4	20	Major	4	Possible	3	12	12	Experienced and qualified Team Awareness of the Budget Gap in previous MTFS Current Savings and Transformation Plan Reserves and Balances - adequate Quarterly Financial Performance reports to Cabinet & O&S Financial Implications on every report Engagement with Cabinet member and Informal Cabinet	Development of ABW External Auditor VFM judgement Transformation Plan - ABW Internal Audit to plan for audit of Budget Setting Process	Risk Reduction	<i>Risk to Partner Authorities but under control</i>	Open	
Page 261 CDC_SRR_252613	Procurement The Council does not undertake procurement activities in accordance with the Contract Rules and/or incurs expenditure in relation to services/works that has not been authorised in accordance with the Financial Procedure Rules.	Deputy Chief Executive & Section 151 Officer	Major	4	Probable	4	16	Moderate	3	Possible	3	9	9	Procurement Act 2023 (effective from 24/02/2025) with updated Contract Rules adopted in the constitution. Procurement Action Plan in place with additional mitigation measures. Procurement Toolkit available on intranet site. Procurement Training for Council staff delivered November 2025 Only authorised officers to undertake procurement Senior Procurement Business Partner to escalate any procurement concerns directly to CLT Review of TOR for Commissioning and Procurement Board	Mandatory Member Briefing on Procurement - 21 January 2026 Procurement Action Plan review to Audit & Governance Committee - April 2026 Internal Audit Plan 2026/27 follow-up Quarterly review at Audit & Governance Committee and Cabinet from January 2026 Improvements to ABW procurement module being tested ahead of rollout in 2026	Risk Reduction	<i>Risk to Partner Authorities but under control</i>	Open	
CDC_SRR_252602	Contractor Failure - Contract Management The Council does not effectively manage contracts with major suppliers and results in a failure to deliver services	Deputy Chief Executive & Section 151 Officer	Major	4	Possible	3	12	Moderate	3	Possible	3	9	9	Ubico & Publica - Teckal companies which CDC is a shareholder Publica - Shareholder Forum and Operational Forum (CDC Chair for 12 months from October 2025) Freedom - Leisure Contract manager (LC) Ubico - Waste & Recycling contract management (PJ) KPIs being developed with clear reporting framework to Cabinet & O&S on a quarterly basis Freedom - quarterly performance meetings with Freedom/Cabinet Member/Officers	Dun & Bradstreet alerts - follow up on how this is managed/communicated CDC to improve client-side management of key stakeholders	Risk Reduction	<i>No impact</i>	Open	

# Cotswold District Council

## Strategic Risk Register

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			Impact category	Impact score	Likelihood category	Likelihood score	Score	Impact category	Impact score	Likelihood category	Likelihood score	Score							
CDC_SRR_252603	Compliance - Health & Safety Risk of death or injury to service users/staff due to breach of H&S information	Chief Executive	Extreme	5	Possible	3	15	Extreme	5	Possible	3	15	15	H&S Team, policy Risk assessments in place	Full set of H&S procedures to be developed and implemented All inspections relating to assets (e.g. Legionella) are recorded on the Council's asset management system with quarterly reporting to H&S Board/CLT Review of H&S Board TOR CEX to bring H&S Board minutes to CLT quarterly and agree actions	Risk Avoidance	No impact	Open	
CDC_SRR_252604	Compliance - GDPR/Data Breach The Council does not have adequate internal controls around the management of its data resulting in a data breach	Chief Executive	Major	4	Probable	4	16	Major	4	Remote	2	8	8	Data Protection Officer Training (mandatory) DP policies ICT Acceptable use policy Nominated SIRO Reporting of data breaches and near misses Cabinet member responsible for data governance	Annual report to the Cabinet member on data governance	Risk Avoidance	No impact	Open	
CDC_SRR_252605	Staff Inability to recruit and retain suitably qualified and experienced staff to deliver services	Chief Executive	Major	4	Possible	3	12	Moderate	3	Remote	2	6	6	Vacancy Management process Authority to Fill process Market Supplements, Flexible working, employee benefits (Medicash etc) Ability to bring in Agency Staff Shared agreements with other Councils Trainee roles/apprenticeships Approach to Learning & Development - Professional Learning Positive Workplace culture - People & Culture Strategy Appraisals	CT Developing a framework for Training & Development Publica - partnership working with FODDC and WODC Consideration of mutual aid policy across Gloucestershire Review of secondment agreements to ensure mitigation measures are effective	Risk Acceptance & Retention	Publica Risk	Open	
CDC_SRR_252606	Service Standards LGR risk inability to maintain BAU and support the Council and/or residents due to insufficient staff capacity (time spent on LGR)	Chief Executive	Moderate	3	Possible	3	9	Minor	2	Possible	3	6	6	Some services delivered by a partner organisation (Ubico, Publica) Wellbeing strategy and other employee benefits to support staff Capacity Fund to support delivery of BAU (CLT) - backfill may be an option Managing members and expectations through ongoing communication and briefings on Corporate Plan and service standards	s151 Ensure Capacity Fund is adequate to support Council until 31/03/2028	Risk Acceptance & Retention	Risk to Partner Authorities but under control	Open	

# Cotswold District Council

## Strategic Risk Register

ID	Description of risk / opportunity	Owner	Initial Risk					Residual Risk (current)					Change in residual risk since previous review	Control, Mitigation or Contingency	Follow on Action (if required)	Risk Acceptance Level	Impact on or from Partner Authorities	Status: Open, Hold, or Closed	Direction of Travel since previous review
			Impact category	Impact score	Likelihood category	Likelihood score	Score	Impact category	Impact score	Likelihood category	Likelihood score	Score							
CDC_SRR-252607	LGR Risk (staff unable to contribute/burnout) Inability to support the Council and Residents in the transition from District to Unitary Council	Chief Executive	Moderate	3	Possible	3	9	Minor	2	Possible	3	6	6	Some services delivered by a partner organisation (Ubico, Publica) Wellbeing strategy and other employee benefits to support staff Capacity Fund to support delivery of BAU (CLT) - backfill may be an option Managing members and expectations through ongoing communication and briefings on Corporate Plan and service standards	s151 Ensure Capacity Fund is adequate to support Council until 31/03/2028 Identification of single points of failure	Risk Reduction	<i>Risk to Partner Authorities but under control</i>	Open	
CDC_SRR-252608	Local Plan The Council is not able to adopt the Local Plan in 2027 leading to unsustainable piecemeal developments which do not provide infrastructure	Director of Communities & Place	Major	4	Probable	4	16	Moderate	3	Probable	4	12	12	Local Plan Oversight Board LP Project Management Leader and Deputy Leader commitment to deliver Review of Planning Services structures and resources Earmarked Reserve (£1m) + Grant funding (£0.230m)	s151 Ensure reserve funding is adequate to support Plan delivery	Risk Reduction	<i>Risk to Partner Authorities but under control</i>	Open	
CDC_SRR-252609	Corporate Plan Inability to deliver the priorities as set out in the Corporate Plan leading to reputation risk to the Council	Chief Executive	Moderate	3	Probable	4	12	Moderate	3	Possible	3	9	9	Corporate Plan refresh adopted September 2025 with realistic and deliverable targets Quarterly Performance reporting on CP Actions Staff clear on responsibilities and accountabilities through appraisals Service plans - Golden thread and embeds CP in the Council	Review of CP Actions on an annual basis to ensure actions match resources and can be delivered within timeframe of LA	Risk Reduction	<i>Risk to Partner Authorities but under control</i>	Open	
CDC_SRR-252610	Civil Contingency/Major Event The Council is not adequately prepared to deal with a major Civil Contingency leading to harm to life	Chief Executive	Extreme	5	Possible	3	15	Extreme	5	Remote	2	10	10	BCP Plans Emergency Planning Training and Development of those involved in response (Gold etc) Publica process on emergency planning/rota	CLT to review key service BCPs such as Finance - include as item on CLT Forward Plan Q4 2025/26	Risk Reduction	<i>Risk to Partner Authorities but under control</i>	Open	
CDC_SRR-252611	Cyber Attack The Council is inadequately prepared for a cyber attack (e.g. ransomware) leading to Council systems being unavailable and inability to deliver services	Chief Executive	Extreme	5	Possible	3	15	Extreme	5	Possible	3	15	15	Team Ability to cooperate	Regulr briefings to CLT from service on state of cyber readiness, training etc	Risk Reduction	<i>Risk to Partner Authorities but under control</i>	Open	
CDC_SRR-252612	Resilience - Democracy Elected members do not agree to extending their term of office beyond May 2027 leading to an inability of the Council to make decisions (not being quorate, elections)	Director of Governance & Development	Moderate	3	Possible	3	9	Moderate	3	Remote	2	6	6		Understand nature of final 11 months prior to vesting day and how member vacancies are covered	Risk Reduction	<i>Risk to Partner Authorities but under control</i>	Open	

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# Agenda Item 17



**COTSWOLD**  
District Council

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET – 8 JANUARY 2026</b>
Subject	<b>2025 COMMUNITY INFRASTRUCTURE LEVY FUNDING RECOMMENDATIONS(updated)</b>
Wards affected	All
Accountable member	Juliet Layton - Member for Communities and Place Email: <a href="mailto:Juliet.layton@cotswold.gov.uk">Juliet.layton@cotswold.gov.uk</a>
Accountable officer	Helen Martin – Director of Communities and Place Email: <a href="mailto:helen.martin@cotswold.gov.uk">helen.martin@cotswold.gov.uk</a>
Report author	Kim Langford-Tejrar – Infrastructure Delivery Lead (Shared) Email: <a href="mailto:kim.langford-tejrar@westoxon.gov.uk">kim.langford-tejrar@westoxon.gov.uk</a>
Summary/Purpose	<p>A multidisciplinary officer panel has reviewed the Community Infrastructure Levy (CIL) funding bids received in 2025 and made recommendations as to which bids should receive funding for the 2025 bid period. To ensure impartiality, Council officers were invited via email, the staff portal and staff newsletter to volunteer to take part in the panel, subject to a conflict-of-interest declaration. This report provides summaries of those bids and officer feedback. Its purpose is to ask the Cabinet to agree officer recommendations for funding relevant bids and refuse funding for bids which are not suitable for funding currently.</p> <p>This is the second time since becoming a CIL charging authority in 2019 that the Council has received bids for funding. Upon receipt, a proportion of CIL goes direct to the district's neighbourhoods (parish meetings/councils and town councils) and the remainder goes to the Council's Strategic CIL fund. The bids subject of this report are requesting funding from the Strategic Fund. The amount of CIL funding bids for this year was greater than the amount of available funds in the CIL Strategic Fund.</p> <p>The multidisciplinary officer panel has made its recommendations based on the statutory requirements for CIL spending in the CIL Regulations 2010 (as amended) and to ensure that CIL is spent:</p>



	<ul style="list-style-type: none"><li>• Legally</li><li>• Responsibly</li><li>• Strategically</li><li>• Accountably</li></ul>
Annexes	Annex A – Officer Panel Feedback Forms
Recommendation(s)	<p>That Cabinet resolves to:</p> <ol style="list-style-type: none"><li>1. Agree to allocate funding for the following bids, as set out in Table 4:<ul style="list-style-type: none"><li>• Cycle parking Cotswold National Cycle Network (GCC with Walk Wheel Cycle Trust)</li><li>• Farmor's School 3G Pitch (Farmor's School)</li><li>• Redesdale Hall Phase 2 (Redesdale Hall Trust)</li></ul></li><li>2. Delegate authority to the Assistant Director Planning Services in consultation with the Cabinet Member for Housing and Planning, to progress the funding bids subject to the Assistant Director of Planning Services, Legal Services, and the Finance Service undertaking the required due diligence to ensure a formal agreement is in place prior to the release of funding in accordance with the CIL funding guidance notes.</li></ol>
Corporate priorities	<ul style="list-style-type: none"><li>• Delivering Good Services</li><li>• Responding to the Climate Emergency</li><li>• Supporting Communities</li></ul>
Key Decision	YES
Exempt	NO
Consultees/ Consultation	The existing process for CIL Strategic Fund funding involves ongoing engagement with the infrastructure providers and stakeholders, to generate bids for funding. Bidders are required to justify their bid based on the existing and potential needs of our communities in line with growth. The bidding period represents a significant internal and external consultation process, as set out in the report. There will be proposed changes and improvements to the bidding system and CIL governance generally, which will be brought before the Cabinet early next year.



## **1. EXECUTIVE SUMMARY**

- 1.1 The Council collects funding from development through the Community Infrastructure Levy (CIL). A portion of the levy goes towards a strategic fund (Community Infrastructure Levy Strategic Fund (CIL SF)), which can be used to deliver infrastructure to meet our residents' needs.
- 1.2 To make use of the fund, the Council engages with key stakeholders and advertises opportunities for infrastructure funding from the CIL SF annually. This year (2025) represents the second year in which bids have been submitted from stakeholders since CIL charging began for the Council in 2019.
- 1.3 The deadline for submitting bids this year was extended because a key stakeholder was unable to submit bids by the deadline, and because the amount of funding sought this year exceeds the amount of funding currently available in the CIL SF. The Infrastructure Delivery Team took additional time to engage and advise bidders and to offer additional opportunities for bidders to refine their bids.
- 1.4 Under the current Council CIL SF spending approach, there are no validation or evidential requirements for bids, other than responding to a pre-set scoring system. This has resulted in varied quality and detail in the bids, despite additional advice from officers.
- 1.5 Moreover, the current process puts great emphasis onto large-scale infrastructure projects identified in the current local plan (which is predominantly a list of highway improvements). Therefore, it is necessary to take a flexible approach in considering the current CIL SF bid scoring matrix to ensure the current and future needs of our residents are addressed through CIL SF funding. The Infrastructure Delivery Team proposes to review the governance of CIL in the new year and will be making recommendations to Cabinet on this basis.
- 1.6 In addition to the amount of funding sought exceeding the available CIL SF fund, there are also two bids which have an overlap of infrastructure offer.
- 1.7 A multidisciplinary panel of officers have reviewed all the bids to ensure they are legal, responsible, strategic and accountable, and has made recommendations as to which should receive funding from the CIL SF. Those recommendations, set out in Table 4, are referred to Cabinet for agreement.

## **2. BACKGROUND**

Where does the Community Infrastructure Levy Strategic Fund (CIL SF) come from?



- 2.1 Developers are expected to make contributions towards new or improved infrastructure (such as play areas, public open spaces, healthcare, schools, roads, etc) to meet the community's needs arising from planned growth. Developer contributions are made via Section 106 planning obligations (S106) and/ or CIL. Cotswold District Council has been a CIL charging authority since June 2019.
- 2.2 CIL is charged at a set-rate per square metre of all liable residential and retail development. The charge is indexed annually for inflation and details of the charges are available on the Council's website<sup>1</sup>.
- 2.3 Regulation 59 of the CIL Regulations 2010 (as amended) requires that charging authorities apply CIL to funding infrastructure to support development in its area, although a charging authority may also apply CIL to infrastructure outside of its area where to do so would support the development of the area.
- 2.4 Local Planning Authorities (LPAs) can adopt CIL charging schedules where they have established a clear need for additional funding and have robustly demonstrated that a CIL charge will not make the planned growth unviable. To establish the clear need for additional funding, the Council must:
  - Identify the infrastructure needs arising from growth in its Local Plan.
  - Use this to produce an Infrastructure Delivery Plan (IDP).
  - Review its infrastructure list annually in its Infrastructure Funding Statement (IFS).
  - Alongside the IDP, establish the cost of critical and essential infrastructure for delivering the growth in the Local Plan and determine whether there is a funding gap.
- 2.5 A funding gap justifies the CIL charging rate, which must be set at a rate which does not undermine the viability of the Local Plan. As a result, CIL is inextricably linked to the plan-led approach. Understanding of this is important to the context of CIL bids received this year.
- 2.6 Due to the evidential process for justifying a CIL charging schedule, the CIL SF is often focussed towards large, high-cost infrastructure projects. The types of infrastructure which meet the everyday needs of our residents and help to establish or maintain healthy and sustainable communities (such as sports and community facilities) can be overlooked. Neighbourhood CIL (NCIL) paid to the individual neighbourhoods may, in some circumstances, bridge the gaps but it cannot address strategic (beyond local) needs for healthy and sustainable communities. To address this, the Infrastructure Delivery Team will bring forward recommendations for

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<sup>1</sup> <https://www.cotswold.gov.uk/planning-and-building/community-infrastructure-levy/calculate-your-cil-charge/>



improvements to CIL governance and procedures for Cabinet consideration in the new year.

What are the rules for spending CIL?

- 2.7 When received, CIL is divided into three 'pots' in accordance with the CIL Regulations. The first 'pot' covers the administration of CIL and amounts to 5% of total receipts. The second 'pot' is a proportion of either 15% capped or 25% uncapped, which is passed directly to the 'neighbourhoods' (town and parish councils/ meetings) for their use towards localised infrastructure needs. The final 'pot' is the remainder, which is the CIL SF.
- 2.8 The CIL SF is intended to contribute towards the 'bigger ticket' strategic type infrastructure which meets the needs of a wider array of residents (in terms of demographics, quantum and/or geographic spread). The CIL SF is intended to enable the growth identified in the Local Plan, and for this reason, the scoring system for bids, which was set out when the Council began CIL charging in 2019, is weighted towards infrastructure which is identified in the IDP, IFS and certain strategic policies of the Local Plan. However, the Council's IDP was produced in 2016 for the current Local Plan, and as a result, the infrastructure items listed in the IDP do not necessarily reflect current infrastructure needs. The Council is producing a new Local Plan at pace, and as part of this process, it will also produce a new IDP and review the CIL charge. The IDP list is set out in the relevant feedback forms.
- 2.9 For this year's bids, a certain degree of flexibility around the inclusion of infrastructure in the 2016 IDP has been necessary, and the overall aims of the existing bid criteria/ scoring have been prioritised over the inclusion in the IDP or existing plan strategic policies. Bids which could refer to other up-to-date evidence-based documents to establish a strategic need/ response to growth have received proportionate scores, even where they have not been within the IDP or policies. This also means that, in rare cases, bids which have not been recommended for funding may have received a reasonable score in comparison to funding recommended bids on the basis of being identified infrastructure within the IDP or policies, but they have not been recommended for funding because they fail to demonstrate compliance with the overall aims of the bid criteria. The overall aims of the existing bid criteria when they were developed, were to ensure CIL SF spending is:
  - Legal
  - Responsible
  - Strategic
  - Accountable.



Detailed explanations of these aims are set out in the feedback forms at Annex A of the Cabinet Report.

- 2.10 Any successful bids will be subject to a legal agreement which allows for clawback of unspent funds, phasing of payments and contingencies (to be paid only when evidenced as necessary). These agreements are to mitigate the risk of misappropriation or loss of public monies.
- 2.11 The governance of CIL and engagement around it, including the spending policy and process for CIL SF, are currently being reviewed. New governance recommendations are expected to be brought before Cabinet in the new year. In particular, this will make the bid system:
  - Streamlined and easier to access.
  - Set evidentiary, responsibility and accountability standards for bids.
  - Increase transparency and consultation on bids.
  - Track potential infrastructure projects to establish a capital programme.
  - Better respond to current needs, putting infrastructure first as far as possible.

- 2.12 For more information on the Local Plan progression and CIL collection and spending, please see our website [www.cotswold.gov.uk/CIL](http://www.cotswold.gov.uk/CIL).

### **3. FUNDING AVAILABLE FROM THE CIL SF FUND**

- 3.1 Some CIL SF funding has already been committed for the following successful bids in the 2024 bidding period. A large proportion of these funds has yet to be transferred to bidders due to the current spending procedure, which involves legal agreements.

Table 1- Previous Successful Bids- Allocated Funding

Scheme	Bidder	Amount Allocated (£)
Kemble to Steadings Greenway	Sustrans	180,301.00
Cirencester to Kemble Cycle Link	GCC / Sustrans	100,000.00
Bourton on the Water Interchange	GCC	137,700.00
Footpath in Moreton in Marsh	GCC	146,030.17
Forum Interchange Hub	GCC	66,300.00
Sherbourne Big Nature	National Trust	30,000.00
Total		660,331.17



3.2 The above bid funds have been secured and ring-fenced from the total CIL SF fund. 10% of the CIL SF fund is also ring-fenced on net receipts (less neighbourhood CIL) towards infrastructure for Climate and Ecological Emergencies (fund). Bids have also been received for the CEE fund, and these have been assessed according to their own criteria.

Table 2- Available CIL Funds

<b>Totals</b>	<b>Amounts (£)</b>
CIL SF held at end of bidding period	5,502,299.43
Of which Climate and Ecological Emergencies fund (CEE) (10%)	550,229.94
CIL SF total less CEE	4,952,069.49
2024 CIL SF successful bids	630,331.17
<b>2025 CIL SF available (less successful bids)</b>	<b>4,321,738.32</b>
2024 CEE successful bids	30,000.00
<b>2025 CEE fund available (less successful bids)</b>	<b>520,229.94</b>

3.3 The amount of funding requested this year has exceeded the total available SF fund. Table 3 below demonstrates this.

Table 3- Bid Totals

<b>Bids</b>	<b>Amounts (£)</b>
1a Cirencester LCWIP wayfinding	14,097.32
1b Cirencester LCWIP parallel crossing	109,731.48
2 Cycle parking CNC	27,700.00
3 Car club in Cirencester	56,880.00
4 Fairford Town Grassroots Growth Project	209,000.00
5 MiM Transport interchange hub	4,066,628.00
6 Farmor's School 3G pitch	723,006.00
7 Redesdale Hall Phase 2	200,000.00
8 Weston Sub Edge car park	20,000.00
<b>2025 CIL SF bid total</b>	<b>5,427,852.80</b>
2025 CIL SF Available	4,321,738.32
<b>2025 CIL SF Deficit</b>	<b>1,106,114.48</b>
9 CEE Grassland regeneration	100,000.00
10 CEE Take a stand cycle parking	25,000
<b>2025 CEE bid total</b>	<b>125,000.00</b>
2025 CEE fund available	520,229.94
2025 CEE left over if all bids CEE bids approved	395,229.94



#### 4. THE SUMMARIES AND RECOMMENDATIONS

4.1 The detail of the bids including the amount requested, what the bid is for and the panel outcome is set out in the below table. The detailed feedback, including the assessment criteria are in Annex A- Officer Panel Feedback Forms.

Table 4- Bid summary and recommendations

<b>Bid</b>	<b>Bidder</b>	<b>Amount (£)</b>	<b>Bid Summary</b>	<b>Fun d(?)</b>	<b>Reasons (summary)</b>
1a Cirencester LCWIP wayfinding	GCC	14,097.32	Installation of enhanced wayfinding signs and a road crossing on London Road East, Cirencester	No	The scheme is within the IDP and policy, however, the bid does not sufficiently address the responsibility requirement for SF CIL. The costing for the scheme has not been justified and there are concerns over some costs included.
1b Cirencester LCWIP parallel crossing	GCC	109,731.48	As above.	No	The scheme is within the IDP and policy, however, the bid does not sufficiently address the responsibility requirement for SF CIL. The costing for the scheme has not been justified (also there are concerns over some costs included).
2 Cycle parking CNC	GCC and WWCT	27,700.00	Cycle parking provision along the route of	Yes	Whilst this scheme is not included in the IDP, which limits its scoring ability, it is a sustainable transport scheme specifically recognised in strategic policies. The panel felt this was an exemplar bid in terms of its



			Cotswold National Cycle Network		approach to strategic reach, legal test, responsibility and accountability. The panel took into the wide-reaching impact of this scheme.
3 Car club in Cirencester	GCC	56,880.00	Establishment of a car club in Cirencester. Purchase a single EV vehicle and acquire parking for it.	No	The scheme is not within the IDP or strategic policies. The strategic impact arising from this scheme would be limited as it is small in scale and does not address scaling up to meet needs of growth. The scheme failed to score on the strategic requirement and was automatically disqualified. The panel also had concerns around use of public money for investment in private enterprise (responsibility and accountability concerns).
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5 MiM Transport interchange hub	GWR and MiM TC	4,066,628.00	Improvements to M-i-M Railway Station to create a transport hub (entrance and parking improvements)	No	This scheme is not within the IDP or strategic policies, limiting its ability to score. Sustainable transport is generally supported and encouraged by the Council. The panel opted to consider this scheme as strategic, due to its scale, nature and the fact it has planning permission. An unsuccessful bid was made for this scheme in 2024- refusal to fund was based on the lack of planning permission and questions over response to growth. The 2024 bid was for just over £2mil, the current bid has doubled on cost. The panel has serious concerns around the responsibility of funding this scheme, which calls for a large capital investment predominantly from CIL alone (little to no match funding from key stakeholders) and which does not respond to any current growth strategy. There were additional concerns around some costs included and the potential that some funds would be put towards private enterprise. The panel considers that the scheme could undermine other strategic infrastructure delivery arising through the emerging local plan and IDP (i.e. that it is premature to the IDP), which would have a detrimental impact on residents. Several vociferous consultation responses were received by the panel both in favour and against this scheme- including a disparity of views from the TC itself.
6 Farmor's School 3G pitch	Farmor's School	723,006.00	Community all-weather	Yes	This scheme is not within the IDP or strategic policies, which limits its score. The panel felt this was a well evidenced and carefully thought-out bid, which met the requirements for SF CIL. This bid was in competition with another bid for a smaller facility in the same place. It was felt that this



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## 5. CONCLUSIONS

5.1 The multidisciplinary officer panel puts these recommendations forward to Cabinet for endorsement. The next steps would then be to organise legal agreements and draw down of funds with successful bidders, as well as liaise with unsuccessful bidders about potential future funds.

## 6. FINANCIAL IMPLICATIONS

6.1 The CIL SF fund is a standalone budget which cannot be spent on anything other than infrastructure projects in accordance with the CIL Regulations.

6.2 The financial implications of this funding would be that the funding is provided to external organisations and stakeholders in line with the CIL Regulations and the Council's own CIL processes.

6.3 There would necessarily be a reduction in current CIL SF balance, as set out in Table 5, however, this is continually topped up by CIL receipts which may.

Table 5- Available CIL receipts after funding approved bids

<b>Totals</b>	<b>Amounts (£)</b>
CIL SF available (less 2024 successful bids)	4,321,738.32
Successful Bid (Bid 2) Cycle parking CNC	27,700.00
Successful Bid (Bid 6) Farmor's School 3G Pitch	723,006.00
Successful Bid (Bid 7) Redesdale Hall Phase 2	200,000.00
<b>2025 CIL SF available (less successful bids)</b>	<b>3,371,032.32</b>

6.4 The amount of funding recommended this year is proportionate to the previous year's receipts and expected receipts for next year. The bids relate to capital projects, and there would be no revenue implications for the Council. The remaining CIL balance will be subject to bids for infrastructure in 2026, and any available funds can be used to contribute towards the delivery of infrastructure identified as critical to the emerging Local Plan. As set out in paragraph 2.6, recommendations for improvements to the governance and spending policy for CIL will be brought before Cabinet early next year.

## 7. LEGAL IMPLICATIONS

7.1 The successful bids comply with the CIL legal requirements.

7.2 Legal services have provided template legal agreements, which will be signed and sealed before any funds are drawn down. These legal agreements contain reporting and other obligations for the bidders who intend to mitigate the risk of loss of the relevant CIL SF funding, and also provisions for clawback of unspent funds. The risk



of loss of CIL SF funding by relevant infrastructure projects not being delivered as agreed is limited and discrete.

## **8. RISK ASSESSMENT**

8.1 There are no significant risks to the Council in respect of CIL SF funding, other than the potential for external factors which might stymy the delivery of the infrastructure projects being delivered by the bidders (infrastructure stakeholders). This risk is discrete and isolated and is mitigated as above.

## **9. EQUALITIES IMPACT**

9.1 The infrastructure funded in part or in full by the CIL SF fund will meet the needs of a wide demographic of residents, and none of the projects funded would be inaccessible to any groups or individuals. The CIL SF funding has a positive impact on equality, and the needs of all groups were considered in decision-making (per the feedback forms).

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

10.1 The CIL SF includes a ring-fenced amount for climate and ecological emergencies infrastructure responses. Whilst no bids have been successful under this fund, the Infrastructure Delivery Team will continue to engage with potential stakeholders.

10.2 The majority of successful bids relate to sustainable transport and/or provide sustainable responses to meeting residents' needs. At present, it is not possible to quantify this impact, other than to recognise that reductions in carbon emissions from transport and air pollution are expected. (Include details of any climate and ecological emergency implications. There is also potential for energy use reduction via renewable energy sources. This will be determined by the detailed schemes as they are developed.

## **11. BACKGROUND PAPERS**

11.1 None

(END)



Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET – 8 JANUARY 2026</b>
Subject	<b>2025 COMMUNITY INFRASTRUCTURE LEVY FUNDING RECOMMENDATIONS</b>
Wards affected	All
Accountable member	Juliet Layton – Cabinet Member for Housing and Planning Email: <a href="mailto:Juliet.layton@cotswold.gov.uk">Juliet.layton@cotswold.gov.uk</a>
Accountable officer	Helen Martin – Director of Communities and Place Email: <a href="mailto:helen.martin@cotswold.gov.uk">helen.martin@cotswold.gov.uk</a>
Report author	Kim Langford-Tejrar – Infrastructure Delivery Lead (Shared) Email: <a href="mailto:kim.langford-tejrar@westoxon.gov.uk">kim.langford-tejrar@westoxon.gov.uk</a>
Summary/Purpose	<p>A multidisciplinary officer panel has reviewed the Community Infrastructure Levy (CIL) funding bids received in 2025 and made recommendations as to which bids should receive funding for the 2025 bid period. To ensure impartiality, Council officers were invited via email, the staff portal and staff newsletter to volunteer to take part in the panel, subject to a conflict-of-interest declaration. This report provides summaries of those bids and officer feedback. Its purpose is to ask the Cabinet to agree officer recommendations for funding relevant bids and refuse funding for bids which are not suitable for funding currently.</p> <p>This is the second time since becoming a CIL charging authority in 2019 that the Council has received bids for funding. Upon receipt, a proportion of CIL goes direct to the district's neighbourhoods (parish meetings/councils and town councils) and the remainder goes to the Council's Strategic CIL fund. The bids subject of this report are requesting funding from the Strategic Fund. The amount of CIL funding bids for this year was greater than the amount of available funds in the CIL Strategic Fund.</p> <p>The multidisciplinary officer panel has made its recommendations based on the statutory requirements for CIL spending in the CIL Regulations 2010 (as amended) and to ensure that CIL is spent:</p>



	<ul style="list-style-type: none"><li>• Legally</li><li>• Responsibly</li><li>• Strategically</li><li>• Accountably</li></ul>
Annexes	Annex A – Officer Panel Feedback Forms
Recommendation(s)	<p>That Cabinet resolves to:</p> <ol style="list-style-type: none"><li>1. Agree to allocate funding for the following bids, as set out in Table 4:<ul style="list-style-type: none"><li>• Cycle parking Cotswold National Cycle Network (GCC with Walk Wheel Cycle Trust)</li><li>• Farmor's School 3G Pitch (Farmor's School)</li><li>• Redesdale Hall Phase 2 (Redesdale Hall Trust)</li></ul></li><li>2. Delegate authority to the Assistant Director Planning Services in consultation with the Cabinet member for Housing and Planning, to progress funding for approved bids in consultation with Legal Services and in line with the existing process.</li></ol>
Corporate priorities	<ul style="list-style-type: none"><li>• Delivering Good Services</li><li>• Responding to the Climate Emergency</li><li>• Supporting Communities</li></ul>
Key Decision	YES
Exempt	NO
Consultees/ Consultation	The existing process for CIL Strategic Fund funding involves ongoing engagement with the infrastructure providers and stakeholders, to generate bids for funding. Bidders are required to justify their bid based on the existing and potential needs of our communities in line with growth. The bidding period represents a significant internal and external consultation process, as set out in the report. There will be proposed changes and improvements to the bidding system and CIL governance generally, which will be brought before the Cabinet early next year.



## **1. EXECUTIVE SUMMARY**

- 1.1 The Council collects funding from development through the Community Infrastructure Levy (CIL). A portion of the levy goes towards a strategic fund (Community Infrastructure Levy Strategic Fund (CIL SF)), which can be used to deliver infrastructure to meet our residents' needs.
- 1.2 To make use of the fund, the Council engages with key stakeholders and advertises opportunities for infrastructure funding from the CIL SF annually. This year (2025) represents the second year in which bids have been submitted from stakeholders since CIL charging began for the Council in 2019.
- 1.3 The deadline for submitting bids this year was extended because a key stakeholder was unable to submit bids by the deadline, and because the amount of funding sought this year exceeds the amount of funding currently available in the CIL SF. The Infrastructure Delivery Team took additional time to engage and advise bidders and to offer additional opportunities for bidders to refine their bids.
- 1.4 Under the current Council CIL SF spending approach, there are no validation or evidential requirements for bids, other than responding to a pre-set scoring system. This has resulted in varied quality and detail in the bids, despite additional advice from officers.
- 1.5 Moreover, the current process puts great emphasis onto large-scale infrastructure projects identified in the current local plan (which is predominantly a list of highway improvements). Therefore, it is necessary to take a flexible approach in considering the current CIL SF bid scoring matrix to ensure the current and future needs of our residents are addressed through CIL SF funding. The Infrastructure Delivery Team proposes to review the governance of CIL in the new year and will be making recommendations to Cabinet on this basis.
- 1.6 In addition to the amount of funding sought exceeding the available CIL SF fund, there are also two bids which have an overlap of infrastructure offer.
- 1.7 A multidisciplinary panel of officers have reviewed all the bids to ensure they are legal, responsible, strategic and accountable, and has made recommendations as to which should receive funding from the CIL SF. Those recommendations, set out in Table 4, are referred to Cabinet for agreement.

## **2. BACKGROUND**

Where does the Community Infrastructure Levy Strategic Fund (CIL SF) come from?



- 2.1 Developers are expected to make contributions towards new or improved infrastructure (such as play areas, public open spaces, healthcare, schools, roads, etc) to meet the community's needs arising from planned growth. Developer contributions are made via Section 106 planning obligations (S106) and/ or CIL. Cotswold District Council has been a CIL charging authority since June 2019.
- 2.2 CIL is charged at a set-rate per square metre of all liable residential and retail development. The charge is indexed annually for inflation and details of the charges are available on the Council's website<sup>1</sup>.
- 2.3 Regulation 59 of the CIL Regulations 2010 (as amended) requires that charging authorities apply CIL to funding infrastructure to support development in its area, although a charging authority may also apply CIL to infrastructure outside of its area where to do so would support the development of the area.
- 2.4 Local Planning Authorities (LPAs) can adopt CIL charging schedules where they have established a clear need for additional funding and have robustly demonstrated that a CIL charge will not make the planned growth unviable. To establish the clear need for additional funding, the Council must:
  - Identify the infrastructure needs arising from growth in its Local Plan.
  - Use this to produce an Infrastructure Delivery Plan (IDP).
  - Review its infrastructure list annually in its Infrastructure Funding Statement (IFS).
  - Alongside the IDP, establish the cost of critical and essential infrastructure for delivering the growth in the Local Plan and determine whether there is a funding gap.
- 2.5 A funding gap justifies the CIL charging rate, which must be set at a rate which does not undermine the viability of the Local Plan. As a result, CIL is inextricably linked to the plan-led approach. Understanding of this is important to the context of CIL bids received this year.
- 2.6 Due to the evidential process for justifying a CIL charging schedule, the CIL SF is often focussed towards large, high-cost infrastructure projects. The types of infrastructure which meet the everyday needs of our residents and help to establish or maintain healthy and sustainable communities (such as sports and community facilities) can be overlooked. Neighbourhood CIL (NCIL) paid to the individual neighbourhoods may, in some circumstances, bridge the gaps but it cannot address strategic (beyond local) needs for healthy and sustainable communities. To address this, the Infrastructure Delivery Team will bring forward recommendations for

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<sup>1</sup> <https://www.cotswold.gov.uk/planning-and-building/community-infrastructure-levy/calculate-your-cil-charge/>



improvements to CIL governance and procedures for Cabinet consideration in the new year.

What are the rules for spending CIL?

- 2.7 When received, CIL is divided into three 'pots' in accordance with the CIL Regulations. The first 'pot' covers the administration of CIL and amounts to 5% of total receipts. The second 'pot' is a proportion of either 15% capped or 25% uncapped, which is passed directly to the 'neighbourhoods' (town and parish councils/ meetings) for their use towards localised infrastructure needs. The final 'pot' is the remainder, which is the CIL SF.
- 2.8 The CIL SF is intended to contribute towards the 'bigger ticket' strategic type infrastructure which meets the needs of a wider array of residents (in terms of demographics, quantum and/or geographic spread). The CIL SF is intended to enable the growth identified in the Local Plan, and for this reason, the scoring system for bids, which was set out when the Council began CIL charging in 2019, is weighted towards infrastructure which is identified in the IDP, IFS and certain strategic policies of the Local Plan. However, the Council's IDP was produced in 2016 for the current Local Plan, and as a result, the infrastructure items listed in the IDP do not necessarily reflect current infrastructure needs. The Council is producing a new Local Plan at pace, and as part of this process, it will also produce a new IDP and review the CIL charge. The IDP list is set out in the relevant feedback forms.
- 2.9 For this year's bids, a certain degree of flexibility around the inclusion of infrastructure in the 2016 IDP has been necessary, and the overall aims of the existing bid criteria/ scoring have been prioritised over the inclusion in the IDP or existing plan strategic policies. Bids which could refer to other up-to-date evidence-based documents to establish a strategic need/ response to growth have received proportionate scores, even where they have not been within the IDP or policies. This also means that, in rare cases, bids which have not been recommended for funding may have received a reasonable score in comparison to funding recommended bids on the basis of being identified infrastructure within the IDP or policies, but they have not been recommended for funding because they fail to demonstrate compliance with the overall aims of the bid criteria. The overall aims of the existing bid criteria when they were developed, were to ensure CIL SF spending is:
  - Legal
  - Responsible
  - Strategic
  - Accountable.



Detailed explanations of these aims are set out in the feedback forms at Annex A of the Cabinet Report.

2.10 Any successful bids will be subject to a legal agreement which allows for clawback of unspent funds, phasing of payments and contingencies (to be paid only when evidenced as necessary). These agreements are to mitigate the risk of misappropriation or loss of public monies.

2.11 The governance of CIL and engagement around it, including the spending policy and process for CIL SF, are currently being reviewed. New governance recommendations are expected to be brought before Cabinet in the new year. In particular, this will make the bid system:

- Streamlined and easier to access.
- Set evidentiary, responsibility and accountability standards for bids.
- Increase transparency and consultation on bids.
- Track potential infrastructure projects to establish a capital programme.
- Better respond to current needs, putting infrastructure first as far as possible.

2.12 For more information on the Local Plan progression and CIL collection and spending, please see our website [www.cotswold.gov.uk/CIL](http://www.cotswold.gov.uk/CIL).

### **3. FUNDING AVAILABLE FROM THE CIL SF FUND**

3.1 Some CIL SF funding has already been committed for the following successful bids in the 2024 bidding period. A large proportion of these funds has yet to be transferred to bidders due to the current spending procedure, which involves legal agreements.

Table 1- Previous Successful Bids- Allocated Funding

Scheme	Bidder	Amount Allocated (£)
Kemble to Steadings Greenway	Sustrans	180,301.00
Cirencester to Kemble Cycle Link	GCC / Sustrans	100,000.00
Bourton on the Water Interchange	GCC	137,700.00
Footpath in Moreton in Marsh	GCC	146,030.17
Forum Interchange Hub	GCC	66,300.00
Sherbourne Big Nature	National Trust	30,000.00
Total		660,331.17



3.2 The above bid funds have been secured and ring-fenced from the total CIL SF fund. 10% of the CIL SF fund is also ring-fenced on net receipts (less neighbourhood CIL) towards infrastructure for Climate and Ecological Emergencies (fund). Bids have also been received for the CEE fund, and these have been assessed according to their own criteria.

Table 2- Available CIL Funds

<b>Totals</b>	<b>Amounts (£)</b>
CIL SF held at end of bidding period	5,502,299.43
Of which Climate and Ecological Emergencies fund (CEE) (10%)	550,229.94
CIL SF total less CEE	4,952,069.49
2024 CIL SF successful bids	630,331.17
<b>2025 CIL SF available (less successful bids)</b>	<b>4,321,738.32</b>
2024 CEE successful bids	30,000.00
<b>2025 CEE fund available (less successful bids)</b>	<b>520,229.94</b>

3.3 The amount of funding requested this year has exceeded the total available SF fund. Table 3 below demonstrates this.

Table 3- Bid Totals

<b>Bids</b>	<b>Amounts (£)</b>
1a Cirencester LCWIP wayfinding	14,097.32
1b Cirencester LCWIP parallel crossing	109,731.48
2 Cycle parking CNC	27,700.00
3 Car club in Cirencester	56,880.00
4 Fairford Town Grassroots Growth Project	209,000.00
5 MiM Transport interchange hub	4,066,628.00
6 Farmor's School 3G pitch	723,006.00
7 Redesdale Hall Phase 2	200,000.00
8 Weston Sub Edge car park	20,000.00
<b>2025 CIL SF bid total</b>	<b>5,427,852.80</b>
2025 CIL SF Available	4,321,738.32
<b>2025 CIL SF Deficit</b>	<b>1,106,114.48</b>
9 CEE Grassland regeneration	100,000.00
10 CEE Take a stand cycle parking	25,000
<b>2025 CEE bid total</b>	<b>125,000.00</b>
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2025 CEE left over if all bids CEE bids approved	395,229.94



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6.3 There would necessarily be a reduction in current CIL SF balance, as set out in Table 5, however, this is continually topped up by CIL receipts which may.

Table 5- Available CIL receipts after funding approved bids

<b>Totals</b>	<b>Amounts (£)</b>
CIL SF available (less 2024 successful bids)	4,321,738.32
Successful Bid (Bid 2) Cycle parking CNC	27,700.00
Successful Bid (Bid 6) Farmor's School 3G Pitch	723,006.00
Successful Bid (Bid 7) Redesdale Hall Phase 2	200,000.00
<b>2025 CIL SF available (less successful bids)</b>	<b>3,371,032.32</b>

6.4 The amount of funding recommended this year is proportionate to the previous year's receipts and expected receipts for next year. The bids relate to capital projects, and there would be no revenue implications for the Council. The remaining CIL balance will be subject to bids for infrastructure in 2026, and any available funds can be used to contribute towards the delivery of infrastructure identified as critical to the emerging Local Plan. As set out in paragraph 2.6, recommendations for improvements to the governance and spending policy for CIL will be brought before Cabinet early next year.

## **7. LEGAL IMPLICATIONS**

7.1 The successful bids comply with the CIL legal requirements.

7.2 Legal services have provided template legal agreements, which will be signed and sealed before any funds are drawn down. These legal agreements contain reporting and other obligations for the bidders who intend to mitigate the risk of loss of the relevant CIL SF funding, and also provisions for clawback of unspent funds. The risk



of loss of CIL SF funding by relevant infrastructure projects not being delivered as agreed is limited and discrete.

## **8. RISK ASSESSMENT**

8.1 There are no significant risks to the Council in respect of CIL SF funding, other than the potential for external factors which might stymy the delivery of the infrastructure projects being delivered by the bidders (infrastructure stakeholders). This risk is discrete and isolated and is mitigated as above.

## **9. EQUALITIES IMPACT**

9.1 The infrastructure funded in part or in full by the CIL SF fund will meet the needs of a wide demographic of residents, and none of the projects funded would be inaccessible to any groups or individuals. The CIL SF funding has a positive impact on equality, and the needs of all groups were considered in decision-making (per the feedback forms).

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

10.1 The CIL SF includes a ring-fenced amount for climate and ecological emergencies infrastructure responses. Whilst no bids have been successful under this fund, the Infrastructure Delivery Team will continue to engage with potential stakeholders.

10.2 The majority of successful bids relate to sustainable transport and/or provide sustainable responses to meeting residents' needs. At present, it is not possible to quantify this impact, other than to recognise that reductions in carbon emissions from transport and air pollution are expected. (Include details of any climate and ecological emergency implications. There is also potential for energy use reduction via renewable energy sources. This will be determined by the detailed schemes as they are developed.

## **11. BACKGROUND PAPERS**

11.1 None

(END)

# Community Infrastructure Levy (CIL) Bid Panel Feedback Sheet

## Strategic Fund

CIL is for investment in infrastructure which meets local needs. It must be spent in the public interest and the rules around spending it are strict.

Bidders have been made aware of these requirements and several sought additional advice. Bidders who engaged with this process were given the opportunity to amend their bids according to the scoring matrix and officer advice.

This checklist will be provided as feedback to any unsuccessful bidders, so please ensure you fill in the boxes.

<b>Bid Name</b>	<b>Cirencester Local Cycling &amp; Walking Infrastructure Plan (LCWIP) Implementation</b>
<b>Bidder</b>	<b>Gloucestershire County Council (GCC)</b>
<b>Proposed infrastructure project</b>	<b>Installation of enhanced wayfinding signs and a road crossing on London Road East, Cirencester</b>
<b>Amount of bid</b>	<b>£14,097.32 for wayfinding, £109,731.48 design and delivery of parallel crossing (£124,638.80 total)</b>

### Question 1:

**Is the project identified in policies SA1, SA2 or SA3 of the adopted Cotswold District Local Plan as an essential or critical project?**

**~Total possible score: 20**

### Panel Advice for Question 1:

**This question addresses the STRATEGIC requirement.**

**The approach in these policies has moved on somewhat, so, if the project is not included in one of these policies but does refer to the overall aims and growth identified in the Local Plan, it may still attract a score of up to 10. Importantly, the project must have a STRATEGIC impact- so it must benefit a large number of residents or meet the needs of residents from more than one settlement.**

**The policies are:**

**Policy SA1 STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:

*Healthcare*

- Romney House Surgery, Tetbury - expansion or relocation; and
- New doctors' surgery in Cirencester.

*Flood management*

- SUDS and soft measure interventions to manage flood risk.

*Highways*

Junction improvements at:

- A429 / Cherrytree Lane, Cirencester;
- A417 (High Street) / A361 (Thames Street), Lechlade;
- A417 / Whelford Road, between Fairford and Lechlade;
- A429 / A433, between Cirencester and Kemble; and
- A433 (London Road / Long Street) / Hampton Street / New Church Street, Tetbury.

*Sport & Recreation*

- Re-use of the former Cirencester to Kemble and Tetbury to Kemble railway lines for cycling; and
- Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors

**Policy SA2 STRATEGIC DELIVERY - MID-COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the Mid-Cotswolds Sub-Area are:

Highways Improvement of Unicorn junction (A436/B4068), Stow-on-the-Wold

**Policy SA3 STRATEGIC DELIVERY - NORTH COTSWOLDS**

Within the context of Policy INF1, the strategic infrastructure requirements for the North Cotswolds Sub-Area are:

*Healthcare*

Expansion or replacement of doctors' surgery in Chipping Campden.

*Flood management*

Flood alleviation bund and channel to the north-west and south of Moreton-in-Marsh.

*Highways*

Improvements to A429 (Fosse Way),

Moreton-in-Marsh; Junction improvements at A429 (High Street)/A44 (Oxford Street),

Moreton-in-Marsh; and Junction improvements at A429 (High Street)/A44 (Bourton Road),

Moreton-in-Marsh.

*Education*

Expansion of Chipping Campden Secondary School.

**Question 1- Panel Feedback**

**Is the infrastructure project in policies SA1-3?**

**Yes  20 points / No**

<b>If answer is no-</b>
<b>Is the project strategic? Yes <input type="checkbox"/> capable of a score / No <input type="checkbox"/> 0 points</b>
<b>*a 0 score is an automatic disqualification for failure to meet the strategic test</b>
<b>Does the bid refer to other planning policies which support the need for the scheme?</b> <b>Yes <input type="checkbox"/> 5 points / No <input type="checkbox"/> 0 points</b>
<b>Does the project respond to infrastructure needs identified in other evidence-based studies?</b> <b>Yes <input type="checkbox"/> 5 points / No <input type="checkbox"/> 0 points</b>
<b>Reasons:</b> <i>Policy SA1 specifically refers to Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors. The improvements suggested in this bid meet therefore meet the strategic infrastructure requirements of the existing Local Plan and would do so in a sustainable way in line with the modal shift aspirations of both the Council and the County Council.</i>  <i>As the project is recognised in the strategic policies of the Local Plan, it automatically garners a full score of 20.</i>
<b>Question 1 total score:</b> <b>20/20</b>

<b>Question 2:</b>
<b>Is the project identified in the IFS as a CIL spending priority? If not, is there sufficient justification to fund a project that is not on the priority list?</b>
<b>~Total possible score: 20</b>
<b>Panel Advice for Question 2:</b>
<b>This question remains in our matrix and needs to be answered, despite the age of the IFS.</b>

**The aim of the question is the **LEGAL** requirement for CIL spending-  
*Regulation 59 of the Community Infrastructure Regulations 2010 (as amended) requires that CIL is spent to fund infrastructure which supports the development of its area.***

Our IFS list originated in 2016 (it's based on the Infrastructure Delivery Plan (IDP)). Back then, we identified infrastructure needed to support the housing and employment development in our Local Plan. It is a short list to increase road capacity to deal with the additional traffic from housing. In 2019, we declared a climate emergency and now prefer sustainable travel over private traffic/ road improvements. The list also doesn't address other non-transport related infrastructure needs for healthy and sustainable communities.

The last IFS acknowledged made an important caveat-

*"The Council's focus has changed towards sustainable transport and enabling the modal shift away from car use as the main form of transport. Infrastructure projects that alleviate the pressure on these junctions via sustainable means are therefore preferred over projects that directly increase highway capacity as currently listed".*

It's therefore important that you understand that not being included on the IFS list should not preclude bids. However, bids **MUST** show that they address the infrastructure needs arising from growth. We've broken this question down to help you answer it.

#### **The IFS List-**

<b>Parish</b>	<b>Project</b>
<b>Kemble</b>	<b>Junction improvements at A429/ A433, between Cirencester and Kemble</b>
<b>Kemble</b>	<b>Re-use of the former railway line for cycling (successful bid 2024)</b>
<b>Lechlade</b>	<b>Junction improvements at A417/ Whelford Road between Fairford and Lechlade</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (Fosseway)</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Oxford Street)</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Bourton Road)</b>
<b>Stow-on-the-Wold</b>	<b>Improvement of Unicorn junction (A436/B4068)</b>
<b>Tetbury</b>	<b>Junction improvements at A433 (London Road/ Long Street) / Hampton Street/ New Church Street</b>

<b>South Cotswolds</b>	<b>SUDS and soft measure interventions to manage flood risk</b>
<b>To determine whether the project responds to growth, you should discuss-</b>	
<ul style="list-style-type: none"><li>▪ Does it respond to increased population (or increased in demographic groups such as children, older people or disabled people) by increasing the capacity of quality of existing services, or providing new services?</li><li>▪ Has the bid identified where that growth has come from/ evidenced it?<ul style="list-style-type: none"><li>○ Have they referred to particular development?</li><li>○ Have they referred to any infrastructure evidence studies?</li></ul></li><li>▪ Has the bid identified <i>how</i> it will provide that service to our residents-<ul style="list-style-type: none"><li>○ Will it be open and accessible to the public now and into the future? i.e. is it free or chargeable, if chargeable, where is the revenue going? <b>FYI- Private companies gaining profit are NOT providing infrastructure to the public and cannot be considered for bids.</b></li><li>○ Does it explain how it will meet current and future needs?</li><li>○ What outreach/ advertising or other public engagement is planned?</li></ul></li></ul>	
<b>Question 2- Panel Feedback</b>	
<b>Is the infrastructure project on the IFS list?</b> <b>Yes <input type="checkbox"/> 20 points / No <input checked="" type="checkbox"/> 0 points</b>	
<b>OR- If answer is no-</b>	
<b>Is the project for sustainable transport, walking or cycling?</b> <b>Yes <input checked="" type="checkbox"/> 5 points / No <input type="checkbox"/> 0 points</b>	
<b>Does the project respond to growth?</b>	<b>Score 3 points (0-5)</b>
<b>*a 0 score is an automatic disqualification for failure to meet the legal test</b>	
<b>Reasons:</b>  The panel is pleased to have a sustainable pedestrian scheme to consider, which aligns with the spatial strategy and is included in the LCWIP.  The panel would like to have seen greater detail to demonstrate why the works met specific local needs.	

Nonetheless, the panel felt the aims of the scheme were clear and from a policy point of view, the scheme would be responding to development in the area, in compliance with the legal test for CIL.

**Question 2 total score:**  
**8/20**

**Question 3:**

**Have you secured match funding to increase potential outputs from the project?**

**~Total possible score: 20**

**Panel Advice for Question 3:**

**This question addresses the RESPONSIBILITY requirement.**

**Community Infrastructure Levy funds are to be used for the public benefit. It is important that we can demonstrate that the investment of public money in the project provides services people need and value for money. Match-funding is one element of this, but sometimes match funding is not available.**

**You should consider:**

**Is the cost of the scheme justified?** i.e. Is there proof of different quotes? does the cost appear reasonably proportionate? Has the bidder provided any due-diligence information/ enough financial information?

**Does the project offer value for money?** i.e. is the amount of CIL investment balanced with the urgency, importance and scale of the community's need? Has match-funding been explored as an option?

**Does the project secure infrastructure for people now and in the future?** i.e. how long will the project serve the public? Is that balanced with the amount of investment? Does the bidder control the land and/or infrastructure asset that will result from the investment so that we can be confident it will remain open to the public?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)

- **Contingency or 'just in case' additional** funds (we cannot provide public money which may not be spent).

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

### Question 3- Panel Feedback

**Has match-funding been secured?**

Yes  10 points / No  0 points

OR

**Has the bid examined all funding possibilities and robustly justified why these have not been pursued?**

Yes  5 points / No  0 points

**Is the cost of the scheme justified, and does it offer value for money?**

**Score 2 (0-10 points)**

**\*a 0 score is an automatic disqualification for failure to meet the responsibility test**

#### Reasons:

The panel is concerned about the proportionality of the cost of the crossing at £124,638.80. The panel feels that this costing has not been justified and the scheme as currently presented offers poor value for CIL money.

The panel would have liked to consider this bid with additional cost-justification/ a cost review. In particular, the panel would have liked to have seen:

- Examination of alternative or match funding.
- Detail of what projected population size / vehicle movement reduction/ safety implications that this scheme would have an impact on.
- Costed examples of how much a crossing of this type would usually cost.
- Explanation as to why the Traffic Management Cost is the same for pedestrian signs as the parallel crossing.
- Justification as to why a Preliminary Ecology Assessment has been included (in the professional opinion of the ecologists on the panel, this inclusion is unnecessary and unusual).
- Justification as to why the County Council is seeking TRO funding. Similarly query whether the RSA could be covered by in-house staff. Would also like information as to what the engineering fees are. As the panel members understand it, this is within part of the County Council's day-to-day functions. The panel would like to understand why public money is sought via CIL funding as if this scheme were being carried out on a private basis

rather than as a County Council led LCWIP implementation. The panel specifically wishes to question whether the TRO and Traffic Management are in any way covering County Council staff costs.

- In general, the panel observe that the additional add-ons seem to greatly inflate the costs.

The panel feels that insufficient information and justification is available to determine whether the cost is proportionate and therefore whether this scheme would offer the public good value for money.

Question 3 total score:

2/ 20

#### **Question 4:**

**Is the project deliverable and what is the time frame? Have you considered alternative options to deliver the outcome of your project? Are enough CIL funds currently available?**

**~Total possible score: 30**

#### **Panel Advice for Question 4:**

**This group of questions address the ACCOUNTABILITY requirement. If we are investing public money in infrastructure projects, we have to be certain that the project can and will go ahead. This means understanding when and how the project will be delivered, who will be accountable and whether it is properly funded.**

#### **You should consider:**

**Is the project deliverable?** I.e. has the bidder provided a project plan? Are there clear roles and responsibilities? Is there a timescale involved? Does the bidder have a track record of delivering similar projects or can then point to similar feasible examples? Does the bid explain how the providers will report progress back to the Council?

**Has the bid considered alternative options?** Is the bid the best and most effective route for meeting the needs identified? This is particularly important where there are competing bids for similar infrastructure, or where the scheme seeks a large investment into infrastructure which is to meet future needs (are the needs known and is the extent of investment justified?). Aside from the match-funding question, is CIL the best route for this infrastructure- are there other responsible bodies who could provide this infrastructure?

**Are enough CIL funds currently available?**

**This can automatically exclude bids.** If there is sufficient funding, but the scheme seeks a large financial investment of CIL- does the bid phase the development so that CIL funding can be drawn down only when required? Does the bid provide for future revenue to maintain the infrastructure into the future (the greater the investment, the longer term the infrastructure maintenance should be secured)?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent). We can allocate money for contingency funding, on the basis that a separate request for the money will need to be made alongside proof of the additional cost/ spend. Contingency costs must be noted.

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

**Question 4- Panel Feedback**

**Is the project deliverable?**

Yes  Score 0-10 points 10 / No  0

**\*a 0 score is an automatic disqualification**

**Has the bid considered alternative options?**

Yes  Score 0-10 points \_\_\_\_\_ / No  0

**Are there enough CIL funds available?**

Yes  Score 0-10 points 5 / No  0

**\*a 0 score is an automatic disqualification**

**Are there any costs which should not be included?** Yes  No

**If yes, specify-**

Contingency funds of 40% on each item:

£2,264.53 on wayfinding

£22,510.05 on parallel crossing.

Additional costs which may be unnecessary, per comments to Question 3 above.

**Reasons:**

The panel recognises that the County Council has a good and well-established record of delivering schemes of this type and therefore opts to give full points in respect of the deliverability of the scheme.

The panel recognises that there may be limited alternative options for meeting the need that this scheme would address, however, the panel feels that cost-effective alternatives to the scheme and a better explanation of the necessity of the scheme in its current form should have been provided. Given that this was not addressed at all (and the panel's concerns regarding the overall cost as outlined above), the panel feels unable to award a score in this respect.

There are enough CIL funds available for this scheme when considered in isolation, however, the bids received in 2025 exceeds the current balance of CIL in their totality. Balanced with the queries around costing, the panel opts to award a score of 5/10 in respect of this aspect of value for money.

The panel also notes as above that contingency fees cannot be paid out up-front and would be removed from any initial transfer of funds should the bid be successful. Evidence would then need to be provided to justify the draw-down of additional funds should the project cost more to implement than anticipated. On the point of value for money, the panel also feels that this scheme would be a relatively small scheme with limited risk associated and as such, would have appreciated further justification for the 40% contingency rate.

**Question 4 total score:**

**15/30**

**Summary Panel Feedback**

**Has the bid been disqualified?** Yes  No

**Total score 45/100**

**Recommendation for funding?** Yes  No

**Any costs to be removed?** Yes  No

**If yes, please specify-**

See question 3 and 4 response above.

<b>Total recommended for funding (if applicable) 0</b>
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<b>Overall feedback for bidder:</b>
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<p>The panel welcomes this bid, which relates to existing policy and strategic objectives. The panel feels that the infrastructure bid for is one of the types of infrastructure that could be well delivered via CIL (and other match funding/statutory undertaker functions). In general, the panel would like to recognise this infrastructure as 'a good idea', however, the panel feels that the bid failed to provide the detail needed to justify the scale of cost, particularly given the limited availability of funds.</p>
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## Community Infrastructure Levy (CIL) Bid Panel Feedback Sheet

### Strategic Fund

CIL is for investment in infrastructure which meets local needs. It must be spent in the public interest and the rules around spending it are strict.

Bidders have been made aware of these requirements and several sought additional advice. Bidders who engaged with this process were given the opportunity to amend their bids according to the scoring matrix and officer advice.

This checklist will be provided as feedback to any unsuccessful bidders, so please ensure you fill in the boxes.

<b>Bid Name</b>	<b>Cycle parking Cotswold National Cycle Network (NCN)</b>
<b>Bidder</b>	<b>Gloucestershire County Council (GCC) and Sustrans (now Walk Wheel Cycle Trust)</b>
<b>Proposed infrastructure project</b>	<b>Cycle parking facilities across network settlement hubs.</b>
<b>Amount of bid</b>	<b>£27,000.00</b>

#### Question 1:

**Is the project identified in policies SA1, SA2 or SA3 of the adopted Cotswold District Local Plan as an essential or critical project?**

**~Total possible score: 20**

#### Panel Advice for Question 1:

**This question addresses the STRATEGIC requirement.**

**The approach in these policies has moved on somewhat, so, if the project is not included in one of these policies but does refer to the overall aims and growth identified in the Local Plan, it may still attract a score of up to 10. Importantly, the project must have a STRATEGIC impact- so it must benefit a large number of residents or meet the needs of residents from more than one settlement.**

**The policies are:**

**Policy SA1 STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:

*Healthcare*

- Romney House Surgery, Tetbury - expansion or relocation; and
- New doctors' surgery in Cirencester.

*Flood management*

- SUDS and soft measure interventions to manage flood risk.

*Highways*

Junction improvements at:

- A429 / Cherrytree Lane, Cirencester;
- A417 (High Street) / A361 (Thames Street), Lechlade;
- A417 / Whelford Road, between Fairford and Lechlade;
- A429 / A433, between Cirencester and Kemble; and
- A433 (London Road / Long Street) / Hampton Street / New Church Street, Tetbury.

*Sport & Recreation*

- Re-use of the former Cirencester to Kemble and Tetbury to Kemble railway lines for cycling; and
- Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors

**Policy SA2 STRATEGIC DELIVERY - MID-COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the Mid-Cotswolds Sub-Area are:

Highways Improvement of Unicorn junction (A436/B4068), Stow-on-the-Wold

**Policy SA3 STRATEGIC DELIVERY - NORTH COTSWOLDS**

Within the context of Policy INF1, the strategic infrastructure requirements for the North Cotswolds Sub-Area are:

*Healthcare*

Expansion or replacement of doctors' surgery in Chipping Campden.

*Flood management*

Flood alleviation bund and channel to the north-west and south of Moreton-in-Marsh.

*Highways*

Improvements to A429 (Fosse Way),

Moreton-in-Marsh; Junction improvements at A429 (High Street)/A44 (Oxford Street),

Moreton-in-Marsh; and Junction improvements at A429 (High Street)/A44 (Bourton Road),

Moreton-in-Marsh.

*Education*

Expansion of Chipping Campden Secondary School.

**Question 1- Panel Feedback**

**Is the infrastructure project in policies SA1-3?**

**Yes  20 points / No**

<b>If answer is no-</b>
<b>Is the project strategic? Yes <input type="checkbox"/> capable of a score / No <input type="checkbox"/> 0 points</b>
<b>*a 0 score is an automatic disqualification for failure to meet the strategic test</b>
<b>Does the bid refer to other planning policies which support the need for the scheme?</b> <b>Yes <input type="checkbox"/> 5 points / No <input type="checkbox"/> 0 points</b>
<b>Does the project respond to infrastructure needs identified in other evidence-based studies?</b> <b>Yes <input type="checkbox"/> 5 points / No <input type="checkbox"/> 0 points</b>
<b>Reasons:</b>  <i>This proposal would provide for cycle parking facilities across the District, in line with the aims of Policies SA1-3. Policy SA1 specifically refers to Cycling infrastructure in Cirencester. Whilst policies SA2-3 refer to road junction improvements, the panel considers that the proposal meets the overall aims of improving connectivity generally, albeit by non-private car means. The improvements suggested in this bid meet therefore meet the strategic infrastructure requirements of the existing Local Plan in a sustainable way in line with the modal shift aspirations of both the Council and the County Council.</i>  <i>As the project is recognised in the strategic policies of the Local Plan, it automatically garners a full score of 20.</i>
<b>Question 1 total score:</b> 20/20

<b>Question 2:</b>
<b>Is the project identified in the IFS as a CIL spending priority? If not, is there sufficient justification to fund a project that is not on the priority list?</b>
<b>~Total possible score: 20</b>

**Panel Advice for Question 2:**

**This question is outdated but remains in our matrix and needs to be answered.**

**The real aim of the question is the LEGAL requirement for CIL spending-  
*Regulation 59 of the Community Infrastructure Regulations 2010 (as amended) requires that CIL is spent to fund infrastructure which supports the development of its area.***

Our IFS list originated in 2016 (it's based on the Infrastructure Delivery Plan (IDP)). Back then, we identified infrastructure needed to support the housing and employment development in our Local Plan. It is a short list to increase road capacity to deal with the additional traffic from housing. In 2019, we declared a climate emergency and now prefer sustainable travel over private traffic/ road improvements. The list also doesn't address other non-transport related infrastructure needs for healthy and sustainable communities.

The last IFS acknowledged made an important caveat-  
"The Council's focus has changed towards sustainable transport and enabling the modal shift away from car use as the main form of transport. Infrastructure projects that alleviate the pressure on these junctions via sustainable means are therefore preferred over projects that directly increase highway capacity as currently listed".

It's therefore important that you understand that not being included on the IFS list should not preclude bids. However, bids MUST show that they address the infrastructure needs arising from growth. We've broken this question down to help you answer it.

**The IFS List-**

Parish	Project
Kemble	<b>Junction improvements at A429/ A433, between Cirencester and Kemble</b>
Kemble	<b>Re-use of the former railway line for cycling (successful bid 2024)</b>
Lechlade	<b>Junction improvements at A417/ Whelford Road between Fairford and Lechlade</b>
Moreton-in-Marsh	<b>Junction improvements at A429 (Fosseway)</b>
Moreton-in-Marsh	<b>Junction improvements at A429 (High Street)/ A44 (Oxford Street)</b>
Moreton-in-Marsh	<b>Junction improvements at A429 (High Street)/ A44 (Bourton Road)</b>

<b>Stow-on-the-Wold</b>	<b>Improvement of Unicorn junction (A436/B4068)</b>
<b>Tetbury</b>	<b>Junction improvements at A433 (London Road/ Long Street) / Hampton Street/ New Church Street</b>
<b>South Cotswolds</b>	<b>SUDS and soft measure interventions to manage flood risk</b>

**To determine whether the project responds to growth, you should discuss-**

- Does it respond to increased population (or increased in demographic groups such as children, older people or disabled people) by increasing the capacity of quality of existing services, or providing new services?
- Has the bid identified where that growth has come from/ evidenced it?
  - Have they referred to particular development?
  - Have they referred to any infrastructure evidence studies?
- Has the bid identified *how* it will provide that service to our residents-
  - Will it be open and accessible to the public now and into the future? i.e. is it free or chargeable, if chargeable, where is the revenue going?  
**FYI- Private companies gaining profit are NOT providing infrastructure to the public and cannot be considered for bids.**
  - Does it explain how it will meet current and future needs?
  - What outreach/ advertising or other public engagement is planned?

## Question 2- Panel Feedback

**Is the infrastructure project on the IFS list?**

**Yes  20 points / No  0 points**

**OR- If answer is no-**

**Is the project for sustainable transport, walking or cycling?**

**Yes  5 points / No  0 points**

**Does the project respond to growth?**

**Score 0-10 points \_8**

**\*a 0 score is an automatic disqualification for failure to meet the legal test**

### **Reasons:**

The panel welcomes this sustainable transport cycling scheme, which aligns with the spatial strategy and meets objectives in the LCWIP.

The panel considers the proposal to be a well evidenced response to demonstrated needs. The proposal appears to take a targeted and wide-reaching approach which is focussed on identified growth hubs. The panel particularly notes that the scheme covers most of district.

The panel is pleased to see the scheme is supported by local statistics and detailed evidence and commends the bidders for the quality of this element of the bid.

The panel has no doubts that the scheme would meet the legal test for CIL investment. The car parking specialist members of the panel would like it noted that there is often an assumption that cycle stands and lockers are located within car parks, however, this should be actively discouraged as it reduces the overall number of available spaces and car parks are not the ideal place for bicycle storage. The panel would encourage further liaison with the bidder and car park providers/ the Council's car-parking team regarding the locations of these facilities.

**Question 2 total score:**  
**13/ 20**

**Question 3:**

**Have you secured match funding to increase potential outputs from the project?**

**~Total possible score: 20**

**Panel Advice for Question 3:**

**This question addresses the RESPONSIBILITY requirement.**  
**Community Infrastructure Levy funds are to be used for the public benefit. It is important that we can demonstrate that the investment of public money in the project provides services people need and value for money. Match-funding is one element of this, but sometimes match funding is not available.**

**You should consider:**

**Is the cost of the scheme justified?** i.e. Is there proof of different quotes? does the cost appear reasonably proportionate? Has the bidder provided any due-diligence information/ enough financial information?

**Does the project offer value for money?** i.e. is the amount of CIL investment balanced with the urgency, importance and scale of the community's need? Has match-funding been explored as an option?

**Does the project secure infrastructure for people now and in the future? i.e.** how long will the project serve the public? Is that balanced with the amount of investment? Does the bidder control the land and/or infrastructure asset that will result from the investment so that we can be confident it will remain open to the public?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent).

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

**Question 3- Panel Feedback**

**Has match-funding been secured?**

Yes  10 points / No  0 points

OR

**Has the bid examined all funding possibilities and robustly justified why these have not been pursued?**

Yes  5 points / No  0 points

**Is the cost of the scheme justified, and does it offer value for money?**

**Score 8 (0-10 points)**

**\*a 0 score is an automatic disqualification for failure to meet the responsibility test**

**Reasons:**

The cost to benefit of this scheme has been well-evidenced. Whilst detail around match-funding opportunities would have been desirable and should be embedded into future bids from this bidder, the panel nonetheless considers the overall funding ask is reasonable and proportionate to the scheme. As such, the bid garners a robust score from its justification.

The justification of cost did not receive a full score, as the panel would query whether the secure cycle parking would become self-sustaining over time.

Question 3 total score: 8 / 20
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#### Question 4:

**Is the project deliverable and what is the time frame? Have you considered alternative options to deliver the outcome of your project? Are enough CIL funds currently available?**

**~Total possible score: 30**

#### Panel Advice for Question 4:

**This group of questions address the ACCOUNTABILITY requirement. If we are investing public money in infrastructure projects, we have to be certain that the project can and will go ahead. This means understanding when and how the project will be delivered, who will be accountable and whether it is properly funded.**

#### You should consider:

**Is the project deliverable?** I.e. has the bidder provided a project plan? Are there clear roles and responsibilities? Is there a timescale involved? Does the bidder have a track record of delivering similar projects or can then point to similar feasible examples? Does the bid explain how the providers will report progress back to the Council?

**Has the bid considered alternative options?** Is the bid the best and most effective route for meeting the needs identified? This is particularly important where there are competing bids for similar infrastructure, or where the scheme seeks a large investment into infrastructure which is to meet future needs (are the needs known and is the extent of investment justified?). Aside from the match-funding question, is CIL the best route for this infrastructure- are there other responsible bodies who could provide this infrastructure?

#### Are enough CIL funds currently available?

**This can automatically exclude bids.** If there is sufficient funding, but the scheme seeks a large financial investment of CIL- does the bid phase the development so that CIL funding can be drawn down only when required? Does the bid provide for future revenue to maintain the infrastructure into the future (the greater the investment, the longer term the infrastructure maintenance should be secured)?

#### Bids should NOT include funding for:

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional** funds (we cannot provide public money which may not be spent). We can allocate money for contingency funding, on the basis that a separate request for the money will need to be made alongside proof of the additional cost/ spend. Contingency costs must be noted.

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

#### Question 4- Panel Feedback

##### **Is the project deliverable?**

**Yes**  **Score 0-10 points** 9 / **No**  **0**

**\*a 0 score is an automatic disqualification**

##### **Has the bid considered alternative options?**

**Yes**  **Score 0-10 points** 5 / **No**  **0**

##### **Are there enough CIL funds available?**

**Yes**  **Score 0-10 points** 9 / **No**  **0**

**\*a 0 score is an automatic disqualification**

**Are there any costs which should not be included?** **Yes**  **No**

##### **If yes, specify-**

An unclear amount of contingency has been added.

##### **Reasons:**

The panel recognises that the County Council has a good and well-established record of delivering schemes of this type and that it has a good working relationship with the Walk, Wheel and Cycle Trust (WWCT). The WWCT also has a good record of facilitating such schemes. The panel opts to give just shy of full points due to the query above regarding locations for the facilities.

The panel was satisfied that alternative options had been touched upon within the bid and accordingly awarded a mid-score.

There are enough CIL funds available for this scheme when considered in isolation, however, the bids received in 2025 exceeds the current balance of CIL in their totality. Nonetheless, this scheme has a relatively low and proportionate funding ask, and as such the panel opts to give just shy of full points in this respect.

An unclear amount of contingency has been added, which will need to be identified and separated out. The panel also notes as above that contingency fees cannot be paid out up-front and would be removed from any initial transfer of funds should the bid be successful. Evidence would then need to be provided to justify the draw-down of additional funds should the project cost more to implement than anticipated. The panel would have liked to have seen contingency clearly earmarked and shown as a proportion of the overall costing.

**Question 4 total score:**

**23/30**

**Summary Panel Feedback**

**Has the bid been disqualified?** Yes  No

**Total score** 63/100

**Recommendation for funding?** Yes  No

**Any costs to be removed?** Yes  No

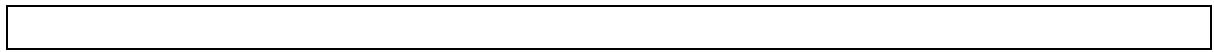
**If yes, please specify-**

Contingency fees must be noted. They can be included as a separate total for a later draw-down.

**Total recommended for funding (if applicable)** £27,000.00 (contingency arrangements)

**Overall feedback for bidder:**

The panel would like to thank the bidders for this detailed and well justified bid. The panel feels the bid has been well structured. The panel is pleased to recommend the scheme for funding and looks forward to seeing positive outcomes. The panel would like to invite the bidders to engage with the Council regarding the locations of the facilities.



# Community Infrastructure Levy (CIL) Bid Panel Feedback Sheet

## Strategic Fund

CIL is for investment in infrastructure which meets local needs. It must be spent in the public interest and the rules around spending it are strict.

Whilst each bidder has been made aware of these requirements and has been given the opportunity to amend their bids according to the scoring matrix and officer advice.

This checklist will be provided as feedback to any unsuccessful bidders, so please ensure you fill in the boxes.

<b>Bid Name</b>	<b>Car club provision in Cirencester</b>
<b>Bidder</b>	<b>Gloucestershire County Council (GCC)</b>
<b>Proposed infrastructure project</b>	<b>Shared E-vehicle car club</b>
<b>Amount of bid</b>	<b>£56,880.00</b>

### Question 1:

**Is the project identified in policies SA1, SA2 or SA3 of the adopted Cotswold District Local Plan as an essential or critical project?**

**~Total possible score: 20**

### Panel Advice for Question 1:

**This question addresses the STRATEGIC requirement.**

**The approach in these policies has moved on somewhat, so, if the project is not included in one of these policies but does refer to the overall aims and growth identified in the Local Plan, it may still attract a score of up to 10. Importantly, the project must have a STRATEGIC impact- so it must benefit a large number of residents or meet the needs of residents from more than one settlement.**

**The policies are:**

#### **Policy SA1 STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:

*Healthcare*

- Romney House Surgery, Tetbury - expansion or relocation; and
- New doctors' surgery in Cirencester.

*Flood management*

- SUDS and soft measure interventions to manage flood risk.

#### *Highways*

Junction improvements at:

- A429 / Cherrytree Lane, Cirencester;
- A417 (High Street) / A361 (Thames Street), Lechlade;
- A417 / Whelford Road, between Fairford and Lechlade;
- A429 / A433, between Cirencester and Kemble; and
- A433 (London Road / Long Street) / Hampton Street / New Church Street, Tetbury.

#### *Sport & Recreation*

- Re-use of the former Cirencester to Kemble and Tetbury to Kemble railway lines for cycling; and
- Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors

#### **Policy SA2 STRATEGIC DELIVERY - MID-COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the Mid-Cotswolds Sub-Area are:

Highways Improvement of Unicorn junction (A436/B4068), Stow-on-the-Wold

#### **Policy SA3 STRATEGIC DELIVERY - NORTH COTSWOLDS**

Within the context of Policy INF1, the strategic infrastructure requirements for the North Cotswolds Sub-Area are:

#### *Healthcare*

Expansion or replacement of doctors' surgery in Chipping Campden.

#### *Flood management*

Flood alleviation bund and channel to the north-west and south of Moreton-in-Marsh.

#### *Highways*

Improvements to A429 (Fosse Way),

Moreton-in-Marsh; Junction improvements at A429 (High Street)/A44 (Oxford Street),

Moreton-in-Marsh; and Junction improvements at A429 (High Street)/A44 (Bourton Road),

Moreton-in-Marsh.

#### *Education*

Expansion of Chipping Campden Secondary School.

#### **Question 1- Panel Feedback**

##### **Is the infrastructure project in policies SA1-3?**

**Yes  20 points / No**

**If answer is no-**

**Is the project strategic? Yes  capable of a score / No  0 points**

**\*a 0 score is an automatic disqualification for failure to meet the strategic test**

**Does the bid refer to other planning policies which support the need for the scheme?**

**Yes  5 points / No  0 points**

**Does the project respond to infrastructure needs identified in other evidence-based studies?**

**Yes  5 points / No  0 points**

**Reasons:**

The scheme is not included in policies SA1-3. The panel acknowledges that car share schemes can reduce ownership of private vehicles and encourage use of sustainable modes of transport, limiting use of private cars/ vehicles. The approach to transport following the declaration of the climate emergencies by the District and County Councils is to prioritise infrastructure schemes which encourage modal shift to reduce the impact on roads. The panel also acknowledges that car share schemes are capable of being strategic in scale and offer.

However, the panel is not persuaded by the detail of the bid that the scheme as currently proposed is strategic in nature, as it appears only to secure the provision of a single EV vehicle, providing a very limited offer in terms of quantity and geographical reach. The panel does not consider this to meet the needs of growth or aims of the policies.

The panel notes that the bid refers to potential up-scaling the EV vehicle share project over time, however, the bid does not make any provision of plan for doing so. The panel is concerned that the investment in the scheme appears to only fund a single vehicle for set period, without providing or planning for succession/growth towards a strategic impact.

The panel's finding results in the bid being disqualified in its current scheme. The panel is mindful that the bid may come forward again in other bidding periods, and so it has made some limited (not exhaustive) additional comments on the other questions, to assist with any future bids.

<b>Question 1 total score:</b> <b>Disqualification 0 / 20</b>
--

**Question 2:**

**Is the project identified in the IFS as a CIL spending priority? If not, is there sufficient justification to fund a project that is not on the priority list?**

**~Total possible score: 20**

**Panel Advice for Question 2:**

**This question is outdated but remains in our matrix and needs to be answered.**

**The real aim of the question is the LEGAL requirement for CIL spending- *Regulation 59 of the Community Infrastructure Regulations 2010 (as amended) requires that CIL is spent to fund infrastructure which supports the development of its area.***

Our IFS list originated in 2016 (it's based on the Infrastructure Delivery Plan (IDP)). Back then, we identified infrastructure needed to support the housing and employment development in our Local Plan. It is a short list to increase road capacity to deal with the additional traffic from housing. In 2019, we declared a climate emergency and now prefer sustainable travel over private traffic/ road improvements. The list also doesn't address other non-transport related infrastructure needs for healthy and sustainable communities.

The last IFS acknowledged made an important caveat- "The Council's focus has changed towards sustainable transport and enabling the modal shift away from car use as the main form of transport. Infrastructure projects that alleviate the pressure on these junctions via sustainable means are therefore preferred over projects that directly increase highway capacity as currently listed".

It's therefore important that you understand that not being included on the IFS list should not preclude bids. However, bids MUST show that they address the infrastructure needs arising from growth. We've broken this question down to help you answer it.

**The IFS List-**

Parish	Project
Kemble	<b>Junction improvements at A429/ A433, between Cirencester and Kemble</b>
Kemble	<b>Re-use of the former railway line for cycling (successful bid 2024)</b>
Lechlade	<b>Junction improvements at A417/ Whelford Road between Fairford and Lechlade</b>
Moreton-in-Marsh	<b>Junction improvements at A429 (Fosseway)</b>
Moreton-in-Marsh	<b>Junction improvements at A429 (High Street)/ A44 (Oxford Street)</b>
Moreton-in-Marsh	<b>Junction improvements at A429 (High Street)/ A44 (Bourton Road)</b>
Stow-on-the-Wold	<b>Improvement of Unicorn junction (A436/B4068)</b>
Tetbury	<b>Junction improvements at A433 (London Road/ Long Street) / Hampton Street/ New Church Street</b>
South Cotswolds	<b>SUDS and soft measure interventions to manage flood risk</b>

**To determine whether the project responds to growth, you should discuss-**

- Does it respond to increased population (or increased in demographic groups such as children, older people or disabled people) by increasing the capacity of quality of existing services, or providing new services?
- Has the bid identified where that growth has come from/ evidenced it?
  - Have they referred to particular development?
  - Have they referred to any infrastructure evidence studies?
- Has the bid identified *how* it will provide that service to our residents-
  - Will it be open and accessible to the public now and into the future? i.e. is it free or chargeable, if chargeable, where is the revenue going?  
**FYI- Private companies gaining profit are NOT providing infrastructure to the public and cannot be considered for bids.**
  - Does it explain how it will meet current and future needs?
  - What outreach/ advertising or other public engagement is planned?

**Question 2- Panel Feedback**

**Is the infrastructure project on the IFS list?**

**Yes  20 points / No  0 points**

<b>OR- If answer is no-</b>
<b>Is the project for sustainable transport, walking or cycling?</b> Yes <input checked="" type="checkbox"/> 5 points / No <input type="checkbox"/> 0 points
<b>Does the project respond to growth?</b> <span style="float: right;">Score 0-10 points _____</span>
<b>*a 0 score is an automatic disqualification for failure to meet the legal test</b>
<b>Reasons:</b>  No further comments from panel at this time.
<b>Question 2 total score:</b> n/a

<b>Question 3:</b>
<b>Have you secured match funding to increase potential outputs from the project?</b>
<b>~Total possible score: 20</b>
<b>Panel Advice for Question 3:</b>
<p><b>This question addresses the RESPONSIBILITY requirement.</b> <b>Community Infrastructure Levy funds are to be used for the public benefit. It is important that we can demonstrate that the investment of public money in the project provides services people need and value for money. Match-funding is one element of this, but sometimes match funding is not available.</b></p>
<b>You should consider:</b>
<p><b>Is the cost of the scheme justified?</b> i.e. Is there proof of different quotes? does the cost appear reasonably proportionate? Has the bidder provided any due-diligence information/ enough financial information?</p>
<p><b>Does the project offer value for money?</b> i.e. is the amount of CIL investment balanced with the urgency, importance and scale of the community's need? Has match-funding been explored as an option?</p>
<p><b>Does the project secure infrastructure for people now and in the future?</b> i.e. how long will the project serve the public? Is that balanced with the amount of investment? Does the bidder control the land and/or infrastructure asset that will</p>

result from the investment so that we can be confident it will remain open to the public?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent).

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

**Question 3- Panel Feedback**

**Has match-funding been secured?**

Yes  10 points / No  0 points

OR

**Has the bid examined all funding possibilities and robustly justified why these have not been pursued?**

Yes  5 points / No  0 points

**Is the cost of the scheme justified, and does it offer value for money?**

**Score 0-10 points \_0\_**

**\*a 0 score is an automatic disqualification for failure to meet the responsibility test**

**Reasons:**

The panel's finding results in the bid being disqualified in its current scheme.

The panel comments that the value for money is not justified, if over the period of 5 years the bid would simply provide a single car without response to growth. There is no clear strategy for scaling the scheme up.

The panel is concerned that this scheme seems to be a private investment scheme into a for-profit company. In which case, whilst the scheme may be meritorious, it would not be appropriate to use CIL to kick-start a privately owned scheme. The panel would have appreciated reassurance in the financial break down and governance detailing of this bid.

The panel felt the overall costing could have been made clearer in general (i.e. understanding exactly what was being funded).

The bid failed to provide any evaluation of potential match-funding or alternatives, other than GCC officer time, offered in-kind. That in-kind offer was then included in the total costs requested from CIL.

Question 3 total score:

**Disqualification 0**

#### **Question 4:**

**Is the project deliverable and what is the time frame? Have you considered alternative options to deliver the outcome of your project? Are enough CIL funds currently available?**

**~Total possible score: 30**

#### **Panel Advice for Question 3:**

**This group of questions address the ACCOUNTABILITY requirement. If we are investing public money in infrastructure projects, we have to be certain that the project can and will go ahead. This means understanding when and how the project will be delivered, who will be accountable and whether it is properly funded.**

#### **You should consider:**

**Is the project deliverable?** I.e. has the bidder provided a project plan? Are there clear roles and responsibilities? Is there a timescale involved? Does the bidder have a track record of delivering similar projects or can then point to similar feasible examples? Does the bid explain how the providers will report progress back to the Council?

**Has the bid considered alternative options?** Is the bid the best and most effective route for meeting the needs identified? This is particularly important where there are competing bids for similar infrastructure, or where the scheme seeks a large investment into infrastructure which is to meet future needs (are the needs known and is the extent of investment justified?). Aside from the match-funding question, is CIL the best route for this infrastructure- are there other responsible bodies who could provide this infrastructure?

#### **Are enough CIL funds currently available?**

**This can automatically exclude bids.** If there is sufficient funding, but the scheme seeks a large financial investment of CIL- does the bid phase the development so that CIL funding can be drawn down only when required? Does the bid provide for future revenue to maintain the infrastructure into the future (the greater the investment, the longer term the infrastructure maintenance should be secured)?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent). We can allocate money for contingency funding, on the basis that a separate request for the money will need to be made alongside proof of the additional cost/ spend. Contingency costs must be noted.

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response)**

**Question 4- Panel Feedback**

**Is the project deliverable?**

Yes  Score 0-10 points \_\_\_\_\_ / No  0

\*a 0 score is an automatic disqualification n/a

**Has the bid considered alternative options?**

Yes  Score 0-10 points \_\_\_\_\_ / No  0

**Are there enough CIL funds available?**

Yes  Score 0-10 points \_\_\_\_\_ / No  0

\*a 0 score is an automatic disqualification

**Are there any costs which should not be included?** Yes  No

**If yes, specify-**

**Contingencies**

**£6,080.00**

**£3,000.00**

**£400.00**

**Costs are not actuals- and are subject to procurement. Agreement to fund would need to be conditional upon costing up to an agreed total.**

<p><b>Reasons:</b></p> <p>Panel noted project would be sponsored by GCC, which has an excellent track record of delivery, however, the delivery mechanism and relationship with private providers was not clear. Costing for the bid would need to be 'up to' with a draw down agreement, as there were no final costings.</p> <p>The panel also queries about how bays/ parking would be provisioned if the project grew and highlights that this would be potential delivery risk/ future work/ additional cost.</p>
<p><b>Question 4 total score:</b></p> <p>n/a</p>

<b>Summary Panel Feedback</b>		
<b>Has the bid been disqualified?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>Total score</b> _____		
<b>Recommendation for funding?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>Any costs to be removed?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>If yes, please specify-</b> <b>Contingency fees must be noted. They can be included as a separate total for a later draw-down.</b>		
<b>Total recommended for funding (if applicable)</b> _____		
<b>Overall feedback for bidder:</b>		
Whilst the panel could see merit in this bid, it has been excluded from funding from the strategic CIL fund at this time on the basis that it was not strategic in scale/ offer (in the absence of being an identified infrastructure scheme in strategic policy). If the bid had not been excluded, the panel would still have had additional concerns around funding the scheme for public benefit, responsibility and value of money which would need to be addressed before any further bid were made.		
The project timings for kick-start appeared drawn-out and unclear. The panel questions whether the sufficient collaboration on car parking bay provision has been pursued prior to bidding.		

# **Community Infrastructure Levy (CIL) Bid Panel**

## **Feedback Sheet**

### **Strategic Fund**

CIL is for investment in infrastructure which meets local needs. It must be spent in the public interest and the rules around spending it are strict.

Whilst each bidder has been made aware of these requirements and has been given the opportunity to amend their bids according to the scoring matrix and officer advice.

This checklist will be provided as feedback to any unsuccessful bidders, so please ensure you fill in the boxes.

<b>Bid Name</b>	<b>Fairford Town Grassroots Growth Project</b>
<b>Bidder</b>	<b>Fairford Town Football Club and Fairford Town Academy</b>
<b>Proposed infrastructure project</b>	<b>3G pitch, fencing, netting, floodlighting and access paths.</b>
<b>Amount of bid</b>	<b>£209,000.00</b>

#### **Question 1:**

**Is the project identified in policies SA1, SA2 or SA3 of the adopted Cotswold District Local Plan as an essential or critical project?**

**~Total possible score: 20**

#### **Panel Advice for Question 1:**

**This question addresses the STRATEGIC requirement.**

**The approach in these policies has moved on somewhat, so, if the project is not included in one of these policies but does refer to the overall aims and growth identified in the Local Plan, it may still attract a score of up to 10. Importantly, the project must have a STRATEGIC impact- so it must benefit a large number of residents or meet the needs of residents from more than one settlement.**

**The policies are:**

#### **Policy SA1 STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:

*Healthcare*

- Romney House Surgery, Tetbury - expansion or relocation; and
- New doctors' surgery in Cirencester.

*Flood management*

- SUDS and soft measure interventions to manage flood risk.

*Highways*

Junction improvements at:

- A429 / Cherrytree Lane, Cirencester;
- A417 (High Street) / A361 (Thames Street), Lechlade;
- A417 / Whelford Road, between Fairford and Lechlade;
- A429 / A433, between Cirencester and Kemble; and
- A433 (London Road / Long Street) / Hampton Street / New Church Street, Tetbury.

*Sport & Recreation*

- Re-use of the former Cirencester to Kemble and Tetbury to Kemble railway lines for cycling; and
- Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors

**Policy SA2 STRATEGIC DELIVERY - MID-COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the Mid-Cotswolds Sub-Area are:

Highways Improvement of Unicorn junction (A436/B4068), Stow-on-the-Wold

**Policy SA3 STRATEGIC DELIVERY - NORTH COTSWOLDS**

Within the context of Policy INF1, the strategic infrastructure requirements for the North Cotswolds Sub-Area are:

*Healthcare*

Expansion or replacement of doctors' surgery in Chipping Campden.

*Flood management*

Flood alleviation bund and channel to the north-west and south of Moreton-in-Marsh.

*Highways*

Improvements to A429 (Fosse Way),

Moreton-in-Marsh; Junction improvements at A429 (High Street)/A44 (Oxford Street),

Moreton-in-Marsh; and Junction improvements at A429 (High Street)/A44 (Bourton Road),

Moreton-in-Marsh.

*Education*

Expansion of Chipping Campden Secondary School.

**Question 1- Panel Feedback**

**Is the infrastructure project in policies SA1-3?**

**Yes  20 points / No**

**If answer is no-**

**Is the project strategic? Yes  capable of a score / No  0 points**

<p><b>*a 0 score is an automatic disqualification for failure to meet the strategic test</b></p>
<p><b>Does the bid refer to other planning policies which support the need for the scheme?</b></p> <p>Yes <input checked="" type="checkbox"/> 5 points / No <input type="checkbox"/> 0 points</p>
<p><b>Does the project respond to infrastructure needs identified in other evidence-based studies?</b></p> <p>Yes <input checked="" type="checkbox"/> 5 points / No <input type="checkbox"/> 0 points</p>
<p><b>Reasons:</b></p> <p>Policies SA1-SA3 are limited in their sports and recreation infrastructure requirements. However, there is clearly evidenced need for additional sports and recreation facilities in the District.</p> <p>The panel commends the bidders on a well evidenced bid, which refers to specific strategic policies and evidence-based documents, including the Playing Pitch Strategy. It is clear the bidders intend to engage with a range of sports providers and local community groups to meet as wide a range of needs as possible, including a community outreach which would extend well beyond Fairford itself.</p>
<p><b>Question 1 total score:</b></p> <p>10/ 20</p>

<p><b>Question 2:</b></p> <p><b>Is the project identified in the IFS as a CIL spending priority? If not, is there sufficient justification to fund a project that is not on the priority list?</b></p> <p><b>~Total possible score: 20</b></p>
<p><b>Panel Advice for Question 2:</b></p> <p><b>This question is outdated but remains in our matrix and needs to be answered.</b></p>
<p><b>The real aim of the question is the <b>LEGAL</b> requirement for CIL spending-</b></p>

***Regulation 59 of the Community Infrastructure Regulations 2010 (as amended) requires that CIL is spent to fund infrastructure which supports the development of its area.***

Our IFS list originated in 2016 (it's based on the Infrastructure Delivery Plan (IDP)). Back then, we identified infrastructure needed to support the housing and employment development in our Local Plan. It is a short list to increase road capacity to deal with the additional traffic from housing. In 2019, we declared a climate emergency and now prefer sustainable travel over private traffic/ road improvements. The list also doesn't address other non-transport related infrastructure needs for healthy and sustainable communities.

The last IFS acknowledged made an important caveat-  
"The Council's focus has changed towards sustainable transport and enabling the modal shift away from car use as the main form of transport. Infrastructure projects that alleviate the pressure on these junctions via sustainable means are therefore preferred over projects that directly increase highway capacity as currently listed".

It's therefore important that you understand that not being included on the IFS list should not preclude bids. However, bids MUST show that they address the infrastructure needs arising from growth. We've broken this question down to help you answer it.

#### **The IFS List-**

<b>Parish</b>	<b>Project</b>
<b>Kemble</b>	<b>Junction improvements at A429/ A433, between Cirencester and Kemble</b>
<b>Kemble</b>	<b>Re-use of the former railway line for cycling (successful bid 2024)</b>
<b>Lechlade</b>	<b>Junction improvements at A417/ Whelford Road between Fairford and Lechlade</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (Fosseway)</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Oxford Street)</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Bourton Road)</b>
<b>Stow-on-the-Wold</b>	<b>Improvement of Unicorn junction (A436/B4068)</b>
<b>Tetbury</b>	<b>Junction improvements at A433 (London Road/ Long Street) / Hampton Street/ New Church Street</b>
<b>South Cotswolds</b>	<b>SUDS and soft measure interventions to manage flood risk</b>

**To determine whether the project responds to growth, you should discuss-**

- Does it respond to increased population (or increased in demographic groups such as children, older people or disabled people) by increasing the capacity of quality of existing services, or providing new services?
- Has the bid identified where that growth has come from/ evidenced it?
  - Have they referred to particular development?
  - Have they referred to any infrastructure evidence studies?
- Has the bid identified *how* it will provide that service to our residents-
  - Will it be open and accessible to the public now and into the future? i.e. is it free or chargeable, if chargeable, where is the revenue going?  
**FYI- Private companies gaining profit are NOT providing infrastructure to the public and cannot be considered for bids.**
  - Does it explain how it will meet current and future needs?
  - What outreach/ advertising or other public engagement is planned?

**Question 2- Panel Feedback**

**Is the infrastructure project on the IFS list?**

**Yes  20 points / No  0 points**

**OR- If answer is no-**

**Is the project for sustainable transport, walking or cycling?**

**Yes  5 points / No  0 points**

**Does the project respond to growth?**

**Score 6 (0-10 points)**

**\*a 0 score is an automatic disqualification for failure to meet the legal test**

**Reasons:**

Although the sports facility proposed would be in Fairford, close to the boundary of the District, the panel is content that the infrastructure provided would reach a wide demographic both within and without the District. The panel considers the bid would be responding to pre-planned and speculative growth. The panel is pleased to see the bid referred to specific examples of growth and a robust evidence base of need.

The score allocated by the panel is reflective of the fact that there is a similar bid for a sports pitch facility at Farmor School in Faringdon, which would offer a larger facility. The panel considers that the alternative scheme could better meet the needs of growth in the District due to its increased offer. The panel nonetheless notes that the Playing pitch strategy identifies a 1.75 pitch undersupply across the District.

**Question 2 total score:**

**6/ 20**

**Question 3:**

**Have you secured match funding to increase potential outputs from the project?**

**~Total possible score: 20**

**Panel Advice for Question 3:**

**This question addresses the RESPONSIBILITY requirement.**

**Community Infrastructure Levy funds are to be used for the public benefit. It is important that we can demonstrate that the investment of public money in the project provides services people need and value for money. Match-funding is one element of this, but sometimes match funding is not available.**

**You should consider:**

**Is the cost of the scheme justified?** i.e. Is there proof of different quotes? does the cost appear reasonably proportionate? Has the bidder provided any due-diligence information/ enough financial information?

**Does the project offer value for money?** i.e. is the amount of CIL investment balanced with the urgency, importance and scale of the community's need? Has match-funding been explored as an option?

**Does the project secure infrastructure for people now and in the future?** i.e. how long will the project serve the public? Is that balanced with the amount of investment? Does the bidder control the land and/or infrastructure asset that will result from the investment so that we can be confident it will remain open to the public?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)

- **Contingency or 'just in case' additional** funds (we cannot provide public money which may not be spent).

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

### **Question 3- Panel Feedback**

**Has match-funding been secured?**

Yes  10 points / No  0 points

OR

**Has the bid examined all funding possibilities and robustly justified why these have not been pursued?**

Yes  5 points / No  0 points

**Is the cost of the scheme justified, and does it offer value for money?**

**Score 6 (0-10 points)**

**\*a 0 score is an automatic disqualification for failure to meet the responsibility test**

#### **Reasons:**

The panel is pleased to see that match funding had been explored in detail within the bid. The panel recognises that whilst match-funding was identified that it is not necessarily guaranteed without CIL funding.

The panel feels the bid offers a good cost-to-benefit for the use of public money. However, the panel questions whether the costing projections are realistic or too conservative. For example, the planning expert members of the panel felt the planning costs could be considerably greater for a scheme of this type than those identified due to noise, lighting and ecological survey requirements to support an application.

The panel shared the same comment in respect of another similar bid, although the alternative bid appeared slightly more robust in its costing overall. Understated costs increase the risk to overall project delivery, and so the score given is reflective of this.

Question 3 total score:

16 / 20

### **Question 4:**

**Is the project deliverable and what is the time frame? Have you considered alternative options to deliver the outcome of your project? Are enough CIL funds currently available?**

**~Total possible score: 30**

**Panel Advice for Question 3:**

**This group of questions address the ACCOUNTABILITY requirement. If we are investing public money in infrastructure projects, we have to be certain that the project can and will go ahead. This means understanding when and how the project will be delivered, who will be accountable and whether it is properly funded.**

**You should consider:**

**Is the project deliverable?** I.e. has the bidder provided a project plan? Are there clear roles and responsibilities? Is there a timescale involved? Does the bidder have a track record of delivering similar projects or can then point to similar feasible examples? Does the bid explain how the providers will report progress back to the Council?

**Has the bid considered alternative options?** Is the bid the best and most effective route for meeting the needs identified? This is particularly important where there are competing bids for similar infrastructure, or where the scheme seeks a large investment into infrastructure which is to meet future needs (are the needs known and is the extent of investment justified?). Aside from the match-funding question, is CIL the best route for this infrastructure- are there other responsible bodies who could provide this infrastructure?

**Are enough CIL funds currently available?**

**This can automatically exclude bids.** If there is sufficient funding, but the scheme seeks a large financial investment of CIL- does the bid phase the development so that CIL funding can be drawn down only when required? Does the bid provide for future revenue to maintain the infrastructure into the future (the greater the investment, the longer term the infrastructure maintenance should be secured)?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional** funds (we cannot provide public money which may not be spent). We can allocate money for contingency funding, on the basis that a separate request for the money will need to be

made alongside proof of the additional cost/ spend. Contingency costs must be noted.

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST be removed from the bids (please note this in the response).**

#### Question 4- Panel Feedback

**Is the project deliverable?**

**Yes  Score 4 (0-10 points) / No  0**

**\*a 0 score is an automatic disqualification**

**Has the bid considered alternative options?**

**Yes  Score 4 (0-10 points) / No  0**

**Are there enough CIL funds available?**

**Yes  Score 3 (0-10 points) / No  0**

**\*a 0 score is an automatic disqualification**

**Are there any costs which should not be included? Yes  No**

**If yes, specify-**

**Contingencies**

**£27,000.00**

**Costs are not actuals- and are subject to procurement. Agreement to fund would need to be conditional upon costing up to an agreed total.**

**Reasons:**

The project is reliant on several stages and is currently at concept stage. The panel therefore considers the scheme to be relatively high-risk in delivery. The panel notes an alternative bid for a similar sports facility in Faringdon had already engaged with the pre-application planning process, which gives greater confidence in the deliverability of that project in comparison to this. The other scheme also had more realistic costings, which reduces the risk to delivery. The panel acknowledges a plan for intended engagement but feels that the other scheme had already carried out extensive engagement.

There are enough CIL funds available for this bid in isolation, however, there are not enough funds for all bids this year. The panel considers that there is potential

for significant overlap between this bid and another bid (Farmor School). On balance, the panel prefers the other bid and is reluctant to approve both bids without establishing fully that each bid would meet the needs of growth in combination. As such, the panel has awarded a lower score for available funds.

**Question 4 total score:**

**11 / 30**

<b>Summary Panel Feedback</b>		
<b>Has the bid been disqualified?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>Total score</b> <u>43</u>		
<b>Recommendation for funding?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>Any costs to be removed?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>If yes, please specify-</b> <b>Contingency fees must be noted. They can be included as a separate total for a later draw-down.</b>		
<b>Total recommended for funding (if applicable)</b> <u>0</u>		
<b>Overall feedback for bidder:</b>  The panel commends the bidders for the work put into this bid. Panel members with expertise in leisure and local football communicated to the panel that Fairford Town Football Club is a well-known and well-organised club. The panel feels the Club and Academy have a compelling bid. Unfortunately, this year is a very competitive year for CIL bids and the panel must prioritise which bids to recommend for funding. Whilst the panel acknowledges there is value to having a pitch available during the day for wider demographics such as walking football groups, it is not convinced at this time that the bid has a sufficiently unique offer.  The panel feels an alternative bid has a greater strategic impact, which is accountable, responsible and further along with public engagement. As such, the panel regrettably does not recommend this bid for funding this year.  The panel would welcome a repeated bid next year (bidding period to commence circa May 2026) after the bidders have had the opportunity to work with the school to ensure the two schemes could co-exist to meet the needs of growth without redundant duplication of offer.		

# **Community Infrastructure Levy (CIL) Bid Panel**

## **Feedback Sheet**

### **Strategic Fund**

CIL is for investment in infrastructure which meets local needs. It must be spent in the public interest and the rules around spending it are strict.

Whilst each bidder has been made aware of these requirements and has been given the opportunity to amend their bids according to the scoring matrix and officer advice.

This checklist will be provided as feedback to any unsuccessful bidders, so please ensure you fill in the boxes.

<b>Bid Name</b>	<b>Moreton-in-Marsh Transport Hub</b>
<b>Bidder</b>	<b>Great Western Railway (GWR) and Moreton in Marsh Town Council</b>
<b>Proposed infrastructure project</b>	<b>Improvements to M-i-M railway station to create a transport hub</b>
<b>Amount of bid</b>	<b>£4,066,628.00 total (£3,257,037.00 single phase)</b>

#### **Question 1:**

**Is the project identified in policies SA1, SA2 or SA3 of the adopted Cotswold District Local Plan as an essential or critical project?**

**~Total possible score: 20**

#### **Panel Advice for Question 1:**

**This question addresses the STRATEGIC requirement.**

**The approach in these policies has moved on somewhat, so, if the project is not included in one of these policies but does refer to the overall aims and growth identified in the Local Plan, it may still attract a score of up to 10. Importantly, the project must have a STRATEGIC impact- so it must benefit a large number of residents or meet the needs of residents from more than one settlement.**

**The policies are:**

#### **Policy SA1 STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:

*Healthcare*

- Romney House Surgery, Tetbury - expansion or relocation; and
- New doctors' surgery in Cirencester.

*Flood management*

- SUDS and soft measure interventions to manage flood risk.

*Highways*

Junction improvements at:

- A429 / Cherrytree Lane, Cirencester;
- A417 (High Street) / A361 (Thames Street), Lechlade;
- A417 / Whelford Road, between Fairford and Lechlade;
- A429 / A433, between Cirencester and Kemble; and
- A433 (London Road / Long Street) / Hampton Street / New Church Street, Tetbury.

*Sport & Recreation*

- Re-use of the former Cirencester to Kemble and Tetbury to Kemble railway lines for cycling; and
- Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors

**Policy SA2 STRATEGIC DELIVERY - MID-COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the Mid-Cotswolds Sub-Area are:

Highways Improvement of Unicorn junction (A436/B4068), Stow-on-the-Wold

**Policy SA3 STRATEGIC DELIVERY - NORTH COTSWOLDS**

Within the context of Policy INF1, the strategic infrastructure requirements for the North Cotswolds Sub-Area are:

*Healthcare*

Expansion or replacement of doctors' surgery in Chipping Campden.

*Flood management*

Flood alleviation bund and channel to the north-west and south of Moreton-in-Marsh.

*Highways*

Improvements to A429 (Fosse Way),

Moreton-in-Marsh; Junction improvements at A429 (High Street)/A44 (Oxford Street),

Moreton-in-Marsh; and Junction improvements at A429 (High Street)/A44 (Bourton Road),

Moreton-in-Marsh.

*Education*

Expansion of Chipping Campden Secondary School.

**Question 1- Panel Feedback**

**Is the infrastructure project in policies SA1-3?**

**Yes  20 points / No**

**If answer is no-**

**Is the project strategic? Yes  capable of a score / No  0 points**

**\*a 0 score is an automatic disqualification for failure to meet the strategic test**

**Does the bid refer to other planning policies which support the need for the scheme?**

Yes  5 points / No  0 points

**Does the project respond to infrastructure needs identified in other evidence-based studies?**

Yes  5 points / No  0 points

**Reasons:**

*Policies SA1-3 do not make provision for rail improvements or transport hubs, however the improvements suggested in this bid could contribute towards the modal shift aspirations of both the Council and the County Council. The panel nonetheless feels the evidence submitted with the bid as to the extent of impact on modal shift arising from the hub is limited.*

*The panel acknowledges the bid to be strategic in scale and as such has chosen not to automatically exclude the bid. A score of 10 is automatic as a result. However, the panel has significant concerns around the strategic demand for this infrastructure, which is not evidenced in the bid as mentioned above.*

*The planning experts of the panel highlighted that the bid does not reflect the current strategic policies of the Local Plan, albeit it complies with them to the extent that planning permission is granted for the scheme. Although the bid is strategic in scale, the panel is concerned that making such a large investment in infrastructure prior to a clear spatial strategy under the emerging local plan could undermine the delivery of essential infrastructure necessary to deliver the emerging plan.*

*The panel notes correspondence both in support of the scheme as a strategic infrastructure project, and against; for the same reasons as discussed by the panel. Whilst the panel understands that there are often mixed views on development proposals, it considers that the mixed views in this case are reflective of the lack of current consensus or direction on future growth which will be provided via the emerging plan.*

**Question 1 total score:**

10 / 20

**Question 2:**

**Is the project identified in the IFS as a CIL spending priority? If not, is there sufficient justification to fund a project that is not on the priority list?**

**~Total possible score: 20**

**Panel Advice for Question 2:**

**This question is outdated but remains in our matrix and needs to be answered.**

**The real aim of the question is the **LEGAL** requirement for CIL spending- *Regulation 59 of the Community Infrastructure Regulations 2010 (as amended) requires that CIL is spent to fund infrastructure which supports the development of its area.***

Our IFS list originated in 2016 (it's based on the Infrastructure Delivery Plan (IDP)). Back then, we identified infrastructure needed to support the housing and employment development in our Local Plan. It is a short list to increase road capacity to deal with the additional traffic from housing. In 2019, we declared a climate emergency and now prefer sustainable travel over private traffic/ road improvements. The list also doesn't address other non-transport related infrastructure needs for healthy and sustainable communities.

The last IFS acknowledged made an important caveat-  
“The Council’s focus has changed towards sustainable transport and enabling the modal shift away from car use as the main form of transport. Infrastructure projects that alleviate the pressure on these junctions via sustainable means are therefore preferred over projects that directly increase highway capacity as currently listed”.

It's therefore important that you understand that not being included on the IFS list should not preclude bids. However, bids **MUST** show that they address the infrastructure needs arising from growth. We've broken this question down to help you answer it.

**The IFS List-**

Parish	Project
Kemble	<b>Junction improvements at A429/ A433, between Cirencester and Kemble</b>
Kemble	<b>Re-use of the former railway line for cycling (successful bid 2024)</b>

<b>Lechlade</b>	<b>Junction improvements at A417/ Whelford Road between Fairford and Lechlade</b>	
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (Fosseway)</b>	
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Oxford Street)</b>	
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Bourton Road)</b>	
<b>Stow-on-the-Wold</b>	<b>Improvement of Unicorn junction (A436/B4068)</b>	
<b>Tetbury</b>	<b>Junction improvements at A433 (London Road/ Long Street) / Hampton Street/ New Church Street</b>	
<b>South Cotswolds</b>	<b>SUDS and soft measure interventions to manage flood risk</b>	

**To determine whether the project responds to growth, you should discuss-**

- Does it respond to increased population (or increased in demographic groups such as children, older people or disabled people) by increasing the capacity of quality of existing services, or providing new services?
- Has the bid identified where that growth has come from/ evidenced it?
  - Have they referred to particular development?
  - Have they referred to any infrastructure evidence studies?
- Has the bid identified *how* it will provide that service to our residents-
  - Will it be open and accessible to the public now and into the future? i.e. is it free or chargeable, if chargeable, where is the revenue going?  
**FYI- Private companies gaining profit are NOT providing infrastructure to the public and cannot be considered for bids.**
  - Does it explain how it will meet current and future needs?
  - What outreach/ advertising or other public engagement is planned?

#### Question 2- Panel Feedback

**Is the infrastructure project on the IFS list?**

**Yes  20 points / No  0 points**

**OR- If answer is no-**

**Is the project for sustainable transport, walking or cycling?**

**Yes  5 points / No  0 points**

**Does the project respond to growth?**

**Score 2 (0-10 points)**

**\*a 0 score is an automatic disqualification for failure to meet the legal test**

**Reasons:**

As outlined above, the panel is concerned that the project does not respond to known or anticipated growth, which has yet to be defined through the plan-led process. The panel also query why the bid is not supported with detailed transport modelling. An interchange hub will, to some extent, respond to existing population and will encourage use of sustainable transport facilities. The planning expert members of the panel also highlighted that the scheme now benefits from planning permission. The panel opts to give a score in recognition of that, rather than automatically exclude the scheme.

**Question 2 total score:**

**7/ 20**

**Question 3:**

**Have you secured match funding to increase potential outputs from the project?**

**~Total possible score: 20**

**Panel Advice for Question 3:**

**This question addresses the RESPONSIBILITY requirement.**  
**Community Infrastructure Levy funds are to be used for the public benefit. It is important that we can demonstrate that the investment of public money in the project provides services people need and value for money. Match-funding is one element of this, but sometimes match funding is not available.**

**You should consider:**

**Is the cost of the scheme justified?** i.e. Is there proof of different quotes? does the cost appear reasonably proportionate? Has the bidder provided any due-diligence information/ enough financial information?

**Does the project offer value for money?** i.e. is the amount of CIL investment balanced with the urgency, importance and scale of the community's need? Has match-funding been explored as an option?

**Does the project secure infrastructure for people now and in the future?** i.e. how long will the project serve the public? Is that balanced with the amount of investment? Does the bidder control the land and/or infrastructure asset that will

result from the investment so that we can be confident it will remain open to the public?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent).

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

**Question 3- Panel Feedback**

**Has match-funding been secured?**

Yes  10 points / No  0 points

OR

**Has the bid examined all funding possibilities and robustly justified why these have not been pursued?**

Yes  5 points / No  0 points

**Is the cost of the scheme justified, and does it offer value for money?**

**Score 2 (0-10 points)**

**\*a 0 score is an automatic disqualification for failure to meet the responsibility test**

**Reasons:**

The panel is not satisfied that sufficient information has been submitted with the bid to break down the costs, justify them, nor explain the funding model for the scheme in the future. The panel is disappointed to see that no match funding from relevant stakeholders has been explored or secured, other than the existing spends made to secure planning permission.

The panel understands that the bidders were advised to phase the cost of £4,066,628.00 and the bidders have responded. The bid now seeks £3,257,037.00 for this year, with the remainder (or other total) to be sought next year. Whilst the scheme is a moderate undertaking of work, the panel does not feel that the costs have been justified, particularly the significant increase in cost (double) to the previous bid for the same work. The panel considers the cost is also disproportionate to the benefit/ growth that the scheme purports to respond to at this time.

The panel is also concerned that the funding would represent a significant proportion of the total CIL receipts collected by the council since the introduction of a CIL charge and expects that a higher threshold of justification is provided.

The panel is not convinced that the benefits of the scheme are proportionate to the cost. That being said, the panel does wish to feedback that a bid demonstrating an understanding car parking demand in Moreton in Marsh would have garnered more support/ weight, particularly if it had addressed parking, interconnectivity, EVC use and settlement networks via public transport.

The carparking experts of the panel highlight that the carpark is currently run by APCOA on behalf of GWR and the resulting revenue go to APCOA with a proportion paid back to GWR. The panel is concerned that the increased revenue arising from the carparking improvements would be passed to a private company (which would not be an appropriate following CIL investment) and that no match-funding from other stakeholders is being explored or secured. Similarly, the panel considers that the revenue may also be passed back to the Department of Transport or GWR, again with those stakeholders offering no match-funding. The future revenue off-set of the cost was not evidenced to the panel.

The panel also points out that the bid includes a unit which would be made available to a small business- again the panel has concerns that there is no provision for those profits to be put back into investment in the public realm.

Question 3 total score:

**2/ 20**

#### **Question 4:**

**Is the project deliverable and what is the time frame? Have you considered alternative options to deliver the outcome of your project? Are enough CIL funds currently available?**

**~Total possible score: 30**

**Panel Advice for Question 3:**

**This group of questions address the ACCOUNTABILITY requirement.**

**If we are investing public money in infrastructure projects, we have to be certain that the project can and will go ahead. This means understanding when and how the project will be delivered, who will be accountable and whether it is properly funded.**

**You should consider:**

**Is the project deliverable?** I.e. has the bidder provided a project plan? Are there clear roles and responsibilities? Is there a timescale involved? Does the bidder have a track record of delivering similar projects or can then point to similar feasible examples? Does the bid explain how the providers will report progress back to the Council?

**Has the bid considered alternative options?** Is the bid the best and most effective route for meeting the needs identified? This is particularly important where there are competing bids for similar infrastructure, or where the scheme seeks a large investment into infrastructure which is to meet future needs (are the needs known and is the extent of investment justified?). Aside from the match-funding question, is CIL the best route for this infrastructure- are there other responsible bodies who could provide this infrastructure?

**Are enough CIL funds currently available?**

**This can automatically exclude bids.** If there is sufficient funding, but the scheme seeks a large financial investment of CIL- does the bid phase the development so that CIL funding can be drawn down only when required? Does the bid provide for future revenue to maintain the infrastructure into the future (the greater the investment, the longer term the infrastructure maintenance should be secured)?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent). We can allocate money for contingency funding, on the basis that a separate request for the money will need to be made alongside proof of the additional cost/ spend. Contingency costs must be noted.

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

#### **Question 4- Panel Feedback**

**Is the project deliverable?**

**Yes  Score 7 (0-10 points) / No  0**

**\*a 0 score is an automatic disqualification**

**Has the bid considered alternative options?**

**Yes  Score 0-10 points \_\_\_\_\_ / No  0**

**Are there enough CIL funds available?**

**Yes  Score 0-10 points \_\_\_\_\_ / No  0**

**\*a 0 score is an automatic disqualification**

**Are there any costs which should not be included? Yes  No**

**If yes, specify-**

**Contingencies and officer time. See Annex A of bid.**

**Costs are not actuals- and are subject to procurement. Agreement to fund would need to be conditional upon costing up to an agreed total.**

**Reasons:**

The panel has regard to GWR's proven track record of delivering such schemes and considers a 20% contingency is reasonable (subject to the CIL contingency approach). The panel does consider that such a high-cost scheme is naturally high-risk, so the score reflects this.

The panel is not satisfied that the costs have been justified nor that the scheme represents value for money. The increase in cost over the course of a year is a serious basis for such views in the panel. The panel believes that there is potential for better value options for achieving similar benefits, which the bid does not address.

There are not sufficient CIL funds for all projects this year. This bid represents the lion's share of not only this year's bids, but the entire total of CIL receipts since CIL became chargeable. The panel is concerned that the scheme is wholly reliant on CIL and phasing to secure additional funding next year, and there is no guarantee that such funding would be available (CIL receipts are not guaranteed). The panel believes this could result in an unviable scheme, and the bid has done little to address this risk.

<b>Question 4 total score:</b> <b>7/ 30</b>
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<b>Summary Panel Feedback</b>		
<b>Has the bid been disqualified?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>Total score</b> <u>26</u>		
<b>Recommendation for funding?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>Any costs to be removed?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>If yes, please specify-</b> <b>Contingency fees must be noted. They can be included as a separate total for a later draw-down.</b>		
<b>Total recommended for funding (if applicable)</b> <u>0</u>		
<b>Overall feedback for bidder:</b>  The panel recognises the potential benefits of the scheme and strongly supports schemes for sustainable transport in the district. However, concerns around cost-benefit, cost-justification, lack of match funding and predominantly, not responding to anticipated growth (which has yet to be defined), override these benefits. Regrettably, the panel recommends that funding is not provided this year.		

# **Community Infrastructure Levy (CIL) Bid Panel Feedback Sheet**

## **Strategic Fund**

CIL is for investment in infrastructure which meets local needs. It must be spent in the public interest and the rules around spending it are strict.

Whilst each bidder has been made aware of these requirements and has been given the opportunity to amend their bids according to the scoring matrix and officer advice.

This checklist will be provided as feedback to any unsuccessful bidders, so please ensure you fill in the boxes.

<b>Bid Name</b>	<b>Community All-Weather Multipurpose Sports Pitch</b>
<b>Bidder</b>	<b>Farmor's School, Fairford</b>
<b>Proposed infrastructure project</b>	<b>All weather sports pitch</b>
<b>Amount of bid</b>	<b>£723,006.00</b>

### **Question 1:**

**Is the project identified in policies SA1, SA2 or SA3 of the adopted Cotswold District Local Plan as an essential or critical project?**

**~Total possible score: 20**

### **Panel Advice for Question 1:**

**This question addresses the STRATEGIC requirement.**

**The approach in these policies has moved on somewhat, so, if the project is not included in one of these policies but does refer to the overall aims and growth identified in the Local Plan, it may still attract a score of up to 10. Importantly, the project must have a STRATEGIC impact- so it must benefit a large number of residents or meet the needs of residents from more than one settlement.**

### **The policies are:**

#### **Policy SA1 STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:

##### **Healthcare**

- Romney House Surgery, Tetbury - expansion or relocation; and
- New doctors' surgery in Cirencester.

*Flood management*

- SUDS and soft measure interventions to manage flood risk.

*Highways*

Junction improvements at:

- A429 / Cherrytree Lane, Cirencester;
- A417 (High Street) / A361 (Thames Street), Lechlade;
- A417 / Whelford Road, between Fairford and Lechlade;
- A429 / A433, between Cirencester and Kemble; and
- A433 (London Road / Long Street) / Hampton Street / New Church Street, Tetbury.

*Sport & Recreation*

- Re-use of the former Cirencester to Kemble and Tetbury to Kemble railway lines for cycling; and
- Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors

**Policy SA2 STRATEGIC DELIVERY - MID-COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the Mid-Cotswolds Sub-Area are:

Highways Improvement of Unicorn junction (A436/B4068), Stow-on-the-Wold

**Policy SA3 STRATEGIC DELIVERY - NORTH COTSWOLDS**

Within the context of Policy INF1, the strategic infrastructure requirements for the North Cotswolds Sub-Area are:

*Healthcare*

Expansion or replacement of doctors' surgery in Chipping Campden.

*Flood management*

Flood alleviation bund and channel to the north-west and south of Moreton-in-Marsh.

*Highways*

Improvements to A429 (Fosse Way),

Moreton-in-Marsh; Junction improvements at A429 (High Street)/A44 (Oxford Street),

Moreton-in-Marsh; and Junction improvements at A429 (High Street)/A44 (Bourton Road),

Moreton-in-Marsh.

*Education*

Expansion of Chipping Campden Secondary School.

**Question 1- Panel Feedback**

**Is the infrastructure project in policies SA1-3?**

**Yes  20 points / No**

**If answer is no-**

**Is the project strategic? Yes  capable of a score / No  0 points**

**\*a 0 score is an automatic disqualification for failure to meet the strategic test**

**Does the bid refer to other planning policies which support the need for the scheme?**

Yes  5 points / No  0 points

**Does the project respond to infrastructure needs identified in other evidence-based studies?**

Yes  5 points / No  0 points

**Reasons:**

Policies SA1-SA3 are limited in their sports and recreation infrastructure requirements. However, there is clearly evidenced need for additional sports and recreation facilities in the District.

The panel commends the bidders on a well evidenced bid, which refers to specific strategic policies and evidence-based documents, including the Playing Pitch Strategy. It is clear the bidders have engaged with a range of sports providers and local community groups to meet as wide a range of needs as possible, including a community outreach which would extend well beyond Fairford itself.

**Question 1 total score:**

10 / 20

**Question 2:**

**Is the project identified in the IFS as a CIL spending priority? If not, is there sufficient justification to fund a project that is not on the priority list?**

**~Total possible score: 20**

**Panel Advice for Question 2:**

**This question is outdated but remains in our matrix and needs to be answered.**

**The real aim of the question is the LEGAL requirement for CIL spending- *Regulation 59 of the Community Infrastructure Regulations 2010 (as amended) requires that CIL is spent to fund infrastructure which supports the development of its area.***

Our IFS list originated in 2016 (it's based on the Infrastructure Delivery Plan (IDP)). Back then, we identified infrastructure needed to support the housing and

employment development in our Local Plan. It is a short list to increase road capacity to deal with the additional traffic from housing. In 2019, we declared a climate emergency and now prefer sustainable travel over private traffic/ road improvements. The list also doesn't address other non-transport related infrastructure needs for healthy and sustainable communities.

The last IFS acknowledged made an important caveat-  
“The Council’s focus has changed towards sustainable transport and enabling the modal shift away from car use as the main form of transport. Infrastructure projects that alleviate the pressure on these junctions via sustainable means are therefore preferred over projects that directly increase highway capacity as currently listed”.

It's therefore important that you understand that not being included on the IFS list should not preclude bids. However, bids MUST show that they address the infrastructure needs arising from growth. We've broken this question down to help you answer it.

#### **The IFS List-**

<b>Parish</b>	<b>Project</b>
<b>Kemble</b>	<b>Junction improvements at A429/ A433, between Cirencester and Kemble</b>
<b>Kemble</b>	<b>Re-use of the former railway line for cycling (successful bid 2024)</b>
<b>Lechlade</b>	<b>Junction improvements at A417/ Whelford Road between Fairford and Lechlade</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (Fosseway)</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Oxford Street)</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Bourton Road)</b>
<b>Stow-on-the-Wold</b>	<b>Improvement of Unicorn junction (A436/B4068)</b>
<b>Tetbury</b>	<b>Junction improvements at A433 (London Road/ Long Street) / Hampton Street/ New Church Street</b>
<b>South Cotswolds</b>	<b>SUDS and soft measure interventions to manage flood risk</b>

#### **To determine whether the project responds to growth, you should discuss-**

- Does it respond to increased population (or increased in demographic groups such as children, older people or disabled people) by increasing the capacity of quality of existing services, or providing new services?

- Has the bid identified where that growth has come from/ evidenced it?
  - Have they referred to particular development?
  - Have they referred to any infrastructure evidence studies?
- Has the bid identified *how* it will provide that service to our residents-
  - Will it be open and accessible to the public now and into the future? i.e. is it free or chargeable, if chargeable, where is the revenue going?  
**FYI- Private companies gaining profit are NOT providing infrastructure to the public and cannot be considered for bids.**
  - Does it explain how it will meet current and future needs?
  - What outreach/ advertising or other public engagement is planned?

## Question 2- Panel Feedback

**Is the infrastructure project on the IFS list?**

**Yes  20 points / No  0 points**

**OR- If answer is no-**

**Is the project for sustainable transport, walking or cycling?**

**Yes  5 points / No  0 points**

**Does the project respond to growth?**

**Score 7 (0-10 points)**

**\*a 0 score is an automatic disqualification for failure to meet the legal test**

### **Reasons:**

Although the sports facility proposed would be in Fairford, close to the boundary of the District, the panel is content that the infrastructure provided would reach a wide demographic both within and without the District. The panel considers the bid would be responding to pre-planned and speculative growth. The panel is pleased to see the bid referred to specific examples of growth and a robust evidence base of need.

The score allocated by the panel is reflective of the fact that there is a similar bid for a sports pitch facility by Fairford Town Football Club in Faringdon, which would offer a smaller facility. The panel considers that the Farmor School scheme could better meet the needs of growth in the District due to its increased offer, albeit it notes that the school facility would likely have limited general access during school hours. The panel nonetheless notes that the Playing pitch strategy identifies a 1.75 pitch undersupply across the District.

**Question 2 total score:**

**7 / 20**

**Question 3:**

**Have you secured match funding to increase potential outputs from the project?**

**~Total possible score: 20**

**Panel Advice for Question 3:**

**This question addresses the RESPONSIBILITY requirement.**

**Community Infrastructure Levy funds are to be used for the public benefit. It is important that we can demonstrate that the investment of public money in the project provides services people need and value for money. Match-funding is one element of this, but sometimes match funding is not available.**

**You should consider:**

**Is the cost of the scheme justified?** i.e. Is there proof of different quotes? does the cost appear reasonably proportionate? Has the bidder provided any due-diligence information/ enough financial information?

**Does the project offer value for money?** i.e. is the amount of CIL investment balanced with the urgency, importance and scale of the community's need? Has match-funding been explored as an option?

**Does the project secure infrastructure for people now and in the future?** i.e. how long will the project serve the public? Is that balanced with the amount of investment? Does the bidder control the land and/or infrastructure asset that will result from the investment so that we can be confident it will remain open to the public?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent).

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST be removed from the bids (please note this in the response).**

**Question 3- Panel Feedback**

**Has match-funding been secured?**

Yes  10 points / No  0 points

**OR**

**Has the bid examined all funding possibilities and robustly justified why these have not been pursued?**

Yes  5 points / No  0 points

**Is the cost of the scheme justified, and does it offer value for money?**

**Score 7 (0-10 points)**

**\*a 0 score is an automatic disqualification for failure to meet the responsibility test**

**Reasons:**

The panel considers the scheme offers good value for money based on longevity, revenue for maintenance, and wide offer.

The panel questioned whether the costing projections were realistic or too conservative; for example, the planning expert members of the panel felt the planning costs could be greater for a scheme of this type than those identified noise, lighting and ecological survey requirements to support an application. However, the panel considers the costing for this scheme to be more realistic.

Question 3 total score:

17 / 20

**Question 4:**

**Is the project deliverable and what is the time frame? Have you considered alternative options to deliver the outcome of your project? Are enough CIL funds currently available?**

**~Total possible score: 30**

**Panel Advice for Question 3:**

**This group of questions address the ACCOUNTABILITY requirement.**

**If we are investing public money in infrastructure projects, we have to be certain that the project can and will go ahead. This means understanding when and how the project will be delivered, who will be accountable and whether it is properly funded.**

**You should consider:**

**Is the project deliverable?** I.e. has the bidder provided a project plan? Are there clear roles and responsibilities? Is there a timescale involved? Does the bidder have a track record of delivering similar projects or can then point to similar feasible examples? Does the bid explain how the providers will report progress back to the Council?

**Has the bid considered alternative options?** Is the bid the best and most effective route for meeting the needs identified? This is particularly important where there are competing bids for similar infrastructure, or where the scheme seeks a large investment into infrastructure which is to meet future needs (are the needs known and is the extent of investment justified?). Aside from the match-funding question, is CIL the best route for this infrastructure- are there other responsible bodies who could provide this infrastructure?

**Are enough CIL funds currently available?**

**This can automatically exclude bids.** If there is sufficient funding, but the scheme seeks a large financial investment of CIL- does the bid phase the development so that CIL funding can be drawn down only when required? Does the bid provide for future revenue to maintain the infrastructure into the future (the greater the investment, the longer term the infrastructure maintenance should be secured)?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent). We can allocate money for contingency funding, on the basis that a separate request for the money will need to be made alongside proof of the additional cost/ spend. Contingency costs must be noted.

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

#### **Question 4- Panel Feedback**

**Is the project deliverable?**

**Yes  Score 5 (0-10 points) / No  0**

**\*a 0 score is an automatic disqualification**

**Has the bid considered alternative options?**

**Yes  Score 4 (0-10 points) / No  0**

**Are there enough CIL funds available?**

**Yes  Score 4 (0-10 points) / No  0**

**\*a 0 score is an automatic disqualification**

**Are there any costs which should not be included? Yes  No**

**If yes, specify-**

**Contingency- proportion against whole cost, amount to be calculated.**

**Reasons:**

The planning expert members of the panel noted that the school had already engaged with the pre-application planning process and had already carried out extensive engagement. Panel members also noted that there had previously been leisure facilities at Farmor School and felt that the school has a good track record of providing such facilities.

The project is reliant on several stages and is currently at concept stage. The panel therefore considers the scheme to be relatively high-risk in delivery. The panel notes that the bidders have already engaged with the pre-application planning process, which gives greater confidence in the deliverability of this project in comparison to the other Faringdon sports bid. This scheme also has more realistic costings, which reduces the risk to delivery. The panel acknowledges the bidders have already carried out extensive engagement.

There are enough CIL funds available for this bid in isolation, however, there are not enough funds for all bids this year. The panel considers that there is potential for significant overlap between this bid and another bid (the Football Club). On balance, the panel prefers this bid. The panel is reluctant to approve both bids without establishing fully that each bid would meet the needs of growth in combination. As such, the panel has awarded a score for available funds based on this.

The panel appreciates the effort that the bidder has put into securing match funding. The panel notes that the scheme has a reliance on match funding which may not be guaranteed without CIL funding or other requirements being met, which increases the risk to delivery.

**Question 4 total score:**

13 / 30

<b>Summary Panel Feedback</b>		
<b>Has the bid been disqualified?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>Total score</b> <u>47</u>		
<b>Recommendation for funding?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>Any costs to be removed?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>If yes, please specify-</b> <b>Contingency fees must be noted. They can be included as a separate total for a later draw-down.</b> <b>Caveats re phasing.</b>		
<b>Total recommended for funding (if applicable)</b> _____		
<b>Overall feedback for bidder:</b> The panel wishes to thank the bidder for submitting such a complete, well evidenced and compelling bid. The panel is pleased to be able to recommend the scheme for CIL funding.  This recommendation is made subject to the submission of a full project plan and regular reporting (per standard legal agreements). Given the reliance on match funding, the panel would like to phase the funding to protect viability- so the Council would work with the bidder to break down the funding draw-down to mitigate the risk of loss of public monies.  The panel would recommend that the School, as the successful bidder, engages with the Football Club and Academy ahead of the next bidding term to consider whether it could incorporate the football club's needs or establish a collaborative approach if the Club chooses to re-bid.		

# Community Infrastructure Levy (CIL) Bid Panel Feedback Sheet

## Strategic Fund

CIL is for investment in infrastructure which meets local needs. It must be spent in the public interest and the rules around spending it are strict.

Whilst each bidder has been made aware of these requirements and has been given the opportunity to amend their bids according to the scoring matrix and officer advice.

This checklist will be provided as feedback to any unsuccessful bidders, so please ensure you fill in the boxes.

<b>Bid Name</b>	<b>The Redesdale Hall Phase 2</b>
<b>Bidder</b>	<b>The Redesdale Hall Trust, Moreton-in-Marsh</b>
<b>Proposed infrastructure project</b>	<b>Hall improvements and repairs</b>
<b>Amount of bid</b>	<b>£200,000.00</b>

### Question 1:

**Is the project identified in policies SA1, SA2 or SA3 of the adopted Cotswold District Local Plan as an essential or critical project?**

**~Total possible score: 20**

### Panel Advice for Question 1:

**This question addresses the STRATEGIC requirement.**

**The approach in these policies has moved on somewhat, so, if the project is not included in one of these policies but does refer to the overall aims and growth identified in the Local Plan, it may still attract a score of up to 10. Importantly, the project must have a STRATEGIC impact- so it must benefit a large number of residents or meet the needs of residents from more than one settlement.**

### **The policies are:**

#### **Policy SA1 STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:

##### *Healthcare*

- Romney House Surgery, Tetbury - expansion or relocation; and
- New doctors' surgery in Cirencester.

*Flood management*

- SUDS and soft measure interventions to manage flood risk.

*Highways*

Junction improvements at:

- A429 / Cherrytree Lane, Cirencester;
- A417 (High Street) / A361 (Thames Street), Lechlade;
- A417 / Whelford Road, between Fairford and Lechlade;
- A429 / A433, between Cirencester and Kemble; and
- A433 (London Road / Long Street) / Hampton Street / New Church Street, Tetbury.

*Sport & Recreation*

- Re-use of the former Cirencester to Kemble and Tetbury to Kemble railway lines for cycling; and
- Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors

**Policy SA2 STRATEGIC DELIVERY - MID-COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the Mid-Cotswolds Sub-Area are:

Highways Improvement of Unicorn junction (A436/B4068), Stow-on-the-Wold

**Policy SA3 STRATEGIC DELIVERY - NORTH COTSWOLDS**

Within the context of Policy INF1, the strategic infrastructure requirements for the North Cotswolds Sub-Area are:

*Healthcare*

Expansion or replacement of doctors' surgery in Chipping Campden.

*Flood management*

Flood alleviation bund and channel to the north-west and south of Moreton-in-Marsh.

*Highways*

Improvements to A429 (Fosse Way),

Moreton-in-Marsh; Junction improvements at A429 (High Street)/A44 (Oxford Street),

Moreton-in-Marsh; and Junction improvements at A429 (High Street)/A44 (Bourton Road),

Moreton-in-Marsh.

*Education*

Expansion of Chipping Campden Secondary School.

**Question 1- Panel Feedback**

**Is the infrastructure project in policies SA1-3?**

**Yes  20 points / No**

**If answer is no-**

**Is the project strategic? Yes  capable of a score / No  0 points**

**\*a 0 score is an automatic disqualification for failure to meet the strategic test**

**Does the bid refer to other planning policies which support the need for the scheme?**

Yes  5 points / No  0 points

**Does the project respond to infrastructure needs identified in other evidence-based studies?**

Yes  5 points / No  0 points

**Reasons:**

NOTE- scale of investment vs emerging and existing LP.

**Question 1 total score:**

/ 20

**Question 2:**

**Is the project identified in the IFS as a CIL spending priority? If not, is there sufficient justification to fund a project that is not on the priority list?**

**~Total possible score: 20**

**Panel Advice for Question 2:**

**This question is outdated but remains in our matrix and needs to be answered.**

**The real aim of the question is the LEGAL requirement for CIL spending- *Regulation 59 of the Community Infrastructure Regulations 2010 (as amended) requires that CIL is spent to fund infrastructure which supports the development of its area.***

Our IFS list originated in 2016 (it's based on the Infrastructure Delivery Plan (IDP)). Back then, we identified infrastructure needed to support the housing and employment development in our Local Plan. It is a short list to increase road capacity to deal with the additional traffic from housing. In 2019, we declared a climate emergency and now prefer sustainable travel over private traffic/ road improvements. The list also doesn't address other non-transport related infrastructure needs for healthy and sustainable communities.

The last IFS acknowledged made an important caveat-  
"The Council's focus has changed towards sustainable transport and enabling the modal shift away from car use as the main form of transport. Infrastructure projects that alleviate the pressure on these junctions via sustainable means are therefore preferred over projects that directly increase highway capacity as currently listed".

It's therefore important that you understand that not being included on the IFS list should not preclude bids. However, bids MUST show that they address the infrastructure needs arising from growth. We've broken this question down to help you answer it.

#### **The IFS List-**

<b>Parish</b>	<b>Project</b>
<b>Kemble</b>	<b>Junction improvements at A429/ A433, between Cirencester and Kemble</b>
<b>Kemble</b>	<b>Re-use of the former railway line for cycling (successful bid 2024)</b>
<b>Lechlade</b>	<b>Junction improvements at A417/ Whelford Road between Fairford and Lechlade</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (Fosseway)</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Oxford Street)</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Bourton Road)</b>
<b>Stow-on-the-Wold</b>	<b>Improvement of Unicorn junction (A436/B4068)</b>
<b>Tetbury</b>	<b>Junction improvements at A433 (London Road/ Long Street) / Hampton Street/ New Church Street</b>
<b>South Cotswolds</b>	<b>SUDS and soft measure interventions to manage flood risk</b>

**To determine whether the project responds to growth, you should discuss-**

- Does it respond to increased population (or increased in demographic groups such as children, older people or disabled people) by increasing the capacity of quality of existing services, or providing new services?
- Has the bid identified where that growth has come from/ evidenced it?
  - Have they referred to particular development?
  - Have they referred to any infrastructure evidence studies?
- Has the bid identified *how* it will provide that service to our residents-
  - Will it be open and accessible to the public now and into the future? i.e. is it free or chargeable, if chargeable, where is the revenue going?  
**FYI- Private companies gaining profit are NOT providing infrastructure to the public and cannot be considered for bids.**
  - Does it explain how it will meet current and future needs?
  - What outreach/ advertising or other public engagement is planned?

## Question 2- Panel Feedback

**Is the infrastructure project on the IFS list?**

**Yes  20 points / No  0 points**

**OR- If answer is no-**

**Is the project for sustainable transport, walking or cycling?**

**Yes  5 points / No  0 points**

**Does the project respond to growth?**

**Score 0-10 points \_\_\_\_\_**

**\*a 0 score is an automatic disqualification for failure to meet the legal test**

**Reasons:**

<b>Question 2 total score:</b> / 20
--

### Question 3:

**Have you secured match funding to increase potential outputs from the project?**

**~Total possible score: 20**

#### **Panel Advice for Question 3:**

**This question addresses the RESPONSIBILITY requirement.**  
**Community Infrastructure Levy funds are to be used for the public benefit. It is important that we can demonstrate that the investment of public money in the project provides services people need and value for money. Match-funding is one element of this, but sometimes match funding is not available.**

**You should consider:**

**Is the cost of the scheme justified?** i.e. Is there proof of different quotes? does the cost appear reasonably proportionate? Has the bidder provided any due-diligence information/ enough financial information?

**Does the project offer value for money?** i.e. is the amount of CIL investment balanced with the urgency, importance and scale of the community's need? Has match-funding been explored as an option?

**Does the project secure infrastructure for people now and in the future?** i.e. how long will the project serve the public? Is that balanced with the amount of investment? Does the bidder control the land and/or infrastructure asset that will result from the investment so that we can be confident it will remain open to the public?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent).

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

**Question 3- Panel Feedback**

**Has match-funding been secured?**

Yes  10 points / No  0 points

OR

**Has the bid examined all funding possibilities and robustly justified why these have not been pursued?**

Yes  5 points / No  0 points

**Is the cost of the scheme justified, and does it offer value for money?**

Score 0-10 points \_\_\_\_\_

**\*a 0 score is an automatic disqualification for failure to meet the responsibility test**

**Reasons:**

Question 3 total score:  
/ 20

**Question 4:**

**Is the project deliverable and what is the time frame? Have you considered alternative options to deliver the outcome of your project? Are enough CIL funds currently available?**

**~Total possible score: 30**

**Panel Advice for Question 3:**

**This group of questions address the ACCOUNTABILITY requirement.**

**If we are investing public money in infrastructure projects, we have to be certain that the project can and will go ahead. This means understanding when and how the project will be delivered, who will be accountable and whether it is properly funded.**

**You should consider:**

**Is the project deliverable?** I.e. has the bidder provided a project plan? Are there clear roles and responsibilities? Is there a timescale involved? Does the bidder have a track record of delivering similar projects or can then point to similar feasible examples? Does the bid explain how the providers will report progress back to the Council?

**Has the bid considered alternative options?** Is the bid the best and most effective route for meeting the needs identified? This is particularly important where there are competing bids for similar infrastructure, or where the scheme seeks a large investment into infrastructure which is to meet future needs (are the needs known and is the extent of investment justified?). Aside from the match-funding question, is CIL the best route for this infrastructure- are there other responsible bodies who could provide this infrastructure?

**Are enough CIL funds currently available?**

**This can automatically exclude bids.** If there is sufficient funding, but the scheme seeks a large financial investment of CIL- does the bid phase the development so that CIL funding can be drawn down only when required? Does the bid provide for future revenue to maintain the infrastructure into the future (the greater the investment, the longer term the infrastructure maintenance should be secured)?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent). We can allocate money for contingency funding, on the basis that a separate request for the money will need to be made alongside proof of the additional cost/ spend. Contingency costs must be noted.

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

#### **Question 4- Panel Feedback**

**Is the project deliverable?**

Yes  Score 0-10 points \_\_\_\_\_ / No  0

\*a 0 score is an automatic disqualification

**Has the bid considered alternative options?**

Yes  Score 0-10 points \_\_\_\_\_ / No  0

**Are there enough CIL funds available?**

Yes  Score 0-10 points \_\_\_\_\_ / No  0

\*a 0 score is an automatic disqualification

**Are there any costs which should not be included?** Yes  No

**If yes, specify-**

**Contingency- proportion against whole cost, amount to be calculated.**

**Reasons:**

**Question 4 total score:**

/ 30

**Summary Panel Feedback**

**Has the bid been disqualified?** Yes  No

**Total score** \_\_\_\_\_

**Recommendation for funding?** Yes  No

**Any costs to be removed?** Yes  No

**If yes, please specify-**

**Contingency fees must be noted. They can be included as a separate total for a later draw-down.**

**Total recommended for funding (if applicable)** \_\_\_\_\_

**Overall feedback for bidder:**

# Community Infrastructure Levy (CIL) Bid Panel Feedback Sheet

## Strategic Fund

CIL is for investment in infrastructure which meets local needs. It must be spent in the public interest and the rules around spending it are strict.

Whilst each bidder has been made aware of these requirements and has been given the opportunity to amend their bids according to the scoring matrix and officer advice.

This checklist will be provided as feedback to any unsuccessful bidders, so please ensure you fill in the boxes.

<b>Bid Name</b>	<b>Weston Sub-Edge Village Hall Sole Community Car Park</b>
<b>Bidder</b>	<b>Weston Sub-Edge Village Hall Charity</b>
<b>Proposed infrastructure project</b>	<b>Car park repairs</b>
<b>Amount of bid</b>	<b>£20,000.00</b>

### Question 1:

**Is the project identified in policies SA1, SA2 or SA3 of the adopted Cotswold District Local Plan as an essential or critical project?**

**~Total possible score: 20**

### Panel Advice for Question 1:

**This question addresses the STRATEGIC requirement.**

**The approach in these policies has moved on somewhat, so, if the project is not included in one of these policies but does refer to the overall aims and growth identified in the Local Plan, it may still attract a score of up to 10. Importantly, the project must have a STRATEGIC impact- so it must benefit a large number of residents or meet the needs of residents from more than one settlement.**

**The policies are:**

#### **Policy SA1 STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:

*Healthcare*

- Romney House Surgery, Tetbury - expansion or relocation; and
- New doctors' surgery in Cirencester.

*Flood management*

- SUDS and soft measure interventions to manage flood risk.

*Highways*

Junction improvements at:

- A429 / Cherrytree Lane, Cirencester;
- A417 (High Street) / A361 (Thames Street), Lechlade;
- A417 / Whelford Road, between Fairford and Lechlade;
- A429 / A433, between Cirencester and Kemble; and
- A433 (London Road / Long Street) / Hampton Street / New Church Street, Tetbury.

*Sport & Recreation*

- Re-use of the former Cirencester to Kemble and Tetbury to Kemble railway lines for cycling; and
- Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors

**Policy SA2 STRATEGIC DELIVERY - MID-COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the Mid-Cotswolds Sub-Area are:

Highways Improvement of Unicorn junction (A436/B4068), Stow-on-the-Wold

**Policy SA3 STRATEGIC DELIVERY - NORTH COTSWOLDS**

Within the context of Policy INF1, the strategic infrastructure requirements for the North Cotswolds Sub-Area are:

*Healthcare*

Expansion or replacement of doctors' surgery in Chipping Campden.

*Flood management*

Flood alleviation bund and channel to the north-west and south of Moreton-in-Marsh.

*Highways*

Improvements to A429 (Fosse Way),

Moreton-in-Marsh; Junction improvements at A429 (High Street)/A44 (Oxford Street),

Moreton-in-Marsh; and Junction improvements at A429 (High Street)/A44 (Bourton Road),

Moreton-in-Marsh.

*Education*

Expansion of Chipping Campden Secondary School.

**Question 1- Panel Feedback**

**Is the infrastructure project in policies SA1-3?**

**Yes  20 points / No**

**If answer is no-**

**Is the project strategic? Yes  capable of a score / No  0 points**

**\*a 0 score is an automatic disqualification for failure to meet the strategic test**

**Does the bid refer to other planning policies which support the need for the scheme?**

Yes  5 points / No  0 points

**Does the project respond to infrastructure needs identified in other evidence-based studies?**

Yes  5 points / No  0 points

**Reasons:**

The panel can see the merits of this scheme and carefully considered its detail. However, this scheme is not within the IDP or strategic policies and the strategic nature of the scheme (greater than local influence, scale of impact) has not been evidenced. The bid is therefore automatically excluded.

**Question 1 total score:**

0 / 20

**Question 2:**

**Is the project identified in the IFS as a CIL spending priority? If not, is there sufficient justification to fund a project that is not on the priority list?**

**~Total possible score: 20**

**Panel Advice for Question 2:**

**This question is outdated but remains in our matrix and needs to be answered.**

**The real aim of the question is the LEGAL requirement for CIL spending- *Regulation 59 of the Community Infrastructure Regulations 2010 (as amended) requires that CIL is spent to fund infrastructure which supports the development of its area.***

Our IFS list originated in 2016 (it's based on the Infrastructure Delivery Plan (IDP)). Back then, we identified infrastructure needed to support the housing and employment development in our Local Plan. It is a short list to increase road capacity to deal with the additional traffic from housing. In 2019, we declared a climate emergency and now prefer sustainable travel over private traffic/ road

improvements. The list also doesn't address other non-transport related infrastructure needs for healthy and sustainable communities.

The last IFS acknowledged made an important caveat- "The Council's focus has changed towards sustainable transport and enabling the modal shift away from car use as the main form of transport. Infrastructure projects that alleviate the pressure on these junctions via sustainable means are therefore preferred over projects that directly increase highway capacity as currently listed".

It's therefore important that you understand that not being included on the IFS list should not preclude bids. However, bids MUST show that they address the infrastructure needs arising from growth. We've broken this question down to help you answer it.

#### **The IFS List-**

<b>Parish</b>	<b>Project</b>
<b>Kemble</b>	<b>Junction improvements at A429/ A433, between Cirencester and Kemble</b>
<b>Kemble</b>	<b>Re-use of the former railway line for cycling (successful bid 2024)</b>
<b>Lechlade</b>	<b>Junction improvements at A417/ Whelford Road between Fairford and Lechlade</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (Fosseway)</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Oxford Street)</b>
<b>Moreton-in-Marsh</b>	<b>Junction improvements at A429 (High Street)/ A44 (Bourton Road)</b>
<b>Stow-on-the-Wold</b>	<b>Improvement of Unicorn junction (A436/B4068)</b>
<b>Tetbury</b>	<b>Junction improvements at A433 (London Road/ Long Street) / Hampton Street/ New Church Street</b>
<b>South Cotswolds</b>	<b>SUDS and soft measure interventions to manage flood risk</b>

#### **To determine whether the project responds to growth, you should discuss-**

- Does it respond to increased population (or increased in demographic groups such as children, older people or disabled people) by increasing the capacity or quality of existing services, or providing new services?
- Has the bid identified where that growth has come from/ evidenced it?
  - Have they referred to particular development?

- Have they referred to any infrastructure evidence studies?
- Has the bid identified *how* it will provide that service to our residents-
  - Will it be open and accessible to the public now and into the future? i.e. is it free or chargeable, if chargeable, where is the revenue going?  
**FYI- Private companies gaining profit are NOT providing infrastructure to the public and cannot be considered for bids.**
  - Does it explain how it will meet current and future needs?
  - What outreach/ advertising or other public engagement is planned?

### Question 2- Panel Feedback

**Is the infrastructure project on the IFS list?**

Yes  20 points / No  0 points

**OR- If answer is no-**

**Is the project for sustainable transport, walking or cycling?**

Yes  5 points / No  0 points

**Does the project respond to growth?**

**Score 0-10 points** \_\_\_\_\_

**\*a 0 score is an automatic disqualification for failure to meet the legal test**

**Reasons:**

**Question 2 total score:**

/ 20

### Question 3:

**Have you secured match funding to increase potential outputs from the project?**

**~Total possible score: 20**

**Panel Advice for Question 3:**

**This question addresses the RESPONSIBILITY requirement.**

**Community Infrastructure Levy funds are to be used for the public benefit. It is important that we can demonstrate that the investment of public money in the project provides services people need and value for money. Match-funding is one element of this, but sometimes match funding is not available.**

**You should consider:**

**Is the cost of the scheme justified?** i.e. Is there proof of different quotes? does the cost appear reasonably proportionate? Has the bidder provided any due-diligence information/ enough financial information?

**Does the project offer value for money?** i.e. is the amount of CIL investment balanced with the urgency, importance and scale of the community's need? Has match-funding been explored as an option?

**Does the project secure infrastructure for people now and in the future?** i.e. how long will the project serve the public? Is that balanced with the amount of investment? Does the bidder control the land and/or infrastructure asset that will result from the investment so that we can be confident it will remain open to the public?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent).

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

**Question 3- Panel Feedback**

**Has match-funding been secured?**

**Yes  10 points / No  0 points**

**OR**

**Has the bid examined all funding possibilities and robustly justified why these have not been pursued?**

Yes  5 points / No  0 points

**Is the cost of the scheme justified, and does it offer value for money?**

Score 0-10 points \_\_\_\_\_

**\*a 0 score is an automatic disqualification for failure to meet the responsibility test**

**Reasons:**

Question 3 total score:  
/ 20

**Question 4:**

**Is the project deliverable and what is the time frame? Have you considered alternative options to deliver the outcome of your project? Are enough CIL funds currently available?**

**~Total possible score: 30**

**Panel Advice for Question 3:**

**This group of questions address the ACCOUNTABILITY requirement.**

**If we are investing public money in infrastructure projects, we have to be certain that the project can and will go ahead. This means understanding when and how the project will be delivered, who will be accountable and whether it is properly funded.**

**You should consider:**

**Is the project deliverable?** I.e. has the bidder provided a project plan? Are there clear roles and responsibilities? Is there a timescale involved? Does the bidder have a track record of delivering similar projects or can then point to similar feasible examples? Does the bid explain how the providers will report progress back to the Council?

**Has the bid considered alternative options?** Is the bid the best and most effective route for meeting the needs identified? This is particularly important where there are competing bids for similar infrastructure, or where the scheme seeks a large investment into infrastructure which is to meet future needs (are the needs known and is the extent of investment justified?). Aside from the match-funding question, is CIL the best route for this infrastructure- are there other responsible bodies who could provide this infrastructure?

**Are enough CIL funds currently available?**

**This can automatically exclude bids.** If there is sufficient funding, but the scheme seeks a large financial investment of CIL- does the bid phase the development so that CIL funding can be drawn down only when required? Does the bid provide for future revenue to maintain the infrastructure into the future (the greater the investment, the longer term the infrastructure maintenance should be secured)?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent). We can allocate money for contingency funding, on the basis that a separate request for the money will need to be made alongside proof of the additional cost/ spend. Contingency costs must be noted.

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

#### **Question 4- Panel Feedback**

**Is the project deliverable?**

Yes  Score 0-10 points \_\_\_\_\_ / No  0

\*a 0 score is an automatic disqualification

**Has the bid considered alternative options?**

Yes  Score 0-10 points \_\_\_\_\_ / No  0

**Are there enough CIL funds available?**

Yes  Score 0-10 points \_\_\_\_\_ / No  0

\*a 0 score is an automatic disqualification

**Are there any costs which should not be included?** Yes  No

**If yes, specify-**

**Contingency- proportion against whole cost, amount to be calculated.**

**Reasons:**

**Question 4 total score:**

/ 30

**Summary Panel Feedback**

**Has the bid been disqualified?** Yes  No

**Total score** \_\_\_\_\_ 0

**Recommendation for funding?** Yes  No

**Any costs to be removed?** Yes  No

**If yes, please specify-**

**Total recommended for funding (if applicable) \_\_\_\_\_ 0**

**Overall feedback for bidder:**

The panel is familiar with the car park in question and understands the motivations behind this bid. The panel would also like to thank the bidder for the efforts they made in making this bid. However, as outlined above, this scheme is not within the IDP or strategic policies and the strategic nature of the scheme (greater than local influence, scale of impact) has not been evidenced. The bid is therefore automatically excluded.

## Community Infrastructure Levy (CIL) Bid Panel Feedback Sheet

### Strategic Fund

CIL is for investment in infrastructure which meets local needs. It must be spent in the public interest and the rules around spending it are strict.

Bidders have been made aware of these requirements and several sought additional advice. Bidders who engaged with this process were given the opportunity to amend their bids according to the scoring matrix and officer advice.

This checklist will be provided as feedback to any unsuccessful bidders, so please ensure you fill in the boxes.

<b>Bid Name</b>	<b>Cycle parking Cotswold National Cycle Network (NCN)</b>
<b>Bidder</b>	<b>Gloucestershire County Council (GCC) and Sustrans (now Walk Wheel Cycle Trust)</b>
<b>Proposed infrastructure project</b>	<b>Cycle parking facilities across network settlement hubs.</b>
<b>Amount of bid</b>	<b>£27,000.00</b>

#### Question 1:

**Is the project identified in policies SA1, SA2 or SA3 of the adopted Cotswold District Local Plan as an essential or critical project?**

**~Total possible score: 20**

#### Panel Advice for Question 1:

**This question addresses the STRATEGIC requirement.**

**The approach in these policies has moved on somewhat, so, if the project is not included in one of these policies but does refer to the overall aims and growth identified in the Local Plan, it may still attract a score of up to 10. Importantly, the project must have a STRATEGIC impact- so it must benefit a large number of residents or meet the needs of residents from more than one settlement.**

**The policies are:**

**Policy SA1 STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:

*Healthcare*

- Romney House Surgery, Tetbury - expansion or relocation; and
- New doctors' surgery in Cirencester.

*Flood management*

- SUDS and soft measure interventions to manage flood risk.

*Highways*

Junction improvements at:

- A429 / Cherrytree Lane, Cirencester;
- A417 (High Street) / A361 (Thames Street), Lechlade;
- A417 / Whelford Road, between Fairford and Lechlade;
- A429 / A433, between Cirencester and Kemble; and
- A433 (London Road / Long Street) / Hampton Street / New Church Street, Tetbury.

*Sport & Recreation*

- Re-use of the former Cirencester to Kemble and Tetbury to Kemble railway lines for cycling; and
- Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors

**Policy SA2 STRATEGIC DELIVERY - MID-COTSWOLDS SUB-AREA**

Within the context of Policy INF1, the strategic infrastructure requirements for the Mid-Cotswolds Sub-Area are:

Highways Improvement of Unicorn junction (A436/B4068), Stow-on-the-Wold

**Policy SA3 STRATEGIC DELIVERY - NORTH COTSWOLDS**

Within the context of Policy INF1, the strategic infrastructure requirements for the North Cotswolds Sub-Area are:

*Healthcare*

Expansion or replacement of doctors' surgery in Chipping Campden.

*Flood management*

Flood alleviation bund and channel to the north-west and south of Moreton-in-Marsh.

*Highways*

Improvements to A429 (Fosse Way),

Moreton-in-Marsh; Junction improvements at A429 (High Street)/A44 (Oxford Street),

Moreton-in-Marsh; and Junction improvements at A429 (High Street)/A44 (Bourton Road),

Moreton-in-Marsh.

*Education*

Expansion of Chipping Campden Secondary School.

**Question 1- Panel Feedback**

**Is the infrastructure project in policies SA1-3?**

**Yes  20 points / No**

<b>If answer is no-</b>
<b>Is the project strategic? Yes <input type="checkbox"/> capable of a score / No <input type="checkbox"/> 0 points</b>
<b>*a 0 score is an automatic disqualification for failure to meet the strategic test</b>
<b>Does the bid refer to other planning policies which support the need for the scheme?</b> <b>Yes <input type="checkbox"/> 5 points / No <input type="checkbox"/> 0 points</b>
<b>Does the project respond to infrastructure needs identified in other evidence-based studies?</b> <b>Yes <input type="checkbox"/> 5 points / No <input type="checkbox"/> 0 points</b>
<b>Reasons:</b>  <i>This proposal would provide for cycle parking facilities across the District, in line with the aims of Policies SA1-3. Policy SA1 specifically refers to Cycling infrastructure in Cirencester. Whilst policies SA2-3 refer to road junction improvements, the panel considers that the proposal meets the overall aims of improving connectivity generally, albeit by non-private car means. The improvements suggested in this bid meet therefore meet the strategic infrastructure requirements of the existing Local Plan in a sustainable way in line with the modal shift aspirations of both the Council and the County Council.</i>  <i>As the project is recognised in the strategic policies of the Local Plan, it automatically garners a full score of 20.</i>
<b>Question 1 total score:</b> 20/20

<b>Question 2:</b>
<b>Is the project identified in the IFS as a CIL spending priority? If not, is there sufficient justification to fund a project that is not on the priority list?</b>
<b>~Total possible score: 20</b>

**Panel Advice for Question 2:**

**This question is outdated but remains in our matrix and needs to be answered.**

**The real aim of the question is the LEGAL requirement for CIL spending-  
*Regulation 59 of the Community Infrastructure Regulations 2010 (as amended) requires that CIL is spent to fund infrastructure which supports the development of its area.***

Our IFS list originated in 2016 (it's based on the Infrastructure Delivery Plan (IDP)). Back then, we identified infrastructure needed to support the housing and employment development in our Local Plan. It is a short list to increase road capacity to deal with the additional traffic from housing. In 2019, we declared a climate emergency and now prefer sustainable travel over private traffic/ road improvements. The list also doesn't address other non-transport related infrastructure needs for healthy and sustainable communities.

The last IFS acknowledged made an important caveat-  
"The Council's focus has changed towards sustainable transport and enabling the modal shift away from car use as the main form of transport. Infrastructure projects that alleviate the pressure on these junctions via sustainable means are therefore preferred over projects that directly increase highway capacity as currently listed".

It's therefore important that you understand that not being included on the IFS list should not preclude bids. However, bids MUST show that they address the infrastructure needs arising from growth. We've broken this question down to help you answer it.

**The IFS List-**

Parish	Project
Kemble	<b>Junction improvements at A429/ A433, between Cirencester and Kemble</b>
Kemble	<b>Re-use of the former railway line for cycling (successful bid 2024)</b>
Lechlade	<b>Junction improvements at A417/ Whelford Road between Fairford and Lechlade</b>
Moreton-in-Marsh	<b>Junction improvements at A429 (Fosseway)</b>
Moreton-in-Marsh	<b>Junction improvements at A429 (High Street)/ A44 (Oxford Street)</b>
Moreton-in-Marsh	<b>Junction improvements at A429 (High Street)/ A44 (Bourton Road)</b>

<b>Stow-on-the-Wold</b>	<b>Improvement of Unicorn junction (A436/B4068)</b>
<b>Tetbury</b>	<b>Junction improvements at A433 (London Road/ Long Street) / Hampton Street/ New Church Street</b>
<b>South Cotswolds</b>	<b>SUDS and soft measure interventions to manage flood risk</b>

**To determine whether the project responds to growth, you should discuss-**

- Does it respond to increased population (or increased in demographic groups such as children, older people or disabled people) by increasing the capacity of quality of existing services, or providing new services?
- Has the bid identified where that growth has come from/ evidenced it?
  - Have they referred to particular development?
  - Have they referred to any infrastructure evidence studies?
- Has the bid identified *how* it will provide that service to our residents-
  - Will it be open and accessible to the public now and into the future? i.e. is it free or chargeable, if chargeable, where is the revenue going?  
**FYI- Private companies gaining profit are NOT providing infrastructure to the public and cannot be considered for bids.**
  - Does it explain how it will meet current and future needs?
  - What outreach/ advertising or other public engagement is planned?

## Question 2- Panel Feedback

**Is the infrastructure project on the IFS list?**

**Yes  20 points / No  0 points**

**OR- If answer is no-**

**Is the project for sustainable transport, walking or cycling?**

**Yes  5 points / No  0 points**

**Does the project respond to growth?**

**Score 0-10 points \_8**

**\*a 0 score is an automatic disqualification for failure to meet the legal test**

### **Reasons:**

The panel welcomes this sustainable transport cycling scheme, which aligns with the spatial strategy and meets objectives in the LCWIP.

The panel considers the proposal to be a well evidenced response to demonstrated needs. The proposal appears to take a targeted and wide-reaching approach which is focussed on identified growth hubs. The panel particularly notes that the scheme covers most of district.

The panel is pleased to see the scheme is supported by local statistics and detailed evidence and commends the bidders for the quality of this element of the bid.

The panel has no doubts that the scheme would meet the legal test for CIL investment. The car parking specialist members of the panel would like it noted that there is often an assumption that cycle stands and lockers are located within car parks, however, this should be actively discouraged as it reduces the overall number of available spaces and car parks are not the ideal place for bicycle storage. The panel would encourage further liaison with the bidder and car park providers/ the Council's car-parking team regarding the locations of these facilities.

**Question 2 total score:**  
**13/ 20**

**Question 3:**

**Have you secured match funding to increase potential outputs from the project?**

**~Total possible score: 20**

**Panel Advice for Question 3:**

**This question addresses the RESPONSIBILITY requirement.**  
**Community Infrastructure Levy funds are to be used for the public benefit. It is important that we can demonstrate that the investment of public money in the project provides services people need and value for money. Match-funding is one element of this, but sometimes match funding is not available.**

**You should consider:**

**Is the cost of the scheme justified?** i.e. Is there proof of different quotes? does the cost appear reasonably proportionate? Has the bidder provided any due-diligence information/ enough financial information?

**Does the project offer value for money?** i.e. is the amount of CIL investment balanced with the urgency, importance and scale of the community's need? Has match-funding been explored as an option?

**Does the project secure infrastructure for people now and in the future? i.e.** how long will the project serve the public? Is that balanced with the amount of investment? Does the bidder control the land and/or infrastructure asset that will result from the investment so that we can be confident it will remain open to the public?

**Bids should NOT include funding for:**

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional funds** (we cannot provide public money which may not be spent).

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

### Question 3- Panel Feedback

**Has match-funding been secured?**

Yes  10 points / No  0 points

OR

**Has the bid examined all funding possibilities and robustly justified why these have not been pursued?**

Yes  5 points / No  0 points

**Is the cost of the scheme justified, and does it offer value for money?**

**Score 8 (0-10 points)**

**\*a 0 score is an automatic disqualification for failure to meet the responsibility test**

#### **Reasons:**

The cost to benefit of this scheme has been well-evidenced. Whilst detail around match-funding opportunities would have been desirable and should be embedded into future bids from this bidder, the panel nonetheless considers the overall funding ask is reasonable and proportionate to the scheme. As such, the bid garners a robust score from its justification.

The justification of cost did not receive a full score, as the panel would query whether the secure cycle parking would become self-sustaining over time.

Question 3 total score: 8 / 20
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#### Question 4:

**Is the project deliverable and what is the time frame? Have you considered alternative options to deliver the outcome of your project? Are enough CIL funds currently available?**

**~Total possible score: 30**

#### Panel Advice for Question 4:

**This group of questions address the ACCOUNTABILITY requirement. If we are investing public money in infrastructure projects, we have to be certain that the project can and will go ahead. This means understanding when and how the project will be delivered, who will be accountable and whether it is properly funded.**

#### You should consider:

**Is the project deliverable?** I.e. has the bidder provided a project plan? Are there clear roles and responsibilities? Is there a timescale involved? Does the bidder have a track record of delivering similar projects or can then point to similar feasible examples? Does the bid explain how the providers will report progress back to the Council?

**Has the bid considered alternative options?** Is the bid the best and most effective route for meeting the needs identified? This is particularly important where there are competing bids for similar infrastructure, or where the scheme seeks a large investment into infrastructure which is to meet future needs (are the needs known and is the extent of investment justified?). Aside from the match-funding question, is CIL the best route for this infrastructure- are there other responsible bodies who could provide this infrastructure?

#### Are enough CIL funds currently available?

**This can automatically exclude bids.** If there is sufficient funding, but the scheme seeks a large financial investment of CIL- does the bid phase the development so that CIL funding can be drawn down only when required? Does the bid provide for future revenue to maintain the infrastructure into the future (the greater the investment, the longer term the infrastructure maintenance should be secured)?

#### Bids should NOT include funding for:

- **Cost of officer time of the bidder** (consultant professional fees for expert advice/ construction are permissible)
- **Contingency or 'just in case' additional** funds (we cannot provide public money which may not be spent). We can allocate money for contingency funding, on the basis that a separate request for the money will need to be made alongside proof of the additional cost/ spend. Contingency costs must be noted.

**Bids that include these costs can still pass the responsibility test, BUT these costs MUST removed from the bids (please note this in the response).**

#### Question 4- Panel Feedback

**Is the project deliverable?**

Yes  Score 0-10 points \_9\_\_ / No  0

**\*a 0 score is an automatic disqualification**

**Has the bid considered alternative options?**

Yes  Score 0-10 points \_5\_\_ / No  0

**Are there enough CIL funds available?**

Yes  Score 0-10 points \_9\_\_ / No  0

**\*a 0 score is an automatic disqualification**

**Are there any costs which should not be included?** Yes  No

**If yes, specify-**

An unclear amount of contingency has been added.

#### **Reasons:**

The panel recognises that the County Council has a good and well-established record of delivering schemes of this type and that it has a good working relationship with the Walk, Wheel and Cycle Trust (WWCT). The WWCT also has a good record of facilitating such schemes. The panel opts to give just shy of full points due to the query above regarding locations for the facilities.

The panel was satisfied that alternative options had been touched upon within the bid and accordingly awarded a mid-score.

There are enough CIL funds available for this scheme when considered in isolation, however, the bids received in 2025 exceeds the current balance of CIL in their totality. Nonetheless, this scheme has a relatively low and proportionate funding ask, and as such the panel opts to give just shy of full points in this respect.

An unclear amount of contingency has been added, which will need to be identified and separated out. The panel also notes as above that contingency fees cannot be paid out up-front and would be removed from any initial transfer of funds should the bid be successful. Evidence would then need to be provided to justify the draw-down of additional funds should the project cost more to implement than anticipated. The panel would have liked to have seen contingency clearly earmarked and shown as a proportion of the overall costing.

**Question 4 total score:**

**23/30**

**Summary Panel Feedback**

**Has the bid been disqualified?** Yes  No

**Total score** 63/100

**Recommendation for funding?** Yes  No

**Any costs to be removed?** Yes  No

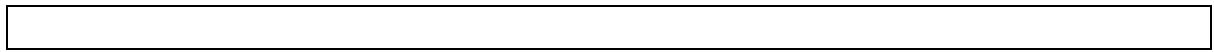
**If yes, please specify-**

Contingency fees must be noted. They can be included as a separate total for a later draw-down.

**Total recommended for funding (if applicable)** £27,000.00 (contingency arrangements)

**Overall feedback for bidder:**

The panel would like to thank the bidders for this detailed and well justified bid. The panel feels the bid has been well structured. The panel is pleased to recommend the scheme for funding and looks forward to seeing positive outcomes. The panel would like to invite the bidders to engage with the Council regarding the locations of the facilities.



# Agenda Item 18



**COTSWOLD**  
District Council

Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>OVERVIEW &amp; SCRUTINY – 5 JANUARY 2026 CABINET – 8 JANUARY 2026</b>
Subject	<b>FLEET REPLACEMENT PROGRAMME</b>
Wards affected	All
Accountable member	Councillor Andrea Pellegram, Cabinet Member for Environment & Regulatory Services Email: <a href="mailto:Andrea.Pellegram@cotswold.gov.uk">Andrea.Pellegram@cotswold.gov.uk</a>
Accountable officer	Helen Martin, Director of Communities & Place Email: <a href="mailto:Helen.Martin@cotswold.gov.uk">Helen.Martin@cotswold.gov.uk</a>
Report author	Peta Johnson, Head of Waste & Environment Email: <a href="mailto:Peta.Johnson@cotswold.gov.uk">Peta.Johnson@cotswold.gov.uk</a>
Summary/Purpose	<ul style="list-style-type: none"> <li>• To review the Capital Fleet Replacement Programme and identify the vehicles for replacement in 2026/27.</li> <li>• To agree the next steps towards the decarbonisation of the waste services.</li> </ul>
Annexes	Annex A – Risk Assessment, Fleet Replacement
Recommendation(s)	<p>That Cabinet resolves to:</p> <ol style="list-style-type: none"> <li>1. Approve the replacement of vehicles in line with the updated Capital Fleet Replacement Programme (Paragraph 5.3) up to a total of thirty-one vehicles.</li> <li>2. Approve steps towards the decarbonisation of waste services through the purchase of one electric kerbside-sort vehicle (one of the thirty-one vehicles identified above) and a shift to using Hydrotreated Vegetable Oil (HVO) as a replacement to diesel.</li> <li>3. Include the reprofiled capital expenditure for 2026/27 in the Capital Programme that will be considered by Cabinet and Council in February 2026.</li> </ol>



Corporate priorities	<ul style="list-style-type: none"><li>• Delivering Good Services</li><li>• Responding to the Climate Emergency</li></ul>
Key Decision	YES
Exempt	NO
Consultees/ Consultation	<ul style="list-style-type: none"><li>• Cabinet Member for Environment and Regulatory Services</li><li>• Corporate Leadership Team</li></ul>



## **1. EXECUTIVE SUMMARY**

- 1.1** This report reviews the Capital Fleet Replacement Programme and sets out the vehicles scheduled for replacement in 2026/27. The kerbside-sort system will continue, supporting compliance with Simpler Recycling and the future collection of plastic film.
- 1.2** Extending vehicle life was considered but rejected due to risks of service disruption and higher maintenance costs.
- 1.3** The waste and environment services account for 43% of Council emissions, making decarbonisation critical to achieving the Council's target of 80% carbon reduction by 2030.
- 1.4** The updated programme increases the forecast of capital expenditure in 2026/27 by £0.350m reflecting the additional cost of one electric vehicle and the early replacement of a 7.5t Refuse Collection Vehicle due to reliability issues.
- 1.5** The capital expenditure estimate for 2026/27 is £6.0m reflecting planned slippage from 2025/26 and bringing forward planned expenditure from 2027/28.
- 1.6** A further planned measure is the use of Hydrotreated Vegetable Oil (HVO) this is a diesel replacement that lowers emissions. Market prices currently reflect a higher HVO cost against diesel. Should this differential remain, other things being equal there will be an increased revenue cost in 2026/27. This will be included in the 2026/27 Revenue Budget, Capital Programme and Medium-Term Financial Plan report to Cabinet in February 2026.
- 1.7** These measures balance operational reliability, legislative compliance and climate objectives, while providing a framework to monitor costs and carbon savings for future planning.

## **2. BACKGROUND**

- 2.1** The Council has a Capital Fleet Replacement Programme that describes the lifecycle replacement of vehicles used for the delivery of household waste collection, street cleansing services and grounds maintenance services. The Programme covers the years 2025/26 through to 2032/33.
- 2.2** The Programme assumes that like-for-like replacements are planned when an asset has reached the end of its operational life, with the operational life of an asset being determined at the point of purchase (e.g. seven years for a Refuse Collection Vehicle or RCV).



**2.3** Each year the condition of the assets is reviewed and the Programme is refreshed. Replacement may be brought forward or delayed depending on factors such as vehicle reliability.

**2.4** This report:

- Considers waste collection service design in the context of wider industry changes.
- Describes the carbon emissions of the waste and environment services and what steps can be taken at this point to reduce carbon emissions.
- Describes the vehicles scheduled for replacement in 2026/27.

**2.5** The Capital Programme, as approved by Council on 24 February 2025, includes capital budget provision for the Fleet Replacement Programme. For the period 2025/26 to 2028/29, a total of £7.818m was included in the capital expenditure plans with the expenditure profile indicating £5.171m for 2026/27.

**2.6** This report provides members with an updated expenditure profile for 2026/27 which includes slippage from 2025/26 and brings forward planned expenditure from 2027/28. This report will not consider the capital financing implications as this will be included in later reports to:

- Audit and Governance Committee (27 January 2026) – Annual Capital Strategy 2026/27.
- Overview and Scrutiny Committee (02 February 2026) and Cabinet (05 February 2026) – 2026/27 Revenue Budget, Capital Programme and Medium-Term Financial Strategy.

### **3. WASTE COLLECTION SERVICE DESIGN**

**3.1** The vehicles under consideration largely relate to the delivery of recycling and food waste collections to residents. The planned replacement of these vehicles drives us to consider the design of these services.

**3.2** Three main classifications of recycling systems are generally used in England:

- **Commingled**, where recyclables are presented in a wheeled bin and collected mixed.
- **Twin-stream**, where materials are typically presented in a wheeled bin plus a box or sack and collected as two separate groups of recyclables (paper/card and cans/plastic/glass).



- **Kerbside-sort**, where materials are presented in a range of boxes and sacks and sorted at the kerbside by operatives into a multi-compartment vehicle.

**3.3** All systems are in operation across the six Waste Collection Authorities of Gloucestershire (one commingled, one twin-stream, four kerbside-sort). The Council provides a kerbside-sort system of collection to residents.

**3.4** There is no one right way to provide recycling services; each has its positives and negatives. Kerbside-sort allows the collection of an extensive range of materials, including textiles and small Waste Electronic and Electrical Equipment (sWEEE) and produces high-quality materials. It is also associated with low costs relating to the processing of recyclables in preparation for sale. The cost of collection is relatively high compared to other systems of collection.

**3.5** Twin-stream and commingled collections are often associated with cheaper costs of collection but higher processing costs. On balance, the costs of operating all three systems are similar. However, twin-stream and commingled collections may not support the collection of a wide range of materials. The collection of textiles and sWEEE can be more challenging. This system may also represent a barrier to the collection of additional material streams.

**3.6** A change in the system of collection would come with significant mobilisation costs, a re-routing exercise and significant capital investment in containers. It could limit the Council's ability to add additional materials to the collection services.

**3.7** A range of legislation and policy changes are happening in the waste sector including Simpler Recycling. Simpler Recycling places an obligation on councils to collect a specific range of recyclables from residents. The Council is compliant with the requirements of Simpler Recycling that need to be in place by 31 March 2026. By 31 March 2027, we will need to add plastic film to our collection services to remain compliant with Simpler Recycling. Continuation of the kerbside-sort system and the replacement of vehicles support the additional collection of plastic film. Vehicles will be designed to accommodate this updated range of recyclables.

**3.8** The kerbside-sort system will therefore be continued.

**4. CARBON EMISSIONS OF WASTE AND ENVIRONMENT SERVICES**

**4.1** The Council declared a climate emergency in July 2019 and has committed to making our activities net-zero carbon as soon as possible, aiming for an 80% reduction



against a 1990 baseline by 2030 and a 100% reduction by 2045, with no reliance on offsetting or the trading of carbon credits.

- 4.2** The waste and environment services contribute a high proportion of our emissions (43%) and therefore options for decarbonisation have been considered.
- 4.3** Alternatively powered vehicles can be considered at the point of lifecycle replacement (e.g. electric vehicles) or an alternative fuel can be considered at any point (e.g. Hydrotreated Vegetable Oil or HVO).
- 4.4** Manufacturer produced electric kerbside-sort vehicles have been available since 2023. The standard vehicles have a limited range (up to one hundred miles on a single charge) which is not sufficient to provide services across the Council area, with an appropriate buffer that considers the operation of vehicles in all weather conditions.
- 4.5** A vehicle with an increased battery size has been assessed (from 210 kWh to 280 kWh) and is believed to provide the necessary range.
- 4.6** The Capital Fleet Replacement Programme has been updated to reflect that one of the kerbside-sort vehicles will be replaced with an electric rather than diesel powered version. This increases the capital expenditure estimate by £0.200m.
- 4.7** The electric vehicle will be used as a proof of concept to understand the operation of this vehicle type in our area and plan for future fleet replacements. This will include building an understanding of the total cost of vehicle ownership including expected savings in fuel costs and maintenance.
- 4.8** One electric vehicle will assist in reducing carbon emissions but not significantly so an additional measure has been considered.
- 4.9** The fleet can be transitioned to operating using Hydrotreated Vegetable Oil (HVO) rather than diesel.
- 4.10** HVO is a drop in fuel, i.e. can be used in diesel vehicles with no alterations to the engine. It is estimated to provide an 80% to 90% reduction in net CO<sub>2</sub> emissions. Ubico has experience of using HVO in other areas of Gloucestershire.
- 4.11** However, it cannot be purchased from forecourts, so needs to be ordered in bulk and stored in a tank at the depot which would require the installation of a fuel tank at the depot. The Capital Programme includes an estimate of £0.060m and this will be



reviewed to ensure adequate budget provision is made. The installation of a fuel tank may be subject to a planning application where this consent is not already in place.

**4.12** The fuel price fluctuates but is typically more than forecourt prices. Market prices currently reflect a higher HVO cost against diesel. Should this differential remain, other things being equal there will be an increased revenue cost in 2026/27. This will be included in the 2026/27 Revenue Budget, Capital Programme and Medium-Term Financial Plan report to Cabinet in February 2026.

**4.13** HVO is produced using cooking oil or palm oil and we would need to ensure that the fuel is not made from palm oil as this is linked to deforestation. As more fleets transition to HVO, supply may become more limited, however, if supply did become limited, we would be able to move back to using diesel with no implications to the operation of the fleet.

**4.14** In any case, it may be prudent to consider a mechanism that balances the need to reduce carbon emissions by 2030, against the affordability envelope of the services. Fuel usage will be monitored on a monthly basis against both HVO and diesel prices. The Council will need to develop an appropriate mechanism for monitoring the financial and climate implications for the move to HVO to ensure the costs and environmental benefits are considered in the round. This would mitigate the risk that the decision to transition to HVO is not reviewed and the Council incurs significant and ongoing revenue costs.

**4.15** The additional costs incurred will be summarised, together with the carbon savings, to provide a cost per tonne of carbon saved. This measure can be used to plan for future budgets or to evaluate alternative means to reduce carbon emissions.

## **5. VEHICLES SCHEDULED FOR REPLACEMENT IN 2026/27**

**5.1** The majority of spend has been previously identified in the Capital Programme. This includes funding to replace two kerbside-sort vehicles and one cage vehicle originally scheduled for replacement in 2025/26, which are now planned for replacement in 2026/27.

**5.2** There are however, two further changes:

1. The additional cost of one electric kerbside-sort vehicle (this electric vehicle will be in place of, rather than being in addition to, a diesel kerbside-sort vehicle)



2. The replacement of one 7.5t RCV has been brought forward from 2027/28 and will now be replaced in 2026/27. This is due to ongoing issues with the reliability of the current vehicle, which has led to service disruption to residents.

**5.3** Therefore, the updated Capital Fleet Replacement Programme (CFRP) for 2026/27 is as follows:

<b>Previous CFRP Replacement Year</b>	<b>Vehicle Type</b>	<b>Number of Vehicles</b>	<b>Updated Position – Replacement in 2026/27</b>
2025/26	Kerbside-sort Vehicle (diesel) Cage Vehicle	2 1	Costs are in line with previous CFRP
2026/27	Kerbside-sort Vehicle (diesel) Kerbside-sort Vehicle (EV) Food Waste Vehicle Refuse Collection Vehicles (RCV) Mechanical Sweeper Refuse Collection Vehicle (7.5t)	15 1 5 3 3 1	+£200k (additional cost as one vehicle will be electric powered, not fuelled by diesel)
2027/28			+£150k (spend brought forward from 2026/27)

<b>Fleet Replacement Capital Expenditure Plans</b>	<b>2025/26 Budget (£'000)</b>	<b>2026/27 Budget (£'000)</b>	<b>2027/28 Budget (£'000)</b>	<b>2028/29 Budget (£'000)</b>	<b>TOTAL Budget (£'000)</b>
As per February 2025 Capital Programme	771	5,171	1,740	117	7,799
Current forecast	292	6,000	1,590	117	7,999
<b>Change</b>	<b>(479)</b>	<b>829</b>	<b>(150)</b>	<b>0</b>	<b>200</b>



## **6. ALTERNATIVE OPTION – EXTEND THE OPERATIONAL LIFE OF VEHICLES**

- 6.1** Rather than replace the identified vehicles, a decision could be made to extend their operational life.
- 6.2** Extending the operational life of these vehicles is not recommended as it will increase maintenance costs and reduce the reliability of these vehicles. This may lead to increased hire costs where vehicles are brought in on a temporary basis to support service delivery.
- 6.3** Where the reliability of these vehicles is reduced, this could lead to service disruption and could impact residents directly through increased missed collections and service failures.
- 6.4** Although not recommended for this fleet replacement, the option to extend the operational life of vehicles will be considered for future fleet replacements.

## **7. CONCLUSIONS**

- 7.1** The updated Capital Fleet Replacement Programme for 2026/27 ensures the Council maintains a reliable fleet to deliver waste and environmental services while meeting legislative requirements and advancing climate objectives. The proposed measures of replacing up to thirty-one vehicles, introducing one electric kerbside-sort vehicle and transitioning to HVO, represent a balanced approach that prioritises service continuity, compliance with Simpler Recycling and significant carbon reduction.
- 7.2** The additional capital investment of £0.200m for the electric vehicle and revenue implications for HVO (to be considered in the 2026/27 Revenue Budget, Capital Programme and Medium-Term Financial Strategy report) are necessary to evaluate alternative technologies and fuels, providing valuable insight into operational performance and cost implications. These steps will support the Council's commitment to achieving an 80% reduction in carbon emissions by 2030.
- 7.3** Extending the operational life of vehicles was considered but rejected due to risks of increased maintenance costs, service disruption and reduced reliability. The recommended approach offers a clear pathway to decarbonisation while maintaining high-quality services for residents.

## **8. FINANCIAL IMPLICATIONS**

- 8.1** This report provides an updated Fleet Replacement schedule for 2026/27 with an increase in expenditure from £5.171m to £6.000m as set out in Section 5 of the report.



**8.2** The Capital Programme, as approved by Council in February 2025, included total expenditure estimates of £7.818m over the period 2025/26 to 2028/29. As noted in paragraph 8.1 above, the forecast for 2026/27 increases by £0.829m. This should be seen in the context of the wider programme as the increase reflects planned slippage from 2025/26 and planned expenditure from 2027/28. The additional cost in 2026/27 should be viewed as £0.200m on that basis.

**8.3** This report does not consider the capital financing implications. These will be included in the Annual Capital Strategy 2026/27 report and the 2026/27 Revenue Budget, Capital Programme and Medium-Term Financial Strategy report.

**8.4** Further work is needed to finalise the wider revenue and capital expenditure plans to understand the Treasury Management and capital financing options. However, members should note that the intention is to reduce or remove the need to undertake prudential borrowing to finance the capital programme.

## **9. LEGAL IMPLICATIONS**

**9.1** The Council has a statutory duty to collect household waste including the separate collection of recyclables under the Environmental Protection Act 1990.

**9.2** Procurement of any new vehicles will need to be undertaken in accordance with the Council's Contract Rules.

## **10. RISK ASSESSMENT**

**10.1** A risk assessment is provided in Annex A. This describes risks related to:

- Vehicles reaching the end of their economic life.
- Ongoing reliability issues of a 7.5 tonne RCV
- The climate change emergency.
- Simpler Recycling requirement to roll out plastic film collections to residents.
- Legislation changes and potential impact on services.

## **11. EQUALITIES IMPACT**

**11.1** Continuation of an existing service to residents. No equality impacts are identified.

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

**12.1** To understand the implications on the Council's carbon emissions of fuelling the waste fleet using HVO, two scenarios are described:

Scenario One: 100% of fuel use is HVO.

**12.2** Estimated to remove 42% of council carbon emissions. This assumes council waste fleet emissions remain 43% of the Council's total carbon emissions. Whilst the exact



proportion of carbon emissions the waste fleet makes up is expected to fluctuate, it is not expected to deviate wildly away from 43%. The 42% savings figure assumes the litres of fuel consumed remains the same as 2024/25 and that carbon emission factors of fuels (both diesel and HVO) remain the same as 2024. We are not aware of any significant planned changes to carbon emission factors of fuels.

Scenario Two: 50% of fuel use is HVO.

**12.3** Estimated to remove 21% of council carbon emissions based on the assumptions described above.

Contribution to Carbon Reduction Against 1990 Baseline

**12.4** As previously indicated, the Council is aiming for an 80% reduction in carbon emissions against a 1990 baseline by 2030 and a 100% reduction by 2045.

**12.5** To date the Council has achieved a 41% reduction against the 1990 baseline. Using the above assumptions, fuelling the waste fleet with 100% HVO would move the Council to a 66% carbon emission reduction against the 1990 baseline (fuelling the waste fleet with 50% HVO would equate to a 54% reduction against the 1990 baseline).

The Use of HVO Should Be Kept Under Review

**12.6** Whilst these figures are attractive, caution needs to be adopted with regards HVO. Although Ubico complies with all the current sustainability regulations when sourcing it, it is having to continually seek assurances when placing HVO fuel orders with suppliers whilst an EU and UK Government-wide sustainability fraud investigation is underway. Therefore, the use of HVO will have to be kept under review.

**12.7** In addition, there is a limit to the amount of genuine waste material that can be turned into HVO and as demand increases, so does the risk of more unsustainable sources entering the market. Therefore, it is unlikely that it will be a sustainable solution in the long-term but offers a potential interim solution whilst longer-term decarbonisation solutions become practicable i.e. EVs.

### **13. BACKGROUND PAPERS**

**13.1** [none]

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CDC Fleet Replacement Risk Register									
DIRECTORATE: Communities and Place									
SERVICE AREA: Waste and Environment									
ID	Risk/ Opportunity Summary	Risk/ Opportunity Description of Impact	Initial Risk Score			Internal Controls	Current/Residual Risk Score		
			Original Impact	Original Likelihood	Original Risk Score		Impact	Likelihood	Risk Score
1	Vehicles are scheduled for replacement on the Capital Fleet Replacement Programme as they are reaching the predicted end of their <b>economic life</b> .	The reliability of these vehicles will decline over time leading to increased disruption to residents, increases in the cost of maintenance, and increases in costs from the hire of replacement vehicles.	5	5	25	Replacement vehicles to be procured. This will lead to a high capital expenditure ( <b>circa. £6m</b> ) but will reduce annual maintenance cost and reduce the reliance on hire vehicles.	3	3	9
2	A <b>7.5 tonne RCV</b> is scheduled for replacement in 2027/28 but has reliability issues and is regularly off the road.	The 7.5 tonne RCV is used to collect refuse and garden waste from narrow access properties. As this is a specialist vehicle limited support can be provided by other vehicles in the fleet. A hire vehicle has been in use to increase the resilience of this service and reduce the impact on residents. The hiring of a vehicle incurs additional costs.	3	3	9	The replacement of this vehicle has been identified to be brought forward from 2027/28 to 2026/27. This removes the need to hire in an additional vehicle. The aim is to improve the reliability of the vehicle providing services to properties in narrow access areas.	2	1	2
3	CDC declared a <b>climate change emergency</b> in 2019 and is aiming for a carbon reduction of 80% by 2030 and 100% by 2045 (against a 1990 baseline)	The waste fleet contributes 43% of CDC's direct emissions. This is largely from diesel fuel use.	3	5	15	One EV is to be purchased to test the suitability of this type of vehicle in an area such as Cotswold, where a long range is required to complete all collections. The purchase of an EV allows us to test this vehicle type in all weather conditions. This requires the installation of additional EV charging infrastructure.  A fuel tank to be installed at the depot, to allow the remaining fleet to be fuelled using HVO. This is estimated to provide a 80% to 90% reduction in net CO <sub>2</sub> emissions. HVO to continue to be sourced where it continues to be environmentally practical (e.g. meets appropriate sustainability criteria), and affordable to CDC.	1	2	2
4	<b>Plastic film collections</b> need to be offered to residents from 1st April 2027 in order to maintain compliance with Simpler Recycling	Once this material is obligated under pEPR, CDC will receive additional funding to reflect the collection, handling and reprocessing of this material.  The current vehicles are not designed to collect this material type. This limits the ability to plan for the collection of plastic film.	3	5	15	Replacing the recycling vehicles is an opportunity to redesign the vehicles based on the requirement to collect plastic film. Options are extended in that we can consider both the collection of film commingled with another material, or as a separate stream, with its own compartment.	2	2	4
5	<b>Legislation changes</b> (pEPR, DRS, ETS, Simpler Recycling) will change the value, volume, and composition of waste in future years.	The current vehicles were designed before many of these initiatives were proposed. Changes in the volume and composition of waste cause some issues already e.g. requiring us to place a limit on the amount of cardboard that residents can present at the kerbside. Further changes would likely cause increased operational strain on the services, and these may in turn lead to disruption to residents.	3	5	15	Replacing the recycling vehicles is an opportunity to redesign the vehicles based on our current understanding of legislation changes. It is important to recognise however that although we have a better understanding of the changes that are being made, we have a limited understanding of what the impacts of these changes might be.	2	5	10

## Risk Response Categories

Avoid	A decision is made no to take a risk. Where the risks outweigh the possible benefits, avoid the risk by doing things differently
Accept	A decision is taken to accept the risk. Management and/or the risk owner makes an informed decision to accept that existing actions sufficiently reduce the likelihood and impact of a risk and there is no added value in doing more
Transfer	Transfer all or part of the risk to a third party e.g. contractor or partner who is better able to manage the risk
Reduce	Implement further actions to reduce the risk by minimising the likelihood of an event occurring and/or reducing the potential impact should the risk occur Further actions are recorded in the risk register and regularly monitored
Exploit	Whilst taking action to mitigate risks, a decision is made to exploit a resulting opportunity

## RISK MATRIX

Almost certain	5	10	15	20	25
Probable	4	8	12	16	20
Possible	3	6	9	12	15
Remote	2	4	6	8	10
Improbable	1	2	3	4	5
	Insignificant	Minor	Moderate	Major	Extreme
	IMPACT				

### Measures of Likelihood and Impact

#### LIKELIHOOD MEASURES

1 **Improbable** Has not occurred before  
Has not occurred at other similar organisations  
Extremely unlikely to occur (less than 10% chance) but may do so in at least 10 years' time

2 **Remote** Remote risk but could happen within next 3 to 10 years  
Has not occurred at Publica but isolated cases have occurred at other similar organisations

3 **Possible** Could happen at least once every 1 to 3 years  
New circumstances with little data to indicate likelihood of occurrence  
50 / 50 chance of it happening

4 **Probable** More likely to happen than not  
Could occur within next 3 – 12 months  
Has occurred in the last five years  
Has occurred at some other similar organisations

5 **Almost certain** Has occurred in the last two years  
Has occurred at many other similar organisations  
More than an 80% chance of it happening  
Likely to happen within next three months or is occurring at present

#### IMPACT MEASURES

1 **Insignificant** Negligible impact on achievement of service objectives/delivery  
Negligible impact on delivery of project – slight slippage or reduction in quality/scope with no overall impact  
Negligible financial impact  
Health and Safety of very small number of individuals affected  
Limited impact on staff and culture – a few individuals only affected  
Minor legal/regulatory impact – no sanction or legal action likely  
No damage to reputation or will not result in adverse media comment

2 **Minor** Moderate impact on service objectives/delivery - only partially achievable without additional time / resources  
Some impact on project – slight slippage against published milestones/targets and some 'nice to have' elements not possible  
Minor injuries possible to relatively small number of individuals  
Likely to affect motivation of small groups of staff  
Some legal/regulatory impact – could lead to warnings/threats of sanctions/ legal action  
Some public embarrassment but no damage to reputation or standing in the community  
Financial impact can be contained within service budget (>£10,000)

3 **Moderate** Service objectives/delivery not achievable without considerable additional time / resources  
Moderate effect on project timetable and significant elements of scope or functionality may not be available  
Moderate number of injuries possible – not life threatening  
Moderate impact on staff motivation within particular service(s)  
Significant legal/regulatory impact leading to reprimand, sanctions or legal action  
Some public embarrassment leading to limited reputational damage (adverse local press) – short term impact  
Financial impact cannot be contained within budget and needs additional resourcing (<£250,000).

4 **Major** Significant impact on achievement of service objectives/delivery even with additional resources (possibly leading to closure of facilities / service being withdrawn)  
Failure to meet key project deadlines or project fails to meet needs of proportion of stakeholders  
Possibility of serious injury to individuals  
Significant impact on employee motivation generally – possibly leading to poor quality service in particular service(s)  
Serious legal/regulatory impact leading to sanctions or legal action with significant consequences  
Loss of credibility and public confidence in the service / organisation (of interest to the national press)  
Significant financial impact (>£250,000)

5 **Extreme** Unable to achieve corporate objective or prolonged closure/withdrawal of service  
Major project's viability jeopardised through delay or level of quality makes it effectively unusable  
Possibility of fatalities or multiple serious injuries  
Severe impact on staff motivation generally, leading to dissatisfaction and industrial unrest  
Major legal/regulatory impact leading to sanctions or legal action with substantial financial or other consequences  
Highly damaging to reputation with immediate impact on public confidence  
Incident of interest to government agencies  
Incident potentially leading to resignation or dismissal of an Executive Director on Publica Board. Severe and unmanageable financial impact

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# Capital Fleet Replacement Program

Collection System



# Collection System

*For example...*

**H&S**

Safe vehicles, staff, service users

**Legislation**

EPR, DRS, Simpler Recycling

**Cost**

Cost reduction/ increased revenue

**Ease of Use (resident)**

containers/ service rules

**Street Scene**

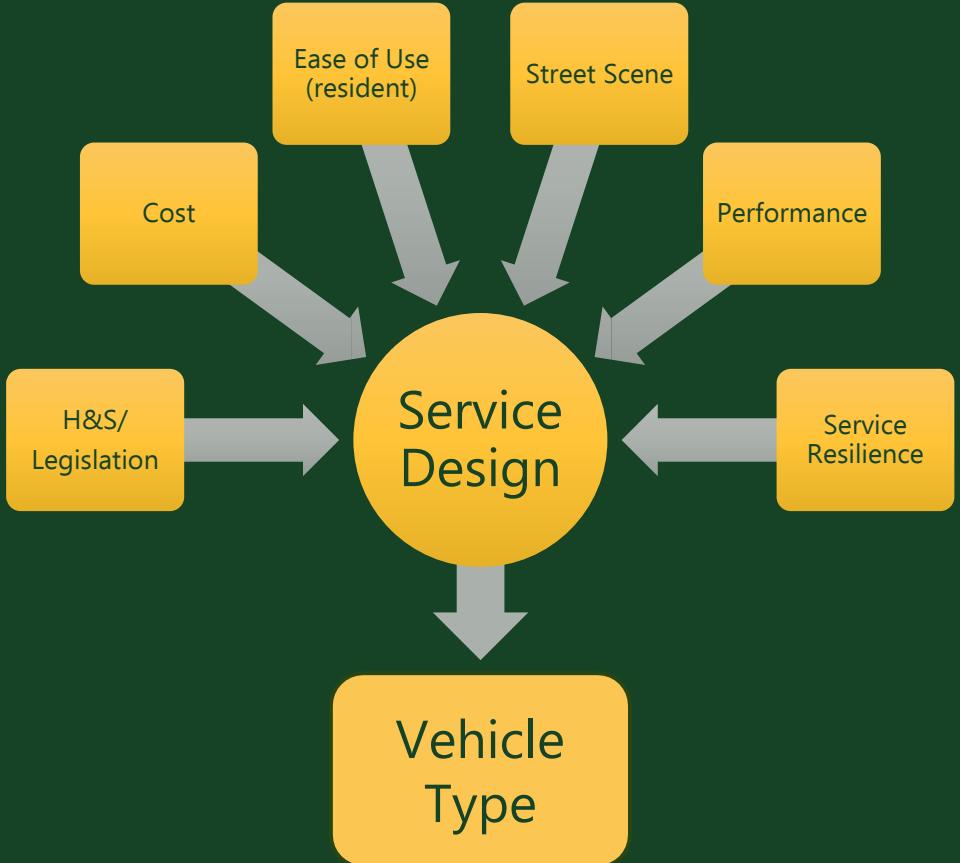
Windblown litter/ container storage

**Performance**

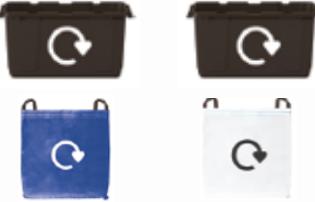
Recycling performance, productivity

**Service Resilience**

Vehicle availability, low staff churn



# Vehicles/ Containers – Currently in Use

<b>RCV</b> Refuse Collection Vehicle	<b>Stillage</b>	<b>Farid</b> 'skip on wheels'
		
Refuse Garden Waste	Dry Recycling + Food	Food Waste
		

# Chargeable Garden Waste



## Current Service

## Number of Frontline Vehicles

## Legislation Impact

## Industry Trend

## Related Impact on Vehicle Replacement

Fortnightly from 240 litre wheeled bin

6

- None
- None (service is currently optimised)
- None



# Refuse Collection



## Current Service

Fortnightly from 180 litre wheeled bin

## Number of Frontline Vehicles

7

## Legislation Impact

- Increased recycling/ reducing refuse

## Industry Trend

- Reduced frequency (three or four weekly)
- Reduced containment (140 litre bins)

## Related Impact on Vehicle Replacement

- No change to vehicle type
- Potential reduction in number of vehicles
- (increased requirement for recycling vehicles)
- (reduction in residual waste arisings/ treatment cost)



# Dry Recycling and Food



## Current Service

Fortnightly dry recycling and food (2 boxes, 2 sacks, caddy)  
Fortnightly food

## Number of Frontline Vehicles

15 x dry recycling and food  
5 x food waste

## Legislation Impact

- EPR, DRS, Simpler Recycling, ETS

## Industry Trend

Three main collection systems are in operation, with variants  
1. Commingled  
2. Twin stream  
3. Kerbside Sort (using stillage vehicles)

Wide range of factors drive system selection

## Related Impact on Vehicle Replacement

- A change in system = a change in vehicles/ routes and containers
- Commingled/ twin stream are cheaper in terms of collection, but more expensive in terms of handling/ processing materials
- **There is no one-right-way**

- All three main systems for recycling and food waste collection are in operation across Gloucestershire
- Changing the recycling and food waste collection system would incur significant mobilisation costs and may lead to service disruptions to residents
- Mobilisation costs would be incurred in areas such as resident communications and re-routing
- Additionally, in the case of twin-stream collections, significant costs would be incurred with the supply and delivery of new containers
- A decision may be made to harmonise services by the new Unitary Authority. This could require further change

## **NO CHANGE TO RECYCLING AND FOOD WASTE COLLECTION SYSTEM**

- Recycling and food waste system is not changed
- Where a change is required, it will be delivered once, following LGR
- Current understanding of legislation changes will be used to inform the design of replacement stillage vehicles



# Legislation Change

- Known/ unknowns
- We know what is happening, but not the impact
- Changes may be subject to further delays
- Used to inform sensitivity testing – number/ design of recycling vehicles

## [packaging] Extended Producer Responsibility (pEPR)

- **Live**
- Funding being provided to authorities to collect in-scope packaging (e.g. card, paper, foil, plastic tubs)
- £1.683m to CDC for 2025/26

## Simpler Recycling

- **April 2027**
- Requirement to offer plastic film collections to households (collection/ processing cost will be offset by increased EPR funding)

## Deposit Return Scheme (DRS)

- **October 2027**
- Diversion of in-scope packaging from collection systems (cans and plastic bottles)

## Emissions Trading Scheme (ETS)

- **January 2028**
- Carbon tax on fossil element of CO2 emissions from EfW

## WEEE Reform

- **Subject to consultation**
- Likely to mean funding for small and large WEEE collection

