



Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET - 20 NOVEMBER 2025
Subject	PRIVATE SECTOR HOUSING STRATEGY AND MOBILE HOMES POLICY
Wards affected	All
Accountable member	Councillor Andrea Pellegram, Cabinet Member for Environment and Regulatory Services. Email: andrea.pellegram@cotswold.gov.uk
Accountable officer	Jon Dearing, Executive Director Operations Email: jon.dearing@Cotswold.gov.uk
Report author	Philip Measures, Service Leader Environmental Protection. Email: philip.measures@cotswold.gov.uk
Summary/Purpose	To Renew the Private Sector Housing Renewal Policy and Mobile Homes Policy.
Annexes	Annex A – Private Sector Housing Strategy Annex B – Mobile Homes Policy Annex C – Equalities Impact Assessment.
Recommendation(s)	That Cabinet resolves to: <ol style="list-style-type: none">1. Approve the Private Sector Housing Strategy as set out in Annex A;2. Approve the Mobile Homes Policy as set out in Annex B;3. Approve the setting of Fees for applications for Fit and Proper Person Assessment and the annual fee for any monitoring required.
Corporate priorities	<ul style="list-style-type: none">• Delivering Good Services• Delivering Housing• Supporting Communities• Supporting the Economy



COTSWOLD
District Council

Key Decision	NO
Exempt	NO
Consultees/ Consultation	Business Manager for Housing



1. EXECUTIVE SUMMARY

- 1.1** This report introduces two policies that fall within the remit of the Private Sector Housing team. This team deals with Houses in Multiple Occupation (HMO's) and Mobile Homes site licensing and a range of other regulatory work concerned with living conditions and safety. The report updates existing policies to take into account the recent legislative changes concerning mobile homes site regulation and the significant changes to private sector housing regulation, also taking into account the Renters Rights Act 2025.
- 1.2** The policies identify the Council's priorities in line with the Council's Housing Strategy, Enforcement Policy and Long-Term Empty Homes Strategy. It sets out four commitments:
- to proactively and effectively tackle poor conditions across the private housing sector;
 - to continue to work with partners, landlords and registered providers to ensure that homes meet required standards so that residents can thrive in safe homes;
 - to support the Council's Strategy to bring long-term empty properties back into use; and,
 - to tackle unlicensed HMOs.
- 1.3** The Mobile Homes Policy deals with regulatory matters concerning the licensing and inspection of residential mobile homes sites, the appointment of Fit and Proper Persons at the licensed sites, and the setting of fees required within the regulatory regime.

2. BACKGROUND

- 2.1** The current Private Sector Housing Renewal Policy was completed in 2013 and, whilst much of its contents remain relevant, there have been some significant legislative and organisational changes since then. Administration of Disabled Facilities Grants has moved to the Customer Enabling Service, with funds allocated on a case-by-case basis within the nationally allocated budget. The Council no longer provides financial grants, but enquiries are referred to relevant services where support may be available to landlords and residents. Government from time to time, provides additional grant funding to develop initiatives such as the enforcement of Minimum Energy Efficiency Standards, which the Council took advantage of in 2022.



2.2 Changes introduced by the Housing and Planning Act 2016, which introduced a range of measures to improve standards in private sector housing, also impacted on the previous policy. This strategy ensures the regulation of private sector housing reflects the changes below:

- Civil penalties of up to £30,000 as an alternative to prosecution for certain specified offences,
- Extension of rent repayment orders to cover illegal eviction, breach of a banning order and certain other specified offences,
- Database of rogue landlords and property agents who have been convicted of certain offences or received multiple civil penalties,
- The introduction of Banning Orders for the most serious and prolific offenders under The Housing and Planning Act 2016 (Banning Order Offences) Regulations 2018.

2.3 The Council adopted a revised Civil Penalties Policy in September 2025.

2.4 The definition of licensable HMOs also changed in the 2016 Act, removing the three-storey requirement thus increasing the numbers of licensable HMOs. New legislation, the Renters Rights Act 2025, is introducing a number of additional private sector housing duties, with greater protections for tenants and prospective tenants (e.g. criminalising rental bidding) which will increase the scope and workload of the service. It is therefore important that a private sector housing strategy in place reflects these changes, to outline how the service enforces these new duties and provides support to landlords and residents. Given the new requirements of the Renters Rights Act 2025, it is recommended this strategy is reviewed and revised as necessary after one year.

2.5 The Mobile Homes Fees Policy was first introduced in 2015 to cover the fees requirements placed on licensed residential protected sites under the Mobile Homes Act 2013. The Act made provision for compliance notices to require improvements and injunctions for the most serious offences. In 2020, new requirements were brought in for such sites to appoint fit and proper persons for each site and the Council is required to administer and enforce these requirements. The new Policy accommodates these new provisions and sets out the Council's approach for its static and mobile homes responsibilities. The register of mobile home sites in the district is shown at [REGISTER OF CARAVAN SITE LICENCES ALL TYPES](#)



- 2.6** In light of the changes under the Renters Rights Act 2025, it is proposed to review the Private Sector Housing Strategy within the next year and thereafter every three years. The Mobile Homes Policy has a default three-year review period.

3. ALTERNATIVE OPTIONS

- 3.1** The Council may approve, amend, or reject the proposed policies as they see fit.

4. FINANCIAL IMPLICATIONS

- 4.1** The approval of the Private Sector Housing Strategy has no direct financial implications. However, the new statutory requirements in the Renters Rights Act 2025 do have financial implications. Additional officer resources will be necessary to meet these obligations and will be considered as part of the 2026/27 budget setting cycle. The current proposal under consideration includes the recruitment of one additional Private Sector Housing Officer (career grade) and one Tenancy Relations Officer. As these roles will be employed by Publica, they will operate as shared officers working across the partnership. Consequently, the associated costs will also be shared and reflected in the Council's 2026/27 budget and Medium-term financial strategy, subject to the approval of the business case. If approved by all three Councils, it is suggested the costs of the Tenancy Relations Officer post would be split evenly during 2026/2027.
- 4.2** Although additional government funding is likely to be provided to support the implementation of the new legislation, this has not yet been confirmed. Future funding is expected to come mainly from civil penalties.
- 4.3** If the Cabinet endorse the approach on the initial allocation of costs for any approved additional resources, this will be used as a basis for Publica submitting its contract sum change in respect of this additional resource. One aspect of the review of the Private Sector Housing Strategy will focus on the allocation of costs for resources based on actual data from the initial period of operation. This will be reflected next year in the 2027/2028 budget making process.

5. LEGAL IMPLICATIONS

- 5.1** The Private Sector Housing Strategy and the Mobile Homes Policy set out how the Council intends to meet its duties particularly with regard to its regulatory, inspection and licensing responsibilities under the legislation referred to in the policies. In



addition, there are legal requirements to have such policies in place in order to carry out certain functions, such as the charging of fees for the inspection of residential mobile homes sites. Therefore, without these policies in place, the Council could be open to legal challenge or lose the ability to make lawful charges.

6. RISK ASSESSMENT

- 6.1** An up-to-date Private Sector Housing Strategy underpins and supports the Councils work in this area. The Council would be unable to set fees if it did not have a current fees policy in place.

7. EQUALITIES IMPACT

- 7.1** Provided in Annex C

8. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

- 8.1** A Sustainability Impact Assessment has been submitted for this report.

9. BACKGROUND PAPERS

- 9.1.** None.

(END)