Cheltenham Borough Council Cabinet

Meeting date: **Tuesday, 18 November 2025**

Meeting time: **6.00 pm**

Meeting venue: **Council Chamber - Municipal Offices**

Membership:

Councillors Victoria Atherstone, Paul Baker, Flo Clucas, Mike Collins, Rowena Hay, Peter Jeffries, Alisha Lewis, Izaac Tailford and Richard Pineger

---

Important notice – filming, recording and broadcasting of Council meetings

This meeting will be recorded by the council for live broadcast online at www.cheltenham.gov.uk and www.youtube.com/@cheltenhambc/streams
The Chair will confirm this at the start of the meeting.

If you make a representation to the meeting, you will be deemed to have consented to be filmed and to the possible use of those images and sound recordings for broadcasting and/or training purposes.

If you have any questions on the issue of filming/recording of meetings, please contact Democratic Services.

Contact: democraticservices@cheltenham.gov.uk
Phone: 01242 264 246

CHELTENHAM
BOROUGH COUNCIL

SECTION 1 : PROCEDURAL MATTERS

1 Apologies

2 Declarations of interest

3 Minutes of the last meeting (Pages 5 - 16)
Minutes of the meeting held on 21 October 2025

4 Public and Member Questions and Petitions
Questions must be received no later than 12 noon on the seventh working day before the date of the meeting

SECTION 2 :THE COUNCIL
There are no matters referred to the Cabinet by the Council on this occasion

SECTION 3 : OVERVIEW AND SCRUTINY COMMITTEE
There are no matters referred to the Cabinet by the Overview and Scrutiny Committee on this occasion

SECTION 4 : OTHER COMMITTEES
There are no matters referred to the Cabinet by other Committees on this occasion

SECTION 5 : REPORTS FROM CABINET MEMBERS AND/OR OFFICERS

5 Local Government Reorganisation - Business Case Submission (Pages 17 - 870)
Report of the Leader, Councillor Rowena Hay

6 Award of rent support grant to voluntary sector organisation (Pages 871 - 888)
Report of Cabinet Member for Finance and Assets, Councillor Peter Jeffries

7 Updated Safeguarding Policy (Pages 889 - 940)
Report of Cabinet Member for Safety and Communities, Councillor Victoria Atherstone

8 Community Infrastructure Levy (CIL) Joint Committee Host Authority and Terms of Reference Review (Pages 941 - 964)
Report of the Leader, Councillor Rowena Hay

CHELTENHAM
BOROUGH COUNCIL

9 Notification of decisions made by the Community Infrastructure Levy (CIL) Joint Committee (Pages 965 - 976)
Report of the Leader, Councillor Rowena Hay

10 Review of Statement of Licensing Policy (Licensing Act 2003) (Pages 977 - 1060)
Report of Cabinet Member for Safety and Communities, Councillor Victoria Atherstone

11 Review of Taxi and Private Hire Licensing Policy (Emissions Policy) (Pages 1061 - 1086)
Report of Cabinet Member for Safety and Communities, Councillor Victoria Atherstone

12 Corporate Enforcement Policy (Pages 1087 - 1118)
Report of the Leader of the Council, Councillor Rowena Hay

13 To adopt the Statement of Community Involvement (SCI) 2025 (Pages 1119 - 1146)
Report of Cabinet Member for Planning and Building Control, Councillor Mike Collins

14 Local Council Tax Support Scheme 2026-27 (Pages 1147 - 1262)
Report of Cabinet Member for Finance and Assets, Councillor Peter Jeffries

SECTION 6 : BRIEFING SESSION

- Leader and Cabinet Members

15 Briefing from Cabinet Members

SECTION 7 : DECISIONS OF CABINET MEMBERS

Member decisions taken since the last Cabinet meeting

SECTION 8 : ANY OTHER ITEM(S) THAT THE LEADER DETERMINES TO BE URGENT AND REQUIRES A DECISION

This page is intentionally left blank

CHELTENHAM
BOROUGH COUNCIL

Cheltenham Borough Council
Cabinet
Minutes

Meeting date: **21 October 2025**

Meeting time: **6.00 pm - 7.10 pm**

In attendance:

Councillors:

Victoria Atherstone, Paul Baker, Flo Clucas, Rowena Hay, Peter Jeffries, Alisha Lewis, Izaac Tailford and Richard Pineger

Also in attendance:

Gareth Edmundson (Chief Executive), Tracey Birkinshaw (Director of Planning and Building Control), Abi Marshall (Development Manager, Major Developments and Regeneration) and Helen Mole (Head of Economic Development, Comms and Marketing)

---

1 Apologies

Apologies were received from Councillor Collins.

2 Declarations of interest

There were none.

3 Minutes of the last meeting

The minutes of the meeting held on 16 September were approved as a true record and signed accordingly.

4 Public and Member Questions and Petitions

No Member questions and no petitions had been received. There was one public question:

Question from Gary Clarke to Cabinet Member for Housing and Customer Services, Councillor Flo Clucas

Can the Cabinet Member confirm, with reference to any existing records or policies from 01 January 2020 to the present, whether there are any plans or intentions to package, transfer, or sell any part of the council's housing stock, including the approximately 4,800 properties managed by Cheltenham Borough Homes, to pension funds, private equity firms, or other third parties? If no such plans exist, will the Cabinet commit to issuing a formal, public declaration within 30 days, confirming that this housing stock will remain under the council's direct ownership, control and management, with no such proposals under consideration? If such plans do exist, what are the specific details of these proposals, including when they were last discussed, and how do they align with the council's duties under the Housing Act 1985 to manage its housing stock for public benefit?

Cabinet Member response:

Thank you for your question. The council has no plans to package, transfer, or sell the council's housing stock. As part of our ongoing approach to strategic asset management there may be occasions when individual properties or types of properties are considered for disposal, for example those where it would not be financially viable to carry out work to meet the decent homes standards. In such cases disposal may be used with any proceeds being re-investment through the Housing Revenue Account.

The questioner was not present to ask a supplementary question.

5 Award of rent support grant to voluntary sector

The Cabinet Member for Finance and Assets introduced the report, saying that these grants help the council to support community and charity groups which play an important role in making Cheltenham a better place to live. They encourage groups to become more independent and less reliant on council funding, and in order the qualify for a grant they must show that they are working in line with council's corporate priorities.

He said the report details an application from Leckhampton Rovers Football Club, a registered charity, which maintains the fields, sports pitches, pavilion and café, and makes a strong case of evidence for their contribution to all the corporate priorities, in particular enhancing the environment and building a safe and strong community. They have over 600 members, 49 youth teams, and strong community links, and the council is happy to work collaboratively to support them.

There were no Member questions.

The Cabinet Member for Safety and Communities was really pleased to note that even in these difficult financial times, when balancing the budget and making sure there is enough money to go round is so challenging, the council is still able to support the important voluntary and community sector, helping them to continue doing such great work in communities they serve.

The Cabinet Member for Economic Development, Culture, Wellbeing and Public Realm was also very supportive of this award, saying that his experience in helping to plant trees round the borders of Burrows Field, together with the county council and CBC's greenspace team, had shown him how Leckhampton Rovers are working with the council on our corporate priorities and the environment, as well as providing an incredible amount of sporting opportunity for many teams of all ages. He congratulated everyone involved for the great job they are doing.

The Leader said the 2016 decision to make grants like this available is one we should be very proud of – these organisations look after our buildings as well as delivering services the council cannot, and they wouldn't be able to do this if they were charged market rents. Our communities would be poorer and weaker without the facilities and services they provide.

The Cabinet Member for Waste and Recycling, Parks, Gardens and Green Open Space also recognised the massive input to the town from Friends Groups, and from local football clubs who provide so much opportunity for children of all ages and abilities. Leckhampton Rovers has taken on a huge project at Burrows Field, with grants from the Football Association and others to improve their pitches and facilities. It is good that we can support them, and that we continue to support all voluntary organisations as much as possible.

The Cabinet Member for Finance and Assets welcomed and agreed with all Members' comments, saying this is one of those policies which is more about the outcomes than the money.

RESOLVED (unanimously) THAT:

1. **the following rent support grant is agreed:**
   <u>Applicant</u>: Leckhampton Rovers Football Club, Burrows Fields and Pavilion
   <u>Recommended rent support grant</u>: A rent support grant of 62% of current market rent, applied to the portion of rent which is not recouped through subletting to the café on site.

2. **authority is delegated to the Participation and Engagement Team Leader, in consultation with One Legal to agree the terms of a rent support grant agreement with the applicant.**

6 Nature Recovery Supplementary Planning Document (SPD)

The Leader read an introduction to the report on behalf of the Cabinet Member for Planning and Building Control:

> *It is my pleasure to present this consultation document. If cabinet agree to its publication tonight, it will signal the beginning of a four-week public consultation exercise, which will go live as soon as possible.*

This is a new draft nature recovery supplementary planning document (SPD) and it will give the public the opportunity to play a part in this vitally important process. The guidance sets out how future development in Cheltenham can support and improve the natural environment.

Cheltenham already has a wide range of green spaces, including nature reserves, parks, and important wildlife areas. This SPD offers guidance on how new buildings and developments can help connect and improve local green spaces, wildlife habitats, and the overall health of nature in Cheltenham.

Residents, developers, and community groups can now share their views on the draft SPD, which launches on 7 November 2025 and runs until 7 December. The consultation will be available on the council's website.

This draft guidance sets out how we can build in a way that supports wildlife, protects green spaces, and help nature thrive across Cheltenham. We're keen to hear from residents, developers and community groups so we can shape a final document that works for everyone and makes a real difference. Hopefully, it really will be a win-win opportunity for us all.

This work supports the policies in our development plan and links to the emerging Gloucestershire local nature recovery strategy which identifies the best places to restore nature and the most important actions to take.

Hopefully, cabinet colleagues will be able to support both the recommendations contained in this consultation document.

I am sure that you have all been able to read it in full. However, I just wanted to say that it is fully in line with our corporate plan priorities, and aligns with the following actions:

- *We will drive increased biodiversity in our borough and fully utilise our planning system to encourage developers to enhance our natural environment, mitigating the impact of new buildings.*
- *We will fulfil our biodiversity net gain (BNG) obligations within the planning system.*

In addition, I think that it is important to draw out these important points which are contained within the document.

Nature recovery refers to the process of restoring and revitalising ecosystems that have been degraded or lost due to human activity, climate change, or other factors. It involves regenerating natural habitats, creating new ones as well as protecting them (and the species they support) from degradation. The goal is to create healthier, more resilient environments that can support a wider variety of species on a large scale. Nature recovery is important for a number of reasons, as set out in the SPD, including:

1. Biodiversity Conservation

2. *Climate Change Mitigation*
3. *Ecosystem Services*
4. *Resilience to Natural Disasters*
5. *Human Well-Being*
6. *Sustainability*

As I said at the beginning, I hope that you will all be able to support the introduction of this important public consultation document

The Leader said she hoped that Members would be supportive, and stressed that the recommendation concerns the consultation process, not the definitive document.

The Cabinet Member for Climate Emergency said he had read the whole document and echoed the sentiments of the introduction. He noted that the climate impact assessment includes the sentence that '*research suggests that 10% biodiversity net gain is a minimum to prevent further decrease*' and felt that this should be included and highlighted as part of the introduction when going out to consultation, to ensure that developers fully understand their obligations.

The Director of Community and Economic Development could see no problem with adding some more positive wording around this, and was happy to discuss the suggestion with the report author.

The Cabinet Member for Safety and Communities wondered if there is potential scope to identify areas for habitat banks within the borough boundary, where developers can be directed should they need to choose that as their option for biodiversity net gain. The Director of Community and Economic Development welcomed this interesting question, saying the council has previously investigated whether Cheltenham landholdings could be utilised as potential habitat banks, but the challenge with this is that responsibilities are very long term, and the implications around administration and monitoring are significant. She said the council will always consider local first, and is already looking at potential habitat banks with Gloucestershire Local Nature Partnership. The government allows credits to be allocated at a more national level, which would transport any benefit elsewhere, still local if possible but not necessarily within the borough itself.

The Cabinet Member for Climate Emergency added to his previous comment, which he was concerned may have appeared overly negative. He said the proposals are very positive compared with what has gone before, and with the Parks and Public Realm team and Ubico are doing all they can to encourage biodiversity and nature, this is a good step forward. He was just concerned that developers need to understand that adding 10% is a minimum to ensure neutrality.

The Cabinet Member for Waste, Recycling, Parks, Gardens and Public Greenspace said he is really proud of the work the council does, and that the Climate Emergency SPD a few years ago was a very positive document, well received across the whole sector, helping to concentrate and focus the minds of planners, applicants and developers, as well as helping members of Planning Committee with their decisions. He said huge credit is due to the Director of Community and Economic Development

and her team – this document is not a legal requirement, but will help ensure more applications are positively received. He hoped the consultation would go as wide as possible, and was pleased to see CBC leading the way once more.

The Cabinet Member for Safety and Communities agreed, and was looking forward to the consultation responses and future benefits of this SPD. She said it was worrying to read about endangered and already extinct species, and welcomed the move towards implementing biodiversity net gain and improving nature and natural habitat.

RESOLVED THAT:

1. **the draft Nature Recovery Supplementary Planning Document (Appendix 4) is approved for consultation for a period of 4 weeks under Regulation 12 of the Town and Country Planning (Local Planning)(England) Regulations 2012 (as amended).**

2. **authority is delegated to the Director of Community and Economic Development, in consultation with the Cabinet Member for Planning and Building Control to make any necessary minor amendments, corrections and additions to the document prior to publication for consultation**.

7 Budget Strategy, Process and Timetable 2026-27

The Cabinet Member for Finance and Assets was pleased to present the report which outlines the strategic approach and key milestones for the development of the council's budget and council tax proposals, reaffirming its commitment to financial sustainability and giving corporate priorities meaningful public engagement. The report notes the current forecast overspend of £295k for 2025-26, underlining the need to continue identifying savings and efficiencies while protecting frontline services. It also sets out the risks of relying too heavily on reserves to balance the budget.

He said that the report reflects the provisional local government financial settlement expected in late December, with final confirmation likely in January next year. This will influence the shaping of the final budget proposals. Sadly the government always leaves decisions and announcements far too late, but have to indicate three-year settlement which will hopefully be followed through.

In conclusion, he said that the success of the budget depends on strong collaboration of Cabinet colleagues and officers across the council, and encouraged all colleagues to engage early with the timetable and contribute ideas and feedback within their individual portfolios, as we all work together to present a balanced and resilient budget for Cheltenham.

There were no questions or comments.

The Leader reminded Members that this report is legally required and presented at the same time every year.

RESOLVED (unanimously) THAT:

3. **the budget setting timetable at Appendix 2 and outlined in section 3 of this report is approved;**

4. **the outline budget strategy outlined in section 4 is approved;**

5. **the £295k overspend reported to Cabinet in September 2025 and the large amount of work which will be required to close this gap and deliver the required savings and efficiencies in 2025/26 is noted;**

6. **the intention for this council to remain working together with the Gloucestershire Business Rates Pool in 2026-27 as outlined in section 7 if applicable is noted;**

7. **the Section 151 Officer, Deputy Section 151 Officer and the Cabinet Member for Finance and Assets are requested to consider suggestions from the Budget Scrutiny Working Group in preparing the interim budget proposals for 2026-27.**

8 Briefing from Cabinet Members

The Leader invited Members to share their briefings on events and progress since the last meeting.

The Cabinet Member for Major Developments and Housing Delivery:

- thanked CyNam for their generous invitation to a networking event before Nick Clegg's talk at the recent Literature Festival. It was good to speak with small and medium-sized enterprises (SMEs), start-ups, and people in the tech industry who are already established locally or thinking of moving to Cheltenham. People are excited by the Golden Valley proposals, and really see opportunities to build in Cheltenham. She is grateful to CyNam for making this happen;
- it is fantastic that ten new homes are fully finished at Regents Village, and will be ready to be moved into by Christmas. She praised the speed and quality of the homes, with solar panels, EV charging, ground source heat pumps, and important accessibility features such as level access and wider corridors and doors. This is a great investment and she looked forward to welcoming the new residents;
- the Swindon Road development is also progressing, with residents getting a second newsletter soon to keep them updated, and she looked forward to attending the ground-breaking at that site soon.

The Cabinet Member for Safety and Communities said that she had also attended an inspiring event at the Literature Festival, at which the No Child Left Behind (NCLB) Team, together with their partners (the Children's Society, The Rock, and Springbank Community Resource Centre) talked about the work they have done this year as part

of a Youth Voice activity, giving young people a voice. She was proud of the young people who were brave enough to stand up and speak about some tough subjects, including online bullying and harm in schools, and thanked NCLB for inviting her to their workshop where she made a bracelet.

The Cabinet Member for Economic Development, Culture, Wellbeing and Public Realm had had a busy month:

- he attended the launch of the Everyman's Grove Street Appeal, which hopes to raise £1m for a creative arts and educational community centre, to open in Spring 2026. This will offer outreach activities in an excellent location, and provide an accessible way into the arts;
- he spoke at the launch of The Wilson's new free exhibition, *Material Worlds*, which together with the Hayward Gallery is displaying art created from everyday articles. The exhibition is proof that Cheltenham punches above its weight in the world of culture and arts, and is a real testament to the work of Lisa Edgar and her team;
- the Lions At Large trail has now ended; it increased footfall in Cheltenham and Gloucester, thus supporting local businesses, and sale of the lions raised £370k for the Big Space Cancer Appeal. Thanks to Cheltenham BID and Visit Cheltenham for supporting the project, and helping Cheltenham and Gloucester Hospitals;
- he attended a Marketing Cheltenham meeting at Whaddon Road, where local businesses got together to share insight, and included a showcase of the new Visit Cheltenham website, which is now the top search result when looking for events in Cheltenham;
- the Literature Festival was a great success, with over 400 events; festivals are essential to our town, and the continued success of the literature festival is to be celebrated;
- outside culture, he attended a meeting with Gloucestershire County Council last week, to discuss the High Street and the Promenade. It is important to work together to ensure a better future and vision for Cheltenham, to bring in different organisations to consult and improve the town centre and public realm and get things back on track;
- he encouraged businesses to support the BID ballot – BID does a lot of good work in the town, and will hopefully continue to do so in the future;
- and finally, with Christmas fast approaching, the Everyman and Playhouse theatres will both be presenting pantomimes, and the ice rink in Imperial Gardens will return on 21 November.

The Cabinet Member for Housing and Customer Services reported on the following:

- Cheltenham's Citizen of Honour David Bath is in the process of collecting selection boxes and funding for deprived children in Cheltenham. Last year, he collected just under 900 and is already well on the way to that this year. She thanked Dave for all his hard work;
- work on the St Peters and Moors Hub starts with ground analysis on 02 November, and it is anticipated that the new premises will be complete by April 2026;
- she has been talking about housing for veterans and how the council can help, with a meeting to take place tomorrow; thanks to Councillor Harvey for his interest and involvement in this;
- she attended an interesting meeting 10 days ago, where representatives from European cities met to discuss housing across Europe; all are facing similar problems - not enough, too expensive, insufficient funding to build, compliance with green agendas. She has been asked the join a task group to consider these issues, which could be extremely useful, particularly as it has been suggested that investment and other international banks will be asked what they can do to help;
- she has also attended a conference in Leeds with the Housing Ombudsman, who is responsible for local authority and social housing complaints. One question concerned private sector tenants' complaints which the Ombudsman said would continue to come to local authorities

until secondary legislation goes through – until then we are working in the dark. The Ombudsman also went through the complaints process, providing those present with the opportunity to see how it works, hear what they think is good and on what we need to concentrate. When reports come in, they want us to challenge, to make sure everything is being done properly, and it was great to be able to say that is the norm in Cheltenham where tenants, leaseholders and Members have the right and the opportunity to ask questions and receive responses.

The Cabinet Member for Waste, Recycling, Parks, Gardens and Public Greenspace shared the following:

- he and the Cabinet Member for Planning and Building Control attended a briefing with officers about the new Cheltenham Trees Strategy, which will be out for consultation soon. This is a brilliant piece of work, setting out how the council will manage and protect its thousands of trees, including many TPO'd and veteran trees, as well as a strategy for new planting. Cheltenham is regarded as a 'town within a park' but some parts of the borough are devoid of trees and canopy, particularly on the west side. This document really looks to how this imbalance can be addressed. Trees are a valuable commodity for many reasons: improving people's mental health, providing shade, increasing biodiversity and much more;
- another evolving policy concerns Suitable Alternative Natural Greenspace (SANGs), which will require planning applicants to make a contribution, in an attempt to generate alternative areas the Cotswold Beechwoods. Money from planning applications will be used to make areas of Cheltenham more attractive, and this is a good opportunity to invest in our parks;
- regarding recycling, the council continues to work towards expanding kerbside recycling, to include flexi-plastic and tetra packs, hopefully to be rolled out in the new year, once one or two issues have been finalised;
- conversations continue in positive way with Gloucestershire County Council about the future of the Household Recycling Centre – this is not altogether straightforward but there are some common goals .

The Cabinet Member for Climate Emergency reported on the following items:

- he recently attended a Climate Leadership Gloucestershire meeting, which take place six times a year, to review the climate risk and vulnerability assessment. Comments raised provide evidence for further action on the climate. This should be ready in the next few months, and made quite scary reading. Also discussed was the Local Area Energy Plan, which plans how the electricity grid is going to be managed now that we have the new organisation, Great British Energy, and how electricity will get to businesses and houses up until 2040-50. Documents on this will be shared soon, and today a business summit is being held – the first collaboration with all our business partners - and it will be interesting to hear how this went;
- we are recruiting a new resident engagement officer, but until then he is still attending events to discuss low carbon technologies. He spoke at an Energy Smart event on 04 October, set up by our partner Furbnow, for home-owners who can pay for their own retrofitting. It was very positive and attended by 70 people;
- we are just finishing the Social Housing Decarbonisation Fund Wave 2.1, for insulating Council housing, and have signed grant funding for Wave 3, which will provide £3.1m towards bringing all housing stock to EPC C or better;
- he recently toured Prestbury and Warden Hill, looking at SuDs and other flood prevention schemes, and considering where these could be placed to help with localised flooding in his own ward, St Mark's. He added that the council is always looking for volunteer flood wardens, and

said the Emergency Planning Team has received some funding for flood protection equipment, which will allow it to make better preparation to help residents during flood events;
- finally, he reported that volunteers have cleared 4km of Himalayan Balsam from the River Chelt, and as a result their hard work we are beginning to see lasting results and can think that the river might eventually be free of it altogether.

The Cabinet Member for Finance and Assets said his was a difficult portfolio to brief on, as most of it concerned confidential matters. He therefore had nothing to add.

The Leader shared the following:

- earlier today she met with the treasurer of Whaddon United Football Club, who has taken on the lease at the resource centre in Clyde Crescent. The club has existed since the 1970s but never had its own clubhouse, so is very excited to have the opportunity now and will be applying for a rent support grant to help finance it. Some of the club's pitches are not brilliant, but now they have a club house and three teams, they can apply to the Football Association for funding and help to improve the pitch quality. She is delighted that the council is helping to make this happen;
- on Saturday she attended a concert at the Pittville Pump Room, to mark the 50th anniversary of the Oriel Singers. This group raises a lot of money for local communities, and inspires composers to write music especially for it, including a jubilee piece composed for the occasion;
- she was asked to give a closing speech at Tech Cyber Week, and was pleased to note the growth of CyNam over the last two years, from a relatively small, Cheltenham-focussed organisation to one of 7,000 members and a reach and network far beyond Cheltenham. Huge congratulations to Holly Wakefield and the team for making this happen – it was great to see such a well-attended event, and to hear what opportunities are coming forward in the cyber tech and security world;
- the Cheltenham BID renewal ballot is coming to an end, and she encouraged any businesses who have not yet voted to do so. She said the council couldn't do much of what it does without BID, and offered massive thanks to the entire BID board – all of whom are volunteers and most of whom run a local business and care passionately the town and its business. A networking event at The Bottle of Sauce was well attended, and BID has decided to extend its area, bringing in new people and small businesses.

9 Cabinet Member Decisions taken since the last meeting

Members reported on the following decisions:

1. **23 September 2025:** Cabinet Member for Housing and Customer Services, Councillor Flo Clucas
   To award a contract to Afghanistan and Central Asian Association (A&CAA)
   WITHDRAWN

2. **18 September 2025:** Cabinet Member for Safety and Communities, Councillor Victoria Atherstone
   To note the legislative update and approve the proposed fee for primate licence applications

3. **03 October 2025:** Leader, Councillor Rowena Hay
   Nominations to Outside Bodies

4. **24 September 2025:** Cabinet Member for Planning and Building Control, Councillor Mike Collins
   To agree to enter into a contract with recruitment consultancy Carrington West for the supply of services of a shared planning policy manager (covering Cheltenham, Gloucester and Tewkesbury) for up to a period of 12 months

5. **13 October 2025:** Cabinet Member for Safety and Communities, Councillor Victoria Atherstone
   To adopt the Gloucestershire Tackling Domestic Abuse Strategy 2025-28

10 Local Government Act 1972 - Exempt Business

RESOLVED THAT:

- **in accordance with Section 100A(4) Local Government Act 1972 the public be excluded from the meeting for the remaining agenda items as it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public are present there will be disclosed to them exempt information as defined in paragraph 3, Part (1) Schedule (12A) Local Government Act 1972, namely:**

  Paragraph 3: Information relating to the financial or business affairs of any particular person (including the authority holding that information)

11 To dispose of the Municipal Offices

RESOLVED THAT:

1. **the sale of the Municipal Offices to the preferred bidder be approved**

2. **the Leader or Deputy Leader, in conjunction with the Deputy Chief Executive (Section 151 officer), is authorised to:**

   - **conclude negotiations regarding the Heads of Terms;**

- **enter into an Exclusivity Period which allows for investment in the due diligence process by the preferred bidders;**
- **instruct solicitors to prepare the sales contract on terms set out in the Heads of Terms;**
- **subject to successfully passing gate reviews, enter into a formal sales agreement for the disposal (drafted by solicitors in accordance with Heads of Terms)**

Cheltenham Borough Council

Cabinet 18 November 2025

Local Government Reorganisation – Business Case Submission

Accountable member:

Councillor Rowena Hay, Leader

Accountable officer:

Gareth Edmundson, Chief Executive

Ward(s) affected:

All

Key Decision: No

Executive summary:

In February 2025, the Government invited all two-tier local authority areas to bring forward Local Government Reorganisation (LGR) proposals. This letter followed the intention of Government, as set out in the English Devolution White Paper in December 2024, to replace the “two-tier system of local government” (district/borough councils and county councils) with a “a single tier” of local government serving an area through a “unitary council”.

The Government requested interim proposals by 21 March 2025 with final submissions by 28 November 2025. There are now three LGR proposals being put forward by Gloucestershire councils:

- Option 1: A single county-wide unitary authority (1UA) covering the whole county of Gloucestershire (population size c.660,000). Developed jointly by all councils in Gloucestershire.

- Option 2: Two east/west unitary authorities (2UA-EW) for the county, aligning with the district council boundaries in the east of the county (Cheltenham, Cotswold and Tewkesbury, population c.311,000) and the west of the county (Gloucester, Forest of Dean and Stroud, population c.349,000). Developed by all councils in Gloucestershire
- Option 3: A unitary for Gloucester and a unitary for the remainder of Gloucestershire (2UA-GG). This is comprised of a Greater Gloucester Council (an expanded footprint of the existing Gloucester City Council population c. 179,000) and a Gloucestershire Council (amalgamation of the remainder of the surrounding councils with a projected population of c.470,000). This proposal has been developed solely by Gloucester City Council.

It is ultimately a decision for Government which option for LGR is taken forward, based on assessment of the proposals against the following criteria:

- Be the right size to achieve efficiencies, improve capacity and withstand financial shocks (min population 500k).
- Prioritise the delivery of high quality and sustainable public services.
- Meet local needs and be informed by local views.
- Support devolution arrangements.
- Enable stronger community engagement and neighbourhood empowerment.

Cheltenham Borough Council (CBC) is committed to working together with all councils to deliver whichever option is selected by Government to be implemented. In addition, CBC has worked together with all other Gloucestershire councils to develop the 1UA and 2UA-EW found in appendix 3 and 4. However, previously at the interim proposal stage, CBC developed its own submission for an east/west two unitary model that was supported by full Council.

Under this mandate, the council has developed a further policy statement for review by full Council that sets out why a two unitary, east/west split is right for both Cheltenham and Gloucestershire. It explains why, having reviewed the evidence and local context, the east/west two unitary model is the stronger long-term option for Gloucestershire.

The accompanying document, Stronger Places, Stronger Gloucestershire: the case for East and West Gloucestershire. One County, Two Unitary Councils (appendix 6) summarises the strategic, financial and democratic rationale for this preference. It draws on the technical analysis in the business cases while placing greater emphasis on the factors that will ultimately determine success: public trust, place identity, economic specialisation and sustainable scale.

This is not a formal submission to Government, but a policy statement that will inform Cheltenham’s contribution to Government’s consultation on the options. It is intended to provide clarity on the council’s reasoning, to support constructive dialogue with

partners across Gloucestershire, and to ensure Cheltenham's voice is clear as options for reform are considered.

The council's view is that, if reform proceeds, two unitary authorities would:

- Reflect Gloucestershire's dual centres of economic gravity – Gloucester's clean-energy and sustainable-industry strengths and Cheltenham's leadership in cyber, technology and innovation.
- Offer the right scale for capability and connection, and
- Create councils that are trusted, agile and locally accountable, designed to endure for the next 50 years rather than focused on short term savings.

Recommendations:

That Cabinet:

1. Notes the completed final business cases and supporting documentation relating to:
    a. a single unitary for Gloucestershire, appendix 3
    b. a two unitary East and West Gloucestershire appendix 4
    c. a two unitary Greater Gloucester/Gloucestershire appendix 5
    d. stronger places, stronger Gloucestershire – the case for East and West Gloucestershire, appendix 6

2. Decides to support one of the following Local Government Reorganisation Business Cases as part of the submission to the Ministry of Housing, Communities and Local Government (MHCLG):
    a. A single unitary for Gloucestershire as detailed in the business case in appendix 3
    b. A two unitary, East and West Gloucestershire as detailed in the business case in appendix 4
    c. A two unitary, Greater Gloucester and Gloucestershire as detailed in the business case in appendix 5
3. Delegates responsibility to the Leader of the Council, in consultation with the Chief Executive, to finalise and agree the joint letter and submission, alongside other Gloucestershire Councils and submit to MHCLG on or before the November 28 2025 deadline.

---

1. Implications

1.1 Financial, Property and Asset implications

The business cases attached in appendices 3-5 set out the projected "day 1" positions of each of the proposed options for LGR. In addition, the business cases

set out the estimated savings that could be delivered from each of the business cases. However, all business cases are based on assumptions and estimates and aim to support and inform decision making relating to LGR.

While there are no immediate financial implications that relate to the decision and submission of the LGR business cases, it expected that there will be significant future costs if the Government continues on the current timeline to implement unitarisation by May 2028.

The costs of implementation are not fully understood at this point but will likely involve backfilling vacancies with interim capacity as employees are utilised to implement the LGR programme, as well as significant costs associated to transformation. The amount of transformation that takes place, for example, investment in new systems, ahead of vesting day of the new local authority(ies) remains unknown but provision will need to be made and correlate to the extent of harmonisation and integration councils want to achieve ahead of May 2028.

Initial estimates suggest a figure of up to £2m in costs may be realistic over the medium term to support LGR. Consideration of this will be made as part of the budget setting process.

Signed off by: Jon Whitlock, Deputy 151 Officer

1.2 Legal implications

The legal process and implications are contained within the body of the report.

The Secretary of State for Housing, Communities and Local Government has powers under Part 1 of the Local Government and Public Involvement in Health Act 2007 to invite areas to submit proposals for LGR. The Secretary of State has exercised those powers in his letter to various authorities dated 5 February 2025 and included within the March Cabinet Report.

The final decision on any unitary structure for Gloucestershire will rest with the government and legislation will be implemented to facilitate any changes.

The projected timescale for LGR implementation can be found in section two of the report. Any changes resulting from LGR will have a significant impact and will be the subject of detailed legal support and advice going forward.

Signed off by: One Legal – legalservices@onelegal.org.uk

1.3 Environmental and climate change implications

There are no environmental considerations at this stage, but full assessment of environmental implications will need to be considered as LGR progresses.

Signed off by: Richard King – Head of Construction

1.4 Corporate Plan Priorities

Not applicable at this stage as the Government's preferred LGR option is yet to be selected, so an assessment can only be made once a decision has been made on the future shape of local government.

However, work is being undertaken with partner councils to scope each council's key corporate plan priorities so they can be considered as part of the LGR transformation process.

1.5 Equality, Diversity and Inclusion Implications

See appendix 2.

---

2 Background

2.1 On 5 February 2025, the Minister of State for Local Government and English Devolution, wrote to all Gloucestershire Leaders inviting them to bring forward proposals for LGR. Reorganisation would abolish existing county and district councils and create new unitary authorities covering the same geography, aligning with the national English Devolution White Paper ambitions published in December 2024. The minister confirmed the timeline as follows:

- The deadline for the submission of interim proposals as 21 March 2025
- The deadline for the submission of full proposals as 28 November 2025

2.2 In a joint response to the minster submitted on 21 March 2025 Gloucestershire councils outlined three options for reorganisation being considered. These were

- A single unitary for the whole county
- Two unitary councils, one comprising of the districts of the Forest of Dean, Gloucester and Stroud in the west and the districts of Cheltenham, Cotswolds and Tewkesbury in the east.
- A city based unitary comprising of a 'Greater Gloucester' with the remaining footprint of the county forming the other unitary council.

2.3 The letter also attached two appendices these were:

- An options appraisal of a single county unitary and the east/west unitary commissioned by Gloucestershire County Council (GCC).
- An east/west two unitary interim proposal commissioned by CBC.

2.4 The Government has indicated that assessment of proposals will be against

criteria that test whether new structures:

- Be the right size to achieve efficiencies, improve capacity and withstand financial shocks (min population 500k).
- Prioritise the delivery of high quality and sustainable public services.
- Meet local needs and be informed by local views.
- Support devolution arrangements.
- Enable stronger community engagement and neighbourhood empowerment.

2.5 The Minister's letter set out an expectation that Leaders in Gloucestershire would work collaboratively. Where more than one proposal is to be submitted, councils must state clearly which authorities support which option, using shared evidence based and consistent assumptions.

2.6 The local council elections in May 2025 resulted in a change in administration at GCC. Following the change of administration, it was then agreed that all councils would work together to develop the business cases for the single county unitary option and the east/west two unitary model.

2.7 GCC commissioned PricewaterhouseCoopers (PwC) to undertake both the analysis and full business case development of two options for LGR in Gloucestershire: a single unitary authority model and a two unitary, east west model (East / West). The analysis and the final business cases are designed to support an evidence-based assessment of both options against the government's published criteria, against which full proposals will be assessed.

2.8 The approach taken has been to evaluate all available data and evidence impartially, with no predetermined outcome. Joint governance was established across all seven councils that included Leaders, Chief Executives, senior officers and consultants who worked in a series of workstreams to gather data, conduct analysis and develop the final business cases.

2.9 Gloucester City Council has progressed the development of the Greater Gloucester proposal separately from the other councils. Although Gloucester City has developed its own proposal, all councils committed to sharing data and information openly to enable the development of all business cases.

2.10 This has resulted in three business cases that are now being put forward for Gloucestershire:

- Option 1: A single county-wide unitary authority (1UA) covering the whole county of Gloucestershire (population size c.660,000). Developed jointly by all councils in Gloucestershire.
- Option 2: Two east/west unitary authorities (2UA-EW) for the county, aligning with the district council boundaries in the east of the county (Cheltenham,

Cotswold and Tewkesbury, population c.311,000) and the west of the county (Gloucester, Forest of Dean and Stroud, population c.349,000). Developed by all councils in Gloucestershire.

- Option 3: A unitary for Gloucester and a unitary for the remainder of Gloucestershire (2UA-GG). This is comprised of a Greater Gloucester Council (an expanded footprint of the existing Gloucester City Council population c. 179,000) and a Gloucestershire Council (amalgamation of the remainder of the surrounding councils with a projected population of c.470,000). This proposal has been developed solely by Gloucester City Council.

2.11 Following the submission of the business cases, the high-level timetable is as follows:

Statutory consultation by Government	November 2025 to January 2026
Government decision on which proposal to implement	March 2026
Making of secondary legislation to provide legislative basis for new unitary councils	Summer to Autumn 2026
Elections to Shadow Authorities – Members elected to new council(s)	May 2027
Shadow period	May 2027 to March 2028
Vesting – unitary councils come out of “shadow” and existing councils are formally abolished	April 2028

2.12 In March 2025, full council expressed a clear preference for an east/west two unitary proposal to be submitted at the interim stage. CBC’s interim proposal set out the strategic rationale for an east/west structure while recognising that other councils might take a different view. Under the mandate, while CBC has clearly stated that it will work positively to implement whatever LGR decision is made by the Government, it has continued to develop a policy statement setting out the strategic case for two unitary councils.

2.13 The appended reports update that position considering the final full business cases being submitted to Government and the formal consultation that will follow.

2.14 A council may either submit its own proposal or a joint proposal with other authorities; however, a council cannot make multiple submissions and therefore

cannot indicate support for more than one final proposal. The legislation requires councils to be consulted on any proposal(s) for LGR within their area before it is implemented. That consultation will provide a further opportunity for CBC to contribute its views once Government has confirmed the next stage in the process.

2.15 While the Minister expressed a preference for a single submission from Gloucestershire, it is normal for multiple proposals to be received from areas with differing perspectives, as has been seen elsewhere in the country. CBC therefore sets out its preference for two unitaries as a matter of record, a statement of principle that will inform its engagement with partners and with Government during the forthcoming consultation.

3 Reasons for recommendations

3.1 LGR must create councils capable of serving Gloucestershire effectively for the next fifty years, not just the next five. The Government will ultimately make the final decision on the shape of local government in Gloucestershire. However, through the statutory invitation and the criteria set out, the Ministry of Housing Communities and Local Government (MHCLG) have presented a once in a lifetime opportunity for members to both develop and have a view on which option will best serve residents and businesses in Gloucestershire.

3.2 All three LGR options that have been developed can be found in appendices iii-v. All business cases are lengthy and detailed documents which include everything from proposed democratic arrangements, financial analysis, outline operating model and options appraisals against the government criteria.

3.3 Significant portions of the content between the single unitary and the east/west unitary options is similar due to the nature of the way they were developed. However, differences in content appear within certain sections – particularly the financial analysis and options appraisal, where the single unitary and the east/west proposals diverge.

3.4 The Greater Gloucester business case is significantly different from the other two options as Gloucester City Council has developed this option separately to the other councils. Key differences in their assessment of the options appraisal demonstrate that explaining how proposals meet the Government’s criteria are subjective and open to interpretation. Ultimately it is up to the members to review all business cases in making their recommendations to Government and then up to the Government to make the final decision on which option will be delivered.

3.5 Following advice, it has been confirmed that it is a decision for the Cabinet on whether CBC chooses to support one of the proposals as part of the submission to Government. As such the role of Full Council is to both discuss and then fulfil

an advisory role to the Cabinet. Alongside the opportunity to ask questions and debate the options, Full Council will also undertake an advisory vote. The results of that vote will then support Cabinet in making their final decision at their meeting final decision on November 18 2025. Cabinet's decision on which LGR option to support will then form part of a joint submission to Government setting out which councils support each option.

The case for an east/west two unitary council.

3.6 At Full Council in March, the majority of members supported a two unitary, east/west model for Gloucestershire. Under this strong mandate CBC has continued to develop a case for why an east/west unitary would be the best long-term fit for Gloucestershire.

3.7 While all seven councils have worked extremely well together in development of two of the business cases, it is inevitable there were differing views across each of the councils as analysis was completed and sections were drafted. This resulted in compromises being made to reach content which was acceptable to all councils. The options analysis and financial analysis were two areas which received scrutiny due to the assumptions underpinning any financial model and the subjective nature and associated arguments contained in the options appraisal.

3.8 For these reasons, CBC has produced its own policy statement to accompany the business cases, ensuring that Cheltenham's voice – and the case for why a two-unitary model is the best fit for residents and businesses – is clearly presented. In appendix 6 the full policy statement *Stronger Places, Stronger Gloucestershire: the case for East and West Gloucestershire. One County, two unitary councils* can be found in full. The statement is included to ensure CBC's position is clear and evidence based as Government considers the options for reorganisation. LGR is a significant decision point for Gloucestershire. While it is ultimately for Government to determine the preferred structure, councils have the opportunity and responsibility to help shape the outcome. Expressing a clear position now enables CBC to influence the process constructively and ensure that any reform works for residents, businesses, and communities.

3.9 *Stronger Places, Stronger Gloucestershire* (appendix 6) supports the view that the two-unitary, east/west model best meets the test of securing the best future for Cheltenham and Gloucestershire in the long-term. It represents a once-in-a generation opportunity to design councils that reflect Gloucestershire's dual economic and civic centres and its network of market towns and rural communities. Two unitary authorities that would be large enough for strategic capability and financial resilience, yet small enough to stay connected and locally accountable.

3.10 Two unitaries would ensure:

- **Distinct place identity and economic opportunity:** Gloucestershire is not one place but a collection of diverse communities. A single structure risks flattening that diversity into county-wide averages. Gloucestershire's unique two centres of gravity, Cheltenham and Gloucester, and their contrasting geographies demand distinct leadership to unlock their full economic potential
- **Right scale for impact:** Councils of around 310–350,000 residents each would balance efficiency with visibility, enabling decisions that make sense locally.
- **Prevention and proximity:** Smaller, connected councils are better able to intervene early, use data intelligently, and build trusted relationships with residents.
- **Democratic legitimacy:** Residents must be able to recognise, reach, and trust their council; governance must feel close and representative. Two unitaries will also help protect numbers of councillors across Gloucestershire and not see reductions through future boundary reviews.
- **Reform that endures**: A structure designed to last that is agile, connected, and sustainable, avoiding unnecessary complexity or future restructuring.

3.11 The council's assessment of the business cases, alongside its own analysis of Gloucestershire's geography, economy and civic identity, indicates that a two-unitary model offers the strongest long-term foundation for effective local government. The case for this preference rests on five interrelated reasons:

- **Dual centres of gravity**: Gloucestershire's two urban anchors, Gloucester and Cheltenham, sit at the heart of contrasting but complementary economies. Separate unitaries allow each to lead with focus while preserving the diversity that defines the county.
- **Right scale for connection and capability**: Councils of 310–350,000 residents are large enough for strategic delivery and financial resilience, yet small enough to stay connected, agile and accountable.
- **Economic leadership through specialisation**: Two councils can drive growth in distinct national sectors: clean energy and sustainable industry in the west; cyber, technology and innovation in the east.
- **Reform that redesigns how we work**: Two unitaries create the conditions for prevention-first services, place-based housing delivery and agile, data-driven operations that respond quickly to residents.
- **Democratic legitimacy and long-term trust**: Residents identify with councils that reflect their communities. Two balanced authorities sustain visible leadership and political diversity without recreating additional governance layers.

3.12 Endorsing this position at this stage allows the council to:

- Demonstrate strategic leadership within Gloucestershire's ongoing reorganisation discussions.
- Provide clarity to Government, partners and residents on Cheltenham's preferred direction of reform.

- Ensure that the borough's interests are represented in shaping any future governance or devolution arrangements.

4 Devolution

4.1 The release of the Government's white paper in December 2024 promised devolution for all areas of England with the ambition to create Mayoral Strategic Authorities (MSA) nationwide.

4.2 The first six areas were selected as part of the devolution priority programme. Gloucestershire was not in an advanced position and so was not included in that first wave of creating new MSAs.

4.3 At the time of writing this report, there has been no further update on when further rounds of devolution will be undertaken creating the risk that Gloucestershire may result in being left behind in its ability to gain greater regional powers.

4.4 LGR was intended to 'unlock' devolution but, at present, it is likely that Gloucestershire will move to implement unitary local government without participation of devolution.

4.5 All seven councils have been exploring Gloucestershire's devolution options. At the previous Council meeting in March, Council expressed a preference for Gloucestershire to join the West of England Combined Authority (WECA). However, this remains only a preference with other options still under consideration.

5 Alternative options considered

5.1 Three options for LGR are being put forward, as described above.

5.2 While this report and associated appendices highlight the council's previous preference for a two unitary, east/west model, it is ultimately a decision for members to debate the LGR business cases available. Following deliberation and council undertaking an advisory vote to express a view on each LGR option, Cabinet will then proceed to making the final decision on which option to support as part of the submission to Government.

5.3 A preference for a two unitary model and a policy statement supported by Council and subject to Cabinet decision will not impede the council's ongoing commitment to working collaboratively with Gloucestershire councils, stakeholders and Government as the process of LGR and devolution progresses and we will continue to work hard to ensure that, following the Government's decision on what structure to implement, Cheltenham's residents and businesses continue to receive high quality and sustainable services.

6 Consultation and feedback

6.1 CBC has worked collaboratively with partner authorities across Gloucestershire throughout the development of LGR business cases. This has included participation in the Leaders' Group, officer working groups and the commissioning of analysis. These forums have provided a shared evidence base, consistent assumptions and constructive discussion on the future shape of local government in the county.

6.2 As set out in the Minister's letter of February 2025, councils are expected to work jointly wherever possible while recognising that differing local preferences may emerge. It was therefore anticipated from the outset that more than one option would be brought forward. The business cases now reflect those differing perspectives.

6.3 CBC's previous preference for a two-unitary structure is grounded in the shared technical evidence but places greater weight on local identity, economic specialisation and democratic legitimacy. The council has discussed its emerging position with neighbouring authorities and has sought to maintain an open and constructive dialogue.

6.4 This report and the supporting document 'Stronger Places, Stronger Gloucestershire' in appendix 6 does not represent a separate LGR submission to Government but a policy statement designed to inform forthcoming consultation. The document will be shared with Gloucestershire councils, partners and stakeholders to ensure Cheltenham's reasoning is clear and to contribute to a county-wide conversation about the right long-term structure for local government.

6.5 Government will run the formal public and stakeholder consultation on the options in the coming months. CBC will participate fully in that process, working collaboratively with other Gloucestershire councils to ensure residents, businesses and partners can contribute their views.

7 Key risks

7.1 The main risks relate to the inherent uncertainty of the Government's reorganisation process and if the process is managed carefully. This risk is being actively managed through clear communication, shared evidence, and continued collaboration across Gloucestershire. These are set out in appendix 1.

Report author:

Gareth Edmundson, Chief Executive, gareth.edmundson@cheltenham.gov.uk

Appendices:

1. Risk Assessment
2. Equality Impact Assessment – Screening
3. Single Unitary Business Case
4. Two Unitary, east/west business case
5. Greater Gloucester/Gloucestershire Business Case
6. Policy Statement – Stronger Places, Stronger Gloucestershire

Background information:

Cheltenham Borough Council, Local Government Reorganisation, Interim Case and letter from Gloucestershire Leaders, March 2025

Local Government Reorganisation: Policy and programme updates

English Devolution White Paper

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
408	Local Government Reorganisation – if local government re-organisation is not managed effectively then it may impact on financial viability, services to residents, motivation and retention.	Gareth Edmundson	4	4	16	Reduce	Discussions with MHCLG and neighbouring councils ongoing. Response to government consultation Ongoing communication with staff e.g. all staff meetings	Gareth Edmundson	July 2026

Appendix 2: Equality Impact Assessment (Screening)

1. Identify the policy, project, function or service change

a. Person responsible for this Equality Impact Assessment	
Officer responsible: Gareth Edmundson	Service Area: Cheltenham Borough Council
Title: Local Government Reorganisation	Date of assessment: 24/10/2025
Signature: Gareth Edmundson	

b. Is this a policy, function, strategy, service change or project?	Other
Local Government Reorganisation final submissions	

c. Name of the policy, function, strategy, service change or project	
Local Government Reorganisation final submissions	
Is this new or existing?	**New or proposed**
Please specify reason for change or development of policy, function, strategy, service change or project	
Devolution White Paper released by MHCLG in December 2024, followed by statutory invitation for local government reorganisation	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	• To make local government structures simpler for residents and businesses • To deliver efficiencies • To deliver high quality and sustainable services • To improve and strengthen local or regional decision making and support economic growth, investment and prosperity
	• To deliver savings • To make councils more resilient • To deliver joined up high quality services

Objectives:	• To improve prevention and intervention • Deliver more housing
Outcomes:	• Making taxpayers money go further • Increase investment, jobs and economic growth • Improve wellbeing of residents
Benefits:	• Reduce costs and demand on care services • People living healthier for longer • Reductions in unemployment • More higher value jobs available to local people with the right skills to succeed • Fewer children and young people requiring intervention

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Unsure**

Please provide an explanation for your answer:

The Government has yet to decide on what structures will be in place in Gloucestershire, so it is premature to make a full assessment, however, the ultimate aim is to deliver more efficient, joined up government that improves services for residents and businesses.

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate

Stage Two required	**Yes**
Owner of Stage Two assessment	Gloucestershire-wide assessment required
Completion date for Stage Two assessment	To be considered when government have determined the structure of local government, likely in 2026.

Please move on to Stage 2 if required (intranet link).

This page is intentionally left blank

Local Government Reorganisation in Gloucestershire

Single Unitary Authority (1UA) Full Proposal

Contents

Executive Summary 3

Introduction and Context 6

The Strategic Case (Vision & Ambition) 18

Future Devolution 30

Options Analysis 36

The New Council: Future Operating Model 65

The New Council: Workforce 69

The New Council: Digital, Data and Technology 73

The New Council: Democratic Arrangements 80

The New Council: Empowering Gloucestershire – Our New Locality Arrangements 83

The Financial Case for a Single Unitary for Gloucestershire 92

Engagement to Discover and Improve 101

Implementation Roadmap 107

Appendix 1: Vision and Ambition 'Personas' 123

Appendix 2: Digital, Data, and Technology Case Studies 129

Appendix 3: Public Engagement Report (Cratus) 133

Appendix 4: Summary Report of Feedback from Partner Organisations (Engagement conducted June - August 2025) 168

Appendix 5: Detailed Options Analysis 201

Appendix 6: Proposed Service Delivery Models 250

Appendix 7: Equalities Impact Assessment (1UA) 261

Executive Summary

Gloucestershire is poised for a bold transformation in local governance. This proposal recommends replacing the current two-tier system of county, district, borough, and city councils with a **Single Unitary Authority (1UA)** serving all ~659,000 residents. The 1UA model will streamline decision-making, eliminate duplication, and unlock significant financial and operational efficiencies - while strengthening local identity and empowering communities through innovative **Neighbourhood Partnerships**.

This reorganisation is not just structural, it's strategic. It aligns with Ministerial criteria for Local Government Reorganisation (LGR) and positions Gloucestershire as a national leader in regional devolution, ready to shape the future of public service delivery.

Economic and Demographic Context

- Gloucestershire's economy generated **£22.1bn GVA** in 2023, with strengths in **advanced manufacturing, cyber, aerospace, and agri-tech**
- **The population is projected to grow by 17.6% by 2047**, with a sharp rise in residents aged 65+
- Pressing challenges include **housing affordability**, **rural isolation**, and **climate resilience.**

Our Vision and Ambition

We're building on what makes Gloucestershire great to create a sustainable place with thriving communities, bold ideas, and opportunities for everyone. LGR is the enabling change that allows us to meet these challenges and deliver a ***smarter, fairer, and greener Gloucestershire***. Our six ambitions are:

1. **Driving breakthrough innovation for national resilience**
2. **Harnessing digital to tackle inequality, improve services, and drive innovation**
3. **Empowering communities through co-design and local decision-making**
4. **Putting wellbeing, housing, and nature recovery at the heart of growth**
5. **Unlocking talent, skills, and housing for inclusive growth**
6. **Using data to transform transport and public services**

These ambitions are designed to unlock Gloucestershire's full potential and deliver tangible benefits for residents.

The 1UA Financial Case

Potential day one financial position (c. 1st April 2028)	
Total income	£851.4m
Total expenditure	£851.4m
Net position	£0.0m
Reorganisation Costs and Benefits	
Gross annual reorganisation savings	£21.1m
Ongoing annual disaggregation costs	£0.0m
Net annual savings	£21.1m
One-off transition costs	-£21.3m
Payback period	2.0 years
Cumulative net saving after 5 years	£58.7m
Cumulative net saving after 10 years	£164.0m
Transformation benefits	
Recurring annual transformation savings fully delivered by year 5 – **Base**	£16.0m
Recurring annual transformation savings fully delivered by year 5 – **Stretch**	£26.2m

Governance, Democracy, and Place

- **110 councillors** for Gloucestershire
- A unified electoral cycle and **streamlined decision-making**
- Strong locality working via **Neighbourhood Partnerships** (15–25 neighbourhoods, 20k–50k population each)
- **Trusted, innovative partnerships** with Town and Parish Councils and the Voluntary, Community, Faith and Social Enterprise (VCFSE) sectors.

Digital, Data, and Technology (DDaT)

- A **digitally enabled council** with inclusive, responsive services
- Investment in **AI**, **predictive analytics**, and **cloud platforms**
- Focus on **digital inclusion** and robust infrastructure.

Built together, backed by evidence

Our proposals have been developed by **all Gloucestershire councils working together** in setting the vision, using a common evidence-base, and working within a single financial model and option appraisal process.

Our **public and stakeholder engagement has enriched and improved our proposals**. We are committed to delivering better outcomes for and with local people and making **LGR the platform for a better Gloucestershire.**

Both the single unitary (1UA) and two unitary (2UA) proposals have been developed using a common evidence base, shared data sources, and consistent analytical methods. As a result, there are significant similarities across both proposals.

In addition to the geographic footprints, key differences between the 1UA and 2UA proposals are highlighted within the shared options analysis and the respective financial cases.

Introduction and Context

Gloucestershire isn't like anywhere else in the UK.

From postcard-perfect Cotswold villages to codebreaking at GCHQ and the roar of the Shed at Gloucester Rugby, this is a county where history fuels a thriving present. Our culture, economy, and identity are deeply rooted yet rapidly evolving.

We're not defined by a single centre. Gloucestershire is a proud network of city, towns, villages, and rural communities, each with its own pulse. Cheltenham leads in innovation, Stroud bursts with creativity, the Forest of Dean harnesses natural assets, Tewkesbury drives manufacturing, Gloucester powers civic life, and the Cotswolds are shaping the future of sustainable energy.

Our diverse places have built a rich patchwork of industries, cultures, and stories. And now, with a bold vision for the future, a single tier of local government could unlock even more. A devolved Gloucestershire would be decentralised, interconnected, and resilient - ready to turn its unique strengths into shared success.



This document sets out the case for change for a new model of local government in Gloucestershire – a model that will enable us to build on what makes Gloucestershire great, to create a sustainable place with thriving communities, fresh ideas, and opportunities for everyone.

About Gloucestershire

Gloucestershire sits at the northern edge of the South West - perfectly placed and powerfully connected. It borders three unitary authorities - South Gloucestershire, Swindon, and Wiltshire - and links to Oxfordshire, Warwickshire, Worcestershire, Herefordshire, and Monmouthshire. Sitting to the north of the M4 / M5 crossroads, with the M5 weaving northwards through the county, Gloucestershire links north and south, east and west, and connects several major UK cities Cardiff, Bristol, Birmingham, Oxford, and London. The River Severn winds through the county's core, shaping both landscape and life.

Though 87.5% of the county is rural, **over 70% of residents live in urban areas**[1]. Cheltenham and Gloucester are the beating hearts of business, education, culture, and commerce, supported by a network of vibrant market towns that fuel local economies and serve rural communities.

- The population of Gloucestershire is currently 659,276[2]
- Gloucestershire spans 265,253 hectares[3]
- We are proud to have two Areas of Outstanding Natural Beauty (AONB): the Cotswolds and the Forest of Dean
- Gloucestershire also has 12 National Nature Reserves and some 120 Sites of Special Scientific Interest (SSSI) within its borders
- According to the 2011 Census, 83.1% of Gloucestershire residents also work in the county[4].

Population Change

Gloucestershire is growing, and fast. Between 2014 and 2024, the county's population has risen by 7.8%, outpacing the national average of 5.9%. But growth hasn't been even. Districts like Tewkesbury are booming, with a staggering 16.6% population increase, ranking in the top 10% of fastest-growing local authorities six times since 2014[5].

At the same time, **Gloucestershire is ageing.** People aged 65+ make up 22.1% of the population, well above the national average of 18.8%. In rural areas like the Cotswolds and Forest of Dean, that figure climbs above 25%. The county also has fewer children and working-age adults than the national average.
Gloucester and Cheltenham have the highest proportions of young people within

[1] Rural Urban Classification 2021
[2] Mid 2023 Population Estimates, ONS
[3] SAM 2023, ONS Area to Mean High Water Excluding Area of Inland Water (Land Area) (AREALHECT)
[4] 2011 Census, ONS
[5] Mid Year Population Estimate. ONS

the county, reflecting their urban character and the presence of educational institutions.[6]

Looking ahead, the population is projected to grow by **113,929 people by 2047** - a 17.6% increase, far above the 12.7% forecast for England and Wales. Tewkesbury and Stroud are set for even greater projected growth of 29.6% and 22.2% respectively, driven by more available land for development. Cheltenham, by contrast, is expected to see the smallest rise at 10.1%[7].

Economy

Gloucestershire's natural beauty is both a challenge and a magnet. With AONBs covering large parts of the county, development can be constrained, but this same environmental quality makes the county a magnet for talent, investment, and tourism.

The economy is strong, diverse, and resilient. In 2023, Gloucestershire's economy generated £22.1 billion in GVA - 12.8% of the South West's output and 1% of the UK total[8]. It's a county where quality of life meets business opportunity.

Gloucestershire offers a powerful mix: **a skilled workforce, strong connectivity, available land, and a high-quality environment.** That's why it's home to major players like GE Aviation, Safran, Renishaw, EDF Energy, Ecotricity, Unilever-Walls, and St. James's Place, alongside a thriving ecosystem of entrepreneurs and innovators.

With deep roots in defence and aerospace, the county remains a manufacturing powerhouse, especially in advanced engineering. It's also a national centre for cyber and intelligence, anchored by GCHQ, the National Cyber Security Centre, and a growing cyber business park.

Despite its specialisms, **Gloucestershire's economy is diverse and balanced.** In 2023, the top employment sectors were wholesale and retail (14.8%), health and social care (13.8%), and manufacturing (10.6%)[9] - a mix that supports **stability and adaptability**.

Challenges Facing Gloucestershire

But Gloucestershire isn't without its challenges. Demographic change, widening inequalities, pockets of deprivation, environmental pressures, and rural isolation all pose serious hurdles to inclusive, sustainable growth.

[6] Mid Year Population Estimate. ONS
[7] 2022 based Subnational Population Projections, ONS
[8] Regional gross value added (balanced) per head and income components, ONS
[9] BRES, ONS

Demographic Change

Gloucestershire's population is ageing, and faster than the national average. By 2047, the number of residents aged 65+ is projected to surge by 43.4% (compared to 38.6% nationally), making up over a quarter (26.8%) of the county's population. Tewkesbury is set to see the sharpest rise at 54%, while even the lowest increase - 32.4% in the Forest of Dean - is significant[10].

At the same time, the working-age population (18-64) is barely growing, and the number of children and young people is expected to decline. This shift is reshaping the county's social and economic landscape.

More people are living with disabilities and long-term conditions across all age groups. There's also a rise in single-person households with limited family support, and a growing number of children with special educational needs (SEN) since 2015, all adding pressure to already stretched health and social care services.

By 2047, Gloucestershire's **dependency ratio** (the number of dependents per 100 working-age people) is projected to rise from 65 to 70[11]. That means fewer people supporting more, placing increasing strain on services, budgets, and the local economy.

The challenge is clear: how do we continue delivering high-quality care and support while maintaining a healthy, productive economy in the face of rapid demographic change?

Inequalities and Deprivation

Gloucestershire performs well overall, but averages hide deep inequalities. While county-wide outcomes often exceed regional and national benchmarks, they mask stark local disparities. 12 neighbourhoods across Gloucester, Cheltenham, Tewkesbury, and the Forest of Dean (home to a combined 3.2% of the county's population) rank among the **10% most deprived in England[12]**.

Some communities face even greater barriers to inclusion and opportunity, including **rough sleepers, non-white and non-English speaking residents, traveller communities, and asylum seekers**. For these groups, access to healthcare, education, and skills development is often harder, and outcomes are worse.

[10] 2022 based Sub-national Population Projections, ONS
[11] 2022 based Sub-national Population Projections, ONS
[12] Indices of Deprivation 2019

Access to Housing

Housing in Gloucestershire is expensive, and getting on the property ladder is tough. In 2025, the average home cost **8.6 times the median salary**, higher than the national average (7.5) and just above the South West average (8.5). But this affordability varies widely: in Gloucester, the ratio is 7.3 and, in the Cotswolds, it soars to 13.8.

With mortgage lenders typically capping loans at 4.5 times income, many residents are priced out, forced into unsuitable housing, or pushed out of the county altogether. This makes it harder to attract and retain young people, key workers, and future talent[13].

Despite these pressures, housing supply has grown. Between 2019 and 2024, the number of dwellings in Gloucestershire rose by **5.2%**, outpacing both the regional (4.6%) and national (4.7%) averages[14].

Yet unlocking further housing and growth remains a major challenge. Much of Gloucestershire doesn't have a five-year housing supply, increasing the likelihood of speculative planning applications, misalignment with local priorities, and unsustainable growth. Planning constraints, infrastructure limitations, and the need to protect Gloucestershire's natural and historic environment all create friction. Balancing growth with sustainability, affordability, and community needs will be critical to the county's future.

Recent updates to the National Planning Policy Framework and the anticipated Planning and Infrastructure Bill promise a step change in housing delivery. The Bill will introduce a statutory Spatial Development Strategy, giving Gloucestershire a powerful new tool to shape future growth. Combined with the streamlining of the planning system via unitarisation, this could unlock significant sustainable development across the county. We must seize this opportunity, while being conscious of possible environmental and democratic risks.

Rural Isolation

Gloucestershire's rural charm is one of its greatest strengths, but also one of its biggest challenges. With 87.5% of the county classed as rural and nearly 30% of residents living in these areas, access to essential services isn't always easy[15]. Nearly **one in five people** live in areas ranked among the **20% most deprived in England** in terms of Barriers to Housing and Services[16].

[13] Median House Prices to Median Workplace Earnings, ONS
[14] Live tables on dwelling stock, MHCLG
[15] Rural/Urban Classification, 2022, ONS
[16] Indices of Deprivation, 2019, MHCLG

Travel times to key services - whether by public transport, car, or active travel - are longer than both regional and national averages[17]. And while high-speed broadband now reaches almost every address, **digital exclusion persists**: 4.4% of residents didn't use the internet at all between May 2023 and March 2024. In rural areas, where public internet access points can be over 45 minutes away by bus, those without a car face real digital isolation[18].

The challenge is clear: we must ensure Gloucestershire's most vulnerable and isolated residents stay connected - to services, to support, and to opportunity.

Climate Change and Flooding

Gloucestershire is making strides on sustainability, but the climate crisis is accelerating. Despite strong progress by county and district councils in cutting emissions and embedding greener practices, the risks to our communities, infrastructure, and economy are growing.

Climate Leadership Gloucestershire has been established as a strategic partnership of public sector bodies - including local councils, the NHS, police, and academic institutions - to coordinate and lead the county's response to the climate and ecological emergency.

Extreme weather is becoming more frequent and more severe. Gloucestershire is impacted by severe flooding, droughts, and heatwaves. A growing risk of wildfires has also been highlighted by agencies including the Forestry Commission, Gloucestershire Fire and Rescue Service, and Gloucestershire Wildlife Trust.

Flooding remains one of Gloucestershire's biggest climate threats. The devastating 2007 floods damaged around 5,000 homes and 500 businesses, leaving 135,000 people without water for two weeks. Even less intense events in 2012 and 2013 caused widespread disruption. But the impact goes far beyond damaged buildings. **Flooding hits lives, livelihoods, and mental health, especially for the most vulnerable.** That's why climate resilience must be front and centre in our housing strategy and growth plans.

The Current Model of Local Government in Gloucestershire

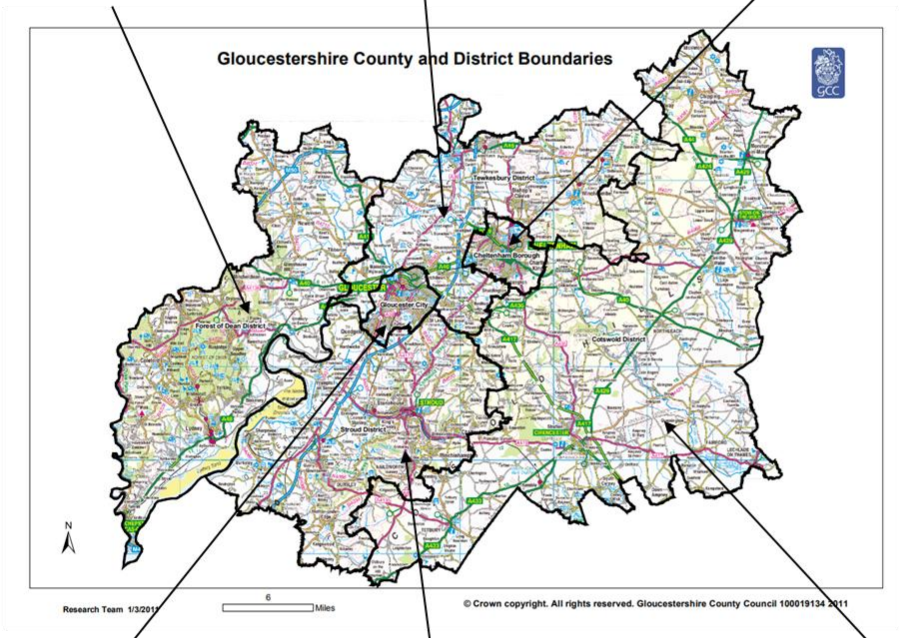
Gloucestershire operates under a two-tier system: a single county council alongside five district and borough councils and one city council. Most of the county is also covered by a network of **267 parish and town councils**, adding a third layer of local governance in most areas.

[17] Journey Time Statistics 2019, DfT
[18] Participation Survey, DCMS

Tewkesbury Borough
Administrative centre: Tewkesbury
Population: 98,896
Net Revenue Expenditure:
£7,884,000

Forest of Dean District
Administrative centre: Coleford
Population: 89,104
Net Revenue Expenditure:
£10,413,000

Cheltenham Borough
Administrative centre: Cheltenham
Population: 120,255
Net Revenue Expenditure:
£18,698,000



Gloucester City
Administrative centre: Gloucester
Population: 134,991
Net Revenue Expenditure:
£17,543,000

Stroud District
Administrative centre: Stroud
Population: 124,540
Net Revenue Expenditure::
£21,176,000

Cotswold District
Administrative centre: Cirencester
Population: 91,490
Net Revenue Expenditure:
£16,028,000

Political Landscape

With each council on a different electoral cycle, Gloucestershire holds local elections every year, creating a constantly shifting political landscape.

Cheltenham Borough Council	Leader and Cabinet model	Liberal Democrat majority administration
Cotswold District Council	Leader and Cabinet model	Liberal Democrat majority administration
Forest of Dean District Council	Leader and Cabinet model	No overall control; Green minority administration
Gloucester City Council	Leader and Cabinet model	No overall control; Liberal Democrat minority administration

Stroud District Council	Committee system	No overall control; Green minority administration
Tewkesbury Borough Council	Committee system	No overall control; Liberal Democrat minority administration
Gloucestershire County Council	Leader and Cabinet model	No overall control; Liberal Democrat minority administration

Table 1: Current political control across Gloucestershire

Gloucestershire's seven councils have 295 councillors, 37 of whom serve at both county and district / borough levels. In many areas, overlapping ward boundaries mean residents can be represented by up to **four different councillors**: one at the county level and three at the district or borough level. This layered system can create complexity in local representation and decision-making.

Number of councillors	**Gloucester City**	**Cheltenham Borough**	**Tewkesbury Borough**	**Stroud District**	**Cotswold District**	**Forest of Dean District**	**Gloucestershire County Council**
Liberal Democrats	17	36	16	2	21	1	27
Labour / Labour and Co-operative	7			18		4	1
Conservative	11		9	6	10	6	6
Green		3	4	24	2	15	9
Independents / Other	4	1	8	1	1	10	1
Reform			1			2	11

Table 2: Current political make up of Gloucestershire's councils

Partnerships and Joint Working

Gloucestershire thrives on strong partnerships within the county and beyond. We have a proven track record of coming together to tackle big challenges, and unitarisation offers a powerful opportunity to build on that foundation, strengthening collaboration and delivering even greater impact.

Statutory Partners

Gloucestershire's public sector is unusually coterminous. A single police constabulary and one police and crime commissioner serve the entire county. The county council also acts as the fire and rescue authority, with Gloucestershire Fire and Rescue Service fully integrated. While the county is currently served by a single NHS Integrated Care Board (ICB), this arrangement is set to evolve with the

formation of a new cluster alongside Bristol, North Somerset, and South Gloucestershire (BNSSG) ICB, marking a shift in how integrated care is coordinated across the South West region.

Some smaller units of delivery, such as primary care networks, fit within current district boundaries. There are three universities, the largest of which is the University of Gloucestershire, and over 300 schools.

A single unitary authority would unlock the full potential of Gloucestershire's aligned public services, turning these coterminous boundaries into a powerful platform for joined-up leadership, smarter delivery, and a stronger future for the county.

Joint Working

Gloucestershire already has a strong foundation for joint working, backed by a range of formal and informal governance arrangements**.** These reflect the close ties between different parts of the county and a shared commitment to collaboration.

Key structures include:

- **Leadership Gloucestershire:** a strategic alliance of senior public sector leaders - spanning councils, health, police, and key agencies - providing unified direction on cross-cutting issues to benefit communities countywide.
- **Gloucestershire City Region Board**: a joint committee of all seven councils, driving a shared vision for strategic growth and economic success, and championing Gloucestershire with partners, such as the Western Gateway Partnership, to attract further investment and growth.
- **Joint Economic Strategy Scrutiny Committee:** a joint scrutiny committee which holds the Gloucestershire City Region Board to account - reviewing decisions, tracking the impact of economic investments, and shaping future growth priorities.
- **Health and Wellbeing Board (HWB) and a Health and Wellbeing Integrated Care Partnership (ICP):** the HWB leads strategic coordination across health, social care, and public health services, bringing together leaders to tackle health inequalities and improve population wellbeing. The ICP develops and delivers the five-year integrated care strategy to improve health and care outcomes, aligning efforts across partners to reduce disparities and improve access and experience.
- **Strategic Local Plan**: when finalised, this will shape future housing and employment growth across three local planning authority areas.
- **Climate Leadership Gloucestershire**: an innovative public sector partnership of councils, NHS, police and academia institutions, developing solutions to tackle the climate emergency.

- **Gloucestershire Business Rates Pool:** Gloucestershire boosts local growth by pooling business rates to keep more revenue circulating within the county.
- Other informal arrangements exist to enable joint working on other areas of shared responsibility, e.g. **Gloucestershire Resources and Waste Partnership**, **Gloucestershire Strategic Migration Partnership**, **Gloucestershire Housing Partnership**, and the **Gloucestershire Children and Young People's Coalition**.

Beyond formal governance, collaboration is also embedded in service delivery:

- **Ubico**: a local authority-owned company delivering a range of environmental services across Gloucestershire and West Oxfordshire, including waste, recycling, and street cleansing.
- **Publica**: a shared services partnership owned by Cotswold, Forest of Dean, Cheltenham, and West Oxfordshire councils. The councils work together through Publica to share skills and resources, including services such as ICT, customer services, benefits administration, housing, and car park enforcement.
- **Shared services**: various arrangements between different groups of councils for sharing back-office services, such as internal audit and risk (ARA) and legal services (One Legal).
- **Co-located services**: the Public Services Centre in Tewkesbury brings together the county council, borough council, police, health services, and the voluntary sector to provide a single access point for customers, pioneering the first Jobcentre Plus co-location in a local authority building.

These partnerships show what's possible but also highlight existing complexity. A more streamlined governance model could build on this strong collaborative culture, reducing duplication, and unlocking even greater impact for Gloucestershire's communities.

Economic Partnerships

Strong economic partnerships are the backbone of Gloucestershire's success - and devolution can take them even further.

Gloucestershire's Local Enterprise Partnership (LEP), GFirst, established in 2011, has played a key role in uniting business, public, and voluntary sectors to secure government funding and drive job creation. Its **Strategic Economic Plan** (SEP) has supported business growth and skills development and maximised the county's strategic location along the motorway corridor. In 2024, its functions transitioned to the county council, marking a new chapter with the creation of the **Gloucestershire City Region Board**.

Gloucestershire is actively shaping a bold, county-wide vision for inclusive and sustainable prosperity through the development of a **Local Growth Plan (LGP)**.

Although not mandated as for mayoral authorities, Gloucestershire's public sector leaders are stepping up with a LGP that reflects a **shared ambition to unlock the county's full economic potential and improve life for everyone who lives here**. Co-created by all local authorities and shaped through extensive collaboration with businesses, education providers, the voluntary sector, and local communities, the LGP sets out a clear, compelling roadmap for long-term growth and resilience.

By aligning with national frameworks, the plan positions **Gloucestershire as a key contributor to the UK's economic and social missions**, ready to attract investment and drive innovation.

Across the county, **district councils are leading bold, community-driven innovation**, including:

- **Cheltenham**: partnered with Hub8 by Plexal to launch the **MX Innovation Centre**, a workspace for the local tech community.
- **Cotswold:** rolled out a **low-income family tracker** to target support for households in financial difficulty.
- **Forest of Dean**: Forest of Dean District Council, the Centre for Sustainable Energy, and local resident-led group Forest Community Energy have partnered to roll out the AURORA project in the area. This project, supported by several European universities, **promotes energy saving** awareness through inspiring events, a carbon tracker app, and community-owned solar panels.
- **Gloucester:** acknowledged by Nesta and others as sector-leading in asset-based community development, including the establishment of an innovative community development organisation.
- **Stroud:** introduced a **crowdfunding platform** to empower community-led projects and access a share of funding from the council.
- **Tewkesbury**: the **Growth Hub** offers fully funded business support in partnership with the borough council.

A unitary model would supercharge this local innovation, strengthening place-based leadership, aligning economic strategy, and making it easier to deliver joined-up, community-focused growth.

VCFSE Partnerships

Gloucestershire's voluntary, community, faith, and social enterprise (VCFSE) sector, powered by over 4,000 organisations, is vibrant and vital. At its heart is the **Gloucestershire VCS Alliance**, the independent voice that informs, strengthens, and develops the sector. The alliance promotes equal partnerships

between VCSE (voluntary, community, and social enterprise) groups and the public and private sectors, supporting VCSE groups and organisations to become more sustainable.

The Know Your Patch (KYP) networks, launched in 2018, are another standout success. Led by local VCFSE organisations in each district, they bring together community groups, service providers, and public sector partners around a shared belief: **strong, connected communities are the foundation of resilient lives**.

The Strategic Case (Vision & Ambition)

Local Government Reorganisation Enabling **a Smarter, Fairer, Greener Gloucestershire**

Local government reorganisation (LGR) gives Gloucestershire the chance to deliver more for its residents and to play a stronger role – together – in supporting national priorities. Current structures can be complex and duplicative, making it harder to deliver the best outcomes for our residents and to join up decisions across planning, housing, transport, health, skills, and the environment. **Reorganisation offers the opportunity to simplify accountability and cut duplication, offering our residents greater clarity and improved services.**

This change is what makes our ambitions deliverable. Breakthrough innovation can be scaled when investment, land use, and regulation are aligned. Digital inclusion can be advanced when infrastructure, skills, and social support are considered together. Communities can have a stronger role when co-design is embedded consistently across local services. Wellbeing, housing, and nature recovery can be treated as interconnected priorities rather than separate silos. Talent and skills can be directly linked to affordable homes and clear career pathways. Underpinning this is how data can be used effectively across the system to improve services, strengthen transport connectivity, and prevent people from falling through the cracks of a widely dispersed county.

Gloucestershire brings major strengths; we have a world-class economy rich in both heritage and future innovation, outstanding natural capital, and a collaborative civic culture. We also face challenges: 19% of our residents live in the lowest national quintile for access to housing and services, our population has distinct and diverse needs, and opportunities are unevenly shared. LGR is the enabling change that allows us to meet these challenges and deliver a ***smarter, fairer and greener Gloucestershire***. Our six ambitions set out how:

- **Driving breakthrough innovation for national resilience**: harnessing Gloucestershire's industrial and research strengths to create resilience-focused solutions in cyber, aerospace, agri-tech, advanced manufacturing, and natural capital.
- **Harnessing digital to tackle inequality, improve services, and drive innovation**: ensuring every resident has the skills, connectivity, and confidence to access services, education, training, and work.
- **Empowering communities through co-design and local decision-making:** giving residents a stronger role in shaping services, with tools and partnerships that make delivery more responsive to local needs.

- **Putting wellbeing, housing, and nature recovery at the heart of growth:** treating health, affordable homes, and environmental recovery as the foundations of prosperity.
- **Unlocking talent, skills, and housing for inclusive growth:** linking education and training pathways directly to housing and careers that help people stay and thrive in Gloucestershire.
- **Using data to transform transport and public services:** creating trusted, joined-up intelligence to improve safeguarding, support early and anticipatory intervention, and deliver more effective integrated transport.

Our Vision: **We're building on what makes Gloucestershire great to create a sustainable place with thriving communities, bold ideas, and opportunities for everyone.**

Our Six Ambitions for Gloucestershire

Ambition 1: Driving breakthrough innovation for national resilience

Gloucestershire will build on its established strengths in cyber, aerospace, defence, agri-tech, and advanced manufacturing to become a national leader in resilience-led innovation. We will draw on pioneering anchors such as GCHQ, Golden Valley[19], and the proposed Severn Edge project[20] along with our agricultural research centres at Hartpury University[21] and the Royal Agricultural University[22]. By fostering clusters of excellence and supporting research and development (R&D), the county will generate high-value jobs, attract private and public investment, and contribute solutions in areas such as energy security, sustainable food systems, secure supply chains, and the restoration of natural capital. With the upcoming Western Forest[23], alongside our ambition that the Forest of Dean achieves biosphere status[24], we can work at scale on innovation in land management, biodiversity recovery, and climate adaptation.

With our landscapes working alongside our technological advancements, we can ensure that Gloucestershire's resilience is rooted in both its environment and its economy. LGR will strengthen this by removing fragmentation across planning, investment, and regulation, allowing innovation to move from pilots and single clusters to an at-scale resilient economy. This

[19] www.goldenvalleyuk.com
[20] https://western-gateway.co.uk/news-and-blogs/news/severn-edge-sites-potential-home-new-smr-technology/
[21] www.hartpury.ac.uk
[22] www.rau.ac.uk
[23] www.nationalforest.org
[24] www.fdean.gov.uk/planning-and-building/biosphere

integration means that innovation breakthroughs in our resilience-led sectors are both developed here and deployed consistently, ensuring benefits are felt not only by residents and businesses in Gloucestershire, but the whole of the UK.

Example benefits:

- **A start-up in Cheltenham's Golden Valley innovation district collaborates with local universities and industry partners to develop new cyber-security tools.** With LGR removing fragmentation across investment and regulation, the start-up can scale faster, attract national contracts, and create high-value local jobs - further anchoring Cheltenham's role in responding to the UK's cyber resilience requirements.
- **A farmer in the Cotswolds adopts new agri-tech tools developed in county innovation hubs.** By using soil sensors and precision irrigation, they improve soil health and resilience to climate change while reducing water and fertiliser use and costs. This not only strengthens the farm's long-term viability but also contributes to Gloucestershire's national reputation in sustainable food systems.
- **A small manufacturer in Tewkesbury trials AI-driven production planning in a regulatory sandbox, enabled by LGR.** The new system helps them cut waste, lower emissions, and respond more flexibly to supply chain pressures. Located near Ministry of Defence and defence sector supply chains, the firm boosts competitiveness and secures new contracts in low-carbon defence and aerospace markets. This demonstrates how resilience-led innovation can be scaled across advance manufacturing – the sector responsible for Gloucestershire's largest Gross Value Added (GVA) – while connecting with other resilience-led sectors, both locally and nationally.
- **A STEM (Science, Technology, Engineering & Maths) student in Stroud takes part in placements within Gloucestershire's clean energy sector, working directly on projects linked to the Severn Edge site.** They gain hands-on experience that secures their future career within their own community, while local employers benefit from a pipeline of home-grown talent that supports the county's transition to net zero and enhances the energy security of the UK.

Ambition 2: Harnessing digital to tackle inequality, improve services, and drive innovation

Digital inclusion remains inconsistent across Gloucestershire. Digital access is no longer optional – it is essential to ensuring opportunity and engagement with services. Residents, especially those living in rural areas, can suffer limited access to employment opportunities, education, or care, further exacerbating the hidden

poverty in the county. Building on projects such as the county-wide DigiHubs[25], based in GP surgeries and community centres, **Gloucestershire will ensure that every community has the infrastructure, connectivity, and skills to benefit from the world that digital offers.**

By tackling digital exclusion, we can ensure that residents who struggle to access services, training, or employment are not left behind. LGR offers the opportunity to align responsibility for infrastructure and respond to diverse demand across a complex geography, ensuring the benefits of digital investment are shared fairly across all communities. This also means all can match the pace of our most advanced future-facing sectors, as we offer support for those at risk of being left behind, so that innovation moves forward inclusively. Improved digital confidence will empower residents to participate fully in their communities, access vital support, and offer increased visibility of opportunity. **Digital innovation will drive the sustainable growth agenda, creating jobs and wealth for the county.**

Example benefits:

- **An older adult in Deerhurst, a rural village in Tewkesbury, manages chronic conditions from home using virtual healthcare tools.** Through secure video consultations and remote monitoring, they reduce hospital visits. LGR can enable this by aligning NHS and council investment in digital infrastructure, so rural areas have the same access to connectivity and digital services as urban centres.
- **A young person in Coleford, a market town in the Forest of Dean, accesses digital skills bootcamps**, gaining confidence and new opportunities in cyber, coding, and creative industries.
- **Carers can use predictive care tools to anticipate needs, freeing time to focus on personal interaction.** By receiving alerts when the person they support may need intervention, they are less reliant on emergency services and more able to plan ahead. This is only possible when health and social care data are brought together, made easier by LGR through creating a single system for sharing data securely and consistently.
- **One of Gloucestershire's many micro businesses uses digital tools to reach new customers and improve their service capability**, e.g. through online ordering or remote collaboration with suppliers. With coordinated county-wide investment in digital connectivity, even the smallest firms in rural areas can compete in wider markets, driving inclusive economic growth.

[25] Delivery of Digi-hubs | Gloucestershire County Council

Ambition 3: Empowering communities through co-design and local decision-making

LGR offers Gloucestershire the opportunity to expand co-design across the county by strengthening the role of the VCFSE sector in service design and delivery. **By giving communities real influence over budgets, priorities, and data, services will be more inclusive, locally responsive, and sustainable.**

Gloucestershire has already demonstrated how effective this approach can be: carers have shaped new support pathways through the Carers Hub[26], and the Gloucestershire Gateway Trust[27] has reinvested profits from the M5 services into projects in Gloucester and Stroud that tackle poverty and improve skills. Local groups in Stroud[28] and the Forest of Dean[29] have influenced health and wellbeing initiatives through community hubs.

With 19% of our population living in the lowest national 20% for access to housing and services[30], empowering communities to shape services based on their local needs is critical to both equity and prevention. Neighbourhood Partnerships are just one example of how LGR could provide a clear framework for convening services with residents – they would sit alongside a wider set of tools to ensure community voices are embedded in decision-making. This approach is founded on building trust and ensuring outcomes are shaped not only by those closest to the challenges, but those experiencing them.

Example benefits:

- **Local residents, councillors, and health practitioners in a Neighbourhood Partnership work together to reduce social isolation in Newent, a Forest of Dean market town.** By combining professional expertise with insights from local people, the Partnership develops community-led activities and accessible support. LGR enables this by aligning funding and decision-making, so neighbourhood priorities can be resourced and embedded within wider service planning.
- **A young carer in Cheltenham is able to provide input into the development of a digital tool with schools and youth services to balance education and caring responsibilities.** The tool provides tailored reminders, wellbeing check-ups, and links to local peer support groups. Because LGR enables education, health, and social care data to be better connected, the young carer's lived experience regarding the previous systems' lack of navigability are reflected. This makes services easier to

[26] https://gloucestershirecarershub.co.uk
[27] https://gloucestershiregatewaytrust.org.uk
[28] https://cscic.org/programmes/community-hubs/
[29] www.inclusiongloucestershire.co.uk/engagement/community-hubs/
[30] Accessibility - Transport | Inform Gloucestershire

find and use, ensuring their needs are met quickly without having to repeat their story to multiple service providers.

- **A community group in Gloucester collaborates with health providers to design culturally sensitive wellbeing services, improving uptake and trust.** By co-creating mental health support, for example, that recognises diverse cultural practices, more residents feel confident seeking help. LGR supports this by embedding the VCFSE sector within local decision-making frameworks, ensuring community voices are heard alongside statutory providers.
- **Families co-produce services in a local family hub in Tetbury, a Cotswold market town, which provides a family-friendly space.** Parents can take part in shaping early years support, parenting programmes, and wellbeing provision while their children are supported in a safe environment. This is possible because LGR brings together children's services, public health, and community development under one coordinated approach, so family hubs can act as genuine centres for co-creation and prevention.

Ambition 4: Putting wellbeing, housing, and nature recovery at the heart of growth

Wellbeing – with housing and nature recovery at its roots – will be a guiding principle in all policy and investment decisions. From affordable homes and transport to skills and public health, growth plans will be designed to reduce inequalities, improve access to green and blue spaces, and boost Gloucestershire's natural capital. Protecting and enhancing biodiversity, improving land use, and supporting nature-based solutions will strengthen resilience against climate change and create healthier environments for future generations.

Gloucestershire's natural assets also underpin a strong visitor economy. By linking tourism with wellbeing and nature recovery, communities benefit from thriving local businesses while ensuring green spaces remain accessible for residents. Aligning local priorities with Integrated Care System (ICS) prevention goals and CORE20PLUS5[31] frameworks targeting the most deprived 20% of the population (as well as groups experiencing worse-than-average outcomes), will help narrow health and wellbeing gaps across the county.

LGR would make this ambition deliverable by enabling a clear line of accountability across health, housing, and the environment. This coordinated approach can act to turn investment and service delivery into better outcomes for residents. This integration will allow decisions about new housing, green infrastructure, and public services to be planned together – ensuring that residents

[31] www.england.nhs.uk/about/equality/equality-hub/national-healthcare-inequalities-improvement-programme/core20plus5/

have both the secure homes and healthy environments they need. In Stroud, community-led housing and green infrastructure projects have already shown how affordable homes and access to nature can be developed hand-in-hand. With devolved powers, these approaches could be embedded and scaled county-wide, linking wellbeing, housing, and nature recovery as the foundation for genuinely inclusive growth.

Example benefits:

- **In the Forest of Dean, a community-led housing scheme integrates affordable homes with woodland management and local energy generation.** Residents not only gain secure housing but also benefit from reduced fuel bills, shared green spaces, and volunteering opportunities that strengthen community ties. This model reflects the Forest's long tradition of working with its natural assets and could be replicated across Gloucestershire, where LGR enables housing, environment, and community to be planned together.
- **A family in Northleach, a Cotswold market town, regularly uses redesigned green spaces that combine play areas, biodiversity planting, and community facilities.** These spaces give children safe places to play and create opportunities for families to meet neighbours, take part in local activities, and benefit from cleaner air. With wellbeing and social connection at their core, such spaces help reduce isolation and improve health outcomes across generations.
- **A disabled resident in Minchinhampton, a semi-rural town, moves into newly built affordable housing designed with accessibility and sustainability at its core.** The home is energy-efficient, reducing bills, and is linked to inclusive transport and nearby green infrastructure, such as sensory trails and accessible walking routes. This combination gives the resident greater independence, reduces their reliance on more intensive services, and enhances their quality of life. By ensuring housing is planned together with transport and green spaces, these wellbeing outcomes become part of everyday provision rather than specialist exceptions.
- **A landowner in South Cerney, a Cotswold village, participates in a countywide nature recovery scheme that restores habitats, improves flood resilience, and generates long-term natural capital value.** By adopting regenerative practices and working in partnership with local authorities and communities, they help protect biodiversity while strengthening the resilience of nearby housing and infrastructure. Crucially, this in turn enhances residents' wellbeing through multi-faceted environmental improvements that contribute to healthier, more secure day-to-day lives. The wellbeing gains are felt both immediately – through safer,

greener environments – as well as in the longer term, as communities experience less disruption and stress from climate-related risks.

Ambition 5: Unlocking talent, skills, and housing for inclusive growth

Gloucestershire will be able to establish a countywide skills and careers pathway to support lifelong learning and inclusive economic growth. By linking education providers, industry, and employers, residents of all ages and backgrounds will have access to training, apprenticeships, and reskilling opportunities. Tourism and hospitality provide major entry routes into work for young people and career changers. In aligning training pathways with this sector, LGR can help us ensure residents can build stable futures in one of Gloucestershire's most significant industries. Affordable and secure housing will be central to this ambition, providing the stability people need to seize learning opportunities and grow with the confidence that comes from a safe, stable home.

LGR would enable this ambition by aligning housing, skills, and economic development within the same framework. Currently, responsibilities are spread across multiple agencies, making it more difficult to ensure that new homes are built where they connect to training opportunities and local employment. **Gloucestershire can create a coordinated system where homes, learning hubs, and jobs are planned together.** There are strong examples to build on: in Gloucester, the University of Gloucestershire's City Campus Development is bringing new teaching and community space into the heart of the city, while the Forwards Employment Service[32] shows how employers, colleges, and community groups can collaborate to support residents into sustainable work. With LGR, these successes can be scaled across the county, **ensuring that talent is not only retained but is skilled to face the future, knowing their own is secure.**

Example benefits:

- **A Year 12 student in Highnam explores immersive career pathways at a local skills hub**, linking them to mentors in future-focused industries, such as cyber security, clean energy, advanced manufacturing, and engineering. These hubs make it easier for young people to see a future in Gloucestershire, rather than having to move away to build a career. In Gloucester, the University of Gloucestershire's new City Campus development strengthens this offer by providing teaching and community space in the heart of the city, connected to wider affordable housing and employment initiatives. Together, these projects make it easier for young people to see a future in the county rather than moving away. With LGR, this integrated approach to housing, education, and employment can be

[32] www.gloucestershire.gov.uk/health-and-social-care/disabilities/forwards-employment-service/

scaled across Gloucestershire, ensuring that all students - including those in rural areas - can access the same opportunities.

- **A mid-career learner in Winchcombe, a market town in Tewkesbury, retrains in low-carbon construction through flexible programmes**, improving their earning potential while supporting the transition to clean energy. Thanks to housing, public transport, and skills being planned together, they can study locally without facing long commutes or the insecurity of poor-quality rental housing. With stability at home, they are free to focus on building new skills and contributing to Gloucestershire's net zero economy.
- **A young mother in Cheltenham accesses a tailored learning pathway in sustainable construction and materials innovation**, supported by a family-friendly environment and counselling services at a local Family Hub. Over time, she develops expertise and becomes a mentor to others - showing how inclusive pathways strengthen both individual resilience and community cohesion. LGR makes this possible by coordinating housing, skills, and wraparound services under one framework – removing barriers so talent can both flourish and contribute.
- **A young family in Stroud secures affordable housing linked to training opportunities,** allowing them to pursue new careers without instability. Freed from the instability of high housing costs, they can take up retraining and new jobs without the stress of insecure tenancies or long journeys. This stability directly supports wellbeing and ensures Gloucestershire retains and grows its talent base by linking housing delivery with economic inclusion.

Ambition 6: Using data to transform transport and public services

LGR offers Gloucestershire the chance to bring together fragmented data from across multiple authorities and agencies. With devolved powers, this can be turned into usable intelligence that supports earlier intervention and ensures no one is left behind. This separation makes it harder to spot risks early or to design services that reflect real needs. Reorganisation would provide a framework for data use, allowing us to introduce a trusted, secure data infrastructure that can enable services to anticipate needs, respond in real time, and act preventatively.

Linking education, health, housing, transport, and social care data could improve safeguarding measures, reduce waiting times, and ensure fair provision across urban and rural areas. Open data initiatives and live mobility platforms will offer improved journey options, reduce congestion, and promote more sustainable travel choices.

The Robin demand-responsive bus service[33] shows how transport data can connect rural residents to jobs and services, but integration with housing and employment data would make it far more effective. Family hubs can link education, health, and social care data to improve safeguarding and ensure families access support at the right time. Flood management schemes in the Severn Vale already rely on environmental data to protect communities in real time. With LGR, these initiatives could be joined together, scaled across the county and embedded into **a trusted, secure data infrastructure that works for every resident.**

Example benefits:

- **Residents in flood-prone areas receive early warnings through live data platforms.** By combining real-time river levels with local emergency planning, households are given practical, trusted alerts that improve safety, reduce disruption, and protect lives. With devolved powers, these systems could be scaled across Gloucestershire to cover multiple risks, from flooding in the Severn Vale to wildfire risk in the Cotswolds.
- **A commuter in Frampton on Severn, a rural village in Stroud, uses a transport app with real-time data, reducing journey times and supporting sustainable travel.** Backed by devolved powers, the system can ensure affordable fares, reliable rural coverage, and accessible journey options. This also allows councils to use data on passenger demand and road conditions to prioritise road maintenance.
- **At a family hub in Gloucester, a family sits down with staff and views a joined-up record that brings together information from school and health services.** It shows that their child has had a recent dip in attendance and that the parents have both reported stress to their GP. The family are able to identify that they need extra learning support and access to parenting advice before the situation requires a more acute response. The hub uses the data infrastructure to coordinate the right support quickly, reducing pressure on the family and preventing escalation.
- **Farmers can access county-wide soil moisture and yield-forecasting data that helps them to adapt to dry weather conditions and protect arable production.** By bringing agricultural, environmental, and water data together under one system, it fills a current evidence gap and allows farmers to take preventative steps, boosting Gloucestershire's food security and the wider country's resilience to the impacts of climate change.

[33] www.gloucestershire.gov.uk/transport/the-robin/

Ambition in Action: Towards a Resilience-led Economy

The Golden Valley Development (GVD) is a nationally significant innovation powerhouse, **recognised by government as driving the UK's cyber and secure technology ambitions.** By bringing together industry, academia, and the public sector, GVD is advancing national security and resilience - supporting the UK's mission to embed resilience in critical supply chains infrastructure.

Anchoring Gloucestershire at the heart of the UK's resilience economy, and creating a ripple effect of prosperity across the South West and the nation, the GVD will support supply chains, jobs, and long-term competitiveness.

To unlock its full potential and deliver lasting benefits for local communities and the nation, **we are seeking Designated Area (DA) status for the GVD** - enabling Gloucestershire to retain 100% of business rates growth generated in this area, worth around £385.6m over the designation period. **This locally retained investment will accelerate infrastructure, boost investment, and drive a virtuous cycle of prosperity across the county and beyond.**

DA status means more funding for local infrastructure, skills, and public services - supporting our vision and ambitions for Gloucestershire. Nationally, it will help power UK growth, strengthen resilience, and spark prosperity and innovation across the country.

Summary

We have a bold vision for Gloucestershire - rooted in our heritage and driven by our innovation, shaped by the ambitions of our people, and designed to make every community ***smarter, greener, and fairer***. Through our six ambitions we have shown how services, places, and opportunities can be reimagined to meet the needs of today while preparing for tomorrow.

To bring this vision to life, we have developed a number of personas (see Appendix 1) that illustrate what our ambitions would mean in practice for residents and communities across Gloucestershire. These personas help ground our strategy in real experiences, making clear the tangible benefits of transformation.

The opportunities before us are clear: breakthrough innovation, inclusive digital access, thriving talent pipelines, stronger communities, wellbeing-focused growth, and data-enabled services. **Together they show how Gloucestershire can lead nationally and transform lives locally.**

We know what we need to do. LGR gives us the means to do it through simplifying structures, aligning priorities, and enabling decisions that connect ambition with delivery. With the right reform, Gloucestershire can bring its economic, social, and natural strengths together to create a future where every resident has the chance to succeed.

LGR will allow us to continue **building on what makes Gloucestershire great to create a sustainable place with thriving communities, bold ideas, and opportunities for everyone.**

Future Devolution

LGR is a key opportunity for Gloucestershire to reach its full strategic potential, locally and nationally. **As England moves towards wider regional governance, Gloucestershire is well-placed and eager to contribute.**

Our Economic Distinctiveness

Gloucestershire is notably resilient to economic shocks[34]. It has significant strengths in advanced manufacturing and engineering and food security innovation (a combined 23.7% GVA)[35] and is exceptional in the high-growth sectors that utilise emerging technologies[36]. **Our strongest sectors align closely with the priority sectors of the 2025 Industrial Strategy.** Gloucestershire's strong industrial roots in aerospace and engineering, combined with innovation driven by GCHQ, help it **outperform neighbouring areas in productivity, new business creation, and entrepreneurship**. We also host a skilled population, supported by strong universities, colleges, and research networks that have proactively reached out into regional networks.

Inherent to Gloucestershire is our natural capital. From the Cotswolds and Forest of Dean to the Severn Vale, Gloucestershire's landscapes give us the space and resources to lead on the challenges of the 21st century. As part of the Severn Estuary corridor, we can offer clean energy, sustainable food, water management, and climate adaptation. **Few places can match the combination of industrial heritage, high tech growth, and natural assets that define Gloucestershire's offer.**

Gloucestershire blends its landscapes, cultures, and economy into a unique identity that draws on west country heritage and lifestyle to inform future thinking. From the invention of the jet engine to pioneering hydrogen flights at Cotswold Airport[37]; from the Wheatstone Bridge to the Golden Valley; from being home to the invention of the lawnmower to hosting one of the deepest water research sites in the world in Tidenham[38], **our economy is a major asset for regional and national partners in the devolution context.**

Devolution is the key to realising this potential. With greater funding flexibility, joined-up services, and empowered local decision-making, **Gloucestershire can play its full role as a regional engine of growth at the crossroads of the South West, the Midlands, the South East, and Wales.**

[34] Economic Strategy Evidence base
[35] Regional gross value added (balanced) by industry, ONS
[36] Gloucestershire's Economic Strategy 2024–2034 Summary
[37] ZeroAvia completes initial Dornier 228 flight test campaign - Pilot
[38] DEEP - Engineering Wonder

Our Potential Devolution Partners

Gloucestershire is actively exploring three strategic partnerships to the north, south, and east[39]. We found each offer unique opportunities to accelerate growth and influence:

- West of England Combined Authority (WECA)
- Herefordshire and Worcestershire
- Swindon and Oxford

Our Devolution Option Analysis

A range of metrics were assessed against economic, legislative, cultural, and implementation criteria to identify which partnership could deliver the greatest impact in line with national devolution goals.

Option 1: West of England Combined Authority (WECA)

Geography and Governance

- Existing combined authority with metro mayor which is fully compliant with the Devolution and Community Empowerment Bill 2025 and December 2024 Devolution White Paper.
- Combined population (Gloucestershire + WECA *with North Somerset* rises above the minimum 1.5 million threshold guidance for strategic authority formation).

Strategic Authority Alignment

- Highest degree of alignment across the English Devolution Bill's seven statutory areas of competence, particularly health and care integration, transport and infrastructure, economic development, environment, and public safety.
- Pre-existing governance, transport corridors, NHS integration, and multi-agency delivery capacity provide a rapid implementation route.

Economic Geography Alignment

- Strong alignment in advanced manufacturing, digital/cyber, green technologies, and creative industries.
- Strong worker migration pattern across the borders.
- Potential to position Gloucestershire as an agri-tech leader within a wider innovation economy, offsetting WECA's urban focus.
- Gloucestershire may become a junior partner in the highest growth R&D sectors without a clearly defined role in bringing forward its strengths (e.g. agri-tech).

WECA holds the path to the most immediately deliverable option and offers the broadest alignment with national reform priorities and fastest route to full strategic authority status.

[39] Not an exhaustive list – three options were selected according to the shared length of boundary with Gloucestershire and consideration of whether agreements had been made for bordering counties to join alternative partners.

Option 2: Swindon and Oxfordshire

Geography and Governance

- No current combined authority membership so would require LGR and mayoral combined authority formation.
- Joint population threshold met with 1.6 million combined.

Strategic Authority Alignment

- High capability in economic development, skills, and net zero, but weaker in health, care, and integrated public service reform.
- Existing regional partnerships are largely informal or nascent.

Economic Alignment

- Significant longer-term potential in R&D partnerships (AI, life sciences, clean tech).
- Synergy in advanced manufacturing and cyber, but less alignment with agri-tech and rural economy; greater focus on life sciences than securing emerging technologies in the innovation sectors.
- Lower short-term economic integration due to weaker commuting links and business interdependencies.

Swindon and Oxfordshire offer strong innovation potential for the long term but would be slower to establish full statutory competencies with less immediate integration in health and rural sectors.

Option 3: Herefordshire and Worcestershire

Geography and Governance

- No current combined authority and therefore would require LGR and mayoral combined authority formation.
- Population slightly below the threshold so may require additional partners or special consideration.

Strategic and Policy Alignment

- Medium alignment across statutory competencies with strengths in environment, rural transport, and agri-tech, but limited in digital innovation and large-scale economic growth.
- Less alignment with national reform agenda’s focus on integrated care and high-growth sectors.

Economic Alignment

- Closest match in current rural economic strengths and historical cultural context.
- Gloucestershire would likely lead on scale and innovation, but partners offer limited capacity in high-growth digital and tech sectors.

Options Analysis Summary

1. West of England Combined Authority (WECA)

- **Why**: Existing governance, metro mayor, statutory compliance, strong sectoral fit (advanced manufacturing, cyber, green tech), and clear commuting / economic flows; existing regional partnerships across arts, culture, health, and the broadest range of services of all options; similar urban / rural profile, reflecting shared challenges in housing and transport planning.
- **Risk:** Gloucestershire risks becoming a junior partner unless it defines a distinctive role (e.g. agri-tech leader completing a 'whole of tech' future economy).
- WECA provides the high-growth innovation engine, Gloucestershire complements the ecosystem with agri-tech and natural capital.

2. Herefordshire and Worcestershire

- **Why:** Close match in rural economy, heritage, and agri-tech; natural cultural legacy fit; scope for Gloucestershire to play a leading role in innovation and scaling up; slightly under population threshold, but culturally congruent and offers Gloucestershire leadership space.
- **Risk:** Limited digital / tech capacity in partners and weaker alignment with national reform priorities.
- Rooted in shared rural economy and heritage, with Gloucestershire as a natural partner to inject innovation and scale.

3. Swindon and Oxfordshire

- **Why:** Strong in R&D, life sciences, AI, and clean tech; good synergies in advanced manufacturing and cyber, but requires completely new governance; has weaker cultural alignment, and less short-term integration with Gloucestershire's rural and health economies.
- **Risk:** Longer-time horizon to deliver; innovation is research-led and urban, less aligned with Gloucestershire's wider economic identity; very few established regional partnerships.
- Offers long-term potential in global-facing R&D and science but less immediate and less place-congruent.

Gloucestershire has the assets and ambition to contribute strongly within any of the potential partnerships. WECA provides the most immediately deliverable and policy-aligned option, while the Herefordshire and Worcestershire option offers an alternative in which Gloucestershire could play a leading role. The partnership with Swindon and Oxfordshire remains a credible longer-term prospect, particularly for research-led collaboration, but is less immediately aligned to Gloucestershire's wider economic and governance priorities.

Gloucestershire's Aims for Devolution

Through LGR and further devolution, Gloucestershire can unlock the tools to drive a high-growth, resilience-focused economy and smarter services for residents.

Devolution would allow Gloucestershire to:

- **Power growth through innovation:** using devolved economic powers to create the Severn Resilience Corridor, bringing together cyber, advanced manufacturing, agri-tech, and clean energy. This will attract major private investment, generate high-value jobs, and cement Gloucestershire's role as a national growth engine.
- **Strengthen resilience for the 21st century:** with greater control over housing, health, skills, and transport, Gloucestershire can deliver joined-up solutions for climate resilience, energy security, and sustainable food systems.
- **Put data to work for residents:** a county-wide data platform, anchored in Golden Valley's cyber infrastructure could integrate transport, housing, health, and utilities in real time. This will reduce duplication, cut costs, and provide residents with more personalised, responsive services, from flood alerts to smart mobility and integrated healthcare.

Summary

Gloucestershire's strengths in advanced manufacturing, securing emerging technologies, agri-tech, and clean energy, combined with our strategic location and cultural identity, position us as a valuable partner in building a balanced and high-growth regional economy. To achieve this potential, we are now seeking active cooperation from Government and regional partners.

	WECA	**Herefordshire and Worcestershire**	**Swindon and Oxfordshire**
Governance and Deliverability	• Existing combined authority with metro mayor • Fully compliant with Devolution Bill • Immediate path to strategic authority.	• Would require new mayoral combined authority • Population below threshold, may need extra partners.	• Would require new mayoral combined authority • Threshold met but no existing structures.
Strategic Alignment	• Highest alignment across all statutory areas: health / care integration, transport, economic development,	• Medium alignment: strong in environment, rural transport, and agri-tech; weaker in digital and national reform priorities.	• Strong in economic development, skills, and net zero; weaker in health and integrated public services.

	environment, and public safety.		
Economic Synergy	• Strong overlaps: advanced manufacturing, cyber, green tech, and creative industries • Clear commuter flows • Gloucestershire could specialise in agri-tech.	• Strongest rural economy and cultural fit • Gloucestershire likely to lead innovation • Partners weaker in high-growth sectors.	• High R&D and research potential: AI, life sciences, and clean tech • Lower commuting / business interdependencies • Less rural alignment.
Risks	• Gloucestershire may be junior partner in innovation without defined agri-tech/natural capital role.	• Weak tech / digital sector capacity • Weaker alignment with national reform.	• Long time horizon • Urban R&D focus less congruent with Gloucestershire's broader identity • Weak regional partnerships.
Overall Takeaway	• Most deliverable, innovation engine, culturally and economically aligned.	• Strong cultural / rural fit • Gloucestershire can lead • Weaker on growth / reform.	• Long-term R&D potential • Least deliverable in short term • Weaker identity fit.

Table 3: Strategic partnerships options analysis summary table

Options Analysis

Our options analysis is an objective assessment of the reorganisation options being explored for Gloucestershire[40]. Each option has been assessed using ministerial criteria, supplemented by local criteria, drawing on a range of both qualitative and quantitative evidence gathered throughout this proposal's development. Additionally, challenge and consensus sessions were held with council leaders and chief executives from across the seven councils.

This analysis provides some key considerations which should inform any overall conclusions. However, in the interests of objectivity and respect for the democratic process, the analysis does not provide a concluding recommendation of a preferred option.

The options analysis presented in this proposal mirrors that submitted for the two unitary authorities option.

All the analysis undertaken in this options analysis is subject to the policy decisions of whichever new authority / authorities are established as a result of LGR in Gloucestershire. This analysis is also contingent on the outcome of the national Fair Funding Review, which remains uncertain at this stage.

This analysis assumes there are no modifications to the boundary between East and West Gloucestershire. Should boundary modifications arise, the underpinning evidence – particularly the financial case and RAG ratings – would need to be revisited.

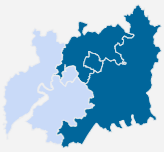
Option	Description	Geography		Population
Option 1: Single Unitary Authority (1UA)	**One new council delivering all local government services across Gloucestershire.**		Based on current **Gloucestershire County Council** boundary	**~ 659,276**
Option 2: Two Unitary Authorities (2UA – East and West)	**Two new councils: one for East Gloucestershire, one for West Gloucestershire. Each delivers all services within its area.**		**East:** currently **Cheltenham, Cotswold and Tewkesbury** districts	**~310,641**
			West: currently **Gloucester, Stroud and Forest of Dean** districts	**~348,635**

Table 4: Options analysis summary table

[40] Not including 'Greater Gloucester/Gloucester Unitary' which has not been subject to a shared process of development

Demographic and Economic Context

The following tables present a side-by-side comparison of key demographic, financial, and economic indicators for Gloucestershire as well as East and West Gloucestershire.

Population and Ageing Trends

The table below provides an overview of demographic patterns across Gloucestershire, East, and West, focusing on population size and age-related growth to inform future service planning and statutory obligations.

Measure	Glos.	East	West	Implications
Population (2024)	~659,276	~310,641	~ 348,635	The West has a larger population, which may affect baseline service volumes and statutory responsibilities.
Growth in 65+ population (2026–2030)[41]	+2.32%	+2.39%	+2.26%	Gloucestershire overall faces a challenge in relation to a population ageing faster than national averages, raising considerations around potential future supply for long-term care.
Growth in 0-19 population	Declining	Neutral	Declining	The West may see declining demand pressures on school places in the future.

Table 5: Demographic comparison

Financial Resilience and Income Base

This table compares financial indicators across the regions, offering insight into household income levels and the fiscal position of each area, to assess long-term financial sustainability.

Measure	Glos.	East	West	Implications
Gross disposable household	£23,527	£26,149	£21,191	Residents in the East have higher disposable income.

[41] Population projections, 2022, ONS

income per capita[42]				
Council debt per capita (2023/24)[43]	£819	£674	£948	The West would be created with a higher per-resident council debt burden*, potentially impacting its financial sustainability. **General fund not Housing Revenue Account (HRA)*
Net assets per individual[44]	£1,454	£1,810	£1,137	The East would hold significantly more assets per resident, offering greater long-term financial flexibility.

Table 6: Financial indicators comparison

Service Demand and Social Vulnerability

This table highlights variations in social care spending and indicators of vulnerability, helping to identify areas with greater baseline need and potential service demand.

Measure	Glos.	East	West	Implications
Adult social care spend per resident[45]	£522	£405	£629	Adult social care spend per resident would be significantly higher in the West.
Children's social care spend per resident[46]	£142	£129	£156	Children's social care spend per resident would be higher in the West.
Children in low-income families (per 100k)[47]	14,594	12,274	16,609	The West has a much higher rate of child poverty, potentially requiring it to provide more targeted early help and support.

[42] GDHI Per Capita, 2022/2023, Nomis
[43] LA Debt per capita, 2023/2024, GOV.UK
[44] Net Assets Per Capita, 2023/2024, District Councils
[45] ASC Spend per resident, 2024, Newton
[46] CSC spend per resident, 2025, Newton
[47] Children in Low Income Families per 100k, 23/24, DWP

Household benefit claim rate[48]	15.82%	13.8%	17.9%	The West has a larger proportion of residents reliant on benefits, potentially indicating higher baseline need.
Deprivation index score (higher = worse)[49]	15.1	12.7	17.2	Deprivation is significantly higher in the West, potentially driving greater demand on multiple services.

Table 7: Social care spending and indicators of vulnerability comparison

Economic Activity and Infrastructure

This table examines differences in employment, productivity and digital infrastructure, providing context for economic performance and access to opportunity.

Measure	Glos.	East	West	Implications
Job density (jobs per working-age person)[50]	0.9	1.0	0.8	The East has a more active labour market, potentially creating better access to employment and economic mobility.
Gross value added[51]	£39.0	£41.9	£35.7	Productivity is higher in the East, potentially reflecting a stronger economic base.
Business growth rate[52]	-0.1	+1.1%	–1.2%	The East has seen modest growth in its business base, while the West has experienced decline; this is likely to be localised to the Forest of Dean.
5G availability (% area covered)[53]	68.0%	58.1%	83.0%	The West outperforms the East in mobile coverage,

[48] Household benefit claim rate, 23/24, GOV.UK
[49] Deprivation, 19/20, MHCLG
[50] Job Density, 23/25, ONS
[51] GVA per hour worked, 22/23, ONS
[52] Business Growth (%), 23/24, ONS
[53] % of High Digital Connectivity, 24/25, OFCOM

				reflecting the larger rural footprint in the East.

Table 8: Employment and productivity comparison

Implications for Reorganisation

The baseline differences between East and West highlight demographic and economic imbalances that will shape the financial operating environment for either council that would be created in a two unitary authority scenario:

- A **single unitary authority (1UA) scenario** would need to manage these variations internally, redistributing resources and planning across areas with different levels of income, need, and growth.
- A **two unitary authority (2UA) scenario** would crystallise the variations between East and West, requiring each council to plan for its own financial and service challenges from vesting day, with a smaller scale of internal pooling of risk.

Criteria Analysed

This analysis is structured around nine criteria; these include six statutory criteria issued by the Ministry of Housing, Communities, and Local Government (MHCLG), and three additional criteria that reflect Gloucestershire's local priorities and values (criteria 7 to 9).

Each criterion has been broken down into sub-criteria to allow structured assessment across both models. We have assessed how 1UA and 2UA would potentially perform at the point of implementation and over time.

Only those elements of the published ministerial criteria which are relevant to a RAG (red, amber, green) rating and comparative analysis in Gloucestershire are included in the tables below. In most cases we have summarised the full text of the criteria.

KEY	**MHCLG criteria**	
	Gloucestershire-specific criteria	

1	**Sensible single tier of local government**	A) Establishes a single tier of local government for the whole of the area concerned

	This criterion assesses whether the model removes two-tier governance, creates a coherent single-tier structure, and reflects a logical financial and spatial footprint.	B) Sensible economic breakdown, with a tax base which does not create undue inequalities
		C) Sensible geographic breakdown, which will help increase housing supply and meet local needs
2	**Right-sized local government** This criterion assesses whether the model is large and resilient enough to deliver effective government. It considers population size, potential for efficiency, organisational capacity, and the complexity of transition.	A) A population of 500,000 or more (unless specific local factors make this unreasonable)
		B) Supports efficiencies and value for money for council taxpayers
		C) Improves capacity and supports the council to withstand financial shocks
		D) Manageable transition costs
3	**High quality, sustainable services** This criterion assesses whether the model supports effective, long-term service delivery. It considers integration, transformation potential, and the ability to improve outcomes in complex, high-need areas.	A) Improves local government and service delivery, avoiding unnecessary service fragmentation
		B) Opportunity for public service reform including where this will lead to improved value for money
		C) Improves delivery of, or mitigates risk of negative impact on, crucial services
4	**Meets local needs** This criterion assesses whether the model responds to the needs, identities, and priorities of local communities. It considers civic identity, community variation, and responsiveness to engagement.	A) Meets local needs and is informed by local views
		B) Improves / mitigates risk to issues of local identity, cultural, and historic importance
		C) Addresses local concerns
5	**Supports devolution arrangements** This criterion tests whether the model supports Gloucestershire's ability to unlock devolution powers and funding, and whether it creates a strategic authority footprint with appropriate population scale, coherence, and alignment to regional structures	A) Helps to support devolution arrangements / unlock devolution
		B) Sensible population size ratios between local authorities and any strategic authority

6	**Local engagement and empowerment** This criterion assesses whether the model can support stronger local democracy and provide practical tools for neighbourhood-level decision-making.	A) Enables stronger community engagement
		B) Delivers genuine opportunities for neighbourhood empowerment
7	**Environmental and climate protection** This criterion assesses whether the model strengthens the council's ability to lead on climate and environmental goals.	A) Ensures the new authority / authorities have clear capabilities to deliver existing and future climate and nature plans
		B) Reflects local priorities in areas with sensitive landscapes (e.g. Forest of Dean, Cotswolds AONB)
		C) Builds on existing commitments (e.g. Fairer Greener Forest, Climate Emergency responses)
8	**Civic engagement and participative democracy** This criterion assesses whether the model provides meaningful democratic representation at community level.	A) Promotes civic engagement and strengthens participative democracy
9	**Inclusive growth and equity** This criterion assesses whether the model enables inclusive economic development, supports vulnerable residents, and maintains service levels while pursuing financial sustainability.	A) Tackles disparities in wealth, employment, and service access
		B) Prioritises vulnerable residents and community-level regeneration
		C) Ensures that financial sustainability is not achieved at the expense of service levels

Each option has been consistently assessed against these nine criteria. RAG ratings have been used to summarise alignment and are supported by detailed commentary.

Scoring Method

To support comparison between the two options, this analysis uses a structured **Red–Amber–Green (RAG) rating system**.

The RAG system provides a simple, visual way to understand how well each option aligns with each criterion and sub-criterion.

Rating	Meaning
G	Meets the criteria

A	Partially meets the criteria / could meet the criteria, with mitigations
R	Does not meet the criteria

- Ratings are applied to each **sub-criterion.**
- No weighting is applied; all criteria are treated equally.
- Each rating is accompanied by narrative commentary, drawing on qualitative and quantitative evidence, if available.

Evidence Base

This analysis applies a structured, consistent approach to assess how well each reorganisation model aligns with the nine agreed criteria.

The analysis draws on a wide evidence base, as outlined below, bringing together quantitative analysis, professional insight, and stakeholder perspectives. Evidence has been applied consistently across both models to support an impartial and transparent comparison.

Phase 1 options analysis (completed as part of the interim plan submission in March 2025)

- Developed the original RAG scoring framework used in this analysis.
- Set out the early comparison of structural options based on feasibility, financial scale, and policy alignment.
- Established baseline assumptions around governance design, service footprint, and transition cost implications.
- Informed the scoring approach and structure of commentary.

Demographic and Economic Analysis

- Provided a detailed comparison between the proposed East and West Gloucestershire councils, across:
    - Population trends and age profiles.
    - Financial resilience (e.g. council tax base, gross disposable household income (GDHI), debt levels).
    - Demand for adult and children's social care.
    - Deprivation, employment, and digital access.
    - Economic activity and infrastructure.
- Highlights the different starting points for each authority under a 2UA model, and the internal variation that a 1UA model would need to manage.
- Forms the main statistical evidence base used throughout this options analysis.

Service-level disaggregation and aggregation discussions

- Provided detailed, operational insights from service leads across core upper and lower tier services including (but not limited to): adults, children's and education, transport, revenues and benefits, housing, leisure, and parking.
- Considered issues including:
    - Shared systems and data platforms (e.g. Liquidlogic, Capita, Uniform).
    - Workforce and statutory leadership duplication.
    - Locality delivery and place-based presence.
    - Contracting, service level agreements (SLAs), and external provider arrangements.
    - Gloucestershire-specific practical and technical issues

Stakeholder engagement feedback

- Reflective of responses from partners involved in local services and governance.
- Provided insight into perceptions of:
    - Strategic leadership.
    - Democratic representation and identity.
    - Integration of housing, care, and place-based services.
- Helped assess both models against criteria related to public engagement, identity, and local responsiveness.

Overall Summary of Options Analysis

Summary of Option 1: Single Unitary Authority (1UA)

This option would replace the current two-tier council system with one single council for all of Gloucestershire's ~659,000 residents. This is a size that's been successful in other areas like North Yorkshire and meets government guidelines. Having one council means **decisions can be made more quickly and clearly** and **the county can speak with one voice** when it comes to funding, transport, and big projects.

A 1UA maximises opportunities to retain existing county-wide systems and services (like core service case management systems), which **minimises the cost and disruption associated with splitting things up and any potential duplication.** This is especially important for services like adults' social care (ASC), children's social care, special educational needs and disabilities (SEND), and safeguarding, where **keeping teams and systems together helps protect and maximise service continuity for the most vulnerable people across the county.**

Local services would still be shaped around communities, in line with the proposed locality arrangements for Gloucestershire. This includes local partnerships and

boards, budgets that are managed locally, and retaining local identity through ward names, events, and branding.

There are differences between the east and west of the county, e.g. in income levels, spending on adult social care, and levels of deprivation. With 1UA, **financial resources are pooled and can be shared and targeted where they're needed most**, increasing overall financial resilience (noting there are still unknowns around the dedicated schools grant deficit and fair funding review which impact all LGR options being considered).

The main risk is around ensuring that local voices are heard from the start – this can be managed by setting up strong local governance early on.

Summary of Option 2: Two Unitary Authorities (2UA)

The 2UA model **prioritises local visibility, civic identity, and flexibility** by creating two councils based on existing district clusters: East (~310k) and West (~348k). Smaller footprints (in comparison with a 1UA) may make members and officers seem more accessible, which some stakeholders, especially parish councils, may see as a strength.

However, the model introduces significant **duplication and disaggregation challenges**. Systems like Liquidlogic, SAP, and Capita One would need to be split or reprocured; safeguarding boards, SEND services, and commissioning frameworks would require parallel governance. Service leads warned this could increase cost, slow transformation, and risk divergence in quality or access. The fire and rescue service in a 2UA model would be legally required to disaggregate from local authority structures and finances, creating additional cost and risk.

The West's higher demand (particularly in relation to social care services) and lower income could constrain its investment capacity without sustained external funding and there may be concerns around longer-term financial sustainability for the West UA (with current estimates projecting a c.£21.9m deficit on day one).

Like the 1UA, local services would still be shaped around communities, in line with the proposed locality arrangements. This includes local partnerships and boards, budgets that are managed locally, and keeping local identity through ward names, events, and branding.

Comparative (RAG) scoring summary by **main criteria**

Criteria	1UA	2UA
1. Sensible single tier of	• Creates a single tier of local government.	• Creates a single tier of local government.

local government	• Enables pooled resources and redistribution to address potential imbalances countywide, e.g. in homelessness and housing supply. • Aligns with existing partner boundaries.	• Similar tax bases across both UAs but potential fiscal disparities in LA debt (£ per capita (23/24) of £948 in West compared to £674 in East) and service cost (ASC spend per resident of £405 in East vs £629 in West).
2. Right-sized local government	• Exceeds MHCLG expected population threshold of 500,000 (1UA population is ~659,000). • Economies of scale across a single larger UA. • Improved capacity and resilience (financial and workforce). • Lower transition costs (one-off costs ~£21.3 million).	• Meets viability threshold of 300k but below 500k (East: ~315,349, West: ~354,031). • Reduced duplication across lower tier services; duplication of upper tier services. • Opportunities to put in place targeted shared service arrangements. • Higher transition costs (with two programmes, one-off cost ~£30.1 million).
3. High quality, sustainable services	• Maintains integrated ASC, CSC, and public health. • Innovation opportunities at scale. • Protects multi-agency safeguarding and Multi-Agency Safeguarding Hub (MASH) arrangements.	• May fragment countywide services which could cause challenges with quality and cost of service delivery e.g. ASC, CSC, public health etc. • Fire and rescue will need to move to a non-local authority governance, financial, and service arrangement (i.e. the creation of an independent fire and rescue authority), which will incur additional costs (estimated to be c.£2.8m net total additional pressure for year one) and may increase risk of sustainable service provision.
4. Meets local needs	• Local stakeholder support for retaining single voice and shared infrastructure. • Concerns around merging distinct local identities. • Perception of overcentralisation, which can be	• Builds on existing district boundaries. • Retains a sense of place identity for the two largest urban centres (Cheltenham and Gloucester) but could risk alienating other more rural areas.

	managed with continued place-based delivery.	• Risks financial imbalance in West which could compromise ability to meet local needs.
5. Supports devolution arrangements	• Simplifies engagement with partners. • Increased scale and negotiating influence. • Meets 1.5m Combined Authority (CA) population benchmarks.	• Allows tailored devolution asks. • Each UA could join different CAs. • Some scenarios risk falling below 1.5m population benchmark.
6. Local engagement and empowerment	• Can deliver countywide engagement structures. • Embeds neighbourhood partnerships consistently. • Needs deliberate design to avoid remoteness.	• Smaller footprints could improve councillor visibility. • As for 1UA, effective engagement depends on deliberate design.
7. Environmental and climate protection	• Countywide environmental plans, but with the ability to still retain tailored, local strategies where needed. • Unified stewardship of landscapes. • Scales up local climate initiatives.	• Ability to still retain tailored, local strategies where needed. • Retain joint governance for shared assets.
8. Civic engagement and participative democracy	• Scales up digital tools and participatory decision-making countywide. • Risk of democratic deficit.	• Two smaller councils could feel more accessible, with closer member-resident link in comparison with a 1UA. • Risk of democratic deficit.
9. Inclusive growth and equity	• Increased countywide resilience to drive growth and equity. • Unified regeneration. • Consolidation savings can be reinvested back into front line service delivery.	• Potential risk or difficult decisions needed in the West if current demand and cost trajectories for ASC continue.

Summary of Options Appraisal Against Criteria and Sub-Criteria

This section sets out a summary view of the options appraisal against the six MHCLG criteria and three additional local context criteria and sub-criteria, with ratings in RAG format providing a simple, visual way to understand how well each

option aligns with each criterion and sub-criterion. A more detailed description against each sub-criteria can be found in Appendix 5: Detailed Options Analysis.

When assessing each option against the MHCLG criteria, we note that the potential impact of the government's fair funding review remains unknown. This creates a degree of uncertainty for both options, as future funding allocations could materially affect relative financial sustainability and capacity. As a result, no definitive assessment of fair funding implications has been included within the criteria analysis for either the 1UA or 2UA option.

This options analysis has been prepared based on the current Gloucestershire boundaries. No boundary changes have been proposed or modelled at this stage. Any suggested boundary modification could significantly alter population totals and financial profiles, which in turn would affect assessment against several criteria and may change the RAG ratings presented.

Comparative (RAG) Scoring Summary by **Main Criteria and Sub-Criteria**

Criterion	Sub-criterion	1UA		2UA (East / West)	
1. Sensible single tier of local government	A) Establishes a single tier of local government for the whole of the area concerned	**G**	• Removes two-tier structure and creates one accountable body.	**G**	• Removes two-tier structure and creates two accountable bodies in a single tier.
	B) Sensible economic breakdown, with a tax base which does not create undue inequalities	**G**	• Allows pooled resources and supports appropriate redistribution from East to West.	**A**	• 2024 tax base (band D equivalents after council tax support) suggest similar tax bases across both authorities (49% in the West and 51% in the East) with clear sectoral priorities to drive economic growth within each UA. • However, there are potential fiscal disparities in LA debt (£ per capita (23/24) of £948 in West compared to £674 in East) and service costs, particularly in ASC (spend per resident of £405 in the East vs £629 in the West).
	C) Sensible geographic breakdown, which will help increase housing	**G**	• Aligns with existing partner geographies e.g. NHS, ICB, police etc and enables strategic planning to address disparities in housing needs and land supply across different parts of the county (five-year housing supply	**A**	• Misalignment of boundaries with key partners incl. the ICB, police, and fire and rescue. • Variations in homelessness (higher in the West at 0.21% vs 0.11% in the East) and

Criterion	Sub-criterion	1UA		2UA (East / West)	
	supply and meet local needs		target is 4.97 years for East and 3.83 years for West, with a countywide shortfall of 4.37 years).		housing land supply (lower in the West at 3.83 vs 4.97 in East). This could result in more demand for housing in the West with less supply to meet this efficiently within the new UA borders. • Average house prices illustrate that the private housing market faces greater challenges in the West, where values are lower (e.g. Gloucester £225,000; Forest of Dean £291,000) compared to the East (e.g. Cotswolds £419,000; Cheltenham £324,000), reducing profit margins and making it less likely that the private sector will deliver sufficient supply without public intervention.
2. Right-sized local government	A) A population of 500,000 or more (unless specific local factors make this unreasonable)	**G**	• Serves ~659,000 people, meeting MHCLG's expected population threshold of 500,000.	**A**	• Both councils exceed 300,000 (minimum viability threshold is met) but fall below the MHCLG preferred 500,000 (East: ~315,349, West: ~354,031).
	B) Supports efficiencies and value for money for council taxpayers	**G**	• Opportunities for economies of scale e.g. across smaller specialist contracts for services such as cyber and asbestos and	**A**	• Reduced duplication of lower tier services and improved coordination between areas such as transport, housing, and regeneration.

Criterion	Sub-criterion	1UA		2UA (East / West)	
			increased market influence to enable market management. • Delivery of potential net revenue savings from reorganisation of ~£21.1m per annum.		• However, duplication of countywide service infrastructure e.g. two statutory officers for CSC, two core systems for CSC etc will add in additional costs. • Delivery of potential net revenue savings from reorganisation of ~£10.7m per annum (split as ~ £4.9m for the East, and ~ £5.8m for the West).
	C) Improves capacity and supports the council to withstand financial shocks	**G**	• Enables pooling of specialist professional resource to allow for flexible deployment across the county. • Improves financial resilience to manage imbalances in demand and cost between different areas in the county. • Services like ASC and CSC are preserved in their current state with senior capacity maintained and increased workforce resilience. • Current financial analysis indicates that a 1UA for Gloucestershire would be established with a balanced budget on day one. This assumes the full delivery of unidentified savings required by all seven councils between now and vesting day (1	**A**	• Opportunities to continue operating shared service arrangements in a targeted way to drive efficiencies and provide an increased number of senior officers, potentially resulting in increased capacity. • However, potential significant financial burdens for the West in relation to ASC (around the demand and cost of working age adult placements). • Current financial analysis indicates that the East council in a 2UA scenario would be established with a day one general fund surplus of ~ £21.9m. Whilst a West council would be established with a day one general fund deficit of ~ £21.9m. This assumes the full delivery of unidentified

Criterion	Sub-criterion	1UA		2UA (East / West)	
			April 2028) and does not fully account for the impact of the fair funding review (subject to further detail from government).		savings required by all seven councils between now and vesting day (1 April 2028) and does not fully account for the impact of the fair funding review (subject to further detail from government).
	D) Manageable transition costs	**G**	• Requires creation of only one new authority and legal structure, minimising transition costs - estimated to be ~£21.3m. (Based on the assumption of a continuing authority). • This includes lower costs of systems migration e.g. no need to split out or duplicate existing countywide systems such as Liquidlogic; lower costs of statutory senior officer roles as only one set of roles is required; lower costs of setting up two separate implementation portfolios to manage transition etc.	**A**	• Higher transition costs as governance and activities would need to be undertaken twice – currently estimated at ~ £30.1m. • Specific examples of additional costs incurred include the recruitment of two sets of statutory officer roles, the increased costs of disaggregation of core county wide services and systems, the costs of setting up two shadow authority structures.
3. High quality, sustainable services	A) Improves local government and service delivery, avoiding unnecessary service fragmentation	**G**	• Preserves current integrated delivery in ASC, CSC, transport, and public health. • Also results in minimal disruption to current multi-agency partnership arrangements. • There may be challenges in delivering quality services across such a diverse	**A**	• Opportunities to potentially strengthen local partnerships with organisations within each area. • Services that require aggregation will have a simpler journey as East / West will each aggregate from three districts into one.

Criterion	Sub-criterion	1UA		2UA (East / West)	
			geography, but continued strong locality working can help to mitigate this. • This involves the aggregation of six councils into 1UA, which is likely to be complex and costly e.g. alignment of different policies etc.		• However, a 2UA will result in the likely disaggregation of core countywide services including ASC, CSC, education, transport, public health, trading standards, and libraries which could result in financial viability considerations (e.g. in ASC given the imbalance in demand and cost) as well as variations in service delivery and offer (e.g. in relation to public health services). • Under the provisions in the Fire and Rescue Services Act 2004, fire and rescue will need to move to non-local authority governance, financial, and service arrangement (i.e. the creation of an independent fire and rescue authority), which will incur additional net costs (estimated to be c.£2.8m additional pressures on day one for the new councils) and may increase risk to sustainable service provision.
	B) Opportunity for public service reform, including instances where this will lead to	**G**	• A larger organisation will have increased scale, resilience, and influence in working with local and national partners, driving longer-term improvements including the creation of a single trusted front door for	**A**	• Enables each council to innovate locally and make targeted investments in line with local priorities with greater agility and easier implementation, but at a potentially

Criterion	Sub-criterion	1UA		2UA (East / West)	
	improved value for money		residents, a single data platform to drive prevention and early intervention, and the ability to innovate at scale quickly. • For example, in areas like health and social care, a single larger organisation is likely to have a stronger voice and influence as part of the ICB in comparison with smaller organisations.		reduced scale compared to countywide delivery.
	C) Improves delivery of, or mitigates risk to, negative impact on crucial services	**G**	• Allows flexible resource allocation across the county, directing investment to areas of highest demand such as ASC and CSC in the West. • Consistent service standards for countywide functions. • Preserves MASH arrangements and avoids artificial borders that could disrupt education and care placements.	**A**	• Disaggregating core services such as education, SEND, admissions, and safeguarding systems risks disrupting end-to-end care pathways, hospital discharge, and home-to-school transport.
4. Meets local needs	A) Meets local needs and is informed by local views	**A**	• Findings from local engagement undertaken with Gloucestershire residents in July 2025 indicated that 205 out of 225 residents (who had a view on local government structures) preferred a 1UA for Gloucestershire.	**A**	• Findings from local engagement undertaken with Gloucestershire residents indicated that 14 out of 225 residents (who had a view on local government structures) preferred a 2UA model. However, concerns were raised in broader qualitative

Criterion	Sub-criterion	1UA		2UA (East / West)	
			• Parts of the county's strategic partner base (NHS, police, business networks) and the VCFSE emphasised that a single accountable body could also simplify engagement and reduce duplication across multiple districts. However, some parish councils and VCFSE groups raised concerns that this needs to be supported by robust locality governance so that a 1UA does not feel more distant, especially in rural areas. • The 1UA model reflects existing countywide delivery of ASC, CSC, public health and transport, noting that service leads supported retaining local operational footprints even under this arrangement.		commentary around fairness, division, and efficiency, with references to "creating a rich side and a poor side of the county". • Concerns were raised around large urban centres within each unitary dominating focus and resources, potentially leading to rural areas receiving a lower standard of service. • Risks include fragmentation where communities span boundaries or rely on countywide networks (e.g. education, safeguarding, housing). • Parts of the VCFSE warned that splitting the county may marginalise rural transition areas such as the Severn Vale and North Cotswolds.
	B) Improves / mitigates risk to issues of local identity, cultural and historic importance	**A**	• Civic identity kept through 267 parish councils, new city / town councils for Gloucester and Cheltenham, and use of local names and branding. • Neighbourhood partnerships (30k–50k population) bring decision-making closer to communities and build on existing local networks.	**A**	• Aligns with current district geographies. • Equalities impact assessment (EqIA) analysis shows differing community profiles: East combines Cheltenham's urban diversity with older rural areas, while West combines Gloucester's ethnic diversity with rural Forest of Dean and Stroud communities.

Criterion	Sub-criterion	1UA		2UA (East / West)	
			• Area-based practice in ASC / CSC and precedents from other unitaries show local visibility can be maintained under a 1UA model. • Local engagement with residents raised concerns that a unitary authority may not recognise the individual places that have their own unique identity. For example, residents spoken to at the Coleford Music Festival wanted to maintain the identity of the Forest of Dean as a unique place.		• However, several stakeholders noted that smaller authorities don't necessarily directly correlate with improved community engagement – the underlying structures and design are crucial to success. • Findings from local engagement with residents also highlighted that it could be difficult to create local identities for each unitary that do not revolve around the largest towns which would exclude other areas.
	C) Addresses local concerns	**A**	• Risk of overcentralisation can be mitigated by strong locality governance and retaining local delivery (e.g. social work teams). • A 1UA enables countywide planning to address inequalities (e.g. child poverty, which is higher in West) while flexibly allocating resources by place. • Unified capital and housing functions allow targeted investment in local priorities, such as brownfield regeneration in the West and transport access in the East.	**A**	• The West faces greater cost pressures due to higher deprivation (indices of deprivation - East: 12.71, West: 17.16); higher ASC costs per resident (East: £405, West: £629); and higher claimant rates (East: 13.79%, West: 17.87%). • Cross-boundary issues (e.g. housing, transport, tech corridors, flood risk) require joint working, limiting full localisation. • Unified capital and housing functions allow targeted investment in local priorities, from brownfield regeneration in the West to transport access in the East.

Criterion	Sub-criterion	1UA		2UA (East / West)	
5. Supports devolution arrangements	A) Helps to support devolution arrangements / unlock devolution	**G**	• Gives Gloucestershire a single, unified voice in national negotiations. • Streamlined governance and one point of entry improve clarity for partners and enhance the county's profile when securing investment and funding. • Unified leadership supports countywide priorities such as housing, infrastructure, skills, and transport, while preserving links to both the South West and West Midlands regional partnerships.	**A**	• No single voice for Gloucestershire overall which could weaken influence in negotiations but there may be improved opportunities for each authority to tailor devolution asks based on distinct priorities. However, there is limited evidence to support this.

	B) Sensible population size ratios between local authorities and any strategic authority	**G**	• Population sizes for potential combined authority options being considered for Gloucestershire just about meet the minimum 1.5m benchmark set by government as illustrated by the combined population estimates below:
			  ○ Gloucestershire + WECA Core: 1.6m
			  ○ Gloucestershire + WECA (incl. North Somerset): 1.81m
			  ○ Gloucestershire, Herefordshire and Worcestershire: 1.45m (falls a little short of the 1.5m threshold).
				G	• Opportunities for each UA to join potentially different combined authorities due to potential political divergence.
					• Two smaller Gloucestershire authorities would cause concerns around meeting the minimum 1.5m benchmark in all potential combined authority scenarios, e.g. Herefordshire and Worcestershire have a combined population of c.806,000 so if only one of the Gloucestershire authorities was to form a combined authority with these two areas, this would fall short of the minimum

Criterion	Sub-criterion	1UA		2UA (East / West)	
			○ Gloucestershire, Oxfordshire + Swindon: 1.63m • However, concerns were noted around the relative size of a single Gloucestershire unitary authority in comparison with other partners in a combined authority. For example, in the case of a WECA option, Gloucestershire would be the largest partner in WECA, with a population of c. 659,276, compared to Bristol's c.472,400, South Gloucestershire's c.290,400 and Bath and North East Somerset's c.193,400 (population figures based on ONS 2021 census). This could potentially make a single unitary less appealing for other partners.		1.5 million threshold (at a maximum, it would be c.1.2m). • In terms of relative size of two smaller Gloucestershire authorities compared with potential partners, this may be more palatable. The populations of c.300,000-350,000 for Gloucestershire would not be significantly higher than potential partners, particularly in the case of a WECA option.
6. Local engagement and empowerment	A) Enables stronger community engagement	**G**	• A 1UA removes districts but can create countywide frameworks for neighbourhood partnerships, reducing duplication and clarifying responsibilities. • Effective engagement depends on deliberate design; partners stressed the need to "build in real localism" to avoid perceptions of distance.	**G**	• Smaller footprints could improve councillor visibility and allow warding and committees to reflect local settlement patterns. • Effective engagement depends on deliberate design; partners stressed the need to "build in real localism" to avoid perceptions of distance.

Criterion	Sub-criterion	1UA		2UA (East / West)	
			• The 1UA model generates the largest potential reorganisation savings (c.£21.1m annual net savings), creating capacity to invest in local forums co-designed with partners including the Office of the Police and Crime Commissioner (OPCC), ICB, and the VCS Alliance.		• Service leads stressed that effective engagement depends on design, resources, and authority, not size alone.
	B) Delivers genuine opportunities for neighbourhood empowerment	**G**	• A 1UA can formalise locality governance through neighbourhood partnerships and area committees, co-designed with communities and partners – noting it may be difficult on such a large footprint (OPCC, ICB, VCS Alliance). • Existing hubs and parish clusters can be aligned to locality areas, ensuring services like ASC, CSC, and planning remain close to residents, while using shared systems and standards countywide. • Concerns have been raised that removing levels of government risks democratic deficit.	**G**	• A 1UA can formalise locality governance through neighbourhood partnerships and area committees, co-designed with communities and partners – noting it may be difficult on such a large footprint (OPCC, ICB, VCS Alliance). • Concerns have been raised that removing levels of government risks democratic deficit.
7. Environmen	A) Ensures the new authority has /	**G**	• Countywide plans and partnerships on climate, nature recovery, and flood risk (e.g.	**G**	• Strategic collaboration could continue through Climate Leadership

Criterion	Sub-criterion	1UA		2UA (East / West)	
tal and climate protection	authorities have clear capabilities to deliver existing and future climate and nature plans		Climate Strategy, Local Nature Recovery Strategy (LNRS), Lead Local Flood Authority (LLFA) role) continue seamlessly under a 1UA. • Scale enables coordinated budgets, specialist teams, and single ownership of assessments and bids, strengthening capacity for investment and delivery. • Neighbourhood partnerships embed environmental priorities locally, supporting community-led climate and nature actions.		Gloucestershire, but duplication of plans and scrutiny would add cost. • Requires countywide coordination on cross-boundary issues (which can continue to build on the success of partnerships such as Climate Leadership Gloucestershire). • The smaller scale of two unitary authorities should not have an adverse impact on the effectiveness.
	B) Reflects local priorities in areas with sensitive landscapes (e.g. Forest of Dean, Cotswolds AONB).	**G**	• Maintains single local plan, LNRS, and biodiversity net gain framework, avoiding fragmented policies across natural assets and landscapes. • Supports countywide coordination of infrastructure, flood schemes, and biodiversity corridors while retaining local tailoring through the proposed locality arrangements. • Provides consistent planning approach on issues like nutrient neutrality, with parish and community networks shaping local priorities.	**G**	• Local initiatives such as Cheltenham's Net Zero Plan and Fairer Greener Forest could be advanced under separate leadership.

Criterion	Sub-criterion	1UA		2UA (East / West)	
	C) Builds on existing commitments (e.g. "Fairer Greener Forest", Climate Emergency responses).	G	• Local climate programmes (e.g. Fairer Greener Forest, Stroud Climate Action Network (CAN), Cheltenham net zero) can continue with countywide support, funding and systems. • A 1UA enables one climate plan, shared datasets, and a single scrutiny framework to align priorities and track delivery. • Some partners highlighted through engagement that 1UA simplifies collaboration, supporting targeted investment in rural, urban, and flood-risk communities.	G	• Two councils could retain and develop existing local climate plans, keeping accountability close to members and communities. • Local ownership may strengthen engagement, but alignment is needed on countywide priorities like emissions, transport decarbonisation, and biodiversity.
8. Civic engagement and participative democracy	A) Promotes civic engagement and strengthens participative democracy	A	• Countywide engagement tools and resident panels can be delivered at scale, avoiding duplication across districts. • A single framework protects equal access to participation for both rural parishes and urban neighbourhoods. • Builds on local co-design pilots and VCFSE partnerships, enabling grassroots leadership within a countywide democratic structure.	A	• Both authorities would be able to develop civic engagement strategies suited to their geographies and communities. • Smaller councils could feel more accessible to residents, with closer member–resident links. • Given LGR will reduce the number of elected councillors and create larger electoral divisions, this will increase the number of residents each councillor

Criterion	Sub-criterion	1UA		2UA (East / West)	
			• Given LGR will reduce the number of elected councillors and create larger electoral divisions, this will increase the number of residents each councillor represents. This could risk a democratic deficit.		represents. This could risk a democratic deficit.
9. Inclusive growth and equity	A) Ability to tackle disparities in wealth setting up one unitary authority or two unitary authorities	**G**	• A 1UA enables countywide planning and pooled resources to tackle disparities, targeting regeneration in areas with lower GDHI, job density, and higher deprivation (notably in the West). • Avoids postcode inequality by ensuring consistent access to services and funding across the county. • Strengthens Gloucestershire's case for levelling up and national investment by presenting one accountable body.	**A**	• Lack of countywide redistribution may leave the West struggling with higher deprivation (East: 12.71, West: 17.16) and demand pressures (e.g. ASC costs per resident East: £405, West: £629 and Adults with no qualifications East: 13,375 per 100,000, West: 16,169 per 100,000). • Risks include divergence in neighbourhood regeneration and reduced ability to deliver countywide programmes to close equalities gaps.
	B) Prioritises vulnerable residents and community-level regeneration	**G**	• Shared datasets enable consistent targeting of unmet need (e.g. higher child poverty rates in the West). • Countywide safeguarding boards and integrated commissioning are retained, while services continue to deliver locally	**G**	• The West may face difficulty funding high-need regeneration without redistribution, exposing resource and commissioning gaps. However, funding may become more readily available to the West as their relative deprivation would no longer be

Criterion	Sub-criterion	1UA		2UA (East / West)	
			through hubs, schools, and VCSFE partners. • A 1UA simplifies cross-cutting delivery (e.g. mental health, housing, substance misuse) and links neighbourhood action plans to countywide priorities.		hidden by the averages of the West and East combined.
	C) Ability to balance financial sustainability with service levels	**A**	• Consolidation of contracts, systems, and infrastructure delivers savings in back-office functions, allowing reinvestment in frontline and preventative services. • A single commissioning function strengthens market position in areas such as ASC and SEND, reducing fragmentation and securing better value. • Countywide reserves and income provide flexibility to sustain high-cost services and manage financial risk across the whole area. • Countywide dedicated schools grant (DSG) deficit projected to reach ~£234m by vesting day (1 April 2028). If statutory override is not maintained or an alternative solution implemented, then both a 1UA and 2UA would face significant financial risks.	**A**	• Each authority would have its own independent medium term financial strategy (MTFS) and budgets which can be aligned with local service priorities. • The West faces higher ASC demand and costs (ASC costs per resident East: £405, West: £629) and CSC costs (CSC costs per resident East: £129, West: £156), creating greater budget pressure without access to countywide reserves or subsidy. • Countywide DSG deficit projected to reach ~£234m by vesting day (1 April 2028). If statutory override is not maintained or an alternative solution implemented, then both a 1UA and 2UA would face significant financial risks. • The impact of the fair funding is currently unknown, presenting further financial

Criterion	Sub-criterion	1UA	2UA (East / West)
		• The impact of the fair funding review is currently, presenting further financial uncertainty to both 1UA and 2UA scenarios.	uncertainty to both 1UA and 2UA scenarios.

The New Council: Future Operating Model

LGR is a chance to reshape how councils in Gloucestershire work. To deliver better, more sustainable services and tackle inequalities, **a clear and consistent future operating model (FOM) is essential.**

This section outlines how the new council could engage with residents, collaborate with partners, and operate internally. While the final model will be decided by future council leaders, this proposal offers **a framework to support long-term resilience, local decision-making, and community-focused service delivery.**

Our Opportunity to Modernise

Gloucestershire is in a unique position – ready to harness its strengths whilst fundamentally transforming to address some its challenges, ultimately improving outcomes and delivery of high-quality services for all residents, businesses, and staff.

Through LGR, the new council can take advantage of:

- **Simplified access to services making it easier for residents to get the help they need** without having to be passed between councils.
- **A strategic approach to prevention and integration** across social care, public health, environmental health, leisure, housing, and other services. Given Gloucestershire's higher than average ageing population, this approach is key to future demand management and financial sustainability.
- **Opportunities to partner with local organisations.** Gloucestershire already has great foundations to build on – like our place-based family and youth hubs across the county and the Ow Bist Community Hub[54] in Cinderford. Ow Bist is a great example due to its co-designed ethos; the community named the building and shaped its offer, which blends council, health, and VCFSE services.
- Accelerated opportunities for transformation enabled by **shared intelligence and predictive analytics**. Housing and homelessness are an example of how a more integrated operating model can enable more evidence-driven and predictive responses for vulnerable people.
- **Fresh impetus for broader public service reform across Gloucestershire** to address service modernisation, integration, prevention, and demand pressures**.**

[54] www.fvaf.org.uk/owbist

Our Design Principles

We've set out clear design principles to guide every decision behind our FOM:

- **Values-led:** everything we do will be rooted in clear values and led by outcomes – **doing the right thing for the people of Gloucestershire.**

- **People at the heart:** we're here for all our people, businesses, and communities – everyone is equally valued. We design with people, not for the, **building relationships rooted in listening, trust, transparency, and inclusivity.** Our ambition is to create places and services that actively support wellbeing and happiness, helping everyone to thrive.

- **Locality-focused:** our commitment to localities means **real place-based working, genuine co-production, and enabling community-led delivery.** One size won't fit all, and we will support different places in different ways.

- **Online by default and accessible for all:** our strategic 'online by default' culture maximises the impact of technology, simplifying and automating our processes, with alternative provision where it is desired or needed, so that **nobody is left behind**. And as we innovate, we stay mindful of the environmental and ethical impact of our digital choices.

- **Collective ownership:** we'll drive collective ownership throughout the new council with a **'one-team ethos'**. This empowers service leads, managers, and staff to make smart, local decisions and adapt quickly to what our communities need most.

- **Partnerships with purpose:** our **partnership working will be purposeful** to make a positive difference to our communities and achieve shared goals. Every delivery model is shaped by what works best for each place, not by a one-size-fits-all approach.

- **Intelligence led decision-making:** we will harness evidence to spot things early, be proactive, influence strategy, and drive meaningful change, using data and insights to improve service delivery and ways of working.

- **A great place to work:** we'll value, train, and care for an agile and resilient workforce, building clear career pathways and enabling development of specialist service experts, multi-skilled individuals, and those that want to move between service areas. We champion **a diverse and inclusive workforce that reflects our communities**, promoting equality, equity, and belonging for all.

Key Components of our FOM

With our design principles as our foundation, we're clear about what this means in practice.

Two-way engagement and a first point of contact for residents, businesses, and the community

- Fostering participation and co-creation with neighbourhoods and other communities to encourage genuine partnership working and empowerment; exploring investment in community assets, libraries, and outreach to support place-based access and digital inclusion.
- Wherever possible, ensuring that services feel consistent and connected, powered by shared customer data, especially for those with complex or multiple needs.
- Blending digital self-service and effective triage (enabled by AI, including voice and chat automation) to free up our people to provide higher value, personal services.
- Utilising resident and community demand data and insights to feed neighbourhood and community support, commissioning, and corporate planning, which will allow the council to use data to drive decisions and improvements.

Bringing together frontline and place-based service delivery for residents, businesses, and communities

- High-risk, regulated, and a range of other services are likely to stay in-house (or potentially even be brought in house) to protect quality, value, and flexibility.
- A workforce that blends specialist staff, who understand the technical nuance and risks of frontline services, with flexible, multi-skilled staff, who can provide challenge and strong leadership.
- Visible and responsive services in local areas through place-based forums and outreach which adapts to diverse populations and cultural needs.
- A seamless flow of contact, triage, and resolution into operational teams – with clear service standards and safeguarded pathways for urgent or high-risk cases.

Commissioning in-house specialist capabilities associated with services the council acquires externally

- Strategic commissioning capabilities to link insight, market knowledge, service needs, and outcomes (aligned to the corporate strategy and community needs).
- Lead with intelligence – using demand, neighbourhoods, and supply insights to drive every decision so that they are outcomes-focused and needs-based.
- Joint working with partners built on trust and shared goals (not necessarily always full-service integration), enabled by strong governance and clear exit strategies.
- An ethos of continuous review and improvement, making sure services remain resident-focused and outcome-driven, encouraging maximum value for money.

Note: An initial view of potential delivery models for core service areas (i.e. commissioned, shared services, in-house) is set out in Appendix 6: Proposed Service Delivery Models (noting that ultimately the final decisions on these will be for the new authority).

Strategic enablement: driving the council's strategic direction, transformation agenda, and operational excellence

The new council will need a strategic enablement capability to lead direction, retain decision-making sovereignty, and deliver on its political and strategic priorities. This will help drive:

- Coordination of corporate strategy, transformation, and financial performance to ensure alignment and accountability across the council.
- A robust business partnering model turning strategy into action. Central teams will manage systems, standards, and high-volume transactions, with business partners embedded within or alongside directorates.
- Insight and performance information will flow both ways between services and strategic leadership, enabling real-time learning, smarter resource use, and targeted interventions.
- Investment in the right tools, skills, and culture, pairing data with human judgement and local context to ensure decisions are ethical, inclusive, and effective.
- Outcome-driven performance management – using insight to monitor progress, drive change, and enable services to reach their full potential for residents.

The New Council: Workforce

The workforce approach builds directly on the strategic ambitions proposed in the FOM. The new council's FOM provides an opportunity to reimagine what it means to work for our council and to invest in continuing to develop **a diverse, valued, and multi-skilled workforce that represents, and is best placed to service, Gloucestershire's residents and communities.**

By reshaping how we attract, develop, and empower staff, we unlock **greater mobility, clearer career pathways, and the chance to embed a culture of innovation and continuous improvement** across services.

Gloucestershire's Workforce Challenges

Our workforce is talented and dedicated, but we're not immune to the pressures facing local government. LGR is our chance to tackle these challenges head-on and build a workforce that's resilient, inclusive, and future-ready.

- **Recruitment and retention**: stability is impacted by competition for talent, especially in social care, education, and technical roles. To attract and keep the best, we need to offer more than just a job. Flexible working is increasingly expected, and career pathways could better reflect diverse progression routes.
- **Diversity and representation:** there are gaps in workforce diversity, with underrepresentation in some roles and areas. Promoting Gloucestershire's strengths more widely can help attract a broader range of talent.
- **Wellbeing and change fatigue:** staff are under pressure, particularly in middle management and specialist roles. A stronger focus on wellbeing and open communication can help build a culture that embraces change and supports growth, ready for what comes next.
- **Skills for the future:** rapid technological change means we must invest in digital and data skills across all roles. Updating job structures and expanding access to learning will help build a confident, adaptable workforce ready to lead transformation.

Unlocking New Opportunities for Our Workforce

LGR provides a unique moment to reshape how our councils engage, support, and develop their workforces. By aligning people strategies with the broader transformation agenda, we can unlock new potential and build a future-ready organisation.

Through LGR the council can:

- **Reset organisational culture** by embedding inclusive values, energising teams, and empowering staff to shape services. This fresh start unites

colleagues through adoption of new behaviours, attracts new talent, and creates real ownership and pride, across every corner of Gloucestershire. By putting wellbeing and resilience at the centre, we'll tackle change fatigue and build a workforce that's more connected, motivated, and driven by a shared mission.

- **Strengthen recruitment and retention** by reducing internal competition for talent, enabling more flexible resource sharing, and creating clearer pathways for retraining and upskilling. Structural changes, such as refining spans of control and smarter job design, can improve efficiency and clarity - especially important in high-demand areas like social care, education, planning, and technical services. LGR will allow our council to become a more attractive employer, offering rewarding careers and development opportunities.

- **Build skills and capability** by investing in digital literacy, data competence, and shared training – raising standards and opening-up new career routes. We'll close skills gaps in areas like AI, development operations, data analysis, and data engineering, competing with the private sector and positioning the council as a forward-thinking employer, ready to meet future challenges with confidence. And by sharing these skills with wider partners and the community, we'll boost employment prospects and deliver real social value across Gloucestershire.

- **Support diverse career pathways** by recognising the value of both specialists and generalists and creating structures that reward horizontal and vertical progression equally. Through investing in specialist skills – like commissioning, contract management, market shaping, and quality assurance – we'll help staff feel more valued for their unique strengths and open up fulfilling career journeys across the organisation.

- **Promote workforce diversity and representation** by setting the standard for an inclusive workplace. Addressing persistent gaps in representation and removing cultural and structural barriers in recruitment and progression, we'll build a workforce that better reflects the communities it serves, and where everyone can thrive.

Gloucestershire's Workforce Priorities

Through collaboration across all seven councils, we've identified opportunities to shape a workforce that can deliver on Gloucestershire's bold vision and ambitions:

1. Create a 'fresh start' for the new organisational culture, marking the opportunity to reset organisational identity and behaviours following reform, creating a more inclusive and energising environment.
LGR offers a valuable opportunity to reset organisational culture. It's a chance to reaffirm shared values, refresh our identity, and foster a more dynamic, inclusive workplace. By moving beyond legacy behaviours and empowering staff to shape the new culture, we'll boost morale, strengthen engagement, and inspire pride in our future.
2. Accelerate digital confidence and capability, reflecting the commitment to equip staff with digital skills and tools.
We're embedding digital, data and technology (DDaT) at the core of the new council, backed by real investment in upskilling our people so that they have the tools and support they need to thrive. By expanding graduate schemes and digital apprenticeships, we'll build a workforce that's digitally confident, ready to innovate, and equipped to deliver modern, responsive public services.
3. Design inclusive career pathways, reflecting the commitment to support both specialist and generalist progression by creating flexible, transparent career routes that value diverse skills and aspirations.
We're committed to clear, flexible career pathways that let both specialists and generalists thrive, without being pushed into unsuitable management roles. Current structures often lack the flexibility to support dual career tracks, which can limit the development of specialist expertise. By valuing every route equally, supporting career exploration, and being transparent about role expectations, we unlock talent at every level. And for regulated professions, such as S151 officers, we'll keep the depth and accreditation that excellence requires.
4. Championing diversity of thought and inclusive behaviours, highlighting the importance of embedding equity and inclusion in recruitment, leadership, and everyday practice.
LGR is our platform to embed inclusive practices and celebrate diversity of thought at every level. We're tackling underrepresentation head-on, making sure all staff feel seen, heard, and valued. Our priorities include inclusive recruitment, diverse leadership pipelines, and open dialogue across teams. By championing different

perspectives and lived experiences, we'll strengthen decision-making, build community trust, and create a workforce that truly reflects the population it serves.

5. Building leadership capability – referring to the qualities, skills, and support needed for leaders to guide teams effectively through change and deliver high-quality services

Strong leadership is key to navigating change and delivering high-quality services. LGR creates valuable opportunities to grow leadership at every level. Through shared training, mentoring, and clear development pathways, the council can support leadership growth while defining the qualities needed for the future. By investing in our leaders, we'll boost confidence, enhance engagement, and equip managers to lead with clarity, empathy, and purpose – amplifying the strengths already thriving across our teams.

6. Creating an anchor institution for the wellbeing of our communities

The 2021 Gloucestershire Director of Public Health's annual report "Sources of Strength"[55] described how 'anchor organisations' can support community health and wellbeing and help tackle inequalities in their places. Anchor organisations like the new unitary council will take direct action in areas like employment policies, procurement, buildings, the environment, and place-shaping – leveraging our assets and influence for local benefit. As one of Gloucestershire's largest employers, we'll lead by example.

7. Supporting staff who may not continue in the new unitary council

LGR is also about looking after our people. For those not transitioning into new roles within the new organisation, we'll offer tailored support – including CV writing, interview preparation, and access to redeployment resources – so that everyone feels respected, empowered, and ready for their next step. This compassionate approach values individual contributions and helps maintain a positive organisational culture throughout the change.

[55] www.gloucestershire.gov.uk/media/nb5dugc1/dph-report-2021-sources-of-strength.pdf

The New Council: Digital, Data and Technology

Designing a Digitally-Enabled Organisation for Gloucestershire

Since the announcement of LGR, we've worked with the Local Government Association (LGA) and other councils who've already navigated this process to understand the realistic opportunities and learn from their experiences in digital, data and technology (DDaT) transformation. This collaborative approach has enabled us to identify opportunities, challenges, and best practices, ensuring that our DDaT aspirations are informed by real-world experience and aligned with the government's digital blueprint[56].

Putting residents and communities first is at the core of our DDaT approach. We're designing digital services that work for everyone – whatever their age, ability, or access to technology. While we're investing in DDaT to improve outcomes and experiences, we recognise that not everyone can or wants to access services online. We'll continue to offer alternative ways to get support and information, ensuring that no one is left behind.

Our DDaT vision is to **transform the experience of local public services**, designing an organisation truly fit for the digital age: innovative, efficient, and built to meet the expectations and needs of our local people, communities, and staff.

By uniting all seven councils, we can simplify and standardise services, so every resident enjoys a consistently good experience – no matter where they live or what service they use. This means **easier access, less confusion, and no need to repeat information or navigate multiple systems.** It allows us to focus resources where they are needed most, respond quickly, and deliver joined-up, reliable support. Ultimately, we're building a council that is more efficient, more responsive, and better able to meet the needs of our communities.

What Do We Mean by Digital, Data, and Technology?

Digital: we're creating an empowered and user-centred culture – investing in the right skills and tools to deliver seamless, end-to-end online services that people choose to use because they're simple and effective.

Data: we'll use data strategically and ethically to drive smarter decisions and deliver personalised support. At the heart of our data use will be secure and ethical data sharing, improving interoperability across systems, and using insights to redesign services around real need.

Technology: our approach is robust, secure, and flexible – from cloud and low-code to open-source tools and responsible use of AI. We'll deliver resilient,

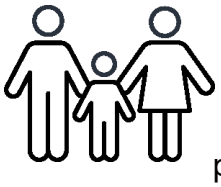
[56] www.gov.uk/government/publications/a-blueprint-for-modern-digital-government

scalable systems that support innovation and work together effortlessly, so every experience feels joined-up and intuitive.

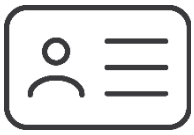
What Difference Will Designing a Digitally Enabled Organisation Make?



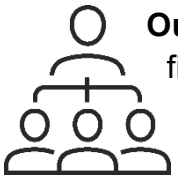
Our residents and businesses across Gloucestershire will access services that are consistent, proactive, accessible, and responsive – joined-up across the council and its partners. By using data smartly (where it makes sense to rather than 'just because'), we'll deliver the right support at the right time, cutting out repetition and confusion. Whether its online, by phone, via email, or face-to-face, everyone gets the same reliable service. And because digital exclusion is real, we're committed to making sure that everyone – regardless of how they choose to engage – can access the support and services they need.



Our communities will have more opportunities than ever to shape services and share their views. Digital platforms will make it easier to access data, share views, respond to consultations, and work in partnership with us – building fairness, trust, and real empowerment. This means communities are enabled to respond to local issues themselves, as well as target support and resources where they are needed most, strengthening local resilience.



Our staff will have the right tools and connected systems, working in a culture that champions learning and collaboration. Routine tasks will be automated, freeing up time for complex work and collaboration within and outside the organisation. We'll trust our staff to experiment, adapt, and grow, supporting them every step of the way to build new skills.



Our leadership will have real-time, high-quality insights at their fingertips, enabling confident, informed decisions. With LGR unlocking joined-up data, we'll see across systems, anticipate future needs, and target resources where they'll have the greatest impact.



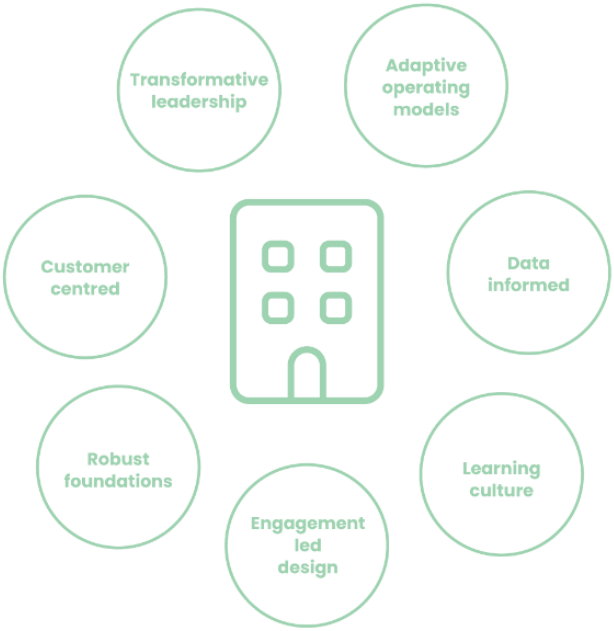
Our new unitary authority will be better equipped to manage demand, streamline processes, and evolve services in innovative ways. By harnessing digital and data capabilities, we'll break away from traditional models of local government service delivery, enabling more targeted support and adaptive operating models. We're committed to becoming an

employer of choice: attracting and retaining talented people by fostering a modern, inclusive, purpose-driven workplace where staff feel empowered to make a real difference.

Our partners will benefit from shared platforms, ethically aligned data, and collaborative delivery, making it easier to work across organisational boundaries. We'll reduce duplication, remove barriers, and create seamless experiences for people using services across different agencies.

Strategic Components of Our Approach

DDaT sits at the heart of Gloucestershire's transformation. We've identified seven key areas that will help us turn our ambition into action – each focused on delivering better outcomes for residents, communities, and businesses.



Transformative leadership

Our leadership will encourage bold innovation – **challenging the status quo** and championing joined-up services across teams, organisations, and sectors. Leaders will foster a culture where experimentation is encouraged, help remove barriers, and use data to make informed decisions. They'll empower staff to 'build, test, learn', embracing continuous improvement over perfection at the first iteration. They'll ask the right questions, equip staff with the tools to answer them, and act confidently on what data reveals.

Adaptive operating model

We'll adopt reusable common components wherever possible, ensuring data portability and a consistent user experience across services.

All services will be online by default (with alternative channels available), underpinned by a single digital process regardless of contact channel. We'll remove unnecessary hand-offs, reduce duplication, and make it simpler and quicker for residents to get what they need. By joining forces with partners across the public and voluntary sectors, we'll deliver a simple and consistent experience across the whole system.

Data-informed decisions

Traditionally, local government has faced challenges with fragmented datasets – both within and between organisations – making early intervention difficult. LGR offers a real opportunity to break down these silos, joining up services and data to enable earlier intervention, faster responses, and more effective prevention. **Evidence-based decision making and investment in analytics, predictive modelling, and AI will better equip us to anticipate demand and drive continuous improvement.**

Robust data governance is non-negotiable. We'll use information safely, securely, and ethically, joining up across services and with partners when there is consent and clear purpose. Clear principles and accountability will guide how we use AI and data, building trust and delivering value responsibly.

Our new unitary authority will enable the implementation of a joined-up predictive analytics platform across adult and children's services, education, housing, and health. By pooling data that used to be locked in districts and county silos, the system will help identify early warning signs of safeguarding risks – such as school absence, housing instability, or repeat A&E visits – and trigger coordinated interventions when needed. In our MASH, for example, we'll enable real-time data sharing across agencies, standardised data formats and dashboards, predictive analysis to identify risk earlier, standardisation of risk thresholds, and automation of routine processes (e.g. triage and referrals).

Customer-centred services

Customer experience and our approach to digital must go hand-in-hand.

Our aim is to deliver intuitive, accessible, and consistently high-quality online services for all residents and customers, putting them at the heart of our service design. One phone number. One website. An integrated digital front door – incorporating tools like live chat and chatbots for 24/7 availability. With smart digital tools and AI, we'll track progress on cases, keep people updated, and

resolve issues faster, freeing up our staff to focus on supporting people with more complex needs.

We'll build public trust through transparency – open dashboards showing our performance, reliability, and commitment to high standards. By connecting information across services, we'll build a fuller picture of our communities' needs and respond with care.

User-centred design and continuous improvement will be our standard. We will test new services and features with real users, gather feedback, and keep improving, so that what we deliver is always intuitive, accessible, and genuinely useful. This will help us to identify and address issues early, refine our services, and make sure our services work for everyone.

Learning culture

We're creating a culture where **curiosity is celebrated, change is embraced, and learning never stops.** We'll blend the best of our existing strengths with our appetite for more experimentation, collaboration, and continuous learning.

We'll learn from the best – partnering with national initiatives like the LGA and the Government Digital Service to improve digital consistency across the sector and drawing inspiration from places that have already led the way, like Greater Manchester and Data Mill North. We'll bring together the council, NHS, universities, technology start-ups, and other partners to pilot bold new ideas and turn innovation into action.

We'll invest in digital skills at every level, including digital apprenticeships, to **build a workforce that can deliver and sustain transformation.**

Listening to our residents and stakeholders

To build online services that are truly inclusive and genuinely responsive to our residents' expectations and needs, we must actively listen to them and recognise the digital exclusion challenges across the county.

Our digital engagement approach will support Gloucestershire's residents and communities to easily provide feedback, join resident panels, and co-design services. Aligned to our proposed locality arrangements, we'll make appropriate data and insights available so that our communities are empowered to shape solutions to local concerns and issues. By teaming up with partners like the VCSFE and parish councils, we'll boost digital skills and deliver meaningful digital engagement.

We'll use data and digital platforms to tailor engagement by location, interest, or demographics. **Robust feedback loops, co-design practices, and transparency will improve inclusive service delivery and build trust with our residents.**

And we're committed to true accessibility. If digital isn't an option, we'll meet people where they are – by phone, in person, or through trusted local partners.

Regardless of the contact channel, the process and experience must feel consistent, joined up, and fair, **ensuring that no one is left behind in our digital transformation.**

Robust infrastructure

The success of the new council will fundamentally rely on robust and dependable technology foundations. We'll ensure our infrastructure, devices, applications, and data are up-to-date, secure, resilient, and dependable.

We'll move to the cloud-based platforms where it makes sense. But we won't just simply replace legacy systems in the cloud – **we'll seize every chance to transform services, using flexible, open-source solutions to promote transparency, efficiency, and innovation.**

Every investment in our infrastructure will be futureproof: cyber-secure, sustainable, and built to last. We'll set clear design principles to prioritise standardisation and interoperability. Environmental sustainability will be a key consideration, ensuring our technology decisions support the council's broader climate and carbon reduction commitments.

We'll equip teams with the right digital tools – like low-code platforms – to design, test, and launch new solutions at speed, scale, and lower cost. We'll tackle 'shadow IT' – where tools, apps, or systems are procured without the approval of the central DDaT service – to ensure every technology decision is strategic, centralised, and fully aligned with our DDaT ambitions.

Our DDaT investments must go beyond devices and platforms to include connectivity. While most of Gloucestershire already enjoys superfast broadband, we'll close the gaps, especially in rural and digitally excluded areas. As a unitary council, we'll be better placed to coordinate infrastructure investment, work with national programmes, and ensure that all communities, regardless of geography, can benefit from modern, reliable, and inclusive digital services.

Summary

Designing a digitally enabled council for Gloucestershire isn't just bold, it's essential. **We're laying the foundations for a modern, responsive, and inclusive organisation.**

The risk of not embedding a clear digital strategy and robust DDaT foundations from day one is real. Without it, we risk building on fragmented systems, outdated processes, and inconsistent data – driving up costs, slowing progress, and limiting our ability to innovate, collaborate, and meet rising expectations.

Our case studies (Appendix 2) already show how **digital is improving outcomes** across the county, streamlining services, and supporting those who need us most. But the real opportunity lies ahead: working together to deliver consistent, high-quality outcomes for everyone who lives, works, or visits Gloucestershire.

As we move through the phases of LGR, our strategy will balance innovation with stability. We'll embed customer focus from the outset and set a clear roadmap for future transformation.

Ultimately, our DDaT ambitions will enable us to become a proactive council that delivers meaningful outcomes. Our new council will feel modern, human, and trustworthy – **designed around the people we serve and powered by the best of digital, technology, and data insight.**

The New Council: Democratic Arrangements

We're creating a single, unified council with a bold vision for Gloucestershire. One that speaks with one voice, champions the whole county, and delivers for every resident.

Local members will be strong representatives and true community leaders, deeply connected to local priorities and aspirations, clearly accountable for services, and powerful convenors who bring people and partners together to deliver real impact.

Bringing together the county council and district councils into one unitary authority will simplify local government, making it easier for residents to engage with the council, with local members at the heart of that relationship.

Right now, electoral arrangements across seven councils mean that every year sees a council election in at least one part of the county. **A single council means coherent leadership, long-term planning, and a stronger, more consistent voice for Gloucestershire.**

Council	Number of Councillors	Electoral cycle	Next election
Gloucestershire County Council	55	All out every 4 years	May 2029
Cheltenham Borough Council	40	Elected in halves every 2 years	May 2026 May 2028
Cotswold District Council	34	All out every 4 years	May 2027
Forest of Dean District Council	38	All out every 4 years	May 2027
Gloucester City Council	39	All out every 4 years	May 2028
Stroud District Council	51	All out every 4 years	May 2028
Tewkesbury Borough Council	38	All out every 4 years	May 2027
Total	295		

Table 9: Current electoral arrangements

A single unitary council will simplify local democracy, reduce councillor numbers, and create a more stable political landscape for Gloucestershire. But this isn't about centralisation - it's about strengthening local voices.

We're committed to **enhancing democracy**, not diluting it. Local members will be empowered to lead, listen, and act, backed by a council culture that puts communities first.

The new council will start with **110 members**, with each current county division electing two councillors. This builds on a recent boundary review, ensuring **fair representation** without delay or disruption. Existing district ward boundaries aren't

fit for purpose; unequal elector ratios and inconsistent structures (single-, double-, and triple-member wards) make them unworkable for a modern, unified council.

A streamlined council of 110 members - one for every 4,477 electors - matches the average for similar unitary authorities, avoids the need for an immediate boundary review, and ensures:

- **Capacity to lead through transition,** while staying closely connected to communities.
- **Representation across large, rural divisions** with multiple parishes.
- **Clear democratic accountability from day one**, with councillors who are visible, accessible, and responsive representatives of their communities.

In time, a boundary review will be requested, which may in turn reduce the council to around 90 members (approximately 5,472 electors per member), moving to smaller, single-member divisions for clearer public accountability.

A new unitary council would result in an **initial reduction of 185 councillors**, followed by a **further reduction of 20 councillors within a few years,** striking a balance between a simpler, more effective system and strong local representation.

Our governance will be built on four core principles:

- A clear, unified voice for Gloucestershire
- Seamless collaboration across the public sector
- Strong transparency and accountability
- Community needs at the heart of every decision.

We're designing a modern, responsive council - one that leads with clarity, collaborates with purpose, and puts communities at the heart of everything it does.

We'll deliver this through:

- **Strong, visible leadership** from a proactive Leader and Cabinet, fully engaged in shaping Gloucestershire's role in the future Combined Authority.
- **Engaged, flexible scrutiny** that brings together all political groups - and where needed, external voices - to shape policy and hold decisions to account. We will use creative, constructive approaches to scrutiny, working at both a strategic and a local level to make sure we're meeting the needs of our communities.
- **Proud civic leadership**, preserving the heritage and ceremonial roles of Gloucester and Cheltenham, while strengthening county-wide identity through the Chair of the council and ties with the Lord Lieutenancy.
- **Local decision-making** power through area planning committees with real powers over planning and other place-based matters.
- **Neighbourhood Partnerships** that reflect real communities and local priorities, shaping services, guiding funding, and driving community-led development.
- **A stronger role for Town and Parish Councils**, backed by a jointly owned charter and new opportunities to take on devolved powers, tailored to each council's appetite and capacity.

- **Real opportunities for children and young people** to share their views and help shape the decisions that affect them.
- **A culture of participation**, with co-production and engagement embedded in how we work, reaching every community, including those in non-parished areas.

The New Council: Empowering Gloucestershire – Our New Locality Arrangements

Unitarisation provides us with a unique opportunity to **rewire the connections between places, people, and organisations**. Since the English Devolution White Paper was issued, Gloucestershire's seven councils have worked together to **reimagine our system, with local places at its heart.** The result is a proposal to unlock the strengths in our community organisations, in our diverse places, and above all, in the people of Gloucestershire.

Our council leaders are united in a desire to shift the extent and quality of community empowerment. We want to take the best of our smaller scale and localised good practices, delivered by councils and key partners, and scale them up - making it central to how we work as a new council.

Grounding our approach in evidence

We've worked closely with local associations and organisations to understand what truly empowers communities and to map the strengths of our current system. We've drawn on insights from over 20 unitary councils with area-based arrangements and conducted a review of national best practice. Our early conclusions were clear: given the scale and diversity of a unitary Gloucestershire, **a neighbourhood approach is essential** for our future accountability, effectiveness, and cohesion.

Among many learning points, the following stand out:

- **Trust and consistency matter:** Too often, new unitary councils have struggled to deliver the locality promises set out in their proposals, risking trust, especially with parishes and the VCFSE sector. Our approach puts **long-term relationships and trust at the heart of everything we do.**

- **A whole council priority:** Neighbourhood arrangements are not an 'add-on'. To deliver prevention, participation, and wellbeing, good practice cannot be confined to a neighbourhood model. **Leadership, culture, and structure must be joined up and focused on empowering communities.**

- **Community development drives real change:** Unitary councils have made strides on using area-based arrangements to act on visible economic and environmental issues, but many have found tackling health, inequalities, and social challenges at the neighbourhood level has been tougher. By **applying resources and focus to community development**, working together with the VCFSE and NHS, we will unlock better outcomes. In our model, the role of public health is central - bridging the priorities and capacities of health and local government systems.

- **Area-based approaches build stronger communities:** The evidence is clear: when councils work across sectors and issues, communities thrive. But a top-down, overly formal approach stifles innovation and inclusivity.

We're committed to test-and-learn, and genuine engagement in ways that make sense to people - making sure every resident feels included.

These learning points have been crucial in shaping our model and proposals**.**

Our current locality models

Neighbourhood approaches are already woven into the fabric of local services, delivered by councils and partners at various geographic scales. As current district boundaries become less relevant, our focus shifts from serving broad populations of 100,000+, to local communities of 20,000 - 50,000. **It's about putting people at the centre - organising around natural communities and driving real change where it matters most.**

The Gloucestershire Place Pyramid

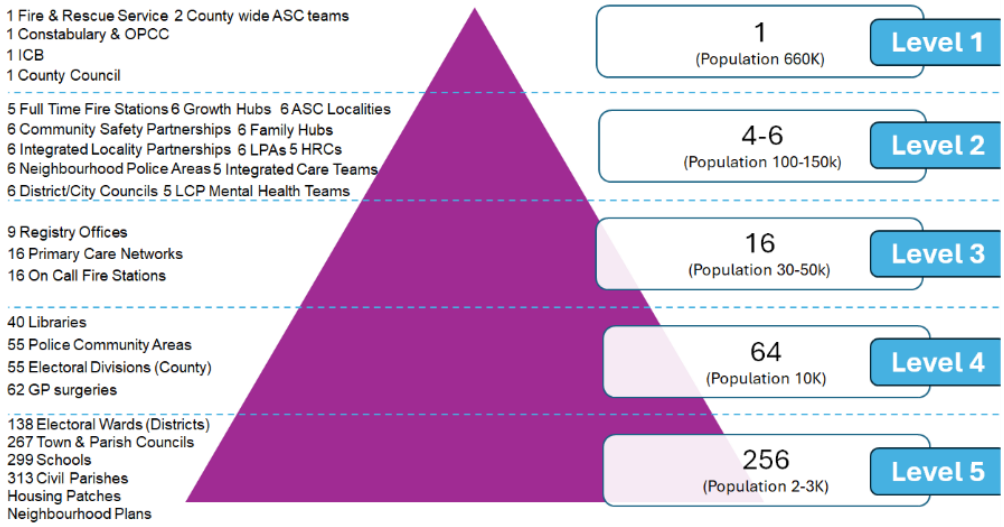


Diagram 1: Gloucestershire's current locality approaches

Across our seven councils and partners, we see a rich diversity of approaches – each driving positive change in its own way:

- **Stroud's community hub approach:** born during the pandemic, but now evolved into a dynamic partnership - bringing together local voluntary organisations, parishes, and housing providers to tackle social isolation and health and wellbeing
- **Integrated Locality Partnerships (ILPs):** led by the NHS, uniting health and other partners at a local level, currently based on district footprints
- The wealth of **community-centred regeneration and economic initiatives**, including the award-winning Gloucester Forum and the Golden Valley development in Cheltenham – proof that **local ambition delivers real results**
- **The Forest of Dean's innovative partnership** between the district council and Forest Voluntary Action Forum has developed a dynamic approach to youth services and more
- The recent successful launch of **Gloucestershire's** Family Hubs and associated Family Hub Networks. Organised in five locations across the county, with an emphasis on wider outreach. Partners include the

Gloucestershire Gateway Trust which has developed a neighbourhood and community led approach to supporting children and families

- The area-based **community development approach pioneered in Tewkesbury** and closely tied to the rapid housing and business growth in the area
- Cotswold District Council's active approach in its unique geography supports 115 parish and town councils, with the annual **'Cotswold Parish and Town Summit'** as a showcase for local leadership and collaboration.

We know that great practice already exists in Gloucestershire – but much of it needs to be scaled up and shared across boundaries.

Neighbourhood Partnerships: A new way of engaging and delivering

We're proposing a new system of Neighbourhood Partnerships[57]. Each partnership will have the freedom to set its own agenda and priorities, **rooted in what matters to local people.** Their scope is broad by design – giving every place the space to shape its own future. The five key roles each partnership will perform are set out below:

Core roles for Neighbourhood Partnerships	
Engagement and empowerment	Each neighbourhood will build on existing great work to get local residents and organisations involved. **Neighbourhoods will be the go-to forum for the council and other agencies to listen, consult, and make sure actions are relevant and responsive to local needs.**
Community development	Neighbourhoods will be backed by real resources to drive community development. Working with public health, and other expert capacities, community development will play a key role in **tackling inequalities and amplifying the voices of those too often unheard**. Neighbourhoods will work closely with the VCFSE sector to shape and provide this function.
Service access and delivery	Each neighbourhood will map local services, data, assets, and capacity. **All council services will work together with neighbourhoods**, with many having a visible, accountable presence at the local level. How different services are involved will naturally vary.
Funding and decision-making	Neighbourhood Partnerships will have a main committee made up of local councillors and non-voting members from local organisations. Neighbourhoods will get **funding and staff resources to deliver** on its priorities. Committees will set their own work programmes, decide how resources are used, and make decisions on local priorities. They'll be accountable to

[57] 'Neighbourhood Partnerships' would fulfil the role of 'Neighbourhood Area Committees' set out in the current Devolution Bill

Core roles for Neighbourhood Partnerships	
	local people, shape council work on the ground, and play a key role in the planning system.
Prevention and Wellbeing	**Neighbourhood structures aren't a *'nice to have'* – they're essential**. Connected communities achieve better outcomes, from early years and health to democracy and community safety. We'll put data and evidence at the centre of neighbourhood working, powered by our public health and performance capabilities. Neighbourhoods, whilst setting their own priorities, will have **a duty to focus on prevention in everything they do.**

Table 10: The core roles for Neighbourhood Partnerships

We've built these core roles by listening to the views and experience of councillors from all seven councils. At a recent all member webinar, councillors ranked the key roles for Neighbourhood Partnerships in order of importance – and the results are clear. Service accountability, residents voice, health and wellbeing, community development, and joined up working between the council, parishes, and partners all came out on top. This will continue to be tested with local people and organisations.



Diagram 2: Results from all member webinar ranking exercise

The size and shape of our Neighbourhoods

Neighbourhood size and boundaries won't be drawn in isolation – they'll be shaped by thorough consultation. Our research suggests each neighbourhood needs to be big enough for the council and partners to focus resources, but small enough to reflect a natural community. Most will be made up of a main town and its surrounding villages, or a recognisable neighbourhood within a major town or city. We're suggesting populations of 20,000 - 50,000, with options set out within the consultation process. The result will be between 15 and 25 Neighbourhood Partnerships for Gloucestershire.

We're proposing the current county electoral divisions as the main 'building blocks' of neighbourhoods. But boundaries aren't set in stone - this will form part of the consultation and some adjustments will be needed to better reflect natural communities. Neighbourhood committees will be composed of between four and ten local councillors (depending on size), in addition to co-optees.

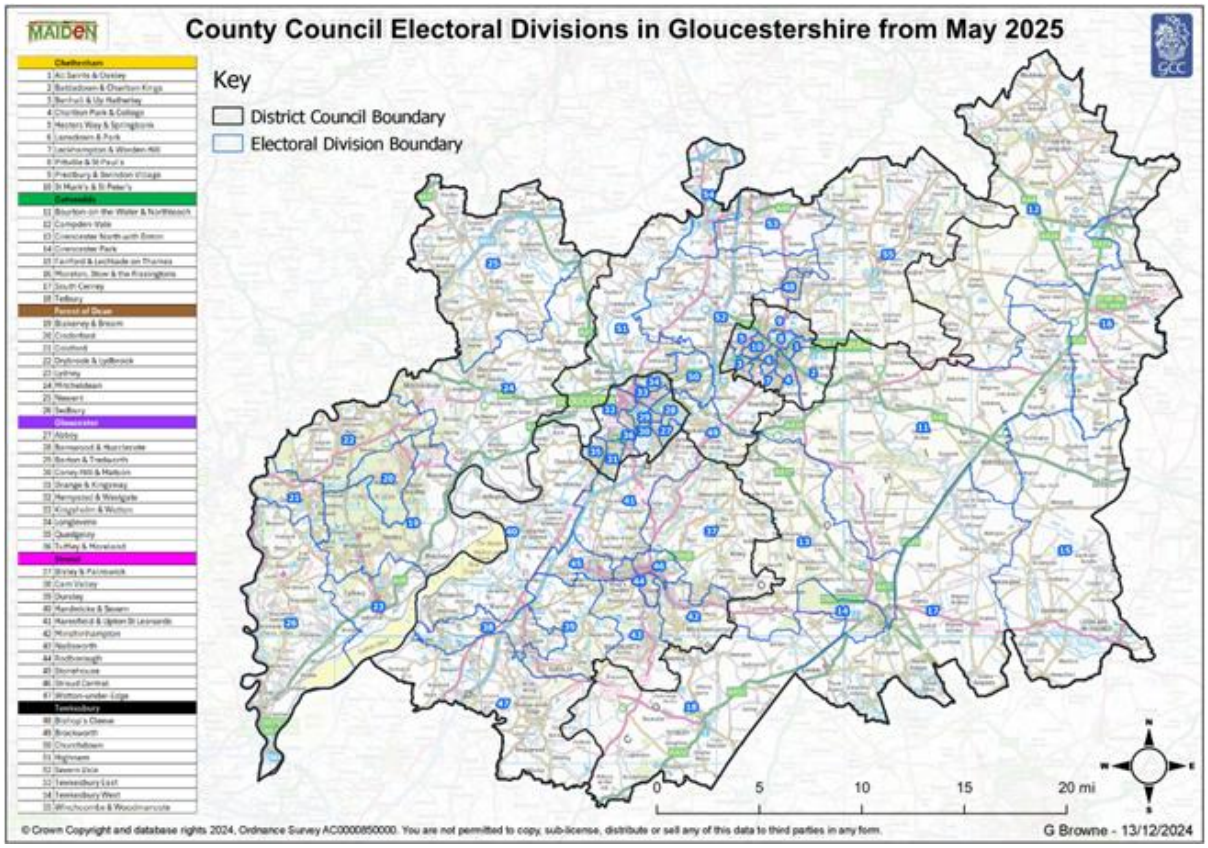


Diagram 3: the current county electoral divisions

Our adaptive and flexible approach

Not everything the council does will fit neatly into our structure of Neighbourhood Partnerships. We would expect the shadow authority to consider area-based Development Control committees on a larger scale than Neighbourhood Partnerships. But **Neighbourhood Partnerships will still play a vital planning role** - acting as consultees in a future *Statement of Community Involvement* and, where it makes sense and is wanted locally, in the development of *Neighbourhood Plans*.

Investing in Neighbourhoods

An expert team will be built around our Neighbourhood Partnerships:

- **Chair of the Neighbourhood Partnership**: An elected councillor, nominated by councillors in the neighbourhood
- **Neighbourhood Partnership manager**: Together with the chair, this role will form a crucial leadership partnership in making the neighbourhood work successfully
- **A council neighbourhoods team**: Officers assigned to each neighbourhood. A mix of practically focused managers, town and parish liaison officers, and community development specialists
- **Departmental council officers:** Located in family hubs, housing patches, planning, public health, or social care, these officers will have a strong relationship with neighbourhoods
- **VCFSE:** The VCFSE sector will play a crucial role in the grass roots work for each neighbourhood, some potentially working with the council in managing and facilitating a whole neighbourhood, or providing expertise in community development
- **Partner organisations:** Health, fire and rescue, police, schools, and registered housing providers will also play a vital part. Over time, we expect to see stronger alignment of partner boundaries with that of our Neighbourhood Partnerships
- **Performance team**: Data and evidence specialists will be assigned to neighbourhoods to help identify insights and needs, and track progress
- **Public Health:** Professional oversight and support, ensuring Neighbourhoods use data, policy, and evidence to maximum effect.
- **Director-level officer champions:** Each neighbourhood will be assigned a director-level officer champion to support leadership and delivery
- **Services**: Every external-facing council service will develop a neighbourhood offer, ensuring the approach runs through everything we do
- **Budgets:** We anticipate providing a budget for each neighbourhood to fund projects and activities. We also want neighbourhoods to have real influence on other funding streams, both from council departments such as highways and transport, and as part of central government bids.

Every neighbourhood will have its own context, needs, and ambitions. Whilst all will get a baseline support offer, the new council, with partners, will focus on addressing inequalities, some of which will be more prominent for particular neighbourhoods.

Enabling the VCFSE to achieve more

To strengthen our commitment to residents and Gloucestershire's 4,600 VCFSE organisations, **we'll create a Civil Society Covenant with the Gloucestershire VCSE Alliance**. This Covenant, backed by a clear action plan, will set out how local government and the VCFSE will work together for stronger communities. A governance body of councillors and VCFSE representatives could be formed during the Shadow period.

Making the role of local councillor more effective and accountable

Unitarisation means fewer councillors covering more service areas, bigger geographies, and more electors. **Neighbourhoods provide the crucial local member role with greater structure, capacity, and convening authority.** Neighbourhoods bring partners around the table, helping councillors address issues collectively and with expert support. This joined-up approach reduces duplication and supports meaningful two-way engagement between elected members, residents, and organisations.

Working with local councils (parishes and towns)

Gloucestershire's 267 parish and town councils are a vital part of our communities – and LGR will have a real impact on them. **Parish and town councils are an essential, vibrant part of our communities**, and we see their development as a vital ingredient in our unitary future. The lesson from elsewhere is that where trust and respect between principal councils and local councils break down, opportunities are missed and outcomes suffer.

We'll work with the Gloucestershire Association of Parish and Town Councils (GAPTC) and the Gloucestershire Society of Local Council Clerks (SLCC) to **develop a new charter**. A draft will go to the shadow authority for adoption, setting out clear rights, responsibilities, and governance arrangements to maximise collaboration and two-way communications. **This charter will be the foundation for strong, effective partnership between principal authorities and local councils.**

Neighbourhood Partnership will be a linchpin for locality working - and town and parish councils have a valuable role to play in these structures.

As the county's major urban areas, we expect **special consideration by the new council will be given to parishing Gloucester and Cheltenham**. Each has major historical and future importance for Gloucestershire, and parishing will help protect their identity and drive momentum. Subject to consultation, we expect community engagement and neighbourhood empowerment to be strengthened by the good governance through parishes that cover most of each urban area. In Gloucester, this could mean a single large parish (city) arrangement, potentially excluding the existing parish of Quedgeley. In Cheltenham, options include a single town council or a federated parish model, combining existing parished and unparished areas. These new arrangements would hold some of the key cultural, civic, and public realm responsibilities, and play a major part in boosting the visitor economy.

Beyond Gloucester and Cheltenham, many parishes are eager to develop their offer. We'll work positively with these parishes to maximise value for local people and places, keeping value for money in mind**. There will be equal opportunities for larger areas (like Cheltenham and Gloucester) and smaller towns or parishes to take on services and assets.** The new council will keep a close eye on overall council tax levels, including parish precepts. Any new parishing, or extension of parish responsibilities, will be a matter for the new principal council to consider and subject to Community Governance Reviews.

We support recent Ministerial statements that have made clear the differences between parish and neighbourhood roles. Strong parish arrangements are vital, but they don't replace the need for a neighbourhood offer anywhere in Gloucestershire. We have valuable local capacity in our towns and parishes, and so we see their involvement in neighbourhoods as important. We celebrate the diversity in the parish offers across Gloucestershire as a reflection of what local people want and need in their communities.

Implementation

Seven activities will shape our work over the pre-shadow period, and are built into our implementation roadmap:

1. **Formal consultation on Neighbourhood Partnerships:**

We'll deliver a **formal consultation on Neighbourhood Partnerships** in the shadow authority period, enabling implementation in Year 1 of the new unitary council. We'll test our thinking through early engagement in the pre-shadow period. Our engagement and consultation will include:

- Neighbourhood Partnership geographies and boundaries
- Core roles and responsibilities
- Local priorities, services, and needs
- Alignment with partner organisations on approaches and geographies
- How Neighbourhood Partnerships may evolve over time
- The support, capacity, and resources needed to make them work (bearing in mind financial constraints).

2. **Civil Society Covenant:**

During the pre-shadow period, we'll co-design a Civil Society Covenant with the VCSE Alliance and partners, with a draft covenant ready for the shadow authority to consider and consult on in readiness for Year 1 of the new council.

3. **Local Councils Charter**

Working with GAPTC and SLCC, we'll develop a draft charter and action plan for the shadow authority to consult on. It is anticipated the charter will be governed by a body of councillors and local council representatives. The seven principal councils will also work together in the pre-shadow period to ensure clear, consistent communications and policies are in place for working with local councils.

4. **Parishing Cheltenham and Gloucester:**

In partnership with Cheltenham Borough Council, Gloucester City Council, and the parish associations, we'll develop a model for how parishing can support the continued **identity, good governance, and regeneration / growth in our major urban areas**. Decisions on the precise form of proposals and consultation process will rest with the new council.

5. **Service planning:**

We'll consult with all county and district services in the pre-shadow period to shape how they'll work with neighbourhoods - feeding into service planning for the new council and establishing a clear **'services and assets offer'** for each area.

6. **Policy development:**

A range of **policy development work** will ensure:

- Neighbourhood approaches are supported by good evidence
- Frameworks and models are established for different types of activity (such as community development, project funding, and neighbourhood action plans)
- Robust neighbourhood governance
- Neighbourhood level data and data insight tools are developed

7. **Partner integration:**

We'll work together with all our statutory partners to integrate our proposals with their frameworks and priorities. **Our neighbourhood structure will provide a powerful channel for partners to engage with communities**. We share the excitement and interest in how the NHS 10 Year Plan will translate into action in Gloucestershire, particularly regarding proposals for a 'Neighbourhood Health Service' and its emphasis on prevention. We will continue to work closely with our health partners and others to ensure the local geographies and approaches we use are aligned in the best interests of Gloucestershire's residents.

The Financial Case for a Single Unitary for Gloucestershire

The financial cases for both the 1UA and the 2UA options have been developed together, using the same financial model, assumptions, calculations, and governance.

Leaders, Chief Executives, and Section 151 officers from across all Gloucestershire councils have worked together to develop, scrutinise, and sign off all key inputs, assumptions, and outputs. This joint approach means both financial cases are robust, transparent, and carry a high level of local assurance.

The financial case for the **1UA proposal** is set out in four stages:

1. **Financial case summary**
2. **Day one financial position[58]:** This is the starting baseline in terms of potential income and expenditure that the new council would inherit
3. **Reorganisation costs and benefits:** The financial impact of the structural changes that are likely as a result of LGR, including:
    a. One-off transition costs e.g. for data and systems migration or implementation management
    b. Recurring reorganisation savings e.g. in relation to service consolidation
4. **Transformation benefits:** Savings as a result of fundamental changes to ways of working e.g. digitisation, automation, changes to ways of working, investment in prevention, or procurement.

Our financial case assumes that Gloucestershire County Council is designated within the LGR Structural Changes Order as a continuing authority. This approach will allow unnecessary costs and effort to be avoided, but is intended to have no impact on the change opportunity all current councils agree will be a major factor in delivering the 1UA proposal in the best interests of the people of Gloucestershire.

Overall financial case summary

The table below sets out the key headlines for the 1UA proposal.

Potential day one financial position (c. 1st April 2028)	
Total income	£851.4m
Total expenditure	£851.4m
Net position	£0.0m

[58] The analysis takes account of the likely impact of the outcome of the Government's *Fair Funding Review 2.0 consultation*. Local assumptions, supported by the latest *Pixel* model available (*Pixel LGR Disaggregation Model August 2025 v1.2*), have been made in relation to Fair Funding. The projected financial positions will therefore need to be updated once national funding allocations are confirmed in the forthcoming Local Government Finance Settlement.

Reorganisation Costs and Benefits	
Gross annual reorganisation savings	£21.1m
Ongoing annual disaggregation costs	£0.0m
Net annual savings	£21.1m
One-off transition costs	-£21.3m
Payback period	2.0 years
Cumulative net saving after 5 years	£58.7m
Cumulative net saving after 10 years	£164.0m
Transformation benefits	
Recurring annual transformation savings fully delivered by year 5 – **Base**	£16.0m
Recurring annual transformation savings fully delivered by year 5 – **Stretch**	£26.2m

Table 11: Headlines from 1UA financial case

Note: Values preceded by a '–' symbol indicate a deficit.

Potential day one financial position (the starting baseline)

One day one, the 1UA authority would inherit a balanced budget, with both income and expenditure set at £851.4m. This position has been prepared on the basis that the seven councils will take any action required to achieve a balanced budget over the period leading to the anticipated Vesting Day of 1 April 2028.

Potential day one financial position (c. 1st April 2028)	
Total income	£851.4m
Total expenditure	£851.4m
Net position	**£0.0m**

Table 12: 1UA day one financial position

Total income: This figure aggregates council tax, retained business rates, and government grants, providing a simplified revenue base for service delivery. The Fair Funding Review is expected to reduce the overall level of resources for Gloucestershire and therefore, total income projections from 2025 MTFS have been adjusted downwards at the time of writing. However, these numbers are likely to change further following the 2026/27 Local Government Finance Settlement in December 2025.

Total expenditure: This figure consolidates the full range of service responsibilities currently delivered across both county and district councils, including the county council's projection of £486m spend by 2028/29 on both adult and children's services.

Note: The source data for income and expenditure is based on each council's individual MTFS and each council has applied their own local assumptions on how to achieve balanced budgets over the four-year period to 2028/2029 e.g. in relation to how reserves are deployed.

In addition to the total income and expenditure position, it is also important to consider what the new council will likely inherit on its balance sheet in terms of assets and long-term liabilities:

- **Assets:** 1UA would inherit long term assets with a total value of £4.4 billion on Vesting Day. This figure reflects the combined current long-term assets with planned capital expenditure to 2028/29. The portfolio comprises assets such as property, investments, and heritage assets, in addition to Housing Revenue Account assets.
- **Long-term Liabilities:** 1UA would also take on long-term liabilities of £1.1 billion, which includes outstanding borrowing and a Dedicated Schools Grant (DSG) deficit of £234.3 million.

The DSG deficit is a material factor in the financial outlook for Gloucestershire. The most recent MTFS projects that the DSG deficit will rise from £76 million at the end of March 2025 to more than £100 million by March 2026. By 2028/29, the cumulative deficit is forecast to exceed £200 million.

At present, the statutory override allows councils to hold DSG deficits "off balance sheet". However, this override is due to end in March 2028. If no new national policy is introduced, councils across the country would be required to absorb these deficits within their core budgets, creating a significant risk to financial stability.

For Gloucestershire, this means the DSG position must be kept under close review, with the statutory override and national reforms determining the future treatment of the deficit and ongoing cost of service provision.

Reorganisation costs and benefits

Moving to a unitary model creates a clear set of costs and benefits. These arise directly from consolidating seven councils into a single authority. The financial analysis brings these costs and benefits together to show the savings that can be achieved, the costs of implementation, and the overall net impact.

Estimated savings, disaggregation costs and transition costs of LGR in Gloucestershire

	Annual gross saving	Additional Annual Costs	Net annual saving	One off transition costs	Payback Period	Cumulative net saving after 5 years	Cumulative net saving after 10 years
1UA	£21.1m	£0.0m	£21.1m	-£21.3m	2.0 years	£58.7m	£164.0m

Table 13: Summary of 1UA estimated reorganisation costs and benefits

The 1UA proposal is projected to deliver annual gross savings of £21.1 million with one-off transition costs of £21.3 million. This results in a payback period of just two years (noting that the annual reorganisation savings are phased and not all fully delivered in year 1).

Savings drivers

Key drivers for savings are as follows:

- **Democratic streamlining –** Through reducing the number of councillors (from 295 to 110) and frequency of elections, savings of c.£0.9m per annum can be achieved e.g. from reduced member allowances and election costs.

- **Workforce rationalisation -** Consolidating senior leadership teams and streamlining back office functions such as finance, HR, ICT, and customer contact result in workforce savings (as these are likely to be positions and teams which are duplicated across all seven councils).

- **Third party procurement and contract consolidation –** Opportunities to aggregate procurement, renegotiate contract terms, and standardise specifications will reduce cost and complexity. In financial terms, a single authority could be expected to deliver annual third party savings equivalent to approximately 1.5% of its addressable third party spend.

- **Property rationalisation -** Currently both county and district councils operate buildings that serve overlapping functions in the same localities. A single UA allows for rationalisation of this estate, with duplicated sites removed and more efficient use made of shared service centres. In financial terms, a single authority could be expected to deliver annual property savings equivalent to approximately 12%.

One off transition costs

Establishing a new authority requires significant upfront investment covering the full programme of standing up new governance and operational structures; ICT integration and migration; development of a new legal and constitutional framework; public consultation; branding; communications; and programme management. For a single UA, this is estimated to cost c.£21.3m.

These costs are based on assuming that the Reorganisation Order would name Gloucestershire County Council as a Continuing Authority.

Type of transition cost	**Estimated cost (£)**
Redundancy	4,033,000
External comms, branding and implementation	366,000
External transition, design and implementation support	4,700,000
Internal programme management	2,200,000
Creating the new council	700,000
Contingency	5,500,000
Organisation closedown	400,000
Public consultation	274,500
ICT costs	2,800,000
Shadow costs	311,100
Total	**21,285,000**

Table 14: Estimated transition costs for 1UA

Transformation benefits

Reorganisation can deliver structural savings, but the greater opportunity lies in the subsequent transformation that can take place. This means using the scale of a new authority or authorities to modernise services, redesign ways of working, and create efficiencies beyond what structural change alone can achieve.

Financial analysis has identified five main categories where transformation savings are realistic and quantifiable. For each category, we have tested two scenarios for transformation:

- **Base case:** Assumes cautious delivery of savings in line with past performance across Gloucestershire's councils. The base case is

deliberately conservative and ensures that assumptions remain credible and deliverable without requiring major change programmes.

- **Stretch case:** assumes sustained investment in digital and organisational redesign, drawing on best practice from other unitaries. Including a stretch case is important as it demonstrates the potential prize available if early reorganisation savings are reinvested into transformation.

Category	Base %	Stretch %	Rationale
Front office staff	6%	12%	Workforce rationalisation through the structural impact of LGR accounts for savings that can be made through removing duplication. However, potential opportunities through utilising the potential of AI, automation, and channel shift will reduce the demand on customer contact centres.
Service delivery staff	3%	6%	Transformation can strengthen demand management, early intervention, and integrated pathways particularly in services like adults and children's services. Service redesign and new operating models will also unlock additional opportunities e.g. through digital, process redesign etc.
Back office staff	7%	9%	Consolidating support functions such as HR, finance, payroll, and ICT enables investment in shared systems and automation. This creates opportunities for streamlined processes and reduces overheads.
Third party spend	2.5%	3.75%	Unified procurement and contract management can deliver efficiencies by aggregating contracts, renegotiating supplier terms, and redesigning commissioning arrangements. However, savings targets are cautious overall recognising Gloucestershire councils already include procurement savings in their MTFSs, leaving limited headroom.
Income (sales, fees and charges / commercial)	1.3%	2.1%	Transformation also includes growth in fees and charges, commercial activity, and investment in economic development. This builds on the county's strengths in advanced manufacturing, cyber, and green technology, and on planned growth initiatives such as the Golden Valley and Severn Edge projects. Overall targets are conservative given volatility and underperformance in past income forecasts.

Table 15: Estimated transformation savings for 1UA

Transformation savings are not expected to be immediate. They are profiled to phase in gradually as programmes are implemented. The model assumes full delivery by **Year 5,** with the savings per annum expected by this point set out in the table below.

Transformation savings	**Base case**	**Stretch case**
Savings per annum by Year 5	£16.0m	£26.2m

Table 16: Total transformation savings in £ terms for a 1UA

Options for funding LGR and enabling transformation

Delivering the 1UA option requires significant upfront investment with estimated transition costs of reorganisation of £21.3m.

There are several options for funding these costs:

- **Reserves -** Councils hold reserves that are not earmarked that can be applied to one-off expenditure. These provide an immediate source of funding without adding to ongoing revenue pressures.
- **Capitalisation Direction -** Subject to government approval, some costs could be treated as capital rather than revenue. This option, known as capitalisation, has been used in previous reorganisations to reduce pressure on the revenue budget. It applies to costs such as redundancy and ICT integration.
- **Government Support -** Additional funding may also be provided by central government. This could be in the form of transitional grant support, flexibility in financial rules, or early devolution funding. Engagement with the government will be required as proposals are developed.
- **Reinvestment Principle -** Early reorganisation savings can be ring-fenced and reinvested in transformation. This ensures that efficiencies are not absorbed by service pressures but are used to fund programmes in digital, automation, and service redesign. By doing this, initial savings are recycled to create larger recurring benefits in later years.
- **Benefits Compounding -** Investment in transformation compounds over time. For example, reinvesting a portion of early savings into digital customer platforms reduces front office demand, delivering recurring efficiencies by year five. Similar reinvestment in automation and AI can reduce back office and service delivery costs.

Council Tax Alignment (CTA)

Council tax is a major source of income for any new authority. When seven councils with different council tax rates are merged into a new authority, these rates must be aligned. The way this is done affects both residents and the financial

resilience of the new council. It is also a fiscal lever that can be used to balance out net operating deficits or provide funding to invest in service improvements or resident priorities.

Approach to Council Tax Alignment

To inform decision making, detailed modelling has been undertaken to show how different alignment options would affect what residents are required to pay in the future. The modelling uses the 2024 council tax base as the starting point, net of local council tax support, and applies the councils' own projections to forecast growth in the tax base inclusive of the collection rate. Future Band D rates are assumed to increase annually by 4.99% for county and unitary councils and 2.99% for district councils up to Vesting Day in April 2028, consistent with current MHCLG guidance. From Vesting Day onwards, a new unitary authority rate is assumed to increase at 4.99% per year.

The methodology compares projected receipts under alignment with a baseline of what each council would have collected if they continued independently. The difference between these two scenarios represents the additional income gained or foregone through alignment.

Alignment Options

The analysis models a main scenario using the weighted average where rates align to an average Band D calculated across the county, weighted by the tax base. This is the option chosen in most recent local government reorganisations.

Each option can be implemented in one year or phased over several years, with the statutory maximum alignment period set at seven years. The period over which council tax is aligned is an important decision. A longer alignment period of up to seven years minimises the immediate impacts on residents by phasing changes gradually. However, aligning earlier allows the new authority to secure additional income more quickly, providing funding for services. Earlier alignment also avoids the perception of unfairness, where residents in some areas continue to pay higher rates for longer while receiving the same services.

Summary of potential impact

Council Tax Alignment alters Band D charges across districts because current rates differ. The scale of change depends on which alignment option is chosen and whether this is implemented in one year or phased over several years.

Under the **weighted average** option for a 1UA in one year, Band D households in Cheltenham, Gloucester, the Forest of Dean, and Stroud would see reductions in their bills, ranging from £5 to £41 per year. In contrast, Band D households in Cotswold and Tewkesbury would see increases of £57 and £62 respectively.

Current District	Aligned Band D rate (£)	Change in Band D rate (£)	% change in Band D Rate
Cheltenham	2,170.38	-37.01	-1.68%
Cotswold	2,170.38	57.20	2.71%
Tewkesbury	2,170.38	62.17	2.95%
Gloucester	2,170.38	-32.05	-1.46%
Forest of Dean	2,170.38	-5.01	-0.23%
Stroud	2,170.38	-41.40	-1.87%

Table 17: Weighted average council tax alignment in one year in a 1UA

Note: A '–' sign in front of the number and green text indicates a reduction for residents in their bills.

Engagement to Discover and Improve

Our engagement approach has been shaped by the guidance within the invitation to submit proposals: it's been rooted in genuine discovery and learning, not campaigning for any particular outcome. This focus on open engagement has been enabled by:

- **Unified, option-neutral engagement:** We agreed that both the single unitary and East / West two unitary options would be developed side-by-side, without using the collective engagement activity to campaign or advocate for preferences
- **Strong political leadership:** Gloucestershire's Leaders set the tone – driving a shared engagement plan across councils
- **Clear accountability:** A lead Chief Executive was appointed to oversee all communications and engagement activity
- **Joint working:** Every council played an active role through a joint communications and engagement workstream
- **Prioritised investment:** We prioritised MHCLG LGR funding to support joint engagement activities.

These early actions, underpinned by a clear sense of purpose, enabled us to deliver a wide range of non-partisan engagement activities – each designed to listen, learn, and feed real insights back into the development of our proposals.

Our key engagement activity

Our joint engagement activity from March 2025 – September 2025 is summarised in the table below:

Engagement type	Key activities
Public	• Option-neutral Future Gloucestershire microsite[59] presenting clear, factual information • Online survey, designed to discover values, concerns and ambitions of local people (3,112 completed surveys, including 1,480 open-text responses) • In-person community events, enabling over 500 one-to-one conversations (12 events in total, two in each district) • Two county-wide public webinars • Information leaflets and display banners (used principally at council offices and community events) • Regular social media information updates and paid advertising for wider promotion of the survey.

[59] https://futuregloucestershire.org.uk

Engagement type	Key activities
Stakeholders	• Over 40 stakeholder interviews (almost all with multiple attendees) encompassing statutory partners, VCFSE organisations, and key businesses and business associations. Interviews focused on issues of importance and concern in relation to LGR and Devolution • A leadership conference was held to develop common ambitions, involving key partners in statutory services, business, and civil society in Gloucestershire.
Place	• Engagement webinar for VCFSE (hosted by Gloucestershire VCS Alliance) with over 100 attendees • Engagement webinar for Town and Parish Councils hosted by GAPTC with over 100 attendees • Representation on Place Model workstream from NHS (ICB and providers), GAPTC, OPCC, SLCC, and VCS Alliance.
Staff	• Regular LGR staff communications and briefings • Senior officers from principal councils represented on all LGR workstreams, with different Chief Executives acting to lead and chair • Specialist service officers engaged in structured, cross-council aggregation and disaggregation workshops.
Council members	• Interactive all-member webinars • FAQs and other written briefings • Bespoke briefing and democratic processes delivered by individual councils.
MPs[60]	• Gloucestershire County Council Leader and Chief Executive monthly engagement with Gloucestershire MPs • Other district ad hoc engagement with local MPs
Other	• In addition to Place (above), workstreams conducted bespoke engagement as relevant. For example, the Vision and Ambition workstream conducted a range of briefings with senior district leaders to develop an understanding of place-based perspectives.

[60] At their meeting on 9 October 2025, Principal Authority Leaders agreed that Gloucestershire councils would jointly engage with local MPs to objectively gather their views on the published proposals, informing both councils and Ministers.

Additional reports

The online survey and in-person community events were co-designed and facilitated by an external specialist engagement organisation, *Cratus*. Their independent report can be found in Appendix 3.

The county council-led stakeholder interview exercise was conducted using consistent open questions. A short report detailing the key themes, together with information about the stakeholders engaged, can be found in Appendix 4. Following these interviews, some stakeholders chose to write to the county council offering views. Where appropriate, this correspondence is also appended.

Our learning and insights

Our learning themes synthesise the responses from a variety of methods and types used. As far as possible, we have avoided significant focus in this proposal on feedback on the relative merits of structural options, since the primary aim of engagement was to discover common concerns and ambitions of local people and organisations. However, some of this data, from the public survey and stakeholder interviews is shown for transparency. It should not be read as representative data on the preferences of the public and partners.

Three big themes have emerged:

1. Belonging in Gloucestershire
2. Service improvement
3. Vulnerable people and communities

Theme 1: Belonging in Gloucestershire

Our engagement revealed something powerful: people in Gloucestershire feel a strong sense of belonging - whether that's to a village, an estate, a district, or the county as a whole. Local identity runs deep, and it's clear that "home" means different things to different people.

This insight is crucial. It shows that the new council must enable participation and engagement at every level - recognising and supporting the many overlapping communities that make Gloucestershire unique.

Key actions to shape our proposals: Belonging in Gloucestershire (Theme 1)	
Place Model	Proposals for our locality arrangements have avoided prematurely drawing 'lines on maps'. We will deliver a carefully designed engagement and consultation process to develop the spatial scale, competency, and differentiation (by Place) of our Neighbourhood Partnerships. This commitment is reflected in our implementation roadmap.

Future Operating Model (FOM)	The differentiation of Gloucestershire's places is recognised in both the design principles and key features of the Future Operating Model. We have reflected place and identity strongly in engagement, commissioning, and service delivery features.

Theme 2: Service Improvement and Efficiency

Our survey captured a wealth of feedback on council services. Most areas scored well, with the majority of residents rating services as 'good' or 'very good'. However, roads, pavements, and streetlights stood out as clear concerns - mirroring national trends, where dissatisfaction with highways is common.

When asked what should shape future council services, 'community' - meaning representation, voice, and engagement - was the top priority. 'Transport' (including public transport, road maintenance, and connectivity) also featured strongly.

Stakeholder interviews reinforced this theme, highlighting the need for simpler, more efficient services and better integration with partners.

The message is clear: while there are specific areas to address, any improvement must be rooted in local context and connectivity - making sure services work for people and places across Gloucestershire.

Key actions to shape our proposals: Service Improvement and Efficiency (Theme 2)	
Vision and Ambition	Our vision and ambition includes a specific focus on the use of data to transform transport and wider public services. The feedback we have received on public transport in particular has assisted with shaping this ambition. Our vision and ambition also reflects the excitement and energy in the Gloucestershire business community to drive growth. We pay particular attention to the economic opportunities in Gloucestershire, and the desire to use LGR to accelerate our trajectory of breakthrough innovation in economic clusters, such as cyber, clean energy, and agri-tech.
Future Operating Model (FOM)	Our strategic enablement feature within the FOM is specifically designed to create capacity and capability to drive improvement and transformation.
Place and FOM	Our neighbourhood model is linked to service delivery within the FOM, with a proposed specification to tailor on a locality basis, addressing some of the feedback about different satisfaction and experience in different parts of Gloucestershire.
Financial Case	Our financial case shows our desire not simply to reorganise, but to transform. We will reinvest structural and transformation savings into services that people want to see improve. The council will feel local and responsive but be powered by scale and efficiency for the benefit of everyone.

Theme 3: Vulnerable people and communities

A key theme from our engagement with partners was the opportunity for the new council to do more for Gloucestershire's most vulnerable people and communities.

- **Community development and local engagement must be front and centre.**
- **There's real appetite for public sector reform.** From the emerging Neighbourhood Health Service to new powers for neighbourhood working, they see LGR as a chance to join up regeneration, health, and community development - especially where VCFSE organisations are already leading the way.
- **Tackling deep-rooted inequalities is essential.** We know there are sharp divides between urban and rural areas, and that data and lived experience is important to drive local action and smarter service design.

Respondents have made it clear that LGR offers a huge opportunity to address these challenges and opportunities.

Key actions to shape our proposals: Vulnerable people and communities (Theme 3)	
Vision and Ambition	Our vision makes it clear that we want to use LGR to spark a transformation in community empowerment. We can be closer to communities and people than before, e.g. utilising better and more widely the 'hub' approach to delivering preventive, community-led activity, as well as more tailored services for vulnerable people, families, and communities. We are also clear in our vision that we will more consciously link with partners on wellbeing, housing, climate action, and nature recovery – feedback is showing these are connected issues for local people.
Data, Digital and Technology (DDaT)	Our proposals are clear there are major opportunities to use DDaT to drive better environments, interventions, and services for vulnerable people. We have set out a bold ambition to develop a joined-up predictive analytics platform across adult and children's services, education, housing, and health.
Place	Our place research has revealed a wealth of current good practice in evidenced-based community development. We have hard-wired into our neighbourhood proposals a focus on community development, supported by data insight, the skills of our public health team, and dedicated staff and other resources.

Feedback on structural options

Both the survey and the partnership interviews provided feedback on structural options. This feedback is not based on a statistically reliable sample and it was not the purpose of either exercise. We expect the forthcoming Ministerial consultation to provide clearer data and information on local preferences for structural options. This exercise will be conducted once local people and organisations have had the benefit of considering proposals. The survey feedback is as follows:

A total of 225 respondents (7%) gave active preferences in open text responses concerning which unitary council option they would prefer from the three proposed at the time of survey. Of these, 205 preferred a single unitary council governing the whole county, 14 preferred the East/West option, and three preferred the Greater Gloucester option. Three people said they preferred two councils without specifying which option.

Implementation Roadmap

We've developed an implementation plan that sets out how Gloucestershire will move from submission of this proposal to Vesting Day and beyond. It's how we'll guarantee residents continue to access the support they need, safeguard statutory services, and lay the robust foundations for ambitious, ongoing transformation.

Whilst we continue to sharpen the details and map out specific activities, this section sets out our initial considerations and phases of activity. The key programmes set out in this section are likely to evolve over time as the national and local context and priorities change.

Our roadmap assumes that Gloucestershire County Council is designated within the LGR Structural Changes Order as a continuing authority. This approach will allow unnecessary costs and effort to be avoided, but is intended to have no impact on the change opportunity all current councils agree will be a major factor in delivering the 1UA proposal in the best interests of the people of Gloucestershire.

Framing our approach

Experience from previous LGR programmes highlights several factors that are critical to success for Gloucestershire:

- **Clarity of purpose:** a shared understanding amongst all organisations involved helps maintain momentum and alignment during planning and delivery, which will need to be undertaken collaboratively across all councils involved.
- **Early planning and mobilisation:** Early proactive planning (beginning before any MHCLG decision) is critical to manage delivery and improve implementation outcomes.
- **Robust portfolio and programme management:** LGR is complex and high stakes. We'll need a strong portfolio approach, with defined programmes, clear responsibilities, and the right resources in place to govern and manage delivery at pace.
- **Early appointment of senior leadership:** Recruiting into key posts such as the Chief Executive, S151 Officer, and Monitoring Officer early to provide leadership and stability.
- **Engagement and transparency:** Early, ongoing, and open communications is essential. Keeping staff, members, residents, and suppliers updated builds trust, enables proactive management of key risks, and provides confidence and reassurance to stakeholders.

Working together

All councils in Gloucestershire have agreed how they will work together in the run-up to MHCLG's decision and during the shadow period, ensuring that staff, members, partners, and residents remain confident in the process. Our shared principles are as follows:

Continue to involve all our staff proactively: we'll continue to keep staff from all councils actively involved in co-designing our journey to Vesting Day – drawing on their collective expertise to lead, design, and manage key LGR programmes.

Remain aligned around our shared future vision: we will stay focused on our shared vision for the new council and make the most of our collective strengths.

Open and honest communication and collaboration: We will continue to be transparent about activities, challenges, and decisions - with no hidden agendas - and commit to working in partnership across all seven councils.

Aligned decision-making and transitional support: As Vesting Day approaches, we'll agree practically how significant financial and other decisions are made across each council, and how we'll support each other – so that every council delivers on its existing plans and commitments. The transition programme will include a draft shadow constitution, a combined MTFS, a risk register, and a costed investment strategy to guide transition.

Invest in core skills: We'll need the right people in the right roles. That means bringing together not just technical specialists, but also standout leaders in programme management, procurement, change, and digital transformation. We'll harness strengths already in our councils – and invest in new talent and capacity wherever its needed – to make sure Gloucestershire's transition is expertly led from day one.

Roadmap to Vesting Day

The roadmap to Vesting Day is structured across five clear phases aligned with indicative timelines, based on MHCLG guidance.

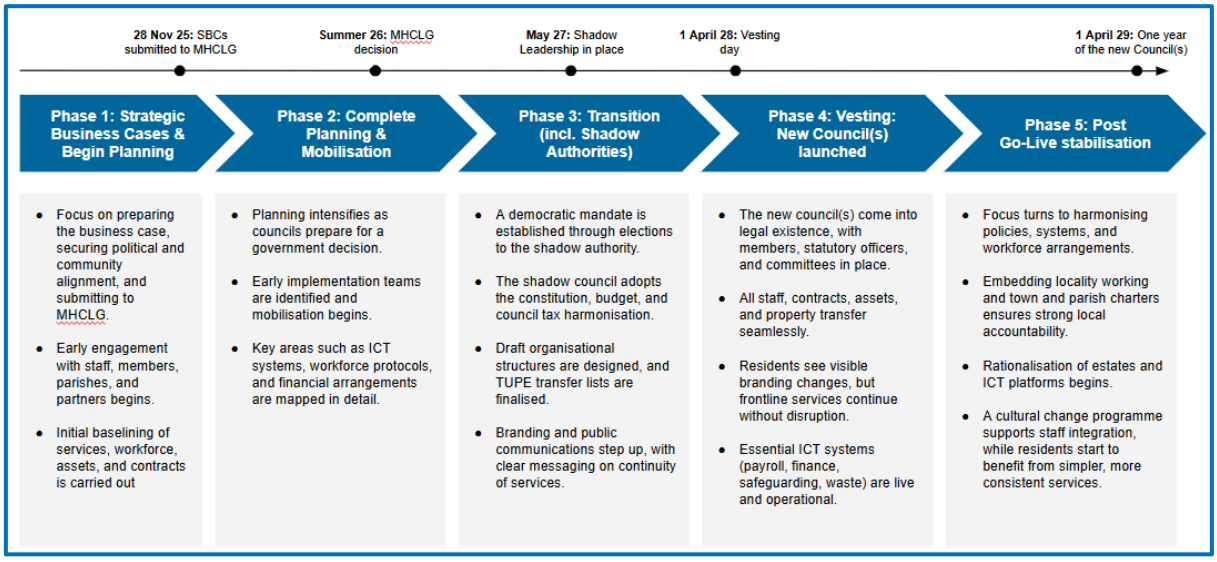


Diagram 4: roadmap to Vesting Day

High-Level Activities by Phase

Phase 1 – Strategic business cases (SBCs) and begin planning (to Nov 2025)

In this phase of work, councils focus on preparing and submitting the SBCs and starting to undertake preparatory baselining of key infrastructure across all seven councils (including workforce, assets, finances, policies, contracts etc). Continued engagement with staff, members, towns and parish councils, and partners ensures early buy in and alignment, which is critical for the coming months.

Some of the core activities in this phase will include:

- All seven councils in Gloucestershire will finalise and submit a SBC to MHCLG by 28 November 2025 (setting out all options for LGR that are under consideration)
- Each council will start to gather baseline data on current services, strategic risks, establishment data, assets, contracts, and vacancies to work towards a consistent baseline across all seven councils
- The joint LGR portfolio and programme management capability will be designed, setting out key roles, role profiles, and capabilities required including an overall LGR Portfolio Director
- A more detailed transition and implementation plan will be developed in line with the five key phases of activity
- Staff will start to be invited to join core LGR programmes (e.g. secondments etc) to support detailed planning and delivery work
- Councils will engage with town and parish councils to co-design a town and parish charter and initial governance approach.

Phase 2 – Complete planning and mobilisation (Nov 2025 – Summer 2026)

Detailed planning will continue to take place while awaiting MHCLG's decision, particularly preparatory work which would be required irrespective of which option is chosen. The full LGR portfolio, including core programmes, will be mobilised, with staff in place to lead and deliver activities. This phase is crucial to ensuring alignment and clarity on how transition will be managed so that activities can progress at pace immediately after a decision is made.

Some of the core activities in this phase will include:

- Portfolio management capability in place and actively running
- All core LGR programmes stood up with staff in place (either from existing councils or through external support being brought in where required)
- Detailed planning will be completed in readiness for MHCLG's decision, including timelines for key decisions such as Enterprise Resource Planning (ERP) selection and resident contact channels on Vesting Day
- All seven councils will focus on cleaning data to get it into a consistent and complete format across areas such as staff (aligning with finances), contracts, systems, assets, strategic risks, existing policy frameworks etc. This will enable the development of a consistent Gloucestershire wide baseline of core infrastructure, service delivery, and risks, which will need to be managed by the new council
- Implementation of Section 24 controls, as needed, to make sure significant financial decisions and contractual commitments made by the current councils do not adversely impact the new council
- Development of options and policies for managing the HR implications of staffing changes, covering vacancy management, joint approaches to recruitment, redeployment approaches, senior staff implications, pay and grading harmonisation, and benefits harmonisation
- Discussions with trade unions on managing the HR approaches to ensure early and proactive involvement and challenge
- Development of a detailed communication and engagement plan (internal and external)
- Continued staff and partner engagement through communications and co-design opportunities to consider service aggregation and delivery model opportunities
- Starting to create a shadow authority decision log, including areas such as the new council's budget, council tax, and policy requirements

- Early engagement with suppliers to consider any potential implications of contract novation and other key supplier issues
- Draft design of neighbourhood governance, form, and function.

Phase 3 – Transition (Summer 2026 – March 2028)

Councillors will be elected to a shadow authority who will lead the transition - making important decisions on how the new council will be governed and funded, and how council tax will be set. Behind the scenes, preparations will focus on getting staff, IT systems, buildings, contracts, and locality arrangements ready for Vesting Day. Communications and branding will help residents understand the changes and feel confident about what's coming.

Some of the core activities in this phase will include:

- Elections will be held (likely in May 2027) for a shadow authority which will, in turn, appoint key officers, approve the new constitution, set the budget, and decide how council tax will be aligned across areas
- Final TUPE staff transfer lists will be confirmed, and draft organisational structures will be developed and shared. Staff will begin to be recruited, trained, and sent letters confirming their roles, pay, and work locations
- The shadow authority will also agree on the new council's values, branding, and communications plan
- Detailed service transition planning and service operating models will take shape, with aggregation and disaggregation implications
- Pay dates and staff benefits will be standardised in agreement with trade unions to ensure consistency before Vesting Day (critical for equal pay considerations)
- Senior leadership positions will be appointed, including Chief Executive, S151 Officer, Monitoring Officer, and other key statutory roles such as Director of Adults Social Care (DASS)
- Asset and property registers will be updated, and health, safety, and compliance responsibilities clearly assigned
- Policies for transferring community assets and services will be developed (working alongside town and parish councils and the VCFSE)
- Engagement with suppliers will agree and formalise any contractual changes including termination, novation, and extensions
- Detailed design will progress for the key contact channels that residents will use on day one

- Neighbourhood Partnerships will be designed, costed, and implementation underway
- A Town and Parish Councils Charter and a Civil Society Covenant will be finalised, neighbourhood forums designed, and public-facing branding and communications stepped up, including the development of a new website for the new council
- The council's future operating model will be agreed, supported by a corporate plan that aligns services with strategic goals
- Financial support schemes like council tax and business rate relief will be aligned to ensure equity for residents
- Payroll arrangements for staff will be established
- The shadow authority will review and sign off the MTFS, investment plan, financial chart of accounts, and savings plans.

Phase 4 – Vesting: new council launched (1 April 2028)

All current councils legally cease to exist on 31st March 2028 (subject to decisions on continuing authority status for the county council). Staff, contracts, assets, and systems transfer to the new council. Essential services continue without disruption for residents. Residents will see new branding but experience continuity in delivery of services.

Some of the core activities in this phase will include:

- The existing councils will formally cease, with all staff, functions, assets, property, and contracts legally transferred to the new authority
- TUPE transfers will be completed, payroll will run without disruption, senior staff savings will be realised, and members will take up their roles under the new constitution with committee structures operational from day one
- All critical ICT systems - ERP, payroll, planning, ASC, CSC, safeguarding, waste, and the new electoral system will be live and stable (it is not anticipated that all systems will be aggregated / disaggregated on day one)
- Neighbourhood Partnerships will be live
- Staff will receive a new email address, but the majority will still be working on the same ICT hardware (laptops, phones etc) and from the same office locations on day one
- New phone numbers and email addresses for residents to contact the new council will be live, with redirects in place on legacy contact channels

- New branding will be rolled out on tax bills, vehicles, uniforms, and signage to signal visible change and reassure residents the new council is up and running
- Opening balance sheets will be agreed and predecessor accounts closed and audited
- Senior staff changes, including role realignment, redundancies, and benefits will be realised
- A high-profile public launch campaign will be delivered on day one and the immediate period thereafter to make sure there is appropriate awareness amongst residents, partners, and businesses.

Phase 5 – Post go-live stabilisation (April 2028 onwards)

In this phase of the programme, the focus shifts to aligning policies, systems, and workforce arrangements, embedding new ways of working, and delivering against the transformation opportunities identified to enable long-term design and delivery of the identified benefits.

Some of the core activities in this phase will include:

- Fees and charges will be harmonised through a single register
- Ongoing change management programme to embed new organisational values and behaviours, supported by engagement and communications with staff, partners, and residents
- Development and implementation of more detailed organisational structures (likely in a phased manner, aligned with service transition plans)
- ICT systems will be consolidated and rationalised over time, with cyber security and data governance strengthened
- Procurement policies will be harmonised and guided by a new supplier strategy, while estate rationalisation continues
- Customer service standards will be embedded consistently across services, supported by a FOM action backlog that drives harmonisation and redesign beyond day one
- Continued communications and engagement with all stakeholders including residents, partners, members, and staff.

Managing Delivery: Portfolio Structure

To oversee, manage, and deliver these transition and implementation activities, we will set up a robust portfolio and programme management structure.

Wherever possible, we would resource capacity and capability from across the seven councils by repurposing existing resources. There are likely to be certain capabilities or points during the five stages of the roadmap where we may need to bring in additional external capacity or capability to drive delivery at the pace required.



Diagram 5: LGR Portfolio Programmes

The scope of these 12 programmes could include:

Programme	Description
Communications, Engagement and Branding	• Internal and external communications and engagement strategies for partners, residents, staff, councillors • Design and agreement of new branding • Public launch campaign • Monitoring effectiveness of communications with feedback loops to other programmes to act on sentiment and feedback.
Governance and Legal	• Design and adoption of the new constitution and governance structure • Leading the legal establishment of the shadow authority, including oversight of elections • Developing and embedding scrutiny arrangements • Legal transfer of functions and statutory responsibilities from predecessor councils • Policy oversight, ensuring that critical policies are in place for day one and that no decisions are taken that undermine continuity

Programme	Description
	• Legal assurance for implementation decisions and considerations, including service specific considerations such as transfers of assets and contracts.
Finance and Risk	• New financial structures and chart of accounts • MTFS, annual budget, and statement of accounts • Implementation of Section 24 controls • Managing and delivering council tax harmonisation policies • Opening balance sheet and closure/audits of predecessor accounts • Development and management of the strategic risk register.
Performance	• Developing performance frameworks to measure delivery of the transition and implementation portfolio • Establishing metrics to track service continuity, staff engagement, ICT readiness, and financial stability • Management of the benefits realisation framework.
Property and Assets	• Property and asset implications, including rationalisation opportunities, development of asset and estate strategy, and investment properties • Consolidated asset and property register • Ensuring health and safety responsibilities for all property and assets are clearly assigned • Supporting the transfer of ownership of all land, buildings, and property rights from predecessor councils • Delivering against the estate rationalisation programme ambitions.

Programme	Description
Digital, Data and Technology (DDaT)	• Ensuring all critical ICT systems are operational on day one, including ERP, payroll, safeguarding, and operational service systems • Design, procurement, and implementation of a new ERP system • A new email address for all staff on day one • Ensuring legacy systems can integrate or run in parallel where required • Longer-term system harmonisation and embedding of cyber security and data governance practices • Developing and delivering against data migration requirements from predecessor councils, with a focus on security and GDPR compliance.
Customer Contact	• Designing the customer journey for the new council, agreeing the balance between online by default and other forms of access and engagement. • Establishing clear customer contact points for Vesting Day, including phone numbers, websites, and email addresses • Ensuring legacy contact channels redirect residents seamlessly to new channels • Embedding consistent customer service standards across all services during the stabilisation period.
Development of the FOM (incl. service redesigns)	• FOM blueprints and implementation plans for the new council • Where needed, supporting specific services (e.g. leisure) to manage aggregation/disaggregation implications and consider operating model choices.
People and Culture (incl. OD)	• Baselining workforce structures and establishments across all current councils • Redeployment and recruitment processes

Programme	Description
	• TUPE transfers • Harmonisation of pay dates and benefits in negotiation with trade unions • Staff engagement programme, including opportunities for staff to join LGR programmes and co-design services • Cultural change projects to embed new organisational values, identity, and ways of working.
Neighbourhoods and Communities	• Design, consultation, and implementation of Neighbourhood Partnerships including elements which relate to Neighbourhood Area Committee legislation • Policies for parish asset and service transfers • Towns and parishes engagement • VCFSE engagement • Town and Parish Charter and Civil Society Covenant • Community engagement (non-geographic), including corporate and service approaches to resident and stakeholder engagement and participation
Devolution	• Political and strategic engagement with senior leaders on long-term devolution options • Planning for potential strategic authority over the medium/long term.
Procurement, Contracts and Commercials	• Baselining of all contracts and external spend across all seven councils • Identification of key contracts for novation and engagement with suppliers • Harmonisation of procurement policies

Programme	Description
	• Exploring further opportunities for commercialisation, joint arrangements, and income generation.

Table 18: the proposed scope of each LGR programme

Portfolio and Programme Management

A Portfolio and Programme Management team will be established to oversee, coordinate, and manage delivery of the implementation roadmap - anticipated to be in place until at least March 2029.

The team is likely to consist of a range of programme, transformation, and change roles, and will be at the heart of managing the overall transition and implementation portfolio. This includes:

- Detailed planning and management of progress
- Enabling consistency across all LGR programmes
- Supporting the overall governance arrangements of the portfolio
- Providing regular progress reporting and internal assurance
- Developing and delivering the benefits realisation plan
- Working closely with the programmes in the portfolio, including in managing risks and interdependencies.

Managing strategic risks

There will be a range of strategic, operational, and service level risks associated with transition and implementation. Strategic risks will likely include:

Risk	Potential Mitigation
Potential delay in Vesting Day timelines nationally - There is a risk that changes or slippage in the agreed national timelines for the LGR process will undermine our ability to plan and sequence key activities effectively. This could lead to misalignment across programmes,	Establish clear checkpoints both with MHCLG representatives and locally to monitor timelines and make sure there is early notification of any potential delays or changes in national timelines particularly around Vesting Day.

Risk	Potential Mitigation
reduced stakeholder confidence, and delays in achieving critical milestones.	
Scale and complexity of change - The level of change involved for all seven councils is significant (e.g. changes to how residents are engaged, policies, processes, organisational structures, leadership and culture, new services being delivered etc) and needs to be delivered and managed in very short timescales.	• Develop a detailed transition and implementation plan which enables a smooth transition (as far as possible) • Implement a robust portfolio and programme management capability as soon as possible to help manage and drive change, including managing interdependencies and risks.
Capacity and capability to support transition and implementation - There is a risk that we struggle to bring in the right capacity and capability to drive delivery alongside maintaining BAU service delivery for our residents and communities.	• Identify early the key resources required to enable successful delivery, including any subject matter experts. Engage with other councils who have been through LGR to identify resourcing needs • The seven councils to consider where existing resources can be redeployed or reprioritised to support transition and implementation, including opportunities for secondments into the LGR portfolio • Set aside specific funding as part of the overall transition investment to bring in additional external support where needed and support backfill arrangements.
Maintaining service continuity – Most service areas will be impacted by LGR and will need to be involved	• Prioritise the principle of being 'safe and legal' on day one, with

Risk	Potential Mitigation
in supporting the portfolio (including service transition planning). There is a risk that service performance or continuity could be adversely impacted during transition or immediately post Vesting Day.	no resident experiencing a worse service than they do currently • Develop a prioritised service transition plan to manage the transition and transformation in a phased manner • Form early working groups for core service areas (across all seven councils) to undertake detailed transition planning - making sure any considerations for maintaining operational service continuity can be managed e.g. systems access.
Financial sustainability - There is a risk that the transition budget is insufficient to cover unexpected or unforeseen circumstances or that the savings that have been identified cannot be delivered.	• Contingency has been built into the transition costs to account for unexpected circumstances • A clear benefits realisation framework will be established to track and manage benefits delivery • The portfolio and programme management capability will be responsible for making sure there is a tight grip on all costs and benefits associated with LGR, so any financial risks can be proactively identified and mitigated.
Alignment with key stakeholders - There is a risk that key stakeholders including staff, partners, members etc are not aligned with the vision for the new council or experience change	• Establish early a clear communications and engagement strategy for all stakeholders and agree key messages for each group at different stages of the implementation

Risk	Potential Mitigation
fatigue from the level of change and disruption they are going through.	• Involve stakeholders early on to help co-produce plans • Dedicated change management resource to help embed the change successfully • Investment in leadership and managerial development so that they are equipped to support staff and engage with partners.

Table 19: strategic risks and mitigations

Managing the Aggregation of Services

Bringing seven councils together is a major undertaking - and keeping services running smoothly for residents is our top priority. **Aggregation means uniting services, systems, and teams into a single structure, unlocking better coordination, less duplication, and more consistent delivery across Gloucestershire.**

We'll manage the challenges and opportunities presented from aggregation by:

- **Enabling services to lead design:** The people who know services best will shape how delivery changes - ensuring practical solutions and continuity for residents
- **Managing existing shared service and wholly owned company arrangements:** Shared services like Ubico, One Legal, and Publica already show the power - and complexity - of joint working. Where aggregation is straightforward, we'll keep it simple; where it's more complex, we'll manage the transition carefully, including TUPE and out-of-county partners, such as West Oxfordshire District Council
- **Considering data and system aggregation:** Consolidating IT and data platforms will drive savings (likely in later years) and consistency, but we know it takes careful planning and upfront investment
- **Keeping services local:** Even as we aggregate, we're committed to place-based delivery - tailoring services to local needs and making Neighbourhood Partnerships central to our approach

- **Strengthening our workforce:** Aggregation lets us pool talent, invest in skills, and create new career pathways - especially in high-demand areas like cyber, data analytics, and surveying
- **Driving prevention through integration:** By bringing together district and county services, like public health, housing, leisure, and planning, we can drive improved outcomes for residents, such as tackling the wider determinants of health at greater scale.

Appendix 1: Vision and Ambition ‘Personas’

CHARLIE’S BIO	
	Charlie is a 15-year-old student living in Parkend. His area has limited public transport and he feels disconnected from school and community life. His school engagement is low, and he is often absent or disengaged in class. With limited access to youth facilities, Charlie spends most of his time online, often unsupervised.
DESIRES	**CHALLENGES**
Charlie is digitally curious and likes learning and connecting with people online.	Emotional isolation, lack of trust in adults, feels invisible in the community, vulnerable to online radicalisation and has limited access to safe youth spaces.

BRINGING OUR VISION AND AMBITION TO LIFE

- ✓ By co-creating services that work for everyone, Charlie gains access to safe, inclusive digital and physical spaces shaped by young people like him.
- ✓ Digital services connect him to mentors and wellbeing resources, reducing isolation and offering healthy alternatives to unsupervised online use.
- ✓ Collaboration between community groups, schools and digital platforms helps rebuild Charlie’s trust and sense of belonging.

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- Driving Breakthrough Innovation for National Resilience: Forest of Dean becomes a pilot site for ‘Project Beacon’, an initiative using AI-powered early intervention tools, leveraging expertise from the Golden Valley Cyber Hub in Cheltenham These tools spot early signs of disengagement and connect young people like Charlie to trusted mentors and support networks. Workshops, both in-person and online, build digital resilience across the county in partnership with schools, the police and industry.
- Creating Together: Inspired by Project Beacon, Charlie becomes involved with the Forest Voluntary Action Forum (FVAF). Working alongside community groups and local mentors, he helps design online platforms that promote resilience and peer support, as well as new youth activities that reflect what young people actually want. This gives Charlie a stronger sense of belonging, builds his confidence and ensures services are responsive to the needs of all generations.

THE V**ARMA** FAMILY'S BIO



Priya (34 years old) and Arjun (33 years old) live in rented housing in Cheltenham with their young son, Ravi (9 years old) who has additional learning needs. Like many families in the town, they are balancing work, caring responsibilities and the rising cost of housing.

DESIRES	CHALLENGES
Priya and Arjun are eager to retrain to another industry to better financially support the family. Ravi enjoys music and building things.	The family struggles with insecure housing, long assessment wait times and navigating the education, health and social care services. Priya and Arjun feel stuck in low-paid work and torn between caregiving responsibilities and pursuing career opportunities. Meanwhile, Ravi feels behind in school due to overstimulating environments and a lack of tailored learning approaches.

BRINGING OUR VISION AND AMBITION TO LIFE

- ✓ By co-creating services that work for everyone, Arjun and Priya can help shape flexible training and SEND support that fits their family's real needs.
- ✓ Using digital inclusion initiatives, Ravi has access to secure, joined-up learning tools that support his education needs both in and out of the classroom, and give his parents visibility of his progress.
- ✓ Through linking housing skills and innovation locally, Arjun and Priya can take up retraining opportunities without moving away or compromising Ravi's care

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- Using Data to Transform Transport & Services: Integrated data systems link Ravi's SEND support, the family's housing needs, and the parent's retraining. Because services communicate, the social care professionals are able to provide the Patels with proactive care. It is through this better data integration that Arjun and Priya are offered a suitable retraining programme through the Talent for Life initiative.
- Unlocking Talent, Skills & Housing for Inclusive Growth: Through linking housing, skills and innovation locally, Arjun and Priya can retrain in secure jobs while knowing Ravi's care and education are supported close to home. This gives Ravi access to new learning opportunities from tailored digital tools to his family's attendance at 'taster days' in local industries, helping him discover his own future pathway.
- Driving Breakthrough Innovation for National Resilience: Ravi discovers a passion for advanced manufacturing through hands-on activities at local skills hubs. With access to mentoring, modern equipment and real-world projects linked to clean energy and sustainable production, he is able to see how his interests connect to solving national challenges. As he grows up, these opportunities give him the skills and confidence to pursue a career in advanced manufacturing, contributing directly to Gloucestershire's role in building resilience for the United Kingdom.

MARGARET'S BIO



Margaret (82 years old) lives alone in a small flat in Gloucester City. She has limited mobility and digital literacy, and no nearby family. Before retirement, she used to work in a garden centre where she enjoyed advising customers on garden needs.

DESIRES	CHALLENGES
Margaret has a strong desire to be a part of the community and is willing to engage if supported.	While public transport is available, she finds it difficult to navigate without support and feels overwhelmed by the pace of digital change. This makes it hard to access services or stay socially connected. She feels forgotten by the fast-changing world around her. She wants to remain in her own home for as long as possible and her family need assurance that she can be safe and cared for.

BRINGING OUR VISION AND AMBITION TO LIFE

- ✓ Co-designed neighbourhood and health services reflect Margaret's needs and preferences, restoring her dignity and independence.
- ✓ Digital inclusion initiatives supported through LGR, give Margaret the confidence to use online health services and stay socially connected.
- ✓ Local community groups and health providers collaborate to bring companionship and tailored wellbeing support directly into her neighbourhood, reducing isolation.

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- Putting Wellbeing, Housing & Nature Recovery at the Heart of Growth: Every policy and service in Gloucestershire is shaped by a wellbeing-first approach, ensuring Margaret's needs are central. From transport to housing, decisions prioritise her dignity and independence helping her remain at home and part of her community. Over time, this creates a fairer community where ageing is fully supported.
- Empowering Communities through Co-Design & Local Decision Making: Margaret contributes her experience to a local Neighbourhood Partnership, shaping age-friendly housing ideas and intergenerational community projects. This gives her a place in the community while ensuring older residents' voices are embedded in local decision-making.
- Using Data to Transform Transport & Public Services: Trusted, real-time data links Margaret's health, housing and care needs, ensuring services coordinate seamlessly. Her GP and social care team receive the same up-to-date information, avoiding duplication and preventing issues from escalating. Her family also gets reassurance through regular wellbeing updates.

EMILY'S BIO



Emily (26) lives in Cirencester. She works part-time in admin and has caring responsibilities for her family. She is passionate about sustainability and wants to pursue a career in the field without leaving her district. However, she's not sure if that is possible within Gloucestershire. From her knowledge, she feels she needs to move to other areas like Bristol and London to access the opportunities she is looking for, an option not available to her

DESIRES	CHALLENGES
Emily wants to find flexible, on-the-job training opportunities that offers career mobility, alongside care support for her father so she doesn't have to compromise on her ambitions.	Emily struggles to find local green skills programmes that are flexible, adaptable to her schedule and will help secure her a job in the industry. She feels torn between her caregiving responsibilities and her aspirations.

BRINGING OUR VISION AND AMBITION TO LIFE

- ✓ Breakthrough innovation in clean energy and climate technologies creates local career pathways that allow Emily to stay close to her family while contributing to a globally significant sector.
- ✓ Collaboration across transport and training clusters connects her to opportunities in Stroud and Severn Edge.
- ✓ Digital tools support remote learning and flexible work, helping her balance ambition with caregiving.

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- Unlocking Talent, Skills & Housing for Inclusive Growth: Emily accesses flexible, online training tailored to her caregiving schedule, gaining credentials in clean energy. This allows her to build a local career in sustainability without sacrificing her family responsibilities whilst also connecting Emily to high potential sectors across the whole of Gloucestershire.
- Harnessing Digital to Tackle Inequality: Digital inclusion projects mean Emily can use high-quality online learning platforms and remote working hubs in the Cotswolds, supported by affordable transport to training centres for in-person learning.
- Driving Breakthrough Innovation for National Resilience. By linking into Gloucestershire's growing clean energy sector, Emily gains placements and mentoring that tie her personal goals to the county's contribution to net zero and energy security. Within a decade, she leads a flagship initiative promoting green fuel and zero-carbon mobility for visitors to the Cotswolds AONB.
- E**mpowering Communities through Co-Design and Local Decision Making:** Emily connects with peer support groups through local Family Hubs, finding access to wellbeing and respite care support. This provides visibility of a pathway for Emily to achieve her career goals and care for her loved ones.

RACHEL'S BIO



Rachel is in her mid-30s and lives in Bussage with her two children. She commutes daily to Bristol for her job in marketing. The journey is long and expensive, with poor rail connections. She spends hours in traffic and pays high parking fees in Bristol. She's considering remote work or relocating but loves her home and community in Stroud.

DESIRES	CHALLENGES
More time with family and friends, affordable and direct commuting options, local work flexibility. She hopes to grow her career, ideally without having to relocate.	Whether rail or car, Rachel's commute has caused her stress. She feels like she has little to no time to enjoy life during the weekdays. Her mother is currently helping with school pick-up but has expressed a desire to relocate outside of Stroud.

BRINGING OUR VISION AND AMBITION TO LIFE

- ✓ By shaping local transport priorities through local community forums, Rachel has a voice in decisions that directly affect her daily life. .
- ✓ Improved connectivity enables hybrid working, reducing the need for Rachel to commute daily.
- ✓ Smart mobility platforms give Rachel real-time journey planning, reliable timetables and targeted pothole repairs that make her routes safer and quicker.

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- Using Data to Transform Transport & Public Services: Strategic partnerships underpinned by employee migration data make the case for improvement in regional connections. This reduces costs and journey times for Rachel. Smart data systems also prioritise road maintenance and pothole repair, making daily travel safer and more reliable. Together, these improvements give Rachael a quicker, more affordable commute and more family time all while ensuring she can progress in her career.
- P**utting Wellbeing, Housing & Nature Recovery at the Heart of Growth**: Transport and housing are planned with wellbeing in mind. Rachel benefits from community facilities linked to commuting routes, making family and work easier to combine.
- Harnessing Digital to Tackle Inequality, Improve Services and Drive Innovation: Rachel uses digital platforms to plan hybrid working and smarter travel, helping her stay rooted in Stroud while keeping access to regional career opportunities in the sectors where she has the most skills.

DARREN'S BIO



Darren (52 years old) lives in Bishops Cleeve. Darren has been working hard to overcome addiction and is determined to build a new life. He wants to work and contribute more to his community but faces stigma and limited access to tailored employment support. He's proud of his recovery and seeks meaningful ways to stay on track and help others.

DESIRES	CHALLENGES
Darren wants a stable employment that can enable him to be financially independent. Inspired by the support he has received from health and social care professionals, he wants to contribute and give back to those in need.	Darren feels socially isolated and is conscious of being judged by others. He has yet to find a stable job in Tewkesbury that will give him financial security, causing him stress, which he fears may cause him to relapse.

BRINGING OUR VISION AND AMBITION TO LIFE

- ✓ Integrated services mean Darren can access recovery, housing advice and employment support in one place, removing the barriers he previously faced navigating separate systems.
- ✓ Local employers and VCFSE partners offer supported routes into meaningful work, helping Darren rebuild confidence while contributing to his community.
- ✓ Digital tools track Darren's progress and connect him to peer networks, reinforcing his recovery and helping him sustain long-term stability

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- Putting Wellbeing, Housing & Nature Recovery at the Heart of Growth: Darren accesses a new joined-up wellbeing and employment hub model that integrates housing advice, health support and training opportunities under one roof. Unlike existing services, the hub is embedded in local housing and regeneration projects, giving Darren stability in his home environment as well as tailored pathways into work. This integration reduces the stigma he's faced in fragmented systems and helps maintain recovery.
- Empowering Communities through Co-Design and Local Decision Making: Darren helps co-design recovery-to-employment programmes with local employers and VCFSE partners in Tewkesbury. His lived experience is treated as expertise, shaping more inclusive pathways that others in recovery can access. Over time, Darren takes on a mentoring role, feeding into decision-making that improves services county-wide and strengthens trust between residents and providers.
- Unlocking Talent, Skills & Housing for Inclusive Growth: Darren joins a reskilling programme linked to local employers, with wraparound housing and wellbeing support. He starts with part-time work at a social enterprise in Bishop's Cleeve, progresses into a supervisory role and ultimately secures a qualification that allows him to mentor others. By linking employment with social support, Darren's recovery is reinforced while also contributing to Gloucestershire's inclusive growth.

Appendix 2: Digital, Data, and Technology Case Studies

Digital, data, and technology (DDaT) are already transforming services across Gloucestershire – making them smarter, faster, and more joined-up. These examples show how a customer-centred, data-informed approach improves outcomes, reduces avoidable demand, and enables proactive service delivery.

Right now, delivery varies by council. But applied across a single council, our DDaT approach unlocks consistent, high-quality services for everyone – wherever they live.

Case study 1:

Customer experience

Streamlining and opening up data through AI (Tewkesbury BC)

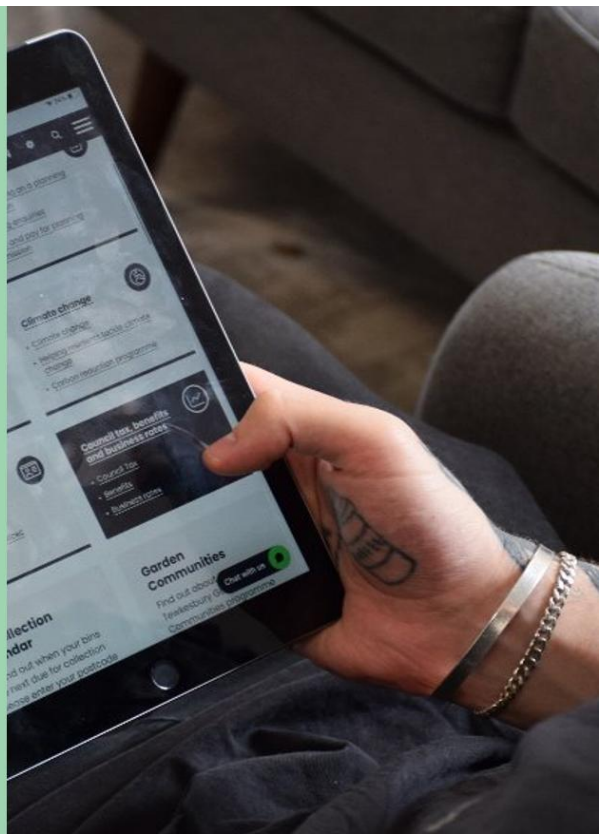
AI is redefining our customers' experience over the phone and online - there's no longer a need to navigate a lot of webpages or a maze of phone options (or to sit waiting on hold).

The customer types their issue into a responsive AI-driven chatbot online or speaks through a Large Language Model assistant over the phone (with a single phone number for all issues). If the issue is particularly complex, the customer seamlessly passes through to a human advisor who already knows why they're calling. If the teams are particularly busy, a simple call-back option is offered.

Residents are less frustrated, receive support quicker and have more confidence in contacting the council when they need help.

Real-time dashboards mean teams manage demand dynamically, and seamless integration into the council's digital platform means that customer contact can trigger automatic workflows depending on what they're contacting about.

50%	38%	17%
reduction in wait times in 6 months	shift to online services in 6 months	decrease in abandoned calls in 6 months





Case study 2:

AI virtual care

Helping vulnerable residents live in their own homes for as long as possible (Gloucestershire CC)

Innovative AI-powered virtual care will help transform how social care is delivered. Using smart plugs, motion sensors and other remote devices installed in residents' homes to monitor daily activity and wellbeing.

Devices feed data into a technology-enabled care system (recently procured by Gloucestershire CC), which uses AI to detect changes in behaviour that may signal a health concern.

The proactive approach allows care teams to intervene early – before a crisis occurs. In Sutton, this has led to around 25 residents per month being supported by community response service, avoiding ambulance callouts and hospital admissions.

The technology supports residents to live independently for longer, with the reassurance that help is available 24/7. It also eases pressure on overstretched adult social care services.

Case study 3:

Bulky waste

Reducing demand by keeping customers updated (Tewkesbury BC)

Bulky waste bookings take place through an intuitive online booking system – no need to call or visit (although that option is available).

The online experience is really enjoyable. Information is clear and there's a basket for items to be added, and an integrated payment system – nowhere close to the traditional clunky online local gov experience. Residents get to choose a collection date that suits them from a calendar of availability.

Through automated communications, residents are kept informed at every stage of the process - from booking confirmations to collection updates. These messages, delivered via email and text, are clearly branded and consistent with the council's digital identity.

Live data integration allows collection crews to update the system in real time, enabling customer services to respond swiftly to any queries.

Similar proactive approaches will be used for missed bin reports, planning applications and many other services.

In six months:

60%	70%	261%
collections booked online	of items now recycled	rise in income





Case study 4:

Open Digital Planning

MHCLG-funded programme to improve planning online (Gloucester City and Tewkesbury BC)

MHCLG's Open Digital Planning is transforming the planning service through systems that reduce invalid applications, improves customer experience and streamlines internal processes.

Plan X uses spatial data to assess site-specific constraints and guides users online through a tailored, question-based journey. This empowers applicants to self-serve, reducing calls to the council and improving the quality of submissions.

Through further development the system will integrate with Idox Uniform, enabling applications to be submitted directly and automatically populate back-office systems.

Gloucester City is also part of Back Office Planning System (BOPS), which is being developed with planning officers to improve the planning process - their input will help shape the system ensuring it meets the needs of planning officers and reduces the double handling and outdated processes in legacy back office systems.

- **Plan X:** Avg 113 visits per week for 'do I need planning permission?' tool (Glos City and Tewks BC).
- **BOPS:** 20% reduction in householder application processing time (Glos City).
- **Plan X:** Ratings of 'excellent' and 'good'.

Case study 5:

Flooding

Using spatial data to protect vulnerable residents (Tewkesbury BC)

A data-informed approach helps keep flood-risk communities and vulnerable residents safe.

With the introduction of a new digital system in ArcGIS, we can capture information quickly and accurately. Integrating satellite imagery with other datasets (such as the EA river gauge imagery and rainfall) means we can create predictive models of flood extent and impact.

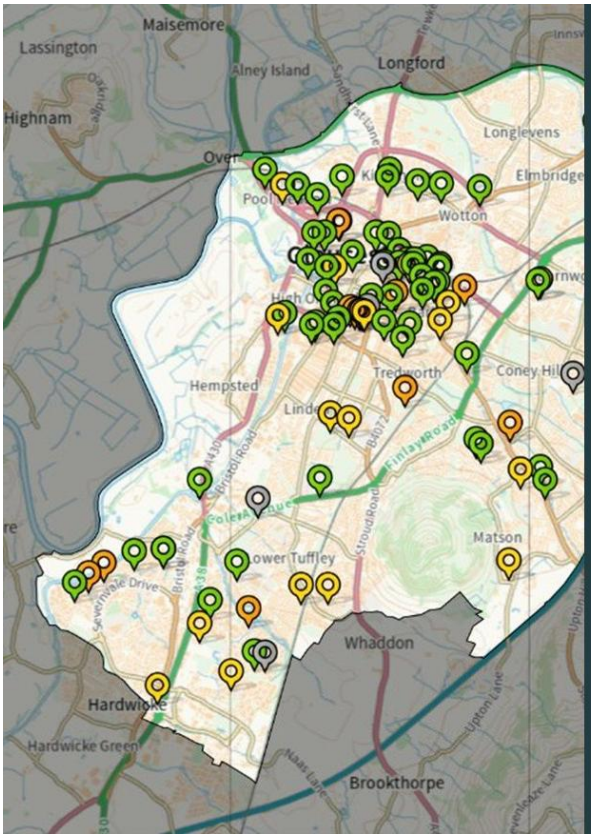
We know what different river levels mean on the ground, and mapped data will show where to direct support, such as:

- Where sandbags and rest centres are best located
- Which householders require targeted alerts and information
- Which vulnerable residents need welfare checks

This approach isn't just about reacting, but about being proactive in supporting at-risk communities.

LGR will enhance this approach even further by enabling a unified, cross-county view of flood risk and response. It allows for the consolidation of data sources from county and district councils, streamlined decision-making, and coordinated deployment of resources - ensuring that support reaches the right places faster and more effectively.





Case study 6:

Fix My Street

Fix My Street, a simple, map-based tool, lets residents report issues like potholes, fly-tipping, and broken streetlights via the web or mobile app.

Users drop a pin, add details and photos, and the report is sent directly to the right team—whether that's the City Council, UBICO, or the County Council.

The system links with in-cab tech, asset layers, and back-office systems to ensure accurate routing and real-time updates for crews. A public map shows reported issues and progress, improving transparency and removing the need for users to understand council responsibilities.

This streamlines service delivery, reduces call volumes, and improves the quality of reports across multiple authorities.

- City council: Average time to resolve issues dropped from **5.25 days** (previous process) to **1.25 days** with FixMyStreet and Alloy integration.
- GCC and city council: Of 198 city council cases reported to the county's FixMyStreet, **100% were automatically routed** to the city council **without any manual intervention.**
- GCC: **60% of highways issues** now reported through FixMyStreet – an increase of 20% on old process.

Case study 7: CoPilot

Gloucestershire CC: Average hours saved per week on different activities using M365 Copilot



Future Gloucestershire
Digital, Data and Technology workstream

Hours saved per week based on feedback received from 127 users

Appendix 3: Public Engagement Report (Cratus)

Cratus group

We're more than an agency.
We're change makers.

Gloucestershire Local Government Reorganisation Public Engagement

August 2025

Executive Summary

Between July and August 2025, Cratus Group engaged residents and stakeholders across Gloucestershire to gather views on Local Government Reorganisation (LGR). The programme combined 12 in-person events, two countywide webinars, and a countywide survey which in total generated more than 3,100 responses. A dedicated microsite and multi-channel campaign ensured broad reach across all six districts, though younger residents were notably under-represented.

Residents expressed a strong sense of belonging to their communities, with green spaces, safety, and access to essentials like buses and GPs ranked as the most important local priorities. Council services such as rubbish and recycling, libraries, and parks were generally well regarded, while roads, pavements, buses, and aspects of social care received lower satisfaction ratings. Respondents experience of engaging with councillors and/or council officers was relatively positive.

When considering the future of local government, most respondents prioritised making services better and ensuring council tax is well spent over issues of identity or representation. Community identity, transport infrastructure, housing, and environmental protection were the most commonly prioritised themes in the additional written feedback. Many residents are wary of change, as shown in the written feedback and noted in our conversations. In terms of those who gave a preference as to which model they felt would work best, a single countywide unitary was by far the most supported option. The East/West split and 'Greater Gloucester' model were widely opposed, with concerns about fairness, division, and efficiency.

The next stage of communication should focus on reassurance: showing that local voices and identities will not be lost, underlining the financial and service benefits of change, and clarifying how the new system will work in practice. Simplification of council responsibilities is a persuasive message, but trust will depend on continued engagement and transparency throughout the process.

Introduction

This report summarises the engagement activity undertaken by Cratus Group in Summer 2025 on behalf of Gloucestershire councils around the future of local government in the county and sets out an analysis of the feedback received.

Please note that throughout this report, for brevity, we use the term 'district' to refer to city, borough and district councils in Gloucestershire. Percentages are rounded to the nearest whole figure for neatness.

Background and context

The Local Government Reorganisation (LGR) community engagement programme in Gloucestershire was initiated to gather views from residents, stakeholders, and partner organisations on the future shape and priorities of local government in the county. This work forms an early stage in the process of developing proposals for submission to Government in November 2025.

The aim was to engage communities across all six districts, ensuring that a broad range of voices contributed to the discussion. Importantly, this engagement did not ask people to choose between fixed options or vote on pre-defined models. This will be the focus of formal Government consultation during the early part of next year. Instead, it invited open conversation about the principles, priorities and values that matter most to people in Gloucestershire.

By building understanding and listening to what communities have said they want and need, the engagement sought to generate insights that will help inform decision-making later in the year. The process was designed to be transparent, inclusive and accessible, ensuring that residents could help inform the county's future governance arrangements.

Objectives

- To inform residents about the context for potential changes to local government in Gloucestershire and the reasons for exploring these changes.
- To understand people's priorities, values and concerns in relation to the organisation of local government and the services it provides.
- To engage as widely as possible across all districts, reaching communities in both urban and rural areas.
- To gather insight that can be used to support councils in the development of proposals for submission to Government in November 2025.

Methodology

The engagement was undertaken using a hybrid approach, combining online and face-to-face engagement to ensure broad coverage and accessibility.

We followed the principle of 'going where the people are', integrating with existing community events and venues to reach a diverse cross-section of residents, while also providing digital channels for those who preferred to take part online.

In person engagement included a set of materials summarising the changes and signposting to the survey.

Survey

A county-wide survey was the central element of our public engagement. Hosted on Gloucestershire County Council's Engagement HQ platform, and developed with input from all seven councils, the survey included a blend of closed and open questions. This approach allowed for both quick responses and more detailed commentary.

- The survey was open to the public from **1 July to 8 August 2025**.
- The full list of questions is available in Appendix 1.

Engagement and demographics

We achieved high levels of engagement, with over 3,000 responses received. The demographic reach was also strong, with the distribution across most categories closely aligning with the general demographic makeup of the county of Gloucestershire, with the caveat that women were slightly over-represented (53% vs 51% in the 2021 Census) and the respondents skewed slightly older than the general population (33% over-65 vs 22% in 2021 Census). This suggests a broad range of residents chose to participate.

It is important to note that a digital survey of this nature is a self-selecting process rather than a representative poll. This means that people chose to engage with the survey, whether they found it online via social media or council content, or participated in person with a member of our team. Unlike a representative poll, we did not actively contact individuals with the aim of reaching a

statistically significant and truly representative sample of the county's or districts' populations. This was not feasible within the project's scope, budget, or timeframe.

Despite not being a statistically representative poll, we are confident that the feedback is robust and highly useful. The high level of engagement and the broadly representative nature of the respondents' demographics mean that the data provides clear and valuable trends. This feedback is therefore a reliable resource for councils as they develop local government reorganisation (LGR) options.

Note: While the data aligns broadly with 2021 Census data for the county, this has not been assessed at a District level so we cannot assert that the views expressed are representative of individual Districts.

The survey achieved good, useful results at a fraction of the cost and time a full-scale representative poll would have required, proving to be an effective and efficient engagement tool within the project's constraints.

Microsite

A dedicated microsite – www.futuregloucestershire.gov.uk – was created to provide background information on LGR, answer frequently asked questions, and list details of upcoming engagement events and webinars. It also provided a direct link to the survey, ensuring a single point of access for the public.

Outreach and marketing

To maximise reach, the survey and microsite were promoted through a range of channels:

Elected members and council officers
Councillors and officers received information to share with their networks, including a set of informational banners and flyers provided for each district council. Staff across district councils and partner organisations were reached through newsletters and intranet posts.

Gloucestershire County Council officers attended the parish and town council AGM in July to share information.

Residents and community networks
Social media activity included both organic and paid campaigns. Paid advertising targeted postcodes with lower response rates during the final two weeks of the engagement.

Posts were shared by each council's communications team via Facebook, Instagram, X, LinkedIn and Nextdoor, alongside digital newsletters, community bulletins and business mailing lists. Flyers were also sent to libraries and other council owned buildings across the county.

Events and webinars
In-person engagement took place at two existing community events in each of the six districts, and two online webinars were held to enable countywide participation. All activities were designed to ensure residents could access clear information, ask questions, and provide feedback in a way that suited their needs.

Engagement summary

As a result of online promotion, 12 in-person events (two per district) and 2 online webinars with countywide attendance, 3,112 survey responses and 1,480 written comments to open-text questions, providing rich qualitative insight, were received.

Events brought conversations into the heart of communities – from busy market towns to rural villages, whilst the online offer ensured residents could take part at any time. This mix of formats generated a balanced evidence base: hard data from the survey for statistical analysis, and detailed personal perspectives from written feedback.

Engagement findings

Events

The 12 events are detailed in the following section, with approximate figures for the engagement at each.

Teams attending the events had flyers to hand out, pull-up banners at the stands, and activities to attract people's attention.

People attending the events were encouraged to complete the survey, but discussions also provided useful insights into opinions on council services. Key findings are summarised below. People were encouraged to take flyers home, both as a reminder to fill out the survey themselves and to share with family, friends and neighbours, as we emphasised the desire to reach as many residents as possible.

Stroud Show

Saturday, 12 July – Stroud district

~ 15 Surveys ~ 40 conversations ~ 70 leaflets handed out

The audience was largely local to Stroud, and local councillors and district leadership were also in attendance. Many people felt that the local voice would be lost under LGR reforms, and they weren't supportive of change. However, many acknowledged that the different levels of local government now were confusing.

Quite a few specifically mentioned that they liked their Parish Councils. Residents complained about the lack of buses and public transport. A few discussed personal council issues.

Gloucester Quays Shopping Centre Pop-up

Saturday, 12 July – Gloucester City district

~ 8 Surveys ~ 50 conversations ~ 30 leaflets handed out

Feedback varied from disinterested to well-informed. Some attendees reported themselves as being from Gloucester, and identifying as such, but actually living within Stroud or Tewkesbury council areas.

There was some concern that unitary councils would not recognise the individual places that have their own unique identity under current arrangements. There was also a concern that any authority which contained Gloucester would have their resources diverted to the city. More broadly, there was a limited understanding of the difference between the levels of government and some disinterest in how services are delivered.

Coleford Music Festival

Sunday, 13 July – Forest of Dean district

~ 4 Surveys ~ 25 conversations ~ 15 leaflets handed out

Conversations tended to focus on very local issues including the role of Town and Parish Councils, noting that the Coleford Town precept had gone up dramatically in recent years. All residents spoken to wanted to maintain the identity of the Forest of Dean as a unique place and were not supportive of any option to become a unitary council.

Some councillors had been to the parish event on the 12th and were keen to understand more about what other authorities were doing elsewhere in the country. There was some feedback that the northern part of the Forest of Dean faces toward Herefordshire and could benefit from becoming part of that authority.

Moreton-in-Marsh Market

Tuesday, 15 July – Cotswold district

~ 21 Surveys ~ 25 conversations ~ 36 leaflets handed out

The busy market had a large tourist presence, making it harder to reach local residents. To counter this, the team engaged stallholders and shop staff directly. This approach ensured meaningful conversations with those living and working in the area.

Generally, there was a lack of trust of Cotswold District Council, partly due to the market stall holders themselves not having a positive experience when dealing with council officers. Aside from this, one of the biggest issues facing local people seemed to be with buses as some routes are being reduced or stopped altogether.

Regarding LGR, most were not aware this was happening but once explained, understood the reasons for the changes. Most were pleased with the idea it could lead to more effective and efficient councils.

Lydney Community Day

Saturday 19 July – Forest of Dean district

~ 2 Surveys ~ 45 conversations ~ 30 leaflets handed out

Feedback reflected concerns that the Forest of Dean is already overlooked for investment and that Lydney, on the edge of the district, is even more marginalised. Local transport limitations and dependence on cars were raised.

The 'Greater Gloucester City' model was criticised as exclusionary. Residents feared that roads and services would be deprioritised in favour of higher-traffic areas. A young carer noted potential benefits if services became more joined-up.

Councillors expressed opposition to reorganisation, with some arguing the county/district system should remain. Other comments touched on roadworks coordination, declining community events, and the importance of youth engagement.

Churchdown Summer Fun Day

Saturday, 19 July – Tewkesbury district

~ 1 Survey ~ 25 conversations ~ 15 leaflets handed out

Residents voiced concerns about historic boundary and naming issues, stressing Churchdown's distinct identity from Gloucester and Tewkesbury. Some frustration was expressed that the process was not consulting on whether reorganisation should happen at all.

The general sentiment was that change felt imposed and unnecessary, though residents still engaged with engagement materials. Issues raised included access to waste facilities and representation.

Cirencester Town Centre Pop-up

Sunday, 20 July – Cotswold district

~ 5 Surveys ~ 20 conversations ~ 15 leaflets handed out

Engagement included younger shop workers and local business owners. Leaflets were displayed in shops and community spaces.

Residents asked about potential combined authorities and whether reorganisation was required by national government. Concerns were raised about losing local identity, confusion over service responsibilities, and how planning could adapt to different topographical needs.

Tewkesbury Market

Wednesday, 23 July - Tewkesbury district

~ 35 Surveys ~ 40 conversations ~ 10 leaflets handed out

Residents valued Tewkesbury's historic identity and stressed the importance of a localised response to flooding. While many saw opportunities for improved efficiency under reorganisation, concerns were voiced about differences between districts such as the Cotswolds and Gloucester and what this would mean if the local authority areas were combined.

Gloucester City Centre Pop-up

Friday, 25 July – Gloucester City district

~ 30 Surveys ~ 50+ conversations ~ 10 leaflets handed out

This high-footfall location enabled engagement with a broad mix of residents. Safety, cleanliness, and homelessness in the city centre were key concerns, particularly from younger respondents.

Issues raised included a shortage of affordable housing, the use of hotels for temporary accommodation, and the pressures of migration on housing. Calls for more youth facilities, investment in health services, and stronger support for tourism were common themes.

Greenways Fun Day

Saturday, 26 July – Stroud district

~ 10 Surveys ~ 40+ conversations ~ 6 leaflets handed out

Residents voiced concerns about east–west divisions in the county creating inequalities. They called for prioritisation of affordable homes for young people and better responses to anti-social behaviour.

As a busy, family-friendly event, it was harder to focus people on doing the survey then and there but there was a lot of interest and people took photos of the materials and/or scanned the QR code to follow up later.

Cheltenham Town Centre Pop-up

Saturday, 2 August – Cheltenham district

~ 36 Surveys ~ 40+ conversations ~ 33 leaflets handed out

Engagement was steady throughout the day, with neutral or positive views towards reorganisation in the majority. Issues raised included concerns over council tax, immigration, potholes, and buses.

Awareness of local councillors was generally low, and most had not contacted council departments in recent years. Some raised issues with local SEN support.

No Child Left Behind Festival

Wednesday, 6 August - Cheltenham district

~ 37 Surveys ~ 30+ conversations ~ 22 leaflets handed out

The family-focused event drew strong engagement. Activities at the stand encouraged conversations with parents and carers.

Recurring issues included poor road and street maintenance, lack of awareness of councillors, and concern that a county-wide unitary would erase local identity. Some welcomed the idea of area forums to retain local voices.

Webinars

Two webinars took place, on 5 and 6 August, one held during the working day and the other during the evening, allowing for different people's schedules. Both events were advertised across social media channels by all the councils. A recording of the presentation was then hosted on the www.futuregloucestershire.co.uk website for those who could not attend.

The main sentiment from the Q&A portion of the webinar was requests for more details on exactly how the process will work, from questions about which council buildings will be kept to details on how departments will be organised and who will be responsible for policies.

The structure of local government beyond district and county level was raised, with several queries about how the potential combined authorities and mayoral areas will be organised, and on the other side, how this will affect Town and Parish Councils. It became clear that attendees had heard rumours about how both could work, including the concern that parishes will be given further responsibilities without more resources.

We learned that residents will need reassurance throughout the process. People were concerned about things like how council housing will work, whether libraries will be affected, whether staff are at risk of losing their jobs, and where council offices will be.

Also, a couple of comments concerned future updates, while attendees were happy to hear that the details were still not finalised, they were keen to hear the results of the survey and details as they emerge – so Gloucestershire councils must keep up the good momentum of engagement and information sharing.

We had 71 attendees across the two days (45 on Tuesday, 5 August and 26 on Wednesday, 6 August). The audience was a mixture of residents, council staff and councillors from all tiers of council.

Unlike some in-person conversations and the survey results, webinar attendees did not request that the status quo remain. This shows that if it is clearly explained then people do understand that LGR is a national government requirement, and change will be taking place. Attendees commented that they found it helpful and were grateful for the engagement.

Survey results

Demographics

The survey gathered demographic data from respondents so we could assess how representative the respondents were of Gloucestershire's population. Where possible, this has been reviewed against the 2021 Census data.

The key demographic findings are as follows:

Age: The majority of respondents were aged 55 and over (57%), followed by those aged 35-54 (30%), and under 35 (9%). Gloucestershire does have an older population than the national average, however given that the figures for 65+ at a county level are 22%, the survey responses skew to an older demographic than is fully representative.

Sex and Gender Identity: The respondents were almost evenly split between female (53%) and male (47%), with a slightly higher number of women than men responding, slightly higher than the census data which has 51% female. Almost all respondents indicated that their gender identity is the same as their sex at birth.

Sexual Orientation: About 80% of respondents identified as heterosexual/straight, which is less than the census data which 90% identified as such. Smaller proportions identified as asexual (~3%), bisexual (~3%), gay man (~2%), or lesbian/gay woman (~1%). The number of respondents identifying as LGBTQ+ was higher among under-35s (16%) compared to those aged 55 and over (less than 4%).

Ethnicity: The largest ethnic group was White British (87%), followed by White European (4%) and White Irish (1%). Other individual ethnic groups each accounted for less than 1%. This is reflective of the demographics of the county (based on the 2021, 88% of the population is White British with a further 5% coming from other White backgrounds).

Religion or Belief: The most common responses were 'No religion' (46%) and 'Christian' (44%). 'No religion' was more prevalent among under-35s, while 'Christian' was more common among older age groups, reaching around 62% in those aged 75 and over. The county levels for 'Christian' are higher at 48%, and lower for 'No religion' at 43%.

Long-term Illness or Disability: About 19% of respondents reported having a long-term illness or disability that limits their day-to-day activities, less than the census figure of 23%.

Caring Responsibilities: Approximately 20% of respondents had caring responsibilities, mainly for older family members (15%). A smaller proportion (4%) cared for children with additional needs, and around 1% had dual caring responsibilities. This is higher than the census' average of 9% providing unpaid care.

Survey responses in detail

Section 1: A sense of belonging

This section of the survey focused on where people lived and where they identified as 'home' within the county. Respondents were asked for their postcode (first half only), which councils they

thought represented them, and where they consider they live. The latter was to determine whether people's local identity is more closely tied to the county, district, or local neighbourhood.

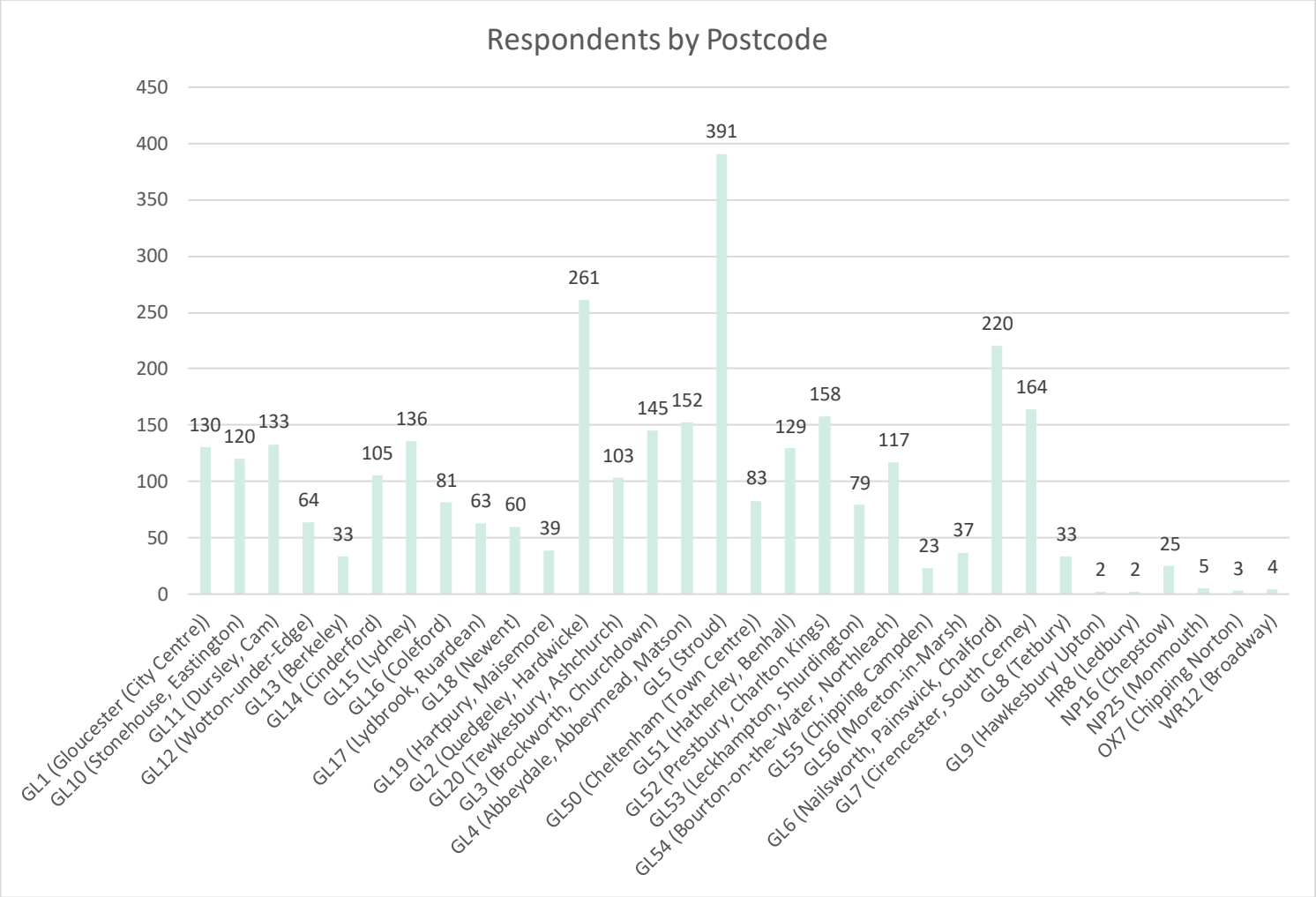


Figure 1

Figure 1 shows the distribution of respondents across postcodes and the most commonly associated areas within the postcodes. There is notably high turnout from GL5 (Stroud), GL6 (Nailsworth, Painswick, Chalford), GL7 (Cirencester, South Cerney), GL52 (Prestbury, Charlton Kings), GL4 (Abbeydale, Abbeymead, Matson) and GL3 (Brockworth, Churchdown).

Eleven respondents gave a hometown postcode outside of Gloucestershire, explained by the fact some lived on the borders or visited the county for work. Those postcodes were: GL9, BS37, IP2, GL20, GL8, GL12, OX7 and TA1.

People were asked to select their council, with the option of all six districts, the county council, and 'other.' 52 (2%) were not sure which council they were served by, indicated by either selecting 'not sure' or by selecting multiple district councils. However, we were able to allocate all except seven using the postcode and description of where they live for the purpose of effective survey analysis.

1,012 (33%) included Gloucestershire County Council as part of their answer, with 15 of those placing it as their only council. This shows that 2,090 (67%) respondents either do not realise this is their council or do not see it as much a part of their day-to-day life as their district council.

As shown in Figure 2, the districts were relatively evenly represented in responses, except for Stroud District Council which saw a considerably higher response rate.

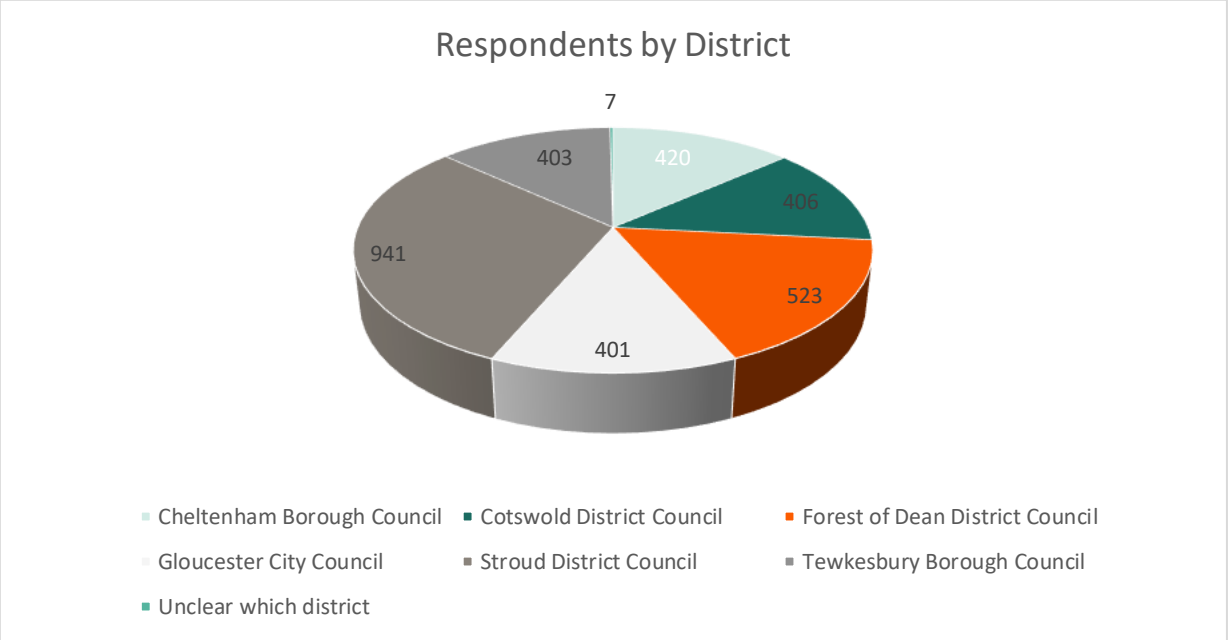


Figure 2

34 people added a council after selecting 'other'. Of these, 23 were Parish Councils and 11 were councils outside of Gloucestershire County Council lines (e.g. South Gloucestershire, Wychavon, West Oxfordshire, Malvern Hills, Somerset and Ipswich).

Next, people were asked to tell us first where they lived (Figure 3) and then what they considered to be their 'local area' (Figure 4). The word-clouds below summarise the most common responses to each.



Figure 3

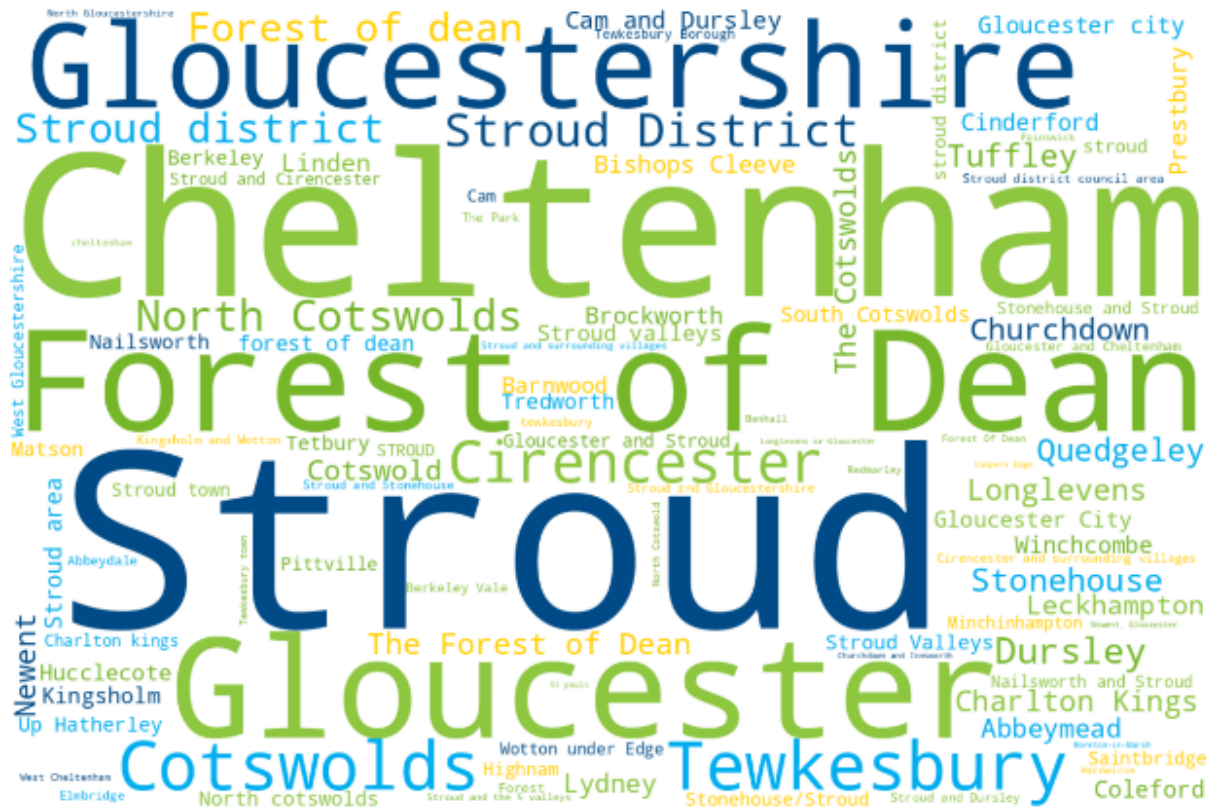


Figure 4

These two questions were designed to get people thinking about where they feel most connected to, rather than thinking solely in terms of council boundaries. The results show that people are

more specific when thinking about where they live vs what is their local area, and that while the district names are mentioned frequently, hundreds of smaller towns and villages are included, suggesting people's sense of home is more complex than which district or county they belong to.

We then asked people to what extent they felt a 'sense of belonging' to the local area they just identified. The responses to this question were overwhelmingly positive, with 1,503 (48%) saying strongly agree, and only 218 (7%) either disagreeing or strongly disagreeing (shown in Figure 5).

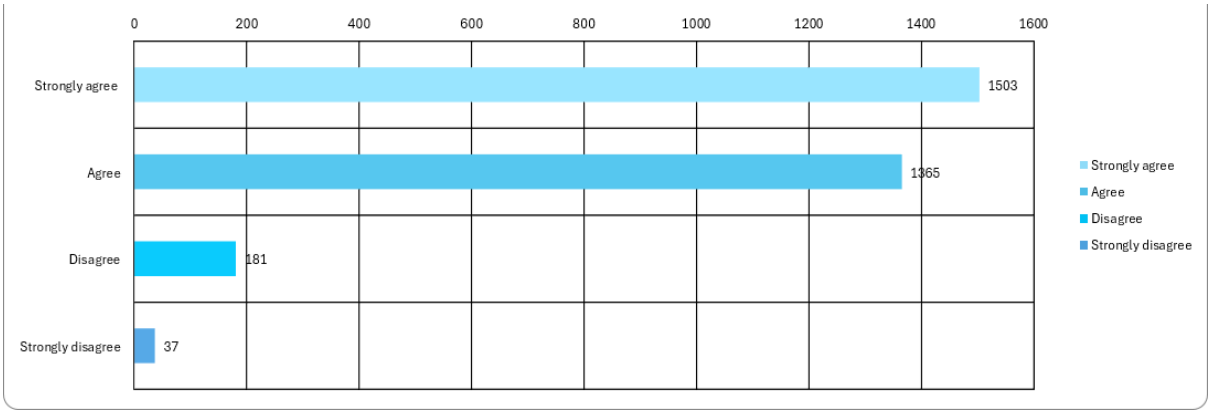


Figure 5

We then asked respondents to rank the importance of various key factors in contributing to this 'sense of belonging'.

Overall, green open spaces were rated as the most important element, with 72% saying they were 'very important'. Safety was the next priority, with 70% rating it very important, followed by 65% saying 'easy to get to important things like buses, schools and the GP' were very important.

Only 40% said history and heritage was very important to them, however overall, all elements were seen as more important than not important. 9% said events were not at all important, and this was the highest percentage of all 'not at all important' rankings.

Section 2: Council Services

In this next section of the survey, respondents were asked for feedback on their council services as they are now, including assessments of a series of council services and feedback on their engagement with councillors and officers.

Overall, 2,215 (71%) know who their councillors are, and 1,045 (34%) have contacted them in the last two years. 77% were satisfied or very satisfied with the response from their councillor.

1,904 (61%) have contacted a council department, and 73% were happy or very happy with the response from the relevant department.

In terms of services provided, rubbish and recycling and parks and green spaces consistently receive a high positive sentiment across all councils, while roads and pavements are the weakest area – in almost every council, these saw the lowest 'very good' ratings and highest negative feedback.

Residents across all councils received good ratings on average, with little differentiation between the six districts.

Overall average satisfaction per district (rated 1–4 scale):

Cheltenham Borough Council: 2.89
Cotswold District Council: 2.70
Forest of Dean District Council: 2.72
Gloucester City Council: 2.81
Tewkesbury Borough Council: 2.87
Stroud District Council: 2.86

Each council's individual feedback figures are summarised below:

Cheltenham Borough Council

420 responses were from residents in Cheltenham Borough Council. Table 1 shows how respondents from Cheltenham ranked the council services. Key things to note are that parks, gardens, and other green spaces were the highest rated, with 93% 'very good' or 'good', and roads, pavements, and streetlights were rated the lowest, with only 2% rating them as 'very good' and 76% as 'not good' or 'not very good at all'.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	32%	55%	9%	4%
Roads, pavements and streetlights	2%	21%	48%	28%
Parks, gardens, and other green spaces	40%	53%	6%	1%
Schools and education	23%	69%	6%	2%
Libraries	22%	60%	15%	4%
Sports facilities/festivals/events	32%	57%	9%	2%
Local buses	14%	59%	23%	4%
Social care and benefits	5%	56%	29%	10%

Table 1

Engagement with Councillors
The survey included two questions about residents' awareness and interactions with their district or county councillors.

Awareness
A significant portion of residents (75%) are aware of their councillors, with 35% having actively engaged with them in the last two years. 15% did not know who their councillors were and 10% were unsure or did not respond.

Satisfaction
Among those who had contacted their councillors, 27% were very satisfied with the response, 40% were satisfied, 22% were dissatisfied, 10% were very dissatisfied and 1% did not respond.

The satisfaction levels are relatively positive, with 67% expressing satisfaction (either very satisfied or satisfied). However, the dissatisfaction rate of 32% (dissatisfied or very dissatisfied) indicates that there is still a notable portion of the population that feels their concerns are not being adequately addressed.

Engagement with Council Officers
The survey also included questions about residents' interactions with council departments over the past two years.

Contact
65% of respondents had contacted a council department within the last two years, some respondents mentioned contacting a different borough, possibly related to friends or family across the border or where they work.

Satisfaction
Of those who had contacted a council department, 19% of respondents were very happy with their experience, 47% were happy, 21% were not happy, 12% were not at all happy and 1% did not respond.

Cotswold District Council

406 responses were from residents in Cotswold District Council. The rating of the services is detailed in Table 2 below. There were several well rated services in this district, with 90% rating Schools and education as 'good or very good', 89% rating rubbish and recycling as the same and 87% for parks, gardens, and other green spaces.

Roads, pavements and streetlights were less well rated, with 56% rating 'not good' or 'not very good at all', and 42% saying the same for social care and benefits.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	35%	54%	8%	3%
Roads, pavements and streetlights	3%	22%	44%	32%
Parks, gardens, and other green spaces	17%	70%	11%	2%
Schools and education	21%	68%	9%	2%
Libraries	18%	60%	16%	6%
Sports facilities/festivals/events	15%	58%	22%	5%
Local buses	4%	25%	41%	29%
Social care and benefits	7%	51%	32%	10%

Table 2

Engagement with Councillors

Awareness
42% of respondents knew who their councillors were and had contacted at least one of them within the last two years. 37% knew who their councillors were but had not contacted them, while 13% did not know who their councillors were.

Satisfaction
Among those who had contacted their councillors, 39% were very satisfied with the response, and 40% were satisfied. However, 15% were dissatisfied, and 6% were very dissatisfied.

Contact with Council Departments

Engagement
65% of respondents had contacted a council department within the last two years.

Satisfaction
18% of respondents were very happy with their experience, and 46% were happy. However, 26% were not happy, and 9% were not at all happy.

Forest of Dean District Council

523 responses were from residents in Forest of Dean District Council. Table 3 shows the range of ratings given to the services by the residents.

Rubbish and recycling were rated very highly, with 95% of respondents rating it as 'good or very good'. Roads, pavements, and streetlights, and local buses were seen as poor, with 67% and 64% rating them 'not good' and 'not very good at all' respectively.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	51%	44%	4%	1%
Roads, pavements and streetlights	3%	30%	43%	25%
Parks, gardens, and other green spaces	26%	60%	11%	3%
Schools and education	12%	69%	15%	4%
Libraries	16%	62%	16%	5%
Sports facilities/festivals/events	10%	56%	27%	6%
Local buses	5%	31%	40%	24%
Social care and benefits	4%	49%	35%	12%

Table 3

Engagement with Councillors

Awareness
34% of respondents knew who their councillors were and had contacted at least one of them within the last two years. 33% knew who their councillors were but had not contacted them, while 23% did not know who their councillors were.

Satisfaction
Among those who had contacted their councillors, 39% were very satisfied with the response, and 44% were satisfied. However, 10% were dissatisfied, and 7% were very dissatisfied.

Contact with Council Departments

Engagement
59% of respondents had contacted a council department within the last two years.

Satisfaction
26% of respondents were very happy with their experience, and 52% were happy. However, 13% were not happy, and 8% were not at all happy.

Gloucester City Council

401 responses were from residents in Gloucester City Council. Table 4 details the ratings given by people in this district. The data reveals that while some services, such as rubbish and recycling, are well-regarded (92% saying very good or good), but other areas are seen as sub-par, with 56%

reporting roads, pavements and streetlights as 'not good' or 'not very good at all' and 42% saying the same for social care and benefits.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	34%	58%	5%	3%
Roads, pavements and streetlights	3%	41%	41%	15%
Parks, gardens, and other green spaces	11%	68%	18%	3%
Schools and education	13%	69%	15%	3%
Libraries	18%	66%	13%	3%
Sports facilities/festivals/events	9%	57%	28%	5%
Local buses	17%	55%	23%	5%
Social care and benefits	5%	53%	35%	7%

Table 4

Engagement with Councillors

Awareness
30% of respondents knew who their councillors were and had contacted at least one of them within the last two years. 38% knew who their councillors were but had not contacted them, while 23% did not know who their councillors were.

Satisfaction
Among those who had contacted their councillors, 25% were very satisfied with the response, and 47% were satisfied. However, 17% were dissatisfied, and 12% were very dissatisfied.

Contact with Council Departments

Engagement
61% of respondents had contacted a council department within the last two years.

Satisfaction
16% of respondents were very happy with their experience, and 46% were happy. However, 18% were not happy, and 10% were not at all happy.

Stroud District Council

The district with the most responses was Stroud with 941, and the service ratings are below in Table 5. Responses were very positive overall, especially relating to rubbish and recycling which received 97% 'good or very good' ratings. Parks, gardens, and other green spaces, schools and education. Libraries all also had positive ratings above 85%.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	60%	37%	2%	1%
Roads, pavements and streetlights	3%	28%	48%	21%
Parks, gardens, and other green spaces	30%	63%	7%	1%
Schools and education	20%	68%	9%	3%
Libraries	26%	59%	12%	3%
Sports facilities/festivals/events	19%	67%	12%	2%
Local buses	5%	33%	40%	22%
Social care and benefits	5%	54%	33%	9%

Table 5

Engagement with Councillors

Awareness
33% of respondents knew who their councillors were and had contacted at least one of them within the last two years. 38% knew who their councillors were but had not contacted them, while 19% did not know who their councillors were.

Satisfaction
Among those who had contacted their councillors, 51% were very satisfied with the response, and 36% were satisfied. However, 8% were dissatisfied, and 5% were very dissatisfied.

Contact with Council Departments

Engagement
63% of respondents had contacted a council department within the last two years.

Satisfaction
33% of respondents were very happy with their experience, and 44% were happy. However, 16% were not happy, and 7% were not at all happy.

Tewkesbury Borough Council

403 responses were from residents in Tewkesbury Borough Council. The survey results indicate that Tewkesbury residents were most positive about rubbish and recycling services (96% very good or good), with schools and education second (84%) and most negative about roads, pavements and streetlights, with 66% rating them not good or not very good at all.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	63%	33%	4%	0%
Roads, pavements and streetlights	4%	30%	43%	22%
Parks, gardens, and other green spaces	17%	62%	18%	3%
Schools and education	16%	68%	14%	2%
Libraries	24%	57%	15%	3%
Sports facilities/festivals/events	16%	60%	20%	4%

Local buses	18%	47%	24%	11%
Social care and benefits	7%	52%	34%	7%

Table 6

Engagement with Councillors

Awareness
30% of respondents knew who their councillors were and had contacted at least one of them within the last two years. 40% knew who their councillors were but had not contacted them, while 20% did not know who their councillors were.

Satisfaction
Among those who had contacted their councillors, 36% were very satisfied with the response, and 36% were satisfied. However, 19% were dissatisfied, and 7% were very dissatisfied.

Contact with Council Departments

Engagement
56% of respondents had contacted a council department within the last two years.

Satisfaction
25% of respondents were very happy with their experience, and 46% were happy. However, 20% were not happy, and 9% were not at all happy.

Other Services

An additional option after rating the eight specified services was 'I'd like to rate a different service'. Across all respondents, 261 respondents chose to respond to this question, just over 8% of the total respondents. This has been analysed across the county rather than by district, as the relatively low response rate to this question would imply

Issues around planning and highways dominate the comments - these two areas alone account for more than half of all service mentions. By noting that people felt the need to add extra analysis to topics such as roads and schools that had already been rated in the previous questions shows the strength of people's opinions.

For each, we have included a sentiment score[61] and some examples of the kind of comments included.

a) Planning / Development / Building Control - 16.5% of comments

[61] *Each comment in the survey was tagged with a sentiment label: **Positive**, **Neutral**, or **Negative**. To quantify overall sentiment for each issue, these labels were converted into numerical scores as follows:*

- ***Positive** → **+1***
- ***Neutral** → **0***
- ***Negative** → **–1***

*For each category, the **average sentiment score** was calculated by taking the mean of all individual comment scores associated with that issue. This provides a simple, interpretable metric:*

- *A score **closer to +1** indicates generally positive feedback.*
- *A score **around 0** suggests mixed or neutral sentiment.*
- *A score **closer to –1** reflects predominantly negative feedback.*

This approach allows for easy comparison across service areas and helps highlight where public perception is most favourable or critical.

Average Sentiment Score: -0.27

There were concerns raised about new development, density, lack of local consultation and poor enforcement of planning decisions. There were also complaints raised about the performance of planning services.

- *"Planning decisions - this should be more under the umbrella of the town council not the district most of which do not live in the area".*
- *"Planning applications are dealt with extremely slowly... little consistency between councils."*

b) Roads / Highways / Potholes - 10.0% of comments
Average Sentiment Score: -0.30

There were recurrent complaints about potholes, poor road maintenance, resurfacing delays and local road safety. There were also localised complaints about the streetscape, covering issues like parking availability and enforcement, and litter and graffiti.

- *"Highways- not very good at all. Far too many road closures, and temporary traffic lights."*
- *"Fix my pothole website... a pothole in my street was fixed within the week!"*

c) Housing / Homelessness / Council houses - 5.5% of comments
Average Sentiment Score: 0.09

A number of comments were frustrated that housing services have not improved in the area.

- *"Lack of social housing for people."*
- *"Housing officers aren't good as they have too much work to do".*

d) Schools / Education - 4.0% of comments
Average Sentiment Score: 0.00

A small number of people raised issues around education, from a lack of nurseries through to problems with the education system overall. There were a number of comments about poor transport to school.

- *"Early careers - needs to be better in schools"*
- *"I think we should not have an 11 plus grammar school system. It is divisive. I went to a comprehensive school in Oxford."*

e) Children's services / Child protection - 3.5% of comments
Average Sentiment Score: -0.43

Similar to schools / education, a small number of people raised real concerns with children's services, mostly from parents trying to access SEND support for their children.

- *"Children's services - not good at all"*
- *"Parents trying to negotiate SEND provisions for children with extra needs is a lengthy and high stress process. This needs huge investment as these children will slip through the*

cracks."

f) Waste / Bin collections / Recycling - 3.5% of comments
Average Sentiment Score: -0.14

Missed collections and recycling issues appear across a number of comments. There was a surprisingly strong opposition to the way recycling centres operate with multiple people raising frustration with having to register in advance to attend and feeling that these centres make it harder for them to recycle.

- *"Any suggestion of bin collection every 3 weeks should be stopped".*
- *"Recycling Centres: Not very good at all due to having to book for a slot".*
- *"Recycling Household Centre. The registration of cars should be removed".*

g) Public transport / Buses - 3.0% of comments
Average Sentiment Score: -0.50

There were a range of complaints about bus reliability, frequency and connections — and a recognition that these impact people's ability to travel without a car. Many of these were very specific complaints about a local service.

a) *"The Number 10 bus service: Inconsistent every single day, rarely happens according to the schedules at the bus stops. Many busy stops rely on printed schedules as they do not have electronic schedules. The Stagecoach West app sometimes lies about where buses are. And the overall cost is terrible. The monthly Rider Plus ticket now costs £85 per 28 days (i.e. £1,020+ per year). This is reaching a point where private transport is becoming economically comparable and vastly more comfortable and convenient over public transport. This is exactly the reverse of where public transport as a service in Gloucestershire should be heading."*

h) Council tax / Benefits / Finance - 2.5% of comments
Average Sentiment Score: -0.20

b) *"Cost of council tax value for as council tax is incredibly expensive for the services received/provided."*

c) *"Council tax can vary greatly in cost between councils & also which parish you live in."*

Section 3: Local government reorganisation

In this section of the survey, we focused on questions about LGR and the future of councils in Gloucestershire.

What are your top priorities when it comes to reorganising councils in Gloucestershire?

We first asked respondents to rank in order of priority the four key objectives of LGR, as set out by National Government:

'Make sure your council tax is well spent' was the top priority for most people, with 1,267 rating this highest. Next highest was 'make local services better', named as the top priority by 1,128 respondents.

There is then a large gap with only 330 naming 'provide a sense of community' as their highest priority and a similar figure of 337 saying 'provide a stronger voice for residents'.

We can see from this that overwhelmingly people's priority is the practical day-to-day spending and work of the council, rather than feeling the council should focus on issues of identity and feeling included.

Is there anything else you think should be a priority, or anything you would like us to think about when putting together plans to reorganise Gloucestershire's local government structure?

The final question in the survey asked if there was anything else respondents wanted us to consider when designing proposals for how new council services will be delivered under LGR. Almost 60% of respondents answered this question and their comments are summarised below, divided into overall comments and specific references to different structures.

Topics to consider

Almost 60% of respondents answered this question and their comments are summarised below, grouped into key categories:

Theme	Percentage (%)	Explanation
Community	16.06	Concerns about local representation, community identity, and engagement in decision-making.
Transport	9.36	Issues related to public transport, road maintenance, and connectivity.
Housing	5.47	Comments on housing affordability, development planning, and infrastructure.
Environment	3.51	Feedback on climate action, sustainability, and environmental conservation.
Economy	2.8	Suggestions for economic growth, job creation, and business support.
Healthcare	2.19	Concerns about access to medical services and hospital facilities.
Education	2.06	Issues regarding schools, learning opportunities, and educational infrastructure.
Safety	1.64	Mentions of crime prevention, policing, and community safety.

Table 7

Of the above, the most common concerns were:

- Community engagement and local representation – Emphasis on keeping decisions local and maintaining identity.

1. *"Local government is not just about providing services, it is also about being a place leader and convenor for the local system and communities. I am concerned that discussions about LGR are so reductive - just focusing on what the boundary should be. If I had a preference it would be for two authorities to retain local identity and prioritisation of areas that may be overlooked on a larger footprint with joint working to achieve economies of scale in service delivery."*

2. *"Support for community hubs which provide a point of contact for services and places for people to come together."*

3. *"The decision should be based on what's best for residents, NOT local politicians."*

- Transport infrastructure – Calls for better public transport, road maintenance, and connectivity.
- *"Integrated public transport network."*
- *"Churchdown is part of Tewkesbury. I can't get to Tewkesbury on a bus from Churchdown."*
- *"Improve transport across the county as a one Gloucestershire scheme, not just good in the urban areas of Gloucester and Cheltenham."*
- Housing development – Concerns about affordability, planning, and infrastructure support.
- *"I recognise the need for more housing… but it's SO important that the roads and parks/green spaces around these new estates is managed well."*
- *"Local housing only for local people and ex-military."*
- *"Housing needs to be prioritised. Limited and get infrastructure right before new homes."*
- Environmental protection – Requests for climate action, conservation, and sustainability.
- *"Protecting our green spaces, fields, woods, and farmland from development."*
- *"Climate and nature action for the transition to a low carbon economy."*
- *"Environmental concerns, green energy and net zero."*

Other Issues

Several other issues were raised, although in much smaller numbers. These included:

- Youth Services
- Public Health / GP services
- Cycling infrastructure
- Libraries and museums
- Environmental services
- Parking / Car Parking
- Services Older People
- PROW (Public Rights of Way)
- Policing

Council Structure

While at no point were respondents asked to give their view on the proposed structure options of the future unitary council, 225 (7% of the respondents) actively gave preferences in the written text on which unitary council formation they would prefer out of the three currently proposed options. Of these, 205 (91%) preferred one single unitary council governing the whole county, 14 (6%) preferred the East / West split, and 3 (1%) preferred the Greater Gloucester City model. Three (1%) people said they preferred a two-council split but did not specify the split.

There were concerns that the East / West split would essentially be seen as a rich / poor divide. Few were in favour of the East / West approach, with even fewer in favour of the 'Greater Gloucester' approach. There were some disparaging remarks about the latter not "making sense" and references to this model being a "political" manoeuvre.

- *"It would be extremely unfair to split our county into two councils, especially along the lines proposed - which would effectively mean a "rich" side and a "poor" side of the county, as this would likely cause greater feelings of division between people."*

- *"The Greater Gloucestershire option is also very silly. It's just a political idea that will make us poorer."*

Some people saw the two-council option as a half-measure, continuing to cause confusion over who is responsible for what, and causing disruption to existing services while not achieving the efficiency LGR claims to provide.

- *"Providing a 'one stop' shop for council services across the County, to eliminate confusion as to who does what. Also not to break up services that operate perfectly well at the moment to further a 'two unitary' arrangement."*

- *"To have two unitary authorities would be divisive, inefficient (compared to one), and cause identity confusion (with the additional factor of South Gloucestershire already existing)."*

Many said one large council was the most efficient option, noting concerns about splitting Gloucestershire County Council regarding health, fire, police services. Economies of scale were mentioned.

There was a feeling from Forest of Dean residents that they would be neglected in a larger council.

There were those who mentioned options outside those currently proposed. Many wanted the system to stay as it is, however, many who mentioned this realised this was not an option. Some offered alternative solutions such as areas joining Wiltshire or Herefordshire or South Gloucestershire Councils.

Conclusions

Headline conclusions

Existing councils are generally well-thought of, with high ratings for both services and interactions with councillors and officers. While this reflects well on local services, it does mean that residents may be concerned about any potential change to the way their councils operate. Several comments, in person and online, reflected a contentment with the current system and a preference for no change at all.

Reviewing any negative ratings and written feedback should guide improvements in the new system, especially by addressing limitations in the current two-tier system to improve services that are less

successful now. This could include emphasising that housing and infrastructure would now be more joined-up which was requested, or it could be shown that the change gives a chance to improve the environmental credentials of the councils.

Despite many concerns about local identity and community being lost, when respondents were asked to clearly rank their priorities for the future, efficient use of council tax and good service provision were far above sense of community and a local voice.

The whole Gloucestershire model was given as the preference by the majority of those who offered an opinion on future structures.

Resistance to change

There is a need to explain to people that LGR is a national policy with wider objectives – and that no change is therefore not an option.

Our engagement activities have included informing residents about the purpose and requirements of LGR, so this process has already begun. Based on discussions and shared information, it appears that more residents now understand the national government's requirements. Although some express a preference for maintaining the current system, there is recognition that change will occur.

Many people were also aware of the wider plans for devolution, ranging from conversations about combined authority mayors to potential increased roles for parish and town councils. Future information will need to include references to what will happen here as soon as possible, to avoid the current information spreading which could be misleading.

Next steps: Clear communications

It is important to build on the engagement already carried out, to keep residents' trust and prevent any misinformation. The key learnings of the engagement show which concerns were raised and where reassurance will be needed in future communications.

People wanted to see financial efficiencies – but not a service reduction: Those who preferred a unitary system cited financial efficiencies and the main priority was effective council tax spending and day-to-day services. Presenting evidence that supports these outcomes would strengthen the case.

People are confused about which council they belong to and who is responsible for what, leading to frustration when passed between councils. Messaging should highlight that a simpler system would be easier to navigate and encourage more engagement.

Each area has a distinct identity, so it must be made clear that the change is aimed at improving administration and efficiency, rather than changing altering the local character. Neighbourhood initiatives can help maintain a sense of community and clear roles for parish and town councils.

Another primary consideration is maintaining a sense of belonging to Gloucestershire, balancing local representation with broader identity. It should be noted that local representation will remain in place, and it will become more straightforward to identify and contact representatives.

Concerns were raised that larger councils will mean decisions are made for areas by people further detached from the area in question. Measures will need to be put in place to ensure officers or councillors handle this carefully.

Residents currently happy with the council services provided will need reassurance as to how services will be managed during the period of transition – mentioning the shadow council period and being open about the fact it may take a while but will provide a better service long term.

There were concerns raised that there was no real chance to state preference for the system. Since this was a period of engagement, rather than a formal consultation, the materials clarified that an official consultation would follow. When recommendations go to the government, local messages should make it clear that people can and should provide feedback.

As detailed plans to guide the choice of options are formed by officers, these facts and figures should then be used to support communications to residents, to work together to bring forward the future of Gloucestershire.

Appendix 1: Survey questions

Section 1: A sense of belonging

What is the first part of your postcode (e.g. GL5)?

What is your local council (tick all that apply)?

- Cheltenham Borough Council
- Cotswold District Council
- Forest of Dean District Council
- Gloucestershire County Council
- Gloucester City Council
- Tewkesbury Borough Council
- Stroud District Council
- Not sure
- Other (please specify)

Where do you live?

What do you consider to be your local area?

Thinking about your answer to the last question, tell us how much you agree with the following statement: 'I feel a sense of belonging here'

- Strongly Agree
- Agree
- Disagree
- Strongly Disagree

How important are the following aspects in contributing to your sense of belonging to where you live?

Local places to go like shops, community centres, sports and fun places.

- Very important
- Important
- Slightly important
- Not at all important
- I don't have a view

Things happening nearby like festivals and events.

- Very important
- Important
- Slightly important
- Not at all important
- I don't have a view

People you know in your area like friends, family, and neighbours.

- Very important
- Important
- Slightly important
- Not at all important

I don't have a view

Green areas like parks, communal gardens, nature, and open spaces.

Very important
Important
Slightly important
Not at all important
I don't have a view

Easy to get to important things like buses, schools and the GP.

Very important
Important
Slightly important
Not at all important
I don't have a view

How safe you feel in your area.

Very important
Important
Slightly important
Not at all important
I don't have a view

History and heritage like important things from the past and local traditions

Very important
Important
Slightly important
Not at all important
I don't have a view

Section 2: Council services

For each of the following everyday council services, please rate how well you believe they are working in your area.

Rubbish and recycling collection

Very good
Good
Not good
Not very good at all

Roads, pavements and streetlights

Very good
Good
Not good
Not very good at all

Parks, gardens, and other green spaces

Very good
Good
Not good
Not very good at all

Schools and education

Very good
Good
Not good
Not very good at all

Libraries

Very good
Good
Not good
Not very good at all

Sports facilities/festivals/events

Very good
Good
Not good
Not very good at all

Local buses

Very good
Good
Not good
Not very good at all

Social care and benefits

Very good
Good
Not good
Not very good at all

I'd like to rate a different service:

Very good
Good
Not good
Not very good at all

Do you know who your DISTRICT or COUNTY councillors are, and have you contacted them within the last two years?

Yes, and I've contacted at least one of them
Yes, but I've not contacted them
I'm not sure
No, I don't know who they are

If you answered 'Yes, and I've contacted at least one of them', overall, how happy were you with how the dealt with your questions, concern or comment?

Very satisfied

Satisfied
Dissatisfied
Very dissatisfied

Have you contacted a council department (for example, parking, council tax, housing, etc) in the last two years?

Yes - several times a year
Yes - once or twice a year
No

Which council(s) did you contact?

Gloucestershire County Council
Cheltenham Borough Council
Cotswold District Council
Forest of Dean District Council
Gloucester City Council
Stroud District Council
Tewkesbury Borough Council

Think about the last time you contacted your council. Overall, how happy were you with the experience?

Very happy
Happy
Not happy
Not at all happy

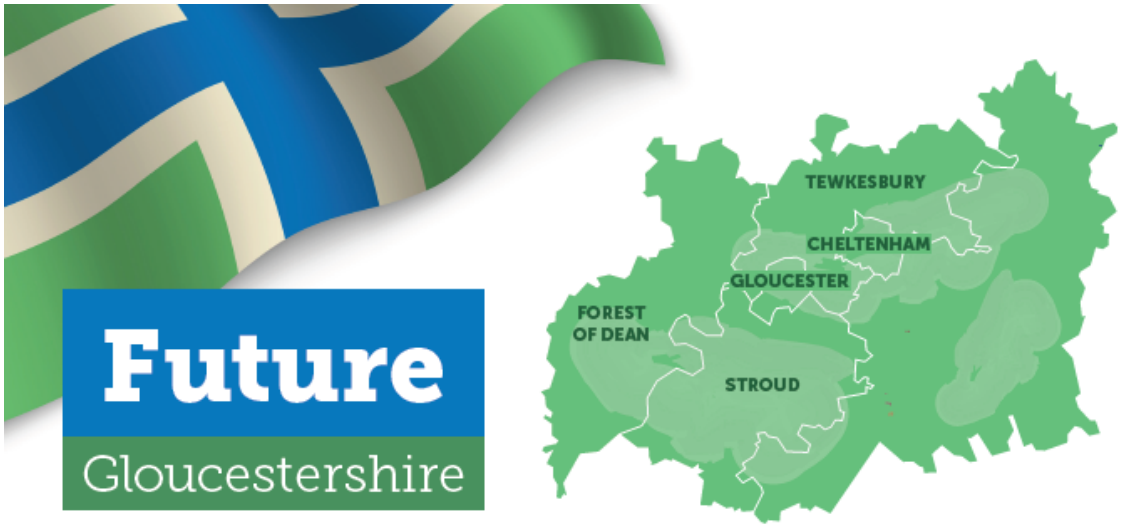
Section 3: Local government reorganisation – what matters to you?

What are your top priorities when it comes to reorganising councils in Gloucestershire? Please rate the following priorities from 1-4 (where 1 is the most important) based on how important they are to you:

Make local services better: This means improving things like rubbish collection, parks, and other services you use every day.
Make sure your council tax is well spent: Provide good local services without wasting your council tax.
Provide a stronger voice for residents – listening and responding to your concerns.
Provide a sense of community and belonging – respect the unique character of Gloucestershire, like its history and culture.

Is there anything else you think should be a priority, or anything you would like us to think about when putting together plans to reorganise Gloucestershire's local government structure?

Appendix 2: Flyers and banners



What is Local Government Reorganisation?

The national government wants to change how local councils work. You currently have one county council and six smaller district councils in Gloucestershire. The different types of councils are responsible for different services (explained overleaf).

The plan is to swap them for fewer, bigger councils that look after all services. These are known as 'unitary' authorities, and have existed across the UK in many places for several years - they can cover a whole county, part of a county or a large town or city.

The government produced an official document in 2024, showing their plans for devolution (handing power from national to local government) and saying that a unitary council system is the best way to achieve this.

What does it mean for Gloucestershire?

Rather than stating the plans for reorganisation, the government asked local councils to produce proposals on how they would like to move to a unitary model. In Gloucestershire, this could involve combining all six districts into one unitary council or dividing into two separate unitary councils.

The district councils and the county council are discussing what the best plan would be, both individually and as a group. The views of residents and communities are an important part of the decision-making process.

These changes give us a chance to check all the services we offer, to give people in Gloucestershire good, strong, and effective public services for years to come.

When will be know what is happening?

The deadline for all seven local councils to submit a joint final plan is the end of November 2025. If the seven cannot agree a shared plan, each council can submit one proposal, and the government would make the final decision.

The transfer of services would take place gradually over two years, and the unitary authority or authorities would be up and running fully by 2028.

www.futuregloucestershire.org.uk

Gloucestershire COUNTY COUNCIL

What do councils do?

County Council Services that Gloucestershire County Council is responsible for include:

- Helping children, including fostering and adoption
- Helping older people and adults who need support
- Making sure roads, paths, and cycle routes are safe and usable
- Buses, park & ride, and school travel
- Streetlights and traffic lights
- The fire and rescue service
- Making sure shops sell things fairly (Trading Standards)
- Registering important life events: births, deaths, marriages, and civil partnerships
- Working with businesses to create more jobs and help people learn new skills
- Free bus passes for older people and blue badges (parking for people with disabilities)
- Education
- Public Health - services that support people to become or remain healthy
- Libraries
- Large recycling centres and disposal of household waste collections

District Council

Cheltenham Borough Council · Cotswold District Council · Forest of Dean District Council · Gloucester City Council · Stroud District Council · Tewkesbury Borough Council

- Home rubbish and recycling collection, and street cleaning
- Collecting Council Tax
- Public spaces like footpaths, parks and trees on streets
- Planning and Building Control - Looking at plans for new buildings
- Culture, sport and leisure e.g. events and museums
- Providing homes and reducing homelessness
- Community safety teams, preventing and dealing with issues such as vandalism or noise complaints
- Community wellbeing - looking how to make people happier and healthier
- Managing benefits to help people pay their rent and council tax
- Licencing - permits for things like pubs, taxis, and events.
- Making sure places like restaurants are clean and safe
- Collecting taxes from businesses in the area (Business Rates)
- Public toilets

Town and Parish Councils

The most local voice you have is the town or parish council, although they do not have as many required roles to carry out as district, county or unitary councils. Each one could carry out different roles than their neighbour, and not all areas will have one. These will be unaffected by any plans for local government reorganisation. Responsibilities can include:

- Supporting local community groups
- Allotments
- Car parks
- Community centres
- Providing local grants
- Playgrounds
- Vandalism
- Neighbourhood plans
- Providing an official neighbourhood voice e.g. on planning applications

Future Gloucestershire

SCAN ME



Have your say!

Your district and county council want to hear from you:

How well do you feel council services in our area work?

Have you ever spoken to your local council or councillors?

What about your community is most important to you?

How can we make Gloucestershire run as smoothly as possible?

To fill out our survey, scan the QR code or visit www.futuregloucestershire.org.uk

Future Gloucestershire

SCAN ME



Local Government Reorganisation

Did you know there are national plans to re-structure the way local government works?

The system will change from a 'two-tier' to a 'unitary' authority – come and ask us what this means!

Help your local councils shape the future of Gloucestershire.

To fill out our survey, scan the QR code or visit
www.futuregloucestershire.org.uk

Gloucestershire COUNTY COUNCIL

Appendix 4: Summary Report of Feedback from Partner Organisations (Engagement conducted June - August 2025)

Background

Ministerial guidance for LGR has provided clarity about the role and purpose of Gloucestershire County Council (GCC) stakeholder engagement in the proposal development process. Criteria 4c of the Ministerial criteria makes clear that:

'Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed'

In addition, GCC has been mindful of its role in providing most of the 'crucial services' referenced in criteria 3c:

'Consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety'

Guidance has also been provided to ensure wider public sector providers are engaged as proposals are developed. The relevant guidance is contained within the Letter to Leaders from the (former) Local Government Minister.

In this context, it was necessary for a stakeholder engagement exercise to be undertaken, at pace, to ensure GCC's county-wide stakeholders were positively engaged. All engagement was conducted in the context of GCC Cabinet policy to be agnostic of structural options.

The feedback from stakeholder groups has been considered alongside the outcomes of other forms of engagement and is addressed clearly in the substantive engagement chapter of this proposal.

Objectives and methodology

Over June – August 2025, senior GCC officers held stakeholder meetings concerning LGR, focusing on services or matters of relevance to the council's work.

The objectives of the engagement process were to:

1. Ensure stakeholder views were taken into account as proposals for the single unitary and east/west two-unitaries were developed;
2. Gather intelligence about the impact of LGR on stakeholder organisations;
3. Understand what aspects of LGR were of most importance to stakeholders, as well as any concerns; and
4. Gauge appetite and interest for future involvement in LGR (and Devolution).

To achieve these objectives, the following information was provided as part of each meeting:

- An update on how LGR proposals and Devolution discussions are progressing in Gloucestershire;

- An update on the LGR policy position of GCC's new Cabinet (i.e. to be agnostic and evidence-led in considering both a one unitary and two unitary model); and
- The timetable and key processes underway.

A total of 41 meetings were held. Many of the meetings, particularly those involving Gloucestershire associations, were attended by multiple attendees. Some stakeholders chose to write to us after the meeting setting out their views. Where consent has been obtained, this correspondence is appended.

Analysis of responses – key themes

The stakeholder discussions have been synthesised and anonymised. Four key themes, together with short quotations, are set out in the table below:

Theme 1: Structural options

There was a preference amongst stakeholders for a single county unitary model. This was described by one as the *"only workable solution"*. Further comments included that two unitary authorities would *"create economic chaos and a social divide"*, whereas a single unitary would *"open up opportunities, creating aspiration"*.

Creating two unitary authorities was referred to as *"risky"*, potentially resulting in *"confusion, disruption and duplication"* and creating *"barriers and bureaucracy where it isn't needed".*

Further comments included that a two unitary model would *"exacerbate existing disparities, particularly in rural western areas such as the Forest of Dean"* and *"create greater division over time, due to the further potential different political leadership".*

Concerns were expressed that *"job losse*s", *"delay and disruption in services"* and *"loss of local identity"* would follow as a result of a two-unitary solution.

Some stakeholders supported a two-unitary model for its targeted benefits. One noted potential *"savings of £4–6 million annually"*, and argued that the West would not be disadvantaged, citing evidence of *"affluent people moving to the Forest of Dean"*.

Stakeholders that supported the two unitary model emphasised its potential to deliver more localised and responsive governance. As one stakeholder observed, *"Splitting the county would enable each authority to focus on the priorities unique to their communities, providing services that truly reflect local needs."* Another stakeholder remarked, *"With two unitaries, there's an*

opportunity for healthy competition, driving innovation and ensuring better value for our residents."

An education leader commented that a two unitary model would *"lead to a long period of protracted negotiation and uncertainty"* and *"make the delivery of public services more challenging and not achieve the same economies of scale"*.

Special school headteachers felt that a two unitary model would *"make it even more challenging to place all the children who require specialist provision in an appropriate setting – sufficiency is already one of the key barriers".*

Stakeholders from the adult social care sector raised a concern about continuity of care under a two unitary model with one stakeholder feeling that, *"waiting times for adult social care services would increase."*

Theme 2: Local identity

There was widespread support for a stronger neighbourhood approach and a place model to drive increased engagement, with repeated calls for *"co-design"* and consultation informing boundaries.

Faith and voluntary leaders highlighted that *"relationship is at the heart of what it means to be human,"* urging that *"an emphasis on neighbourhood-level engagement and the creation of place-based structures"* should underpin reform.

Theme 3: Devolution/strategic partnerships

Some stakeholders felt that West of England Combined Authority (WECA), based on patterns of economic activity and travel, was the right devolution partner. However, there was also support for considering broader Devolution models (e.g., three counties) to maximise economic opportunities and regional collaboration.

Some also saw merit in partnerships with Herefordshire / Worcestershire, especially for sectors like cyber and agri-tech. However, there was also concern that Devolution would result in "*loss of local voice"* and *"funding competition*".

Theme 4: Finances and implementation

A stakeholder stated that analysis shows *that "single unitary models incur lower transition and ongoing costs"* and *"clear benefits in annual gross savings, payback period and net savings".*

Business groups felt that *"the two unitary model would create confusion and lack identity outside of the county. They also felt that it would weaken our ability to promote the place for investment and create an artificial economic split"*.

Stakeholders mentioned the benefits of simplification, cost savings, and better use of resources under a single unitary authority.

A risk highlighted was the potential for *"paralysis in any of the seven existing authorities, during the period of change/implementation and public sector realignment"* and whether *"the anticipated savings being promoted in the LGR take into account the investment required to create the best countywide service departments"*.

There was also concern over central government interference potentially impacting coordinated implementation.

Stakeholder Meetings

Engagement took place with the following organisations and individuals:

Name	Organisation	Notes
Alistair Russell	Laing-Russell	Business Membership Group Member
Sam Holliday	Federation of Small Businesses	Representing 4,000 small business members in Gloucestershire
Helen Bojaniwska, Chair	Gloucestershire Society of Local Council Clerks (SLCC)	
Mark Gale, Chief Executive	Gloucestershire Gateway Trust	
Matt Lennard, Chief Executive	Gloucestershire VCS Alliance	On behalf of VCSE Strategic Partnership and Integrated Locality Partnership representatives in Gloucestershire. Eight organisations represented in meeting
Barbara Piranty, Chief Executive	Gloucestershire Rural Community Council (GRCC)	
Simon Pickering, Chair	Energy Business Group	14 individuals in meeting representing different businesses and other organisations
	Gloucestershire Association of Primary Headteachers	Numerous attendees

Name	Organisation	Notes
	Federation of Principals – Further Education and Higher Education	Numerous attendees
	Gloucestershire Association of Special School Headteachers	Numerous attendees
	Gloucestershire Association of Secondary School Leaders	Numerous attendees
Francesca Inman	Chief Executive, Cheltenham Business Improvement District	
Andy Bates, Chief Financial Officer	Gloucestershire College	
Robert Nettleton, Chief Executive & Martyn Blackman, Chief Investment Officer	Bromford Housing	
Ruth Dooley, Partner	Hazelwoods LLP	
Anonymised	CyNam	
Rupert Waters	Social Value Gloucestershire	
Simon Carey, Managing Director	Barnwood Construction	
	Northrop Gumman	Name not shared for security reasons
Rob Stemp	Deepminds Ltd	
Bishop Rachel Treweek	Bishop of Gloucester	Joined by senior clergy including Deans of the Diocese
Michael Ratcliffe	MR Insurance Services & Cheltenham Chamber of Commerce	
	Adults Collaborative Board	A group of people with lived experience of adult social care
	Gloucestershire Care Providers Association	GCPA Board Members: • Cathy Andrews • Chris Atkins • Claire Hopkins • Della Gilby • Josh Isaac GCPA Staff:

Name	Organisation	Notes
		• Pip Wilson • Riki Moody
Sarah Bell-Hartley	Barclays Bank	
David Goodall	FW Capital	
Suzanne Hall-Gibbins, Angela Edwards	C2S Ltd	Business membership organisation
Chris Farr, Regional Adviser (South West),	Country Land and Business Association (CLA)	
Michael Jones, Warden	The Honourable Company of Gloucestershire	
	Construction and Infrastructure Business Group	Numerous attendees
Chris Haine, (Chief Executive), Kerrin Wilkinson (Strategic Support Officer)	Gloucestershire Association of Parish and Town Councils (GAPTC)	
	Cyber Tech Business Group	Numerous attendees
Ruth Greenwood (OPCC Chief Officer), Chris Nelson, (PCC), Maggie Blyth, Chief Constable	Gloucestershire OPCC, Gloucestershire Constabulary	
Sarah Truelove (CEO), Dame Gill Morgan (Chair)	Gloucestershire Integrated Care Board	
Phil Smith, Chief Executive	Business West	
Matt Bishop MP, Sir Geoffrey Clifton-Brown MP, Alex McIntyre MP, Simon Opher MP, Cameron Thomas MP, Max Wilkinson MP, Roz Savage MP	Gloucestershire Members of Parliament	

Written responses

Some stakeholders, listed below, chose to provide further feedback via email or letter. Their responses, together with any other organisation or association who chose to write to GCC, are included below:

Name	Organisation
Matt Lennard, Chief Executive	On behalf of VCSE Strategic Partnership and ILP Representatives in Gloucestershire
Maggie Blyth, Chief Constable	Gloucestershire Constabulary
Stephen Limbrick, Chair on behalf of the group	Construction and Infrastructure Business Group
Fran Inman, Chief Executive	Cheltenham BID
Bishop Rachel Treweek	Diocese of Gloucester
Gill Blackwell, Chair	Hucclecote Parish Council
Gloucestershire FE Colleges (Federation of Principals)	Gloucestershire College, South Gloucestershire and Stroud College, Cirencester College, Hartpury College and University, National Star College
Hollie Wakefield	CyNam and Cyber Tech Business Group Member
Kerry Cunningham, Co-chair	Gloucestershire Association of Primary Headteachers (GAPH)
Barbara Piranty, Chief Executive	Gloucestershire Rural Community Council (GRCC)
Steve Rudd, Associate Director of Strategy and Transformation and Gloucester GP	Gloucestershire GP Collaborative (GDOC)
Sarah Truelove, Chief Executive	Gloucestershire Integrated Care Board

Response from VCSE sector

Date: 05/08/2025
From: VCSE Strategic Partnership and ILP Representatives in Gloucestershire
To: Siobhan Farmer and Alex Khaldi

Firstly, we would like to thank Gloucestershire County Council (GCC) for engaging meaningfully with the VCSE sector throughout this process. We have welcomed the opportunity to take part in open and constructive dialogue about the future of local government in our county.

As representatives of the voluntary, community and social enterprise (VCSE) sector, we recognise the scale and significance of this reorganisation. The decisions taken will shape how communities are supported and how services are delivered for many years to come. It is therefore vital that the voice of the VCSE is heard and that the implications for our sector, our communities, and the wider population are carefully considered.

One of Gloucestershire's longstanding strengths lies in its coterminous structure. This alignment has enabled strong partnership working, effective strategic planning, and efficient use of resources across the public and VCSE sectors. A move away from this model, by dividing the county into two separate unitary authorities, would risk undermining these strengths. For the VCSE sector, the consequences could include duplicated relationship management, more complex and fragmented commissioning and monitoring processes, and reduced capacity for coordinated delivery at scale. These risks carry both financial and operational costs, particularly for organisations already operating under significant pressure.

We are also particularly concerned about the impact of structural changes on smaller, place-based VCSE organisations. Many of these groups are deeply rooted in specific districts and neighbourhoods and play a critical role in supporting their communities. Splitting the county into two unitary authorities could dilute the visibility and influence of such organisations. In contrast, a single countywide unitary, if designed with strong local engagement in mind, offers a more stable platform for inclusive, locally responsive governance. It would allow for consistent commissioning approaches, clearer points of contact, and reduced administrative complexity, ensuring that smaller groups are not required to navigate multiple, potentially inconsistent systems.

We understand that the move to a unitary structure is part of a broader national policy direction, as outlined in the 2024 English Devolution White Paper and reiterated in the June 2025 *Local Government Reorganisation: Summary of Feedback on Interim Plans*. These documents emphasise the importance of clear rationale in decision-making, particularly where population thresholds are concerned. However, we do not believe the case for splitting Gloucestershire into two unitaries

has been sufficiently made. There is currently no robust evidence that such a model would improve outcomes for residents or offer any advantage to the VCSE sector.

On the contrary, analysis from PricewaterhouseCoopers suggests that single unitary models incur lower transition and ongoing costs compared to two-unitary models. Furthermore, Gloucestershire's unique geography and the clustered distribution of employment, housing, and inequalities suggest that a single structure would be better placed to support equitable development. There is a real risk that a split would exacerbate existing disparities, particularly in rural western areas such as the Forest of Dean and reduce the strategic capacity of each authority to respond to future challenges.

We appreciate the ongoing engagement from GCC officers and the commitment to working with the VCSE. Our shared ambition is for a Gloucestershire where all communities thrive, inequality is actively addressed, and services are delivered efficiently, equitably, and in partnership with the people and organisations who know their communities best.

We believe that a single unitary authority offers the clearest path toward this vision by preserving the strengths of our current system while enabling more joined-up and responsive governance.

We look forward to continuing this important conversation and to working together to co-produce a future that works for everyone in Gloucestershire.

Signed,
Matt Lennard
CEO, Gloucestershire VCSE Alliance
On behalf of the VCSE Strategic Partnership and ILP Representatives

Response from Gloucestershire Constabulary

Gloucestershire Constabulary
Police Headquarters
No.1 Waterwells, Waterwells Drive
Quedgeley, Gloucester. GL2 2AN
www.gloucestershire.police.uk

Jo Walker

Chief Executive

Gloucestershire County council

Shire Hall

Gloucester

Thursday 7th August 2025

Dear Jo,

I am writing to congratulate you on behalf of Gloucestershire Constabulary on your recent Ofsted inspection of your Children's Services. This is a tremendous achievement and a complete acknowledgement of the work that Ann and your wider leadership team have done to drive through improvements for children in Gloucestershire.

I know that my chief officer group, led by our ACC for Crime, Rich Ocone, are absolutely clear that working with and supporting you in keeping children safe is a top priority for Gloucestershire Constabulary. I am reassured that you and I have already met as Lead Safeguarding Partners to outline the key areas in which we will work together, and I am supportive of our joint plans for the new multi-agency safeguarding arrangements. Clearly, from our perspective it is vital that policing, alongside the local authority and health service fully discharge our joint statutory safeguarding duties and you have our full chief officer group support.

There are a couple of areas I thought it may be worth reinforcing as we move forward.

Multi Agency Safeguarding Arrangements (MASA) and MASH

Firstly, I am aware that Rich will continue to work with Ann in overseeing the detail of evolving multi agency safeguarding arrangements and will continue to work with Ann and partners to make sure these are successful. We are keen to help shape these, and I know Rich and Ann will update us accordingly. We can also keep close in our CEO roles so we can create the most effective and coordinated response to child protection concerns, with improved communication and information sharing and putting children's needs and interests at the heart of our joint MASA. From our

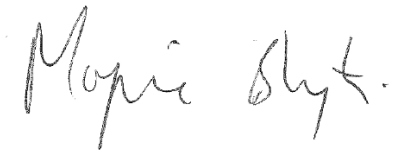
perspective our one MASH enables one front door for our respective workforce to ensure the right assessment, identification of risk and support for children requiring intervention or protection happens swiftly and robustly- we are keen to maintain one MASH to ensure consistency and coordination across the partnership, and swift assessments to respond to all children in need/requiring protection. I know that as you and colleagues work through your plans for local government and devolution you will be considering different options for the local authority. From a policing perspective, as PCC Chris Nelson and I reinforced when we met you and Cllr Lisa Spivey, we much prefer the positioning of one unitary authority so we can maintain and improve our coordination of vital capability, such as the MASH. Moreover, as we increase our analysis of our joint responses for children at risk of CSEA, criminal exploitation, going missing and the ever-increasing harm of online threat, we know that a focus on coordination, pooling of resources, identification of specialist capability and careful and swift risk assessment will be key. We are keen to ensure that we are not in a position where we dilute our current MASH capability but build on it together as a crucial front door to a range of services across the County, including police investigation and resource where required.

Secondly, we are really keen to ensure that our front-line workforce continues to receive the latest training and CPD on the threats facing children in our County. I am pleased that we have identified the joint training day on CSEA in February 2026 and we are also keen to develop our approach to responding to online harm, perhaps working with wider colleagues in CT policing and wider law enforcement. I know there are early meetings to take this forward already.

Finally, we will be disseminating our improvements since our national child protection inspection undertaken in December 2024 – we are pleased that we are making progress and would be keen to share this with you over the next month.

I look forward to working with you,

Kind regards,



Maggie Blyth, KPM MA, BA (Hons)
255558
T/Chief Constable
Gloucestershire Constabulary
Police Headquarters | No. 1 Waterwells | Quedgeley | GL2 2AN
Office – 01452 752313
www.gloucestershire.police.uk | X page | Facebook page

We are committed to being an anti-discriminatory organisation. This means not only acting in a non-discriminatory way, but addressing systemic inequalities, disadvantage and discrimination.

Response from Business Groups

For the kind attention of David Owen, Director of Economy and Environment, GCC

Ref: Responses from the Construction and Infrastructure Business Group on the Local Government Re-organisation and Devolution plans.

Date: 4th August 2025

LGR – Have you a preferred model?

- Our preference is the Single County Unitary Option.
- This should help to enable and create planned and managed strategic, sustainable growth and social regeneration throughout the county.
- It should ensure a whole county approach which does not disadvantage businesses in rural areas or urban hubs that continue to need long term investment and regeneration solutions
- This option meets the Government's size criteria

Devolution – Have you a preferred geography?

- Our preference is for Gloucestershire to be a standalone, single authority.
- If we are required to combine with another authority as part of Devolution, then we consider that South Gloucestershire has more established and relevant links with important business sectors in Gloucestershire including: - Defence, Cyber, Advanced Manufacturing, Creative, Education and Sustainable Energy.

What are the big economic opportunities from change?

- Planned strategic and sustainable growth.
- An opportunity to create centralised exemplar departments for key services e.g.
  A Planning / Sustainable Environmental Growth Team. This should be a new team with strong leadership and resources combining: - Planning, Highways (building on their delivery capacity), Planning Legals, mains Services, Water, flooding etc., working around solutions to, and promotion of, a Countywide Strategic Plan for economic regeneration and development (already in its infancy). This could be an exemplar department providing a proactive, quality and effective service across the whole of the county in a balanced, joined up and integrated manner.
- A Utilities Czar could be a new role focusing on coordination and cooperation between all parties over challenging needs and requirements of development and infrastructure, helping to minimise log jams and delays across the county. This would also help to avoid strategic, countywide, economic planning needs being affected by individual district priorities and boundaries e.g. J10 and Cyber Park.It is accepted that to create such a department and

service will require new investment in new professional skills and resources, however, the benefits are anticipated to be considerable in assisting sustainable growth and regeneration for Gloucestershire.

- It is hoped that the anticipated savings being promoted in the LGR take into account the investment required to create the best countywide service departments as the one broadly outlined above.

What are the economic threats from change?

- It is anticipated that there will be job losses (especially at senior level) to achieve LGR.
- In the short term there is likely to be delay and disruption seen in services, however, it is anticipated that these issues will be outweighed by the long-term benefits.
- Lack of investment in the right personnel and resources in the detailed planning, establishment and management of new operational service structures will impact on the effective change and value of LGR. This is essential for their success.
- Risk of reduction in Government funding to the county following savings promoted in LGR.

Response from Cheltenham Business Improvement District

From: Fran Inman
Date: Thursday, 7 August 2025 at 11:16
To: OWEN, David
Subject: Local Government Reorganisation and Devolution

Good morning David,

Please see below how devolution and local government reorganisation could provide both pros and cons for Cheltenham Business Improvement District:

Key Threats to the BID from Devolution

- Loss of local voice: A larger devolved authority may centralise decisions, weakening Cheltenham's influence.
- Funding competition: Risk of resources being directed to bigger centres.
- Reduced business engagement: Complexity and distance from decision-making may disengage levy payers.
- Policy misalignment: Devolved priorities may not reflect Cheltenham's business needs or placemaking ambitions.

Opportunities for Cheltenham

- Access to greater funding: For transport, regeneration, and skills development.
- Stronger strategic voice: If BIDs are embedded in governance structures as a key stakeholder, we can influence regional economic strategy.
- Joined-up planning: Opportunity to align infrastructure, town centre growth, and skills strategies.
- Cheltenham as a hub: A chance to position Cheltenham as a key economic and cultural centre within a devolved geography.

Cheltenham BID does not take a position on the political decision of whether devolution or LGR should happen. However, if change does occur, we believe the voice of Cheltenham's businesses must be represented, local decision-making should be protected, and opportunities for investment in our town centre should be maximised.

Always happy to discuss further.

Best wishes,
Fran

Francesca Inman

Chief Executive

Response from Diocese of Gloucester

The Rt Revd Rachel Treweek
Lord Bishop of
Gloucester & Anglican
Bishop for HM Prisons
The Bishop's
Office 2 College Green,
Gloucester, GL1 2LR
bgloucester@glosdioc.org.uk
Tel: 01452 835511

+RG/AODP
29 July 2025

Siobhan Farmer
Director of Public Health
Gloucestershire County Council
Shire Hall
Westgate
Street
Gloucester
GL1 2TG

Dear Siobhan

Reflections following our recent meeting on Local Government Reform

Thank you again for meeting with the Bishop's Staff Team on 17 July 2025 to explore the implications of the proposed Local Government Reform for Gloucestershire. We appreciated the opportunity to contribute to your thinking at this formative stage and to reflect together on both the risks and opportunities for our communities.
As you noted, the shift to a unitary authority model raises complex questions of identity, representation, and place.

Our discussion focused heavily on the importance of identity. Gloucestershire as a whole lacks a single, cohesive identity. Many communities are orientated more towards external centres - Bristol, Birmingham, London, and even Wales—than towards a unifying county centre. This is reflected in regional media coverage, patterns of travel, and informal networks. Interestingly, many communities feel as if they are 'on the edge' (e.g. bordering Oxford, Wales etc).

As a diocese (covering an area from just south of Stratford upon Avon to just north of Bristol-the old ceremonial county) we have two Archdeaconries (Gloucester and Cheltenham), each with a number of what we call deaneries (clusters of parishes). The Gloucester deaneries are Gloucester City, Stroud, Forest, Wotton and Severn Vale; and the Cheltenham deaneries are Cheltenham, North Cotswolds, Tewkesbury and Winchcombe, and Cirencester.

About 10 years ago we did an analysis of the social context, and Benjamin Preece Smith (Diocesan Secretary) would be very willing to share that with you. One of the things we observed is three key areas in the county: Forest, Vale and Hill. Neither Cheltenham or Gloucester are big enough as single entities and are quite insular settlements. In Gloucestershire, a number of settlements are quite old, and several of the market towns act as hubs for the villages and surrounding areas e.g. Northleach/Moreton-in-Marsh,

Stow and Chipping Campden.

Each of the 42 dioceses in the church of England are grouped into regions. This diocese is formally in the SW region but we have removed ourselves to the West Midlands region as we have far more in common with Worcestershire and Herefordshire (not least regarding events such as the Three Counties Show and the Three Choirs Festival). We are curious about how connections with these counties are being considered in proposals.

Gloucestershire is actually relatively small compared to many large cities and counties, and we are concerned that the discussion is around dividing what is already small into something even smaller. What does this mean in terms of critical mass for the University, our schools etc? Dividing the county into east and west could weaken rather than strengthen local governance and complicate partnerships—particularly in areas such as education and health, where scale and consistency matter.

When we appoint new clergy to the diocese we always talk about the diocese as being large enough to be well-resourced and small enough that we know each other. In all of your discussions, we would want to keep an emphasis on relationship, which is something that is not emphasised enough in political thinking, new housing, governance and policies etc. As Christians, we believe that relationship is at the heart of what it means to be human and to be made in the image of God, and we believe that people of different faiths and of no faith would recognise the fact that, in the UK, we have diminished the importance of relationship across so much of our society. We would want you to be asking questions about relationship and community. Thus, we strongly support your emphasis on neighbourhood-level engagement and the creation of place-based structures that reflect where people actually live and relate. This is what we endeavour to live as a diocese, encouraging local community engagement.

We were encouraged to hear that any neighbourhood model will be co-designed and that consultation will inform how boundaries are drawn. We would welcome the opportunity to support that work and would be glad to contribute parish and deanery mapping to help build a fuller picture of local networks.

In all of this, there are also questions about social identity. There is undoubtedly much greater diversity in Gloucestershire than some people wish to acknowledge, not least regarding social background and racial diversity. In areas which are often characterised as middle-class and affluent, there are many pockets of hardship, and much greater inequality than many people want to recognise. I also believe we have to be asking the hard questions about why young people choose not to come back to Gloucestershire once they have left home.

Finally, it was good to acknowledge that, in all these discussions, we are certainly not saying that the structures we currently have work really well. Some district councils are performing better than others, and we note that authority and influence are pretty poor in other areas. For example, we would certainly want to acknowledge that the city centre in Gloucester has changed hugely, and no one seems to have a grip on owning it or bringing about change.

Having said that, we did also comment on the fact that Gloucestershire punches above its weight when it comes to charities, voluntary organisations and the third sector. How will proposed changes affect the activity of civil society?

Finally, we were glad to note the commitment to continued engagement and consultation.

Thank you again for your time and partnership. Please do keep us informed as the process develops - we would be very glad to remain part of the conversation.

Yours sincerely.



Copy to:

Benjamin Preece-Smith (Diocesan Secretary)

Lucy Taylor (Head of Diocesan Comms & Engagement & Deputy Diocesan Secretary)

gloucester.anglican.org
01452 835511 bgloucester@glosdioc.org.uk
@BishGloucester /Diocese.of.Gloucester Diocese of Gloucester
Bishop's Office | 2 College Green | Gloucester | GL1 2LR

Registered in England: 162165. Registered Office: Gloucester Diocesan Board of Finance, Church House, College Green, Gloucester, GL1 2LY. Registered Charity Number: 251234.

Response from Gloucestershire Further Education Colleges

Campus, Llanthony Rd
Gloucester GL2 5JQ
0345 155 2020

29th July 2025

To whom it may concern

Response from the Gloucestershire Further Education Colleges to Unitary Authority Proposals for Gloucestershire

We welcome the opportunity to contribute to the ongoing discussion around local government reform in Gloucestershire. Further education (FE) colleges play a central role in delivering technical and professional education, improving social mobility, and addressing the region's skills needs. Whilst we will ultimately work proactively with whichever model is adopted, we strongly favour the creation of a single all-county unitary authority. This model offers the most coherent, equitable and strategic approach to supporting learners, employers, and the county's economic development.

We believe that option has the following advantages:

- Strategic Alignment Across the County - A single authority enables a joined-up approach to economic development, transport, housing, and education -all of which are essential to integrated skills planning.
- Simplified Relationships - Colleges currently operate county-wide, working with multiple stakeholders and systems. A single point of engagement would reduce duplication, streamline planning, and improve accountability.
- Efficient Commissioning and Funding - Fragmentation risks are likely to increase commissioning costs, with more overhead and bureaucracy -meaning less funding reaches the learner. A single authority offers economies of scale and consistent commissioning decisions.
- Equitable and Impact-Led Resource Allocation - A county-wide authority is better positioned to allocate capital and revenue funding where it delivers the greatest impact for learners and employers, not simply within rigid administrative boundaries.
- Unified Voice in Devolution and Investment - A single authority would be a stronger and more coherent partner in any future devolution deals or combined authority arrangements. This is essential to secure fair access to devolved budgets and influence key strategic decisions.

Whether through an East/West division or a "Greater Gloucester" configuration, we have significant concerns about the impact of splitting Gloucestershire into two unitary authorities. Some of us already have experience or working across multiple local

government areas and the attendant administrative and strategic consequences which include:

- Multiple EHCP and Transition Pathways - Working with multiple local authorities risks increasing inconsistent approaches to EHCPs, transition planning, SEND funding, and placement decisions - adding complexity and creating inequity for vulnerable learners.
- Diverging Priorities and Governance - having to align to multiple sets of political priorities, governance structures, and reporting processes. This reduces clarity for the communities we serve and adds pressure to strategic and operational planning.
- Fragmented Transport, Careers and Support Services - Inconsistent approaches to transport policy, travel subsidies, and wraparound support (e.g. mental health, careers advice) can undermine participation and progression -especially for rural and disadvantaged learners.
- Risk of Geographic Ring-Fencing of Funding - If future funding (including capital) becomes restricted to specific local authority areas, this creates distortions in investment decisions and reduces the ability to deliver provision where it is most needed - especially where college catchments span boundaries.
- Devolution Misalignment - There is a risk that different parts of Gloucestershire could become aligned to different combined authorities or mayoral areas. This would fragment influence, reduce coherence, and complicate FE's ability to engage with regional priorities.

In conclusion, based on our experience and the operational realities of FE delivery, we believe that the single all-county unitary model represents the best option; and have reservations about any structure that splits the county and introduces duplication, inconsistency, or competition for resources.

We look forward to engaging further as proposals develop.
Signed on behalf of:

Gloucestershire College, South Gloucestershire and Stroud College, Cirencester College, Hartpury College and University, National Star

Response from Hucclecote Parish Council

HUCCLECOTE PARISH COUNCIL

Ms Jo Walker Chief
Executive
Gloucestershire County Council Shire
Hall
Westgate Street
Gloucester
GLI 2TJ

13th August 2025

Dear Ms Walker

Hucclecote Parish Council discussed the recent Local Government Re-organisation (LGR) engagement exercise that is being undertaken at its 28 July meeting, and we could not understand why the survey did not clearly ask which of the three current LGR options we preferred.

As we could not state our preference, we felt we had to set out why we strongly support the single countywide unitary option.

- It is likely to result in the most cost effective and efficient delivery of services.
- It will also provide the opportunity for early Community Governance Reviews would enable the uniting of fractured communities to be considered: -
  (a) The majority of the existing Hucclecote Parish within Tewkesbury and the remainder ofHucclecote currently within the City of Gloucester.
  (b) The creation of a single parish to cover Coopers Edge, which currently straddles the border between Tewkesbury Borough and Stroud and is split between three parish councils.

It should also be noted that the single unitary option is also supported by the County Councillor for the Brockworth Division, as well as the Borough Councillors for the Churchdown Brookfield and Hucclecote Ward.

We believe the suggested two unitary split of East and West Gloucestershire would permanently re-enforce the current difficult local boundaries for local communities.

We therefore seek your assurance that you will actively advocate for a single unitary council for the county.

Yours sincerely



Gill Blackwell
Chair of Hucclecote Parish Council

CC:
Cllr Lisa Spivey, County Council Leader
Alistair Cunningham. CEO Tewkesbury Borough Council Cllr
Richard Stanley, Tewkesbury Borough Leader
Jon McGinty, MD of Gloucester City Council Jeremy
Hilton, Gloucester City Leader
Alex McIntryre, MP Gloucester
Cameron Thomas, MP Tewkesbury Max
Wilkinson, MP Cheltenham Matt
Bishop, MP Forest of Dean Dr Simon
Opher, MP Stroud
Sir Geoffrey Clifton-Brown, MP North Cotswold

Response from Cyber Tech Group
From:
Sent: 07 August 2025 12:37
To: CAMPBELL, Karen
Cc: WOODHOUSE, Paul
Subject: Re: Local Government Reorganisation and Devolution

Hello Karen,

Thank you for the note. Please find my feedback below.

Whilst I do not have a deep understanding of the implications of selecting a single unitary authority, or two unitary authorities, or the Greater Gloucester model, my preferred model would be a single unitary authority. There are ovbious benefits like cost savings and efficiencies, alongside the ability to develop a strong narrative and plan for the whole of Gloucestershire which competes on a national and international level. I am not sure how much I buy into a couple of arguments specifically put forward about the east/west model. Specifically:

1. Whether the average person understands the role of their local councillor (especially the younger population), how often they utilise their local councillor and their MP, and whether a person identifies with their ward, their town/city, or their county. It would be interested to know what the turnout of the population voting in the local elections versus the general election in the 6 authorities, as this would likely show how much of the population would be affected by less localisation.
2. Forest of Dean being put into the clean energy cluster - they have huge advanced manufacturing capability and so would surely align more with the defence and advanced manufacturing organisations in Tewkesbury for example
3. Cotswolds in the secure tech cluster - not sure what capability exists in this authority for this rationale

Regarding devolution, preference seems to be WECA as government has made it clear funding will be funnelled through mayoral authorities, yet there is a slight concern that Gloucestershire's tech cluster will be overshadowed by Bristol and Bath, and the funding they have already received. If mayoral elections could be held for the Herefordshire/Worcestershire option, I would welcome more information on Worcestershire and Herefordshire's key sectors to think about alignment. There is a defence alignment that I am aware of already, for example.

The main economic opportunity I see is funding, and how the accessibility of this funding will be impacted by the option we choose.

The main threat I see is the disparity in the services and the costs associated with them provided by each Council, and how future service provision and associated costs will be calculated, as this is what will impact the average person the most. E.g. Cheltenham and Gloucestershire's licensing fees are more expensive than the other 4 authorities, and Stroud has the highest council tax rate in the county. I also mentioned above about competing for funding with other established strategic authorities and the places within them.

Thank you,

Member of Cyber Tech Group – Name withheld for security reasons

Response from Gloucestershire Association of Primary Headteachers (GAPH)

Director for Education
Gloucestershire County Council Shire Hall,

Westgate St
Gloucester GL1 2TG

Sent by email to Kirsten Harrison cc:
Ann James

16.07.25

Dear Kirsten

Thank you so much for the meeting on Thursday 10.07.25 and for introducing us to the potential change for Gloucestershire.

As Co-Chair of Gloucestershire Association of Primary Headteachers (GAPH), on behalf of the Executive, I am writing to you in your capacity as Director of Education, to set out our views on this proposal.

We would have waited until the GAPH Executive Meeting in September, which you will attend, however, as you explained in your presentation, you have a meeting on 17th July 2025, with the Chief Executives group and we therefore wanted to make our position clear on this very important issue for Gloucestershire as a whole and in particular the Education sector, for which the District Councils have no jurisdiction, nor responsibility.
The Government Criteria for Change:

- *Establish a single tier for the whole of the county area*
- *The right size to achieve efficiencies, improve capacity and withstand shocks (aim for 500k population or more)*
- *High quality public services with specific mention of 'crucial' services (children's, SEND, homelessness)*
- *How devolution will be unlocked*
- *Enabling stronger community engagement and neighbourhood empowerment*

As conveyed by the unanimous views of the members of GAPH Executive, with representation from each Partnership, we hold the view that one, single tier, Unitary Authority is the only workable solution for Gloucestershire, with reasons including the following:

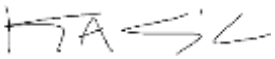
- Children's Services and the Education sector's current working model (countywide) for statutory duties (for example: Admissions, EHCPs and timely access to support for children with SEND, Hospital Education, Social Care) would need to be split in an East/West model, creating potential difference and division over time, due to the further potential different political leadership.
- How would the Designated Schools Grant this be apportioned fairly and equitably, with

schools located as they are geographically in an East/West model?

- The potential costs of splitting the single authority responsibilities of Children's Services-Education into two authorities will lead to a long period of protracted negotiation and uncertainty. You cited Northamptonshire as an example of disaggregation, which, having created two Authorities in 2018, only in August 2024 finally came to agreement over the financial settlement.
- The standard for a Unitary Authority is 500,000. The current county size is 650,000. Creating East and West would make those two Authorities smaller than the proposed standard size, which would making the delivery of public services more challenging and not achieve the same economies of scale that a single Unitary Authority would make, creating higher overall vulnerability to 'shocks'.
- How would the current countywide High Needs debt be apportioned fairly, in a two-tier system?
- Forming two Authorities from one, would create an additional border for the county and result in working an 'out of county' services model, for services which sit within the same postcode.
- The geography of schools means that schools working in Partnerships, Federations and/or in Gloucestershire MATS could find themselves working with two different Authorities, making effective and efficient running of these settings more challenging.

In your meeting with the Chief Executive Group, we are seeking written reassurance that you and Ann James, as our representatives, advocate strongly the view of GAPH and our position that a single county Unitary Authority is the only workable solution to this Government Strategy.

Yours sincerely,



Kerry Cunningham
Co-Chair of GAPH and Executive Headteacher of The Longlevens Primary Federation

Response from GRCC

Formal Feedback from GRCC
Local Government Reorganisation County Options

There is an overwhelming need for the whole process of Local Government Reorganisation to be properly managed due to the risk of becoming a major distraction, take longer to implement, and cost significantly more to achieve meaningful rationalisation.

GRCC has a role in supporting Parish and Town Councils, whose concern is that this first tier of government will get either bypassed or forgotten or, worse still, be required to take on, possibly by default, delivery of local services without the wherewithal, especially financial, to ensure continued, viable service delivery.

The concept of Local Neighbourhoods, with populations of between 20- 50,000 is an interesting one, possibly comparable with the old Rural District Councils. However, there are currently major questions which remain unanswered:

- How would the Local Neighbourhoods be configured?
- Where would the local alignments be set?
- What responsibilities and powers would they have?
- What relationships would they have with the upper tier?

Within these higher population configurations, smaller communities, particularly those situated on the periphery of the county, perceive a risk of being subsumed into larger clusters with which they perhaps share neither natural connections nor established relationships. More concerning still is the fear of being entirely overlooked. Such communities frequently express apprehension that their perspectives will be marginalised, leaving them with limited or no opportunity to have their voices acknowledged or meaningfully heard

GRCC is in a position to support local communities in the transition to new models of local government and enable them to step in to help provide local services. Most of these services are currently delivered by District Councils which may otherwise struggle, for example: management of allotments, playing fields and open spaces; maintenance of highway verges; management of public toilets etc.

It is noticeable that there is no GCC cabinet member with a specific remit / portfolio for rural. Gloucestershire is the 33rd most rural authority in terms of its geographic area. It is in the top 20% of authorities in terms of rurality, and 87.5% of its area is classified as rural, therefore a specific rural focus would be beneficial. We would of course be happy to support this work as rural specialists.

A question that needs to be answered also is whether Devolution would come with a recalculation of funding for Gloucestershire.

Options Appraisal

Single Unitary Authority

A single unitary authority meets government criteria in terms of size, will be more cost effective, and will eliminate the confusion of the current fragmented county and district council system.

It also preserves 'Brand Gloucestershire' – a clear identity which is stronger with all constituent towns and parishes taken together, speaking with one voice on a regional and national level. 'Brand Gloucestershire' is more marketable as a single countywide authority. It would provide a strong, cohesive entity which would play its full part in the operation of any upper tier Strategic Authority, irrespective of whether Gloucestershire is combined with WECA or with Herefordshire / Worcestershire.

The single unitary option will also provide an opportunity to create strong community hubs to address local matters, supporting small communities.

The single unitary option makes eminent sense and is the only option which would achieve the Government's stated objectives, with the following benefits:

- With a population of circa 652,000 it would meet the Government's aspiration for Councils to have a population of over 500,000. One unitary authority would be a considerable size, but would mirror the county's current footprint.
- The current three tier authority model is outdated and creates dissention between the differing tiers, especially over planning, waste management, etc., as well as causing confusion for communities as to 'who does what'. The single unitary is simpler, saving the most amount of money, and communities already know this governance model.
- It has the potential to achieve significant operational and financial savings by:
    - removing duplication of service delivery, e.g., planning, waste collection / disposal, etc.;
    - rationalising property, particularly office accommodation;
    - securing economy of scale benefits generally
- It has the potential to:
    - strengthen the County's voice at national and regional levels;
    - achieve effective strategic alliances with Health, Police, Highways;
    - provide more attractive career pathways for staff to progress, which will in turn help recruitment and retention;
    - enable proper countywide strategic thinking and planning to take place, especially in terms of:
        - land use disposition;
        - new housing allocations;

  - proper forward planning;
  - development of creative economic models to enhance growth and employment;
  - flood management
- It removes confusion in the minds of the general public and could provide opportunities to establish genuine 'One Stop Shop' Local Service Delivery points around the county
- From the perspective of the rural communities we serve and smaller VCS organisations and groups we support, there is a real fear around loss of voice and loss of funding to support the most vulnerable

East and West Option

The only real benefit is the improvement on the current seven district and county council arrangement for most of the reasons set out above, albeit to a lesser extent due to there still being two councils operating within the geographic county area instead of one. It would also allow communities to keep a local identity, and not feel as if they are being swallowed up by the county.

If this option were to be pursued there would be an overwhelming case for not aligning it around the current District Council configuration because this would perpetuate, indeed exacerbate current boundary anomalies and tensions. Much of this is currently being played out in the case being made by Gloucester City Council to create a Greater Gloucester to overcome largely historical inconsistencies created in 1974 when Tewkesbury Borough Council in particular was established.

The major disadvantage of the two-council split model is that it could lead to the disaggregation of services currently delivered on a countywide basis by Gloucestershire County Council, such as Social Care, Education, Fire and Rescue, Highways Management, Libraries, County Farms, etc., into two separate organisations. It raises concerns around consistency and quality of care provision, such as mental health and social care services, where Gloucestershire County Council has taken on responsibility for more of these services from Gloucestershire Health and Care Trust.

More boundaries add complexity for support and service delivery, contracting may be become a logistical nightmare, and ultimately it could result in fragmented and inequitable service provision across the county. This split of services into two organisations could be avoided by joint board or lead authority models being put into place, but this would largely defeat the object of adopting this option in the first place. This model would also exacerbate cross-border issues, especially in health provision, cause confusion for communities, and cause a wealth divide.

Overall, adoption of this model would be a major missed opportunity to create an organisation with identity and presence, and many of the benefits of a single council option would be significantly diluted or dissipated.

General Issues

Affordable Housing delivery

Local Government Reorganisation offers both potential benefits and drawbacks in terms of affordable housing delivery. While the pros include greater clarity for residents, potentially more efficient and cost-effective service delivery due to larger scale, and easier strategic decision making, these must be balanced against a list of cons that might involve a key potential loss of local responsiveness, difficulties in achieving projected savings, and challenges in boundary alignment with functional economic areas.

Rural areas already face significant challenges in delivering affordable housing due to a combination of factors including: high house and land prices; area designation; relatively low wages and limited development opportunities. These issues are exacerbated by factors like second homes, short-term lets and restrictive planning policies.

Differing policies within the districts in terms of planning and allocation policies are also an issue. When we add that loss of “localness and clarity” that is essential in the delivery of truly affordable homes to those challenges, the difficulties faced by those in dire housing need in rural Gloucestershire become insurmountable. We have started to witness areas within rural Gloucestershire that are becoming gated, dying communities with unbalanced demographics, where socioeconomic development is stagnant. The reduction in the number of Local Registered Providers is becoming a real issue as more and more merge, with a significant and detrimental effect on the delivery of small numbers of homes in rural villages. However, Rural Affordable Housing is finally being recognised as a significant and important topic for everyone. It is about much more than just building a house; it is actually the foundation of everything else in our society.

Affordable housing must become a KPI of every major sector, be they Public or Private, and this is especially true in rural areas such as Gloucestershire. Affordable Rural Housing delivery is crucial for a thriving economy and society, impacting heavily upon various industries and communities as well as public sector bodies such as health and education. This means that policies and initiatives, including Local Government Reorganisation, must consider the housing needs of rural regions. In the refresh of the Leadership Gloucestershire group, GRCC feels decision makers should seriously consider a place for planning. Having this level of expertise available to the group would enable efficient countywide strategic planning to take place in terms of housing, land use, and the economy.

As LGR emerges in Gloucestershire it is vital that there is a uniform and consistent approach from all sectors at all times. The more boundaries and borders there are, the more difficulties and costs faced by sectors such as Health, Education and the Police, and the delivery of Rural Affordable Housing becomes even more challenging. This at a time when all sectors need to be able to work coherently and seamlessly together in order to deliver sustainable, quality services that can also work together, forming strong partnerships.

One Health Authority, one Education Authority, one Police and Emergency Authority, one Planning Authority, and one Rural Affordable Housing organisation could mean faster, more efficient partnership-based delivery of affordable housing. Lack of affordable housing affects all

areas including economic growth, social equity, health and wellbeing, education, hospitality and retail.

In conclusion, as a neutral, independent Voluntary Sector organisation and rural specialist whose role is to represent and serve the communities of Gloucestershire, we hope to have provided a balanced and constructive view/opinion of both options based on over a century of understanding and knowledge of the county, along with our multi-level connections and reach into those communities.

August 2025

Response from GDOC (Gloucestershire's GP provider organisation)

Hi Alex,

We tested this with our GP Collaborative Summit today, comprising all of our Gloucestershire GP practices and Primary Care Networks. There was a clear majority decision from our practices, which has informed the response that I'm pleased to provide below:

Gloucestershire General Practice Collaborative, on behalf of our general practice providers across Gloucestershire, welcome the opportunity to comment on proposals for future local government structures in our county. Our primary objective in providing this feedback is ensuring that the health and care system best supports the delivery of high-quality, sustainable and integrated care for our population and the patients we serve on a daily basis.

We believe that a **single unitary authority for Gloucestershire** would bring clear benefits compared to establishing two smaller unitary authorities:

1. **Clearer Alignment with NHS Structures**
   - Gloucestershire is a clearly defined 'place' within the new Gloucestershire and BNSSG Integrated Care Board (ICB). Furthermore, our primary care structures are also aligned to our Gloucestershire footprint, such as our GP Collaborative, our Local Medical Committee (LMC) and our Local Pharmaceutical Committee (LPC). A single unitary authority would align with this geography, avoiding the duplication and fragmentation of relationships that two authorities would inevitably create.
   - This alignment would streamline joint planning for population health, prevention, and service delivery.

2. **Simplified Partnership Working**
   - General practice is engaging in system-level programmes, through our GP Collaborative, our Primary Care Networks, our Integrated Locality Partnerships and our ICB. Having one local government partner makes collaboration more straightforward, saving time and resources.
   - A two-unitary model would double the number of political, officer, and governance forums practices would need to engage with, stretching already limited leadership capacity in primary care.

3. **Consistency for Patients, Communities and Neighbourhoods**
   - A single authority provides residents with a more consistent offer for public health, social care and other services that directly affect health and wellbeing.
   - In contrast, a two-unitary model risks divergence of policy and provision, leading to inequities between communities and confusion for patients, potential boundaries in our

recognised primary care networks and neighbourhoods and inequalities being exacerbated by two-unitary authorities with potentially quite divergent economic positions.

4. **Efficiency and Value for Money**
   - From a health system perspective, the fewer the boundaries, the less duplication in commissioning, contracting, and monitoring arrangements. This efficiency ultimately releases more resource for front-line services.
   - At a time when both the NHS and local government face severe financial pressures, avoiding duplication is essential.

5. **Stronger Strategic Voice**
   - A single Gloucestershire authority would be a more robust and influential partner when working with NHS England, regional bodies, and government departments on health and care issues.
   - It would reduce the risk of competing priorities or fragmented lobbying across different councils.

Conclusion

Gloucestershire General Practice Collaborative strongly favours a single unitary authority for the county. This model is most compatible with the way health services are organised now and also with the future plans for organisation, best supports effective partnership working, and minimises duplication. Most importantly, it provides the clearest and fairest route to improving outcomes for patients, communities and neighbourhoods across Gloucestershire.

With best wishes,

Steve

Steve Rudd MBA | Associate Director of Strategy and Transformation and Gloucestershire GP Collaborative Management Lead | G DOC LTD | Quayside House, Quay Street, Gloucester, GL1 2TZ | Mobile: 07795 685090 | Email: stephen.rudd@nhs.net

Response from Gloucestershire Integrated Care Board (ICB)

NHS Gloucestershire
Shire Hall
Westgate Street
Gloucester
GL1 2TG

PA. tara.carr@nhs.net

2nd October 2025

Jo Walker
Chief Executive
Gloucestershire County Council
Shire Hall
Westgate Street
Gloucester
GL1 2TG

(sent via email)

Dear Jo

Local Government Reorganisation

Following the ICB Board seminar agenda item on Local Government Reorganisation and Devolution that Sarah Scott led I am writing to give the feedback on behalf of the ICB to the three options presented. The strong preference from the ICB is for the Single County Unitary option. The key points that we felt supported this view were as follows:

- Having developed social services at a whole Gloucestershire level we think it would be a backward step to move to two social work teams for the county. This would increase complexity for those working in our NHS services, to have two sets of processes and teams to engage with to ensure the flow of people through our care.
- There is also significant risk that we have a higher concentration of people with complex needs living in the West of the County because as commissioners of services that have been driving to achieve best value for the whole county we have physically placed certain care settings where property prices are lower (in the West of the County). This is a risk that in an East/West split of unitary authorities that there will be an imbalance of responsibility for high need groups that will cause unforeseen consequences and exacerbate inequalities.
- The PWC financial option analysis shows a clear advantage to having a single unitary authority from a financial perspective and in a period when all public services are under considerable pressure to deliver best value to our population we feel this is an important consideration.
- We recognise that we need to work closely with you to ensure we continue to shift our care models to meet the changing needs of our population. This is best done in neighbourhoods and we feel the option described as Greater Gloucester may disturb some of those natural communities and the good strong working that we have developed in our localities.

Becky Parish has shared evidence with Siobhan and Sarah from previous public engagement exercises which shows little difference in what is important to people from their public services.

I hope this response is helpful as part of the business case development and I am happy to discuss this further at our next 1:1 if that would be helpful.

Yours sincerely

Sarah Truelove

Sarah Truelove
Chief Executive Officer
NHS Gloucestershire

cc: Shane Devlin
Jane Cummings

Appendix 5: Detailed Options Analysis

This appendix provides additional detailed commentary assessing a **Single Unitary Authority (1UA)** and **Two Unitary Authorities (2UA - East and West)**, against the nine criteria agreed for this business case.

Detailed analysis of **single unitary (1UA) model** against criteria

Criteria	Sub-Criteria	Alignment Summary	RAG
1. Sensible single tier of local government	A) Establishes a single tier of local government for the whole of the area concerned.	Under a 1UA model, the current councils would be replaced by a single authority (albeit legally GCC would be a 'continuing authority'). This would remove structural duplication and create one point of democratic and operational accountability for all services across Gloucestershire. • **Removes two-tier complexity** – Seven existing councils (one county, six districts) would be replaced by one organisation delivering all functions • **Simplifies resident experience** – Residents would contact one council for all local services, reducing confusion and referral between tiers. • **Consolidates statutory roles** – All key statutory officers would sit within a single executive team, streamlining leadership and governance. • **Enables consistent locality governance** – The Place Model for Gloucestershire proposes establishing Neighbourhood Partnerships in every part of the county. A single council can embed this consistently across all areas, regardless of historic district structure. • **Supports whole-system working** – Joined-up delivery becomes easier when strategic and local functions sit within one structure. • **Meets MHCLG expectations** – The model delivers a complete single-tier structure for the area, as defined by government policy.	G

	B) Sensible economic breakdown: with a tax base which does not create undue inequalities.	The 1UA model allows financial variation across Gloucestershire to be managed within a single council. This enables redistribution between areas, protects against localised risk, and supports a unified approach to tax and budget strategy. • **Enables pooled resources** - Council tax, business rates, and government funding can be allocated based on need across the whole county. • **Supports financial equity** – A single UA can help drive more equitable growth across the county as a whole balancing any disparities that might exist in productivity and growth across individual areas at the moment (e.g. Business Growth in the East is 1.10% v/s -1.15% in the West). • **Simplifies council tax alignment** - Aligning current tax levels has reduced political and legal complexity under one council. • **Increases fiscal stability**– A larger tax base and merged reserves lower the risk of localised budget pressures and increases the ability to effectively manage Local Authority Debt (£819 for countywide v/s £674 in the East and £948 in the West). • **Allows single financial strategy** – One Medium-term Financial Strategy (MTFS) and capital programme can be used to balance investment and risk county-wide, including place-based regeneration and neighbourhood infrastructure.	G
	C) Sensible geographic breakdown: which will help increase housing supply and meet local needs.	The 1UA model keeps Gloucestershire's existing administrative and strategic footprint intact. This aligns with current health, community safety, transport, and economic delivery boundaries, reducing disruption and supporting long-term coordination. • **Alignment with existing partner geographies** – The ICB, Police, Fire and NHS all operate on a countywide footprint, reducing need for renegotiation or duplication e.g. in terms of engagement activities. • **Maximise the Council's influence with the ICB -** Given the proposed changes with ICBs looking to take on more local authority areas, retaining a single UA across the county will enable Gloucestershire to retain a strong voice.	G

		• **Avoids the creation of administrative internal borders** – A 1UA structure removes the risk of current countywide services or geographies being split (e.g. Children's admissions, SEND pathways, acute hospital discharge pathways etc). • **Supports more strategic spatial planning** – The model enables Local Plans, Local Nature Recovery Strategies, and the Gloucestershire Infrastructure Strategy to be aligned across the county. This would ensure strategic projects such as The Forum project in Gloucester City and the Berkeley Site low carbon energy park in the West are planned in a coordinated way, alongside shared housing and infrastructure corridors that link Gloucester, Cheltenham, and Tewkesbury • **Simplifies strategic countywide structures that already exist** – There are already numerous examples of successful countywide partnerships across all seven councils including Climate Leadership Gloucestershire; Local Visitor Economy Partnership (LVEP); Gloucestershire Strategic Housing Partnership etc. These partnerships enable strategic countywide coordination and leadership for things like housing priorities, rough sleeping, cross cutting climate issues etc. A 1UA model makes this even simpler to drive with a single council. • **Strategic management of homelessness and housing land supply**- A single council could be better positioned to take a more joined up approach to homelessness and housing supply countywide, which could reduce variation in housing capacity and support in meeting the increasing demand and complexity particularly in temporary accommodation across the county. This would allow strategic allocation of sites, directing development to areas with greater capacity while managing demand hotspots. Consistent policy could be applied to meet the countywide shortfall against the five-year supply target (East has 4.97 years and West has 3.83 years, with a countywide shortfall of 4.37 years).	
2. Right-sized local government	A) A population of 500,000 or more (unless	The 1UA option: • **Meets statutory benchmark** – The combined population of ~659,000 is above the MHCLG target of 500,000 or more.	**G**

	specific scenarios make this unreasonable)	• **Supports strategic scale** – This population size enables the council to manage key statutory functions (e.g. ASC, education, planning) with scale and consistency. • **Aligns with successful precedent** – The population aligns closely with other approved unitaries (e.g. North Yorkshire, Cornwall, Buckinghamshire).	
	B) Supports efficiencies and value for money for council taxpayers	By consolidating governance, systems, and staffing, the 1UA model offers significant opportunities to reduce duplication and generate savings over time. • **Delivery of potential net revenue savings from reorganisation of ~£21.1m per annum.** • **Reduces duplication** – Only one set of ICT systems, governance structures, and senior statutory roles e.g. one Director of Adults Social Care Services (DASS), one Director of Public Health (DPH) etc. • **Streamlines service delivery** – A single operating model for each service (e.g. One revs and bens team and set of policies and not seven) avoids overlapping teams and inconsistent standards or support offers for residents across the county. • **Contracting economies of scale** – Significant benefits from aggregation of contracts (particularly noting bringing together Line of Business system contracts for service areas etc). In addition to this, increased economies of scale and procurement leverage of procuring a single contract (as opposed to six smaller ones) for specialist services e.g. cyber, contaminated land, asbestos etc.	G
	C) Improves capacity and supports the council to withstand	The 1UA model offers stronger resilience, especially in high-cost and high-risk areas like ASC and CSC. In addition to this, through aggregation of some fairly small and stretched teams, there is increased resilience in areas where there are already significant workforce recruitment and retention challenges and scarce professional expertise and capacity.	G

	financial shocks	• **Enablers better management of significant imbalances in demand across the county –** In particular, within ASC, there is significantly higher demand and cost for working age adults (specifically for supported living) between the East and West of the county. A single UA can deploy resources (incl. finances and staffing) more flexibly to service this imbalance in demand. • **Increased workforce resilience for highly qualified and specialist service professionals –** Skills sets which are already highly scarce (with national shortages) e.g. environmental health officers within public health, planners, social workers benefit from being in single organisation to enable pooling of expertise, support succession planning and reducing the risk of exacerbating workforce challenges through duplicating or splitting staff across multiple organisations (or creating competition between authorities for the same staff). • **Frontline workforce flexibility –** A single UA can flexibly deploy front line staff incl. casual staff across the county to support delivery e.g. Library staff currently working across multiple libraries or even the Registrars team maintaining a single pool of c.80 casual celebrants who are deployed flexibly to deliver weddings and ceremonies across the county. • **Supports statutory resilience** – A single set of statutory roles reduces recruitment pressure and minimises significant additional ongoing costs of senior roles. • **Protects Place Model delivery** – Central support functions (finance, HR, data) are key to enabling locality-level delivery across Gloucestershire. • **Strong support resilience for front-line services –** Core services such as fire and rescue rely on local authority support services and financial support e.g. HR, legal, finance etc to support delivery. A single larger UA is likely to offer strong financial resilience and create less administrative burden of apportioning out support costs etc. • **Decreased senior management capacity –** Due to the aggregation of senior management roles, the 1UA model could potentially have a reduced capacity at senior levels to sustain financial shocks	

	D) Manageable transition costs	A single authority model allows for less structural duplication and avoids the cost and complexity of standing up two separate organisations, through reduced disaggregation • **Requires creation of only one new authority and legal structure, minimising transition costs** - estimated to be ~£21.3m. *Assumption based on assuming a continuing authority being in place.* • **Simplifies legal setup** – Only one constitution, shadow authority, electoral review, consultation and governance framework would need to be designed, approved and run. • **Reduces portfolio and programme duplication** – A single implementation portfolio required to manage the transition and implementation. • **Lower ICT migration and integration costs –** Currently shared countywide systems such as Liquid Logic (for ASC) would not need to be disaggregated or duplicated. In addition to this, data and systems migration could be managed on a service by service once (as opposed to multiple sets of systems migrations activities for each service). Lastly, one single website can be developed for the new council. • **Minimises duplication of senior roles** – One executive team avoids the need to recruit and fund parallel statutory leadership posts which can be significantly costly. • **Reduces duplication of county input –** Current county council stakeholders can be a part of a single implementation portfolio and would not need to spend additional time in multiple meetings, governance forums, working groups (i.e. county council stakeholders would need to be involved in all conversations if there were multiple UAs being created given disaggregation implications). • **Reduced risk of disruption to traded services –** Reduced risk of disrupting effective traded services that operate on a countywide footprint particularly in relation to services provided to schools.	G

3. High quality, sustainable services	*A) Improves local government and service delivery, avoiding unnecessary service fragmentation*	The 1UA model would preserve current integrated delivery structures in areas like social care, education, and public health. A single unitary within Gloucestershire, if designed with strong local engagement in mind, offers a more stable platform for inclusive, locally responsive governance. Colleagues currently operate countywide, working with multiple stakeholders and systems. A single point of engagement would reduce duplication and improve accountability. • **Preserves current service integration** – Existing countywide delivery in areas such as transport, ASC, CSC, SEND, and safeguarding would remain intact, avoiding risk to safeguarding, statutory thresholds, and pathway coordination. • **Supports end-to-end planning** – Joined-up pathways for prevention, care, education, and housing can be planned across one structure (particularly important for high-risk residents who cross multiple services). • **Enables minimum disruption to significant transformation and improvement journeys that are ongoing** – e.g. there are significant multi-year transformation programmes planned in ASC which could continue with minimum disruption under a 1UA scenario. • **Minimal disruption to multi-agency partnership arrangement** – Only one set of safeguarding boards, ICB pathways, youth justice panels, and place-based health partnerships are required, making service collaboration easier and more effective. • **Resilience through scale and leadership continuity -** Professional Service Leads consistently highlight that larger authorities reduce risk during transition by retaining experienced senior leadership teams and service delivery infrastructure. • **Challenges of delivering services across diverse geographies -** The 1UA model would require the integration of two urban centres (Cheltenham and Gloucester) and expansion of capabilities to meet the rural needs across the county. This could complicate existing operating models and ways of working and risking inconsistencies in access and quality that could endure into the future.	G

		• **Increased aggregation risk** – A 1UA model would require aggregation of six district-specific services into one collective service which is likely to be significantly complex e.g. aligning six different council tax support schemes etc.	
	B) Opportunity for public service reform including where this will lead to improved value for money	The 1UA model enables a unified transformation strategy and consistent investment in digital tools, analytics, automation, workforce planning, and shared infrastructure, all of which are already underway through the transformation initiatives and emerging Place Model design. • **Creates a single platform for change** – Transformation programmes in ICT, workforce, data, and estates can be delivered countywide. • **Enables shared innovation** – AI, automation, and digital case management tools can be designed once and used everywhere. • **Supports cultural alignment** – One council avoids divergence in practice or priorities, allowing consistent reform over time. • **Improves analytical capacity** – Shared data infrastructure can support predictive and population-level service planning, particularly linking to public sector partners like Police and NHS – this is key to continuing to drive a focus moving away from eligibility to focus on prevention and early intervention (i.e. not waiting for the crisis to happen first). • **Backed by service insight** – Service leads across ICT, libraries, revenues and benefits, asset management, housing and homelessness etc consistently stated that a 1UA model would remove duplication in systems and governance, strengthen programme alignment, and enable investment to scale across the county. • **Improved strategic influence and collaboration with partners –** A single larger UA is likely to have more influence and scale to negotiate with local and national partners incl. Educational institutions, DWP, ICB etc to drive stronger system-wide leadership and delivery of improved shared outcomes locally.	G

		• **Increased scale and financial resilience to innovate –** A single larger UA is likely to have access to large amounts of resources (workforce, finances, connections with others) to innovate, fail fast and learn. This is critical to driving improvement and reform. • **Better value for money** – In services such as ASC, CSC, public health and commissioning, the scale of a 1UA model could provide better value for money through economies of scale and single strong voice in the market. • **Creation of a single trusted front door for residents and partners** – A 1UA model can retain a simple, universal, trusted front door for residents to simplify their experience but also drive efficiencies in contact and delivery.	
	C) Improves delivery of, or mitigates risk of negative impact on, crucial services	A single authority can manage variation in service demand and outcomes across the geography by redistributing resources and targeting investment based on need. This supports equity in access and outcomes, especially for crucial services such as social care, children's services, SEND and homelessness, and for wider public protection services including for public safety. • **Enables flexible resource allocation** – Investment can be targeted where demand is highest (e.g. higher ASC and CSC spend in the West) can be managed effectively. • **Improves consistency** – A single authority can maintain common standards and expectations for service access across the county, with flexibility built in at the point of delivery. • **Supports data-led prioritisation** – Systemwide data enables identification of emerging needs across urban and rural areas and supports early intervention strategies that can be locally delivered. • **No need for disaggregation of critical countywide services delivered to the most vulnerable in society** - Service leads across CSC, education, public health, and commissioning warned that two unitary authority models would pose risks of disaggregating safeguarding, school admissions, EHCP timeliness, statutory performance oversight etc. • **Reduces postcode variation** – Residents in different areas would experience equal levels of service and support which drives fair and equal access for all.	G

		• **Protects Multi Agency Safeguarding Arrangements (MASA) and MASH –** Minimum disruption to the single front door to make sure the right assessment, identification of risk and support can be provided to children at most risk who need to be protected. In line with engagement with stakeholders from the Police, *"a 1UA provides the best opportunity to continue to maintain and improve coordination of this vital MASH capability with a focus on driving consistency, pooling of resources and alignment"* between the Police and Local Authority workforce. • **No borders created between the county** – A countywide model makes it easier to coordinate placements for education or social care to be considered across a bigger geography without the need to negotiate potential 'out of county' placements if administrative boundaries were to be created. • **Addresses homelessness strategically** – A single housing and commissioning function can plan across high-demand urban areas (e.g. Gloucester and Cheltenham) and rural areas, ensuring consistent prevention and support offers.	
4. Meets local needs	*A) Meets local needs and is informed by local views*	While formal public consultation has not yet taken place, this options analysis has been informed by engagement undertaken with the public through surveys and in-person events, officers from service areas and partners across the county (including county council, district councils and other partners including Police, VCSFE, health etc). Many countywide partners, including further education, health, VCFSE, Constabulary and the Diocese, voiced strong support for a single voice and shared strategic frameworks to maintain coherence across Gloucestershire. The EQIA analysis that has been conducted also indicates that a single council could strengthen consistency in engagement with groups with protected characteristics (e.g. disabled residents, ethnic minority communities) by creating one countywide approach to inclusive communications and accessible consultation materials, reducing risk of variation in how voices are heard across areas. • **Reflects strategic partner input** - The 1UA structure aligns with preferences expressed by the NHS, Police, and some economic partners for a single interface, highlighting that a single accountable authority would reduce duplication and improve clarity for service users.	**A**

		• **Backed by some VCFSE organisations** – Some VCFSE representatives who have been engaged emphasised that a single UA would make partnership working and funding engagement "simpler and more consistent," reducing the duplication they currently face when working across multiple districts. • **Supported by some of the county's local business networks** – Feedback from business representatives, including the Federation of Small Businesses, highlighted the benefit of "one clear voice" for economic development, inward investment, and regulatory services, making Gloucestershire easier to promote to investors and government. • **Based on current delivery structures** - The model builds on the existing approach to ASC, CSC, public health, transport - all delivered at county scale. • **Enables future local engagement** - Under a 1UA model, the council would have capacity to design and invest in community-level consultation structures. • **Capacity to combine strategic oversight with local delivery-** Services such as HTST, EHCP delivery, and ASC benefit from being managed by a single larger UA which has the scale to sufficiently manage and resource but with the ability to flexibly deploy resources locally. • **Places local voice at the centre** - The Place Model workstream (co-led by GCC and partners including OPCC, VCS Alliance, and ICB) has designed mechanisms for neighbourhood engagement within a single authority. • **Service-led locality feedback** – Discussions across ASC, CSC, libraries, ICT and education consistently supported a single authority with locally delivered services. Officers favoured retaining local footprints for operational delivery, noting this was already how people experience services. • **Risk of reduced local visibility if locality model is not prioritised** – Several stakeholders, including parish councils and VCSFE representatives, expressed concern that without sustained investment in neighbourhood governance, a single UA could appear more distant from communities, particularly in rural areas such as the North Cotswolds and the Forest of Dean, where access to decision-makers is already seen as limited.

	B) Improves / mitigates risk to issues of local identity, cultural and historic importance	The 1UA Model has been designed to protect and celebrate the many places of Gloucestershire. 267 parish councils currently cover the majority of the county and our Neighbourhood Partnership proposals seek to decentralise services and give greater voice to communities of place, interest and identity. • **Local identities –** There could be concerns that a single UA could dilute the distinct cultural, social and economic identities of Gloucestershire's two key urban centres (Gloucester and Cheltenham) which therefore may not gain local support. However, this can be mitigated as noted below. • **Civic identity retained** – Town and parish councils, mayoralties, and ceremonial roles would remain in place. For Gloucester a parish (city council) would be created, and similarly for Cheltenham, a parish (town council) would be created. These new parishes would serve to strengthen the identity and significant cultural and historic value of each city/town within Gloucestershire • **Allows for place-based branding** – Services can retain local naming, visual identity, and signage to reinforce place association, a priority raised in the Diocese and VCFSE stakeholder engagement responses. • **Reflects community affinity** – Feedback from planning, libraries and safeguarding services emphasised that residents associate more strongly with place-based identities than with institutional structures, making it essential to maintain visible local identity alongside a single governance tier. • **Neighbourhood Partnership proposals will make the new council closer to the places people know.** – The model will create a coherent offer for populations of 30k-50k, bringing the council and decision making closer to residents • **Supports visibility of place** – The new authority can retain ward and locality names to reflect place-based identity across the county. • **Builds on community infrastructure** – Areas like the Forest, Stroud, and the Cotswolds already have strong place-based partnerships in place. The 1UA model enables these current strengths to be built on with a more powerful place-based emphasis and approach.	**A**

		• **Builds on current area-based practice** – e.g. ASC and CSC already hold case review forums and safeguarding panels at area level, often aligned to the current districts. This culture of place-based accountability would continue to be retained and formalised under the single authority. • **Successful precedents exist** – Unitaries such as Buckinghamshire and North Yorkshire have adopted area boards and neighbourhood forums to maintain local visibility, improve outcomes and encourage community participation.	
	C) Addresses local concerns	The 1UA model enables county-wide service planning while allowing targeted investment in places with higher levels of need. This supports consistency of offer while maintaining flexibility to respond to local variation. • **Could be perceived as overcentralisation –** A single larger UA could be perceived by some stakeholders and residents as moving services further away from people and creating less understanding and tailoring of services to meet local needs. However, this can be mitigated with robust locality governance and retaining operational delivery close to people (as is the case already e.g. with locality based social work teams etc). • **Supports differentiated planning** – Strategic services (e.g. ASC, education) can be commissioned based on local demand and vulnerability indicators. • **Addresses inequality** – The model enables planning across areas with different outcomes (e.g. West: 16,609 children in low-income families per 100k vs East: 12,274). The 1UA model maintains the ability to respond strategically while allowing delivery to reflect place. • **Place-sensitive commissioning already in use** – Commissioners in ASC and Education noted that funding allocations already account for variation in deprivation, demand and access (e.g. funding per capita is higher in the West for ASC and in the East for transport access). A 1UA model protects this flexibility while enabling oversight of equity countywide • **Supports coherent infrastructure and regeneration investment** – Officers stressed the value of having one capital planning and housing function able to target investment into high-need areas (e.g.	**A**

		brownfield regeneration in the West; affordability and access issues in the East), rather than splitting strategic capacity across two smaller councils. EQIA findings highlight current East–West disparities in transport access for disabled and older residents, and a 1UA model enables these to be addressed in a single transport accessibility strategy linked to Local Transport Plans.	
5. Supports devolution arrangements	*A) Helps to support devolution arrangements / unlock devolution*	The 1UA model simplifies engagement with Whitehall and regional partners. • **Streamlined governance** – A single authority avoids internal fragmentation, simplifies representation, and strengthens Gloucestershire's strategic negotiating position. A single council gives partners a single door in for strategic collaboration and funding opportunities. • **Improves visibility and scale** - A bigger footprint and unified leadership increase Gloucestershire's credibility and profile in national negotiations. • **Compatible with existing regional structures** – Gloucestershire currently aligns with the South West for funding and some aligned service delivery (e.g. South West Ambulance Service) and also shares ties with the West Midlands (e.g. through economic corridors and shared events). A single council can better preserve overlapping relationships and flex across both without splintering Gloucestershire's strategic position or regional partnerships. • **Improved clarity in negotiations** – Members and senior officers highlighted that a single unitary would allow Gloucestershire to present itself with clarity in devolution negotiations, and avoid unnecessary complexity in areas like housing, infrastructure and skills. • **Attractive investment platform** – A single council is better positioned to attract investment in growth sectors like advanced manufacturing, cyber, and clean energy, which operate across county boundaries. These areas require joined-up strategic leadership and investment. • **Improving transport connectivity -** There are already plans in place across the county to improve transport connectivity. Devolution offers opportunities to build on this and connect Gloucestershire	G

		with other economic corridors enabling further regional collaboration and enabling residents to access further opportunities.	

	B) Sensible population size ratios between local authorities and any strategic authority	Under a 1UA model, Gloucestershire would join any future Combined Authority or Strategic Authority as a single partner, with a population of ~659,000. This contributes meaningfully toward the 1.5 million minimum benchmark used in current legislation and policy design for deeper devolution.
		• **Compatible with multiple strategic groupings to meet minimum population thresholds by and large –** With one voice, Gloucestershire can engage in potential Combined Authorities including:
		  ○ Gloucestershire + West of England Combined Authority (WECA) Core: 1.6m
		  ○ Gloucestershire + WECA (incl. North Somerset): 1.81m
		  ○ Gloucestershire, Herefordshire and Worcestershire: 1.45m (falls a little short of the 1.5m threshold).
		  ○ Gloucestershire, Oxfordshire + Swindon: 1.63m
		• However, concerns were noted around the relative size of a single Gloucestershire Unitary Authority in comparison with other partners in a Combined Authority. For example, in the case of a WECA option, Gloucestershire would be the largest partner in WECA, with a population of c. 659,276, compared to Bristol's c.472,400, South Gloucestershire's c.290,400 and Bath and North East Somerset's c.193,400 (population figures based on ONS 2021 census). This could potentially make a single unitary less appealing for other partners.
			G

6. Local engagement and empowerment	*A) Enables stronger community engagement*	The 1UA model removes local district councils but can introduce new forms of local representation and democratic engagement. Its success in this area would depend on strong designs and investment in locality arrangements. Some partners expressed concern that community engagement in a 1UA model must be deliberately designed, with one noting: 'if you don't build in real localism, people will feel even further away".	G

		• **Could be perceived to be further away from communities –** A larger authority may be perceived by some stakeholders to be moving further away from communities with a much larger and more diverse geography to consider. • **Requires active design** – The model does not automatically strengthen participation; new structures would need to be developed (a process already initiated through the Neighbourhood Area Partnerships proposed by the Place Model programme). • **Supports consistent frameworks** – A single council can create countywide standards for local structures including Neighbourhood Area Partnerships. • **Avoids duplication of democratic processes** – One tier of governance reduces overlap and potential confusion over responsibilities (a key concern in feedback from the VCFSE sector and the Diocese). • **Can be designed to enable inclusive local representation** – Governance can be shaped to reflect towns, parishes, and historic communities across Gloucestershire. • **Rooted in ongoing local work** – The Neighbourhood Partnership model, co-designed by GCC, OPCC, the ICB, and the VCS Alliance, is already testing place-based forums that bring residents, councillors and service teams together to shape local priorities. • **Allows for a strengthening of capacity to support engagement** - The 1UA delivers the highest overall savings of options being considered (c.£21.1m annual net savings). In turn, this may allow for its Neighbourhood Partnership proposals to be given greater financial support and expert officer capacity.	

	B) Delivers genuine opportunities for neighbourhood empowerment	The 1UA model allows the council to embed neighbourhood governance into its core structure, particularly through the development of Neighbourhood Partnerships and Locality Hubs. It can formalise new models of area-based working and build on existing parish and community networks. There are also projected to be greater financial benefits from a 1UA model (noted above), which can support investment in place-based working and visible local governance across the county. • **Facilitates locality working** – Existing family hubs, community wellbeing teams, and parish clusters can be aligned to formal locality areas, ensuring operational delivery remains close to communities. • **Enables shared design** – Area committees (formal sub-committees of a local authority that operate at a more local, geographical level) or Neighbourhood Partnership can be co-designed with communities and elected members. The Place Model being worked on already in Gloucestershire explicitly sets out a roadmap for co-production. • **Formalises locality governance** – Proposals are being co-designed with partners including OPCC, ICB and VCS Alliance, with clear plans for shared decision-making at place level. • **Supports consistent service access** – Local service offers can be standardised, targeted and resourced across the county. • **Backed by services and partners** – Service professionals including CSC, planning, and ASC leads stressed the importance of retaining area-based decision-making capacity, noting that local visibility matters for legitimacy. • **Raises the visibility and role of local councils and VCFSE organisations**: The creation of a Civil Society Covenant and a Local Councils charter elevate the role of vital local and hyperlocal organisations • **Protects equity of access** – A single council can strive to ensure that every locality, rural or urban, has the same opportunity to develop Neighbourhood Partnerships and access resources. However, this may sometimes be harder to achieve on such a big footprint.	G

		• **Reduces risk of divergence** – Feedback from ICT, Audit and Planning services highlighted that neighbourhood working is best enabled by shared systems, standardised training, and joint commissioning, which is possible under a 1UA model. • **Builds on existing models** – Several services (e.g. ASC, children's services, housing) already operate with area-based or district-level coordination. For example, in CSC, local safeguarding hubs, and area panels are already delivering place-based oversight. • **Risk of democratic deficit** – By removing layers of government people feel as though the unitary is far removed from their local issues which can decrease engagement.	
7. Environmental and climate protection	A) Ensures the new authority/authorities have clear capabilities to deliver existing and future climate and nature plans.	The 1UA model offers scale and continuity in environmental governance. It enables strategic investment, consistent targets, and stronger institutional leadership on net zero, nature recovery, and flood resilience while safeguarding key partnerships and plans. • **Preserves existing plans and partnerships** – Gloucestershire's Climate Strategy, Local Nature Recovery Strategy, Climate Leadership Gloucestershire and Strategic Flood Risk Management approach are all designed countywide and can continue seamlessly under 1UA. • **Enables scale of investment** – Environmental budgets, procurement, and staffing can be centrally coordinated, with local delivery shaped through Neighbourhood Partnerships. • **Avoids duplication of leadership** – A single structure prevents gaps or overlaps in environmental governance. • **Aligns with existing officer capacity** – Current small specialist teams in areas such as flood risk and climate strategy can be consolidated. • **Enables neighbourhood engagement** – Through the Place Model, the new authority can embed environmental priorities into Neighbourhood Partnership plans, empowering communities to lead on climate actions suited to local needs.	G

		• **Bolster the role of the Lead Local Flood Authority (LLFA) -** Pooled resources between county and districts, and the ability to direct those resources according to need across the whole county would maximise the resources we do have (i.e. whether based on the location of consenting and enforcement cases, schemes, planning consultations or individual flooding events). In addition to this, a single authority would have single ownership of Strategic Flood Risk Assessments (Levels 1and2) and could also drive a more coordinated approach to identification and delivery of flood alleviation schemes and associated bids to national funding	
	B) Reflects local priorities in areas with sensitive landscapes (e.g. Forest of Dean, Cotswolds AONB).	The 1UA model supports joined-up spatial planning and stewardship across protected landscapes. It maintains geographic continuity and ensures consistent protections across jurisdictional boundaries. • **Avoids splitting landscape governance** – Natural assets such as the River Severn catchment, Cotswolds escarpment, and Forest woodlands would remain under one set of policy and delivery arrangements. • **Supports integrated land-use planning** – The Local Plan and planning policy can incorporate rural, urban, and protected areas under one authority. Officers confirmed that issues like nutrient neutrality need consistent policy and joint delivery at county level. • **Retains current plans for Local Nature Recovery Strategy (LNRS)** – Developed at a county level over the past three years and to be delivered by upper tier / unitary authorities. • **Retains current infrastructure for biodiversity net gain (BNG)** – Gloucestershire Nature and Climate Fund (GNCF) is a not-for-profit body supported by all seven LAs to trade BNG development units within Gloucestershire • **Preserves cross-boundary programmes** – Flood schemes, biodiversity corridors, and green infrastructure plans are easier to deliver through one capital plan and Local Plan framework. • **Allows local tailoring within one system** – Local protections (e.g. Cotswold design codes, Forest regeneration priorities) can be embedded in area-specific planning and delivery through the Place Model.	G

		• **Supports rural stewardship through locality governance** – Parish partnerships and community networks, particularly in the Forest and Cotswolds, can be empowered through Neighbourhood Partnerships to influence local environmental strategy.	
	c) Builds on existing commitments (e.g. "Fairer Greener Forest", Climate Emergency responses).	The 1UA model provides the governance platform to protect, expand and align Gloucestershire's district-led climate initiatives. It strengthens monitoring and accountability while enabling communities to drive action locally. • **Does not erase local ambitions** – Protects locally developed climate action - Programmes such as "Fairer Greener Forest," Stroud CAN, and Cheltenham's net zero route map which can continue with local leadership but benefit from countywide funding, systems, and legal support. • **Allows integration of district priorities** – The new authority can build a single climate plan that draws on existing strategies. reducing duplication and aligning priorities without weakening local ownership. • **Supports accountability** – A single scrutiny framework allows monitoring of commitments made at both county and locality level. • **Enables targeted support –** Rural off-gas areas, high-deprivation urban communities, and at-risk flood zones can be prioritised in capital investment using a shared dataset and single capital plan. • **Backed by partners** – Stakeholders, including public health, VCFSE and environmental partners, emphasised that 1UA would simplify joint action on climate and support more joined-up community participation.	G

8. Civic engagement and participative democracy	*A) Promotes civic engagement and strengthens participative democracy.*	The 1UA model creates the scale and reach to invest in countywide civic engagement, while retaining flexibility for local communities to shape how they participate. It provides the infrastructure to support both digital and in-person engagement through the Place Model. • **Supports digital and in-person tools** – Investment in consultation platforms, community budgets, and resident panels can be made at county scale, supported by the central functions of the new council • **Embedded in service design** – Housing, planning, transport, ASC and CSC services are already designing resident input into locality plans and Local Development Frameworks. A 1UA allows this to continue without duplication. • **Protects equal access to voice** – A single model of civic engagement ensures that all areas, including rural parishes and urban neighbourhoods, can participate on equal terms. • **Supports community leadership** – Officers emphasised that strong place-based leadership is already being built through co-design pilots in the Forest and Cheltenham, and that a single authority enables these structures to scale. • **Anchored in Gloucestershire's tradition of community partnership** – The VCFSE sector and local clergy highlighted the need to maintain grassroots decision-making. The 1UA model can help to make sure the local voice can be protected and funded within a single, countywide democratic framework. • **Risk of democratic deficit -** Given LGR will reduce the number of elected councillors and create larger electoral divisions, this will increase the number of residents each councillor represents. This could risk a democratic deficit.	**A**

9. Inclusive growth and equity	*A) Ability to tackle disparities in wealth setting up one unitary authority or two unitary authorities.*	The 1UA model allows the council to address local disparities across the county through joined-up economic, transport, and skills planning with the ability to redistribute funding and focus support on areas of need. A single structure would be well-placed to support equitable development and reduce strategic risk. • **Enables countywide planning** – Economic development, employment, and regeneration can be designed to benefit the full geography, not just high-growth areas. • **Targets investment to areas of need** – Indicators show clear differences between areas (e.g. GDHI: £26,149 in East vs £21,191 in West, and job density is 1.01 and 0.82 respectively) that can be addressed through unified policy and without governance friction. The West also has higher deprivation scores (IMD 17.16 vs 12.71 in the East) and carries 60% of the county's children in low-income households - factors that a single authority can address through pooled resources, targeted regeneration, and shared preventative service funding. • **Reduces risk of postcode inequality** – A single structure avoids divergence in access to services or funding between two separate councils. • **Improves delivery of levelling up goals** – National funding (e.g. LUF, SPF, Homes England) can be more effectively coordinated through a single accountable body, improving Gloucestershire's attractiveness as an investment partner. • **Supports area-based targeting** – Through Neighbourhood Partnerships, the council can ensure each area has a local regeneration plan focused on its specific barriers to growth and access.	G

	B) Prioritises vulnerable residents and community-level regeneration.	The 1UA model allows for pooled budgets and shared commissioning strategies that prioritise support for those most in need. Vulnerability and deprivation can be addressed without artificial boundaries between areas. • **Supports consistent targeting** – Shared datasets and analytics platforms allow services to target support to where indicators show the greatest unmet need (e.g. West Glos: 16,609 children in low-income families per 100k vs 12,274 in East). • **Enables flexible, place-based intervention** – Services such as ASC, housing, and CSC already work with local partners (e.g. Family Hubs, VCFSE, schools) to deliver support through local forums, which would be retained and enhanced under 1UA. • **Simplifies cross-cutting delivery** – Services such as mental health, substance misuse, and housing need require coordinated input across teams. A 1UA allows wraparound offers to be planned centrally and delivered locally. • **Retains current safeguarding structures** – Countywide safeguarding boards, early help pathways, and integrated commissioning would remain intact, avoiding disaggregation risk. • **Builds from neighbourhood action plans** – The Place Model already includes a neighbourhood planning model for co-produced regeneration strategies, which can be aligned to countywide outcomes under a single council.	G
	C) Ensures that financial sustainability is not achieved at the expense of service levels.	A 1UA model enables savings and efficiencies through consolidation - not service withdrawal. It allows services to be protected by reforming back-office structures, harmonising systems, and pooling reserves, particularly important in high-cost statutory functions like ASC and CSC. • **Improves efficiency through strategic consolidation** – Consolidation savings can be achieved through shared platforms, aligned contracts, and joint infrastructure investment, as confirmed through extensive engagement with both upper and lower tier service professionals.	A

		• **Supports strategic commissioning and market shaping** – A single commissioning function can set consistent pricing, improve leverage with providers, and reduce fragmentation in markets such as ASC or education placements. • **Enables financial flexibility and cross-subsidy** – Shared MTFS, pooled reserves and countywide income allow high-cost services in one locality to be sustained without placing disproportionate strain on that area's council tax base. • **Reduces service fragmentation risk** – Disaggregation of statutory services like SEND and CSC was seen by officers as high-risk under 2UA. The 1UA model removes that risk entirely. • **Supports long-term value** – Investment in digital, prevention, early help and neighbourhood working can be delivered once, reducing cost over time without cutting access or quality. • **Reinvestment in frontline service delivery** – Most of the savings noted by service professionals are across back-office functions (and not directly from already overstretched front line teams). These savings can be reinvested back in front line delivery and interventions focussing on prevention and early intervention to drive improved outcomes. • **Countywide Dedicated Schools Grant (DSG) deficit projected to reach ~£234m by Vesting Day (1 April 2028).** If statutory override is not maintained or an alternative solution implemented, then both a 1UA and 2UA would face significant financial risks. • **Impact of the Fair Funding Review** – This also remains unknown at this time presenting further financial uncertainty to both 1UA and 2UA scenarios.	

Detailed analysis of **east/west two unitaries (2UA)** model against criterion

Criteria	Sub-Criteria	Alignment Summary	RAG

1. Sensible single tier of local government	A) Establishes a single tier of local government for the whole of the area concerned.	The 2UA model fully removes two-tier governance by creating two all-purpose councils. While this simplifies governance within each new authority, it introduces an internal boundary that cuts across several existing countywide systems and partnerships. • **Removes two-tier structure** – Both county and district councils would be replaced by two new single-tier organisations which meets the overall criteria. • **Simplifies local service access** – Residents would interact with only one council for all services within their local area. • **Establishes clear internal governance** – Each authority would hold its own statutory roles and make decisions independently.	G
	B) Sensible economic breakdown: with a tax base which does not create undue inequalities	The 2UA model creates two financially independent authorities. While their tax bases are broadly similar at the point of transition, underlying income, need, and reserve disparities mean each council would have to manage its own risk, cost pressures, and investment strategies. • **Creates separate tax bases and MTFSs** – The East and West would operate independent financial strategies, with no shared reserves or risk-pooling between councils. • **Similar tax base across both areas** - The 2024 tax-base (Band D equivalents after council tax support) for two-unitary authorities model, shows a tax base in the West of 49% compared to 51% in the East [62]. • **Potential fiscal disparities** – Local Authority Debt is much higher in the West (£948) compared to the East (£674) and there is also a higher household benefit claimant rate (17.87% in the West compared to 13.79% in the East). These pressures would need to be	A

[62] Council Tax Receipts, 23/24, MHCLG

		managed by each individual authority with limited ability to create more fiscal resilience overall e.g. through pooled reserves etc. • **Increased potential exposure for West** – Higher service costs particularly for ASC where spend per resident is £629 in West vs £405 in East. This is likely to put a significantly higher pressure on the West council given the majority of a unitary authority budget is attributed to ASC spend. • **Opportunities to drive economic growth based on the unique strengths of each authority –** Opportunities to drive a coherent narrative within each authority for their sector specialisms (Clean Energy in the West and Technology in the East). This will support in creating more job opportunities, upskilling young people and attracting inward investment to kickstart economic growth across both UA areas.	
	C) Sensible geographic breakdown: which will help increase housing supply and meet local needs	The proposed East/West boundary reflects historic district groupings but introduces a new internal division across some shared service areas and travel-to-work zones. While this may support visibility and identity at a local level, it creates complexity in coordinating planning, housing, transport, and environmental strategy, all of which currently operate at county scale. • **Builds on existing urban centres in the county –** Gloucestershire has two significant urban centres (Cheltenham and Gloucester) and the proposed East / West 2UA model aligns with these. In addition to this, the 2UA model is based on familiar district boundaries which will continue to enable the retention of unique local identities. This could also be helpful in designing place-based governance. • **Reduces alignment with partners -** The Police, Fire and Rescue, ICB, Education partners all largely operate on a countywide footprint currently and the creation of 2UAs would mean partners likely need to engage with two different organisations which is inefficient and can also drive reduced influence for each of the respective UAs.	**A**

		• **Each UA can retain its own housing and HRA –** There are currently two councils in Gloucestershire with their own housing stock (c.5,000 homes each) and Housing Revenue Account (HRA): Stroud and Cheltenham. In the proposed 2UA model, there would be minimum disruption or change required to this arrangement given one of these is in the West and one in the East. • **Challenges around private housing market** - Average house prices illustrate that the private housing market faces greater challenges in the West, where values are lower [63] (e.g. Gloucester £225,000; Forest of Dean £291,000) compared to the East (e.g. Cotswolds £419,000; Cheltenham £324,000), reducing profit margins and making it less likely that the private sector will deliver sufficient supply without public intervention. • **Variations in housing supply** –Homelessness is higher in the West compared to the East [64] (0.21% in the West and 0.11% in the East) with housing land supply following the opposite trajectory (lower in the West at 3.83 vs 4.97 in the East). This could result in more demand for housing in the West with less supply to meet this efficiently within the new UA borders. • **Risks inconsistency in spatial planning** – Without a shared framework, the East and West could pursue divergent housing policies, development standards, and regeneration priorities, which could make Gloucestershire less coherent in the eyes of investors and government. • **Fragmentation of strategic housing functions and engagement -** Fragmentation of delivery partnerships and engagement / negotiations with housing associations, developers, and Homes England, increasing the risk of inconsistency in policy, pipeline delivery, and tenant standards across East and West Gloucestershire.

[63] House Prices, 2025, ONS
[64] Homelessness, 2024, ONS

2. Right-sized local government	A) A population of 500,000 or more (unless specific scenarios make this unreasonable)	Under the 2UA model, each authority would have a population above the 300,000 minimum threshold, but below the 500,000 MHCLG guideline. The East would serve ~310,641 people and the West ~348,635. • **Meets the viability threshold** – Both authorities exceed 300,000 population, in line with recent two-unitary models (e.g. Cheshire East/West). • **Falls short of MHCLG guidance** – Neither authority reaches the preferred 500,000+ benchmark for strategic scale but this could enable each UA to target their resources and focus on manageable population sizes and geographies (noting both the East and West would each have a densely populated metropolitan area with surrounding rural areas). • **Comparable to successful precedent** – East (~310k) and West (~349k) align with other approved two-unitary areas such as Cheshire East/West, Dorset, and Somerset, which have demonstrated operational viability. • **Aligns with precedent** – Dorset and Cheshire provide examples of approved two-UA models operating at similar population sizes.	**A**
	B) Supports efficiencies and value for money for council taxpayers	The 2UA model can continue to offer some efficiencies within each authority, but also introduces duplication of systems, statutory posts, and governance. Gloucestershire also has some good examples of shared working across existing councils which can continue to be built on under a 2UA model (where beneficial and appropriate to do so). • **Creates duplication for county wide services** – County-wide infrastructure would likely need to be split or duplicated e.g. in relation to governance structures; statutory roles e.g. two Director of Children's Services (DCSs), DASSs etc; Upper tier service systems used by adults and children's services etc. This will reduce the overall net savings achievable in a	**A**

		2UA scenario (potential net revenue savings from reorganisation of ~£10.7m per annum under a 2UA model). • **Reduces potential economies of scale** – Whilst there remain continued opportunities to jointly commission specialist services e.g. cyber between the two authorities, it is possible that over time strategic contracts would be negotiated separately within each authority e.g. for children's and adults. This is likely to result in less market influence and a potential risk of suppliers 'playing both authorities against each other'.	
	C) Improves capacity and supports the council to withstand financial shocks	Each new authority would need to independently build and sustain specialist teams and leadership capacity. Smaller scale may reduce resilience, particularly in hard-to-recruit areas such as social care. • **Supports competitive positioning** – Each council can engage in targeted regional partnerships (e.g. East with WECA, West with Midlands Engine) to maximise sectoral strengths and funding opportunities. • **Continued opportunities to share services in a targeted way to drive efficiencies and improve outcomes -** A 2UA model can continue to build on the strong foundation of shared services and wholly owned companies in Gloucestershire already (e.g. Ubico for waste management, Publica for transactional services, One Legal, Audit and Counterfraud etc). However, this can be done in a targeted way to enable the 2UAs to operate independently where tailored approaches are required to serve their populations but come together to achieve scale where it drives more value and increases resilience / capacity e.g. continuing to operate waste collection via Ubico to reduce costs, offer improved scale and a more consistent offer to residents. • **Overall tax base similar across both UAs –** There is not likely to be significant variations in total council tax receipts between both UAs.	**A**

		• **Increased senior officer capacity** – In a 2UA model, both authorities may have to recruit for identical senior officer roles, allowing for greater capacity in senior leadership. • **Could result in a significant financial burden for the West authority –** Given the significant imbalance in demand and cost between the East and West for ASC (e.g. £405 spend per resident in East v/s £629 in West), there could be a significant risk around Ordinary Residence implications which could create a financial challenge for the West authority. • **Reduced workforce resilience -**Smaller teams are more exposed to capacity pressures and recruitment risk, especially in specialist roles. Service leads flagged risks in safeguarding, SEND, commissioning, and public health with concerns that "we'll each be half as strong". • **Limits financial flexibility in hardship** – Without pooled reserves or a shared workforce, each council would need to absorb shocks (e.g. market failure, inflation) independently which does reduce overall financial resilience for both statutory and non-statutory services. • **Additional overheads / administrative burden for shared services –** Where services are retained as shared, there is likely to be additional costs of managing governance, performance, budgetary allocations, potential disputes etc. • **Potential budget deficits for the West on day one -** Current financial analysis indicates that the East council in a 2UA scenario would be established with a day one General Fund surplus of ~ £21.9m. Whilst a West council would be established with a day one General Fund deficit of ~ £21.9m. This assumes the full delivery of unidentified savings required by all seven councils between now and Vesting Day (1 April 2028) and does not fully account for the impact of the Fair Funding Review (subject to further detail from government).	
	D) Manageable transition costs	Transitioning to two authorities would involve higher implementation costs and programme complexity compared to a single authority (currently estimated at ~ £29.0m). This means potentially	**A**

		higher legal, staffing, ICT, and governance setup costs than a single-authority model, alongside increased programme complexity and coordination risk. • **Requires two sets of transition and implementation governance** – Two constitutions, two electoral reviews, two consultations, two shadow authorities, and dual branding would be required. • **Lowered aggregation risk -** A 2UA model would require aggregation of three district-specific services into one collective service per region, resulting in reduced administrative and transitional risks for aggregated services. • **Disaggregation of systems and contracts** – High-risk, high-cost systems like Liquidlogic, Capita One, SAP, and GIS platforms would need to be split or reprocured, which are flagged as major risks and costs from discussions with service leads across ASC, ICT, and education. • **Increased implementation portfolio staffing costs -** Two separate transition and implementation portfolio teams are likely to be set up (noting close working between the two in some areas). This is likely to result in additional internal and external costs particularly in areas such as programme management, Legal and governance support, IT support etc. • **Prolonged implementation timelines -** Shadow arrangements, TUPE consultations, contract revisions, and legacy system exit timelines could vary between East and West. • **Additional ongoing costs of additional shared services arrangements** - Any new shared services arrangements (e.g. potential considerations around coroners, registrars, archives etc) would require formal governance and charging frameworks to operate across both councils which are likely to add increased ongoing running costs and effort to delivery. • **Costs to key services –** Essential services such as ASC and CSC require the appointment of statutory senior roles. These positions are mandated by law and therefore represent unavoidable costs that will be incurred by both councils.	

3. High quality, sustainable services	A) Improves local government and service delivery, avoiding unnecessary service fragmentation	The 2UA model would require the disaggregation of services that are currently delivered at county scale. This may increase the risk of fragmentation and inconsistency, especially where delivery depends on cross-county governance or shared systems. Delivery challenges have also been noted by stakeholders from the VCFSE sector particularly given increased duplication, fragmented commissioning, and reduced ability to coordinate delivery at scale. • **Aligns delivery to distinct area profiles** – East could design services around its rural access needs, building on the Cotswolds' established community transport networks and the Tewkesbury Garden Communities. West could integrate regeneration and safeguarding priorities for Gloucester and the Forest of Dean. • **Strengthens local partnerships** – Smaller geographies make it easier to work intensively with anchor institutions such as the University of Gloucestershire in the West and RAU (Royal Agricultural University) Cirencester in the East, embedding them into local economic and education strategies • **Potential disruption to countywide transformation pipelines** – Significant multi-year transformation and digital programmes, largely at county level, already underway would likely need to be paused and rescoped for each authority – This could slow down improvements to service delivery. • **Requires disaggregation of critical countywide services** – ASC, CSC, education, SEND, public health, emergency planning, transport would each need to be split out in a 2UA scenario (or at a minimum with some form of shared arrangements in place to enable delivery across two sovereign organisations). Given the statutory responsibilities associated with these services and the legislative requirements and governance, it is most likely services would need to be fully disaggregated to maintain clarity in accountability and enable long-term service stability. While this is possible, it is noted it will be extremely complex for example issues regarding ordinary residence (i.e. who pays for the cost of delivery) in social care as well as the disparity of need across the two unitary authorities.	**A**

		• **Requires the creation of a standalone Fire and Rescue Authority -** Under the provisions in the Fire and Rescue Services Act 2004, fire and rescue will need to move to non-local authority governance, financial and service arrangement (i.e. the creation of an independent Fire and Rescue Authority), which will incur additional costs and may increase risk to sustainable service provision. • **Reduces potential operational flexibility for transport and highways services** - Operational flexibility may be reduced if contractors are restricted to specific UA boundaries, limiting the ability to respond efficiently to local issues. • **Introduces governance complexity** – Safeguarding, Legal, and Commissioning leads confirmed that multi-agency boards would need to be split or restructured, adding complexity to ICB engagement and joint delivery with NHS and Police. • **Could lead to variation** – Differences in resources, priorities or capacity could lead to divergence in how services are delivered across the two areas with residents close to boundaries experiencing variations in provision. • **Disaggregation introduces risk of fragmentation** – Education, ASC and public health services warned that users moving between East and West may face different systems, policies, and access routes. • **Challenges for cross-border services** – School trusts, Multi-Academy Trusts (MATs), and regional partnerships may have to deal with two education strategies, SEND policies, and admissions frameworks, which was flagged by GAPH and FE as significant risks to consistency and collaboration. • **Place-based delivery becomes harder to coordinate** – With two sovereign councils, divergence in how neighbourhood models are resourced and prioritised becomes more likely. • **Lack of a unified capital programme** - Service leads across strategic finance, ASC, and planning emphasised the importance of a unified capital programme that allows resources to flow toward the county's most deprived areas, including Gloucester, Cheltenham, and the Forest, without needing to negotiate priorities between councils.	

		• **Examples of inter-authority collaboration** - Gloucestershire already operates several shared service models, including Ubico, One Legal, Publica, and shared audit arrangements. These demonstrate that inter-authority collaboration is possible and has worked successfully in Gloucestershire. *However, it is important to note that professional service leads emphasised that disaggregating countywide statutory functions such as ASC, CSC, and public health would be significantly more complex than these current arrangements given the significant cost, legal and care implications associated with them.*	
	B) Opportunity for public service reform including where this will lead to improved value for money	Each new authority would be responsible for designing and funding its own service transformation agenda. While local flexibility may increase, fragmentation of platforms and investment plans may limit the pace and scale of change. • **Enables local flexibility** – each council can shape its own digital investment, reform priorities, and neighbourhood model in line with community needs and political ambition, alongside being agile and flexible enough to implement • **Focused investment in area-specific reforms** – The East could prioritise digital health outreach and rural connectivity upgrades, and the West could channel regeneration funds into brownfield redevelopment and city-centre renewal in Gloucester, as identified in local growth plans. • **Reduces scale for innovation** – Smaller transformation budgets and teams may limit ability to adopt digital and analytics tools at pace. • **Increases technology fragmentation** – Without aligned procurement, the two authorities may implement incompatible systems (e.g. finance, social care case management, HR), reducing future interoperability and driving long-term inefficiency.	**A**

		• **Undermines shared learning and replication** – Innovation tested in one council may not scale to the other, limiting transferability of successful models and requiring duplicated discovery work and investment.	
	C) Improves delivery of, or mitigates risk to negative impact on crucial services	Separate authorities could create inconsistency in design and delivery of crucial services. • **Risk to homelessness prevention** – Housing and homelessness services flagged that disaggregating commissioning and housing capital programmes could make it harder to manage countywide pressures, especially with differing homelessness rates in both regions (0.21% in the West and 0.11% in the East) • **Public safety governance** – Disaggregating safeguarding structures would require new MASA boards and potentially separate Police partnership frameworks. Senior Police stakeholders stressed that this could weaken consistency of response in child protection and community safety. • **Disrupts end-to-end service planning** – Care pathways, school placement systems, early help, and transition into adult services are all currently managed across one system, and disaggregation would complicate coordination and risk continuity. In addition to this, splitting services like admissions, EHCPs and SEND into East/West would create division over time and risk undermining delivery. • **Disruption to hospital discharge and integrated care pathways** - This is an area of concern for service professionals, particularly as Gloucestershire Royal Hospital, located in the West, serves as the county's central acute site. The countywide discharge-to-assess (D2A) model, which provides short-term bedded care for assessment (Pathway 2), often leads to placements that become individuals' long-term homes. Introducing a requirement to source placements based on the boundaries of two separate unitary authorities, depending on ordinary residence, could reduce placement options and delay discharge processes.	**A**

		• **Ordinary residence implications for ASC -** The challenge around 'Ordinary Residence' is not only operationally / financially complex but impacts the most vulnerable residents if there are implications in terms of moving people across the county specifically those with long-standing placements. • **May increase outcome variation** – Differing financial starting points, access to reserves, and workforce size could affect ability to maintain parity of service quality. In addition to this, divergent policies on exclusions, admissions, and SEND support could result in inequity between areas. • **Inequitable access for vulnerable residents** - Splitting education commissioning and admissions could lead to inequitable access to the county's 14 specialist schools, especially for children with rare needs. • **Disruption to home to school transport (HTST)** - due to disaggregated placement decisions and geography, particularly availability of drivers, fleet, and routes to special schools. • **Requires robust governance and assurance** – Without shared framework; monitoring, escalation, and intervention pathways may vary - which service leads warned could expose gaps in statutory performance (e.g. SEND timeliness, EHCP outcomes). • **Creates complexity for regional partners** – Public health, education, and safeguarding professionals expressed concern about splitting countywide responsibilities and the need to co-manage performance across two legal bodies. • **Increase in out of county placements** – The creation of 2UAs would create an additional border for the county and result in working an 'out of county' services model, for services which sit within the same postcode.	
4. Meets local needs	A) Meets local needs and is	The 2UA model aims to reflect established localities, with an East/West split broadly aligned to existing district boundaries. This may support a stronger sense of local identity and enable more	**A**

	informed by local views	localised leadership and governance. However, some stakeholders raised concerns that splitting into two authorities would risk 'fragmenting already fragile cross-county partnerships' and pull focus away from place-wide strategies for education, health, and climate. • **Localities do not always follow district lines** - Some communities span the proposed boundary or rely on countywide services and networks. The 2UA model risks weakening connections between these areas. Alongside this, Education, safeguarding and housing teams noted that many communities rely on shared infrastructure and networks. A 2UA model risks creating artificial barriers around lived geography. • **Supported by some local voices –** Stakeholders in Cheltenham and some parish councils suggested that smaller units may improve visibility and local responsiveness. • **Risk of undermining cross-county place design** – The Place Model assumes consistent Neighbourhood Partnerships and locality governance. Splitting delivery governance may result in inconsistent coverage or investment. • **Some community feedback highlighted risks around marginalising communities** – The Diocese and parts of the VCFSE sector expressed concern that splitting Gloucestershire would further marginalise communities already on the edge, especially in rural transition zones like the Severn Vale and North Cotswolds. • **Some resident feedback highlighted concerns around creating a divide** - Concerns were consistently noted by some residents (who responded to a survey issued out by all Gloucestershire councils in July 2025) around fairness, division, and efficiency – with particular references to "creating a rich side and a poor side of the county".	
	B) Improves / mitigates risk to issues of local identity, cultural	The 2UA model allows each new council to retain visible place identity, which may strengthen civic pride. It supports branding and ceremonial continuity, but only if local governance and engagement are properly resourced and consistent.	**A**

	and historic importance	• **Aligns to known geographies** – District geographies in the East and West already support local branding, parish engagement, and heritage-based governance. • **Reflects distinct demographic and community profiles** – EQIA work suggests the East UA combines a more diverse urban centre (Cheltenham) with older rural areas (Cotswold, Tewkesbury), while the West UA combines Gloucester's higher ethnic diversity with older rural communities (Forest of Dean, parts of Stroud). This supports locally tailored equalities frameworks across both UAs. • **Enables place-led branding** – East could emphasise its international tourism offer around the Cotswolds, Regency Cheltenham, and cultural festivals; West could promote the Forest of Dean's green heritage and industrial legacy and Gloucester's historic docklands regeneration as part of its identity. • **May enhance local connection** – Smaller organisations may allow residents to feel more seen, particularly in distinct areas like the Forest, Cotswolds, and Stroud Valleys. • **Strengthens local heritage partnerships** – Smaller authorities could work more intensively with heritage bodies, e.g. Gloucester Cathedral Chapter in the West and Cotswold Conservation Board in the East, to protect and showcase local assets. • **Not a guarantee of civic strength** – As several service leads noted, "having smaller boundaries doesn't automatically deliver stronger community governance." Success depends on local design and sustained political investment. • **Civic identity retained** – Town and parish councils, mayoralties, and ceremonial roles would remain in place. For Gloucester a parish (city council) would be created, and for Cheltenham, options would be considered for parishing unparished areas of the town. These new parishes would serve to strengthen the identity and significant cultural and historic value of each city/town within Gloucestershire • **Supports continuity of place names** - Councils can adopt names, branding, and narratives rooted in local geography and history.	

		• **Inconsistent rollout of locality models** – Without a shared vision or resourcing strategy, Neighbourhood Partnerships and area boards may develop unevenly between the two councils, risking postcode variation in access to voice and influence. • **Risk from divergence in civic promotion -** Without coordinated messaging, the two councils could present different external identities for Gloucestershire, weakening the countywide brand. • **Heavy focus on the two urban centres** - Findings from local engagement with residents in July 2025 highlighted that it could be difficult to create local identities for each unitary that do not revolve around the largest towns which would exclude other areas.	
	C) Addresses local concerns	The 2UA model could also increase inconsistency in service design and delivery unless shared frameworks are agreed. • **Enables localised service design -** West Gloucestershire could focus on tackling urban deprivation and higher ASC/CSC demand, drawing on targeted regeneration in Gloucester and the Forest of Dean. The East could prioritise rural access needs, while maximising the economic impact of Cheltenham's Golden Valley Development and related secure tech sector, alongside the Cotswolds' tourism and agri-tech industries • **Magnifies financial and capacity disparities** – Demographic and Economic data shows that the West has higher ASC costs, higher household benefits claimant rates, higher homelessness, lower income, and higher deprivation. This may create potential challenges for the West Authority in terms of financial resilience and the ability to meet local needs effectively. • **Opportunities for joint working will remain across the 2UAs** – Employment zones, housing markets, transport corridors, and flood risk do not respect the East-West divide. For example, major commuting flows link Cheltenham, Gloucester, and Tewkesbury across the	**A**

		proposed boundary; the Golden Valley tech corridor and proposed Severn Edge energy project both require countywide planning to maximise investment potential.	
5. Supports devolution arrangements	A) Helps to support devolution arrangements / unlock devolution	In a 2UA structure, each new council would be the accountable body for its own area so there would not be a single Gloucestershire voice in national negotiations for devolution. • **Scope for tailored devolution asks** – Two councils could negotiate complementary but distinct devolution priorities, enabling the East to focus on innovation and cyber skills linked to The Innovation Village at Royal Agricultural University Development, while the West prioritises clean energy investment and infrastructure for the Berkeley Site. • **Potential to broaden regional alliances** – East could strengthen alignment with WECA and Oxfordshire for tech and high-value manufacturing; West could align with Worcestershire/Herefordshire or the West Midlands to secure agri-tech, tourism, and industrial regeneration funding. • **Could increase coordination demands** – The two councils may need to join up on priorities, funding bids, and delivery models for housing, transport, skills, and climate programmes to drive increased influence and negotiating power. • **Adds negotiation complexity** – Government may seek assurance that the two councils can act with unity on countywide matters. Stakeholder feedback from FE colleges and the VCFSE sector emphasised that clarity of leadership is essential to secure confidence from Whitehall. • **Risks divergence in place vision** – Without a shared countywide strategy, the two councils could set different priorities for Neighbourhood Partnerships, local regeneration, and climate action, weakening a consistent Gloucestershire offer in negotiations. • **Feedback from Economic Development and Planning**: Service leaders in economic development and planning warned that without joint frameworks for infrastructure, skills, and housing, the county's competitive edge could be diluted in a crowded regional market.	**A**

		• **May require dual representation** – Combined Authorities like WECA or Oxfordshire may need to engage with two Gloucestershire councils, complicating governance and coordination. • **Place delivery risks** – Without countywide oversight, devolved funding for Neighbourhood Partnerships could be designed and resourced differently between East and West, creating variation in local empowerment models.	
	B) Sensible population size ratios between local authorities and any strategic authority	Under a 2UA model, Gloucestershire would be split into two councils, East and West, with populations of ~310,000 and ~349,000. There is a chance that each of the two UAs may join a different strategic authority if there is political divergence which has implications for scale and coherence. • **Still meets 1.5m minimum if coordinate groupings** – If both councils join different groupings (e.g. East joins WECA; West aligns with West Midlands), the full benefits of scale could be lost, and we could fall short of the minimum thresholds, but if they coordinate with each other then the minimum thresholds can be met • **Worcestershire and Herefordshire group** - Two smaller Gloucestershire authorities would cause concerns around meeting the minimum 1.5m benchmark in all potential combined authority scenarios e.g. Herefordshire and Worcestershire have a combined population of c.806,000 so if only of the one Gloucestershire authorities was to form a combined authority with these two areas, this would fall short of the minimum 1.5 million threshold (at a max, it would be c.1.2m). • **Flexibility in regional partnerships** – By joining different Combined Authorities, each council could target the most relevant funding streams and policy platforms for its local economy, increasing the total range of investment opportunities for Gloucestershire. • **More comparable relative size with partner authorities -** In terms of relative size of two smaller Gloucestershire authorities compared with potential partners, this may be more	G

		palatable. The populations of c.300,000-350,000 for Gloucestershire would not be significantly higher than potential partners particularly in the case of a WECA option.	
6. Local engagement and empowerment	A) Enables stronger community engagement	By reducing the size of each council to ~310k (East) and ~349k (West), the 2UA model could allow councillors and officers to work more closely with their local communities. Some stakeholders believe this scale feels more approachable than a single countywide body. However, the quality of engagement would depend on how each council designs, resources, and sustains its locality governance model. • **Smaller footprint may improve visibility** – Members and officers could be more locally embedded, with shorter travel distances and potentially closer relationships to communities. • **Allows more localised decision-making** – Committee structures and warding arrangements can be designed to reflect local culture, population density, and settlement patterns in each area. • **Service leads stressed importance of design** – ASC, CSC, and housing officers emphasised that engagement structures need dedicated staffing, budget, and authority to work effectively, with size alone not guaranteeing impact. • **Improved councillor–resident connection** – Smaller populations and geographies make it easier for members to be directly accessible, as already seen in district-level ward surgeries in Stroud, Cotswold, and Cheltenham. • **Potential to embed local culture in governance** – Allows warding and committee structures to reflect distinctive settlement patterns, e.g. rural parish clusters in the Cotswolds or ward-based representation in Gloucester. • **Risk of inconsistency** – Each authority may take a different approach to engagement, leading to uneven governance strength across the county.	G

		• **Maintaining partner coherence is harder** – VCFSE and parish representatives warned that cross-county organisations may face duplication in engagement, consultation, and partnership work.	
	B) Delivers genuine opportunities for neighbourhood empowerment	Each authority would be responsible for designing and maintaining its own locality governance offer in a way that aligns with its geography, culture, and service profile. This could create opportunities for innovation but risks fragmentation if frameworks are not aligned. There is strong support around an emphasis on neighbourhood-level engagement and the creation of place-based structures that reflect where people live. Feedback suggested that two smaller councils might 'create stronger local ties,' but this would depend heavily on capacity and willingness to devolve power within each. • **Allows place-based design** – Each council could shape governance in dialogue with parish and town councils, community groups, and residents to reflect local traditions and priorities. • **May reflect civic identity more closely** – The West could prioritise structures for strong rural parish engagement in the Forest and Stroud Valleys, while the East could focus on urban–rural connectivity in Cheltenham, Tewkesbury, and the Cotswolds. • **Scope to pilot local decision-making** – Smaller councils could trial devolved budgets for specific localities, mirroring models in Buckinghamshire and Dorset, but adapted to Gloucestershire contexts. • **Encourages innovation in community partnerships** – Each authority could adapt the Neighbourhood Partnership principles to local capacity and needs, enabling diversity in engagement while keeping community leadership central. • **Risk of fragmentation in place delivery** – The Place Model envisions consistent Neighbourhood Partnerships across Gloucestershire. Under 2UA, these could evolve differently in each council, leading to unequal investment or capability.	G

		• **Risk of duplication or gaps** – Where partnerships (e.g. safeguarding boards, housing associations, climate forums) span the East–West boundary, separate locality models could create administrative complexity and reduce efficiency. • **Risk of democratic deficit** – By removing layers of government, some residents may feel as though the unitary is far removed from their local issues which can decrease engagement.	
7. Environmental and climate protection	A) Ensures the new authority/authorities have clear capabilities to deliver existing and future climate and nature plans.	The 2UA model could potentially mean splitting existing specialist teams, strategies, and funding streams, creating a higher risk of inconsistency and duplication. • **Could still retain strategic Climate Leadership Gloucestershire –** This already operates across seven councils currently and could continue to provide an overarching collaboration mechanism between the two UAs to strategically coordinate some activities where scale offers improved outcomes / efficiencies. • **Requires duplication of plans and delivery** – Each council may produce separate climate and nature plans, scrutiny arrangements, and reporting cycles, increasing administrative cost. • **Risks weaker investment leverage -** Countywide funding bids (e.g. for nature recovery, flood defence, EV charging infrastructure) may lose scale and competitiveness if submitted separately. • **Feedback from Flood Risk and Planning leads** – Officers stressed that some climate and flood issues are inherently cross-boundary and require shared governance to avoid duplication or gaps. • **Neighbourhood Partnerships could diverge** – Without a shared approach, local environmental action plans could vary in scope, resourcing, and ambition between East and West.	G

	B) Reflects local priorities in areas with sensitive landscapes (e.g. Forest of Dean, Cotswolds AONB).	The 2UA model is still likely to require cross-boundary coordination for shared natural systems. • **Aligns to clear geographic distinctions** – East: Cotswolds AONB, river catchments, rural agricultural land; West: Forest of Dean, Severn Estuary, urban-rural interface. • **Still requires joint governance for shared assets** – River catchments, wildlife corridors, and flood plains cross the proposed boundary would need shared planning and investment to remain effective. • **Service leads warned of coordination risk** – Planning and environmental health officers flagged that without aligned design codes and infrastructure plans, developers and land managers could face conflicting requirements in different parts of the county.	G
	C) Builds on existing commitments (e.g. "Fairer Greener Forest", Climate Emergency responses).	Each authority would be able to maintain and expand current district-led climate commitments, but with differing capacities and investment potential depending on their starting points. • **Allows continuity of local plans** – Existing commitments like “Fairer Greener Forest,” Stroud’s climate strategy, and Cheltenham’s climate targets could be retained and developed. • **Maintains political accountability** – Climate and environmental decisions would remain close to elected members and communities, which some stakeholders believe would encourage stronger local ownership. • **Requires alignment where appropriate** – Shared goals such as emissions reduction, transport decarbonisation, and biodiversity corridors would still need coordinated policy to prevent gaps or duplication. This is particularly relevant to countywide assets like the proposed Severn Edge project, which spans clean hydrogen, nuclear, and synthetic aviation fuel production, and contributes directly to Gloucestershire’s net zero targets. This is	G

		something that could be coordinated by a strategic countywide forum (building on the existing Climate Leadership Gloucestershire principles).	
8. Civic engagement and participative democracy	A) Promotes civic engagement and strengthens participative democracy.	Both authorities would be able to develop civic engagement strategies suited to their geographies and communities. The smaller scale may enable closer relationships between councils and residents, but investment and commitment will vary depending on resources and leadership. • **May feel more accessible to residents** - Councils serving 310k–350k residents may be seen as more approachable, with shorter decision chains and closer member–resident relationships. • **Risk of unequal investment** - Financial or political priorities may lead to different levels of civic participation infrastructure. • **Requires long-term commitment** - Strong participative democracy relies on consistent leadership and culture, not just structural change. • **Risk of democratic deficit -** Given LGR will reduce the number of elected councillors and create larger electoral divisions, this will increase the number of residents each councillor represents. This could risk a democratic deficit.	**A**
9. Inclusive growth and equity	A) Ability to tackle disparities in wealth setting up one unitary authority or two unitary authorities.	The 2UA model would allow each council to focus on its own economic geography and priorities, which may improve local targeting of interventions. However, without a shared tax base or pooled reserves, there is no direct mechanism to redistribute resources between East and West, meaning inequalities may persist or grow over time without intervention.	**A**

		• **Greater ability to focus on local economic drivers** – East could align its growth strategy to maximise Cheltenham's festival economy, and Cotswolds tourism; West could drive regeneration of Gloucester's city centre redevelopment, and Forest of Dean industrial renewal. • **Limits redistribution capacity** – Income and demand would need to be managed independently, reducing ability to manage known variations and inequalities across the East and West. • **Service leads voiced concern** – Finance, ASC, and CSC officers warned that over time, the West could face greater difficulty sustaining service quality and investment without a countywide balancing mechanism. Demographic projections show the West has higher deprivation levels and demand pressures. This has implications for long-term financial sustainability, preventative care, and integration with NHS partners. • **Neighbourhood regeneration may diverge** – The Place Model's ambition for consistent Neighbourhood Partnerships could be undermined if each council invests at different levels in deprived areas. • **Risk of splitting resources** - EQIA analysis shows that economic challenges are different in each part of the county and can affect groups protected under equalities law. In the West, young people face higher unemployment. In the East, there is less access to apprenticeships and training, which can particularly impact young people and disabled residents. A 2UA model could target these local issues more directly, but splitting resources may make it harder to run countywide programmes to reduce these gaps.	
	B) Prioritises vulnerable residents and community-level regeneration.	The scale of need, particularly in the West, may place more pressure on local finances and delivery unless partnership structures or funding mechanisms are established. There is a risk that different parts of Gloucestershire could become aligned to different combined authorities fragmenting influence and complicating engagement with regional priorities.	G

		• **Closer integration with local VCFSE networks** – Smaller councils could embed local community organisations (e.g. GL Communities in the West, Cotswold Friends in the East) directly into regeneration planning, improving reach and trust • **Exposes resource gaps** – The West's higher need may not be matched by local income, making it harder to fund regeneration and preventative work without external support. • **Requires robust local commissioning** – Each council would need strong capability to identify, fund, and measure interventions, which was a challenge raised in ASC and housing disaggregation discussions with service professionals, where market capacity varies significantly between East and West.	
	C) Ensures that financial sustainability is not achieved at the expense of service levels.	With two independent MTFSs, each council would control its financial decisions, giving flexibility to align budgets with local priorities. However, without shared reserves or risk pooling, cost pressures in high-demand services could lead to service reduction, particularly in the West. • **Enables local control over budgets** – Each authority can shape its own financial strategy to align with its values and priorities. • **Enables targeted financial planning** – East could direct reserves toward rural health access; West could prioritise safeguarding and early intervention in high-need urban areas. • **Potential to attract different funding streams** – Separate authorities could pursue distinct grant opportunities, widening the overall pool of external investment brought into Gloucestershire. • **Increases pressure on high-cost services** – The West, with higher ASC and CSC spend per resident, may face difficult decisions if cost pressures outpace funding. • **Creates risk of service variation** – One council may be able to protect frontline services more easily than the other.	**A**

		• **Could require trade-offs** – Without pooled reserves or cross-council subsidy, service levels may be more exposed to short-medium- and long-term budget constraints. • **High Needs funding uncertainty** – Stakeholders raised concerns about how Gloucestershire's current countywide High Needs deficit would be apportioned fairly, warning that uneven settlement could undermine education support in one area. • **Countywide Dedicated Schools Grant (DSG) deficit projected to reach ~£234m by vesting day (1 April 2028).** If statutory override is not maintained or an alternative solution implemented, then both a 1UA and 2UA would face significant financial risks. • **Impact of the Fair Funding Review -** This also remains unknown at this time presenting further financial uncertainty to both 1UA and 2UA scenarios.	

Appendix 6: Proposed Service Delivery Models

Scope of services considered

Corporate services

- Digital & ICT
- Asset Management & Property
- Strategic Finance
- Pension Fund
- Insurance & Counter Fraud
- HR
- Transactional Services incl. Payroll, AP / AR
- Legal Services (Incl. One Legal)
- Democratic Services & Elections
- Communications
- Transformation
- Planning, Performance & Insight (Data)
- Information Governance
- Customer Management

Front-line upper tier services (only county council services currently)

- Public Health
- Adult Social Care
- Children's & Education
- Transport & Highways
- Archives
- Fire & Rescue
- Trading Standards
- Coroners
- Libraries
- Registrars
- Employment and Skills

Front-line lower tier services OR both (only districts OR both county and districts currently)

- Public Protection
- Emergency Planning
- Revenue & Benefits
- Housing Strategy, Maintenance & Homelessness
- Leisure & Culture
- Economy & Sustainability (incl. Tourism & Visitor Economy)
- Planning & Building Control
- Development & Regeneration
- Waste & Environmental Services
- Parking
- Cemetery and Crematoria

Defining the key parameters used

	High	Medium	Low
Change Required - Transformation or alignment needed to realise the benefit.	**Fundamental redesign of team structure, roles, and processes; introduction of new systems or services; significant cultural change.**	**Moderate restructuring, role changes, or process improvements; some new tools or systems introduced.**	**Minor adjustments to workflows or responsibilities; no structural or system-wide changes.**
One - off Costs - The upfront investment required to implement the change	**Over £1,000,000 – Includes major IT systems, infrastructure, consultancy, or large-scale training programmes.**	**£500,000–£1,000,000 – Includes moderate system upgrades, recruitment drives, or targeted training.**	**Under £500,000 – Includes minor equipment, short-term consultancy, or small-scale training.**
Recurring Cost - Ongoing annual expenses to maintain or operate the new arrangement.	**Over £500,000 annually – Ongoing staffing, licensing, or service delivery costs.**	**£250,000–£500,000 annually – Include staffing, subscriptions, or maintenance.**	**Under £250,000 annually – Minimal ongoing costs such as software licences or admin support.**
Aggregation Benefits - The benefits of aggregating services based on both financial and non financial benefits	**Strong efficiencies and strategic gains from combining services; consistent delivery and reduced duplication.**	**Some coordination and savings achieved, but benefits are limited**	**Minimal improvement realised through aggregation**

Corporate Services

Corporate Services | Summary (1 of 3)

			1UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Digital & ICT**	Different delivery models across the Councils. County / Tewkesbury / Glos City / Stroud - In-House Cotswold / Forest of Dean / Chelt - Publica	**In-house digital service within the new unitary council** *(Noting that some specialist functions e.g. cyber security, hardware and software, may still be outsourced).*	**High**	**High**	**N/A**	**High**
Joint Officers meeting	**Asset Management & Property**	**All councils currently deliver property and asset services largely in-house.** *However, there are external consultants and framework partners utilised for specialist services by councils.* *Note services previously delivered by Publica were brought in house with the exception of one health and safety advisor.*	**Hybrid:** The new unitary council retains strategic and compliance functions in-house with external framework consultants for specialist skills e.g. valuations. Note: This excludes commercial property	**High**	**Medium**	**N/A**	**High**
County Council Officer meeting	**Pensions**	**Operated and administered in-house via the Gloucestershire Pension Fund within GCC for all councils in Glos**	**Remains operated in-house in the new UA** The new unitary council takes on the role of the administering authority via the Gloucestershire Pension Fund	**Low**	**Low**	**N/A**	**Low**
No discussions so far	**Strategic Finance**	**In House**	**Single in-house team**				
No discussions so far	**Insurance & Counterfraud** ***CFEU*** ***ARA*** ***SWAP – South West Audit Partnership***		**Single in- house team** with traded services Note: bring corporate fraud together				

Corporate Services | Summary (2 of 3)

			1UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers Template	**Democratic Services**	**In-House across all councils**	**Single in-house function** with local delivery teams. Also combined Democratic services and elections teams into one team.	**Low**	**Low**	**N/A**	**High**
	Elections	**In-House across all councils**	**Single in-house function** with local delivery teams. Also combined Democratic services and elections teams into one team.	**Low**	**Low**	**N/A**	**High**
No discussions so far	**Legal Services** **Incl. One Legal**	**Mixed –** One Legal between 4 councils, quasi shared service between 2 councils and in-house for county	*One Legal service in house with traded services*				
No discussions so far	**Comms**	**In house**	**Single in-house team**				
No discussions so far	**HR**		**Single in-house team**				
No discussions so far	**Transactional Services incl. Payroll, AP / AR**		**Single in-house team with traded services**				

Corporate Services | Summary (3 of 3)

			1UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
No discussions so far	**Planning, Performance & Insight (Data)**	**In house**	**Single in-house team**				
No discussions so far	**Information Governance**	**In house**	**Single in-house team**				
No discussions so far	**Transformation**	**In house**	**Single in-house team**				
No discussions so far	**Customer Management**	In house	**Single in-house team**				
No discussions so far	**Internal audit**	**Tewkesbury** – In-House **Cheltenham, Cotswold and Forest of Dean** – South West Audit Partnership (SWAP) **Gloucestershire County** – In-house service which is also provided to Gloucester City Council and Stroud.	**Delivery model to be determined following an options analysis of the different options.**				

Front-line upper tier services

Front-Line Upper Tier Services | Summary (1 of 2)

			1UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Public Health**	**In-House management & advisory with a range of commissioned services**	**In-House management & advisory with a range of commissioned services**	**Low**	**Low**	**N/A**	**Medium**
Joint Officers meeting	**Adult Social Care**	ASC is **delivered in-house by GCC**, and the care market is managed centrally, with countywide contracts and provider relationships	**A single in-house ASC service** under the new unitary authority, retaining the current DASS structure and statutory responsibilities, with all delivery, commissioning, and safeguarding functions managed centrally and delivered locally	**Low**	**Low**	**N/A**	**Medium**
Joint Officers meeting	**Childrens**	**Mixed Delivery Models** The service is managed overall in-house but there are also a number of elements of the service commissioned out e.g. Family and Youth Hub development	**Overall Children's Services are managed in house** but continue to commission specific areas as needed	**Low**	**Low**	**N/A**	**Medium**
	Education	**In-house** *Note: Cross-authority music service*	**A single in-house education service** retained within the new unitary authority	**Low**	**Low**	**N/A**	**Medium**

Front-Line Upper Tier Services | Summary (2 of 2)

			1UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
County Council Officer meeting	**Archives**	**In-house**	**Remains In - house**	**Low**	**Low**	**N/A**	**N/A**
Joint Officers meeting	**Transport & Highways**	**In-House** With outsourced service delivery	In-House with outsourced delivery	**Low**	**Low**	**N/A**	**Low**
County Council Officer meeting	**Fire & Rescue**	**In-House -** GCC currently holds the governance and service responsibilities.	**Remains In-House -** Supported by Unitary Council (not a county council)	**Low**	**Low**	**N/A**	**N/A**
County Council Officer meeting	**Trading Standards**	**In-House**	**Remains In-House -** Supported by Unitary Council (not a county council)	**Low**	**Low**	**N/A**	**N/A**
County Council Officer meeting	**Coroners**	**In-House**	**Remains In-House**	**Low**	**Low**	**N/A**	**N/A**
County Council Officer meeting	**Libraries**	**In-House**	**Remains In-House**	**Low**	**Low**	**N/A**	**Low**
County Council Officer meeting	**Registrars**	**In-House**	**Remains In-House**	**Low**	**Low**	**N/A**	**N/A**
County Council Officer meeting	**Employment and Skills**	**In-House**	**A single in-house Employment and Skills team is established within the new unitary council**	**Low**	**Low**	**N/A**	**N/A**

Front-line lower tier services OR both (only districts OR both county and districts currently)

Front-Line Lower Tier Services | Summary (1 of 4)

			1UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Public Protection**	**Mixed.** Most services are delivered in-house by district councils though Publica provides services for Forest of Dean and Cotswold with some local differences. There are also some services (in some councils) contracted out e.g. stray dogs, contaminated land.	**Single In-House Countywide Service** (Noting that some specialist or very low volume functions e.g. stray dogs may still be outsourced).	**High**	**Medium**	**N/A**	**High**
Discussed under Public Protection	**Emergency Planning** *Discussed briefly under Public Protection but was not a detailed discussion – Ratings therefore may need to be refined*	**In-House across all councils currently**	**Single in-house team**	**Low**	**Low**	**N/A**	**Low**
Joint Officers meeting	**Revenue & Benefits**	**In-House** Cotswold and FoD via Publica	**Single In-House Countywide Service** Unlikely to be in place for day 1 but this would be the longer-term aspiration.	**High**	**High**	**N/A**	**High**
Joint Officers Template	**Cemetery and Crematoria**	**In – House** across all 7 councils	**Single in-house delivery team**	**Medium**	**Medium**	**N/A**	**Medium**
Joint Officers meeting	**Housing Strategy, Maintenance & Homelessness**	Mixed - All councils have some elements in-house but note: Stroud and Chelt have in-house DLOs and their own housing stock. FoD and Cotswold have shared housing staff in Publica (shared with West Oxfordshire too) Glos City host the Strategic Housing Partnership which is countywide across all 7 councils. All councils commission some services externally	**Hybrid Model –** Merge 2 HRA's, have a single head, delivery by east and west teams.	**High**	**High**	N/A	**High**

Front-Line Lower Tier Services | Summary (2 of 4)

			1UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Economy & Sustainability -** *Climate & Sustainability*	In-House teams in each council but there is also a county-wide Climate Leadership Gloucestershire Team managed by Glos City. o be updated on 31.07.25	**In-House Strategic Climate Function** *with local delivery of specific projects as required*	**High**	**Medium**	N/A	**Medium**
Joint Officers meeting	**Economy & Sustainability -** *Economic Development*	All councils have in-house ED capabilities noting variations in terms of scope of services, structures and extent of partnership working	**Single Strategic Economic Development Function with Local Delivery Presence**	**High**	**Medium**	N/A	**High**
Joint Officers meeting	**Economy & Sustainability -** *Tourism & Visitor Economy*	All Councils have small in-house local tourism teams but they are all also part of (and put varying amounts of funding towards) the Cotswolds Plus Local Visitor Economy Partnership (LVEP).	**Single Visitor Economy Function with Local Place Marketing** *Not yet been determined if the strategic element would be in-house or as a separate organisation*	**Low**	**Low**	**N/A**	**High**
Joint Officers meeting	**Leisure**	Stroud - **In-House model** **5 of the 6 councils outsource provision** *(3 to Freedom Leisure; CBC to the Chelt Trust and Tewkesbury to Places Leisure)*	**Harmonisation of current contractual positions over time to move to a sustainable and aligned model**	**High**	**Medium**	**N/A**	**Medium**
Joint Officers meeting	**Culture & Heritage**	**Mixed** A number of councils have this in-house; Cotswold outsource running of museum to Freedom Leisure; A lot of partnership working e.g. Glos City have a strategic partnership with Gloucester Culture Trust	**Codesigned future delivery models with the sector and communities with a consideration of future implications related to devolution**	TBD based on delivery models that are chosen	TBD based on delivery models that are chosen	TBD based on delivery models that are chosen	TBD based on delivery models that are chosen

Front-Line Lower Tier Services | Summary (3 of 4)

			1UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Planning & Building Control**	**Planning:** In-house	**Single in-house planning service with central strategic functions and area-based DM teams for local planning permission.**	**High**	**Medium**	**N/A**	**High**
		Building Control: **Mixed -** Some in-house and some with shared arrangements e.g. - Gloucester City and Stroud partnership / Cheltenham and Tewkesbury	**Single in-house countywide service with local delivery teams and central coordination for compliance.**	**Medium**	**Medium**	**N/A**	**High**
Joint Officers meeting	**Development & Regeneration**	In house	**Single in-house team**	**Medium**	**Medium**	**N/A**	**High**
Joint Officers Template	**Parking**	**Mixed.** Most services are delivered in-house by district councils though Publica provides services for Forest of Dean and Cotswold with some local differences. . All enforcement activities at GCC are outsourced	**Mixed:** In-house management and notice processing. Outsourced physical enforcement. Consolidate charging policies including EV charging	**High**	**Medium**	**N/A**	**High**

Front-Line Lower Tier Services | Summary (4 of 4)

			1UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Waste & Environmental Services (Incl. Ubico)**	**Waste Disposal and HRCs: Mixed Delivery -** Through in house teams and contractors such as Ubico and FCC (Javelin Park)	**Disposal**: In-House Strategic Service, and Disposal Authority Role for the new UA **HRCs:** Ubico continue to manage HRC Operations	**Low**	**Low**	**N/A**	**High**
		Waste Collection: Delivered via Ubico	**Remains delivered by Ubico**	**Low**	**Low**	**N/A**	**Low –** *Consistency and standardisation*
		Environmental Services - Mixed Delivery - in house team with some elements contracted out, some delivered by Ubico e.g. tree planting	**Single in house team**	**Medium**	**Medium**	**N/A**	**High**

Appendix 7: Equalities Impact Assessment (1UA)

The Equality Act 2010 introduced the Public Sector Equality Duty which states that a public authority must, in the exercise of its functions, have due regard to the need to:

1. Eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

This document demonstrates how the Council is meeting the Public Sector Equality Duty by setting out the findings of an equality analysis that has been undertaken in relation to a proposed change to assess whether it has a disproportionate impact on people who share a protected characteristic. The Council's Equality Impact Assessment (EqIA) process covers additional groups not 'protected' by section149 of the Equality Act 2010, including care leavers and care experienced adults.

Background

Title of the proposed change being assessed i.e. the policy, service or other development	Local Government Reorganisation

Describe the purpose of the proposed change and the intended outcomes
This Equalities Impact Assessment (EqIA) has been developed to support the consideration of proposals to restructure local government in Gloucestershire, assessing both the single unitary authority (1UA) and two unitary authorities (East / West) (2UA) options. This document focuses on the 1UA option only, the proposed makeup of which would comprise the whole of Gloucestershire and is based on the footprint of Gloucestershire County Council:

Table 8: Structure and 2023 Population of Option 1[65]

Gloucestershire Option	
Cheltenham	120,255
Cotswold	91,490
Forest of Dean	89,104
Gloucester	134,991
Stroud	124,540

[6565] Mid 2023 Population Estimates, ONS

Tewkesbury	98,896
Gloucestershire Total	659,276

The purpose of this assessment is to understand and evaluate the potential impacts of these changes on all service users and council staff with protected characteristics.

The reorganisation of local government is a significant change that could affect how services are delivered, how decisions are made, and how residents engage with their local councils.

This assessment aims to:

- Identify any potential positive or negative impacts on service users with protected characteristics
- Consider how these impacts might differ between the one-unitary and two-unitary models
- Highlight opportunities to promote equality and mitigate any adverse effects

It is intended for this EqIA to be a live document, updated as proposals are refined and further engagement with stakeholders takes place. Additionally, after a decision has been made by Government on the chosen model for Gloucestershire, to inform implementation.

Who is affected by the proposals?	
Service users:	Yes
Wider community:	Yes
Workforce:	Yes
Other (please specify):	

Decision to be taken and decision maker	The decision under consideration is whether the local government structure in Gloucestershire is replaced by either: • A single unitary authority; or • Two unitary authorities (East / West) This decision will significantly impact how local services are delivered, how residents engage with local government, and how resources are allocated across the county. Although the ultimate decision will be made by Government, councils in Gloucestershire are able

	to make a local decision on their preferred model to present to Government.

Information and Data Collection

Summarise how you have collected the information and data required to assess the current situation (section 3.1 below) and the potential or actual impact of the proposed change (section 3.2 below) on those who share the protected characteristics and the additional groups (e.g. survey of services users, running community focus groups, analysing service usage data, engaging with staff networks). The actual information and data should be set out in Appendix 1 (Service Users) and Appendix 2 (district & county staff in Gloucestershire).

If there are any gaps, include an action in section 4 to fill these. This does not mean that you cannot complete the equality impact assessment, but you need to follow-up the action and revisit as part of the monitoring and review arrangements set out in section 5.

Stakeholders	Engagement and Consultation	Other Sources
Service Users / Wider Community	Workshops with services across the county council and district councils to understand the risks and opportunities associated with aggregation and disaggregation of each service. A public local engagement process has also been undertaken across Gloucestershire, designed and delivered by an independent, external engagement company - Cratus. The engagement process includes an online survey with both structured and open-ended questions, a dedicated microsite, 12 in-person events (two per district), and two online webinars. A total of 3,112 survey responses were received.	Outputs of disaggregation / aggregation service workshops. Cratus engagement report.

Workforce	A workforce pulse survey has been undertaken across all councils. Top line outputs from the survey are: • 86% of staff understand what LGR might mean in Gloucestershire • 82% of staff understand what devolution might mean for Gloucestershire • 63% understand the difference between LGR and devolution • 75% of staff think messages are being well communicated • Email and staff briefings are the most popular ways staff like to hear messages about LGR/devo • 46% of staff don't feel confident their views will be listened to • 78% feel confident to ask questions • 69% have felt no impact on morale • 78% feel supported by leadership and management • 90% feel they can discuss with their line manager	Staff engagement outputs from the pulse survey on LGR and Devolution across the seven councils in Gloucestershire
Partners	To support the wider local engagement being delivered across Gloucestershire to inform the development of LGR proposals, Gloucestershire County Council's (GCC) senior leadership conducted meetings with key stakeholders, with whom they had	LGR Stakeholder Engagement report

	established relationships, across June – August 2025. The meetings addressed the following, with some stakeholders choosing to provide further feedback via email or letter: • Update stakeholders on how LGR Full Proposals and Devolution discussions are progressing in Gloucestershire. • Update stakeholders on the LGR policy position of GCC's new Cabinet to be agnostic and evidence-led in considering both a one unitary and two unitary model. • Provide information on the timetable and key processes underway. • Understand more about how LGR / Devolution could impact specific stakeholders / organisations, what is important to them in relation to this topic and address any concerns or issues for them. • Gauge interest in further collaboration and engagement (as appropriate). Stakeholders engaged includes: • Various members of the business community • Gloucestershire Society of Local Council Clerks (SLCC) • Gloucestershire VCSE Alliance	

	• Gloucestershire Rural Community Council (GRCC) • The Bishop of Gloucester, joined by senior Clergy including Deans of the Diocese. • Gloucestershire's schools associations • Gloucestershire College • Hartpury University • National Star College • SG & Stroud College • Bromford Housing • Adults Collaborative Board • Gloucestershire Care Providers Association	
Other		

Equality Assessment

Indicate the impact on each group and explain how you have reached your conclusions (i.e. through analysis of the information and data that was collected through the engagement, consultation and other sources / methods that were set out in section 2).

Consider sub-categories (e.g. different kinds of disabilities) and how the groups are interconnected (e.g. young women) resulting in particular needs or types of disadvantage and discrimination (sometimes known as intersectional or combined discrimination).

The Proposed Change

Summarise your assessment of the likely or actual impact of the proposed change on each of the groups. If an action is required, this should be recorded in Section 4.

Service Users						
Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
Age				X	Gloucestershire has an ageing population. Demographics are projecting a dependency ratio of 0.69 by 2047. An increase from 0.65 in 2022. Under a 1UA arrangement the impact on demands to council services would remain unchanged. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y
Detailed summary of Impact	Potential disproportionate impact: • There is potential for impact to services, dependant on the ways of working and delivery model that is agreed under the new authority. Further analysis is needed once delivery model is agreed to review					

	impacts to services such as: SEND, early years, education, children's specialist placements, some public health services, e.g. public health nursing, sexual health Potential positive proportionate impact • Potential for positive impacts on early help services (though greater in 1UA than 2UA) as separated functions would be brought together in a unitary arrangement. • Under 1UA, working as clusters under a locality model would bring benefits to schools and bring potential benefits to service users by an improved service delivery. • Planning implications for new schools could improve under 1UA option. Where these decisions are currently taken in district councils, meaning that decisions should be made collaboratively for the county to ensure new schools are developed in the best location depending on the needs of the local geographical area. Therefore, bringing a positive impact to groups of school age.					
Disability				X	There are potential opportunities for improvements when services are aggregated under a 1UA. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y
Sex				X	There are potential opportunities for improvements when services are aggregated under a 1UA. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y
Race				X	There are potential opportunities for improvements when services are aggregated under a 1UA.	Y

					Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	
Gender reassignment				X	There are potential opportunities for improvements when services are aggregated under a 1UA. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y
Pregnancy & maternity				X	There are potential opportunities for improvements when services are aggregated under a 1UA. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y
Religion and/or belief				X	There are potential opportunities for improvements when services are aggregated under a 1UA. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y

Sexual orientation				X	There are potential opportunities for improvements when services are aggregated under a 1UA. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y
Marriage & civil partnership				X	There are potential opportunities for improvements when services are aggregated under a 1UA. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y
Armed Forces community				X	There are potential opportunities for improvements when services are aggregated under a 1UA. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y
Carers				X	Parent-carer forums and networks are already established as county-wide. There are potential opportunities for improvements when services are aggregated under a 1UA.	Y

					Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	
Care leavers / care experienced adults	X				It is considered that would be a positive impact under a 1UA model where it is thought that there is scope for enhanced working relationships with key partners, therefore positively impacting service users. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users and workforce.	Y
Detailed Summary of Impact	• Under a 1UA arrangement there is more potential for improved relationships, working practices and processes for those teams who provide accommodation and support for care leavers and care experienced adults					
Digital exclusion				X	There are potential opportunities for improvements when services are aggregated under a 1UA. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users and workforce.	Y
Geography, for example, urban and rural areas		X			There is potential for a balanced / neutral impact under a 1UA model, with mitigants needing to be considered for the potential negative impacts.	Y

					Where the disproportionate impacts can be mitigated through an appropriate delivery model, such as a locality model. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users and workforce.	

Potential disproportionate impact:

- There is concern that local representation, location of service delivery, and local knowledge could be lost. However. as part of implementation planning, further analysis will be undertaken to ensure appropriate mitigants are considered. For example: planning, delivery of adult social care services, licensing decisions etc.

Potential positive proportionate impact:

- It is likely that there will be minimum risk to service continuity and provision in this option. This in turn means that there is potentially a lower risk of disruption or significant changes in access or provision for the most vulnerable residents across Gloucestershire.
- Commissioning services on a countywide footprint (under 1UA) with additional locality provision aligned with population needs, is more likely to create the economies of scale required to maintain breadth of service delivery across urban and rural areas and avoid differential access or provision.
- Under the existing two-tier structure, services can be concentrated on the county's urban centres, with a lack of knowledge about practicalities and difficulties of delivery in more rural and isolated communities, who have more limited access to services. A 1UA or 2UA arrangement will provide opportunity for shared knowledge and expertise to improve service delivery and access across these communities.
- Planning implications for new schools could improve under 1UA option. Where these decisions are currently taken in district councils, meaning that decisions could be made collaboratively for the county to ensure new schools are developed in the best location depending on the needs of the local geographical area.
- A single council offers critical mass to support rural service delivery, including exploring micro-enterprises and technology-enabled care for hard-to-reach populations.

• Opportunities arising through unitarisation for integrating current functions of districts; housing, planning, environmental health with countywide public health functions to address wider determinants of population health at scale.						
Socio-economic disadvantage				X	There are potential opportunities for improvements when services are aggregated under a 1UA. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y
Vulnerable groups of society		X			There are potential opportunities for improvements when services are aggregated under a 1UA. Opportunity through 1UA to improve co-ordination of support for inclusion health groups who may touch on multiple services, notably health and housing, through the integration of district and county functions. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users.	Y

Council Workforce							
Moving to a One Unitary Authority (1UA) will bring big changes to how we work and how teams are set up. Further assessment is needed to understand how these changes will affect different groups of staff across services.							
Protected Characteristics / Additional Groups		Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
Age					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Considerations for disproportionate impacts: • As the biggest age demographic for staff falls within the 45-59 age range, consideration will need to be given to this group • When jobs are reorganised or changed, there's a risk that older people might be treated unfairly in hiring. • There's a risk that HR policies and practices might not be consistent across councils that will be making up the new authority Potential for positive impact: • As roles change and teams are reorganised, younger staff might have more opportunities for promotion.	Y

						• The new council could create policies that support staff of all ages, including training and flexible retirement options. • As implementation plans are agreed, there will be more opportunity to work with employee groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Disability					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Considerations for disproportionate impacts: • Staff with disabilities might be more affected by changes in location, especially if transport or building access isn't properly planned. • When the new council is created, there may be delays or gaps in providing workplace adjustments (like special equipment, flexible hours, or software) during team or office moves. • Changes to how people work or being moved to a new employer (TUPE) may disproportionately affect staff with mental health needs or neurodiverse conditions.	Y

						Potential for positive impact: • The new council has a chance to build accessible workplaces, systems, and flexible working options from the start. • This is an opportunity for the councils to harmonise policies and create strong inclusion policies for the new council, leading to better support and visibility for staff with hidden disabilities or mental health conditions. • As part of implementation, efforts will be made to make sure staff policies around workplace adjustments are in place and that workspaces are accessible. However, the exact impact may vary between services, and a more detailed review will be needed. • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	Page 311
Sex					X	Based on the different needs of the current workforce, below highlights some general points for consideration:	

						As with other personal characteristics, the impact of changes will vary depending on the makeup of each team. However, changes that affect frontline staff and team leaders are likely to affect women more, where they make up a large part of these roles. It will be important to consider this when planning any potential staff restructures linked to LGR. Considerations for disproportionate impacts: • There's a higher risk of women being affected unfairly, as they make up over 70% of the workforce. Consideration should be given when affecting any contractual changes to ensure individuals are not disproportionately affected due to sex. • There is a risk that new pay structures do not provide equity for those of any sex. Potential for positive impact: • The new council could use this to improve gender balance, especially in leadership, management, and technical roles. • The opportunity to ensure there is an equal pay policy and structure • As implementation plans are agreed, there will be more opportunity to work with employee groups to understand their needs.	

						• As with other areas, work will be done to make sure staff policies are consistent and further consideration will be needed as part of implementation planning. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Race					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Like with other personal characteristics, the impact of changes will vary depending on the makeup of each team or service. However, there is risk that staff from ethnic minority backgrounds are impacted: Considerations for disproportionate impacts: • Communication could be harder during the transition for staff who don't speak English as their first language. • There's a risk that anti-racism work or equality efforts might lose focus if priorities shift. Potential for positive impact: • The changes could be an opportunity to improve how staff are included and	

						supported, by reviewing engagement policies to better reflect the local community. • This is an opportunity for the councils to harmonise policies and create strong inclusion policies for the new council that improve how staff are included and supported. • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Gender reassignment					X	There is no data available on staff who declare that they are going through or have gone through gender reassignment. Consideration will be needed to ensure there are no disproportionate impacts on staff with this characteristic. Based on the different needs of the current workforce, below highlights some general points for consideration: Considerations for disproportionate impacts:	

						• There's a risk that HR policies and practices might not be consistent across councils that will be making up the new authority. For example, how names and pronouns are recorded, dress codes, or access to support. Some councils may have different policies that will need to be aligned during the TUPE process. Potential for positive impact: • Setting up the new council is a chance to improve support for trans staff. This should include better training, updated policies on gender identity, and more inclusive facilities. • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	Page 315
Pregnancy & maternity					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Considerations for disproportionate impacts: • Staff on maternity leave during the transition might feel concern about job	

						security, changes in their manager, or changes to their role. • Through this process, working hours or locations might change. This could be difficult for pregnant staff or new mothers, especially if it's different from what they agreed before going on maternity leave. • There is a risk that HR policies and practices are not consistent across councils that will be making up the new authority. There will be a need to harmonise HR policies. • As the new council is set up, there could be problems with managing leave, pay, or flexible working during the change. Potential for positive impact: • With service redesign, the new council might be able to plan their workforce in a more local and flexible way. • This could lead to better support for returning to work, more flexible working options, and improved arrangements for staff with caring responsibilities. • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs – such as physical space for breastfeeding	Page 316

						Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Religion and/or belief					X	Like with other personal characteristics, the impact will vary depending on the makeup of each team. Consideration will be needed to ensure there are no disproportionate impacts on staff with this characteristic. Based on the different needs of the current workforce, below highlights some general points for consideration: Considerations for disproportionate impacts: • There is a risk that religious needs might be missed during potential office moves or when new policies are created. For example, staff may need prayer rooms or multi-faith spaces if they're asked to work in a new location. • There is a risk that HR policies and practices are not consistent across councils that will be making up the unitary authority. There will be a need to harmonise HR policies. Potential for positive impact: • Any changes to office spaces as part of creating the new councils should be a	

						chance to design more inclusive workplaces. This might include multi-faith rooms, culturally appropriate food options, or more flexible leave policies. • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Sexual orientation					X	Like with other personal characteristics, staff don't have to share their sexual orientation, so data is limited on this characteristic. Based on the different needs of the current workforce, below highlights some general points for consideration: Considerations for disproportionate impacts: • There's a risk that existing LGBTQ+ support networks or allies could be lost if teams are split up or moved. Potential for positive impact: • The new councils should show strong support for LGBTQ+ inclusion from the start	

						by creating new networks, policies, and support systems for LGBTQ+ staff. • As implementation plans are agreed there will be more opportunity to work with employee groups, such as LGBTQ+ groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Marriage & civil partnership					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected. As with other areas, work will be done to make sure staff policies are consistent and further consideration will be needed as part of implementation planning. As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs.	

						Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Armed Forces community					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected. Considerations for disproportionate impacts: There is a risk that HR Polices and practices are not consistent across councils that will be making up the unitary authority. There will be a need to harmonise HR policies. As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	Page 320
Carers					X	Based on the different needs of the current workforce, below highlights some general points for consideration:	

						As with other personal circumstances, consideration will be needed to ensure there are no disproportionate impacts on staff with this characteristic. Including options for leave and flexible or hybrid working. Considerations for disproportionate impacts: • Staff who care for others may feel additional pressures if they're worried about job security or increased workloads. • There is potential for loss of informal support, like understanding managers or flexible arrangements, during team changes. • Moving to a new work location, if required, could mean longer travel times and higher costs, making it harder to manage their caring duties. • There is a risk that HR policies and practices are not consistent across the councils that will be making up the unitary authority. There will be a need to harmonise HR policies. Potential for positive impact: • The new council could use this opportunity to improve support for carers by creating fair and consistent policies. For example, carers' leave and flexible working, across all areas.	

						• As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Care leavers / care experienced adults					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected. As with other areas, work will be done to make sure staff policies are consistent. As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	

Digital exclusion					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected. As with other areas, work will be done to make sure staff policies are consistent. As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Geography, for example, urban and rural areas					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected.	

						As with other areas, work will be done to make sure staff policies are consistent. As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Socio-economic disadvantage					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected. Some general points for consideration are: Considerations for disproportionate impacts: • Staff on lower incomes may struggle more with potential changes if moving to a new location, longer travel, or job uncertainty. • If there are redundancies or changes in pay, those already financially stretched could be disproportionately affected. However, based on the experiences of	

						other local authorities who have already gone through this process, redundancies have been minimal and mostly limited to senior leadership roles (such as Chief Executives, Directors etc). Potential for positive impact: • The reorganisation and TUPE process should be used to reduce inequalities, for example, by improving access to training, career progression, or digital tools. • As implementation plans are agreed, there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	Page 325
Vulnerable groups of society					X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to	

						ensure people with this characteristic are not disproportionately affected. As with other areas, work will be done to make sure staff policies are consistent. As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	

Action Plan

Set out the key actions that will be undertaken, following the equality assessment in section 3, to further maximise the positive impact or mitigate the negative impact of the proposal on the protected characteristics and additional groups prior to implementation (any negative consequences should be eliminated, minimised or counter-balanced by other measures):

Identified Potential or Actual Impact	Recommended Action(s)	Owner	Target Completion Date

Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users and workforce.	As part of implementation planning, each LGR programme will need to complete an EqIA to consider the impact of proposed changes to service delivery and ways of working on those with protected characteristics and inform decision making.	Programme Managers	Nov ’25 - Aug ‘26
Depending on the implementation plan chosen, there is potential for equalities impact on workforce with protected characteristics. Mostly likely to be Geography and disability, should any change in working location be needed.	People & Culture workstream to ensure all workforce risks are mitigated against through policy.	People & Culture LGR Workstream	Nov ’25 – Apr ‘28

Monitoring and Review

Public bodies must have regard to the aims of the duty not only when a policy, service or development is being created and decided upon, but also when it is implemented and at regular intervals thereafter. The Equality Duty is a continuing duty.

Lead officer(s):	Gareth Edmundson, Chief Executive – Cheltenham Borough Council Jane Portman, Chief Executive, Cotswold District Council Nigel Brinn, Chief Executive, Forest of Dean District Council Jon McGinty, Managing Director, Gloucester City Council Jo Walker, Chief Executive – Gloucestershire County Council Kathy O’Leary, Chief Executive – Stroud District Council Alistair Cunningham, Chief Executive – Tewkesbury Borough Council

Part 1 – Initial arrangements (up to around six months following implementation)

Date of the post implementation review:	October 2028
Approach to measuring the impact of the change to enable a comparison between the anticipated impact (as set out in section 3) with the actual impact: ▪ What mechanisms will be used? ▪ How will service users / the wider community / GCC staff and other stakeholders be involved?	Review on implementation to be completed by each LGR Programme as agreed under finalised implementation plans. Each programme will need an individual EqIA to ensure there is consideration of equalities and ownership of actions throughout the process.

Part 2 – Ongoing arrangements (from around six months onwards)

Frequency of monitoring and review:	Ongoing monitoring via individual LGR programmes.
What mechanisms will be used? How will service users / the wider community / GCC staff and other stakeholders be involved?	Via individual programme EqIAs.

Appendix 1: Service User Data and Information

Details of service users affected by the proposed activity:

Groups	Service User Data and Information
Age	Dependency ratios are a measure that indicate the level of support that needs to be provided by the working age (16-64) population to the younger and older population, people aged 0-15 or 65+. A low dependency ratio indicates that there is a sufficient ratio of the working-age population to the dependent population. In contrast, a high dependency ratio indicates there may be more financial burden on the working population to support the dependent population. The West has a higher overall population than the East, it has a slightly lower proportion of those aged 65 and over, which are likely to require more targeted support. *Table 5: Age distribution of the mid 2023 Population, by the proposed unitaries*[1]

	Gloucestershire		East		West	
	Number	%	Number	%	Number	%
Total Population	659,276	100.0%	310,641	100.0%	348,635	100.0%
0-16	115,485	17.5%	53,920	17.4%	61,565	17.7%
16-64	398,322	60.4%	186,241	60.0%	212,081	60.8%
65+	145,469	22.1%	70,480	22.7%	74,989	21.5%

Table 8 shows the projected dependency in 2047. The East area is projected to have a greater dependency ratio than the West and Gloucestershire as a whole. For every 100 people the East will be supporting around 5 more dependents than the West, which could translate to higher demands on council services, and more people who are not in the workforce than those who are working, potentially constraining growth in the local economy.

Table 8: Projected dependency ratio, 2047, by the proposed unitaries[2]

	Dependency ratio
Gloucestershire	0.69
East	0.72
West	0.67

Figure 2 looks at the projected population across the three areas in more detail, breaking it down by sex and 5 year age band. Across all areas the largest 5 year cohort is those aged 55-59. All areas have a similar age profile, although the West area has a higher proportion of those aged 35-59, and a lower proportion of older people than other areas.

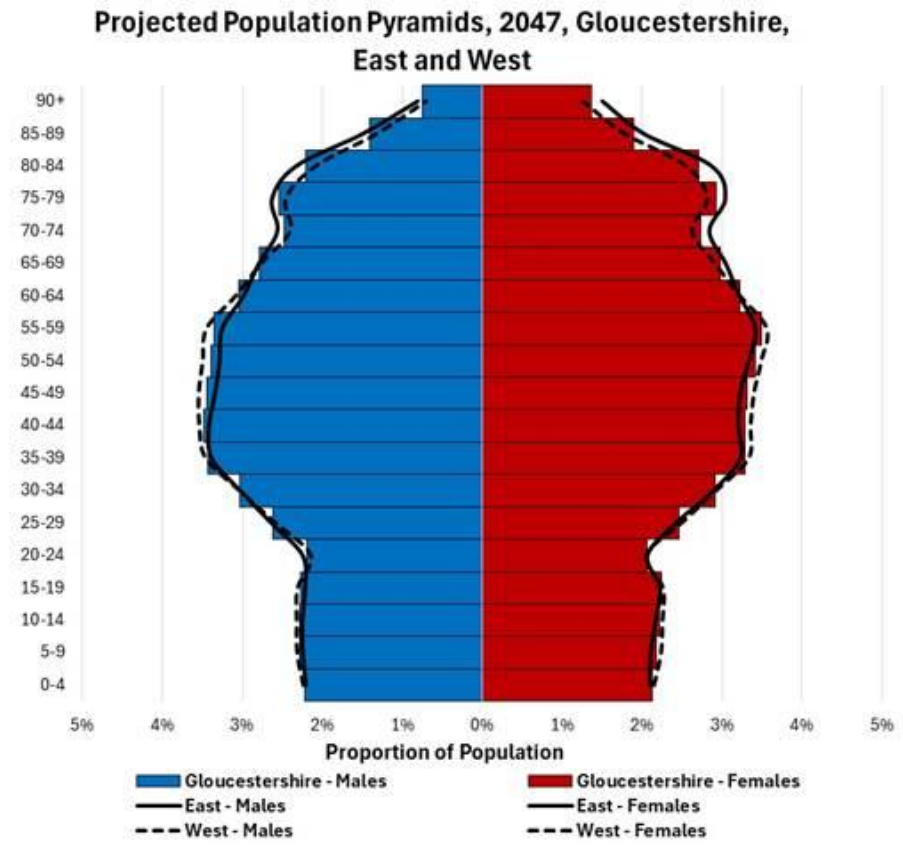


Figure 2: Projected Population Pyramids, 2047, Gloucestershire, East and West[3]

Adult Social Care

The information below shows a break down of the Adult Social Care case cohort by age groups, Gloucestershire, East and West areas and the component districts.

Table 9 shows the caseload for age groups over 75 are the highest across all areas. The West area has greater overall demand than the East.

Table 9: Adult Social Care Service Users by age, Gloucestershire, East and West, as at 31st March 2025 (DRAFT)[4] [5]

East Unitary

	Under 18	18 - 24	25 - 34	35 - 44	45 - 54	55 - 64	65 - 74	75 - 84	85+	Grand Total
Cheltenham	0	56	80	99	81	167	165	319	328	1271
Cotswold	0	16	25	22	28	69	99	217	307	770
Tewkesbury	0	40	57	44	44	119	99	203	239	836
	0	**112**	**162**	**165**	**153**	**355**	**363**	**739**	**874**	**2877**

West Unitary

	Under 18	18 - 24	25 - 34	35 - 44	45 - 54	55 - 64	65 - 74	75 - 84	85+	Grand Total
Gloucester	<5	159	190	156	179	302	220	371	333	1865
Stroud	<5	82	101	79	87	187	164	294	340	1313
Forest of Dean	0	65	87	72	73	157	156	257	278	1113
	0	**306**	**378**	**307**	**339**	**646**	**540**	**922**	**951**	**4291**

Countywide

	Under 18	18 - 24	25 - 34	35 - 44	45 - 54	55 - 64	65 - 74	75 - 84	85+	Grand Total
Cheltenham		56	80	99	81	167	165	319	328	1271

Cotswold		16	25	22	28	69	99	217	307	770
Tewkesbury		40	57	44	44	119	99	203	239	836
Gloucester	<5	159	190	156	179	302	220	371	333	1865
Stroud	<5	82	101	79	87	187	164	294	340	1313
Forest of Dean		65	87	72	73	157	156	257	278	1113
Out of County or Unknown	<5	18	24	50	54	60	42	55	49	349
Grand Total	**7**	**425**	**559**	**512**	**533**	**1042**	**939**	**1710**	**1871**	**7433**

Vulnerable Children

The information below shows a break down of the vulnerable children across Gloucestershire, East and West areas and the component districts.

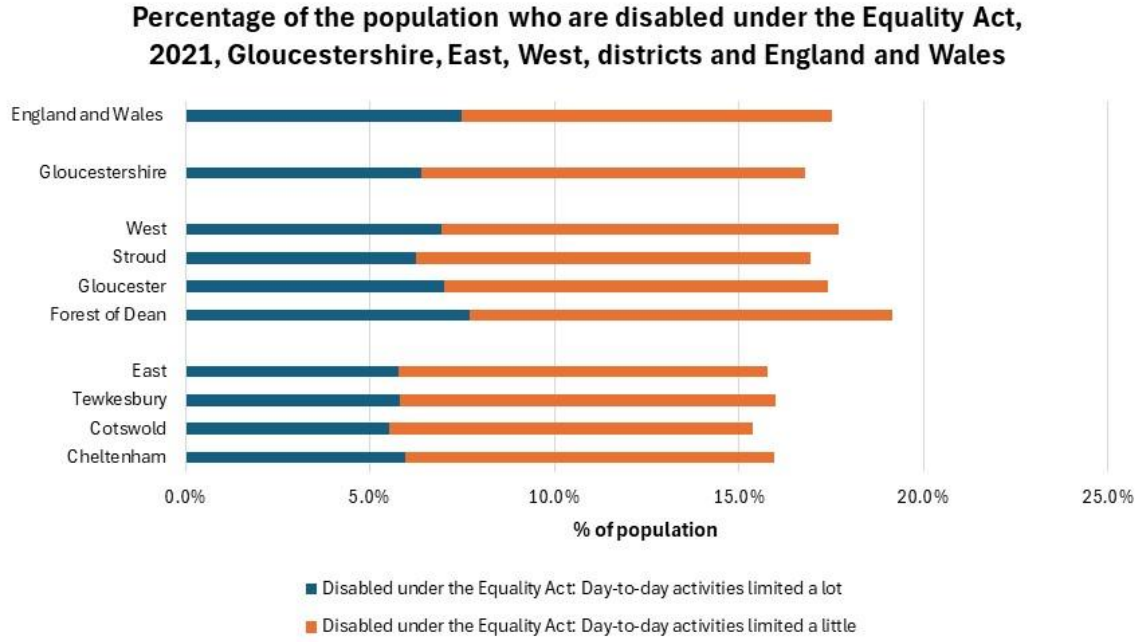
The West has a higher population of children than the East. The West also has a higher level of child safeguarding activity, and a greater rate of children subject to Education, Health and Care Plans.

Table 10: Service demand for children's services as at 09/07/2025[6]

	Population aged 17 and under (MYE 2023)	All open referrals/cases[7]		CiN / CP / CIC[8]		CYP with EHCP[9] [10]	
Area	***Number***	***Number***	***%***	***Number***	***%***	***Number***	***%***
Cheltenham	23,777	662	2.80%	333	1.40%	1,106	4.70%
Cotswolds	16,623	419	2.50%	270	1.60%	733	4.40%
Tewkesbury	20,515	575	2.80%	346	1.70%	1,235	6.00%
East	60,915	1,656	2.70%	949	1.60%	3,074	5.00%

Forest of Dean	16,192	460	2.80%	301	1.90%	867	5.40%
Gloucester	29,192	1,196	4.10%	617	2.10%	1,708	5.90%
Stroud	24,173	596	2.50%	308	1.30%	1,294	5.40%
West	69,557	2,252	3.20%	1,226	1.80%	3,869	5.60%
Gloucestershire	130,472	3,908	3.00%	2,175	1.70%	6,943	5.30%

[1] Mid 2023 Population Estimate, ONS
[2] *Ibid.*
[3] *Ibid.*
[4] DAIT, GCC
[5] The tables are based on our Client Level Dataset (CLD), representing a distinct count of individuals by age and postcode at the point of service commencement. Please be aware that the CLD is currently undergoing a comprehensive review and enhancement process, which may lead to future refinements in the data. All service types are included in this snapshot—this encompasses Health, Fully-Funded, Part-Funded, and selected Self-Funded services. No services have been excluded.
[6] DAIT, GCC
[7] Figures refer to all open Social Care referrals, as of 09/07/2025. Address information refers to Home Address as of 09/07/2025. Totals may not add up to 100% as either address information not being recorded or child residing outside of Gloucestershire at that time.
[8] Of the above children, those who were either subject to a CiN plan, CP plan or were a Child in Care, as of 09/07/2025
[9] Figures include children and young people aged 0-25 with an EHCP maintained by the LA and are a snapshot as at 09/07/2025. Based on the child / young person's home postcode.

	[10] * EHCP runs from 0 to 25, but the majority of plans are for under-18's, so the same population (0 to 17) is used for the % for consistency
Disability	In 2021, 16.8% of Gloucestershire residents were classified as having a disability under the Equality Act. Looking at the East and West areas, the West area has the highest proportion of residents with a disability (17.7%) exceeding the figure for the county as a whole and the national average. The East area has the lowest proportion of residents with a disability (15.8%) below the county and national average. 

Sex

According to the 2023 population estimates, 51.1% of Surrey's population is female. This is in line with the national average. The East and West areas are also broadly similar to the national and county average with 51.2% and 51.0% of the population being female respectively.

Table 13: Sex breakdown of the mid 2023 Population, Gloucestershire, East, West, districts and England and Wales[1]

	Number			Percentages	
	Male	Female	Total	Male	Female
Cheltenham	59,011	61,244	120,255	49.1%	50.9%
Cotswold	43,963	47,527	91,490	48.1%	51.9%
Tewkesbury	43,698	45,406	89,104	49.0%	51.0%
East	**146,672**	**154,177**	**300,849**	**48.8%**	**51.2%**
Forest of Dean	66,984	68,007	134,991	49.6%	50.4%
Gloucester	60,868	63,672	124,540	48.9%	51.1%
Stroud	47,832	51,064	98,896	48.4%	51.6%
West	**175,684**	**182,743**	**358,427**	**49.0%**	**51.0%**
Gloucestershire	**322,356**	**336,920**	**659,276**	**48.9%**	**51.1%**
England and Wales	29,835,992	31,018,735	60,854,727	49.0%	51.0%

As age increases, females outnumber males by an increasing margin. In Gloucestershire in 2023, 52.8% of people aged 65-84 were female, whilst for people aged 85+ the difference was more marked with females accounting for

	61.4% of the total population; this difference is observed across the East and West areas as well as at a national level. *Table 14: Sex and breakdown of the mid 2023 Population, Gloucestershire, East, West, districts and England and Wales*[2]

									0-15		16-64		65-84		85+	
									Male	Female	Male	Female	Male	Female	Male	Female
East	50.6%	49.4%	49.1%	50.9%	46.8%	53.2%	38.3%	61.7%								
West									50.9%	49.1%	49.7%	50.3%	47.6%	52.4%	38.8%	61.2%
Gloucestershire									50.8%	49.2%	49.4%	50.6%	47.2%	52.8%	38.6%	61.4%
England and Wales									51.2%	48.8%	49.3%	50.7%	47.1%	52.9%	38.1%	61.9%

[1] Mid 2023 Population Estimates, ONS

[2] *Ibid.*

Race	The Equality Act states that race includes colour, nationality, ethnic or national origins. The government refers to ethnicity and not race; this is because surveys usually ask people for their ethnicity and not their race, and using consistent terms helps people to understand the data. In Gloucestershire 87.7% of residents identified as White English, Welsh, Scottish, Northern Irish or British, which was considerably higher than the national average of 74.4%. The East and West have a similar proportion of

	residents who identified as White English, Welsh, Scottish, Northern Irish or British to Gloucestershire with 88.1% and 87.4% respectively. White Other accounts for the second largest proportion of residents in Gloucestershire, East and West. In Gloucestershire 5.3% of residents fall into this category, lower than the national average of 7.3%. In the East area 5.9% of residents are classified as White Other, slightly higher than the Gloucestershire figure but lower than the national figure, while in the West area 4.8% of residents fall into this category, higher than the Gloucestershire and national figure. The Asian, Asian British and Asian Welsh category made up the largest percentage of the non-White Gloucestershire, East and West population and represented 2.9% of Gloucestershire residents, lower than the national average of 9.3%. The East and West areas have a similar proportion of Asian, Asian British and Asian Welsh as Gloucestershire as 2.6% and 3.1% respectively. There are minimal differences in the proportion of Black, Black British, Black Welsh, Caribbean or African residents and Mixed or Multiple Ethnic Groups across Gloucestershire, East and West areas.

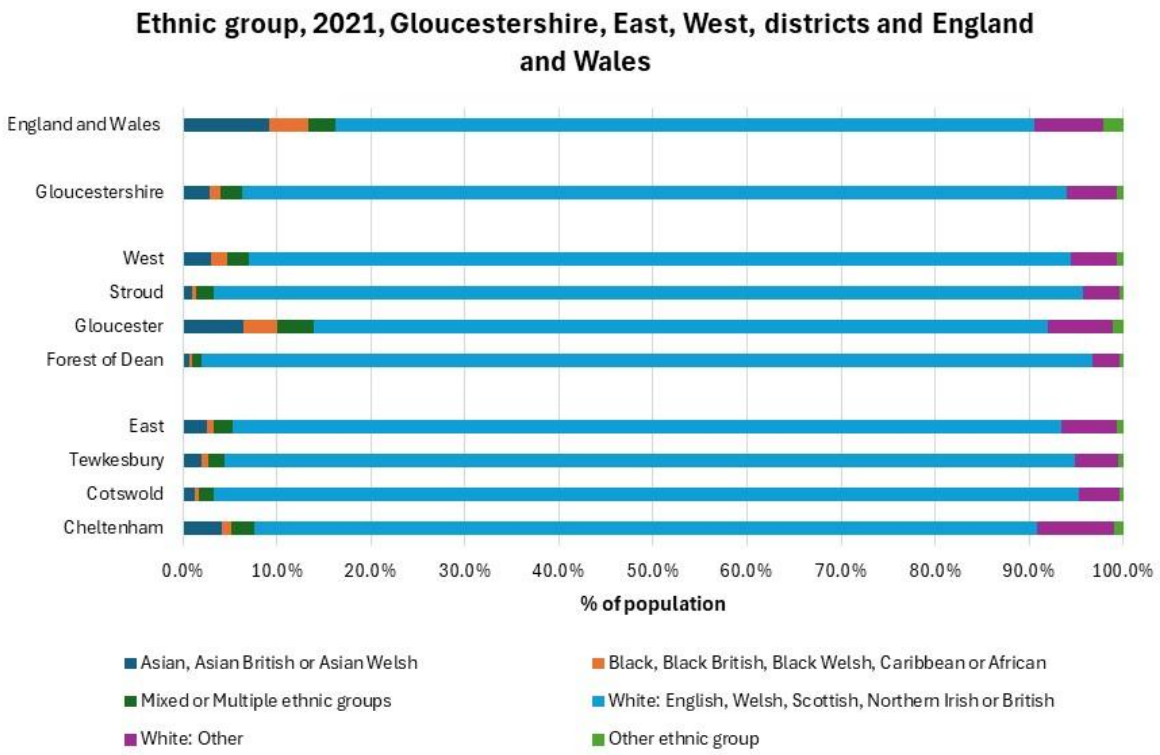
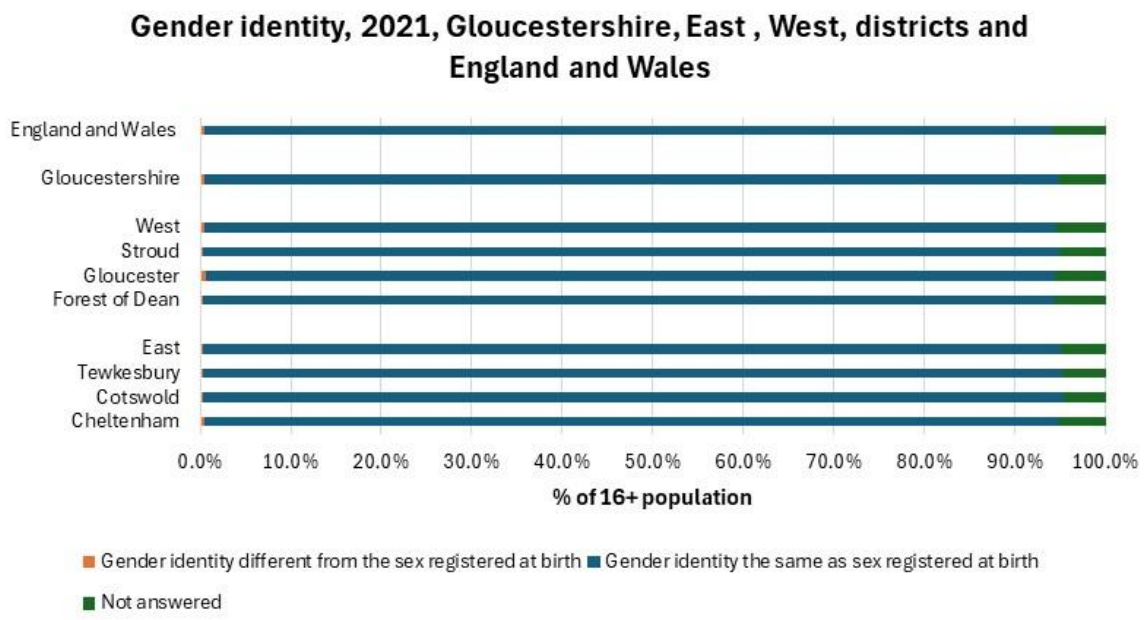


Figure 6: Ethnic group, 2021, Gloucestershire, East, West, districts and England and Wales[66]

Gender reassignment	The Census 2021 has provided the first set of official data on gender identity in England and Wales. In the 2021 Census there was a new question around gender identity, asking 'is your gender the same as the sex you were registered at birth?'. The question referred to a person's sense of their own gender. It was directed only at people

[66] 2021 Census, ONS

	aged 16 and over, and answers were voluntary. However, as of November 2024, the Census 2021 data on gender identity no longer hold the accredited official statistics designation and have been reclassified as official statistics in development. ONS states: There are some patterns in the data that are consistent with, but do not conclusively demonstrate, some respondents not interpreting the question as intended; given other sources of uncertainty, not least the impact of question non-response, we cannot say with certainty whether the census estimates are more likely to be an overestimate or an underestimate of the total number of trans people aged over 16 years in England and Wales. Census estimates on gender identity are, however, broadly consistent with the best available comparator of the GP Patient Survey and international comparators. Overall, 94.8% of residents in Gloucestershire aged 16 and over answered the question. Of these, almost 2,200 people (0.4%) regarded their gender identity to be different from the sex registered at birth. The East and West areas also saw 0.4% of their population stating their gender identity was different from the sex registered at birth. However, in the East 95.1% of residents answered the question this was slightly higher than the 94.5% in the West.

	 *Figure 7: Gender identity, 2021, Gloucestershire, East, West, districts and England and Wales*[67]
Pregnancy & maternity	There were 5,839 live births in Gloucestershire in 2023, this equates to a crude fertility rate of 8.9 live births per 1,000 people of all ages. This was lower than the national average of 9.7 live births per 1,000 people of all ages. Looking at the East and West areas, the highest crude birth rate was in the West (9.1), which exceeded the county average but was lower than the national average. The East had a crude birth rate of 8.6 live births per 1,000 people, this was lower than the county and national average. Crude birth rates are affected by the demographic

[67] *Ibid.*

make-up of an area. Gloucestershire's relatively older population means it has proportionally less women of childbearing age than England, which may explain its lower crude birth rate.

Table 9: Crude birth rates, 2023[68]

	Live births	Total Population	Crude Birth Rate per 1,000 population
Cheltenham	1,009	120,255	8.4
Cotswold	657	91,490	7.2
Tewkesbury	1,001	98,896	10.1
East	**2,667**	**310,641**	**8.6**
Forest of Dean	709	89,104	8.0
Gloucester	1,448	134,991	10.7
Stroud	1,015	124,540	8.1
West	**3,172**	**348,635**	**9.1**
Gloucestershire	**5,839**	**659,276**	**8.9**
England and Wales	591,072	60,854,727	9.7

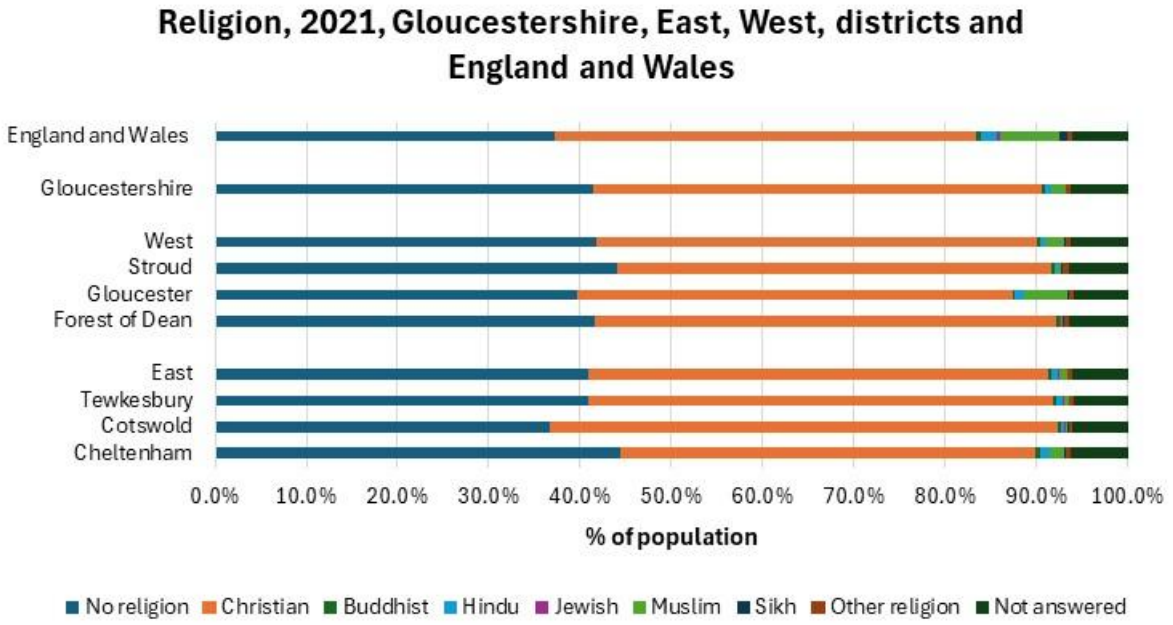
The limitation of crude birth rates is that it doesn't account for the age and sex structure of the population. General Fertility Rates account for this by expressing live births per 1,000 females aged 15-64, this adjusts for women of childbearing age in an area. A higher general fertility rate (GFR) means that, on average, more children are being born to women of reproductive age. The General Fertility Rate in Gloucestershire stands at 50.4 live births per

[68] Live births in England and Wales, ONS

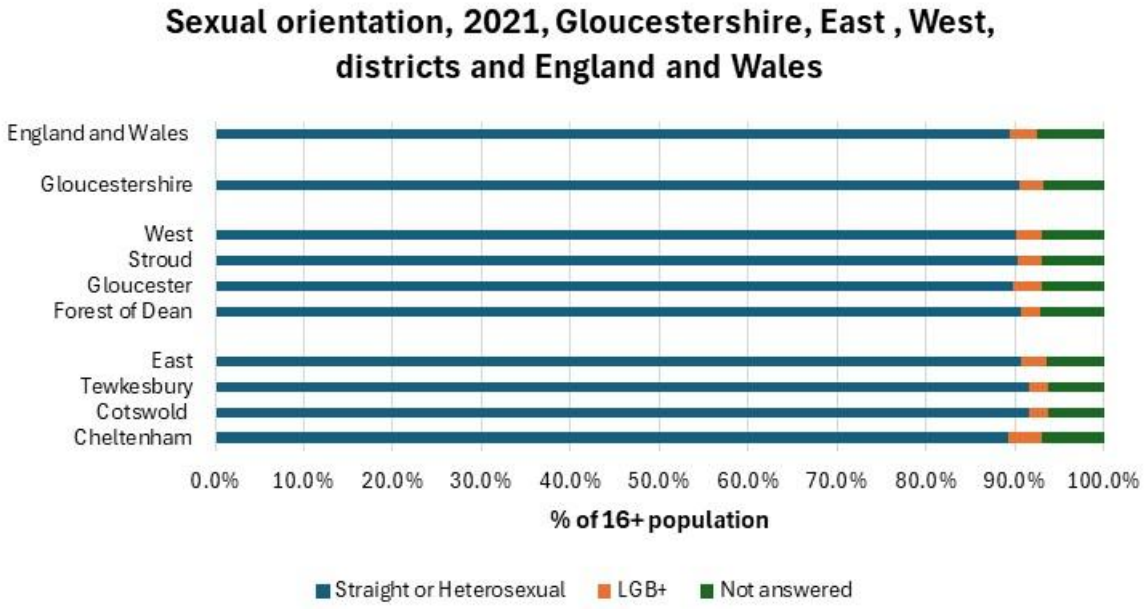
<table>
<tr>
<td></td>
<td>1,000 females aged 15-44, which is slightly higher than the national average. Looking at the East and West areas, the highest general fertility rate was in the West (51.9), which exceeded the county average but was lower than the national average. The East had a general fertility rate of 48.8 live births per 1,000 females aged 15-44, this was lower than the county and national average.
Table 10: General Fertility Rates, 2023[69]
<table>
<tr><th></th><th>Live births</th><th>15-44 year old female population</th><th>General Fertility Rate per 1,000 population</th></tr>
<tr><td>Cheltenham</td><td>1,009</td><td>23,432</td><td>43.1</td></tr>
<tr><td>Cotswold</td><td>657</td><td>13,724</td><td>47.9</td></tr>
<tr><td>Tewkesbury</td><td>1,001</td><td>17,525</td><td>57.1</td></tr>
<tr><td>East</td><td>2,667</td><td>54,681</td><td>48.8</td></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td>Forest of Dean</td><td>709</td><td>14,206</td><td>49.9</td></tr>
<tr><td>Gloucester</td><td>1,448</td><td>26,915</td><td>53.8</td></tr>
<tr><td>Stroud</td><td>1,015</td><td>19,969</td><td>50.8</td></tr>
<tr><td>West</td><td>3,172</td><td>61,090</td><td>51.9</td></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td>Gloucestershire</td><td>5,839</td><td>115,771</td><td>50.4</td></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td>England and Wales</td><td>591,072</td><td>11,879,690</td><td>49.8</td></tr>
</table>
</td>
</tr>
<tr>
<td>Religion and/or belief</td>
<td>The 2021 Census asked about religion, but this question was voluntary and ‘no religion’ was a common answer, a proportion of people also chose not to answer the question.</td>
</tr>
</table>

[69] Live births in England and Wales, ONS

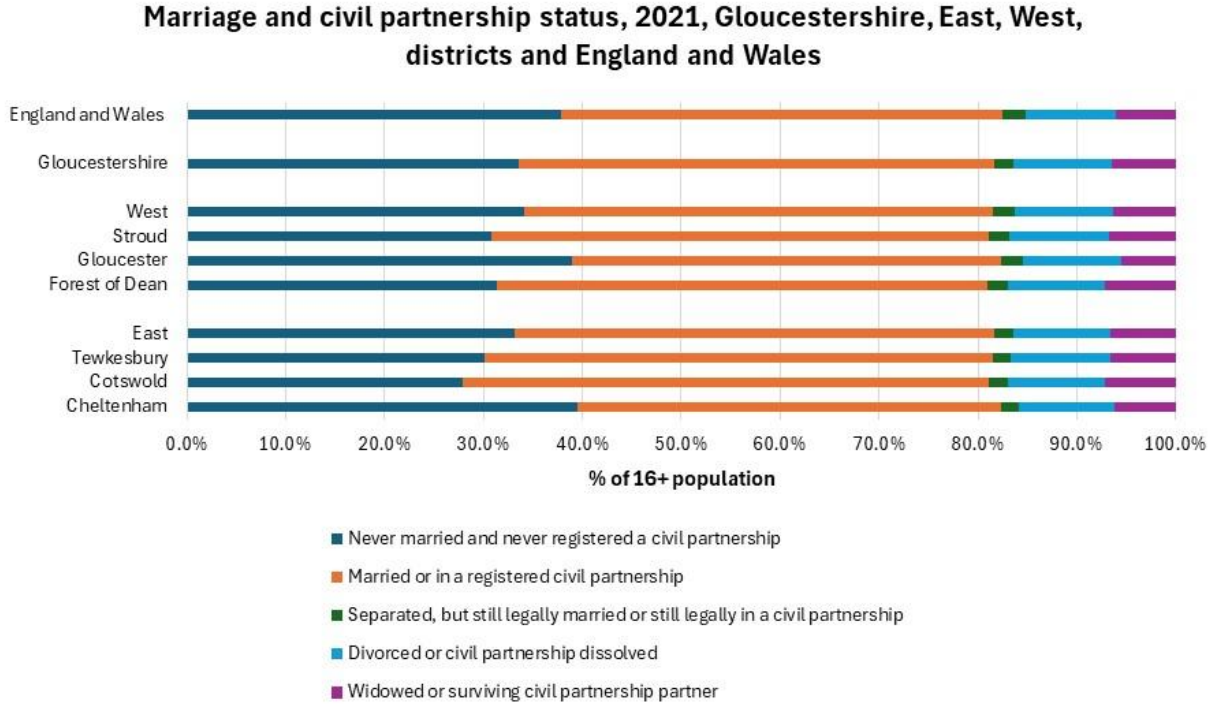
	According to the 2021 Census, 49.2% of residents in Gloucestershire were Christian, making it the most common religion, the proportion of residents selecting this religion was higher than the national average (46.2%). The East and West have a broadly similar proportion of residents who identified as Christian to Gloucestershire with figures of 50.2% and 48.3% respectively. No religion accounts for the second largest proportion of residents in Gloucestershire, East and West. In Gloucestershire 41.4% of residents fall into this category, higher than the national average of 37.2%. In the East area 41.0% of residents are classified as having no religion, slightly lower than the Gloucestershire figure but higher than the national figure, while in the West area 41.7% of residents fall into this category, higher than the Gloucestershire and national figure. Islam was the second most common religion in Gloucestershire, East and West Areas, Muslims represented 1.4% of Gloucestershire residents considerably below the national average of 6.5%. In the East area 0.8% of residents are classified as Muslim, slightly lower than the Gloucestershire figure and considerably lower than the national figure, while in the West area 2.0% of residents fall into this category, higher than the Gloucestershire figure but lower than the national figure.

	 *Figure 8: Religion, 2021, Gloucestershire, East, West, districts and England and Wales*[70]
Sexual orientation	As with gender identity, the Census 2021 has provided the first set of official data on sexual orientation in England and Wales. In the 2021 Census there was a new question around sexual orientation, asking 'which of the following best describes your sexual orientation?', and providing a list of options. It was directed only at people aged 16 and over, and answers were voluntary. Overall, 93.2% of residents in Gloucestershire aged 16 and over answered the question. The majority of people who answered described their sexual orientation as 'straight or heterosexual', at 90.4% of the population. This is slightly higher than the national average of 89.4%. In the East area 90.6% of

[70] *Ibid.*

	residents described their sexual orientation as 'straight or heterosexual', marginally higher than the county average and the figure for the West (90.2%).  *Figure 9: Sexual orientation, 2021, Gloucestershire, East, West, districts and England and Wales*[71]
Marriage & civil partnership	*Figure 10* shows the breakdown of the 16+ population by marriage and civil partnership status. There are minimal differences between Gloucestershire, the East and West areas. The East area has a slightly lower proportion of people who have never married and never registered a civil partnership (33.1%) than the West (34.1%) with the county sitting in the middle of the two areas (33.6%). Conversely the West area has a slightly lower proportion of

[71] *Ibid.*

	people who have married or are in a registered civil partnership (47.5%) than the East (48.6%) with the county again sitting in the middle (48.0%).  *Figure 10: Marriage and civil partnership status, 2021, Gloucestershire, East, West, districts and England and Wales*[72]
Armed Forces community	Local authorities, national government, businesses, local authorities, charities and the public have committed to support the Armed Forces community through the Armed Forces Covenant. It was adopted in 2011 and articulated

[72] *Ibid.*

the principles of no disadvantage and special consideration; that no current or former member of the armed forces, or their families, should be at a disadvantage compared to other residents in the provision of public and commercial services. This was followed by the Armed Forces Act 2021 introduced a new requirement for some public bodies, including the NHS and local authorities, to pay due regard to the principles of the Covenant when carrying out specific public functions in the areas of housing, healthcare and education.

The information captured relates to armed forces veterans rather than current personnel and was captured by the 2021 Census. In 2021 there were there 27,418 people who had previously served in the UK armed forces resident in Gloucestershire. This equates to 5.2% of the 16+ population. The proportion of armed forces veterans was higher in Gloucestershire than it was across England and Wales (3.8%). The East has a slightly higher proportion of armed forces veterans (5.4%) than the West (4.9%) and the county as a whole, but the difference is minimal.

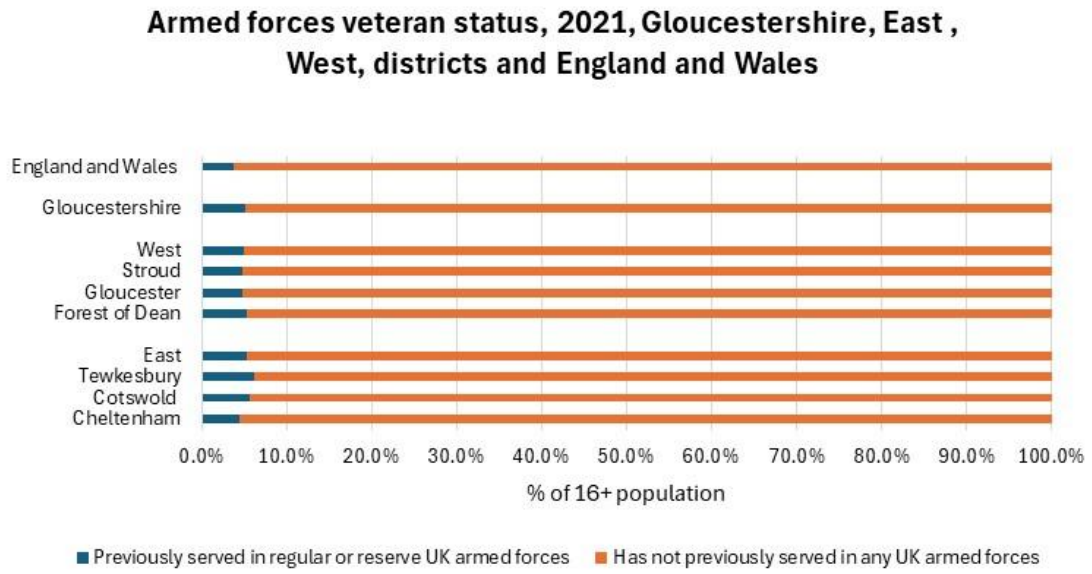


Figure 11: Armed Forces Veteran Status, 2021, Gloucestershire, East, West, districts and England and Wales[73]

Carers

This information is based on self-reported caring status according to the 2021 Census, this means figures will be different from sources which look at registered carers.

In 2021, there were 51,862 people aged 5+ providing unpaid care in Gloucestershire, this is equivalent to 8.5% of the population. In comparison, a slightly higher proportion of the population in England and Wales (8.9%) said they provided unpaid care. In the East area 8.0% of residents aged 5+ provided unpaid care higher slightly higher than the county average and the figure of 8.9% seen when looking at the West area. There are minimal differences observed in the levels of care provided by the East, West and Gloucestershire total.

Table 11: Residents aged 5+ by caring status, 2021, Gloucestershire, East, West, districts and England and Wales[74]

	Percentage of 5 + Population				
	Provides no unpaid care	**Proved some unpaid care**	**Provides 19 hours or less unpaid care a week**	**Provides 20 to 49 hours unpaid care a week**	**Provides 50 or more hours unpaid care a week**
Cheltenham	92.6%	7.4%	4.2%	1.3%	1.9%
Cotswold	91.9%	8.1%	4.7%	1.2%	2.2%
Tewkesbury	91.5%	8.5%	4.7%	1.4%	2.4%
East	**92.0%**	**8.0%**	**4.5%**	**1.3%**	**2.1%**
Forest of Dean	90.3%	9.7%	5.1%	1.7%	2.9%
Gloucester	91.6%	8.4%	4.2%	1.8%	2.4%
Stroud	91.1%	8.9%	5.3%	1.4%	2.2%

[73] 2021 Census, ONS
[74] *Ibid.*

West	**91.1%**	**8.9%**	**4.8%**	**1.7%**	**2.4%**
Gloucestershire	**91.5%**	**8.5%**	**4.7%**	**1.5%**	**2.3%**
England and Wales	**91.1%**	**8.9%**	**4.3%**	**1.8%**	**2.7%**

Care leavers / care experienced adults

This information is based on self-reported caring status according to the 2021 Census, this means figures will be different from sources which look at registered carers.

In 2021, there were 51,862 people aged 5+ providing unpaid care in Gloucestershire, this is equivalent to 8.5% of the population. In comparison, a slightly higher proportion of the population in England and Wales (8.9%) said they provided unpaid care. In the East area 8.0% of residents aged 5+ provided

unpaid care higher slightly higher than the county average and the figure of 8.9% seen when looking at the West area. There are minimal differences observed in the levels of care provided by the East, West and Gloucestershire total.

Percentage of 5 + Population Provides no unpaid care Proved some unpaid care Provides 19 hours or less unpaid care a week Provides 20 to 49 hours unpaid care a week Provides 50 or more hours unpaid care a week

	Percentage of 5 + Population				
	Provides no unpaid care	**Proved some unpaid care**	**Provides 19 hours or less unpaid care a week**	**Provides 20 to 49 hours unpaid care a week**	**Provides 50 or more hours unpaid care a week**
Cheltenham	92.6%	7.4%	4.2%	1.3%	1.9%
Cotswold	91.9%	8.1%	4.7%	1.2%	2.2%
Tewkesbury	91.5%	8.5%	4.7%	1.4%	2.4%
East	**92.0%**	**8.0%**	**4.5%**	**1.3%**	**2.1%**

	Forest of Dean	90.3%	9.7%	5.1%	1.7%	2.9%
	Gloucester	91.6%	8.4%	4.2%	1.8%	2.4%
	Stroud	91.1%	8.9%	5.3%	1.4%	2.2%
	West	**91.1%**	**8.9%**	**4.8%**	**1.7%**	**2.4%**
	Gloucestershire	**91.5%**	**8.5%**	**4.7%**	**1.5%**	**2.3%**
	England and Wales	**91.1%**	**8.9%**	**4.3%**	**1.8%**	**2.7%**

Digital exclusion

Very little information is collected about this group. The latest information taken from the Participation Survey is at district level and covers the period from May 2023 to March 2024. The results show that in Gloucestershire an estimated 95.6% of respondents have used the internet either at home or elsewhere which is higher than England average of 92.7%. The West area (94.4%) has a lower rate than the East (96.8%) and the county average, but still exceeds the national average.

Table 12: Percentage of respondents aged 16 and over who have used the internet either at home or anywhere else, Gloucestershire, East and West, districts and England, 2023-2024[75]

	Percentage of 16+ Population
Cheltenham	96.9%
Cotswold	94.4%
Tewkesbury	95.8%
East	**96.8%**
Forest of Dean	91.3%

[75] Participation Survey, DCMS

<table>
<tr><td></td><td>
<table>
<tr><td>Gloucester</td><td>92.3%</td></tr>
<tr><td>Stroud</td><td>95.9%</td></tr>
<tr><td>West</td><td>94.4%</td></tr>
<tr><td></td><td></td></tr>
<tr><td>Gloucestershire</td><td>95.6%</td></tr>
<tr><td></td><td></td></tr>
<tr><td>England</td><td>92.7%</td></tr>
</table>
</td></tr>
<tr><td>Geography, for example, urban and rural areas</td><td>This includes specific areas and rural/urban geographies and how this can make it difficult for some people to access the services they need.

The 2021 Rural-Urban Classification (RUC) is a statistical classification system used to categorise geographies based on the form and characteristics of the settlements present within them. It aims to provide a consistent and standardised method for classifying areas as Rural or Urban, based on address density, physical settlement form, population size, and relative accessibility.

Gloucestershire has a significantly higher proportion of its population living in rural areas than the national average (17.5%). The East area has a higher proportion of its residents living in rural areas (32.6%) than the West (26.2%) and the county average.</td></tr>
</table>

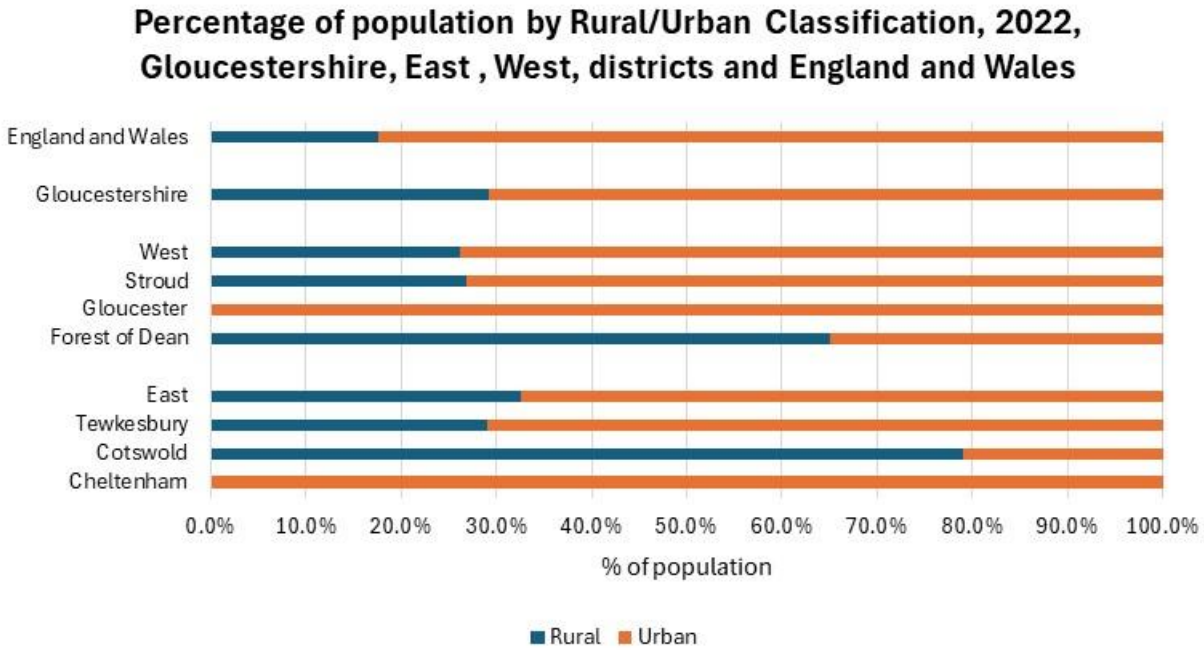
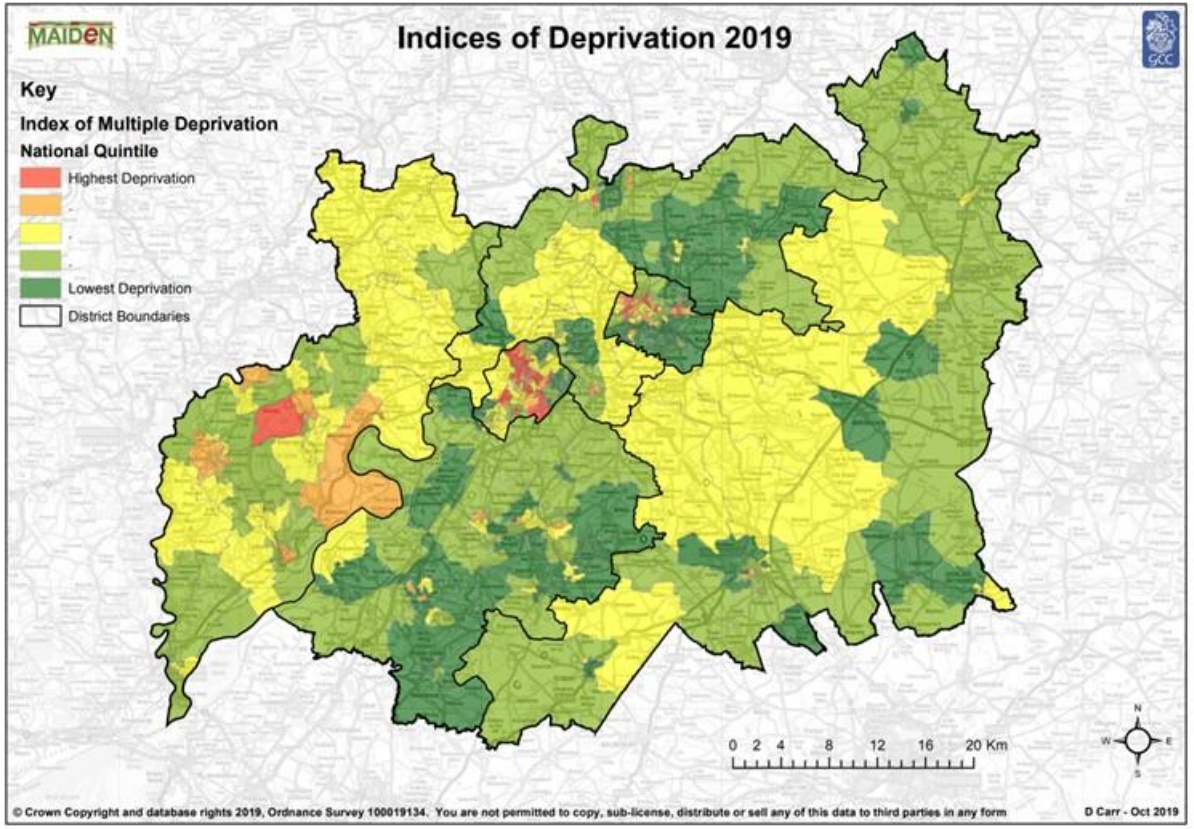


Figure 12: Percentage of population by Rural/Urban Classification, 2022, Gloucestershire, East, West, districts and England and Wales[76]

Socio-economic disadvantage	The main measure for this is the Indices of Multiple Deprivation. In general, Gloucestershire is not a very deprived county, ranking 126 out of 151 (where 1 is the most deprived) county and unitary authorities, putting it in the least deprived 20% of authorities across England. At district level, even the most deprived districts in the county (Gloucester City, and Forest of Dean) are amongst the middle 20% of districts for deprivation out of 317 English authorities. Tewkesbury, Cotswold, and Stroud

[76] Rural Urban Classification, 2021 and 2022 Mid Year Estimates, ONS

districts are in the least deprived 20% of districts nationally. Cheltenham is in the second least deprived 20% of districts nationally. However, there are pockets of deprivation, 31 out of 373 small areas in Gloucestershire are amongst the 20% most deprived in England with 7.9% residents of Gloucestershire living in these areas[77].



[77] Indices of Deprivation, 2019, MHCLG

Figure 13: Indices of Deprivation, 2019[78]

Figure 14 shows the proportion of the population in each deprivation quintile for Gloucestershire the East and West area. The West area has a higher proportion of residents living in the most deprived 20% nationally (10.9%) than the East (4.5%) and the county as a whole (7.9%)

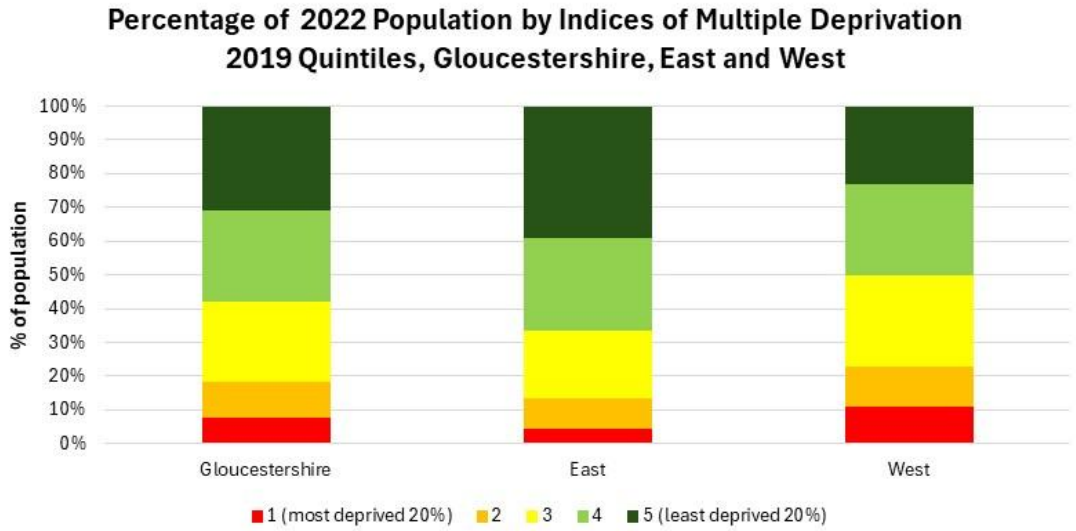


Figure 14: Percentage of 2022 population by Indices of Multiple Deprivation 2019 Quintiles, Gloucestershire, East and West[79]

[78] *Ibid.*
[79] Indices of Deprivation, 2019, MHCLG and Mid 2022 Population Estimates, ONS

Vulnerable groups of society	No specific data held on this characteristic. Where vulnerable groups are addressed through other characteristics.

Appendix 2: Council Staff Data and Information

Details of staff affected by the proposed activity:

Groups	Workforce Data and Information

Age

The table below summarises the most recent publicly available workforce figures for the councils.

Organisation	Snapshot date	Headcount / FTE	Age profile	Source
Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	45–54 largest (32.4%)	GCC-EDI-2024
Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	50–59 largest group	SDC-Workforce-2022
Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	50–59 largest group	CBC-Workforce-2023
Tewkesbury Borough Council	31 Mar 2022	216	—	TBC-GPG-2022
Cotswold District Council	2024	Small direct workforce; most staff via Publica. Data provided represents 127 individuals.	50–59 largest group (36.2%)	CDC-Publica-2024
Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return. Data	50+ largest group (43.8%)	FODDC-Publica-2024

			provided represents 112 individuals.		
	Gloucester City Council	2022	261	56+ largest group (26.1%)	GC-EDI-2022

Disability

The table below summarises the most recent publicly available workforce figures for the councils.

Organisation	Snapshot date	Headcount / FTE	Disability	Source
Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	4.80%	GCC-EDI-2024
Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	5.0%	SDC-Workforce-2022
Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	10.1%	CBC-Workforce-2023
Tewkesbury Borough Council	31 Mar 2022	216	—	TBC-GPG-2022
Cotswold District Council	2024	Small direct workforce; most staff via Publica	1.57%	CDC-Publica-2024
Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	2.36%	FODDC-Publica-2024
Gloucester City Council	2022	261	6.1%	GC-EDI-2022

Sex

Organisation	Snapshot date	Headcount / FTE	Gender split	Source
Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	70.1% F / 29.9% M	GCC-EDI-2024

	Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	58.6% F / 41.4% M	SDC-Workforce-2022
	Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	52.9% F / 47.1% M	CBC-Workforce-2023
	Tewkesbury Borough Council	31 Mar 2022	216	70.4% F / 29.6% M	TBC-GPG-2022
	Cotswold District Council	2024	Small direct workforce; most staff via Publica	70.87% F/ 29.13% M	CDC-Publica-2024
	Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	65.18% F/ 34.82% M	FODDC-Publica-2024
	Gloucester City Council	2022	261	60.9% F / 39.1% M	GC-EDI-2022

Race

The table below summarises the most recent publicly available workforce figures for the councils.

Organisation	Snapshot date	Headcount / FTE	Ethnicity	Source
Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	White British 86.6%; DEC 7.5%	GCC-EDI-2024
Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	89.7% White British	SDC-Workforce-2022
Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	210 White British; 11 Other; 17 Unknown	CBC-Workforce-2023
Tewkesbury Borough Council	31 Mar 2022	216	—	TBC-GPG-2022
Cotswold District Council	2024	Small direct workforce; most staff via Publica	White - British: 29.92%	CDC-Publica-2024
Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	White – British: 36.61%	FODDC-Publica-2024

	Gloucester City Council	2022	261	White 70.5%; Unstated 21.5%; BME 8.0%	GC-EDI-2022
Gender reassignment	No data is publicly available regarding gender reassignment for any of the councils.				
Marriage & civil partnership	The table below summarises the most recent publicly available workforce figures for the councils.				

	Organisation	**Snapshot date**	**Headcount / FTE**	**Marriage & Civil Partnership**	**Source**
	Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	Divorced/Dissolved Civil Partnership 5.8%; Married/Civil 48.2%; Separated 2.4%; Single/Never Married 35.3%; Widowed 0.6%; Prefer not to say 7.7%	GCC-EDI-2024
	Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	—	SDC-Workforce-2022
	Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	—	CBC-Workforce-2023
	Tewkesbury Borough Council	31 Mar 2022	216	—	TBC-GPG-2022
	Cotswold District Council	2024	Small direct workforce; most staff via Publica	Married: (7.56% Single: 14.17% Divorced: 3.94% Living with Partner: 0.79% Widowed: 0.79%	CDC-Publica-2024
	Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	Married: 16.07% Single: 6.25% Divorced: 0.89%	FODDC-Publica-2024
	Gloucester City Council	2022	261	-	GC-EDI-2022
Pregnancy & maternity	No data is publicly available regarding Pregnancy & Maternity for any of the councils.				

Religion and/or belief	The table below summarises the most recent publicly available workforce figures for the councils.

Organisation	Snapshot date	Headcount / FTE	Religion	Source
Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	Buddhist 2.1%; Christian 32.2%; Hindu 0.0%; Jewish 0.0%; Muslim 3.4%; None 52.1%; Other 4.1%; Sikh 0.7%; Prefer not to say 5.5%	GCC-EDI-2024
Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	—	SDC-Workforce-2022
Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	—	CBC-Workforce-2023
Tewkesbury Borough Council	31 Mar 2022	216	—	TBC-GPG-2022
Cotswold District Council	2024	Small direct workforce; most staff via Publica	No religious belief: 20.47% Christian: 3.94% Some other religion or belief: 0.79% Prefer not to say: 74.80%	CDC-Publica-2024
Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	Christian: 2.68% No religious belief: 1.79% Prefer not to say: 0.89% Protestant: 0.89% Blank / Not Provided: 93.75%	FODDC-Publica-2024
Gloucester City Council	2022	261	-	GC-EDI-2022

<table>
<tr>
<td>Sexual orientation</td>
<td>The table below summarises the most recent publicly available workforce figures for the councils.
<table>
<tr><th>Organisation</th><th>Snapshot date</th><th>Headcount / FTE</th><th>Sexual orientation</th><th>Source</th></tr>
<tr><td>Gloucestershire County Council</td><td>1 Jul 2024</td><td>4,369 (excl. schools)</td><td>Bi-sexual 2.6%; Gay/Lesbian 2.1%; Heterosexual/Straight 86.0%; Prefer not to say 9.4%</td><td>GCC-EDI-2024</td></tr>
<tr><td>Stroud District Council</td><td>Apr 2022</td><td>379 (344.3 FTE) + 50 casual</td><td>—</td><td>SDC-Workforce-2022</td></tr>
<tr><td>Cheltenham Borough Council</td><td>Mar 2023</td><td>238 (220 FTE) + 12 casual</td><td>—</td><td>CBC-Workforce-2023</td></tr>
<tr><td>Tewkesbury Borough Council</td><td>31 Mar 2022</td><td>216</td><td>—</td><td>TBC-GPG-2022</td></tr>
<tr><td>Cotswold District Council</td><td>2024</td><td>Small direct workforce; most staff via Publica</td><td>Heterosexual: 32.28%
Not stated: 2.36%
Bisexual: 0.79%
Blank / Not Provided: 66.93%</td><td>CDC-Publica-2024</td></tr>
<tr><td>Forest of Dean District Council</td><td>2024</td><td>Part of Publica; 270+ staff proposed to return</td><td>Heterosexual: 41.07%
Blank / Not Provided: 58.93%</td><td>FODDC-Publica-2024</td></tr>
<tr><td>Gloucester City Council</td><td>2022</td><td>261</td><td>-</td><td>GC-EDI-2022</td></tr>
</table>
</td>
</tr>
<tr>
<td>Armed Forces community</td>
<td>No data is publicly available regarding the Armed Forces Community for any of the councils.</td>
</tr>
</table>

Carers	No data is publicly available regarding Carers for any of the councils.
Care leavers / care experienced adults	No data is publicly available regarding Care leavers / care experienced adults for any of the councils.
Digital exclusion	No data is publicly available regarding Digital exclusion for any of the councils.
Geography, for example, urban and rural areas	No data is publicly available regarding Geography of the workforce for any of the councils.
Socio-economic disadvantage	No data is publicly available regarding Socio-economic disadvantage of the workforce for any of the councils.
Vulnerable groups of society	No data is publicly available regarding Vulnerable groups of society disadvantage of the workforce for any of the councils
References used for Staffing Data	GCC-EDI-2024: Gloucestershire County Council – Equality, Diversity & Inclusion (EDI) Report 2024/25 https://www.gloucestershire.gov.uk/media/2126661/edi-report2024_workforce_final_.pdf SDC-Workforce-2022: Stroud District Council – Workforce Statistics (April 2022) https://www.stroud.gov.uk/media/2103085/workforce-statistics-2022.pdf CBC-Workforce-2023: Cheltenham Borough Council – Workforce Statistics (March 2023) https://www.cheltenham.gov.uk/downloads/file/6208/workforce-statistics-march-2023

	TBC-GPG-2022: Tewkesbury Borough Council – Gender Pay Gap Report 2022 https://www.tewkesbury.gov.uk/media/fzxhofgv/gender-pay-gap-report-2022-final.docx.pdf CDC-Publica-2024: Cotswold District Council – Council spending / staffing details (Publica model) https://www.cotswold.gov.uk/about-the-council/transparency-and-open-data/council/spending/ FODDC-Publica-2024: Forest of Dean District Council – News release (July 2024) https://news.fdean.gov.uk/news/local-authorities-to-consider-moving-forward-with-plans-to-take-greater-control-of-council-services GC-EDI-2022: Gloucester City Council Workforce Equality, Diversity & Inclusion Report (Sept 2022) https://www.gloucester.gov.uk/media/4m3p0bpy/city-workforce-equality-diversity-inclusion-report-final-2022.pdf LGA-GPG-2025: Local Government Association – The gender pay gap in English local authorities 2024/25 https://www.local.gov.uk/publications/gender-pay-gap-english-local-authorities-20242

Local Government Reorganisation in Gloucestershire

Two Unitary Authority (2UA) Full Proposal

Contents

Executive Summary 3

Introduction and Context 6

The Strategic Case (Vision & Ambition) 18

Future Devolution 29

Options Analysis 35

The New Councils: Future Operating Model 64

The New Councils: Workforce 70

The New Councils: Digital, Data, and Technology 74

The New Councils: Democratic Arrangements 81

The New Councils: Empowering Gloucestershire – Our New Locality Arrangements 84

The Financial Case for Two Unitary Councils (East/West) for Gloucestershire 93

Engagement to Discover and Improve 105

Implementation Roadmap 112

Appendix 1: Vision and Ambition 'Personas' 130

Appendix 2: Digital, Data, and Technology Case Studies 136

Appendix 3: Public Engagement Report (Cratus) 140

Appendix 4: Summary Report of Feedback from Partner Organisations (Engagement conducted June - August 2025) 176

Appendix 5: Detailed Options Analysis 211

Appendix 6: Proposed Service Delivery Models 260

Appendix 7: Equalities Impact Assessment (2UA) 271

Executive Summary

Gloucestershire is poised for a bold transformation in local governance. This proposal recommends replacing the current two-tier system of county, district, borough, and city councils with a **Two-Unitary Model (2UA)** as follows:

- **East** - comprising the districts of Cheltenham, Cotswold, and Tewkesbury (population 310k)
- **West** - comprising the districts of Gloucester, Forest of Dean, and Stroud (population 349k)

At this stage, the two new unitary councils are referred to as 'East' and 'West' for clarity. Names for each authority will be agreed as part of the reorganisation process.

The 2UA model will streamline decision-making, reduce duplication, and unlock significant financial and operational efficiencies - while strengthening local identity and empowering communities through innovative **Neighbourhood Partnerships**.

This reorganisation is not just structural, it's strategic. It aligns with Ministerial criteria for Local Government Reorganisation (LGR) and positions Gloucestershire as a national leader in regional devolution, ready to shape the future of public service delivery.

Economic and Demographic Context

- Gloucestershire's economy generated **£22.1bn GVA** in 2023, with strengths in **advanced manufacturing, cyber, aerospace, and agri-tech**
- **The population is projected to grow by 17.6% by 2047**, with a sharp rise in residents aged 65+
- Pressing challenges include **housing affordability**, **rural isolation**, and **climate resilience.**

Our Vision and Ambition

We're building on what makes Gloucestershire great to create a sustainable place with thriving communities, bold ideas, and opportunities for everyone. LGR is the enabling change that allows us to meet these challenges and deliver a ***smarter, fairer, and greener Gloucestershire***. Our six key ambitions that give life to this commitment are:

1. **Driving breakthrough innovation for national resilience**

2. **Harnessing digital to tackle inequality, improve services, and drive innovation**
3. **Empowering communities through co-design and local decision-making**
4. **Putting wellbeing, housing, and nature recovery at the heart of growth**
5. **Unlocking talent, skills, and housing for inclusive growth**
6. **Using data to transform transport and public services**

These ambitions are designed to unlock Gloucestershire's full potential and deliver tangible benefits for residents.

The 2UA Financial Case

Potential day one financial position (c. 1st April 2028)	**East UA**	**West UA**
Total income	£410.5m	£440.9m
Total expenditure	£388.6m	£462.8m
Net position	**£21.9m (surplus)**	**-£21.9m (deficit)**
Total revenue implication of Fire & Rescue (i.e. additional pressures for the new UA)	-£1.35m	-£1.45m
Net position (incl. impact of Standalone Fire & Rescue Authority)	**£20.5m (surplus)**	**-£23.3m (deficit)**
Reorganisation Costs and Benefits	**East UA**	**West UA**
Gross annual reorganisation savings	£8.6m	£10.3m
Ongoing annual disaggregation costs	£3.7m	£4.4m
Net annual savings	£4.9m	£5.9m
One-off transition costs	-£13.2m	-£15.8m
One-off Fire and Rescue disaggregation costs	£0.5m	£0.6m
Total one-off transition costs	-£13.7m	-£16.4m
Payback period	4.9 years	4.9 Years
Cumulative net saving after 5 years	£0.5m	£0.5m
Cumulative net saving after 10 years	£26.3m	£28.5m

Transformation benefits	East UA	West UA
Recurring annual transformation savings fully delivered by year 5 – **Base**	£7.4m	£8.8m
Recurring annual transformation savings fully delivered by year 5 – **Stretch**	£12.0m	£14.4m

Governance, Democracy, and Place

- **110 councillors** for Gloucestershire (52 in the West, 48 in the East)
- A unified electoral cycle and **streamlined decision-making**
- Strong locality working via **Neighbourhood Partnerships** (7-12 neighbourhoods within each authority, 20k–50k population each)
- **Trusted, innovative partnerships** with Town and Parish Councils and the Voluntary, Community, Faith and Social Enterprise (VCFSE) sectors.

Digital, Data, and Technology (DDaT)

- A **digitally enabled council** with inclusive, responsive services
- Investment in **AI**, **predictive analytics**, and **cloud platforms**
- Focus on **digital inclusion** and robust infrastructure.

Built together, backed by evidence

Our proposals have been developed by **all Gloucestershire councils working together** in setting the vision, using a common evidence-base, and working within a single financial model and option appraisal process.

Our **public and stakeholder engagement has enriched and improved our proposals**. We are committed to delivering better outcomes for and with local people and making **LGR the platform for a better Gloucestershire.**

Both the single unitary (1UA) and two unitary (2UA) proposals have been developed using a common evidence base, shared data sources, and consistent analytical methods. As a result, there are significant similarities across both proposals.

In addition to the geographic footprints, key differences between the 1UA and 2UA proposals are highlighted within the shared options analysis and the respective financial cases.

Introduction and Context

Gloucestershire isn't like anywhere else in the UK.

From postcard-perfect Cotswold villages to codebreaking at GCHQ and the roar of the Shed at Gloucester Rugby, this is a county where history fuels a thriving present. Our culture, economy, and identity are deeply rooted yet rapidly evolving.

We're not defined by a single centre. Gloucestershire is a proud network of city, towns, villages, and rural communities, each with its own pulse. Cheltenham leads in innovation, Stroud bursts with creativity, the Forest of Dean harnesses natural assets, Tewkesbury drives manufacturing, Gloucester powers civic life, and the Cotswolds are shaping the future of sustainable energy.

Our diverse places have built a rich patchwork of industries, cultures, and stories. And now, with a bold vision for the future, a single tier of local government could unlock even more. A devolved Gloucestershire would be decentralised, interconnected, and resilient - ready to turn its unique strengths into shared success.



This document sets out the case for change for a new model of local government in Gloucestershire – a model that will enable us to build on what makes Gloucestershire great, to create a sustainable place with thriving communities, fresh ideas, and opportunities for everyone.

About Gloucestershire

Gloucestershire sits at the northern edge of the South West - perfectly placed and powerfully connected. It borders three unitary authorities - South Gloucestershire, Swindon, and Wiltshire - and links to Oxfordshire, Warwickshire, Worcestershire, Herefordshire, and Monmouthshire. Sitting to the north of the M4 / M5 crossroads, with the M5 weaving northwards through the county, Gloucestershire links north and south, east and west, and connects several major UK cities Cardiff, Bristol, Birmingham, Oxford, and London. The River Severn winds through the county's core, shaping both landscape and life.

Though 87.5% of the county is rural, **over 70% of residents live in urban areas**[1]. Cheltenham and Gloucester are the beating hearts of business, education, culture, and commerce, supported by a network of vibrant market towns that fuel local economies and serve rural communities.

- The population of Gloucestershire is currently 659,276[2]
- Gloucestershire spans 265,253 hectares[3]
- We are proud to have two Areas of Outstanding Natural Beauty (AONB): the Cotswolds and the Forest of Dean
- Gloucestershire also has 12 National Nature Reserves and some 120 Sites of Special Scientific Interest (SSSI) within its borders
- According to the 2011 Census, 83.1% of Gloucestershire residents also work in the county[4].

Population Change

Gloucestershire is growing, and fast. Between 2014 and 2024, the county's population has risen by 7.8%, outpacing the national average of 5.9%. But growth hasn't been even. Districts like Tewkesbury are booming, with a staggering 16.6% population increase, ranking in the top 10% of fastest-growing local authorities six times since 2014[5].

At the same time, **Gloucestershire is ageing.** People aged 65+ make up 22.1% of the population, well above the national average of 18.8%. In rural areas like the Cotswolds and Forest of Dean, that figure climbs above 25%. The county also has fewer children and working-age adults than the national average.
Gloucester and Cheltenham have the highest proportions of young people within

[1] Rural Urban Classification 2021
[2] Mid 2023 Population Estimates, ONS
[3] SAM 2023, ONS Area to Mean High Water Excluding Area of Inland Water (Land Area) (AREALHECT)
[4] 2011 Census, ONS
[5] Mid Year Population Estimate. ONS

the county, reflecting their urban character and the presence of educational institutions.[6]

Looking ahead, the population is projected to grow by **113,929 people by 2047** - a 17.6% increase, far above the 12.7% forecast for England and Wales. Tewkesbury and Stroud are set for even greater projected growth of 29.6% and 22.2% respectively, driven by more available land for development. Cheltenham, by contrast, is expected to see the smallest rise at 10.1%[7].

Economy

Gloucestershire's natural beauty is both a challenge and a magnet. With AONBs covering large parts of the county, development can be constrained, but this same environmental quality makes the county a magnet for talent, investment, and tourism.

The economy is strong, diverse, and resilient. In 2023, Gloucestershire's economy generated £22.1 billion in GVA - 12.8% of the South West's output and 1% of the UK total[8]. It's a county where quality of life meets business opportunity.

Gloucestershire offers a powerful mix: **a skilled workforce, strong connectivity, available land, and a high-quality environment.** That's why it's home to major players like GE Aviation, Safran, Renishaw, EDF Energy, Ecotricity, Unilever-Walls and St. James's Place, alongside a thriving ecosystem of entrepreneurs and innovators.

With deep roots in defence and aerospace, the county remains a manufacturing powerhouse, especially in advanced engineering. It's also a national centre for cyber and intelligence, anchored by GCHQ, the National Cyber Security Centre, and a growing cyber business park.

Despite its specialisms, **Gloucestershire's economy is diverse and balanced.** In 2023, the top employment sectors were wholesale and retail (14.8%), health and social care (13.8%), and manufacturing (10.6%)[9] - a mix that supports stability and adaptability.

Challenges Facing Gloucestershire

But Gloucestershire isn't without its challenges. Demographic change, widening inequalities, pockets of deprivation, environmental pressures, and rural isolation all pose serious hurdles to inclusive, sustainable growth.

[6] Mid Year Population Estimate. ONS
[7] 2022 based Subnational Population Projections, ONS
[8] Regional gross value added (balanced) per head and income components, ONS
[9] BRES, ONS

Demographic Change

Gloucestershire's population is ageing, and faster than the national average. By 2047, the number of residents aged 65+ is projected to surge by 43.4% (compared to 38.6% nationally), making up over a quarter (26.8%) of the county's population. Tewkesbury is set to see the sharpest rise at 54%, while even the lowest increase - 32.4% in the Forest of Dean - is significant[10].

At the same time, the working-age population (18-64) is barely growing, and the number of children and young people is expected to decline. This shift is reshaping the county's social and economic landscape.

More people are living with disabilities and long-term conditions across all age groups. There's also a rise in single-person households with limited family support, and a growing number of children with special educational needs (SEN) since 2015, all adding pressure to already stretched health and social care services.

By 2047, Gloucestershire's **dependency ratio** (the number of dependents per 100 working-age people) is projected to rise from 65 to 70[11]. That means fewer people supporting more, placing increasing strain on services, budgets, and the local economy.

The challenge is clear: how do we continue delivering high-quality care and support while maintaining a healthy, productive economy in the face of rapid demographic change?

Inequalities and Deprivation

Gloucestershire performs well overall, but averages hide deep inequalities. While county-wide outcomes often exceed regional and national benchmarks, they mask stark local disparities. 12 neighbourhoods across Gloucester, Cheltenham, Tewkesbury, and the Forest of Dean (home to a combined 3.2% of the county's population) rank among the **10% most deprived in England[12]**.

Some communities face even greater barriers to inclusion and opportunity, including **rough sleepers, non-white and non-English speaking residents, traveller communities, and asylum seekers**. For these groups, access to healthcare, education, and skills development is often harder, and outcomes are worse.

[10] 2022 based Sub-national Population Projections, ONS
[11] 2022 based Sub-national Population Projections, ONS
[12] Indices of Deprivation 2019

Access to Housing

Housing in Gloucestershire is expensive, and getting on the property ladder is tough. In 2025, the average home cost **8.6 times the median salary**, higher than the national average (7.5) and just above the South West average (8.5). But this affordability varies widely: in Gloucester, the ratio is 7.3 and, in the Cotswolds, it soars to 13.8.

With mortgage lenders typically capping loans at 4.5 times income, many residents are priced out, forced into unsuitable housing, or pushed out of the county altogether. This makes it harder to attract and retain young people, key workers, and future talent[13].

Despite these pressures, housing supply has grown. Between 2019 and 2024, the number of dwellings in Gloucestershire rose by **5.2%**, outpacing both the regional (4.6%) and national (4.7%) averages[14].

Yet unlocking further housing and growth remains a major challenge. Much of Gloucestershire doesn't have a five-year housing supply, increasing the likelihood of speculative planning applications, misalignment with local priorities, and unsustainable growth. Planning constraints, infrastructure limitations, and the need to protect Gloucestershire's natural and historic environment all create friction. Balancing growth with sustainability, affordability, and community needs will be critical to the county's future.

Recent updates to the National Planning Policy Framework and the anticipated Planning and Infrastructure Bill promise a step change in housing delivery. The Bill will introduce a statutory Spatial Development Strategy, giving Gloucestershire a powerful new tool to shape future growth. Combined with the streamlining of the planning system via unitarisation, this could unlock significant sustainable development across the county. We must seize this opportunity, while being conscious of possible environmental and democratic risks.

Rural Isolation

Gloucestershire's rural charm is one of its greatest strengths, but also one of its biggest challenges. With 87.5% of the county classed as rural and nearly 30% of residents living in these areas, access to essential services isn't always easy[15]. Nearly **one in five people** live in areas ranked among the **20% most deprived in England** in terms of Barriers to Housing and Services[16].

[13] Median House Prices to Median Workplace Earnings, ONS
[14] Live tables on dwelling stock, MHCLG
[15] Rural/Urban Classification, 2022, ONS
[16] Indices of Deprivation, 2019, MHCLG

Travel times to key services - whether by public transport, car, or active travel - are longer than both regional and national averages[17]. And while high-speed broadband now reaches almost every address, **digital exclusion persists**: 4.4% of residents didn't use the internet at all between May 2023 and March 2024. In rural areas, where public internet access points can be over 45 minutes away by bus, those without a car face real digital isolation[18].

The challenge is clear: we must ensure Gloucestershire's most vulnerable and isolated residents stay connected - to services, to support, and to opportunity.

Climate Change and Flooding

Gloucestershire is making strides on sustainability, but the climate crisis is accelerating. Despite strong progress by county and district councils in cutting emissions and embedding greener practices, the risks to our communities, infrastructure, and economy are growing.

Climate Leadership Gloucestershire has been established as a strategic partnership of public sector bodies - including local councils, the NHS, police, and academic institutions - to coordinate and lead the county's response to the climate and ecological emergency.

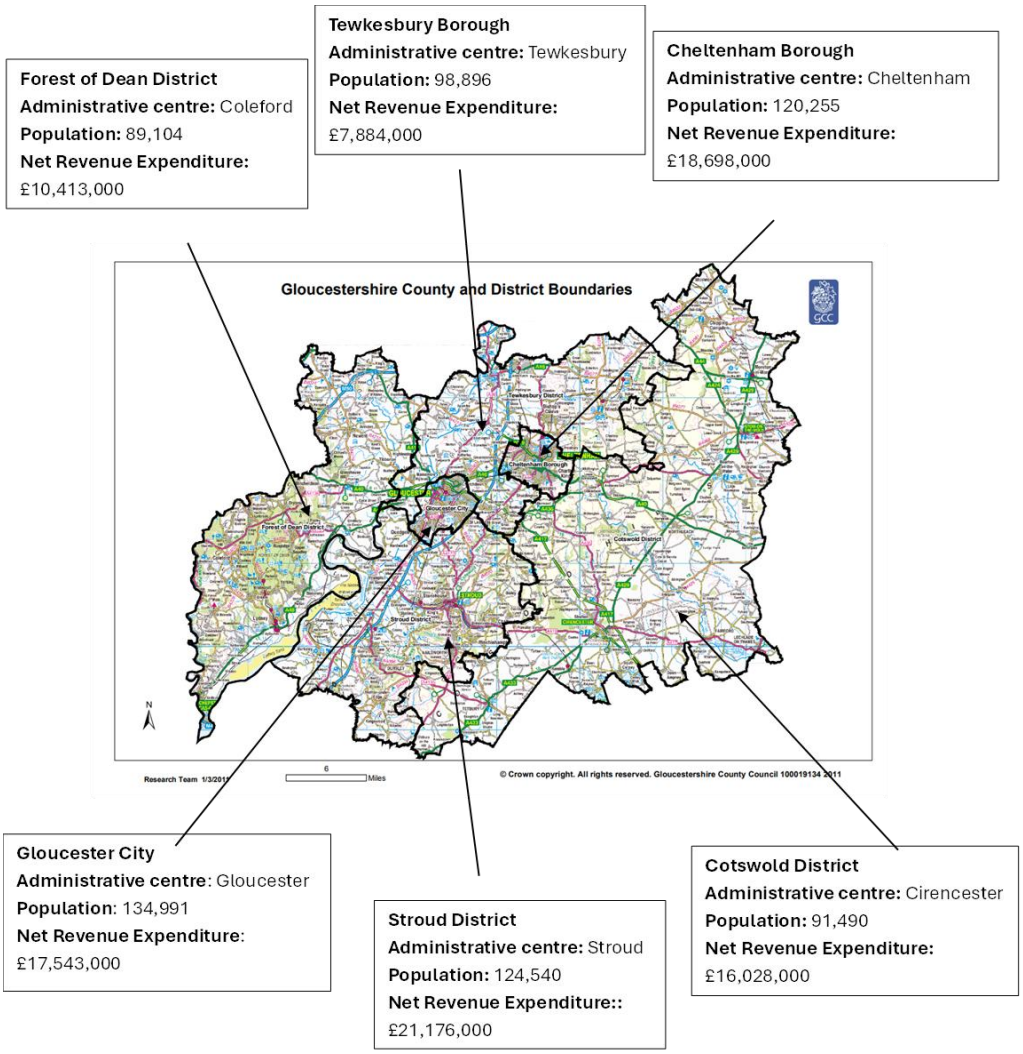
Extreme weather is becoming more frequent and more severe. Gloucestershire is impacted by severe flooding, droughts, and heatwaves. A growing risk of wildfires has also been highlighted by agencies including the Forestry Commission, Gloucestershire Fire and Rescue Service, and Gloucestershire Wildlife Trust.

Flooding remains one of Gloucestershire's biggest climate threats. The devastating 2007 floods damaged around 5,000 homes and 500 businesses, leaving 135,000 people without water for two weeks. Even less intense events in 2012 and 2013 caused widespread disruption. But the impact goes far beyond damaged buildings. **Flooding hits lives, livelihoods, and mental health, especially for the most vulnerable.** That's why climate resilience must be front and centre in our housing strategy and growth plans.

The Current Model of Local Government in Gloucestershire

Gloucestershire operates under a two-tier system: a single county council alongside five district and borough councils and one city council. Most of the county is also covered by a network of **267 parish and town councils**, adding a third layer of local governance in most areas.

[17] Journey Time Statistics 2019, DfT
[18] Participation Survey, DCMS



Political Landscape

With each council on a different electoral cycle, Gloucestershire holds local elections every year, creating a constantly shifting political landscape.

Cheltenham Borough Council	Leader and Cabinet model	Liberal Democrat majority administration
Cotswold District Council	Leader and Cabinet model	Liberal Democrat majority administration
Forest of Dean District Council	Leader and Cabinet model	No overall control; Green minority administration
Gloucester City Council	Leader and Cabinet model	No overall control; Liberal Democrat minority administration

Stroud District Council	Committee system	No overall control; Green minority administration
Tewkesbury Borough Council	Committee system	No overall control; Liberal Democrat minority administration
Gloucestershire County Council	Leader and Cabinet model	No overall control; Liberal Democrat minority administration

Table 1: Current political control across Gloucestershire

Gloucestershire's seven councils have 295 councillors, 37 of whom serve at both county and district/borough levels. In many areas, overlapping ward boundaries mean residents can be represented by up to **four different councillors**: one at the county level and three at the district or borough level. This layered system can create complexity in local representation and decision-making.

Number of councillors	**Gloucester City**	**Cheltenham Borough**	**Tewkesbury Borough**	**Stroud District**	**Cotswold District**	**Forest of Dean District**	**Gloucestershire County Council**
Liberal Democrats	17	36	16	2	21	1	27
Labour / Labour and Co-operative	7			18		4	1
Conservative	11		9	6	10	6	6
Green		3	4	24	2	15	9
Independents / Other	4	1	8	1	1	10	1
Reform			1			2	11

Table 2: Current political make up of Gloucestershire's councils

Partnerships and Joint Working

Gloucestershire thrives on strong partnerships within the county and beyond. We have a proven track record of coming together to tackle big

challenges, and unitarisation offers a powerful opportunity to build on that foundation, strengthening collaboration and delivering even greater impact.

Statutory Partners

Gloucestershire's public sector is unusually coterminous. A single police constabulary and one police and crime commissioner serve the entire county. The county council also acts as the fire and rescue authority, with Gloucestershire Fire and Rescue Service fully integrated. While the county is currently served by a single NHS Integrated Care Board (ICB), this arrangement is set to evolve with the formation of a new cluster alongside Bristol, North Somerset, and South Gloucestershire (BNSSG) ICB, marking a shift in how integrated care is coordinated across the South West region.

Some smaller units of delivery, such as primary care networks, fit within current district boundaries. There are three universities, the largest of which is the University of Gloucestershire, and over 300 schools.

Reducing the current two-tier system of seven principal councils to two unitary councils for Gloucestershire would provide a simplified local government structure for public services alignment.

Joint Working

Gloucestershire already has a strong foundation for joint working, backed by a range of formal and informal governance arrangements**.** These reflect the close ties between different parts of the county and a shared commitment to collaboration.

Key structures include:

- **Leadership Gloucestershire:** a strategic alliance of senior public sector leaders - spanning councils, health, police, and key agencies - providing unified direction on cross-cutting issues to benefit communities countywide.
- **Gloucestershire City Region Board**: a joint committee of all seven councils, driving a shared vision for strategic growth and economic success, and championing Gloucestershire with partners, such as the Western Gateway Partnership, to attract further investment and growth.
- **Joint Economic Strategy Scrutiny Committee:** a joint scrutiny committee which holds the Gloucestershire City Region Board to account - reviewing decisions, tracking the impact of economic investments, and shaping future growth priorities.
- **Health and Wellbeing Board (HWB) and a Health and Wellbeing Integrated Care Partnership (ICP):** the HWB leads strategic coordination across health, social care, and public health services, bringing together leaders to tackle health inequalities and improve population wellbeing. The ICP develops and delivers the five-year integrated care strategy to improve

health and care outcomes, aligning efforts across partners to reduce disparities and improve access and experience.

- **Strategic Local Plan**: when finalised, this will shape future housing and employment growth across three local planning authority areas.
- **Climate Leadership Gloucestershire**: an innovative public sector partnership of councils, NHS, police and academia institutions, developing solutions to tackle the climate emergency.
- **Gloucestershire Business Rates Pool:** Gloucestershire boosts local growth by pooling business rates to keep more revenue circulating within the county.
- Other informal arrangements exist to enable joint working on other areas of shared responsibility, e.g. **Gloucestershire Resources and Waste Partnership**, **Gloucestershire Strategic Migration Partnership**, **Gloucestershire Housing Partnership**, and the **Gloucestershire Children and Young People's Coalition**.

Beyond formal governance, collaboration is also embedded in service delivery:

- **Ubico**: a local authority-owned company delivering a range of environmental services across Gloucestershire and West Oxfordshire, including waste, recycling, and street cleansing.
- **Publica**: a shared services partnership owned by Cotswold, Forest of Dean, Cheltenham, and West Oxfordshire councils. The councils work together through Publica to share skills and resources, including services such as ICT, customer services, benefits administration, housing, and car park enforcement.
- **Shared services**: various arrangements between different groups of councils for sharing back-office services, such as internal audit and risk (ARA) and legal services (One Legal).
- **Co-located services**: the Public Services Centre in Tewkesbury brings together the county council, borough council, police, health services, and the voluntary sector to provide a single access point for customers, pioneering the first Jobcentre Plus co-location in a local authority building.

These partnerships show what's possible but also highlight existing complexity. A more streamlined governance model could build on this strong collaborative culture, reducing duplication, and unlocking even greater impact for Gloucestershire's communities.

Economic Partnerships

Strong economic partnerships are the backbone of Gloucestershire's success - and devolution can take them even further.

Gloucestershire's Local Enterprise Partnership (LEP), GFirst, established in 2011, has played a key role in uniting business, public, and voluntary sectors to secure government funding and drive job creation. Its **Strategic Economic Plan** (SEP) has supported business growth and skills development and maximised the county's strategic location along the motorway corridor. In 2024, its functions transitioned to the county council, marking a new chapter with the creation of the **Gloucestershire City Region Board**.

Gloucestershire is actively shaping a bold, county-wide vision for inclusive and sustainable prosperity through the development of a **Local Growth Plan (LGP)**.

Although not mandated as for mayoral authorities, Gloucestershire's public sector leaders are stepping up with a LGP that reflects a **shared ambition to unlock the county's full economic potential and improve life for everyone who lives here**. Co-created by all local authorities and shaped through extensive collaboration with businesses, education providers, the voluntary sector, and local communities, the LGP sets out a clear, compelling roadmap for long-term growth and resilience.

By aligning with national frameworks, the plan positions **Gloucestershire as a key contributor to the UK's economic and social missions**, ready to attract investment and drive innovation.

Across the county, **district councils are leading bold, community-driven innovation**, including:

- **Cheltenham**: partnered with Hub8 by Plexal to launch the **MX Innovation Centre**, a workspace for the local tech community.
- **Cotswold:** rolled out a **low-income family tracker** to target support for households in financial difficulty.
- **Forest of Dean**: Forest of Dean District Council, the Centre for Sustainable Energy, and local resident-led group Forest Community Energy have partnered to roll out the AURORA project in the area. This project, supported by several European universities, **promotes energy saving** awareness through inspiring events, a carbon tracker app, and community-owned solar panels.
- **Gloucester:** acknowledged by Nesta and others as sector-leading in asset-based community development, including the establishment of an innovative community development organisation.
- **Stroud:** introduced a **crowdfunding platform** to empower community-led projects and access a share of funding from the council.
- **Tewkesbury**: the **Growth Hub** offers fully funded business support in partnership with the borough council.

A unitary model would supercharge this local innovation, strengthening place-based leadership, aligning economic strategy, and making it easier to deliver joined-up, community-focused growth.

VCFSE Partnerships

Gloucestershire's voluntary, community, faith, and social enterprise (VCFSE) sector, powered by over 4,000 organisations, is vibrant and vital. At its heart is the **Gloucestershire VCS Alliance**, the independent voice that informs, strengthens, and develops the sector. The alliance promotes equal partnerships between VCSE (voluntary, community, and social enterprise) groups and the public and private sectors, supporting VCSE groups and organisations to become more sustainable.

The Know Your Patch (KYP) networks, launched in 2018, are another standout success. Led by local VCSE organisations in each district, they bring together community groups, service providers, and public sector partners around a shared belief: **strong, connected communities are the foundation of resilient lives**.

The Strategic Case (Vision & Ambition)

Local Government Reorganisation Enabling **a Smarter, Fairer, Greener Gloucestershire**

Local government reorganisation (LGR) gives Gloucestershire the chance to deliver more for its residents and to play a stronger role – together - in supporting national priorities. Current structures can be complex and duplicative, making it harder to deliver the best outcomes for our residents and to join up decisions across planning, housing, transport, health, skills, and the environment. **Reorganisation offers the opportunity to simplify accountability and cut duplication, offering our residents greater clarity and improved services.**

This change is what makes our ambitions deliverable. Breakthrough innovation can be scaled when investment, land use and regulation are aligned. Digital inclusion can be advanced when infrastructure, skills, and social support are considered together. Communities can have a stronger role when co-design is embedded consistently across local services. Wellbeing, housing, and nature recovery can be treated as interconnected priorities rather than separate silos. Talent and skills can be directly linked to affordable homes and clear career pathways. Underpinning this is how data can be used effectively across the system to improve services, strengthen transport connectivity, and prevent people from falling through the cracks of a widely dispersed county.

Gloucestershire brings major strengths; we have a world-class economy rich in both heritage and future innovation, outstanding natural capital, and a collaborative civic culture. We also face challenges: 19% of our residents live in the lowest national quintile for access to housing and services, our population has distinct and diverse needs, and opportunities are unevenly shared. LGR is the enabling change that allows us to meet these challenges and deliver a ***smarter, fairer and greener Gloucestershire***. Our six ambitions set out how:

- **Driving breakthrough innovation for national resilience**: harnessing Gloucestershire's industrial and research strengths to create resilience-focused solutions in cyber, aerospace, agri-tech, advanced manufacturing, and natural capital.
- **Harnessing digital to tackle inequality, improve services, and drive innovation**: ensuring every resident has the skills, connectivity, and confidence to access services, education, training, and work.
- **Empowering communities through co-design and local decision-making:** giving residents a stronger role in shaping services, with tools and partnerships that make delivery more responsive to local needs.

- **Putting wellbeing, housing, and nature recovery at the heart of growth:** treating health, affordable homes, and environmental recovery as the foundations of prosperity.
- **Unlocking talent, skills, and housing for inclusive growth:** linking education and training pathways directly to housing and careers that help people stay and thrive in Gloucestershire.
- **Using data to transform transport and public services:** creating trusted, joined-up intelligence to improve safeguarding, support early and anticipatory intervention, and deliver more effective integrated transport.

Our Vision: **We're building on what makes Gloucestershire great to create a sustainable place with thriving communities, bold ideas, and opportunities for everyone.**

Our Six Ambitions for Gloucestershire

Ambition 1: Driving breakthrough innovation for national resilience

Gloucestershire will build on its established strengths in cyber, aerospace, defence, agri-tech, and advanced manufacturing to become a national leader in resilience-led innovation. We will draw on pioneering anchors such as GCHQ, Golden Valley[19] and the proposed Severn Edge project[20] along with our agricultural research centres at Hartpury University[21] and the Royal Agricultural University[22]. By fostering clusters of excellence and supporting research and development (R&D), the county will generate high-value jobs, attract private and public investment, and contribute solutions in areas such as energy security, sustainable food systems, secure supply chains, and the restoration of natural capital. With the upcoming Western Forest[23], alongside our ambition that the Forest of Dean achieves biosphere status[24], we can work at scale on innovation in land management, biodiversity recovery, and climate adaptation.

With our landscapes working alongside our technological advancements, we can ensure that Gloucestershire's resilience is rooted in both its environment and its economy. LGR will strengthen this by removing fragmentation across planning, investment, and regulation, allowing innovation to move from pilots and single clusters to an at-scale resilient economy. This

[19] www.goldenvalleyuk.com
[20] https://western-gateway.co.uk/news-and-blogs/news/severn-edge-sites-potential-home-new-smr-technology/
[21] www.hartpury.ac.uk
[22] www.rau.ac.uk
[23] www.nationalforest.org
[24] www.fdean.gov.uk/planning-and-building/biosphere

integration means that innovation breakthroughs in our resilience led sectors are both developed here but deployed consistently, ensuring benefits are felt not only by residents and businesses in Gloucestershire, but the whole of the UK.

Example benefits:

- **A start-up in Cheltenham's Golden Valley innovation district collaborates with local universities and industry partners to develop new cyber-security tools.** With LGR removing fragmentation across investment and regulation, the start-up can scale faster, attract national contracts, and create high-value local jobs - further anchoring Cheltenham's role in responding to the UK's cyber resilience requirements.
- **A farmer in the Cotswolds adopts new agri-tech tools developed in county innovation hubs.** By using soil sensors and precision irrigation, they improve soil health and resilience to climate change while reducing water and fertiliser use and costs. This not only strengthens the farm's long-term viability but also contributes to Gloucestershire's national reputation in sustainable food systems.
- **A small manufacturer in Tewkesbury trials AI-driven production planning in a regulatory sandbox, enabled by LGR.** The new system helps them cut waste, lower emissions, and respond more flexibly to supply chain pressures. Located near Ministry of Defence and defence sector supply chains, the firm boosts competitiveness and secures new contracts in low-carbon defence and aerospace markets. This demonstrates how resilience-led innovation can be scaled across advance manufacturing - the sector responsible for Gloucestershire's largest Gross Value Added (GVA) - while connecting with other resilience led sectors, both locally and nationally.
- **A STEM (Science, Technology, Engineering & Maths) student in Stroud takes part in placements within Gloucestershire's clean energy sector, working directly on projects linked to the Severn Edge site.** They gain hands-on experience that secures their future career within their own community, while local employers benefit from a pipeline of home-grown talent that supports the county's transition to net zero and enhances the energy security of the UK.

Ambition 2: Harnessing digital to tackle inequality, improve services, and drive innovation

Digital inclusion remains inconsistent across Gloucestershire. Digital access is no longer optional – it is essential in ensuring opportunity and engagement with services. Residents, especially those living in rural areas, can suffer limited access to employment opportunities, education, or care, further exacerbating the hidden

poverty in the county. Building on projects such as the county-wide DigiHubs[25], based in GP surgeries and community centres, **Gloucestershire will ensure that every community has the infrastructure, connectivity, and skills to benefit from the world that digital offers.**

By tackling digital exclusion, we can ensure that residents who struggle to access services, training, or employment are not left behind. LGR offers the opportunity to align responsibility for infrastructure and respond to diverse demand across a complex geography, ensuring digital investment benefits are shared fairly across all communities. This also means all can match the pace of our most advanced future-facing sectors, as we offer support for those at risk of being left behind, so that innovation moves forward inclusively. Improved digital confidence will empower residents to participate fully in their communities, access vital support, and offer increased visibility of opportunity. **Digital innovation will drive the sustainable growth agenda, creating jobs and wealth for the county.**

Example benefits:

- **An older adult in Deerhurst, a rural village in Tewkesbury, manages chronic conditions from home using virtual healthcare tools.** Through secure video consultations and remote monitoring, they reduce hospital visits. LGR can enable this by aligning NHS and council investment in digital infrastructure, so rural areas have the same access to connectivity and digital services as urban centres.
- **A young person in Coleford, a market town in the Forest of Dean, accesses digital skills bootcamps**, gaining confidence and new opportunities in cyber, coding, and creative industries.
- **Carers can use predictive care tools to anticipate needs, freeing time to focus on personal interaction.** By receiving alerts when the person they support may need intervention, they are less reliant on emergency services and more able to plan ahead. This is only possible when health and social care data are brought together, made easier by LGR through creating a single system for sharing data securely and consistently.
- **One of Gloucestershire's many micro businesses uses digital tools to reach new customers and improve their service capability**, e.g. through online ordering or remote collaboration with suppliers. With coordinated county-wide investment in digital connectivity, even the smallest firms in rural areas can compete in wider markets, driving inclusive economic growth.

[25] Delivery of Digi-hubs | Gloucestershire County Council

Ambition 3: Empowering communities through co-design and local decision-making

LGR offers Gloucestershire the opportunity to expand co-design across the county by strengthening the role of the VCFSE sector in service design and delivery. **By giving communities real influence over budgets, priorities, and data, services will be more inclusive, locally responsive, and sustainable.**

Gloucestershire has already demonstrated how effective this approach can be: carers have shaped new support pathways through the Carers Hub[26], and the Gloucestershire Gateway Trust[27] has reinvested profits from the M5 services into projects in Gloucester and Stroud that tackle poverty and improve skills. Local groups in Stroud[28] and the Forest of Dean[29] have influenced health and wellbeing initiatives through community hubs.

With 19% of our population living in the lowest national 20% for access to housing and services[30], empowering communities to shape services based on their local needs is critical to both equity and prevention. Neighbourhood Partnerships are just one example of how LGR could provide a clear framework for convening services with residents – they would sit alongside a wider set of tools to ensure community voices are embedded in decision-making. This approach is founded on building trust and ensuring outcomes are shaped not only by those closest to the challenges, but those experiencing them.

Example benefits:

- **Local residents, councillors, and health practitioners in a Neighbourhood Partnership work together to reduce social isolation in Newent, a Forest of Dean market town.** By combining professional expertise with insights from local people, the Partnership develops community-led activities and accessible support. LGR enables this by aligning funding and decision-making, so neighbourhood priorities can be resourced and embedded within wider service planning.
- **A young carer in Cheltenham is able to provide input into the development of a digital tool with schools and youth services to balance education and caring responsibilities.** The tool provides tailored reminders, wellbeing check-ups and links to local peer support groups. Because LGR enables education, health and social care data to be better connected, the young carer's lived experience regarding the previous systems' lack of navigability are reflected. This makes services easier to

[26] https://gloucestershirecarershub.co.uk
[27] https://gloucestershiregatewaytrust.org.uk
[28] https://cscic.org/programmes/community-hubs/
[29] www.inclusiongloucestershire.co.uk/engagement/community-hubs/
[30] Accessibility - Transport | Inform Gloucestershire

find and use, ensuring their needs are met quickly without having to repeat their story to multiple service providers.

- **A community group in Gloucester collaborates with health providers to design culturally sensitive wellbeing services, improving uptake and trust.** By co-creating mental health support, for example, that recognises diverse cultural practices, more residents feel confident seeking help. LGR supports this by embedding the VCFSE sector within local decision-making frameworks, ensuring community voices are heard alongside statutory providers.
- **Families co-produce services in a local family hub in Tetbury, a Cotswold market town, which provides a family-friendly space.** Parents can take part in shaping early years support, parenting programmes, and wellbeing provision while their children are supported in a safe environment. This is possible because LGR brings together children's services, public health, and community development under one coordinated approach, so family hubs can act as genuine centres for co-creation and prevention.

Ambition 4: Putting wellbeing, housing, and nature recovery at the heart of growth

Wellbeing – with housing and nature recovery at its roots – will be a guiding principle in all policy and investment decisions. From affordable homes and transport to skills and public health, growth plans will be designed to reduce inequalities, improve access to green and blue spaces, and boost Gloucestershire's natural capital. Protecting and enhancing biodiversity, improving land use, and supporting nature-based solutions will strengthen resilience against climate change and create healthier environments for future generations.

Gloucestershire's natural assets also underpin a strong visitor economy. By linking tourism with wellbeing and nature recovery, communities benefit from thriving local businesses while ensuring green spaces remain accessible for residents. Aligning local priorities with Integrated Care System (ICS) prevention goals and CORE20PLUS5[31] frameworks targeting the most deprived 20% of the population (as well as groups experiencing worse-than-average outcomes), will help narrow health and wellbeing gaps across the county.

LGR would make this ambition deliverable by enabling a clear line of accountability across health, housing, and the environment. This coordinated approach can act to turn investment and service delivery into better outcomes for residents. This integration will allow decisions about new housing, green infrastructure, and public services to be planned together - ensuring that residents

[31] www.england.nhs.uk/about/equality/equality-hub/national-healthcare-inequalities-improvement-programme/core20plus5/

have both the secure homes and healthy environments they need. In Stroud, community-led housing and green infrastructure projects have already shown how affordable homes and access to nature can be developed hand-in-hand. With devolved powers, these approaches could be embedded and scaled county-wide, linking wellbeing, housing, and nature recovery as the foundation for genuinely inclusive growth.

Example benefits:

- **In the Forest of Dean, a community-led housing scheme integrates affordable homes with woodland management and local energy generation.** Residents not only gain secure housing but also benefit from reduced fuel bills, shared green spaces, and volunteering opportunities that strengthen community ties. This model reflects the Forest's long tradition of working with its natural assets and could be replicated across Gloucestershire, where LGR enables housing, environment, and community to be planned together.
- **A family in Northleach, a Cotswold market town, regularly uses redesigned green spaces that combine play areas, biodiversity planting, and community facilities.** These spaces give children safe places to play and create opportunities for families to meet neighbours, take part in local activities, and benefit from cleaner air. With wellbeing and social connection at their core, such spaces help reduce isolation and improve health outcomes across generations.
- **A disabled resident in Minchinhampton, a semi-rural town, moves into newly built affordable housing designed with accessibility and sustainability at its core.** The home is energy-efficient, reducing bills, and is linked to inclusive transport and nearby green infrastructure, such as sensory trails and accessible walking routes. This combination gives the resident greater independence, reduces their reliance on more intensive services, and enhances their quality of life. By ensuring housing is planned together with transport and green spaces, these wellbeing outcomes become part of everyday provision rather than specialist exceptions.
- **A landowner in South Cerney, a Cotswold village, participates in a countywide nature recovery scheme that restores habitats, improves flood resilience, and generates long-term natural capital value.** By adopting regenerative practices and working in partnership with local authorities and communities, they help protect biodiversity while strengthening the resilience of nearby housing and infrastructure. Crucially, this in turn enhances residents' wellbeing through multi-faceted environmental improvements that contribute to healthier, more secure day-to-day lives. The wellbeing gains are felt both immediately – through safer,

greener environments – as well as in the longer term, as communities experience less disruption and stress from climate-related risks.

Ambition 5: Unlocking talent, skills, and housing for inclusive growth

Gloucestershire will be able to establish a countywide skills and careers pathway to support lifelong learning and inclusive economic growth. By linking education providers, industry, and employers, residents of all ages and backgrounds will have access to training, apprenticeships, and reskilling opportunities. Tourism and hospitality provide major entry routes into work for young people and career changers. In aligning training pathways with this sector, LGR can help us ensure residents can build stable futures in one of Gloucestershire's most significant industries. Affordable and secure housing will be central to this ambition, providing the stability people need to seize learning opportunities and grow with the confidence that comes from a safe, stable home.

LGR would enable this ambition by aligning housing, skills, and economic development within the same framework. Currently, responsibilities are spread across multiple agencies, making it more difficult to ensure that new homes are built where they connect to training opportunities and local employment. **Gloucestershire can create a coordinated system where homes, learning hubs, and jobs are planned together.** There are strong examples to build on. In Gloucester, the University of Gloucestershire's City Campus Development is bringing new teaching and community space into the heart of the city, while the Forwards Employment Service[32] shows how employers, colleges, and community groups can collaborate to support residents into sustainable work. With LGR, these successes can be scaled across the county, **ensuring that talent is not only retained but is skilled to face the future, knowing their own is secure.**

Example benefits:

- **A Year 12 student in Highnam explores immersive career pathways at a local skills hub**, linking them to mentors in future-focused industries, such as cyber security, clean energy, advanced manufacturing, and engineering. These hubs make it easier for young people to see a future in Gloucestershire, rather than having to move away to build a career. In Gloucester, the University of Gloucestershire's new City Campus development strengthens this offer by providing teaching and community space in the heart of the city, connected to wider affordable housing and employment initiatives. Together, these projects make it easier for young people to see a future in the county rather than moving away. With LGR, this integrated approach to housing, education, and employment can be

[32] www.gloucestershire.gov.uk/health-and-social-care/disabilities/forwards-employment-service/

scaled across Gloucestershire, ensuring that all students - including those in rural areas - can access the same opportunities.

- **A mid-career learner in Winchcombe, a market town in Tewkesbury, retrains in low-carbon construction through flexible programmes**, improving their earning potential while supporting the transition to clean energy. Thanks to housing, public transport, and skills being planned together, they can study locally without facing long commutes or the insecurity of poor-quality rental housing. With stability at home, they are free to focus on building new skills and contributing to Gloucestershire's net zero economy.
- **A young mother in Cheltenham accesses a tailored learning pathway in sustainable construction and materials innovation**, supported by a family-friendly environment and counselling services at a local Family Hub. Over time, she develops expertise and becomes a mentor to others - showing how inclusive pathways strengthen both individual resilience and community cohesion. LGR makes this possible by coordinating housing, skills, and wraparound services under one framework – removing barriers so talent can both flourish and contribute.
- **A young family in Stroud secures affordable housing linked to training opportunities,** allowing them to pursue new careers without instability. Freed from the instability of high housing costs, they can take up retraining and new jobs without the stress of insecure tenancies or long journeys. This stability directly supports wellbeing and ensures Gloucestershire retains and grows its talent base by linking housing delivery with economic inclusion.

Ambition 6: Using data to transform transport and public services

LGR offers Gloucestershire the chance to bring together fragmented data from across multiple authorities and agencies. With devolved powers, this can be turned into usable intelligence that supports earlier intervention and ensures no one is left behind. This separation makes it harder to spot risks early or to design services that reflect real needs. Reorganisation would provide a framework for data use, allowing us to introduce a trusted, secure data infrastructure that can enable services to anticipate needs, respond in real time, and act preventatively.

Linking education, health, housing, transport, and social care data could improve safeguarding measures, reduce waiting times, and ensure fair provision across urban and rural areas. Open data initiatives and live mobility platforms will offer improved journey options, reduce congestion, and promote more sustainable travel choices.

The Robin demand-responsive bus service[33] shows how transport data can connect rural residents to jobs and services, but integration with housing and employment data would make it far more effective. Family hubs can link education, health, and social care data to improve safeguarding and ensure families access support at the right time. Flood management schemes in the Severn Vale already rely on environmental data to protect communities in real time. With LGR, these initiatives could be joined together, scaled across the county and embedded into **a trusted, secure data infrastructure that works for every resident.**

Example benefits:

- **Residents in flood-prone areas receive early warnings through live data platforms.** By combining real-time river levels with local emergency planning, households are given practical, trusted alerts that improve safety, reduce disruption, and protect lives. With devolved powers, these systems could be scaled across Gloucestershire to cover multiple risks, from flooding in the Severn Vale to wildfire risk in the Cotswolds.
- **A commuter in Frampton on Severn, a rural village in Stroud, uses a transport app with real-time data, reducing journey times and supporting sustainable travel.** Backed by devolved powers, the system can ensure affordable fares, reliable rural coverage, and accessible journey options. This also allows councils to use data on passenger demand and road conditions to prioritise road maintenance.
- **At a family hub in Gloucester, a family sits down with staff and views a joined-up record that brings together information from school and health services.** It shows that their child has had a recent dip in attendance and that the parents have both reported stress to their GP. The family are able to identify that they need extra learning support and access to parenting advice before the situation requires a more acute response. The hub uses the data infrastructure to coordinate the right support quickly, reducing pressure on the family and preventing escalation.
- **Farmers can access county-wide soil moisture and yield-forecasting data that helps them to adapt to dry weather conditions and protect arable production.** By bringing agricultural, environmental, and water data together under one system, it fills a current evidence gap and allows farmers to take preventative steps, boosting Gloucestershire's food security and the wider country's resilience to the impacts of climate change.

Ambition in Action: Towards a Resilience-led Economy

The Golden Valley Development (GVD) is a nationally significant innovation powerhouse, **recognised by government as driving the UK's cyber and**

[33] www.gloucestershire.gov.uk/transport/the-robin/

secure technology ambitions. By bringing together industry, academia, and the public sector, GVD is advancing national security and resilience - supporting the UK's mission to embed resilience in critical supply chains infrastructure.

Anchoring Gloucestershire at the heart of the UK's resilience economy, and creating a ripple effect of prosperity across the South West and the nation, the GVD will support supply chains, jobs, and long-term competitiveness.

To unlock its full potential and deliver lasting benefits for local communities and the nation, **we are seeking Designated Area (DA) status for the GVD** - enabling Gloucestershire to retain 100% of business rates growth generated in this area, worth around £385.6m over the designation period. **This locally retained investment will accelerate infrastructure, boost investment, and drive a virtuous cycle of prosperity across the county and beyond.**

DA status means more funding for local infrastructure, skills, and public services - supporting our vision and ambitions for Gloucestershire. Nationally, it will help power UK growth, strengthen resilience, and spark prosperity and innovation across the country.

Summary

We have a bold vision for Gloucestershire - rooted in our heritage and driven by our innovation, shaped by the ambitions of our people, and designed to make every community ***smarter, greener, and fairer***. Through our six ambitions we have shown how services, places, and opportunities can be reimagined to meet the needs of today while preparing for tomorrow.

To bring this vision to life, we have developed a number of personas (see Appendix 1) that illustrate what our ambitions would mean in practice for residents and communities across Gloucestershire. These personas help ground our strategy in real experiences, making clear the tangible benefits of transformation.

The opportunities before us are clear: breakthrough innovation, inclusive digital access, thriving talent pipelines, stronger communities, wellbeing-focused growth, and data-enabled services. **Together they show how Gloucestershire can lead nationally and transform lives locally.**

We know what we need to do. LGR gives us the means to do it through simplifying structures, aligning priorities, and enabling decisions that connect ambition with delivery. With the right reform, Gloucestershire can bring its economic, social, and natural strengths together to create a future where every resident has the chance to succeed.

LGR will allow us to continue **building on what makes Gloucestershire great to create a sustainable place with thriving communities, bold ideas, and opportunities for everyone.**

Future Devolution

LGR is an opportunity for Gloucestershire to reach its full strategic potential, locally and nationally. **As England moves towards wider regional governance, Gloucestershire is well-placed and eager to contribute.**

Our Economic Distinctiveness

Gloucestershire is notably resilient to economic shocks[34]. It has significant strengths in advanced manufacturing and engineering and food security innovation (a combined 23.7% GVA)[35] and is exceptional in the high-growth sectors that utilise emerging technologies[36]. **Our strongest sectors align closely with the priority sectors of the 2025 Industrial Strategy**. Gloucestershire's strong industrial roots in aerospace and engineering, combined with innovation driven by GCHQ, help it **outperform neighbouring areas in productivity, new business creation, and entrepreneurship**. We also host a skilled population, supported by strong universities, colleges, and research networks that have proactively reached out into regional networks.

Inherent to Gloucestershire is our natural capital. From the Cotswolds and Forest of Dean to the Severn Vale, Gloucestershire's landscapes give us the space and resources to lead on the challenges of the 21st century. As part of the Severn Estuary corridor, we can offer clean energy, sustainable food, water management, and climate adaptation. **Few places can match the combination of industrial heritage, high tech growth, and natural assets that define Gloucestershire's offer.**

Gloucestershire blends its landscapes, cultures, and economy into a unique identity that draws on west country heritage and lifestyle to inform future thinking. From the invention of the jet engine to pioneering hydrogen flights at Cotswold Airport[37]; from the Wheatstone Bridge to the Golden Valley; from being home to the invention of the lawnmower to hosting one of the deepest water research sites in the world in Tidenham[38], **our economy is a major asset for regional and national partners in the devolution context.**

Devolution is the key to realising this potential. With greater funding flexibility, joined-up services, and empowered local decision-making, **Gloucestershire can play its full role as a regional engine of growth at the crossroads of the South West, the Midlands, the South East, and Wales.**

[34] Economic Strategy Evidence base
[35] Regional gross value added (balanced) by industry, ONS
[36] Gloucestershire's Economic Strategy 2024–2034 Summary
[37] ZeroAvia completes initial Dornier 228 flight test campaign - Pilot
[38] DEEP - Engineering Wonder

Our Potential Devolution Partners

Gloucestershire is actively exploring three strategic partnerships to the north, south, and east[39]. Of these, we found each offer unique opportunities to accelerate growth and influence:

- West of England Combined Authority (WECA)
- Herefordshire and Worcestershire
- Swindon and Oxford

Our Devolution Option Analysis

A range of metrics were assessed against economic, legislative, cultural, and implementation criteria to identify which partnership could deliver the greatest impact in line with national devolution goals.

Option 1: West of England Combined Authority (WECA)

Geography and Governance

- Existing combined authority with metro mayor which is fully compliant with the Devolution and Community Empowerment Bill 2025 and December 2024 Devolution White Paper.
- Combined population (Gloucestershire + WECA *with North Somerset* rises above the minimum 1.5 million threshold guidance for strategic authority formation).

Strategic Authority Alignment

- Highest degree of alignment across the English Devolution Bill's seven statutory areas of competence, particularly health and care integration, transport and infrastructure, economic development, environment, and public safety.
- Pre-existing governance, transport corridors, NHS integration, and multi-agency delivery capacity provide a rapid implementation route.

Economic Geography Alignment

- Strong alignment in advanced manufacturing, digital/cyber, green technologies, and creative industries.
- Strong worker migration pattern across the borders.
- Potential to position Gloucestershire as an agri-tech leader within a wider innovation economy, offsetting WECA's urban focus.
- Gloucestershire may become a junior partner in the highest growth R&D sectors without a clearly defined role in bringing forward its strengths (e.g. agri-tech).

WECA holds the path to the most immediately deliverable option and offers the broadest alignment with national reform priorities, strongest sector alignment, and the fastest route to full strategic authority status.

[39] Not an exhaustive list – three options were selected according to the shared length of boundary with Gloucestershire and consideration of whether agreements had been made for bordering counties to join alternative partners.

Option 2: Swindon and Oxfordshire

Geography and Governance

- No current combined authority membership so would require LGR and mayoral combined authority formation.
- Joint population threshold met with 1.6 million combined.

Strategic Authority Alignment

- High capability in economic development, skills, and net zero, but weaker in health, care, and integrated public service reform.
- Existing regional partnerships are largely informal or nascent.

Economic Alignment

- Significant longer-term potential in R&D partnerships (AI, life sciences, clean tech).
- Synergy in advanced manufacturing and cyber, but less alignment with agri-tech and rural economy; greater focus on life sciences than securing emerging technologies in the innovation sectors.
- Lower short-term economic integration due to weaker commuting links and business interdependencies.

Swindon and Oxfordshire offer strong innovation potential for the long term but would be slower to establish full statutory competencies with less immediate integration in health and rural sectors.

Option 3: Herefordshire and Worcestershire

Geography and Governance

- No current combined authority and therefore would require LGR and mayoral combined authority formation.
- Population slightly below the threshold so may require additional partners or special consideration.

Strategic and Policy Alignment

- Medium alignment across statutory competencies with strengths in environment, rural transport, and agri-tech, but limited in digital innovation and large-scale economic growth.
- Less alignment with national reform agenda’s focus on integrated care and high-growth sectors.

Economic Alignment

- Closest match in current rural economic strengths and historical cultural context.
- Gloucestershire would likely lead on scale and innovation, but partners offer limited capacity in high-growth digital and tech sectors.

Options Analysis Summary

1. West of England Combined Authority (WECA)

- **Why:** Existing governance, metro mayor, statutory compliance, strong sectoral fit (advanced manufacturing, cyber, green tech), and clear commuting / economic flows; existing regional partnerships across arts, culture, health, and the broadest range of services of all options; similar urban / rural profile, reflecting shared challenges in housing and transport planning.
- **Risk:** Gloucestershire risks becoming a junior partner unless it defines a distinctive role (e.g. agri-tech leader completing a 'whole of tech' future economy).
- WECA provides the high-growth innovation engine, Gloucestershire complements the ecosystem with agri-tech and natural capital.

2. Herefordshire and Worcestershire

- **Why:** Close match in rural economy, heritage, and agri-tech; natural cultural legacy fit; scope for Gloucestershire to play a leading role in innovation and scaling up; slightly under population threshold, but culturally congruent and offers Gloucestershire leadership space.
- **Risk:** Limited digital / tech capacity in partners and weaker alignment with national reform priorities.
- Rooted in shared rural economy and heritage, with Gloucestershire as a natural partner to inject innovation and scale.

3. Swindon and Oxfordshire

- **Why:** Strong in R&D, life sciences, AI, and clean tech; good synergies in advanced manufacturing and cyber, but requires completely new governance; has weaker cultural alignment, and less short-term integration with Gloucestershire's rural and health economies.
- **Risk:** Longer-time horizon to deliver; innovation is research-led and urban, less aligned with Gloucestershire's wider economic identity; very few established regional partnerships.
- Offers long-term potential in global-facing R&D and science but less immediate and less place-congruent.

Gloucestershire has the assets and ambition to contribute strongly within any of the potential partnerships. WECA provides the most immediately deliverable and policy-aligned option, while the Herefordshire and Worcestershire option offers an alternative in which Gloucestershire could play a leading role. The partnership with Swindon and Oxfordshire remains a credible longer-term prospect, particularly for research-led collaboration, but is less immediately aligned to Gloucestershire's wider economic and governance priorities.

Gloucestershire's Aims for Devolution

Through LGR and further devolution, Gloucestershire can unlock the tools to drive a high-growth, resilience-focused economy and smarter services for residents.

Devolution would allow Gloucestershire to:

- **Power growth through innovation:** using devolved economic powers to create the Severn Resilience Corridor, bringing together cyber, advanced manufacturing, agri-tech, and clean energy. This will attract major private investment, generate high-value jobs, and cement Gloucestershire's role as a national growth engine.
- **Strengthen resilience for the 21st century:** with greater control over housing, health, skills, and transport, Gloucestershire can deliver joined-up solutions for climate resilience, energy security, and sustainable food systems.
- **Put data to work for residents:** a county-wide data platform, anchored in Golden Valley's cyber infrastructure could integrate transport, housing, health, and utilities in real time. This will reduce duplication, cut costs, and provide residents with more personalised, responsive services, from flood alerts to smart mobility and integrated healthcare.

Summary

Gloucestershire's strengths in advanced manufacturing, securing emerging technologies, agri-tech, and clean energy, combined with our strategic location and cultural identity, position us as a valuable partner in building a balanced and high-growth regional economy. To achieve this potential, we are now seeking active cooperation from Government and regional partners.

	WECA	Herefordshire and Worcestershire	Swindon and Oxfordshire
Governance and Deliverability	• Existing combined authority with metro mayor • Fully compliant with Devolution Bill • Immediate path to strategic authority.	• Would require new mayoral combined authority • Population below threshold, may need extra partners.	• Would require new mayoral combined authority • Threshold met but no existing structures.
Strategic Alignment	• Highest alignment across all statutory areas: health / care integration, transport, economic development,	• Medium alignment: strong in environment, rural transport, and agri-tech; weaker in digital and national reform priorities.	• Strong in economic development, skills, and net zero; weaker in health and integrated public services.

	environment, and public safety.		
Economic Synergy	• Strong overlaps: advanced manufacturing, cyber, green tech, and creative industries • Clear commuter flows • Gloucestershire could specialise in agri-tech.	• Strongest rural economy and cultural fit • Gloucestershire likely to lead innovation • Partners weaker in high-growth sectors.	• High R&D and research potential: AI, life sciences, and clean tech • Lower commuting / business interdependencies • Less rural alignment.
Risks	• Gloucestershire may be junior partner in innovation without defined agri-tech/natural capital role.	• Weak tech / digital sector capacity • Weaker alignment with national reform.	• Long time horizon • Urban R&D focus less congruent with Gloucestershire's broader identity • Weak regional partnerships.
Overall Takeaway	• Most deliverable, innovation engine, culturally and economically aligned.	• Strong cultural / rural fit • Gloucestershire can lead • Weaker on growth / reform.	• Long-term R&D potential • Least deliverable in short term • Weaker identity fit.

Table 3: Strategic partnerships options analysis summary table

Options Analysis

Our options analysis is an objective assessment of the reorganisation options being explored for Gloucestershire[40]. Each option has been assessed using ministerial criteria, supplemented by local criteria – drawing on a range of both qualitative and quantitative evidence gathered throughout this proposal's development. Additionally, challenge and consensus sessions were held with council leaders and chief executives from across the seven councils.

This analysis provides some key considerations which should inform any overall conclusions. However, in the interests of objectivity and respect for the democratic process, the analysis does not provide a concluding recommendation of a preferred option.

The options analysis presented in this proposal mirrors that submitted for the single unitary authority option.

All the analysis undertaken in this options analysis is subject to the policy decisions of whichever new authority / authorities are established as a result of LGR in Gloucestershire. This analysis is also contingent on the outcome of the national Fair Funding Review, which remains uncertain at this stage.

This analysis assumes there are no modifications to the boundary between East and West Gloucestershire. Should boundary modifications arise, the underpinning evidence – particularly the financial case and RAG ratings – would need to be revisited.

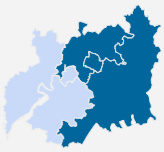
Option	Description	Geography		Population
Option 1: Single Unitary Authority (1UA)	**One new council delivering all local government services across Gloucestershire.**		Based on current **Gloucestershire County Council** boundary	**~ 659,276**
Option 2: Two Unitary Authorities (2UA – East and West)	**Two new councils: one for East Gloucestershire, one for West Gloucestershire. Each delivers all services within its area.**		**East:** currently **Cheltenham, Cotswold and Tewkesbury** districts	**~310,641**
			West: currently **Gloucester, Stroud and Forest of Dean** districts	**~348,635**

Table 4: Options analysis summary table

[40] Not including 'Greater Gloucester/Gloucester Unitary' which has not been subject to a shared process of development

Demographic and Economic Context

The following tables present a side-by-side comparison of key demographic, financial, and economic indicators for Gloucestershire as well as East and West Gloucestershire.

Population and Ageing Trends

This table provides an overview of demographic patterns across Gloucestershire and East, and West, focusing on population size and age-related growth to inform future service planning and statutory obligations.

Measure	Glos.	East	West	Implications
Population (2024)	**~659,276**	~310,641	~ 348,635	The West has a larger population, which may affect baseline service volumes and statutory responsibilities.
Growth in 65+ population (2026–2030)[41]	**+2.32%**	+2.39%	+2.26%	Gloucestershire overall faces a challenge in relation to a population ageing faster than national averages, raising considerations around potential future supply for long-term care.
Growth in 0-19 population	**Declining**	Neutral	Declining	The West may see declining demand pressures on school places in the future.

Table 5: Demographic comparison

Financial Resilience and Income Base

This table compares financial indicators across the regions, offering insight into household income levels and the fiscal position of each area, to assess long-term financial sustainability.

Measure	Glos.	East	West	Implications
Gross disposable household	£23,527	£26,149	£21,191	Residents in the East have higher disposable income.

[41] Population projections, 2022, ONS

income per capita[42]				
Council debt per capita (2023/24)[43]	£819	£674	£948	The West would be created with a higher per-resident council debt burden*, potentially impacting its financial sustainability. **General fund not Housing Revenue Account (HRA)*
Net assets per individual[44]	£1,454	£1,810	£1,137	The East would hold significantly more assets per resident, offering greater long-term financial flexibility.

Table 6: Financial indicators comparison

Service Demand and Social Vulnerability

This table highlights variations in social care spending and indicators of vulnerability, helping to identify areas with greater baseline need and potential service demand.

Measure	Glos.	East	West	Implications
Adult social care spend per resident[45]	£522	£405	£629	Adult social care spend per resident would be significantly higher in the West.
Children's social care spend per resident[46]	£142	£129	£156	Children's social care spend per resident would be higher in the West.
Children in low-income families (per 100k)[47]	14,594	12,274	16,609	The West has a much higher rate of child poverty, potentially requiring it to provide more targeted early help and support.

[42] GDHI Per Capita, 2022/2023, Nomis
[43] LA Debt per capita, 2023/2024, GOV.UK
[44] Net Assets Per Capita, 2023/2024, District Councils
[45] ASC Spend per resident, 2024, Newton
[46] CSC spend per resident, 2025, Newton
[47] Children in Low Income Families per 100k, 23/24, DWP

Household benefit claim rate[48]	15.82%	13.8%	17.9%	The West has a larger proportion of residents reliant on benefits, potentially indicating higher baseline need.
Deprivation index score (higher = worse)[49]	15.1	12.7	17.2	Deprivation is significantly higher in the West, potentially driving greater demand on multiple services.

Table 7: Social care spending and indicators of vulnerability comparison

Economic Activity and Infrastructure

This table examines differences in employment, productivity and digital infrastructure, providing context for economic performance and access to opportunity.

Measure	Glos.	East	West	Implications
Job density (jobs per working-age person)[50]	0.9	1.0	0.8	The East has a more active labour market, potentially creating better access to employment and economic mobility.
Gross value added[51]	£39.0	£41.9	£35.7	Productivity is higher in the East, potentially reflecting a stronger economic base.
Business growth rate[52]	-0.1	+1.1%	–1.2%	The East has seen modest growth in its business base, while the West has experienced decline; this is likely to be localised to the Forest of Dean.
5G availability (% area covered)[53]	68.0%	58.1%	83.0%	The West outperforms the East in mobile coverage,

[48] Household benefit claim rate, 23/24, GOV.UK
[49] Deprivation, 19/20, MHCLG
[50] Job Density, 23/25, ONS
[51] GVA per hour worked, 22/23, ONS
[52] Business Growth (%), 23/24, ONS
[53] % of High Digital Connectivity, 24/25, OFCOM

				reflecting the larger rural footprint in the East.

Table 8: Employment and productivity comparison

Implications for Reorganisation

The baseline differences between East and West highlight demographic and economic imbalances that will shape the financial operating environment for either council that would be created in a two unitary authority scenario:

- A **single unitary authority (1UA) scenario** would need to manage these variations internally, redistributing resources and planning across areas with different levels of income, need, and growth.
- A **two unitary authority (2UA) scenario** would crystallise the variations between East and West, requiring each council to plan for its own financial and service challenges from Vesting Day, with a smaller scale of internal pooling of risk.

Criteria Analysed

This analysis is structured around nine criteria; these include six statutory criteria issued by the Ministry of Housing, Communities, and Local Government (MHCLG), and three additional criteria that reflect Gloucestershire's local priorities and values (criteria 7-9).

Each criterion has been broken down into sub-criteria to allow structured assessment across both models. We have assessed how 1UA and 2UA would potentially perform at the point of implementation and over time.

Only those elements of the published ministerial criteria which are relevant to a RAG (red, amber, green) rating and comparative analysis in Gloucestershire are included in the tables below. In most cases we have summarised the full text of the criteria.

KEY	**MHCLG criteria**	
	Gloucestershire-specific criteria	

1	**Sensible single tier of local government** This criterion assesses whether the model removes two-tier governance, creates a coherent single-tier structure,	A) Establishes a single tier of local government for the whole of the area concerned
		B) Sensible economic breakdown, with a tax base which does not create undue inequalities

	and reflects a logical financial and spatial footprint.	C) Sensible geographic breakdown, which will help increase housing supply and meet local needs
2	**Right-sized local government** This criterion assesses whether the model is large and resilient enough to deliver effective government. It considers population size, potential for efficiency, organisational capacity, and the complexity of transition.	A) A population of 500,000 or more (unless specific local factors make this unreasonable)
		B) Supports efficiencies and value for money for council taxpayers
		C) Improves capacity and supports the council to withstand financial shocks
		D) Manageable transition costs
3	**High quality, sustainable services** This criterion assesses whether the model supports effective, long-term service delivery. It considers integration, transformation potential, and the ability to improve outcomes in complex, high-need areas.	A) Improves local government and service delivery, avoiding unnecessary service fragmentation
		B) Opportunity for public service reform including where this will lead to improved value for money
		C) Improves delivery of, or mitigates risk of negative impact on, crucial services
4	**Meets local needs** This criterion assesses whether the model responds to the needs, identities, and priorities of local communities. It considers civic identity, community variation, and responsiveness to engagement.	A) Meets local needs and is informed by local views
		B) Improves / mitigates risk to issues of local identity, cultural, and historic importance
		C) Addresses local concerns
5	**Supports devolution arrangements** This criterion tests whether the model supports Gloucestershire's ability to unlock devolution powers and funding, and whether it creates a strategic authority footprint with appropriate population scale, coherence, and alignment to regional structures	A) Helps to support devolution arrangements / unlock devolution
		B) Sensible population size ratios between local authorities and any strategic authority
6	**Local engagement and empowerment**	A) Enables stronger community engagement

	This criterion assesses whether the model can support stronger local democracy and provide practical tools for neighbourhood-level decision-making.	B) Delivers genuine opportunities for neighbourhood empowerment
7	**Environmental and climate protection** This criterion assesses whether the model strengthens the council's ability to lead on climate and environmental goals.	A) Ensures the new authority / authorities have clear capabilities to deliver existing and future climate and nature plans
		B) Reflects local priorities in areas with sensitive landscapes (e.g. Forest of Dean, Cotswolds AONB)
		C) Builds on existing commitments (e.g. Fairer Greener Forest, Climate Emergency responses)
8	**Civic engagement and participative democracy** This criterion assesses whether the model provides meaningful democratic representation at community level.	A) Promotes civic engagement and strengthens participative democracy
9	**Inclusive growth and equity** This criterion assesses whether the model enables inclusive economic development, supports vulnerable residents, and maintains service levels while pursuing financial sustainability.	A) Tackles disparities in wealth, employment, and service access
		B) Prioritises vulnerable residents and community-level regeneration
		C) Ensures that financial sustainability is not achieved at the expense of service levels

Each option has been consistently assessed against these nine criteria. RAG ratings have been used to summarise alignment and are supported by detailed commentary.

Scoring Method

To support comparison between the two options, this analysis uses a structured **Red–Amber–Green (RAG) rating system**.

The RAG system provides a simple, visual way to understand how well each option aligns with each criterion and sub-criterion.

Rating	Meaning
G	Meets the criteria
A	Partially meets the criteria / could meet the criteria, with mitigations

R	Does not meet the criteria

- Ratings are applied to each **sub-criterion.**
- No weighting is applied; all criteria are treated equally.
- Each rating is accompanied by narrative commentary, drawing on qualitative and quantitative evidence, if available

Evidence Base

This analysis applies a structured, consistent approach to assess how well each reorganisation model aligns with the nine agreed criteria.

The analysis draws on a wide evidence base, as outlined below, bringing together quantitative analysis, professional insight, and stakeholder perspectives. Evidence has been applied consistently across both models to support an impartial and transparent comparison.

Phase 1 options analysis (completed as part of the interim plan submission in March 2025)

- Developed the original RAG scoring framework used in this analysis.
- Set out the early comparison of structural options based on feasibility, financial scale, and policy alignment.
- Established baseline assumptions around governance design, service footprint, and transition cost implications.
- Informed the scoring approach and structure of commentary.

Demographic and Economic Analysis

- Provided a detailed comparison between the proposed East and West Gloucestershire councils, across:
  - Population trends and age profiles.
  - Financial resilience (e.g. council tax base, gross disposable household income (GDHI), debt levels).
  - Demand for adult and children's social care.
  - Deprivation, employment, and digital access.
  - Economic activity and infrastructure.
- Highlights the different starting points for each authority under a 2UA model, and the internal variation that a 1UA model would need to manage.
- Forms the main statistical evidence base used throughout this options analysis.

Service-level disaggregation and aggregation discussions

- Provided detailed, operational insights from service leads across core upper and lower tier services including (but not limited to): adults, children's and education, transport, revenues and benefits, housing, leisure, and parking.
- Considered issues including:
    - Shared systems and data platforms (e.g. Liquidlogic, Capita, Uniform).
    - Workforce and statutory leadership duplication.
    - Locality delivery and place-based presence.
    - Contracting, service level agreements (SLAs), and external provider arrangements.
    - Gloucestershire-specific practical and technical issues

Stakeholder engagement feedback

- Reflective of responses from partners involved in local services and governance.
- Provided insight into perceptions of:
    - Strategic leadership.
    - Democratic representation and identity.
    - Integration of housing, care, and place-based services.
- Helped assess both models against criteria related to public engagement, identity, and local responsiveness.

Overall Summary of Options Analysis

Summary of Option 1: Single Unitary Authority (1UA)

This option would replace the current two-tier council system with one single council for all of Gloucestershire's ~659,000 residents. This is a size that's been successful in other areas like North Yorkshire and meets government guidelines. Having one council means **decisions can be made more quickly and clearly** and **the county can speak with one voice** when it comes to funding, transport, and big projects.

A 1UA maximises opportunities to retain existing county-wide systems and services (like core service case management systems), which **minimises the cost and disruption associated with splitting things up and any potential duplication.** This is especially important for services like adults' social care (ASC), children's (CSC) social care, special educational needs and disabilities (SEND), and safeguarding, where **keeping teams and systems together helps protect and maximise service continuity for the most vulnerable people across the county.**

Local services would still be shaped around communities, in line with the proposed locality arrangements for Gloucestershire. This includes local partnerships and

boards, budgets that are managed locally, and retaining local identity through ward names, events, and branding.

There are differences between the east and west of the county, e.g. in income levels, spending on ASC, and levels of deprivation. With 1UA, **financial resources are pooled and can be shared and targeted where they're needed most** - increasing overall financial resilience (noting there are still unknowns around the dedicated schools grant deficit and fair funding which impact all LGR options being considered).

The main risk is around ensuring that local voices are heard from the start – this can be managed by setting up strong local governance early on.

Summary of Option 2: Two Unitary Authorities (2UA)

The 2UA model **prioritises local visibility, civic identity, and flexibility** by creating two councils based on existing district clusters: East (~310k) and West (~348k). Smaller footprints (in comparison with a 1UA) may make members and officers seem more accessible, which some stakeholders, especially parish councils, may see as a strength.

However, the model introduces significant **duplication and disaggregation challenges**. Systems like Liquidlogic, SAP, and Capita One would need to be split or reprocured; safeguarding boards, SEND services, and commissioning frameworks would require parallel governance. Service leads warned this could increase cost, slow transformation, and risk divergence in quality or access. The Fire and Rescue Service in a 2UA model would be legally required to disaggregate from local authority structures and finances, creating additional cost and risk.

The West's higher demand (particularly in relation to social care services) and lower income could constrain its investment capacity without sustained external funding and there may be concerns around longer-term financial sustainability for the West UA (with current estimates projecting a c.£21.9m deficit on day one).

Like the 1UA, local services would still be shaped around communities, in line with the proposed locality arrangements. This includes local partnerships and boards, budgets that are managed locally, and keeping local identity through ward names, events, and branding.

Comparative (RAG) scoring summary by **main criteria**

Criteria	1UA	2UA
1. Sensible single tier of	• Creates a single tier of local government.	• Creates a single tier of local government.

local government	• Enables pooled resources and redistribution to address potential imbalances countywide, e.g. in homelessness and housing supply. • Aligns with existing partner boundaries.	• Similar tax bases across both UAs but potential fiscal disparities in LA debt (£ per capita (23/24) of £948 in West compared to £674 in East) and service cost (ASC spend per resident of £405 in East vs £629 in West).
2. Right-sized local government	• Exceeds MHCLG expected population threshold of 500,000 (1UA population is ~659,000). • Economies of scale across a single larger UA. • Improved capacity and resilience (financial and workforce). • Lower transition costs (one-off costs ~£21.3 million).	• Meets viability threshold of 300k but below 500k (East: ~315,349, West: ~354,031). • Reduced duplication across lower tier services; duplication of upper tier services. • Opportunities to put in place targeted shared service arrangements. • Higher transition costs (with two programmes, one-off cost ~£30.1 million).
3. High quality, sustainable services	• Maintains integrated ASC, CSC, and public health. • Innovation opportunities at scale. • Protects multi-agency safeguarding and Multi-Agency Safeguarding Hub (MASH) arrangements.	• May fragment countywide services which could cause challenges with quality and cost of service delivery e.g. ASC, CSC, public health etc. • Fire and rescue will need to move to a non-local authority governance, financial, and service arrangement (i.e. the creation of an independent fire and rescue authority), which will incur additional costs (estimated to be c.£2.8m net total additional pressure for year one) and may increase risk of sustainable service provision.
4. Meets local needs	• Local stakeholder support for retaining single voice and shared infrastructure. • Concerns around merging distinct local identities. • Perception of overcentralisation, which can be	• Builds on existing district boundaries. • Retains a sense of place identity for the two largest urban centres (Cheltenham and Gloucester) but could risk alienating other more rural areas.

	managed with continued place-based delivery.	• Risks financial imbalance in West which could compromise ability to meet local needs.
5. Supports devolution arrangements	• Simplifies engagement with partners. • Increased scale and negotiating influence. • Meets 1.5m Combined Authority (CA) population benchmarks.	• Allows tailored devolution asks. • Each UA could join different CAs. • Some scenarios risk falling below 1.5m population benchmark.
6. Local engagement and empowerment	• Can deliver countywide engagement structures. • Embeds neighbourhood partnerships consistently. • Needs deliberate design to avoid remoteness.	• Smaller footprints could improve councillor visibility. • As for 1UA, effective engagement depends on deliberate design.
7. Environmental and climate protection	• Countywide environmental plans, but with the ability to still retain tailored, local strategies where needed. • Unified stewardship of landscapes. • Scales up local climate initiatives.	• Ability to still retain tailored, local strategies where needed. • Retain joint governance for shared assets.
8. Civic engagement and participative democracy	• Scales up digital tools and participatory decision-making countywide. • Risk of democratic deficit.	• Two smaller councils could feel more accessible, with closer member-resident link in comparison with a 1UA. • Risk of democratic deficit.
9. Inclusive growth and equity	• Increased countywide resilience to drive growth and equity. • Unified regeneration. • Consolidation savings can be reinvested back into front line service delivery.	• Potential risk or difficult decisions needed in the West if current demand and cost trajectories for ASC continue.

Summary of Options Appraisal Against Criteria and Sub-Criteria

This section sets out a summary view of the options appraisal against the six MHCLG criteria and three additional local context criteria and sub-crtieria; with ratings in RAG format providing a simple, visual way to understand how well each

option aligns with each criterion and sub-criterion. A more detailed description against each sub-criteria can be found in Appendix 5: Detailed Options Analysis.

When assessing each option against the MHCLG criteria, we note that the potential impact of the government's fair funding review remains unknown. This creates a degree of uncertainty for both options, as future funding allocations could materially affect relative financial sustainability and capacity. As a result, no definitive assessment of fair funding implications has been included within the criteria analysis for either the 1UA or 2UA option.

This options analysis has been prepared based on the current Gloucestershire boundaries. No boundary changes have been proposed or modelled at this stage. Any suggested boundary modification could significantly alter population totals and financial profiles, which in turn would affect assessment against several criteria and may change the RAG ratings presented.

Comparative (RAG) Scoring Summary by **Main Criteria and Sub-Criteria**

Criterion	Sub-criterion	1UA		2UA (East / West)	
1. Sensible single tier of local government	A) Establishes a single tier of local government for the whole of the area concerned	**G**	• Removes two-tier structure and creates one accountable body.	**G**	• Removes two-tier structure and creates two accountable bodies in a single tier.
	B) Sensible economic breakdown, with a tax base which does not create undue inequalities	**G**	• Allows pooled resources and supports appropriate redistribution from East to West.	**A**	• 2024 tax base (band D equivalents after council tax support) suggest similar tax bases across both authorities (49% in the West and 51% in the East) with clear sectoral priorities to drive economic growth within each UA. • However, there are potential fiscal disparities in LA debt (£ per capita (23/24) of £948 in West compared to £674 in East) and service costs, particularly in ASC (spend per resident of £405 in the East vs £629 in the West).
	C) Sensible geographic breakdown, which will help increase housing	**G**	• Aligns with existing partner geographies e.g. NHS, ICB, police etc and enables strategic planning to address disparities in housing needs and land supply across different parts of the county (five-year housing supply	**A**	• Misalignment of boundaries with key partners incl. the ICB, police, and fire and rescue. • Variations in homelessness (higher in the West at 0.21% vs 0.11% in the East) and

Criterion	Sub-criterion	1UA		2UA (East / West)	
	supply and meet local needs		target is 4.97 years for East and 3.83 years for West, with a countywide shortfall of 4.37 years).		housing land supply (lower in the West at 3.83 vs 4.97 in East). This could result in more demand for housing in the West with less supply to meet this efficiently within the new UA borders. • Average house prices illustrate that the private housing market faces greater challenges in the West, where values are lower (e.g. Gloucester £225,000; Forest of Dean £291,000) compared to the East (e.g. Cotswolds £419,000; Cheltenham £324,000), reducing profit margins and making it less likely that the private sector will deliver sufficient supply without public intervention.
2. Right-sized local government	A) A population of 500,000 or more (unless specific local factors make this unreasonable)	**G**	• Serves ~659,000 people, meeting MHCLG's expected population threshold of 500,000.	**A**	• Both councils exceed 300,000 (minimum viability threshold is met) but fall below the MHCLG preferred 500,000 (East: ~315,349, West: ~354,031).
	B) Supports efficiencies and value for money for council taxpayers	**G**	• Opportunities for economies of scale e.g. across smaller specialist contracts for services such as cyber and asbestos and	**A**	• Reduced duplication of lower tier services and improved coordination between areas such as transport, housing, and regeneration.

Criterion	Sub-criterion	1UA		2UA (East / West)	
			increased market influence to enable market management. • Delivery of potential net revenue savings from reorganisation of ~£21.1m per annum.		• However, duplication of countywide service infrastructure e.g. two statutory officers for CSC, two core systems for CSC etc will add in additional costs. • Delivery of potential net revenue savings from reorganisation of ~£10.7m per annum (split as ~ £4.9m for the East, and ~ £5.8m for the West).
	C) Improves capacity and supports the council to withstand financial shocks	**G**	• Enables pooling of specialist professional resource to allow for flexible deployment across the county. • Improves financial resilience to manage imbalances in demand and cost between different areas in the county. • Services like ASC and CSC are preserved in their current state with senior capacity maintained and increased workforce resilience. • Current financial analysis indicates that a 1UA for Gloucestershire would be established with a balanced budget on day one. This assumes the full delivery of unidentified savings required by all seven councils between now and vesting day (1	**A**	• Opportunities to continue operating shared service arrangements in a targeted way to drive efficiencies and provide an increased number of senior officers, potentially resulting in increased capacity. • However, potential significant financial burdens for the West in relation to ASC (around the demand and cost of working age adult placements). • Current financial analysis indicates that the East council in a 2UA scenario would be established with a day one general fund surplus of ~ £21.9m. Whilst a West council would be established with a day one general fund deficit of ~ £21.9m. This assumes the full delivery of unidentified

Criterion	Sub-criterion	1UA		2UA (East / West)	
			April 2028) and does not fully account for the impact of the fair funding review (subject to further detail from government).		savings required by all seven councils between now and vesting day (1 April 2028) and does not fully account for the impact of the fair funding review (subject to further detail from government).
	D) Manageable transition costs	**G**	• Requires creation of only one new authority and legal structure, minimising transition costs - estimated to be ~£21.3m. (Based on the assumption of a continuing authority). • This includes lower costs of systems migration e.g. no need to split out or duplicate existing countywide systems such as Liquidlogic; lower costs of statutory senior officer roles as only one set of roles is required; lower costs of setting up two separate implementation portfolios to manage transition etc.	**A**	• Higher transition costs as governance and activities would need to be undertaken twice – currently estimated at ~ £30.1m. • Specific examples of additional costs incurred include the recruitment of two sets of statutory officer roles, the increased costs of disaggregation of core county wide services and systems, the costs of setting up two shadow authority structures.
3. High quality, sustainable services	A) Improves local government and service delivery, avoiding unnecessary service fragmentation	**G**	• Preserves current integrated delivery in ASC, CSC, transport, and public health. • Also results in minimal disruption to current multi-agency partnership arrangements. • There may be challenges in delivering quality services across such a diverse	**A**	• Opportunities to potentially strengthen local partnerships with organisations within each area. • Services that require aggregation will have a simpler journey as East / West will each aggregate from three districts into one.

Criterion	Sub-criterion	1UA		2UA (East / West)	
			geography, but continued strong locality working can help to mitigate this. • This involves the aggregation of six councils into 1UA, which is likely to be complex and costly e.g. alignment of different policies etc.		• However, a 2UA will result in the likely disaggregation of core countywide services including ASC, CSC, education, transport, public health, trading standards, and libraries which could result in financial viability considerations (e.g. in ASC given the imbalance in demand and cost) as well as variations in service delivery and offer (e.g. in relation to public health services). • Under the provisions in the Fire and Rescue Services Act 2004, fire and rescue will need to move to non-local authority governance, financial, and service arrangement (i.e. the creation of an independent fire and rescue authority), which will incur additional net costs (estimated to be c.£2.8m additional pressures on day one for the new councils) and may increase risk to sustainable service provision.
	B) Opportunity for public service reform, including instances where this will lead to	**G**	• A larger organisation will have increased scale, resilience, and influence in working with local and national partners, driving longer-term improvements including the creation of a single trusted front door for	**A**	• Enables each council to innovate locally and make targeted investments in line with local priorities with greater agility and easier implementation, but at a potentially

Criterion	Sub-criterion	1UA		2UA (East / West)	
	improved value for money		residents, a single data platform to drive prevention and early intervention, and the ability to innovate at scale quickly. • For example, in areas like health and social care, a single larger organisation is likely to have a stronger voice and influence as part of the ICB in comparison with smaller organisations.		reduced scale compared to countywide delivery.
	C) Improves delivery of, or mitigates risk to, negative impact on crucial services	**G**	• Allows flexible resource allocation across the county, directing investment to areas of highest demand such as ASC and CSC in the West. • Consistent service standards for countywide functions. • Preserves MASH arrangements and avoids artificial borders that could disrupt education and care placements.	**A**	• Disaggregating core services such as education, SEND, admissions, and safeguarding systems risks disrupting end-to-end care pathways, hospital discharge, and home-to-school transport.
4. Meets local needs	A) Meets local needs and is informed by local views	**A**	• Findings from local engagement undertaken with Gloucestershire residents in July 2025 indicated that 205 out of 225 residents (who had a view on local government structures) preferred a 1UA for Gloucestershire.	**A**	• Findings from local engagement undertaken with Gloucestershire residents indicated that 14 out of 225 residents (who had a view on local government structures) preferred a 2UA model. However, concerns were raised in broader qualitative

Criterion	Sub-criterion	1UA		2UA (East / West)	
			• Parts of the county's strategic partner base (NHS, police, business networks) and the VCFSE emphasised that a single accountable body could also simplify engagement and reduce duplication across multiple districts. However, some parish councils and VCFSE groups raised concerns that this needs to be supported by robust locality governance so that a 1UA does not feel more distant, especially in rural areas. • The 1UA model reflects existing countywide delivery of ASC, CSC, public health and transport, noting that service leads supported retaining local operational footprints even under this arrangement.		commentary around fairness, division, and efficiency, with references to "creating a rich side and a poor side of the county". • Concerns were raised around large urban centres within each unitary dominating focus and resources, potentially leading to rural areas receiving a lower standard of service. • Risks include fragmentation where communities span boundaries or rely on countywide networks (e.g. education, safeguarding, housing). • Parts of the VCFSE warned that splitting the county may marginalise rural transition areas such as the Severn Vale and North Cotswolds.
	B) Improves / mitigates risk to issues of local identity, cultural and historic importance	**A**	• Civic identity kept through 267 parish councils, new city / town councils for Gloucester and Cheltenham, and use of local names and branding. • Neighbourhood partnerships (30k–50k population) bring decision-making closer to communities and build on existing local networks.	**A**	• Aligns with current district geographies. • Equalities impact assessment (EqIA) analysis shows differing community profiles: East combines Cheltenham's urban diversity with older rural areas, while West combines Gloucester's ethnic diversity with rural Forest of Dean and Stroud communities.

Criterion	Sub-criterion	1UA		2UA (East / West)	
			• Area-based practice in ASC / CSC and precedents from other unitaries show local visibility can be maintained under a 1UA model. • Local engagement with residents raised concerns that a unitary authority may not recognise the individual places that have their own unique identity. For example, residents spoken to at the Coleford Music Festival wanted to maintain the identity of the Forest of Dean as a unique place.		• However, several stakeholders noted that smaller authorities don't necessarily directly correlate with improved community engagement – the underlying structures and design are crucial to success. • Findings from local engagement with residents also highlighted that it could be difficult to create local identities for each unitary that do not revolve around the largest towns which would exclude other areas.
	C) Addresses local concerns	**A**	• Risk of overcentralisation can be mitigated by strong locality governance and retaining local delivery (e.g. social work teams). • A 1UA enables countywide planning to address inequalities (e.g. child poverty, which is higher in West) while flexibly allocating resources by place. • Unified capital and housing functions allow targeted investment in local priorities, such as brownfield regeneration in the West and transport access in the East.	**A**	• The West faces greater cost pressures due to higher deprivation (indices of deprivation - East: 12.71, West: 17.16); higher ASC costs per resident (East: £405, West: £629); and higher claimant rates (East: 13.79%, West: 17.87%). • Cross-boundary issues (e.g. housing, transport, tech corridors, flood risk) require joint working, limiting full localisation. • Unified capital and housing functions allow targeted investment in local priorities, from brownfield regeneration in the West to transport access in the East.

Criterion	Sub-criterion	1UA		2UA (East / West)	
5. Supports devolution arrangements	A) Helps to support devolution arrangements / unlock devolution	**G**	• Gives Gloucestershire a single, unified voice in national negotiations. • Streamlined governance and one point of entry improve clarity for partners and enhance the county's profile when securing investment and funding. • Unified leadership supports countywide priorities such as housing, infrastructure, skills, and transport, while preserving links to both the South West and West Midlands regional partnerships.	**A**	• No single voice for Gloucestershire overall which could weaken influence in negotiations but there may be improved opportunities for each authority to tailor devolution asks based on distinct priorities. However, there is limited evidence to support this.

	B) Sensible population size ratios between local authorities and any strategic authority	**G**	• Population sizes for potential combined authority options being considered for Gloucestershire just about meet the minimum 1.5m benchmark set by government as illustrated by the combined population estimates below:
			  ○ Gloucestershire + WECA Core: 1.6m
			  ○ Gloucestershire + WECA (incl. North Somerset): 1.81m
			  ○ Gloucestershire, Herefordshire and Worcestershire: 1.45m (falls a little short of the 1.5m threshold).
				G	• Opportunities for each UA to join potentially different combined authorities due to potential political divergence.
					• Two smaller Gloucestershire authorities would cause concerns around meeting the minimum 1.5m benchmark in all potential combined authority scenarios, e.g. Herefordshire and Worcestershire have a combined population of c.806,000 so if only one of the Gloucestershire authorities was to form a combined authority with these two areas, this would fall short of the minimum

Criterion	Sub-criterion	1UA		2UA (East / West)	
			○ Gloucestershire, Oxfordshire + Swindon: 1.63m • However, concerns were noted around the relative size of a single Gloucestershire unitary authority in comparison with other partners in a combined authority. For example, in the case of a WECA option, Gloucestershire would be the largest partner in WECA, with a population of c. 659,276, compared to Bristol's c.472,400, South Gloucestershire's c.290,400 and Bath and North East Somerset's c.193,400 (population figures based on ONS 2021 census). This could potentially make a single unitary less appealing for other partners.		1.5 million threshold (at a maximum, it would be c.1.2m). • In terms of relative size of two smaller Gloucestershire authorities compared with potential partners, this may be more palatable. The populations of c.300,000-350,000 for Gloucestershire would not be significantly higher than potential partners, particularly in the case of a WECA option.
6. Local engagement and empowerment	A) Enables stronger community engagement	**G**	• A 1UA removes districts but can create countywide frameworks for neighbourhood partnerships, reducing duplication and clarifying responsibilities. • Effective engagement depends on deliberate design; partners stressed the need to "build in real localism" to avoid perceptions of distance.	**G**	• Smaller footprints could improve councillor visibility and allow warding and committees to reflect local settlement patterns. • Effective engagement depends on deliberate design; partners stressed the need to "build in real localism" to avoid perceptions of distance.

Criterion	Sub-criterion	1UA		2UA (East / West)	
			• The 1UA model generates the largest potential reorganisation savings (c.£21.1m annual net savings), creating capacity to invest in local forums co-designed with partners including the Office of the Police and Crime Commissioner (OPCC), ICB, and the VCS Alliance.		• Service leads stressed that effective engagement depends on design, resources, and authority, not size alone.
	B) Delivers genuine opportunities for neighbourhood empowerment	**G**	• A 1UA can formalise locality governance through neighbourhood partnerships and area committees, co-designed with communities and partners – noting it may be difficult on such a large footprint (OPCC, ICB, VCS Alliance). • Existing hubs and parish clusters can be aligned to locality areas, ensuring services like ASC, CSC, and planning remain close to residents, while using shared systems and standards countywide. • Concerns have been raised that removing levels of government risks democratic deficit.	**G**	• A 2UA can formalise locality governance through neighbourhood partnerships and area committees, co-designed with communities and partners – noting it may be difficult on such a large footprint (OPCC, ICB, VCS Alliance). • Concerns have been raised that removing levels of government risks democratic deficit.
7. Environmen	A) Ensures the new authority has /	**G**	• Countywide plans and partnerships on climate, nature recovery, and flood risk (e.g.	**G**	• Strategic collaboration could continue through Climate Leadership

Criterion	Sub-criterion	1UA		2UA (East / West)	
tal and climate protection	authorities have clear capabilities to deliver existing and future climate and nature plans		Climate Strategy, Local Nature Recovery Strategy (LNRS), Lead Local Flood Authority (LLFA) role) continue seamlessly under a 1UA. • Scale enables coordinated budgets, specialist teams, and single ownership of assessments and bids, strengthening capacity for investment and delivery. • Neighbourhood partnerships embed environmental priorities locally, supporting community-led climate and nature actions.		Gloucestershire, but duplication of plans and scrutiny would add cost. • Requires countywide coordination on cross-boundary issues (which can continue to build on the success of partnerships such as Climate Leadership Gloucestershire). • The smaller scale of two unitary authorities should not have an adverse impact on the effectiveness.
	B) Reflects local priorities in areas with sensitive landscapes (e.g. Forest of Dean, Cotswolds AONB).	**G**	• Maintains single local plan, LNRS, and biodiversity net gain framework, avoiding fragmented policies across natural assets and landscapes. • Supports countywide coordination of infrastructure, flood schemes, and biodiversity corridors while retaining local tailoring through the proposed locality arrangements. • Provides consistent planning approach on issues like nutrient neutrality, with parish and community networks shaping local priorities.	**G**	• Local initiatives such as Cheltenham's Net Zero Plan and Fairer Greener Forest could be advanced under separate leadership.

Criterion	Sub-criterion	1UA		2UA (East / West)	
	C) Builds on existing commitments (e.g. "Fairer Greener Forest", Climate Emergency responses).	G	• Local climate programmes (e.g. Fairer Greener Forest, Stroud Climate Action Network (CAN), Cheltenham net zero) can continue with countywide support, funding and systems. • A 1UA enables one climate plan, shared datasets, and a single scrutiny framework to align priorities and track delivery. • Some partners highlighted through engagement that 1UA simplifies collaboration, supporting targeted investment in rural, urban, and flood-risk communities.	G	• Two councils could retain and develop existing local climate plans, keeping accountability close to members and communities. • Local ownership may strengthen engagement, but alignment is needed on countywide priorities like emissions, transport decarbonisation, and biodiversity.
8. Civic engagement and participative democracy	A) Promotes civic engagement and strengthens participative democracy	A	• Countywide engagement tools and resident panels can be delivered at scale, avoiding duplication across districts. • A single framework protects equal access to participation for both rural parishes and urban neighbourhoods. • Builds on local co-design pilots and VCFSE partnerships, enabling grassroots leadership within a countywide democratic structure.	A	• Both authorities would be able to develop civic engagement strategies suited to their geographies and communities. • Smaller councils could feel more accessible to residents, with closer member–resident links. • Given LGR will reduce the number of elected councillors and create larger electoral divisions, this will increase the number of residents each councillor

Criterion	Sub-criterion	1UA		2UA (East / West)	
			• Given LGR will reduce the number of elected councillors and create larger electoral divisions, this will increase the number of residents each councillor represents. This could risk a democratic deficit.		represents. This could risk a democratic deficit.
9. Inclusive growth and equity	A) Ability to tackle disparities in wealth setting up one unitary authority or two unitary authorities	**G**	• A 1UA enables countywide planning and pooled resources to tackle disparities, targeting regeneration in areas with lower GDHI, job density, and higher deprivation (notably in the West). • Avoids postcode inequality by ensuring consistent access to services and funding across the county. • Strengthens Gloucestershire's case for levelling up and national investment by presenting one accountable body.	**A**	• Lack of countywide redistribution may leave the West struggling with higher deprivation (East: 12.71, West: 17.16) and demand pressures (e.g. ASC costs per resident East: £405, West: £629 and Adults with no qualifications East: 13,375 per 100,000, West: 16,169 per 100,000). • Risks include divergence in neighbourhood regeneration and reduced ability to deliver countywide programmes to close equalities gaps.
	B) Prioritises vulnerable residents and community-level regeneration	**G**	• Shared datasets enable consistent targeting of unmet need (e.g. higher child poverty rates in the West). • Countywide safeguarding boards and integrated commissioning are retained, while services continue to deliver locally	**G**	• The West may face difficulty funding high-need regeneration without redistribution, exposing resource and commissioning gaps. However, funding may become more readily available to the West as their relative deprivation would no longer be

Criterion	Sub-criterion	1UA		2UA (East / West)	
			through hubs, schools, and VCSFE partners. • A 1UA simplifies cross-cutting delivery (e.g. mental health, housing, substance misuse) and links neighbourhood action plans to countywide priorities.		hidden by the averages of the West and East combined.
	C) Ability to balance financial sustainability with service levels	**A**	• Consolidation of contracts, systems, and infrastructure delivers savings in back-office functions, allowing reinvestment in frontline and preventative services. • A single commissioning function strengthens market position in areas such as ASC and SEND, reducing fragmentation and securing better value. • Countywide reserves and income provide flexibility to sustain high-cost services and manage financial risk across the whole area. • Countywide dedicated schools grant (DSG) deficit projected to reach ~£234m by vesting day (1 April 2028). If statutory override is not maintained or an alternative solution implemented, then both a 1UA and 2UA would face significant financial risks.	**A**	• Each authority would have its own independent medium term financial strategy (MTFS) and budgets which can be aligned with local service priorities. • The West faces higher ASC demand and costs (ASC costs per resident East: £405, West: £629) and CSC costs (CSC costs per resident East: £129, West: £156), creating greater budget pressure without access to countywide reserves or subsidy. • Countywide DSG deficit projected to reach ~£234m by vesting day (1 April 2028). If statutory override is not maintained or an alternative solution implemented, then both a 1UA and 2UA would face significant financial risks. • The impact of the fair funding is currently unknown, presenting further financial

Criterion	Sub-criterion	1UA	2UA (East / West)
		• The impact of the fair funding review is currently, presenting further financial uncertainty to both 1UA and 2UA scenarios.	uncertainty to both 1UA and 2UA scenarios.

The New Councils: Future Operating Model

LGR is a chance to reshape how councils in Gloucestershire work. To deliver better, more sustainable services and tackle inequalities, **clear and consistent future operating models (FOM) are essential.**

This section outlines how the new councils could engage with residents, collaborate with partners, and operate internally. While the final model will be decided by future council leaders, this proposal offers **a framework to support long-term resilience, local decision-making, and community-focused service delivery.**

Our Opportunity to Modernise

Gloucestershire is in a unique position – ready to harness its strengths whilst fundamentally transforming to address some its challenges, ultimately improving outcomes and delivery of high-quality services for all residents, businesses, and staff.

Through LGR, the new councils can take advantage of:

- **Simplified access to services making it easier for residents to get the help they need** without having to be passed between councils.
- **A strategic approach to prevention and integration** across social care, public health, environmental health, leisure, housing, and other services. Given Gloucestershire's higher than average ageing population, this approach is key to future demand management and financial sustainability.
- **Opportunities to partner with local organisations.** Gloucestershire already has great foundations to build on – like our place-based family and youth hubs across the county and the Ow Bist Community Hub[54] in Cinderford. Ow Bist is a great example due to its co-designed ethos; the community named the building and shaped its offer, which blends council, health, and VCFSE services.
- Accelerated opportunities for transformation enabled by **shared intelligence and predictive analytics**. Housing and homelessness are an example of how a more integrated operating model can enable more evidence-driven and predictive responses for vulnerable people.
- **Fresh impetus for broader public service reform across Gloucestershire** to address service modernisation, integration, prevention, and demand pressures**.**

[54] www.fvaf.org.uk/owbist

Our Design Principles

We've set out clear design principles to guide every decision behind our FOMs:

- **Values-led:** everything we do will be rooted in clear values and led by outcomes – **doing the right thing for the people of Gloucestershire.**

- **People at the heart:** we're here for all our people, businesses, and communities – everyone is equally valued. We design with people, not for the, **building relationships rooted in listening, trust, transparency, and inclusivity.** Our ambition is to create places and services that actively support wellbeing and happiness, helping everyone to thrive.

- **Locality-focused:** our commitment to localities means **real place-based working, genuine co-production, and enabling community-led delivery.** One size won't fit all, and we will support different places in different ways.

- **Online by default and accessible for all:** our strategic 'online by default' culture maximises the impact of technology, simplifying and automating our processes, with alternative provision where it is desired or needed, so that **nobody is left behind**. And as we innovate, we stay mindful of the environmental and ethical impact of our digital choices.

- **Collective ownership:** we'll drive collective ownership throughout the new councils with a **'one-team ethos'**. This empowers service leads, managers, and staff to make smart, local decisions and adapt quickly to what our communities need most.

- **Partnerships with purpose:** our **partnership working will be purposeful** to make a positive difference to our communities and achieve shared goals. Every delivery model is shaped by what works best for each place, not by a one-size-fits-all approach.

- **Intelligence led decision-making:** We will harness evidence to spot things early, be proactive, influence strategy, and drive meaningful change - using data and insights to improve service delivery and ways of working.

- **A great place to work:** we'll value, train, and care for an agile and resilient workforces, building clear career pathways and enabling development of specialist service experts, multi-skilled individuals, and those that want to move between service areas. We champion **a diverse and inclusive workforces that reflects our communities**, promoting equality, equity, and belonging for all.

Key Components of Our FOMs

With our design principles as our foundation, we're clear about what this means in practice.

Two-way engagement and a first point of contact for residents, businesses, and the community

Each unitary authority could have its own in-house engagement capability but with consistent features:

- Fostering participation and co-creation with neighbourhoods and other communities to encourage genuine partnership working and empowerment; exploring investment in community assets, libraries, and outreach to support place-based access and digital inclusion.
- Wherever possible, ensuring that services feel consistent and connected, powered by shared customer data, especially for those with complex or multiple needs.
- Blending digital self-service and effective triage (enabled by AI, including voice and chat automation) to free up our people to provide higher value, personal services.
- Utilising resident and community demand data and insights to feed neighbourhood and community support, commissioning, and corporate planning, which will allow the councils to use data to drive decisions and improvements.

Bringing together frontline and place-based service delivery for residents, businesses, and communities

There may be some common service delivery features and principles adopted by each authority including:

- High-risk, regulated, and a range of other services are likely to stay in-house (or potentially even be brought in house) to protect quality, value, and flexibility.
- A workforce that blends specialist staff, who understand the technical nuance and risks of frontline services, with flexible, multi-skilled staff, who can provide challenge and strong leadership.
- Visible and responsive services in local areas through place-based forums and outreach which adapts to diverse populations and cultural needs.

- A seamless flow of contact, triage, and resolution into operational teams – with clear service standards and safeguarded pathways for urgent or high-risk cases.

Commissioning in-house specialist capabilities associated with services the councils acquire externally

Each unitary authority could have its own in-house commissioning capability which can commission based on local market conditions and demand / supply in each area. The councils would also seek to:

- Strategic commissioning capabilities to link insight, market knowledge, service needs, and outcomes (aligned to the corporate strategy and community needs).
- Lead with intelligence – using demand, neighbourhoods, and supply insights to drive every decision so that they are outcomes-focused and needs-based.
- Joint working with partners built on trust and shared goals (not necessarily always full-service integration), enabled by strong governance and clear exit strategies.
- An ethos of continuous review and improvement, making sure services remain resident-focused and outcome-driven, encouraging maximum value for money.

Note: An initial view of potential delivery models for core service areas (i.e. commissioned, shared services, in-house), is set out in Appendix 6: Proposed Service Delivery Models (noting that ultimately the final decisions on these will be for the new authorities).

Strategic enablement: driving the councils' strategic direction, transformation agenda, and operational excellence

Each unitary authority will need its own strategic enablement capabilities to lead direction, retain decision-making sovereignty, and deliver on its political and strategic priorities. These teams will help drive:

- Coordination of corporate strategy, transformation, and financial performance to ensure alignment and accountability across the council.
- A robust business partnering model turning strategy into action. Central teams will manage systems, standards, and high-volume transactions, with business partners embedded within or alongside directorates.

- Insight and performance information will flow both ways between services and strategic leadership, enabling real-time learning, smarter resource use, and targeted interventions.
- Investment in the right tools, skills, and culture, pairing data with human judgement and local context to ensure decisions are ethical, inclusive, and effective.
- Outcome-driven performance management – using insight to monitor progress, drive change, and enable services to reach their full potential for residents.

Shared Services Between East and West Gloucestershire

Gloucestershire already leads the way in shared services, delivering consistent, efficient, and cost-effective solutions like waste collection and environmental management across up to eight councils. Where scale, specialist expertise, or infrastructure matter, collaboration just makes sense.

For most children's and adults' social care functions, it is essential that each authority delivers its own services, led by dedicated professionals who know their communities best and are empowered to make decisions locally. High-quality, safe support for vulnerable children and adults depends on clear lines of accountability and strong local leadership - an approach adopted by the vast majority of councils across England because it delivers results. The new authorities may wish to explore shared service models in areas such as:

- **Archives:** splitting physical and digital collections would be costly, disruptive, and face significant legal challenges, with no benefit to residents. A single, shared archive service protects access, quality, and value.
- **Coroners:** Gloucestershire's coroner area boundary is already set by the Ministry of Justice under the Coroners and Justice Act 2009. Keeping a countywide service avoids unnecessary boundary changes and preserves specialist expertise.
- **Registrars:** a shared approach is key to financial resilience, especially with demand varying so widely across the county. Pooling resources ensures a sustainable, high-quality service for all.
- **Waste and environmental services:** the Ubico model already successfully delivers for seven councils. Expanding this shared service across two new authorities will drive even greater efficiency, without compromising on delivery.

Gloucestershire's Shared Waste Services

Ubico Ltd is Gloucestershire's shared environmental powerhouse. delivering frontline services for eight councils, comprising all seven in the county as well as West Oxfordshire. Teckal-compliant and council-owned, Ubico has set the standard since 2011/12 for cost-effective, flexible alternatives to outsourcing.

From waste and recycling collections to street cleansing, fly-tip response, grounds maintenance, fleet management, and even cemetery care, Ubico covers it all. Every service is tailored to local priorities but delivered with the consistency and efficiency only a shared model can offer.

Despite being in a shared service arrangement, each service is tailored to local policies and priorities set by the individual councils across Gloucestershire and West Oxfordshire.

There have been a range of benefits to all councils, including:

- **Cost efficiency** through centralised senior management, support services, fleet management and procurement
- **Consistent, high-quality service delivery** with flexibility for local policy differences
- **Back-office savings** and simplified contract management
- **Operational resilience**, with cross-council support and standardisation
- **Centralised expertise** in environmental service provision, fleet management and maintenance, environmental compliance, service change and innovation, and programme management.

The New Councils: Workforce

The workforce approach builds directly on the strategic ambitions proposed in the FOMs. The new councils' FOMs provide an opportunity to reimagine what it means to work for our councils and to invest in continuing to develop **a diverse, valued, and multi-skilled workforce that represents, and is best placed to service, Gloucestershire's residents and communities.**

By reshaping how we attract, develop, and empower staff, we unlock **greater mobility, clearer career pathways, and the chance to embed a culture of innovation and continuous improvement** across services.

Gloucestershire's Workforce Challenges

Our workforce is talented and dedicated, but we're not immune to the pressures facing local government. LGR is our chance to tackle these challenges head-on and build a workforce that's resilient, inclusive, and future-ready.

- **Recruitment and retention**: stability is impacted by competition for talent, especially in social care, education, and technical roles. To attract and keep the best, we need to offer more than just a job. Flexible working is increasingly expected, and career pathways could better reflect diverse progression routes.
- **Diversity and representation:** there are gaps in workforce diversity, with underrepresentation in some roles and areas. Promoting Gloucestershire's strengths more widely can help attract a broader range of talent.
- **Wellbeing and change fatigue:** staff are under pressure, particularly in middle management and specialist roles. A stronger focus on wellbeing and open communication can help build cultures that embrace change and support growth, ready for what comes next.
- **Skills for the future:** rapid technological change means we must invest in digital and data skills across all roles. Updating job structures and expanding access to learning will help build confident, adaptable workforces ready to lead transformation.

Unlocking New Opportunities for Our Workforce

LGR provides a unique moment to reshape how our councils engage, support, and develop their workforce. By aligning people strategies with the broader transformation agenda, we can unlock new potential and build future-ready organisations.

Through LGR the councils can:

- **Reset organisational culture** by embedding inclusive values, energising teams, and empowering staff to shape services. This fresh start unites colleagues through adoption of new behaviours, attracts new talent, and

creates real ownership and pride, across every corner of Gloucestershire. By putting wellbeing and resilience at the centre, we'll tackle change fatigue and build workforces that are more connected, motivated, and driven by a shared mission.

- **Strengthen recruitment and retention** by reducing internal competition for talent, enabling more flexible resource sharing, and creating clearer pathways for retraining and upskilling. Structural changes, such as refining spans of control and smarter job design, can improve efficiency and clarity - especially important in high-demand areas like social care, education, planning, and technical services. LGR will allows the councils to become more attractive employers, offering rewarding careers and development opportunities.

- **Build skills and capability** by investing in digital literacy, data competence, and shared training – raising standards and opening-up new career routes. We'll close skills gaps in areas like AI, development operations, data analysis, and data engineering, competing with the private sector and positioning the councils as forward-thinking employers, ready to meet future challenges with confidence. And by sharing these skills with wider partners and the community, we'll boost employment prospects and deliver real social value.

- **Support diverse career pathways** by recognising the value of both specialists and generalists and creating structures that reward horizontal and vertical progression equally. Through investing in specialist skills – like commissioning, contract management, market shaping, and quality assurance – we'll help staff feel more valued for their unique strengths and open up fulfilling career journeys within each organisation.

- **Promote workforce diversity and representation** by setting the standard for an inclusive workplace. Addressing persistent gaps in representation and removing cultural and structural barriers in recruitment and progression, we'll build workforces that better reflects the communities they serve and where everyone can thrive.

Gloucestershire's Workforce Priorities

Through collaboration across all seven councils, we've identified opportunities to shape workforces that can deliver on Gloucestershire's bold vision and ambitions:

1. **Create a 'fresh start' for the new organisational cultures, marking the opportunity to reset organisational identity and behaviours following reform, creating more inclusive and energising environments.**
LGR offers a valuable opportunity to reset organisational cultures. It's a chance to reaffirm shared values, refresh our identities, and foster more dynamic, inclusive workplaces. By moving beyond legacy behaviours and empowering staff to shape the new cultures, we'll boost morale, strengthen engagement, and inspire pride in each council's future.
2. **Accelerate digital confidence and capability: Reflects the commitment to equip staff with digital skills and tools.**
We're embedding digital, data and technology (DDaT) at the core of the new councils, backed by real investment in upskilling our people so that they have the tools and support they need to thrive. By expanding graduate schemes and digital apprenticeships, we'll build workforces that are digitally confident, ready to innovate, and equipped to deliver modern, responsive public services.
3. **Design inclusive career pathways, reflecting the commitment to support both specialist and generalist progression by creating flexible, transparent career routes that value diverse skills and aspirations.**
We're committed to clear, flexible career pathways that let both specialists and generalists thrive, without being pushed into unsuitable management roles. Current structures often lack the flexibility to support dual career tracks, which can limit the development of specialist expertise. By valuing every route equally, supporting career exploration, and being transparent about role expectations, we unlock talent at every level. And for regulated professions, such as S151 officers, we'll keep the depth and accreditation that excellence requires.
4. **Championing diversity of thought and inclusive behaviours, highlighting the importance of embedding equity and inclusion in recruitment, leadership, and everyday practice.**
LGR is our platform to embed inclusive practices and celebrate diversity of thought at every level. We're tackling underrepresentation head-on, making sure all staff feel seen, heard, and valued. Our priorities include inclusive recruitment, diverse leadership pipelines, and open dialogue across teams. By championing different

perspectives and lived experiences, we'll strengthen decision-making, build community trust, and create workforces that truly reflect the population they serve.
5. Building leadership capability – referring to the qualities, skills, and support needed for leaders to guide teams effectively through change and deliver high-quality services.
Strong leadership is key to navigating change and delivering high-quality services. LGR creates valuable opportunities to grow leadership at every level. Through shared training, mentoring, and clear development pathways, the councils can support leadership growth while defining the qualities needed for the future. By investing in our leaders, we'll boost confidence, enhance engagement, and equip managers to lead with clarity, empathy, and purpose – amplifying the strengths already thriving across our teams.
6. Creating anchor institutions for the wellbeing of our communities
The 2021 Gloucestershire Director of Public Health's annual report "Sources of Strength"[55] described how 'anchor organisations' can support community health and wellbeing and help tackle inequalities in their places. Anchor organisations like the new unitary councils will take direct action in areas like employment policies, procurement, buildings, the environment, and place-shaping – leveraging our assets and influence for local benefit. As two of Gloucestershire's largest employers, we'll lead by example.
7. Supporting staff who may not continue in the new unitary councils
LGR is also about looking after our people. For those not transitioning into new roles within the new organisations, we'll offer tailored support – including CV writing, interview preparation, and access to redeployment resources – so that everyone feels respected, empowered, and ready for their next step. This compassionate approach values individual contributions and helps maintain positive organisational cultures throughout the change.

[55] www.gloucestershire.gov.uk/media/nb5dugc1/dph-report-2021-sources-of-strength.pdf

The New Councils: Digital, Data, and Technology

Designing Digitally-Enabled Organisations for Gloucestershire

Since the announcement of LGR, we've worked with the Local Government Association (LGA) and other councils who've already navigated this process to understand the realistic opportunities and learn from their experiences in Digital, Data and Technology (DDaT) transformation. This collaborative approach has enabled us to identify opportunities, challenges, and best practices, ensuring that our DDaT aspirations are informed by real-world experience and aligned with the government's digital blueprint[56].

Putting residents and communities first is at the core of our DDaT approach. We're designing digital services that work for everyone – whatever their age, ability, or access to technology. While we're investing in DDaT to improve outcomes and experiences, we recognise that not everyone can or wants to access services online. We'll continue to offer alternative ways to get support and information, ensuring that no one is left behind.

Our DDaT vision is to **transform the experience of local public services**, designing organisations that are truly fit for the digital age: innovative, efficient, and built to meet the expectations and needs of our local people, communities, and staff.

By bringing together county and district services across two unitaries, we can simplify and standardise services, so every resident enjoys a consistently good experience – no matter where they live or what service they use. This means **easier access, less confusion, and no need to repeat information or navigate multiple systems.** It allows us to focus resources where they are needed most, respond quickly, and deliver joined-up, reliable support. Ultimately, we're building councils that are more efficient, more responsive, and better able to meet the needs of our communities.

What Do We Mean by Digital, Data, and Technology?

Digital: we're creating an empowered and user-centred culture – investing in the right skills and tools to deliver seamless, end-to-end online services that people choose to use because they're simple and effective.

Data: we'll use data strategically and ethically to drive smarter decisions and deliver personalised support. At the heart of our data use will be secure and ethical data sharing, improving interoperability across systems, and using insights to redesign services around real need.

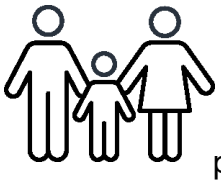
[56] www.gov.uk/government/publications/a-blueprint-for-modern-digital-government

Technology: our approach is robust, secure, and flexible – from cloud and low-code to open-source tools and responsible use of AI. We'll deliver resilient, scalable systems that support innovation and work together effortlessly, so every experience feels joined-up and intuitive.

What Difference Will Designing Digitally Enabled Organisations Make?



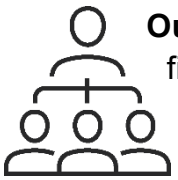
Our residents and businesses across Gloucestershire will access services that are consistent, proactive, accessible, and responsive – joined-up across the councils and their partners. By using data smartly (where it makes sense to rather than 'just because'), we'll deliver the right support at the right time, cutting out repetition and confusion. Whether its online, by phone, via email, or face-to-face, everyone gets the same reliable service. And because digital exclusion is real, we're committed to making sure that everyone – regardless of how they choose to engage – can access the support and services they need.



Our communities will have more opportunities than ever to shape services and share their views. Digital platforms will make it easier to access data, share views, respond to consultations, and work in partnership with us – building fairness, trust, and real empowerment. This means communities are enabled to respond to local issues themselves, as well as target support and resources where they are needed most, strengthening local resilience.



Our staff will have the right tools and connected systems, working in cultures that champions learning and collaboration. Routine tasks will be automated, freeing up time for complex work and collaboration within and outside the organisations. We'll trust our staff to experiment, adapt, and grow, supporting them every step of the way to build new skills.



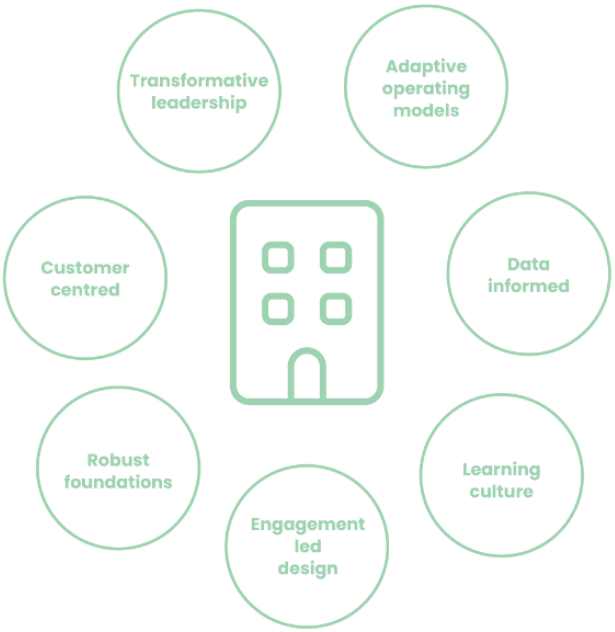
Our leadership will have real-time, high-quality insights at their fingertips, enabling confident, informed decisions. With LGR unlocking joined-up data, we'll see across systems, anticipate future needs, and target resources where they'll have the greatest impact.

Our new unitary authorities will be better equipped to manage demand, streamline processes, and evolve services in innovative ways. By harnessing digital and data capabilities, we'll break away from traditional models of local government service delivery, enabling more targeted support and adaptive operating models. We're committed to becoming employers of choice: attracting and retaining talented people by fostering modern, inclusive, purpose-driven workplaces where staff feel empowered to make a real difference.

Our partners will benefit from shared platforms, ethically aligned data, and collaborative delivery, making it easier to work across organisational boundaries. We'll reduce duplication, remove barriers, and create seamless experiences for people using services across different agencies.

Strategic Components of Our Approach

DDaT sits at the heart of Gloucestershire's transformation. We've identified seven key areas that will help us turn our ambition into action – each focused on delivering better outcomes for residents, communities, and businesses.



Transformative leadership

Our leadership will encourage bold innovation – **challenging the status quo** and championing joined-up services across teams, organisations, and sectors. Leaders will foster a culture where experimentation is encouraged, help remove barriers, and use data to make informed decisions. They'll empower staff to 'build, test, learn', embracing continuous improvement over perfection at the first

iteration. They'll ask the right questions, equip staff with the tools to answer them, and act confidently on what data reveals.

Adaptive operating model

We'll adopt reusable common components wherever possible, ensuring data portability and a consistent user experience across services.

All services will be online by default (with alternative channels available), underpinned by a single digital process regardless of contact channel. We'll remove unnecessary hand-offs, reduce duplication, and make it simpler and quicker for residents to get what they need. By joining forces with partners across the public and voluntary sectors, we'll deliver a simple and consistent experience across the whole system.

Data-informed decisions

Traditionally, local government has faced challenges with fragmented datasets – both within and between organisations – making early intervention difficult. LGR offers a real opportunity to break down these silos, joining up services and data to enable earlier intervention, faster responses, and more effective prevention. **Evidence-based decision making and investment in analytics, predictive modelling, and AI will better equip us to anticipate demand and drive continuous improvement.**

Robust data governance is non-negotiable. We'll use information safely, securely, and ethically – joining up across services and with partners when there is consent and clear purpose. Clear principles and accountability will guide how we use AI and data, building trust and delivering value responsibly.

The new unitary authorities will enable the implementation of a joined-up predictive analytics platform across adult and children's services, education, housing, and health. By pooling data that used to be locked in districts and county silos, the system will help identify early warning signs of safeguarding risks – such as school absence, housing instability, or repeat A&E visits – and trigger coordinated interventions when needed. In our MASH, for example, we'll enable real-time data sharing across agencies, standardised data formats and dashboards, predictive analysis to identify risk earlier, standardisation of risk thresholds, and automation of routine processes (e.g. triage and referrals).

Customer-centred services

Customer experience and our approach to digital must go hand-in-hand.

For each council, our aim is to deliver **intuitive, accessible, and consistently high-quality online services for all residents and customers - putting them at the heart of our service design.** One phone number. One website. An integrated digital front door – incorporating tools like live chat and chatbots for 24/7 availability. With smart digital tools and AI, we'll track progress on cases, keep people updated, and resolve issues faster, freeing up our staff to focus on supporting people with more complex needs.

We'll build public trust through transparency – open dashboards showing our performance, reliability, and commitment to high standards. By connecting information across services, we'll build a fuller picture of our communities' needs and respond with care.

User-centred design and continuous improvement will be our standard. We will test new services and features with real users, gather feedback, and keep improving, so that what we deliver is always intuitive, accessible, and genuinely useful. This will help us to identify and address issues early, refine our services, and make sure our services work for everyone.

Learning culture

We're creating cultures where **curiosity is celebrated, change is embraced, and learning never stops.** We'll blend the best of our existing strengths with our appetite for more experimentation, collaboration, and continuous learning.

We'll learn from the best – partnering with national initiatives like the LGA and the Government Digital Service to improve digital consistency across the sector and drawing inspiration from places that have already led the way, like Greater Manchester and Data Mill North. We'll bring together the councils, NHS, universities, technology start-ups, and other partners to pilot bold new ideas and turn innovation into action.

We'll invest in digital skills at every level, including digital apprenticeships, to **build workforces that can deliver and sustain transformation.**

Listening to our residents and stakeholders

To build online services that are truly inclusive and genuinely responsive to our residents' expectations and needs, we must actively listen to them and recognise the digital exclusion challenges across the county.

Our digital engagement approach will support Gloucestershire's residents and communities to easily provide feedback, join resident panels, and co-design services. Aligned to our proposed locality arrangements, we'll make appropriate data and insights available so that our communities are empowered to shape

solutions to local concerns and issues. By teaming up with partners like the VCSFE and parish councils, we'll boost digital skills and deliver meaningful digital engagement.

We'll use data and digital platforms to tailor engagement by location, interest, or demographics. **Robust feedback loops, co-design practices, and transparency will improve inclusive service delivery and build trust with our residents.**

And we're committed to true accessibility. If digital isn't an option, we'll meet people where they are – by phone, in person, or through trusted local partners.

Regardless of the contact channel, the process and experience must feel consistent, joined up, and fair, **ensuring that no one is left behind in our digital transformation.**

Robust infrastructure

The success of the new councils will fundamentally rely on robust and dependable technology foundations. We'll ensure our infrastructures, devices, applications, and data are up-to-date, secure, resilient, and dependable.

We'll move to the cloud-based platforms where it makes sense. But we won't just simply replace legacy systems in the cloud – **we'll seize every chance to transform services, using flexible, open-source solutions to promote transparency, efficiency, and innovation.**

Every investment in our infrastructure will be futureproof: cyber-secure, sustainable, and built to last. We'll set clear design principles to prioritise standardisation and interoperability. Environmental sustainability will be a key consideration, ensuring our technology decisions support the councils' broader climate and carbon reduction commitments.

We'll equip teams with the right digital tools - like low-code platforms - to design, test, and launch new solutions at speed, scale, and lower cost. We'll tackle 'shadow IT' – where tools, apps, or systems are procured without the approval of the central DDaT service – to ensure every technology decision is strategic, centralised, and fully aligned with our DDaT ambitions.

Our DDaT investments must go beyond devices and platforms to include connectivity. While most of Gloucestershire already enjoys superfast broadband, we'll close the gaps, especially in rural and digitally excluded areas. As unitary councils we'll be better placed to coordinate infrastructure investment, work with national programmes, and ensure that all communities, regardless of geography, can benefit from modern, reliable, and inclusive digital services.

Summary

Designing digitally enabled councils for Gloucestershire isn't just bold, it's essential. **We're laying the foundations for modern, responsive, and inclusive organisations.**

The risk of not embedding a clear digital strategy and robust DDaT foundations from day one is real. Without it, we risk building on fragmented systems, outdated processes, and inconsistent data – driving up costs, slowing progress, and limiting our ability to innovate, collaborate, and meet rising expectations.

Our case studies (Appendix 2) already show how **digital is improving outcomes** across the county, streamlining services, and supporting those who need us most. But the real opportunity lies ahead: working together to deliver consistent, high-quality outcomes for everyone who lives, works, or visits Gloucestershire.

As we move through the phases of LGR, our strategy will balance innovation with stability. We'll embed customer focus from the outset and set a clear roadmap for future transformation.

Ultimately, our DDaT ambitions will enable us to become proactive councils that deliver meaningful outcomes. Our new councils will feel modern, human, and trustworthy - **designed around the people we serve and powered by the best of digital, technology and data insight.**

The New Councils: Democratic Arrangements

We're creating two strong, focused councils, each with a clear vision for their area, championing local priorities while working together in Gloucestershire's wider interest.

Local members will be strong representatives and true community leaders, deeply connected to local priorities and aspirations, clearly accountable for services, and powerful convenors who bring people and partners together to deliver real impact.

Merging the county and district councils into two new unitary authorities will simplify local government, making it easier for residents to engage with the council, with local members at the heart of that relationship.

While some services will be shared, members on each council will ensure **services are tailored to local needs** and will hold services to account.

Right now, electoral arrangements across seven councils mean that every year sees a council election in at least one part of the county. **This new model brings coherence, clarity, and a stronger voice for every part of Gloucestershire.**

Council	Number of Councillors	Electoral cycle	Next election
Gloucestershire County Council	55	All out every 4 years	May 2029
Cheltenham Borough Council	40	Elected in halves every 2 years	May 2026 May 2028
Cotswold District Council	34	All out every 4 years	May 2027
Forest of Dean District Council	38	All out every 4 years	May 2027
Gloucester City Council	39	All out every 4 years	May 2028
Stroud District Council	51	All out every 4 years	May 2028
Tewkesbury Borough Council	38	All out every 4 years	May 2027
Total	295		

Table 9: Current electoral arrangements

Creating two unitary councils will streamline local democracy, reduce councillor numbers, and create a more stable political landscape for Gloucestershire. But this isn't just about efficiency, it's about strengthening local voices.

We're committed to **enhancing democracy**, not diluting it. Both new councils will be built around a culture that empowers local members to lead, listen, and act on what matters most to their communities.

To ensure **fair and effective representation** from day one, we'll use the existing county council divisions - recently reviewed and electorally balanced - avoiding the disruption of an immediate boundary review. This provides a solid, balanced foundation for local democracy, with electoral equality built in.

The result? **A simpler, stronger, and more accountable system, designed to serve every part of Gloucestershire better.**

To ensure strong local representation and capacity from day one, each ward / division will elect two councillors. Using the existing recently reviewed county council divisions avoids the need for an immediate boundary review. In contrast, current district ward boundaries aren't fit for purpose: unequal elector ratios and inconsistent structures (single-, double-, and triple-member wards) make them unworkable for a modern, unified council.

This approach delivers:

- A West council with 58 members and an East council with 52, a **total reduction of 185 councillors**.
- Elector ratios of 1:4,454 in the West and 1:4,503 in the East, slightly above the average for similar unitary councils, but well within a fair and functional range.

Our councillor-to-elector ratio ensures:

- **Capacity to lead through transition** while staying closely connected to communities.
- **Representation across large, rural divisions** with multiple parishes.
- **Clear democratic accountability from day one**, with councillors who are visible, accessible, and responsive representatives of their communities.

In time, a boundary review will help streamline representation further - reducing reliance on two-member divisions and making it even easier for residents to know who represents them.

Our governance will be built on four core principles:

- A clear voice for Gloucestershire
- Easier collaboration across the public sector
- Strong transparency and accountability
- Community needs at the heart of every decision.

We'll deliver strong, responsive governance through clear leadership, local empowerment, and deep community connection. We'll deliver this through:

- **Bold, visible leadership** from a Leader and Cabinet in each council, driving collaboration and playing a leading role in the future Combined Authority.
- **Engaged, flexible scrutiny** that brings together all political groups - and where needed, external voices - to shape policy and hold decisions to account. We will use creative, constructive approaches to scrutiny, working at both a strategic and a local level to make sure we're meeting the needs of our communities.

- **Proud civic leadership**, preserving the heritage of Gloucester and Cheltenham while elevating their roles at the heart of each new unitary council. The Chair of the council and strong ties with the Lord Lieutenancy will uphold county-wide identity and tradition.
- **Local decision-making power** through area planning committees, handling planning and other place-based matters where local knowledge matters most.
- **Neighbourhood Partnerships** that reflect real communities and local priorities, shaping services, guiding funding, and driving community-led development.
- **A stronger role for Town and Parish Councils**, backed by a jointly owned charter and new opportunities to take on devolved powers, tailored to each council's appetite and capacity.
- **Real opportunities for children and young people** to share their views and help shape the decisions that affect them.
- **A culture of participation**, with co-production and engagement embedded in how we work, reaching every community, including those in non-parished areas.

The New Councils: Empowering Gloucestershire – Our New Locality Arrangements

Unitarisation provides us with a unique opportunity to **rewire the connections between places, people, and organisations**. Since the English Devolution White Paper was issued, the seven councils in Gloucestershire have worked together to **reimagine our system, with local places at its heart.** The result is a proposal to unlock the strengths in our community organisations, in our diverse places, and above all, in the people of Gloucestershire.

Our council Leaders are united in a desire to shift the extent and quality of community empowerment. We want to take the best of our smaller scale, localised, good practices - delivered by councils and key partners – and scale it up, making it central to how we work as new councils.

Grounding our approach in evidence

Gloucestershire's seven councils have worked closely with key local associations and organisations to understand what truly empowers communities and to map the strengths of our current system. We've also drawn on insights from over 20 unitary councils with area-based arrangements and conducted a thorough review of national best practice. Our early conclusions were clear: given the scale and diversity of the East and West Gloucestershire councils, **a neighbourhood approach is essential** - for our future accountability, effectiveness, and cohesion.

Among many learning points, the following stand out:

- **Trust and consistency matter:** Too often, new unitary councils have struggled to deliver the locality promises set out in their proposals, risking trust – especially with parishes and the VCFSE sector. Our approach puts **long-term relationships and trust at the heart of everything we do.**
- **A priority for the whole of both new councils:** Neighbourhood arrangements are not an 'add-on'. To deliver prevention, participation, and wellbeing, good practice cannot be confined to a neighbourhood model. **Leadership, culture, and structure must be joined up and laser-focused on empowering communities.**
- **Community development drives real change:** Unitary councils have made strides on using area-based arrangements to act on visible economic and environmental issues, but many have found tackling health, inequalities, and social challenges at the neighbourhood level has been tougher. By **applying resources and focus to community development**, working hand-in-hand with the VCFSE and NHS, we will unlock better outcomes. In our model, the role of public health is central - bridging the priorities and capacities of health and local government systems.
- **Area-based approaches build stronger communities:** The evidence is clear: when councils work across sectors and issues, communities thrive. But a top-down, overly formal approach stifles innovation and inclusivity. We're committed to test-and-learn, and genuine engagement in ways that make sense to people - making sure every resident feels included.

These learning points have been crucial in shaping our model and proposals**.**

Our current locality models

Neighbourhood approaches are already woven into the fabric of local services, delivered by councils and partners at various geographic scales. As current district boundaries become less relevant, our focus shifts from serving broad populations of 100,000 plus, to local communities of 20,000 - 50,000. **It's about putting people at the centre - organising around natural communities and driving real change where it matters most.**

The Gloucestershire Place Pyramid

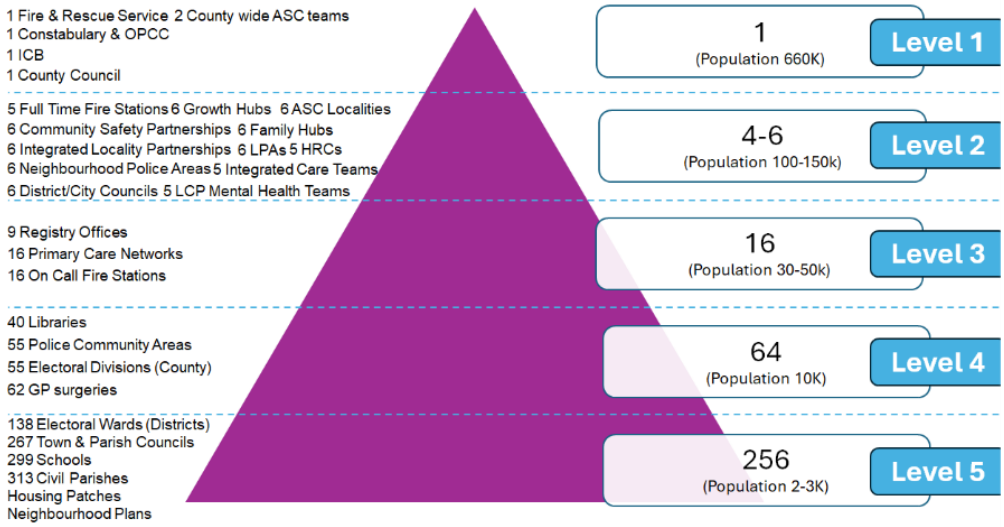


Diagram 1: Gloucestershire's current locality approaches

Across our seven councils and partners, we see a rich diversity of approaches – each driving positive change in its own way:

- **Stroud's community hub approach:** born during the pandemic, but now evolved into a dynamic partnership - bringing together local voluntary organisations, parishes, and housing providers to tackle social isolation and health and wellbeing
- **Integrated Locality Partnerships (ILPs):** led by the NHS, uniting health and other partners at a local level, currently based on district footprints
- The wealth of **community-centred regeneration and economic initiatives**, including the award-winning Gloucester Forum and the Golden Valley development in Cheltenham – proof that **local ambition delivers real results**
- **The Forest of Dean's innovative partnership** between the district council and Forest Voluntary Action Forum has developed a dynamic approach to youth services and more
- The recent successful launch of **Gloucestershire's** Family Hubs and associated Family Hub Networks. Organised in five locations across the county, with an emphasis on wider outreach. Partners include the Gloucestershire Gateway Trust which has developed a neighbourhood and community led approach to supporting children and families

- The area-based **community development approach pioneered in Tewkesbury** and closely tied to the rapid housing and business growth in the area
- Cotswold District Council's active approach in its unique geography supports 115 parish and town councils, with the annual **'Cotswold Parish and Town Summit'** as a showcase for local leadership and collaboration.

We know that great practice already exists in Gloucestershire – but much of it needs to be scaled up and shared across boundaries.

Neighbourhood Partnerships: A new way of engaging and delivering

We're proposing a new system of Neighbourhood Partnerships[57]. Each partnership will have the freedom to set its own agenda and priorities, **rooted in what matters to local people.** Their scope is broad by design – giving every place the space to shape its own future. The five key roles each partnership will perform are set out below:

Core roles for Neighbourhood Partnerships	
Engagement and empowerment	Each neighbourhood will build on existing great work to get local residents and organisations involved. **Neighbourhoods will be the go-to forum for the council and other agencies to listen, consult, and make sure actions are relevant and responsive to local needs.**
Community development	Neighbourhoods will be backed by real resources to drive community development. Working with public health, and other expert capacities, community development will play a key role in **tackling inequalities and amplifying the voices of those too often unheard**. Neighbourhoods will work closely with the VCFSE sector to shape and provide this function.
Service access and delivery	Each neighbourhood will map local services, data, assets, and capacity. **All council services will work together with neighbourhoods**, with many having a visible, accountable presence at the local level. How different services are involved will naturally vary.
Funding and decision-making	Neighbourhood Partnerships will have a main committee made up of local councillors and non-voting members from local organisations. Neighbourhoods will get **funding and staff resources to deliver** on its priorities. Committees will set their own work programmes, decide how resources are used, and make decisions on local priorities. They'll be accountable to local people, shape council work on the ground, and play a key role in the planning system.

[57] 'Neighbourhood Partnerships' would fulfil the role of 'Neighbourhood Area Committees' set out in the current Devolution Bill

Core roles for Neighbourhood Partnerships	
Prevention and Wellbeing	**Neighbourhood structures aren't a *'nice to have'* – they're essential**. Connected communities achieve better outcomes, from early years and health to democracy and community safety. We'll put data and evidence at the centre of Neighbourhood working, powered by our public health and performance capabilities. Neighbourhoods, whilst setting their own priorities, will have **a duty to focus on prevention in everything they do.**

Table 10: The core roles for Neighbourhood Partnerships

We've built these core roles by listening to the views and experience of councillors from all seven councils. At a recent all member webinar, councillors ranked the key roles for Neighbourhood Partnerships in order of importance – and the results are clear. Service accountability, residents voice, health and wellbeing, community development, and joined up working between the councils, parishes, and partners all came out on top. This prioritisation will continue to be tested with local people and organisations.



Diagram 2: Results from all member webinar ranking exercise

The size and shape of our Neighbourhoods

Neighbourhood size and boundaries won't be drawn in isolation – they'll be shaped by thorough consultation. Our research suggests each neighbourhood needs to be big enough for the councils and partners to focus resources, but small enough to reflect a natural community. Most will be made up of a main town and its surrounding villages, or a recognisable neighbourhood within a major town or city. We're suggesting populations of 20,000 - 50,000, with options set out within the consultation process. The result will be between seven and 12 Neighbourhood Partnerships for each of East and West Gloucestershire.

We're proposing the current county electoral divisions as the main 'building blocks' of neighbourhoods. But boundaries aren't set in stone - this will form part of the consultation and some adjustments will be needed to better reflect natural communities. Neighbourhood committees will be composed of between four and ten local councillors (depending on size), in addition to co-optees.

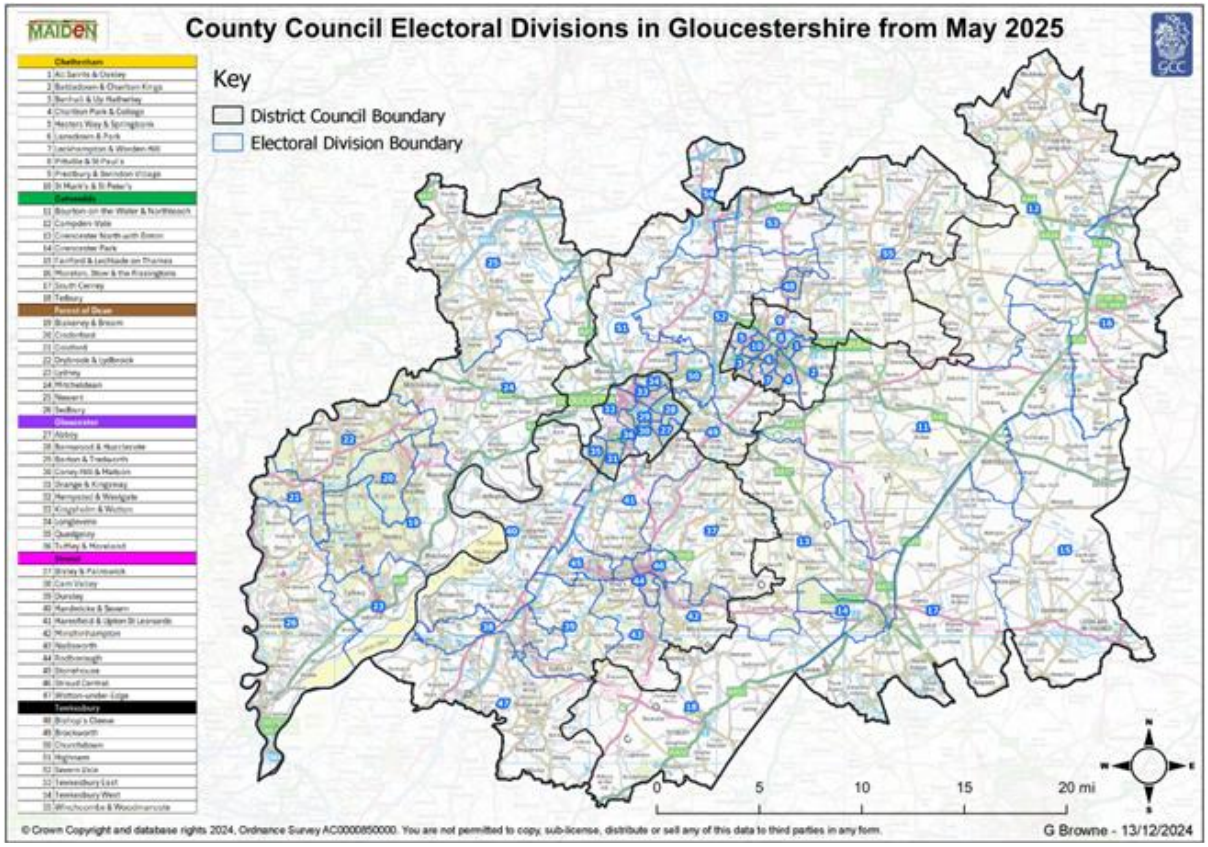


Diagram 3: the current county electoral divisions

Our adaptive and flexible approach

Not everything the councils do will fit neatly into our structure of Neighbourhood Partnerships. We would expect the shadow authorities to consider area-based Development Control committees on a larger scale than Neighbourhood Partnerships. But **Neighbourhood Partnerships will still play a vital planning role** - acting as consultees in a future *Statement of Community Involvement* and, where it makes sense and is wanted locally, in the development of *Neighbourhood Plans*.

Investing in Neighbourhoods

Expert teams will be built around our Neighbourhood Partnerships:

- **Chair of the Neighbourhood Partnership**: An elected councillor, nominated by councillors in the neighbourhood
- **Neighbourhood Partnership manager**: Together with the chair, this role will form a crucial leadership partnership in making the neighbourhood work successfully
- **Council neighbourhoods teams**: Officers assigned to each neighbourhood. A mix of practically focused managers, town and parish liaison officers, and community development specialists
- **Departmental council officers:** Located in family hubs, housing patches, planning, public health, or social care, these officers will have a strong relationship with neighbourhoods
- **VCFSE:** The VCFSE sector will play a crucial role in the grass roots work for each neighbourhood, some potentially working with the councils in managing and facilitating a whole neighbourhood, or providing expertise in community development
- **Partner organisations:** Health, fire and rescue, police, schools, and registered housing providers will also play a vital part. Over time, we expect to see stronger alignment of partner boundaries with that of our Neighbourhood Partnerships
- **Performance teams**: Data and evidence specialists will be assigned to neighbourhoods to help identify insights and needs, and track progress
- **Public Health:** Professional oversight and support, ensuring neighbourhoods use data, policy, and evidence to maximum effect
- **Director-level officer champions:** Each neighbourhood will be assigned a director-level officer champion to support leadership and delivery
- **Services**: Every external-facing council service will develop a neighbourhood offer, ensuring the approach runs through everything we do
- **Budgets:** We anticipate providing a budget for each neighbourhood to fund projects and activities. We also want neighbourhoods to have real influence on other funding streams, both from council departments such as highways and transport, and as part of central government bids.

Every neighbourhood will have its own context, needs, and ambitions. Whilst all will get a baseline support offer, the new councils, with partners, will focus on addressing inequalities, some of which will be more prominent for particular neighbourhoods.

Enabling the VCFSE to achieve more

To strengthen our commitment to residents and Gloucestershire's 4,600 VCFSE organisations, **we'll create a Civil Society Covenant with the Gloucestershire VCSE Alliance**. This Covenant, backed by a clear action plan, will set out how local government and the VCFSE will work together for stronger communities. The Covenant could remain a shared project for both new councils, with councillors from both councils joining VCFSE partners on a joint governance body established

over the Shadow Authority period. Alternatively, the new East and West authorities could choose to take this forward separately.

Making the role of local councillor more effective and accountable

Unitarisation means fewer councillors covering more service areas, bigger geographies, and more electors. **Neighbourhoods provide the crucial local member role with greater structure, capacity, and convening authority.** Neighbourhoods bring partners around the table, helping councillors address issues collectively and with expert support. This joined-up approach reduces duplication and supports meaningful two-way engagement between elected members, residents, and organisations.

Working with local councils (parishes and towns)

Gloucestershire's 267 parish and town councils are a vital part of our communities – and LGR will have a real impact on them. **Parish and town councils are an essential, vibrant part of our communities**, and we see their development as a vital ingredient in our unitary future. The lesson from elsewhere is that where trust and respect between principal councils and local councils break down, opportunities are missed and outcomes suffer.

We'll work with the Gloucestershire Association of Parish and Town Councils (GAPTC) and the Gloucestershire Society of Local Council Clerks (SLCC) to **develop a new charter**. A draft will go to the shadow authorities for adoption, setting out clear rights, responsibilities, and governance arrangements to maximise collaboration and two-way communications. **This charter will be the foundation for strong, effective partnership between principal authorities and local councils.**

Neighbourhood Partnership will be a linchpin for locality working - and town and parish councils have a valuable role to play in these structures. The charter process will be developed for all of Gloucestershire, with the respective East and West shadow authorities deciding whether to maintain a joint arrangement or take forward separately.

As the county's major urban areas, we expect **special consideration by the new council will be given to parishing Gloucester and Cheltenham**. Each has major historical and future importance for Gloucestershire, and parishing will help protect their identity and drive momentum. Subject to consultation, we expect community engagement and neighbourhood empowerment to be strengthened by the good governance through parishes that cover most of each urban area. In Gloucester, this could mean a single large parish (city) arrangement, potentially excluding the existing parish of Quedgeley. In Cheltenham, options include a single town council or a federated parish model, combining existing parished and unparished areas. These new arrangements would hold some of the key cultural, civic, and public realm responsibilities, and play a major part in boosting the visitor economy.

Beyond Gloucester and Cheltenham, many parishes are eager to develop their offer. We'll work positively with these parishes to maximise value for local people

and places, keeping value for money in mind**. There will be equal opportunities for larger areas (like Cheltenham and Gloucester) and smaller towns or parishes to take on services and assets.** The new councils will keep a close eye on overall council tax levels, including parish precepts. Any new parishing, or extension of parish responsibilities, will be a matter for the new principal councils to consider and subject to Community Governance Reviews.

We support recent Ministerial statements that have made clear the differences between parish and neighbourhood roles. Strong parish arrangements are vital, but they don't replace the need for a neighbourhood offer anywhere in Gloucestershire. We have valuable local capacity in our towns and parishes, and so we see their involvement in neighbourhoods as important. We celebrate the diversity in the parish offers across Gloucestershire as a reflection of what local people want and need in their communities.

Implementation

Seven activities will shape our work over the pre-shadow period, and are built into our implementation roadmap:

1. **Formal consultation on Neighbourhood Partnerships:**

Each council will deliver a **formal consultation on Neighbourhood Partnerships** in the shadow authority period, enabling implementation in Year 1 of the new unitary councils. We'll test our thinking through early engagement in the pre-shadow period. Our engagement and consultation will include:

- Neighbourhood Partnership geographies and boundaries
- Core roles and responsibilities
- Local priorities, services, and needs
- Alignment with partner organisations on approaches and geographies
- How Neighbourhood Partnerships may evolve over time
- The support, capacity, and resources needed to make them work (bearing in mind financial constraints).

2. **Civil Society Covenant:**

During the pre-shadow period, we'll co-design a Civil Society Covenant with the VCSE Alliance and partners, with a draft covenant ready for the shadow authorities to consider and consult on in readiness for Year 1 of the new councils.

3. **Local Councils Charter**

Working with GAPTC and SLCC, we'll develop a draft charter and action plan for the shadow authorities to consult on. The East and West shadow authorities will have the option of progressing the charter with a joint body of councillors and local council representatives, or separately. The seven principal councils will also work together in the pre-shadow period to ensure clear, consistent communications and policies are in place for working with local councils.

4. **Parishing Cheltenham and Gloucester:**

In partnership with Cheltenham Borough Council, Gloucester City Council, and the parish associations, we'll develop a model for how parishing can support the continued **identity, good governance, and regeneration / growth in our major**

urban areas. Decisions on the precise form of proposals and consultation process will rest with the new councils.

5. **Service planning:**

We'll consult with all county and district services in the pre-shadow period to shape how they'll work with neighbourhoods - feeding into service planning for the new councils and establishing a clear **'services and assets offer'** for each area.

6. **Policy development:**

A range of **policy development work** will ensure:

- Neighbourhood approaches are supported by good evidence
- Frameworks and models are established for different types of activity (such as community development, project funding, and neighbourhood action plans)
- Robust neighbourhood governance
- Neighbourhood level data and data insight tools are developed

7. **Partner integration:**

We'll work together with all our statutory partners to integrate our proposals with their frameworks and priorities. **Our neighbourhood structure will provide a powerful channel for partners to engage with communities**. We share the excitement and interest in how the NHS 10 Year Plan will translate into action in Gloucestershire, particularly regarding proposals for a 'Neighbourhood Health Service' and its emphasis on prevention. We will continue to work closely with our health partners and others to ensure the local geographies and approaches we use are aligned in the best interests of East and West Gloucestershire's residents.

The Financial Case for Two Unitary Councils (East/West) for Gloucestershire

The financial cases for both the 1UA and the 2UA options have been developed together, using the same financial model, assumptions, calculations, and governance.

Leaders, Chief Executives, and Section 151 officers from across all Gloucestershire councils have worked together to develop, scrutinise, and sign off all key inputs, assumptions, and outputs. This joint approach means both financial cases are robust, transparent, and carry a high level of local assurance.

The financial case for the **2UA proposal** is set out in four stages:

1. **Overall financial case summary**
2. **Day one financial position[58]:** This is the starting baseline in terms of potential income and expenditure that the new councils would inherit
3. **Reorganisation costs and benefits:** The financial impact of the structural changes that are likely as a result of LGR, including:
    a. One-off transition costs e.g. for data and systems migration or implementation management
    b. The ongoing recurring costs resulting from the disaggregation of county council services
    c. Recurring reorganisation savings e.g. in relation to service consolidation
4. **Transformation benefits:** Savings as a result of fundamental changes to ways of working e.g. digitisation, automation, changes to ways of working, investment in prevention, or procurement.

Overall financial case summary

The table below sets out the key headlines for the 2UA proposal.

Potential day one financial position (c. 1st April 2028)	**East UA**	**West UA**
Total income	£410.5m	£440.9m
Total expenditure	£388.6m	£462.8m
Net position	**£21.9m (surplus)**	**-£21.9m (deficit)**

[58] The analysis takes account of the likely impact of the outcome of the Government's *Fair Funding Review 2.0 consultation*. Local assumptions, supported by the latest *Pixel* model available (*Pixel LGR Disaggregation Model August 2025 v1.2*), have been made in relation to Fair Funding. The projected financial positions will therefore need to be updated once national funding allocations are confirmed in the forthcoming Local Government Finance Settlement.

Total revenue implication of Fire & Rescue (i.e. additional pressures for the new UA)	-£1.35m	-£1.45m
Net position (incl. impact of Standalone Fire & Rescue Authority)	**£20.5m (surplus)**	**-£23.3m (deficit)**
Reorganisation Costs and Benefits	**East UA**	**West UA**
Gross annual reorganisation savings	£8.6m	£10.3m
Ongoing annual disaggregation costs	£3.7m	£4.4m
Net annual savings	£4.9m	£5.9m
One-off transition costs	-£13.2m	-£15.8m
One-off Fire and Rescue disaggregation costs	-£0.5m	-£0.6m
Total one-off transition costs	-£13.7m	-£16.4m
Payback period	4.9 years	4.9 Years
Cumulative net saving after 5 years	£0.5m	£0.5m
Cumulative net saving after 10 years	£26.3m	£28.5m
Transformation benefits	**East UA**	**West UA**
Recurring annual transformation savings fully delivered by year 5 – **Base**	£7.4m	£8.8m
Recurring annual transformation savings fully delivered by year 5 – **Stretch**	£12.0m	£14.4m

Table 11: Headlines from 2UA financial case

Note: Values preceded by a '–' symbol indicate a deficit.

Potential day one financial position (the starting baseline)

On day one, the financial starting points for the proposed East and West authorities would be materially different with the East projecting a £21.9m surplus and the West a £21.9m deficit - a gap driven by higher demand and spend in ASC and CSC in the West.

This position has been prepared on the basis that the seven councils will take any action required to achieve a balanced budget over the period leading to the anticipated Vesting Day of 1 April 2028. The difference in the estimated day one

financial position between the East UA and West UA is a function of differences in income and expenditure, in turn driven principally by variances in social care demand and cost between East and West.

In addition to this, based on discussions with MHCLG and in line with the provisions in the Fire and Rescue Services Act 2004, under a 2UA model, the fire and rescue service (which is currently integrated with the county council) will need to move to non-local authority governance, financial, and service arrangement (i.e. the creation of an independent Fire & Rescue Authority). As a result of this, there are likely to be additional revenue implications for both the East and West authorities which will impact the overall day one position as well (as set out in the table below).

Potential day one financial position (c. 1st April 2028)	**East UA**	**West UA**
Total income	£410.5m	£440.9m
Total expenditure	£388.6m	£462.8m
Net position	**£21.9m**	**-£21.9m**
Revenue implications of Fire & Rescue		
Gross corporate overheads	*-£0.53m*	*-£0.57m*
Estimated efficiency savings on corporate overheads to be delivered by vesting day	*£0.14m*	*£0.16m*
Net corporate overheads (e.g. for support services such as fleet, finance etc).	**-£0.39m**	**-£0.41m**
Contribution to capital	-£0.96m	-£1.04m
Total revenue implication of Fire & Rescue (i.e. additional pressures for the new UA)	**-£1.35m**	**-£1.45m**
Net position (incl. impact of Standalone Fire & Rescue Authority) (*Net corporate overheads + contribution to capital)*	**£20.5m**	**-£23.3m**

Table 12: 2UA day one financial position

Total income: These figures have been calculated by allocating county-level income (such as grants and retained business rates) alongside district-level council tax base forecasts, ensuring that each geography has an income share reflective of its local tax base. The Fair Funding Review is expected to reduce the overall level of resources for Gloucestershire and therefore, total income projections from 2025 MTFSs have been adjusted downwards at the time of writing. However, these numbers are likely to change further following the 2026/27 Local Government Finance Settlement in December 2025.

Total expenditure: This figure consolidates the full range of service responsibilities currently delivered across both county and district councils, including apportioning out the county level expenditure between the proposed East and West geographies (using Newton Europe analysis to apportion ASC and CSC spend, the KM Length split between East and West to apportion total highways spend, and population data to apportion all other county council service area spend).

Note: The source data for income and expenditure is based on each council's individual MTFS and each council has applied their own local assumptions on how to achieve balanced budgets over the four-year period to 2028/2029 e.g. in relation to how reserves are deployed.

In addition to the total income and expenditure position, it is also important to consider what the new councils will likely inherit on their respective balance sheets in terms of assets and long-term liabilities:

Assets and Long-term Liabilities	East UA	West UA
Total assets	£2.1 billion	£2.3 billion
Long-term Liabilities (excl. DSG)	£451.7 million	£458.7 million
DSG Deficit	£112.2 million	£122.1 million
Total liabilities	**£563.9 million**	**£580.8 million**

Table 13: 2UA total assets and long-term liabilities

- **Assets:** Total assets have been apportioned out on the basis of location. These figures reflect the combined current long-term assets with planned capital expenditure through to 2028/29. The portfolio comprises assets such as property, investments, and heritage assets, in addition to Housing Revenue Account assets.
- **Long-term Liabilities:** Long-term liabilities have been allocated out between the East and West based on the proportion of assets in each district as a proxy, and this includes outstanding borrowing. In addition to this, the Dedicated Schools Grant (DSG) deficit of £234.3 million has also been allocated out using the share of Education, Health and Care Plans based on location of schools as a proxy.

The DSG deficit is a material factor in the financial outlook for Gloucestershire. The most recent MTFS projects that the DSG deficit will rise from £76 million at the end of March 2025 to more than £100 million by March 2026. By 2028/29, the cumulative deficit is forecast to exceed £200 million.

At present, the statutory override allows councils to hold DSG deficits “off balance sheet”. However, this override is due to end in March 2028. If no new national policy is introduced, councils across the country would be required to absorb these deficits within their core budgets, creating a significant risk to financial stability.

For Gloucestershire, this means the DSG position must be kept under close review, with the statutory override and national reforms determining the future treatment of the deficit and ongoing cost of service provision.

Reorganisation costs and benefits

Moving to a unitary model creates costs and benefits which arise directly from consolidating seven councils into two new authorities. The financial analysis brings these costs and benefits together to show the savings that can be achieved, the costs of implementation, and the overall net impact.

Estimated savings, disaggregation costs and transition costs of LGR in Gloucestershire

UA	Annual gross saving	Additional Annual Costs	Net annual saving	One off transition costs	Payback Period	Cumulative net saving after 5 years	Cumulative net saving after 10 years
East	£8.6m	£3.7m	£4.9m	-£13.7m	4.9 years	£0.5m	£26.3m
West	£10.3m	£4.4m	£5.9m	-£16.4m	4.9 years	£0.5m	£28.5m

Table 14: Summary of 2UA reorganisation costs and benefits

The 2UA proposal is projected to deliver annual gross savings of £8.6m in the East and £10.3m in the West, with a payback period of 4.9 years (which is required to ‘pay back’ one-off transition costs of £30.1m).

Savings drivers

Key drivers for savings are as follows:

- **Democratic streamlining –** Through reducing the number of councillors (from 295 to 110 - split as 52 in the East and 58 in the West) and frequency of elections, savings of c.£0.7m per annum can be achieved e.g. from reduced member allowances and election costs.

- **Workforce rationalisation -** Consolidating senior leadership teams and streamlining back office functions such as finance, HR, ICT, and customer contact result in workforce savings (as these are likely to be positions and teams which are duplicated across all seven councils).The financial savings in a 2UA scenario reflect the need to retain two sets of senior leadership and core back office functions for each sovereign organisation.

- **Third party procurement and contract consolidation –** Opportunities to aggregate procurement, renegotiate contract terms, and standardise specifications will reduce cost and complexity. In financial terms, two authorities could be expected to deliver annual third party savings equivalent to approximately 1.2% of their addressable third party spend. Splitting some of the larger contractual arrangements currently in place (particularly across some of the county services including transport, adults and children's services) is likely to be complex and time consuming – estimates from service professionals suggest perhaps up to five years for some of the largest long-term contracts.

- **Property rationalisation -** Currently both county and district councils operate buildings that serve overlapping functions in the same localities. Creating two authorities allows for rationalisation of this estate, with duplicated sites removed and more efficient use made of shared service centres. In financial terms, two authorities could be expected to deliver annual property savings equivalent to approximately 10%.

One-off Transition Costs

Establishing two new authorities requires significant upfront investment covering the full programme of standing up new governance and operational structures; ICT integration and migration; development of two new legal and constitutional frameworks; public consultation; branding for two new organisations; communications; and programme management. This is estimated to cost c.£30.1m.

Type of transition cost	Estimated cost (£)
Redundancy	3,646,000.00
External comms, rebranding and implementation	549,000.00
External transition, design and implementation support costs	7,000,000.00
Internal programme management	3,300,000.00
Creating the new council	1,500,000.00

Contingency	8,100,000.00
Organisation closedown	400,000.00
Public consultation	412,000.00
ICT costs	3,500,000.00
Shadow Chief Exec / member costs	622,200.00
Fire and Rescue disaggregation	1,100,000
Total	**30,129,200**

Table 15: Estimated transition costs for 2UA

Additional Annual Costs – Disaggregation of County Services

A 2UA model also introduces ongoing duplication in services and governance that are currently delivered at county level.

Each new authority would require its own statutory leadership team, including Directors of Adult Social Care, Children's Services, and Public Health, as well as its own Monitoring Officer and S151 Officer. Safeguarding structures and SEND services would need to be duplicated, with two MASH arrangements, two education services, and two commissioning functions established. This duplication creates recurring additional costs that are not present in the 1UA model (where county services would not need to be split). These are estimated to be at c.£8.1m per annum.

Disaggregation cost category	**Estimated cost (£)**
Duplicated senior leadership	3,442,000
Duplicated county service delivery teams	4,317,000
Duplicated democratic structure	355,000
Total	**8,114,000**

Table 16: Estimated disaggregation costs for 2UA

Transformation benefits

Reorganisation can deliver structural savings, but a greater opportunity lies in the subsequent transformation that can take place. This means using the scale of new authorities to modernise services, redesign ways of working, and create efficiencies beyond what structural change alone can achieve.

Financial analysis has identified five main categories where transformation savings are realistic and quantifiable. For each category, we have tested two scenarios for transformation:

- **Base case:** Assumes cautious delivery of savings in line with past performance across Gloucestershire's councils. The base case is deliberately conservative and ensures that assumptions remain credible and deliverable without requiring major change programmes.
- **Stretch case:** assumes sustained investment in digital and organisational redesign, drawing on best practice from other unitaries. Including a stretch case is important as it demonstrates the potential prize available if early reorganisation savings are reinvested into transformation.

Category	Base %	Stretch %	Rationale
Front office staff	6%	12%	Workforce rationalisation through the structural impact of LGR accounts for savings that can be made through removing duplication. However, potential opportunities through utilising the potential of AI, automation, and channel shift will reduce the demand on customer contact centres.
Service delivery staff	3%	6%	Transformation can strengthen demand management, early intervention, and integrated pathways particularly in services like adults and children's services. Service redesign and new operating models will also unlock additional opportunities e.g. through digital, process redesign etc.
Back office staff	7%	9%	Consolidating support functions such as HR, finance, payroll, and ICT enables investment in shared systems and automation. This creates opportunities for streamlined processes and reduces overheads.
Third party spend	2.5%	3.75%	Unified procurement and contract management can deliver efficiencies by aggregating contracts, renegotiating supplier terms, and redesigning commissioning arrangements. However, savings targets are cautious overall recognising Gloucestershire councils already include procurement savings in their MTFSs, leaving limited headroom.

Income (sales, fees and charges / commercial)	1.3%	2.1%	Transformation also includes growth in fees and charges, commercial activity, and investment in economic development. This builds on the county's strengths in advanced manufacturing, cyber, and green technology, and on planned growth initiatives such as the Golden Valley and Severn Edge projects. Overall targets are conservative given volatility and underperformance in past income forecasts.

Table 17: Estimated transformation savings for 2UA

Transformation savings are not expected to be immediate. They are profiled to phase in gradually as programmes are implemented. The model assumes full delivery by **Year 5,** with the savings per annum expected by this point set out in the table below.

Transformation savings	**Base case**	**Stretch case**
Savings per annum by Year 5 – East UA	£7.4m	£11.9m
Savings per annum by Year 5 – West UA	£8.8m	£14.3m

Table 18: Total transformation savings in £ terms for 2UA

Options for funding LGR and enabling transformation

Delivering the 2UA option requires significant upfront investment with estimated transition costs of reorganisation of £29.0m (split out as £13.2m for the East UA and £15.8m for the West UA).

There are several options for funding these costs:

- **Reserves -** Councils hold reserves that are not earmarked that can be applied to one-off expenditure. These provide an immediate source of funding without adding to ongoing revenue pressures.
- **Capitalisation Direction -** Subject to government approval, some costs could be treated as capital rather than revenue. This option, known as capitalisation, has been used in previous reorganisations to reduce pressure on the revenue budget. It applies to costs such as redundancy and ICT integration.
- **Government Support -** Additional funding may also be provided by central government. This could be in the form of transitional grant support, flexibility in financial rules, or early devolution funding. Engagement with the government will be required as proposals are developed.

- **Reinvestment Principle -** Early reorganisation savings can be ring-fenced and reinvested in transformation. This ensures that efficiencies are not absorbed by service pressures but are used to fund programmes in digital, automation, and service redesign. By doing this, initial savings are recycled to create larger recurring benefits in later years.
- **Benefits Compounding -** Investment in transformation compounds over time. For example, reinvesting a portion of early savings into digital customer platforms reduces front office demand, delivering recurring efficiencies by year five. Similar reinvestment in automation and AI can reduce back office and service delivery costs.

Council Tax Alignment (CTA)

Council tax is a major source of income for any new authority. When seven councils with different council tax rates are merged into two new authorities, these rates must be aligned. The way this is done affects both residents and the financial resilience of the new councils. It is also a fiscal lever that can be used to balance out net operating deficits or provide funding to invest in service improvements or resident priorities.

Approach to Council Tax Alignment

To inform decision making, detailed modelling has been undertaken to show how different alignment options would affect what residents are required to pay in the future. The modelling uses the 2024 council tax base as the starting point, net of local council tax support, and applies the councils' own projections to forecast growth in the tax base inclusive of the collection rate. Future Band D rates are assumed to increase annually by 4.99% for county and unitary councils and 2.99% for district councils up to Vesting Day in April 2028, consistent with current MHCLG guidance. From Vesting Day onwards, a new unitary authority rate is assumed to increase at 4.99% per year.

The methodology compares projected receipts under alignment with a baseline of what each council would have collected if they continued independently. The difference between these two scenarios represents the additional income gained or foregone through alignment.

Note: There will be implications for council tax as a result of the fire and rescue service moving out of local authority finance, service, and governance arrangements in the 2UA scenario (i.e. raising of a separate fire precept). At this stage, the impact cannot be modelled precisely and has not been taken into account in the alignment options and impacts set out below.

Alignment Options

The analysis models a main scenario using the weighted average where rates align to an average Band D calculated across the county, weighted by the tax base. This is the option chosen in most recent local government reorganisations.

Each option can be implemented in one year or phased over several years, with the statutory maximum alignment period set at seven years. The period over which council tax is aligned is an important decision. A longer alignment period of up to seven years minimises the immediate impacts on residents by phasing changes gradually. However, aligning earlier allows the new authorities to secure additional income more quickly, providing funding for services. Earlier alignment also avoids the perception of unfairness where residents in some areas continue to pay higher rates for longer while receiving the same services.

Summary of potential impact

Council Tax alignment alters Band D charges across districts because current rates differ. The scale of change depends on which alignment option is chosen and whether this is implemented in one year or phased over several years.

Under the weighted average option for 2UA, impacts differ between East and West. In the East, Band D bills would fall in Cheltenham (£63.41) and rise in Cotswold (£30.80) and Tewkesbury (£35.77).

Current District	**Aligned Band D rate (£)**	**Change in Band D rate (£)**	**% change in Band D Rate**
Cheltenham	2,143.98	-63.41	-2.87%
Cotswold	2,143.98	30.80	1.46%
Tewkesbury	2,143.98	35.77	1.70%

Table 19: Weighted average council tax alignment in one year in the East UA

In the West, Band D bills would rise slightly in the Forest of Dean (£23.54) and fall in Gloucester (£3.50) and Stroud (£12.85).

Current District	**Aligned Band D rate (£)**	**Change in Band D rate (£)**	**% change in Band D Rate**
Gloucester	2,198.93	-3.50	-0.16%
Forest of Dean	2,198.93	23.54	1.08%

Stroud	2,198.93	-12.85	-0.58%

Table 20: Weighted average council tax alignment in one year in the West UA

Engagement to Discover and Improve

Our engagement approach has been shaped by the guidance within the invitation to submit proposals: it's been rooted in genuine discovery and learning, not campaigning for any particular outcome. This focus on open engagement has been enabled by:

- **Unified, option-neutral engagement:** We agreed that both the single unitary and East / West two unitary options would be developed side-by-side, without using the collective engagement activity to campaign or advocate for preferences
- **Strong political leadership:** Gloucestershire's Leaders set the tone – driving a shared engagement plan across councils
- **Clear accountability:** A lead Chief Executive was appointed to oversee all communications and engagement activity
- **Joint working:** Every council played an active role through a joint communications and engagement workstream
- **Prioritised investment:** We prioritised MHCLG LGR funding to support joint engagement activities.

These early actions, underpinned by a clear sense of purpose, enabled us to deliver a wide range of non-partisan engagement activities – each designed to listen, learn, and feed real insights back into the development of our proposals.

Our key engagement activity

Our joint engagement activity from March 2025 – September 2025 is summarised in the table below:

Engagement type	Key activities
Public	• Option-neutral Future Gloucestershire microsite[59] presenting clear, factual information • Online survey, designed to discover values, concerns and ambitions of local people (3,112 completed surveys, including 1,480 open-text responses) • In-person community events, enabling over 500 one-to-one conversations (12 events in total, two in each district) • Two county-wide public webinars • Information leaflets and display banners (used principally at council offices and community events)

[59] https://futuregloucestershire.org.uk

Engagement type	Key activities
	• Regular social media information updates and paid advertising for wider promotion of the survey.
Stakeholders	• Over 40 stakeholder interviews (almost all with multiple attendees) encompassing statutory partners, VCFSE organisations, and key businesses and business associations. Interviews focused on issues of importance and concern in relation to LGR and Devolution • A leadership conference was held to develop common ambitions, involving key partners in statutory services, business, and civil society in Gloucestershire.
Place	• Engagement webinar for VCFSE (hosted by Gloucestershire VCS Alliance) with over 100 attendees • Engagement webinar for Town and Parish Councils hosted by GAPTC with over 100 attendees • Representation on Place Model workstream from NHS (ICB and providers), GAPTC, OPCC, SLCC, and VCS Alliance.
Staff	• Regular LGR staff communications and briefings • Senior officers from principal councils represented on all LGR workstreams, with different Chief Executives acting to lead and chair • Specialist service officers engaged in structured, cross-council aggregation and disaggregation workshops.
Council members	• Interactive all-member webinars • FAQs and other written briefings • Bespoke briefing and democratic processes delivered by individual councils.

Engagement type	Key activities
MPs[60]	• Gloucestershire County Council Leader and Chief Executive monthly engagement with Gloucestershire MPs • Other district ad hoc engagement with local MPs
Other	• In addition to Place (above), workstreams conducted bespoke engagement as relevant. For example, the Vision and Ambition workstream conducted a range of briefings with senior district leaders to develop an understanding of place-based perspectives.

Additional reports

The online survey and in-person community events were co-designed and facilitated by an external specialist engagement organisation, *Cratus*. Their independent report can be found in Appendix 3.

The county council-led stakeholder interview exercise was conducted using consistent open questions. A short report detailing the key themes, together with information about the stakeholders engaged, can be found in Appendix 4. Following these interviews, some stakeholders chose to write to the county council offering views. Where appropriate, this correspondence is also appended.

Our learning and insights

Our learning themes synthesise the responses from a variety of methods and types used. As far as possible, we have avoided significant focus in this proposal on feedback on the relative merits of structural options, since the primary aim of engagement was to discover common concerns and ambitions of local people and organisations. However, some of this data, from the public survey and stakeholder interviews is shown for transparency. It should not be read as representative data on the preferences of the public and partners.

Three big themes have emerged:

1. Belonging in Gloucestershire
2. Service improvement

[60] At a meeting of all Principal Authority Leaders on 09/10/2025 it was agreed that Gloucestershire Councils would collectively engage with all local MPs to understand their preferences and comments in the light of the published proposals. This process will be conducted to develop an objective understanding of MP views to inform both Gloucestershire Councils and Ministers.

3. Vulnerable people and communities

Theme 1: Belonging in Gloucestershire

Our engagement revealed something powerful: people in Gloucestershire feel a strong sense of belonging - whether that's to a village, an estate, a district, or the county as a whole. Local identity runs deep, and it's clear that "home" means different things to different people.

This insight is crucial. It shows that the new council must enable participation and engagement at every level - recognising and supporting the many overlapping communities that make Gloucestershire unique.

Key actions to shape our proposals: Belonging in Gloucestershire (Theme 1)	
Place Model	Proposals for our locality arrangements have avoided prematurely drawing 'lines on maps'. We will deliver a carefully designed engagement and consultation process to develop the spatial scale, competency, and differentiation (by Place) of our Neighbourhood Partnerships. This commitment is reflected in our implementation roadmap.
Future Operating Model (FOM)	The differentiation of Gloucestershire's places is recognised in both the design principles and key features of the Future Operating Model. We have reflected place and identity strongly in engagement, commissioning, and service delivery features.

Theme 2: Service Improvement and Efficiency

Our survey captured a wealth of feedback on council services. Most areas scored well, with the majority of residents rating services as 'good' or 'very good'. However, roads, pavements, and streetlights stood out as clear concerns - mirroring national trends, where dissatisfaction with highways is common.

When asked what should shape future council services, 'community' - meaning representation, voice, and engagement - was the top priority. 'Transport' (including public transport, road maintenance, and connectivity) also featured strongly.

Stakeholder interviews reinforced this theme, highlighting the need for simpler, more efficient services and better integration with partners.

The message is clear: while there are specific areas to address, any improvement must be rooted in local context and connectivity - making sure services work for people and places across Gloucestershire.

Key actions to shape our proposals: Service Improvement and Efficiency (Theme 2)	
Vision and Ambition	Our vision and ambition includes a specific focus on the use of data to transform transport and wider public services. The feedback we have received on public transport in particular has assisted with shaping this ambition. Our vision and ambition also reflects the excitement and energy in the Gloucestershire business community to drive growth. We pay particular attention to the economic opportunities in Gloucestershire, and the desire to use LGR to accelerate our trajectory of breakthrough innovation in economic clusters, such as cyber, clean energy, and agri-tech.
Future Operating Model (FOM)	Our strategic enablement feature within the FOM is specifically designed to create capacity and capability to drive improvement and transformation.
Place and FOM	Our neighbourhood model is linked to service delivery within the FOM, with a proposed specification to tailor on a locality basis, addressing some of the feedback about different satisfaction and experience in different parts of Gloucestershire.
Financial Case	Our financial case shows our desire not simply to reorganise, but to transform. We will reinvest structural and transformation savings into services that people want to see improve. The councils will feel local and responsive but be powered by scale and efficiency for the benefit of everyone.

Theme 3: Vulnerable people and communities

A key theme from our engagement with partners was the opportunity for the new council to do more for Gloucestershire's most vulnerable people and communities.

- **Community development and local engagement must be front and centre.**
- **There's real appetite for public sector reform.** From the emerging Neighbourhood Health Service to new powers for neighbourhood working, they see LGR as a chance to join up regeneration, health, and community development - especially where VCFSE organisations are already leading the way.

- **Tackling deep-rooted inequalities is essential.** We know there are sharp divides between urban and rural areas, and that data and lived experience is important to drive local action and smarter service design.

Respondents have made it clear that LGR offers a huge opportunity to address these challenges and opportunities.

Key actions to shape our proposals: Vulnerable people and communities (Theme 3)	
Vision and Ambition	Our vision makes it clear that we want to use LGR to spark a transformation in community empowerment. We can be closer to communities and people than before, e.g. utilising better and more widely the 'hub' approach to delivering preventive, community-led activity, as well as more tailored services for vulnerable people, families, and communities. We are also clear in our vision that we will more consciously link with partners on wellbeing, housing, climate action, and nature recovery – feedback is showing these are connected issues for local people.
Data, Digital and Technology (DDaT)	Our proposals are clear there are major opportunities to use DDaT to drive better environments, interventions, and services for vulnerable people. We have set out a bold ambition to develop a joined-up predictive analytics platform across adult and children's services, education, housing, and health.
Place	Our place research has revealed a wealth of current good practice in evidenced-based community development. We have hard-wired into our neighbourhood proposals a focus on community development, supported by data insight, the skills of our public health team, and dedicated staff and other resources.

Feedback on structural options

Both the survey and the partnership interviews provided feedback on structural options. This feedback is not based on a statistically reliable sample and it was not the purpose of either exercise. We expect the forthcoming Ministerial consultation to provide clearer data and information on local preferences for structural options. This exercise will be conducted once local people and organisations have had the benefit of considering proposals. The survey feedback is as follows:

A total of 225 respondents (7%) gave active preferences in open text responses concerning which unitary council option they would prefer from the three proposed at the time of survey. Of these, 205 preferred a single unitary council governing

the whole county, 14 preferred the East/West option, and three preferred the Greater Gloucester option. Three people said they preferred two councils without specifying which option.

Implementation Roadmap

We've developed an implementation plan that sets out how Gloucestershire will move from submission of this proposal to Vesting Day and beyond. It's how we'll guarantee residents continue to access the support they need, safeguard statutory services, and lay the robust foundations for ambitious, ongoing transformation.

Whilst we continue to sharpen the details and map out specific activities, this section sets out our initial considerations and phases of activity. The key programmes set out in this section are likely to evolve over time as the national and local context and priorities change.

Framing our approach

Experience from previous LGR programmes highlights several factors that are critical to success for Gloucestershire:

- **Clarity of purpose:** a shared understanding amongst all organisations involved helps maintain momentum and alignment during planning and delivery, which will need to be undertaken collaboratively across all councils involved.
- **Early planning and mobilisation:** Early proactive planning (beginning before any MHCLG decision) is critical to manage delivery and improve implementation outcomes.
- **Robust portfolio and programme management:** LGR is complex and high stakes. We'll need a strong portfolio approach, with defined programmes, clear responsibilities, and the right resources in place to govern and manage delivery at pace.
- **Early appointment of senior leadership:** Recruiting into key posts such as the Chief Executive, S151 Officer, and Monitoring Officer early to provide leadership and stability.
- **Engagement and transparency:** Early, ongoing, and open communications is essential. Keeping staff, members, residents, and suppliers updated builds trust, enables proactive management of key risks, and provides confidence and reassurance to stakeholders.

Working together

All councils in Gloucestershire have agreed how they will work together in the run-up to MHCLG's decision and during the shadow period, ensuring that staff, members, partners, and residents remain confident in the process. Our shared principles are as follows:

Continue to involve all our staff proactively: we'll continue to keep staff from all councils actively involved in co-designing our journey to Vesting Day – drawing on their collective expertise to lead, design, and manage key LGR programmes.

Remain aligned around our shared future vision: we will stay focused on our shared vision for the new councils and make the most of our collective strengths.

Open and honest communication and collaboration: We will continue to be transparent about activities, challenges, and decisions - with no hidden agendas - and commit to working in partnership across all seven councils.

Aligned decision-making and transitional support: As Vesting Day approaches, we'll agree practically how significant financial and other decisions are made across each council, and how we'll support each other – so that every council delivers on its existing plans and commitments. The transition programme will include a draft shadow constitution, a combined MTFS, a risk register, and a costed investment strategy to guide transition.

Invest in core skills: We'll need the right people in the right roles. That means bringing together not just technical specialists, but also standout leaders in programme management, procurement, change, and digital transformation. We'll harness strengths already in our councils – and invest in new talent and capacity wherever its needed – to make sure Gloucestershire's transition is expertly led from day one.

Roadmap to Vesting Day

The roadmap to Vesting Day is structured across five clear phases aligned with indicative timelines, based on MHCLG guidance.

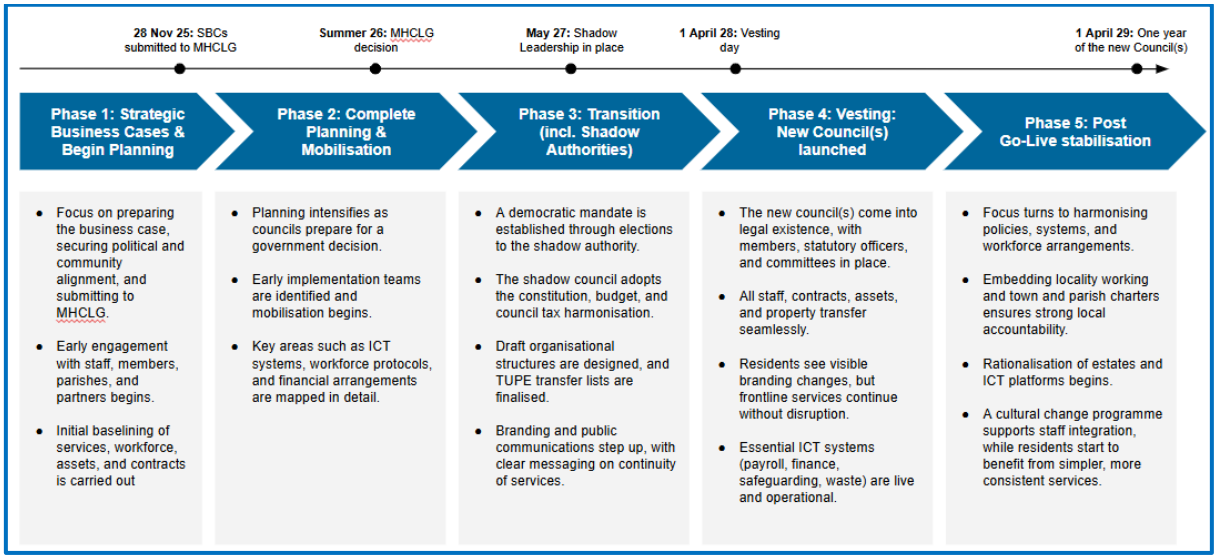


Diagram 4: roadmap to Vesting Day

High-Level Activities by Phase

Phase 1 – Strategic business cases (SBCs) and begin planning (to Nov 2025)

In this phase of work, councils focus on preparing and submitting the SBCs and starting to undertake preparatory baselining of key infrastructure across all seven councils (including workforce, assets, finances, policies, contracts etc). Continued engagement with staff, members, towns and parish councils, and partners ensures early buy in and alignment, which is critical for the coming months.

Some of the core activities in this phase will include:

- All seven councils in Gloucestershire will finalise and submit a SBC to MHCLG by 28 November 2025 (setting out all options for LGR that are under consideration)
- Each council will start to gather baseline data on current services, strategic risks, establishment data, assets, contracts, and vacancies to work towards a consistent baseline across all seven councils
- The joint LGR portfolio and programme management capability will be designed, setting out key roles, role profiles, and capabilities required including an overall LGR Portfolio Director
- A more detailed transition and implementation plan will be developed in line with the five key phases of activity
- Staff will start to be invited to join core LGR programmes (e.g. secondments etc) to support detailed planning and delivery work
- Councils will engage with town and parish councils to co-design a town and parish charter and initial governance approach

Phase 2 – Complete planning and mobilisation (Nov 2025 – Summer 2026)

Detailed planning will continue to take place while awaiting MHCLG's decision, particularly preparatory work which would be required irrespective of which option is chosen. The full LGR portfolio, including core programmes, will be mobilised, with staff in place to lead and deliver activities. This phase is crucial to ensuring alignment and clarity on how transition will be managed so that activities can progress at pace immediately after a decision is made.

Some of the core activities in this phase will include:

- Portfolio management capability in place and actively running
- All core LGR programmes stood up with staff in place (either from existing councils or through external support being brought in where required)

- Detailed planning will be completed in readiness for MHCLG's decision, including timelines for key decisions such as Enterprise Resource Planning (ERP) selection and resident contact channels on Vesting Day
- All seven councils will focus on cleaning data to get it into a consistent and complete format across areas such as staff (aligning with finances), contracts, systems, assets, strategic risks, existing policy frameworks etc. This will enable the development of a consistent Gloucestershire wide baseline of core infrastructure, service delivery, and risks, which will need to be managed by the new councils
- Implementation of Section 24 controls, as needed, to make sure significant financial decisions and contractual commitments made by the current councils do not adversely impact the new councils
- Development of options and policies for managing the HR implications of staffing changes, covering vacancy management, joint approaches to recruitment, redeployment approaches, senior staff implications, pay and grading harmonisation, and benefits harmonisation
- Discussions with trade unions on managing the HR approaches to ensure early and proactive involvement and challenge
- Development of a detailed communication and engagement plan (internal and external)
- Continued staff and partner engagement through communications and co-design opportunities to consider service aggregation and delivery model opportunities
- Starting to create a shadow authority decision log, including areas such as the new councils' budgets, council tax, and policy requirements
- Early engagement with suppliers to consider any potential implications of contract novation and other key supplier issues
- Draft design of neighbourhood governance, form, and function.

Phase 3 – Transition (Summer 2026 – March 2028)

Councillors will be elected to shadow authorities who will lead the transition - making important decisions on how the new councils will be governed and funded, and how council tax will be set. Behind the scenes, preparations will focus on getting staff, IT systems, buildings, contracts, and locality arrangements ready for Vesting Day. Communications and branding will help residents understand the changes and feel confident about what's coming.

Some of the core activities in this phase will include:

- Elections will be held (likely in May 2027) for shadow authorities which will, in turn, appoint key officers, approve the new constitution, set the budget, and decide how council tax will be aligned across areas
- Final TUPE staff transfer lists will be confirmed, and draft organisational structures will be developed and shared. Staff will begin to be recruited, trained, and sent letters confirming their roles, pay, and work locations
- The shadow authorities will also agree on the new council's values, branding, and communications plan
- Detailed service transition planning and service operating models will take shape, with aggregation and disaggregation implications
- Pay dates and staff benefits will be standardised in agreement with trade unions to ensure consistency before Vesting Day (critical for equal pay considerations)
- Senior leadership positions will be appointed, including Chief Executives, S151 Officers, Monitoring Officers and other key statutory roles such as Directors of Adults Social Care (DASSs)
- Asset and property registers will be updated, and health, safety, and compliance responsibilities clearly assigned
- Policies for transferring community assets and services will be developed (working alongside town and parish councils and the VCFSE)
- Engagement with suppliers will agree and formalise any contractual changes including termination, novation, and extensions
- Detailed design will progress for the key contact channels that residents will use on day one
- Neighbourhood Partnerships will be designed, costed and implementation underway
- A Town and Parish Councils Charter and a Civil Society Covenant will be finalised, and public-facing branding and communications stepped up, including the development of new websites for the new councils
- The councils' future operating models will be agreed, supported by a corporate plan that aligns services with strategic goals
- Financial support schemes, like council tax and business rate relief, will be aligned to ensure equity for residents
- Payroll arrangements for staff will be established
- The shadow authorities will review and sign off the MTFSs, investment plans, financial charts of accounts, and savings plans.

Phase 4 – Vesting: new councils launched (1 April 2028)

All current councils legally cease to exist on 31st March 2028. Staff, contracts, assets, and systems transfer to the new councils. Essential services continue without disruption for residents. Residents will see new branding but experience continuity in delivery of services.

Some of the core activities in this phase will include:

- The existing councils will formally cease, with all staff, functions, assets, property, and contracts legally transferred to the new authority
- TUPE transfers will be completed, payroll will run without disruption, senior staff savings will be realised, and members will take up their roles under the new constitutions with committee structures operational from day one
- All critical ICT systems - ERP, payroll, planning, ASC, CSC, safeguarding, waste, and the new electoral system will be live and stable (it is not anticipated that all systems will be aggregated / disaggregated on day one)
- Neighbourhood Partnerships will be live
- Staff will receive a new email address, but the majority will still be working on the same ICT hardware (laptops, phones etc) and from the same office locations on day one
- New phone numbers and email addresses for residents to contact the new councils will be live, with redirects in place on legacy contact channels
- New branding will be rolled out on tax bills, vehicles, uniforms, and signage to signal visible change and reassure residents the new councils are up and running
- Opening balance sheets will be agreed and predecessor accounts closed and audited
- Senior staff changes, including role realignment, redundancies, and benefits will be realised
- A high-profile public launch campaign will be delivered on day one and the immediate period thereafter to make sure there is appropriate awareness amongst residents, partners, and businesses.

Phase 5 – Post go-live stabilisation (April 2028 onwards)

In this phase of the programme, the focus shifts to aligning policies, systems, and workforce arrangements, embedding new ways of working, and delivering against the transformation opportunities identified to enable long-term design and delivery of the identified benefits.

Some of the core activities in this phase will include:

- Fees and charges will be harmonised through a single register
- Ongoing change management programme to embed new organisational values and behaviours, supported by engagement and communications with staff, partners, and residents
- Development and implementation of more detailed organisational structures (likely in a phased manner, aligned with service transition plans)
- ICT systems will be consolidated and rationalised over time, with cyber security and data governance strengthened
- Procurement policies will be harmonised and guided by a new supplier strategy, while estate rationalisation continues
- Customer service standards will be embedded consistently across services, supported by a FOM action backlog that drives harmonisation and redesign beyond day one
- Continued communications and engagement with all stakeholders including residents, partners, members, and staff.

Managing Delivery: Portfolio Structure

To oversee, manage, and deliver these transition and implementation activities, we will set up a robust portfolio and programme management structure.

Wherever possible, we would resource capacity and capability from across the seven councils by repurposing existing resources. There are likely to be certain capabilities or points during the five stages of the roadmap where we may need to bring in additional external capacity or capability to drive delivery at the pace required.



Diagram 5: LGR Portfolio Programmes

The scope of these 12 programmes could include:

Programme	Description
Communications, Engagement and Branding	• Internal and external communications and engagement strategies for partners, residents, staff, councillors • Design and agreement of new branding • Public launch campaigns • Monitoring effectiveness of communications with feedback loops to other programmes to act on sentiment and feedback.
Governance and Legal	• Design and adoption of the new constitutions and governance structures • Leading the legal establishment of the shadow authorities, including oversight of elections • Developing and embedding scrutiny arrangements • Legal transfer of functions and statutory responsibilities from predecessor councils • Policy oversight, ensuring that critical policies are in place for day one and that no decisions are taken that undermine continuity • Legal assurance for implementation decisions and considerations, including service specific considerations such as transfers of assets and contracts.
Finance and Risk	• New financial structures and charts of accounts • MTFSs, annual budgets, and statements of accounts • Implementation of Section 24 controls • Managing and delivering council tax harmonisation policies • Opening balance sheets and closure/audits of predecessor accounts

Programme	Description
	• Development and management of the strategic risk registers.
Performance	• Developing performance frameworks to measure delivery of the transition and implementation portfolios • Establishing metrics to track service continuity, staff engagement, ICT readiness, and financial stability • Management of the benefits realisation frameworks.
Property and Assets	• Property and asset implications, including rationalisation opportunities, development of asset and estate strategies, and investment properties • Consolidated asset and property registers • Ensuring health and safety responsibilities for all property and assets are clearly assigned • Supporting the transfer of ownership of all land, buildings, and property rights from predecessor councils • Delivering against the estate rationalisation programme ambitions.
Digital, Data and Technology (DDaT)	• Ensuring all critical ICT systems are operational on day one, including ERP, payroll, safeguarding, and operational service systems • Design, procurement, and implementation of new ERP systems • A new email address for all staff on day one • Ensuring legacy systems can integrate or run in parallel where required • Longer-term system harmonisation and embedding of cyber security and data governance practices

Programme	Description
	• Developing and delivering against data migration requirements from predecessor councils, with a focus on security and GDPR compliance.
Customer Contact	• Designing the customer journey for the new councils, agreeing the balance between online by default and other forms of access and engagement • Establishing clear customer contact points for Vesting Day, including phone numbers, websites, and email addresses • Ensuring legacy contact channels redirect residents seamlessly to new channels • Embedding consistent customer service standards across all services during the stabilisation period.
Development of the FOM (incl. service redesigns)	• FOM blueprints and implementation plans for the new councils • Where needed, supporting specific services (e.g. leisure) to manage aggregation/disaggregation implications and consider operating model choices.
People and Culture (incl. OD)	• Baselining workforce structures and establishments across all current councils • Redeployment and recruitment processes • TUPE transfers • Harmonisation of pay dates and benefits in negotiation with trade unions • Staff engagement programmes, including opportunities for staff to join LGR programmes and co-design services • Cultural change projects to embed new organisational values, identity, and ways of working.
Neighbourhoods and Communities	• Design, consultation, and implementation of Neighbourhood Partnerships, including elements

Programme	Description
	which relate to Neighbourhood Area Committee legislation • Policies for parish asset and service transfers • Towns and parishes engagement • VCFSE engagement • Town and Parish Charter and Civil Society Covenant (for both councils either jointly or separately) • Community engagement (non-geographic), including corporate and service approaches to resident and stakeholder engagement and participation.
Devolution	• Political and strategic engagement with senior leaders on long-term devolution options • Planning for potential strategic authority over the medium/long term.
Procurement, Contracts and Commercials	• Baselining of all contracts and external spend across all seven councils • Identification of key contracts for novation and engagement with suppliers • Harmonisation of procurement policies • Exploring further opportunities for commercialisation, joint arrangements, and income generation.

Table 21: the proposed scope of each LGR programme

Portfolio and Programme Management

A Portfolio and Programme Management team will be established to oversee, coordinate, and manage delivery of the implementation roadmap - anticipated to be in place until at least March 2029.

The team is likely to consist of a range of programme, transformation, and change roles, and will be at the heart of managing the overall transition and implementation portfolio. This includes:

- Detailed planning and management of progress
- Enabling consistency across all LGR programmes
- Supporting the overall governance arrangements of the portfolio
- Providing regular progress reporting and internal assurance
- Developing and delivering the benefits realisation plan
- Working closely with the programmes in the portfolio, including in managing risks and interdependencies.

Managing strategic risks

There will be a range of strategic, operational, and service level risks associated with transition and implementation. Strategic risks will likely include:

Risk	Potential Mitigation
Potential delay in Vesting Day timelines nationally - There is a risk that changes or slippage in the agreed national timelines for the LGR process will undermine our ability to plan and sequence key activities effectively. This could lead to misalignment across programmes, reduced stakeholder confidence, and delays in achieving critical milestones.	Establish clear checkpoints both with MHCLG representatives and locally to monitor timelines and make sure there is early notification of any potential delays or changes in national timelines particularly around Vesting Day.
Scale and complexity of change - The level of change involved for all seven councils is significant (e.g. changes to how residents are engaged, policies, processes, organisational structures, leadership and culture, new services being delivered etc) and needs to be	• Develop a detailed transition and implementation plan which enables a smooth transition (as far as possible) • Implement a robust portfolio and programme management capability as soon as possible to help manage and drive change,

Risk	Potential Mitigation
delivered and managed in very short timescales.	including managing interdependencies and risks.
Capacity and capability to support transition and implementation - There is a risk that we struggle to bring in the right capacity and capability to drive delivery alongside maintaining BAU service delivery for our residents and communities.	• Identify early the key resources required to enable successful delivery, including any subject matter experts. Engage with other councils who have been through LGR to identify resourcing needs • The seven councils to consider where existing resources can be redeployed or reprioritised to support transition and implementation, including opportunities for secondments into the LGR portfolio • Set aside specific funding as part of the overall transition investment to bring in additional external support where needed and support backfill arrangements.
Maintaining service continuity – Most service areas will be impacted by LGR and will need to be involved in supporting the portfolio (including service transition planning). There is a risk that service performance or continuity could be adversely impacted during transition or immediately post Vesting Day.	• Prioritise the principle of being 'safe and legal' on day one, with no resident experiencing a worse service than they do currently • Develop a prioritised service transition plan to manage the transition and transformation in a phased manner • Form early working groups for core service areas (across all seven councils) to undertake detailed transition planning - making sure any considerations for maintaining operational

Risk	Potential Mitigation
	service continuity can be managed e.g. systems access.
Financial sustainability - There is a risk that the transition budget is insufficient to cover unexpected or unforeseen circumstances or that the savings that have been identified cannot be delivered.	• Contingency has been built into the transition costs to account for unexpected circumstances • A clear benefits realisation framework will be established to track and manage benefits delivery • The portfolio and programme management capability will be responsible for making sure there is a tight grip on all costs and benefits associated with LGR, so any financial risks can be proactively identified and mitigated.
Alignment with key stakeholders - There is a risk that key stakeholders including staff, partners, members etc are not aligned with the vision for the new councils or experience change fatigue from the level of change and disruption they are going through.	• Establish early a clear communications and engagement strategy for all stakeholders and agree key messages for each group at different stages of the implementation • Involve stakeholders early on to help co-produce plans • Dedicated change management resource to help embed the change successfully • Investment in leadership and managerial development so that they are equipped to support staff and engage with partners.

Table 22: strategic risks and mitigations

Managing the aggregation and disaggregation of services

Transitioning seven councils into two new councils is a major undertaking - and keeping services running smoothly for residents is our top priority. This will require a high degree of service aggregation and disaggregation.

Aggregation

Aggregation means uniting services, systems, and teams into a single structure, unlocking better coordination, less duplication, and more consistent delivery across Gloucestershire.

We'll manage the challenges and opportunities presented from aggregation by:

- **Enabling services to lead design:** The people who know services best will shape how delivery changes - ensuring practical solutions and continuity for residents
- **Managing existing shared service and wholly owned company arrangements:** Shared services like Ubico, One Legal, and Publica already show the power - and complexity - of joint working. Where aggregation is straightforward, we'll keep it simple; where it's more complex, we'll manage the transition carefully, including TUPE and out-of-county partners, such as West Oxfordshire District Council
- **Considering data and system aggregation:** Consolidating IT and data platforms will drive savings (likely in later years) and consistency, but we know it takes careful planning and upfront investment
- **Keeping services local:** Even as we aggregate, we're committed to place-based delivery - tailoring services to local needs and making Neighbourhood Partnerships central to our approach
- **Strengthening our workforce:** Aggregation lets us pool talent, invest in skills, and create new career pathways - especially in high-demand areas like cyber, data analytics, and surveying
- **Driving prevention through integration:** By bringing together district and county services, like public health, housing, leisure, and planning, we can drive improved outcomes for residents, such as tackling the wider determinants of health at greater scale.

Disaggregation

Disaggregation involves separating services, systems, and teams that are currently delivered at county level so they can operate independently within the two new unitary authorities.

We'll manage the challenges and opportunities presented from disaggregation by:

- **Enabling services to lead design:** The people who know services best will shape how delivery changes - ensuring practical solutions and continuity for residents
- **Robust governance:** Oversight boards with senior leaders, technical experts, and service professionals will be in place to monitor progress, resolve issues, and keep decisions evidence-based and aligned with our strategic goals.
- **Clear, open communication:** Residents, staff, and partners get timely, accurate updates through multiple channels. We're committed to transparency, building trust, and inviting feedback at every stage.
- **Careful systems and data separation:** Disaggregating core systems, especially those containing very sensitive personal data such as ASC and CSC, requires meticulous planning and investment. We're prioritising secure, safe data migration and strict adherence to information governance.
- **Protecting specialist expertise:** Some services, like public health, rely on small teams of specialists. We're focused on maintaining this capacity and operational resilience as teams are split across two authorities.
- **Staying 'safe and legal':** Above all, we're keeping a laser focus on statutory responsibilities and clear accountability - especially for safeguarding vulnerable children and adults.
- **Managing demand imbalances:** We're planning for the different needs and pressures in East and West Gloucestershire. For example, higher ASC complexity and costs in the West and the challenge of maintaining critical, high-cost highways assets in both new authorities. Resource allocation and financial viability are front of mind.

Disaggregation of Fire and Rescue

The disaggregation of Fire and Rescue, prior to vesting of the new Councils, will be legally necessary in the 2UA scenario. It will involve the separation from the current County Council in governance, organisational, and financial terms. In this sense it is a very different disaggregation challenge than for other countywide services.

Given the organisational destination for Fire and Rescue will be outside of local government, a key mitigation may be to manage this disaggregation exercise separately from other LGR activity. In this way the very specific needs of Fire and Rescue over a period of change and possible instability can be given the focus needed.

Disaggregation Case Study: Adult Social Care (ASC)

Our engagement with service professionals, initial data analysis, and lessons learned from other councils made it clear that a shared service for ASC is unlikely to work in Gloucestershire.

A disaggregated model between East and West (over a period of three to five years to fully disaggregate complex contractual arrangements) is likely to be the most operationally and strategically viable delivery model.

This approach enables each new authority to recruit its own DASS and retain clear accountability for Care Act duties. In the long-term this is also likely to be more politically viable given shared arrangements require continued negotiation across two sovereign organisations who will have very different demand profiles for ASC, financial challenges, and potentially political priorities.

Early considerations for making ASC disaggregation work:

- **Minimising additional workforce pressures:** Social care is already stretched - across social workers, nurses, and care staff. Many specialist teams are small, e.g. quality oversight, reablement, and performance monitoring. Mitigation of additional workplace pressures is important, including consideration of equal pay and grading to avoid poaching and competition, and protect specialist capacity wherever possible.
- **Data and systems:** All ASC data and care records are held in LiquidLogic/ContrOCC. A clear plan for data migration and splitting of care records over time will be needed to manage data loss risks and ensure services continuity is not impacted.
- **Ordinary Residence (OR):** Ordinary residence determines which local authority is responsible for funding an individual's ASC. It's based on where a person usually lives, unless specific legal exceptions apply (e.g. placements arranged by a council). Given the West has a much higher demand for multi-decade, high-cost care packages for supported living, there is a baseline structural cost imbalance between the two authorities. This not only has significant financial implications but there are also operational considerations, as there is insufficient provision of suitable accommodation in the East of the county. The availability of staff and suitably priced supported accommodation in the West means that there are a disproportionate number of people living in supported accommodation in the West. There are legal, ethical, and human rights considerations, as well as logistical challenges, to ensure vulnerable residents placed in care are not being unduly moved to a different part of the county away from an area that is 'home' for them.
- **Strategic market management:** Councils have a statutory duty to manage their market so continuing to manage provider relationships and ways of

working is critical. Retaining clarity of messaging in an already fragile care market will be key for both authorities. Joint commissioning may still be needed to tackle supply challenges and maintain negotiating power with providers.

- **Hospital discharge and integrated care:** Gloucestershire Royal Hospital, located in the West, is the county's central acute site and is often the place from where individuals are discharged into placements that become their long-term homes. Both authorities must agree joint protocols for hospital discharge and integrated care pathways to keep people safe and services running smoothly.

Appendix 1: Vision and Ambition 'Personas'

CHARLIE'S BIO	
	Charlie is a 15-year-old student living in Parkend. His area has limited public transport and he feels disconnected from school and community life. His school engagement is low, and he is often absent or disengaged in class. With limited access to youth facilities, Charlie spends most of his time online, often unsupervised.
DESIRES	**CHALLENGES**
Charlie is digitally curious and likes learning and connecting with people online.	Emotional isolation, lack of trust in adults, feels invisible in the community, vulnerable to online radicalisation and has limited access to safe youth spaces.

BRINGING OUR VISION AND AMBITION TO LIFE

- ✓ By co-creating services that work for everyone, Charlie gains access to safe, inclusive digital and physical spaces shaped by young people like him.
- ✓ Digital services connect him to mentors and wellbeing resources, reducing isolation and offering healthy alternatives to unsupervised online use.
- ✓ Collaboration between community groups, schools and digital platforms helps rebuild Charlie's trust and sense of belonging.

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- Driving Breakthrough Innovation for National Resilience: Forest of Dean becomes a pilot site for 'Project Beacon', an initiative using AI-powered early intervention tools, leveraging expertise from the Golden Valley Cyber Hub in Cheltenham These tools spot early signs of disengagement and connect young people like Charlie to trusted mentors and support networks. Workshops, both in-person and online, build digital resilience across the county in partnership with schools, the police and industry.
- Creating Together: Inspired by Project Beacon, Charlie becomes involved with the Forest Voluntary Action Forum (FVAF). Working alongside community groups and local mentors, he helps design online platforms that promote resilience and peer support, as well as new youth activities that reflect what young people actually want. This gives Charlie a stronger sense of belonging, builds his confidence and ensures services are responsive to the needs of all generations.

THE V**ARMA** FAMILY'S BIO



Priya (34 years old) and Arjun (33 years old) live in rented housing in Cheltenham with their young son, Ravi (9 years old) who has additional learning needs. Like many families in the town, they are balancing work, caring responsibilities and the rising cost of housing.

DESIRES	CHALLENGES
Priya and Arjun are eager to retrain to another industry to better financially support the family. Ravi enjoys music and building things.	The family struggles with insecure housing, long assessment wait times and navigating the education, health and social care services. Priya and Arjun feel stuck in low-paid work and torn between caregiving responsibilities and pursuing career opportunities. Meanwhile, Ravi feels behind in school due to overstimulating environments and a lack of tailored learning approaches.

BRINGING OUR VISION AND AMBITION TO LIFE

- ✓ By co-creating services that work for everyone, Arjun and Priya can help shape flexible training and SEND support that fits their family's real needs.
- ✓ Using digital inclusion initiatives, Ravi has access to secure, joined-up learning tools that support his education needs both in and out of the classroom, and give his parents visibility of his progress.
- ✓ Through linking housing skills and innovation locally, Arjun and Priya can take up retraining opportunities without moving away or compromising Ravi's care

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- Using Data to Transform Transport & Services: Integrated data systems link Ravi's SEND support, the family's housing needs, and the parent's retraining. Because services communicate, the social care professionals are able to provide the Patels with proactive care. It is through this better data integration that Arjun and Priya are offered a suitable retraining programme through the Talent for Life initiative.
- Unlocking Talent, Skills & Housing for Inclusive Growth: Through linking housing, skills and innovation locally, Arjun and Priya can retrain in secure jobs while knowing Ravi's care and education are supported close to home. This gives Ravi access to new learning opportunities from tailored digital tools to his family's attendance at 'taster days' in local industries, helping him discover his own future pathway.
- Driving Breakthrough Innovation for National Resilience: Ravi discovers a passion for advanced manufacturing through hands-on activities at local skills hubs. With access to mentoring, modern equipment and real-world projects linked to clean energy and sustainable production, he is able to see how his interests connect to solving national challenges. As he grows up, these opportunities give him the skills and confidence to pursue a career in advanced manufacturing, contributing directly to Gloucestershire's role in building resilience for the United Kingdom.

MARGARET'S BIO



Margaret (82 years old) lives alone in a small flat in Gloucester City. She has limited mobility and digital literacy, and no nearby family. Before retirement, she used to work in a garden centre where she enjoyed advising customers on garden needs.

DESIRES	CHALLENGES
Margaret has a strong desire to be a part of the community and is willing to engage if supported.	While public transport is available, she finds it difficult to navigate without support and feels overwhelmed by the pace of digital change. This makes it hard to access services or stay socially connected. She feels forgotten by the fast-changing world around her. She wants to remain in her own home for as long as possible and her family need assurance that she can be safe and cared for.

BRINGING OUR VISION AND AMBITION TO LIFE

- Co-designed neighbourhood and health services reflect Margaret's needs and preferences, restoring her dignity and independence.
- Digital inclusion initiatives supported through LGR, give Margaret the confidence to use online health services and stay socially connected.
- Local community groups and health providers collaborate to bring companionship and tailored wellbeing support directly into her neighbourhood, reducing isolation.

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- Putting Wellbeing, Housing & Nature Recovery at the Heart of Growth: Every policy and service in Gloucestershire is shaped by a wellbeing-first approach, ensuring Margaret's needs are central. From transport to housing, decisions prioritise her dignity and independence helping her remain at home and part of her community. Over time, this creates a fairer community where ageing is fully supported.
- Empowering Communities through Co-Design & Local Decision Making: Margaret contributes her experience to a local Neighbourhood Partnership, shaping age-friendly housing ideas and intergenerational community projects. This gives her a place in the community while ensuring older residents' voices are embedded in local decision-making.
- Using Data to Transform Transport & Public Services: Trusted, real-time data links Margaret's health, housing and care needs, ensuring services coordinate seamlessly. Her GP and social care team receive the same up-to-date information, avoiding duplication and preventing issues from escalating. Her family also gets reassurance through regular wellbeing updates.

EMILY'S BIO



Emily (26) lives in Cirencester. She works part-time in admin and has caring responsibilities for her family. She is passionate about sustainability and wants to pursue a career in the field without leaving her district. However, she's not sure if that is possible within Gloucestershire. From her knowledge, she feels she needs to move to other areas like Bristol and London to access the opportunities she is looking for, an option not available to her

DESIRES	CHALLENGES
Emily wants to find flexible, on-the-job training opportunities that offers career mobility, alongside care support for her father so she doesn't have to compromise on her ambitions.	Emily struggles to find local green skills programmes that are flexible, adaptable to her schedule and will help secure her a job in the industry. She feels torn between her caregiving responsibilities and her aspirations.

BRINGING OUR VISION AND AMBITION TO LIFE

- Breakthrough innovation in clean energy and climate technologies creates local career pathways that allow Emily to stay close to her family while contributing to a globally significant sector.
- Collaboration across transport and training clusters connects her to opportunities in Stroud and Severn Edge.
- Digital tools support remote learning and flexible work, helping her balance ambition with caregiving.

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- ✓ Unlocking Talent, Skills & Housing for Inclusive Growth: Emily accesses flexible, online training tailored to her caregiving schedule, gaining credentials in clean energy. This allows her to build a local career in sustainability without sacrificing her family responsibilities whilst also connecting Emily to high potential sectors across the whole of Gloucestershire.
- ✓ Harnessing Digital to Tackle Inequality: Digital inclusion projects mean Emily can use high-quality online learning platforms and remote working hubs in the Cotswolds, supported by affordable transport to training centres for in-person learning.
- ✓ Driving Breakthrough Innovation for National Resilience. By linking into Gloucestershire's growing clean energy sector, Emily gains placements and mentoring that tie her personal goals to the county's contribution to net zero and energy security. Within a decade, she leads a flagship initiative promoting green fuel and zero-carbon mobility for visitors to the Cotswolds AONB.
- ✓ E**mpowering Communities through Co-Design and Local Decision Making:** Emily connects with peer support groups through local Family Hubs, finding access to wellbeing and respite care support. This provides visibility of a pathway for Emily to achieve her career goals and care for her loved ones.

RACHEL'S BIO



Rachel is in her mid-30s and lives in Bussage with her two children. She commutes daily to Bristol for her job in marketing. The journey is long and expensive, with poor rail connections. She spends hours in traffic and pays high parking fees in Bristol. She's considering remote work or relocating but loves her home and community in Stroud.

DESIRES	CHALLENGES
More time with family and friends, affordable and direct commuting options, local work flexibility. She hopes to grow her career, ideally without having to relocate.	Whether rail or car, Rachel's commute has caused her stress. She feels like she has little to no time to enjoy life during the weekdays. Her mother is currently helping with school pick-up but has expressed a desire to relocate outside of Stroud.

BRINGING OUR VISION AND AMBITION TO LIFE

- ✓ By shaping local transport priorities through local community forums, Rachel has a voice in decisions that directly affect her daily life. .
- ✓ Improved connectivity enables hybrid working, reducing the need for Rachel to commute daily.
- ✓ Smart mobility platforms give Rachel real-time journey planning, reliable timetables and targeted pothole repairs that make her routes safer and quicker.

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- Using Data to Transform Transport & Public Services: Strategic partnerships underpinned by employee migration data make the case for improvement in regional connections. This reduces costs and journey times for Rachel. Smart data systems also prioritise road maintenance and pothole repair, making daily travel safer and more reliable. Together, these improvements give Rachael a quicker, more affordable commute and more family time all while ensuring she can progress in her career.
- P**utting Wellbeing, Housing & Nature Recovery at the Heart of Growth**: Transport and housing are planned with wellbeing in mind. Rachel benefits from community facilities linked to commuting routes, making family and work easier to combine.
- Harnessing Digital to Tackle Inequality, Improve Services and Drive Innovation: Rachel uses digital platforms to plan hybrid working and smarter travel, helping her stay rooted in Stroud while keeping access to regional career opportunities in the sectors where she has the most skills.

DARREN'S BIO



Darren (52 years old) lives in Bishops Cleeve. Darren has been working hard to overcome addiction and is determined to build a new life. He wants to work and contribute more to his community but faces stigma and limited access to tailored employment support. He's proud of his recovery and seeks meaningful ways to stay on track and help others.

DESIRES	CHALLENGES
Darren wants a stable employment that can enable him to be financially independent. Inspired by the support he has received from health and social care professionals, he wants to contribute and give back to those in need.	Darren feels socially isolated and is conscious of being judged by others. He has yet to find a stable job in Tewkesbury that will give him financial security, causing him stress, which he fears may cause him to relapse.

BRINGING OUR VISION AND AMBITION TO LIFE

- Integrated services mean Darren can access recovery, housing advice and employment support in one place, removing the barriers he previously faced navigating separate systems.
- Local employers and VCFSE partners offer supported routes into meaningful work, helping Darren rebuild confidence while contributing to his community.
- Digital tools track Darren's progress and connect him to peer networks, reinforcing his recovery and helping him sustain long-term stability

TRANSFORMING OUTCOMES THROUGH OUR AMBITIONS

- ✓ Putting Wellbeing, Housing & Nature Recovery at the Heart of Growth: Darren accesses a new joined-up wellbeing and employment hub model that integrates housing advice, health support and training opportunities under one roof. Unlike existing services, the hub is embedded in local housing and regeneration projects, giving Darren stability in his home environment as well as tailored pathways into work. This integration reduces the stigma he's faced in fragmented systems and helps maintain recovery.
- ✓ Empowering Communities through Co-Design and Local Decision Making: Darren helps co-design recovery-to-employment programmes with local employers and VCFSE partners in Tewkesbury. His lived experience is treated as expertise, shaping more inclusive pathways that others in recovery can access. Over time, Darren takes on a mentoring role, feeding into decision-making that improves services county-wide and strengthens trust between residents and providers.
- ✓ Unlocking Talent, Skills & Housing for Inclusive Growth: Darren joins a reskilling programme linked to local employers, with wraparound housing and wellbeing support. He starts with part-time work at a social enterprise in Bishop's Cleeve, progresses into a supervisory role and ultimately secures a qualification that allows him to mentor others. By linking employment with social support, Darren's recovery is reinforced while also contributing to Gloucestershire's inclusive growth.

Appendix 2: Digital, Data, and Technology Case Studies

Digital, data, and technology (DDaT) are already transforming services across Gloucestershire – making them smarter, faster, and more joined-up. These examples show how a customer-centred, data-informed approach improves outcomes, reduces avoidable demand, and enables proactive service delivery.

Right now, delivery varies by council. But when applied across the new organisations, our DDaT approach unlocks consistent, high-quality services for everyone – wherever they live.

Case study 1:

Customer experience

Streamlining and opening up data through AI (Tewkesbury BC)

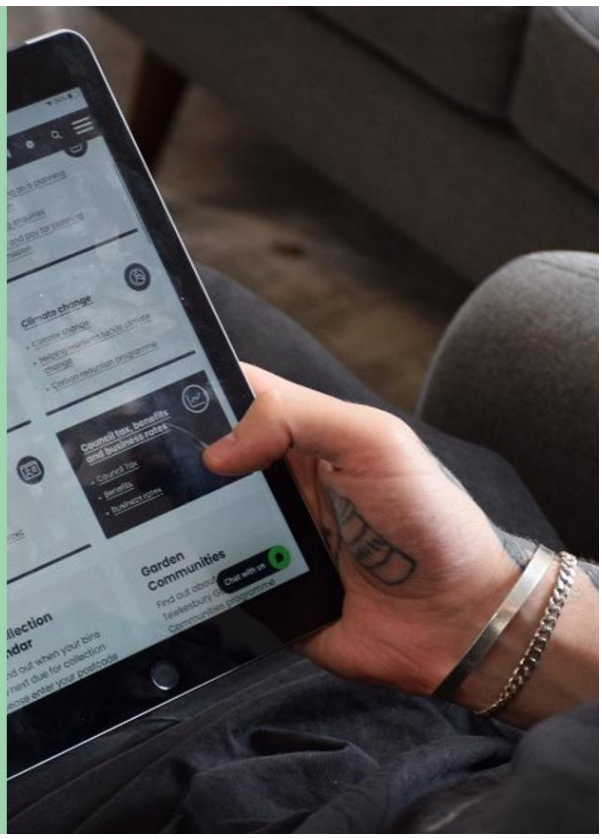
AI is redefining our customers' experience over the phone and online - there's no longer a need to navigate a lot of webpages or a maze of phone options (or to sit waiting on hold).

The customer types their issue into a responsive AI-driven chatbot online or speaks through a Large Language Model assistant over the phone (with a single phone number for all issues). If the issue is particularly complex, the customer seamlessly passes through to a human advisor who already knows why they're calling. If the teams are particularly busy, a simple call-back option is offered.

Residents are less frustrated, receive support quicker and have more confidence in contacting the council when they need help.

Real-time dashboards mean teams manage demand dynamically, and seamless integration into the council's digital platform means that customer contact can trigger automatic workflows depending on what they're contacting about.

50%	38%	17%
reduction in wait times in 6 months	shift to online services in 6 months	decrease in abandoned calls in 6 months





Case study 2:

AI virtual care

Helping vulnerable residents live in their own homes for as long as possible (Gloucestershire CC)

Innovative AI-powered virtual care will help transform how social care is delivered. Using smart plugs, motion sensors and other remote devices installed in residents' homes to monitor daily activity and wellbeing.

Devices feed data into a technology-enabled care system (recently procured by Gloucestershire CC), which uses AI to detect changes in behaviour that may signal a health concern.

The proactive approach allows care teams to intervene early – before a crisis occurs. In Sutton, this has led to around 25 residents per month being supported by community response service, avoiding ambulance callouts and hospital admissions.

The technology supports residents to live independently for longer, with the reassurance that help is available 24/7. It also eases pressure on overstretched adult social care services.

Case study 3:

Bulky waste

Reducing demand by keeping customers updated (Tewkesbury BC)

Bulky waste bookings take place through an intuitive online booking system – no need to call or visit (although that option is available).

The online experience is really enjoyable. Information is clear and there's a basket for items to be added, and an integrated payment system – nowhere close to the traditional clunky online local gov experience. Residents get to choose a collection date that suits them from a calendar of availability.

Through automated communications, residents are kept informed at every stage of the process - from booking confirmations to collection updates. These messages, delivered via email and text, are clearly branded and consistent with the council's digital identity.

Live data integration allows collection crews to update the system in real time, enabling customer services to respond swiftly to any queries.

Similar proactive approaches will be used for missed bin reports, planning applications and many other services.

In six months:

60%	70%	261%
collections booked online	of items now recycled	rise in income





Case study 4:

Open Digital Planning

MHCLG-funded programme to improve planning online (Gloucester City and Tewkesbury BC)

MHCLG's Open Digital Planning is transforming the planning service through systems that reduce invalid applications, improves customer experience and streamlines internal processes.

Plan X uses spatial data to assess site-specific constraints and guides users online through a tailored, question-based journey. This empowers applicants to self-serve, reducing calls to the council and improving the quality of submissions.

Through further development the system will integrate with Idox Uniform, enabling applications to be submitted directly and automatically populate back-office systems.

Gloucester City is also part of Back Office Planning System (BOPS), which is being developed with planning officers to improve the planning process - their input will help shape the system ensuring it meets the needs of planning officers and reduces the double handling and outdated processes in legacy back office systems.

- **Plan X:** Avg 113 visits per week for 'do I need planning permission?' tool (Glos City and Tewks BC).
- **BOPS:** 20% reduction in householder application processing time (Glos City).
- **Plan X:** Ratings of 'excellent' and 'good'.

Case study 5:

Flooding

Using spatial data to protect vulnerable residents (Tewkesbury BC)

A data-informed approach helps keep flood-risk communities and vulnerable residents safe.

With the introduction of a new digital system in ArcGIS, we can capture information quickly and accurately. Integrating satellite imagery with other datasets (such as the EA river gauge imagery and rainfall) means we can create predictive models of flood extent and impact.

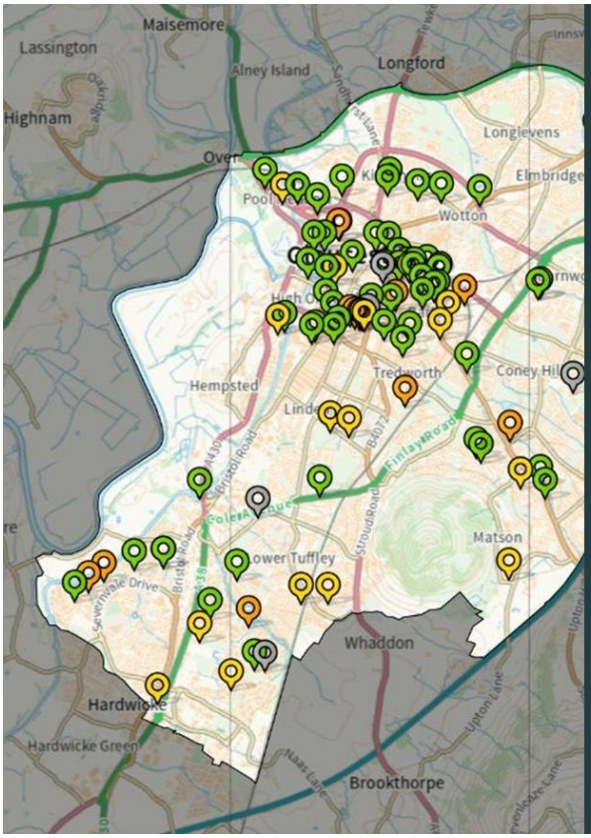
We know what different river levels mean on the ground, and mapped data will show where to direct support, such as:

- Where sandbags and rest centres are best located
- Which householders require targeted alerts and information
- Which vulnerable residents need welfare checks

This approach isn't just about reacting, but about being proactive in supporting at-risk communities.

LGR will enhance this approach even further by enabling a unified, cross-county view of flood risk and response. It allows for the consolidation of data sources from county and district councils, streamlined decision-making, and coordinated deployment of resources - ensuring that support reaches the right places faster and more effectively.





Case study 6:

Fix My Street

Fix My Street, a simple, map-based tool, lets residents report issues like potholes, fly-tipping, and broken streetlights via the web or mobile app.

Users drop a pin, add details and photos, and the report is sent directly to the right team—whether that's the City Council, UBICO, or the County Council.

The system links with in-cab tech, asset layers, and back-office systems to ensure accurate routing and real-time updates for crews. A public map shows reported issues and progress, improving transparency and removing the need for users to understand council responsibilities.

This streamlines service delivery, reduces call volumes, and improves the quality of reports across multiple authorities.

- City council: Average time to resolve issues dropped from **5.25 days** (previous process) to **1.25 days** with FixMyStreet and Alloy integration.
- GCC and city council: Of 198 city council cases reported to the county's FixMyStreet, **100% were automatically routed** to the city council **without any manual intervention.**
- GCC: **60% of highways issues** now reported through FixMyStreet – an increase of 20% on old process.

Case study 7: CoPilot

Gloucestershire CC: Average hours saved per week on different activities using M365 Copilot



Future Gloucestershire
Digital, Data and Technology workstream

Hours saved per week based on feedback received from 127 users

Appendix 3: Public Engagement Report (Cratus)

Cratus group

We're more than an agency.
We're change makers.

Gloucestershire Local Government Reorganisation Public Engagement

August 2025

Executive Summary

Between July and August 2025, Cratus Group engaged residents and stakeholders across Gloucestershire to gather views on Local Government Reorganisation (LGR). The programme combined 12 in-person events, two countywide webinars, and a countywide survey which in total generated more than 3,100 responses. A dedicated microsite and multi-channel campaign ensured broad reach across all six districts, though younger residents were notably under-represented.

Residents expressed a strong sense of belonging to their communities, with green spaces, safety, and access to essentials like buses and GPs ranked as the most important local priorities. Council services such as rubbish and recycling, libraries, and parks were generally well regarded, while roads, pavements, buses, and aspects of social care received lower satisfaction ratings. Respondents experience of engaging with councillors and/or council officers was relatively positive.

When considering the future of local government, most respondents prioritised making services better and ensuring council tax is well spent over issues of identity or representation. Community identity, transport infrastructure, housing, and environmental protection were the most commonly prioritised themes in the additional written feedback. Many residents are wary of change, as shown in the written feedback and noted in our conversations. In terms of those who gave a preference as to which model they felt would work best, a single countywide unitary was by far the most supported option. The East/West split and 'Greater Gloucester' model were widely opposed, with concerns about fairness, division, and efficiency.

The next stage of communication should focus on reassurance: showing that local voices and identities will not be lost, underlining the financial and service benefits of change, and clarifying how the new system will work in practice. Simplification of council responsibilities is a persuasive message, but trust will depend on continued engagement and transparency throughout the process.

Introduction

This report summarises the engagement activity undertaken by Cratus Group in Summer 2025 on behalf of Gloucestershire councils around the future of local government in the county and sets out an analysis of the feedback received.

Please note that throughout this report, for brevity, we use the term 'district' to refer to city, borough and district councils in Gloucestershire. Percentages are rounded to the nearest whole figure for neatness.

Background and context

The Local Government Reorganisation (LGR) community engagement programme in Gloucestershire was initiated to gather views from residents, stakeholders, and partner organisations on the future shape and priorities of local government in the county. This work forms an early stage in the process of developing proposals for submission to Government in November 2025.

The aim was to engage communities across all six districts, ensuring that a broad range of voices contributed to the discussion. Importantly, this engagement did not ask people to choose between fixed options or vote on pre-defined models. This will be the focus of formal Government consultation during the early part of next year. Instead, it invited open conversation about the principles, priorities and values that matter most to people in Gloucestershire.

By building understanding and listening to what communities have said they want and need, the engagement sought to generate insights that will help inform decision-making later in the year. The process was designed to be transparent, inclusive and accessible, ensuring that residents could help inform the county's future governance arrangements.

Objectives

- To inform residents about the context for potential changes to local government in Gloucestershire and the reasons for exploring these changes.
- To understand people's priorities, values and concerns in relation to the organisation of local government and the services it provides.
- To engage as widely as possible across all districts, reaching communities in both urban and rural areas.
- To gather insight that can be used to support councils in the development of proposals for submission to Government in November 2025.

Methodology

The engagement was undertaken using a hybrid approach, combining online and face-to-face engagement to ensure broad coverage and accessibility.

We followed the principle of 'going where the people are', integrating with existing community events and venues to reach a diverse cross-section of residents, while also providing digital channels for those who preferred to take part online.

In person engagement included a set of materials summarising the changes and signposting to the survey.

Survey

A county-wide survey was the central element of our public engagement. Hosted on Gloucestershire County Council's Engagement HQ platform, and developed with input from all seven councils, the survey included a blend of closed and open questions. This approach allowed for both quick responses and more detailed commentary.

- ✓ The survey was open to the public from **1 July to 8 August 2025**.
- ✓ The full list of questions is available in Appendix 1.

Engagement and demographics

We achieved high levels of engagement, with over 3,000 responses received. The demographic reach was also strong, with the distribution across most categories closely aligning with the general demographic makeup of the county of Gloucestershire, with the caveat that women were slightly over-represented (53% vs 51% in the 2021 Census) and the respondents skewed slightly older than the general population (33% over-65 vs 22% in 2021 Census). This suggests a broad range of residents chose to participate.

It is important to note that a digital survey of this nature is a self-selecting process rather than a representative poll. This means that people chose to engage with the survey, whether they found it online via social media or council content, or participated in person with a member of our team. Unlike a representative poll, we did not actively contact individuals with the aim of reaching a

statistically significant and truly representative sample of the county's or districts' populations. This was not feasible within the project's scope, budget, or timeframe.

Despite not being a statistically representative poll, we are confident that the feedback is robust and highly useful. The high level of engagement and the broadly representative nature of the respondents' demographics mean that the data provides clear and valuable trends. This feedback is therefore a reliable resource for councils as they develop local government reorganisation (LGR) options.

Note: While the data aligns broadly with 2021 Census data for the county, this has not been assessed at a District level so we cannot assert that the views expressed are representative of individual Districts.

The survey achieved good, useful results at a fraction of the cost and time a full-scale representative poll would have required, proving to be an effective and efficient engagement tool within the project's constraints.

Microsite

A dedicated microsite – www.futuregloucestershire.gov.uk – was created to provide background information on LGR, answer frequently asked questions, and list details of upcoming engagement events and webinars. It also provided a direct link to the survey, ensuring a single point of access for the public.

Outreach and marketing

To maximise reach, the survey and microsite were promoted through a range of channels:

Elected members and council officers
Councillors and officers received information to share with their networks, including a set of informational banners and flyers provided for each district council. Staff across district councils and partner organisations were reached through newsletters and intranet posts.

Gloucestershire County Council officers attended the parish and town council AGM in July to share information.

Residents and community networks
Social media activity included both organic and paid campaigns. Paid advertising targeted postcodes with lower response rates during the final two weeks of the engagement.

Posts were shared by each council's communications team via Facebook, Instagram, X, LinkedIn and Nextdoor, alongside digital newsletters, community bulletins and business mailing lists. Flyers were also sent to libraries and other council owned buildings across the county.

Events and webinars
In-person engagement took place at two existing community events in each of the six districts, and two online webinars were held to enable countywide participation. All activities were designed to ensure residents could access clear information, ask questions, and provide feedback in a way that suited their needs.

Engagement summary

As a result of online promotion, 12 in-person events (two per district) and 2 online webinars with countywide attendance, 3,112 survey responses and 1,480 written comments to open-text questions, providing rich qualitative insight, were received.

Events brought conversations into the heart of communities – from busy market towns to rural villages, whilst the online offer ensured residents could take part at any time. This mix of formats generated a balanced evidence base: hard data from the survey for statistical analysis, and detailed personal perspectives from written feedback.

Engagement findings

Events

The 12 events are detailed in the following section, with approximate figures for the engagement at each.

Teams attending the events had flyers to hand out, pull-up banners at the stands, and activities to attract people's attention.

People attending the events were encouraged to complete the survey, but discussions also provided useful insights into opinions on council services. Key findings are summarised below. People were encouraged to take flyers home, both as a reminder to fill out the survey themselves and to share with family, friends and neighbours, as we emphasised the desire to reach as many residents as possible.

Stroud Show

Saturday, 12 July – Stroud district

~ 15 Surveys ~ 40 conversations ~ 70 leaflets handed out

The audience was largely local to Stroud, and local councillors and district leadership were also in attendance. Many people felt that the local voice would be lost under LGR reforms, and they weren't supportive of change. However, many acknowledged that the different levels of local government now were confusing.

Quite a few specifically mentioned that they liked their Parish Councils. Residents complained about the lack of buses and public transport. A few discussed personal council issues.

Gloucester Quays Shopping Centre Pop-up

Saturday, 12 July – Gloucester City district

~ 8 Surveys ~ 50 conversations ~ 30 leaflets handed out

Feedback varied from disinterested to well-informed. Some attendees reported themselves as being from Gloucester, and identifying as such, but actually living within Stroud or Tewkesbury council areas.

There was some concern that unitary councils would not recognise the individual places that have their own unique identity under current arrangements. There was also a concern that any authority which contained Gloucester would have their resources diverted to the city. More broadly, there was a limited understanding of the difference between the levels of government and some disinterest in how services are delivered.

Coleford Music Festival

Sunday, 13 July – Forest of Dean district

~ 4 Surveys ~ 25 conversations ~ 15 leaflets handed out

Conversations tended to focus on very local issues including the role of Town and Parish Councils, noting that the Coleford Town precept had gone up dramatically in recent years. All residents spoken to wanted to maintain the identity of the Forest of Dean as a unique place and were not supportive of any option to become a unitary council.

Some councillors had been to the parish event on the 12th and were keen to understand more about what other authorities were doing elsewhere in the country. There was some feedback that the northern part of the Forest of Dean faces toward Herefordshire and could benefit from becoming part of that authority.

Moreton-in-Marsh Market

Tuesday, 15 July – Cotswold district

~ 21 Surveys ~ 25 conversations ~ 36 leaflets handed out

The busy market had a large tourist presence, making it harder to reach local residents. To counter this, the team engaged stallholders and shop staff directly. This approach ensured meaningful conversations with those living and working in the area.

Generally, there was a lack of trust of Cotswold District Council, partly due to the market stall holders themselves not having a positive experience when dealing with council officers. Aside from this, one of the biggest issues facing local people seemed to be with buses as some routes are being reduced or stopped altogether.

Regarding LGR, most were not aware this was happening but once explained, understood the reasons for the changes. Most were pleased with the idea it could lead to more effective and efficient councils.

Lydney Community Day

Saturday 19 July – Forest of Dean district

~ 2 Surveys ~ 45 conversations ~ 30 leaflets handed out

Feedback reflected concerns that the Forest of Dean is already overlooked for investment and that Lydney, on the edge of the district, is even more marginalised. Local transport limitations and dependence on cars were raised.

The ‘Greater Gloucester City’ model was criticised as exclusionary. Residents feared that roads and services would be deprioritised in favour of higher-traffic areas. A young carer noted potential benefits if services became more joined-up.

Councillors expressed opposition to reorganisation, with some arguing the county/district system should remain. Other comments touched on roadworks coordination, declining community events, and the importance of youth engagement.

Churchdown Summer Fun Day

Saturday, 19 July – Tewkesbury district

~ 1 Survey ~ 25 conversations ~ 15 leaflets handed out

Residents voiced concerns about historic boundary and naming issues, stressing Churchdown’s distinct identity from Gloucester and Tewkesbury. Some frustration was expressed that the process was not consulting on whether reorganisation should happen at all.

The general sentiment was that change felt imposed and unnecessary, though residents still engaged with engagement materials. Issues raised included access to waste facilities and representation.

Cirencester Town Centre Pop-up

Sunday, 20 July – Cotswold district

~ 5 Surveys ~ 20 conversations ~ 15 leaflets handed out

Engagement included younger shop workers and local business owners. Leaflets were displayed in shops and community spaces.

Residents asked about potential combined authorities and whether reorganisation was required by national government. Concerns were raised about losing local identity, confusion over service responsibilities, and how planning could adapt to different topographical needs.

Tewkesbury Market

Wednesday, 23 July - Tewkesbury district

~ 35 Surveys ~ 40 conversations ~ 10 leaflets handed out

Residents valued Tewkesbury's historic identity and stressed the importance of a localised response to flooding. While many saw opportunities for improved efficiency under reorganisation, concerns were voiced about differences between districts such as the Cotswolds and Gloucester and what this would mean if the local authority areas were combined.

Gloucester City Centre Pop-up

Friday, 25 July – Gloucester City district

~ 30 Surveys ~ 50+ conversations ~ 10 leaflets handed out

This high-footfall location enabled engagement with a broad mix of residents. Safety, cleanliness, and homelessness in the city centre were key concerns, particularly from younger respondents.

Issues raised included a shortage of affordable housing, the use of hotels for temporary accommodation, and the pressures of migration on housing. Calls for more youth facilities, investment in health services, and stronger support for tourism were common themes.

Greenways Fun Day

Saturday, 26 July – Stroud district

~ 10 Surveys ~ 40+ conversations ~ 6 leaflets handed out

Residents voiced concerns about east–west divisions in the county creating inequalities. They called for prioritisation of affordable homes for young people and better responses to anti-social behaviour.

As a busy, family-friendly event, it was harder to focus people on doing the survey then and there but there was a lot of interest and people took photos of the materials and/or scanned the QR code to follow up later.

Cheltenham Town Centre Pop-up

Saturday, 2 August – Cheltenham district

~ 36 Surveys ~ 40+ conversations ~ 33 leaflets handed out

Engagement was steady throughout the day, with neutral or positive views towards reorganisation in the majority. Issues raised included concerns over council tax, immigration, potholes, and buses.

Awareness of local councillors was generally low, and most had not contacted council departments in recent years. Some raised issues with local SEN support.

No Child Left Behind Festival

Wednesday, 6 August - Cheltenham district

~ 37 Surveys ~ 30+ conversations ~ 22 leaflets handed out

The family-focused event drew strong engagement. Activities at the stand encouraged conversations with parents and carers.

Recurring issues included poor road and street maintenance, lack of awareness of councillors, and concern that a county-wide unitary would erase local identity. Some welcomed the idea of area forums to retain local voices.

Webinars

Two webinars took place, on 5 and 6 August, one held during the working day and the other during the evening, allowing for different people's schedules. Both events were advertised across social media channels by all the councils. A recording of the presentation was then hosted on the www.futuregloucestershire.co.uk website for those who could not attend.

The main sentiment from the Q&A portion of the webinar was requests for more details on exactly how the process will work, from questions about which council buildings will be kept to details on how departments will be organised and who will be responsible for policies.

The structure of local government beyond district and county level was raised, with several queries about how the potential combined authorities and mayoral areas will be organised, and on the other side, how this will affect Town and Parish Councils. It became clear that attendees had heard rumours about how both could work, including the concern that parishes will be given further responsibilities without more resources.

We learned that residents will need reassurance throughout the process. People were concerned about things like how council housing will work, whether libraries will be affected, whether staff are at risk of losing their jobs, and where council offices will be.

Also, a couple of comments concerned future updates, while attendees were happy to hear that the details were still not finalised, they were keen to hear the results of the survey and details as they emerge – so Gloucestershire councils must keep up the good momentum of engagement and information sharing.

We had 71 attendees across the two days (45 on Tuesday, 5 August and 26 on Wednesday, 6 August). The audience was a mixture of residents, council staff and councillors from all tiers of council.

Unlike some in-person conversations and the survey results, webinar attendees did not request that the status quo remain. This shows that if it is clearly explained then people do understand that LGR is a national government requirement, and change will be taking place. Attendees commented that they found it helpful and were grateful for the engagement.

Survey results

Demographics

The survey gathered demographic data from respondents so we could assess how representative the respondents were of Gloucestershire's population. Where possible, this has been reviewed against the 2021 Census data.

The key demographic findings are as follows:

Age: The majority of respondents were aged 55 and over (57%), followed by those aged 35-54 (30%), and under 35 (9%). Gloucestershire does have an older population than the national average, however given that the figures for 65+ at a county level are 22%, the survey responses skew to an older demographic than is fully representative.

Sex and Gender Identity: The respondents were almost evenly split between female (53%) and male (47%), with a slightly higher number of women than men responding, slightly higher than the census data which has 51% female. Almost all respondents indicated that their gender identity is the same as their sex at birth.

Sexual Orientation: About 80% of respondents identified as heterosexual/straight, which is less than the census data which 90% identified as such. Smaller proportions identified as asexual (~3%), bisexual (~3%), gay man (~2%), or lesbian/gay woman (~1%). The number of respondents identifying as LGBTQ+ was higher among under-35s (16%) compared to those aged 55 and over (less than 4%).

Ethnicity: The largest ethnic group was White British (87%), followed by White European (4%) and White Irish (1%). Other individual ethnic groups each accounted for less than 1%. This is reflective of the demographics of the county (based on the 2021, 88% of the population is White British with a further 5% coming from other White backgrounds).

Religion or Belief: The most common responses were 'No religion' (46%) and 'Christian' (44%). 'No religion' was more prevalent among under-35s, while 'Christian' was more common among older age groups, reaching around 62% in those aged 75 and over. The county levels for 'Christian' are higher at 48%, and lower for 'No religion' at 43%.

Long-term Illness or Disability: About 19% of respondents reported having a long-term illness or disability that limits their day-to-day activities, less than the census figure of 23%.

Caring Responsibilities: Approximately 20% of respondents had caring responsibilities, mainly for older family members (15%). A smaller proportion (4%) cared for children with additional needs, and around 1% had dual caring responsibilities. This is higher than the census' average of 9% providing unpaid care.

Survey responses in detail

Section 1: A sense of belonging

This section of the survey focused on where people lived and where they identified as 'home' within the county. Respondents were asked for their postcode (first half only), which councils they

thought represented them, and where they consider they live. The latter was to determine whether people's local identity is more closely tied to the county, district, or local neighbourhood.

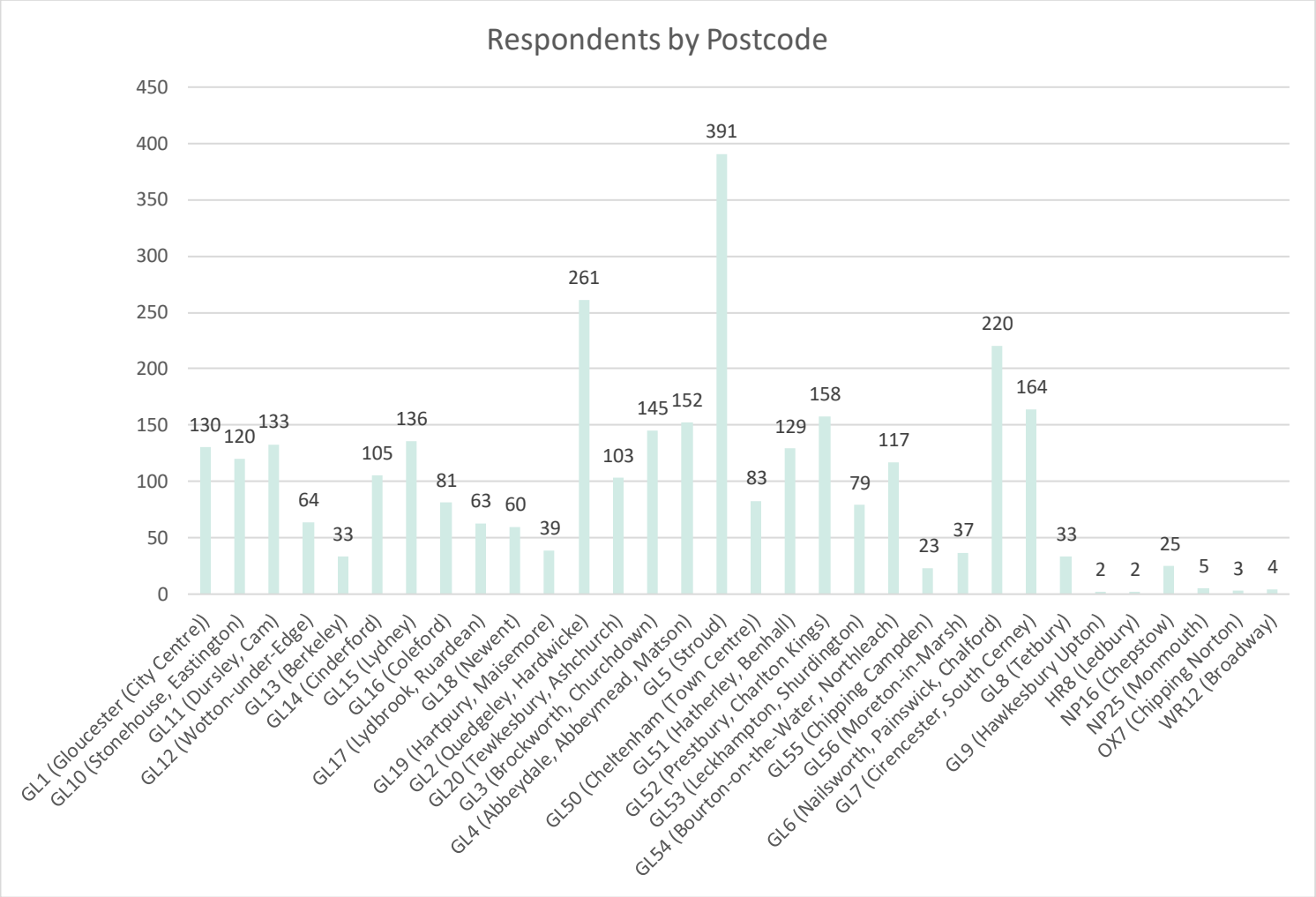


Figure 1

Figure 1 shows the distribution of respondents across postcodes and the most commonly associated areas within the postcodes. There is notably high turnout from GL5 (Stroud), GL6 (Nailsworth, Painswick, Chalford), GL7 (Cirencester, South Cerney), GL52 (Prestbury, Charlton Kings), GL4 (Abbeydale, Abbeymead, Matson) and GL3 (Brockworth, Churchdown).

Eleven respondents gave a hometown postcode outside of Gloucestershire, explained by the fact some lived on the borders or visited the county for work. Those postcodes were: GL9, BS37, IP2, GL20, GL8, GL12, OX7 and TA1.

People were asked to select their council, with the option of all six districts, the county council, and 'other.' 52 (2%) were not sure which council they were served by, indicated by either selecting 'not sure' or by selecting multiple district councils. However, we were able to allocate all except seven using the postcode and description of where they live for the purpose of effective survey analysis.

1,012 (33%) included Gloucestershire County Council as part of their answer, with 15 of those placing it as their only council. This shows that 2,090 (67%) respondents either do not realise this is their council or do not see it as much a part of their day-to-day life as their district council.

As shown in Figure 2, the districts were relatively evenly represented in responses, except for Stroud District Council which saw a considerably higher response rate.

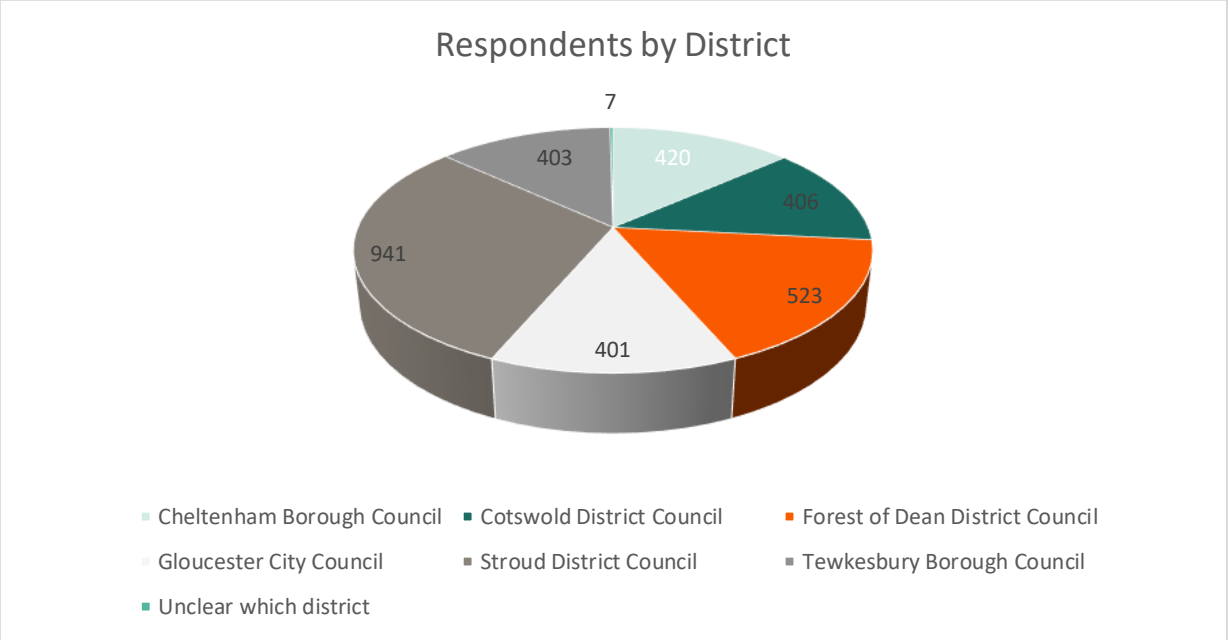


Figure 2

34 people added a council after selecting 'other'. Of these, 23 were Parish Councils and 11 were councils outside of Gloucestershire County Council lines (e.g. South Gloucestershire, Wychavon, West Oxfordshire, Malvern Hills, Somerset and Ipswich).

Next, people were asked to tell us first where they lived (Figure 3) and then what they considered to be their 'local area' (Figure 4). The word-clouds below summarise the most common responses to each.



Figure 3

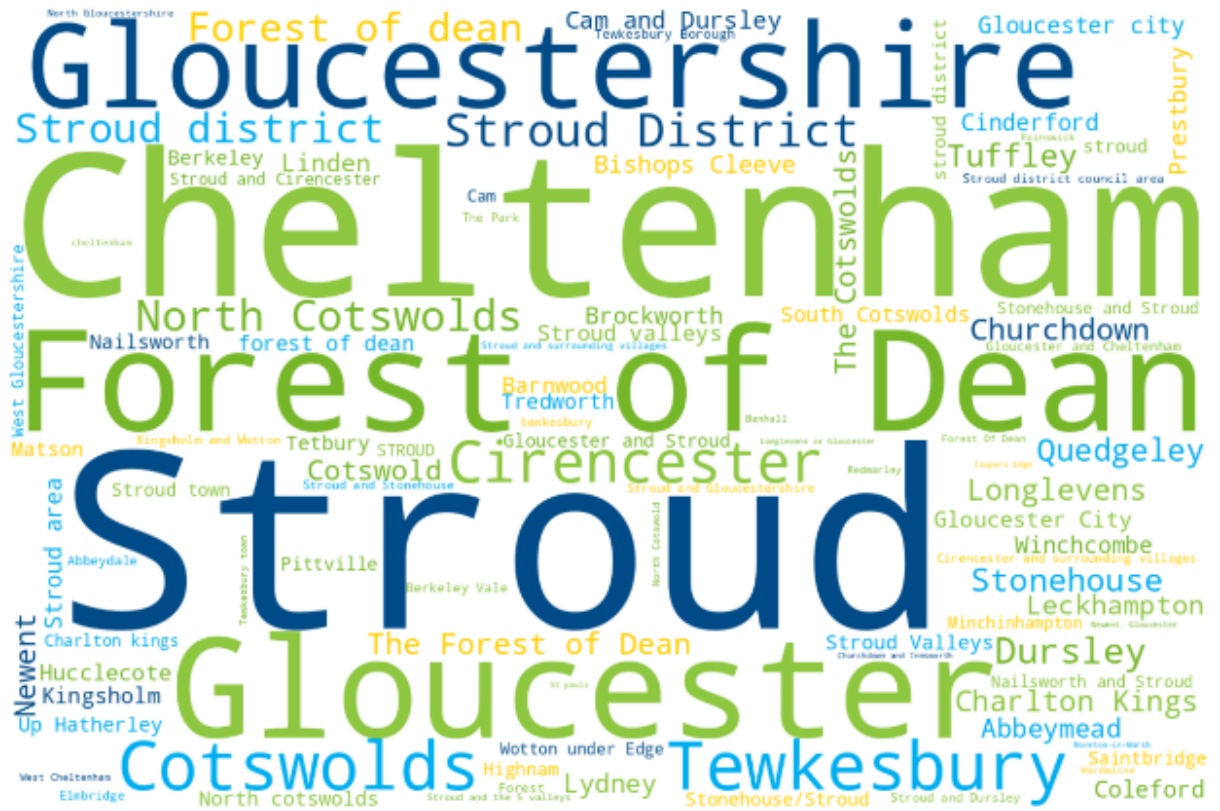


Figure 4

These two questions were designed to get people thinking about where they feel most connected to, rather than thinking solely in terms of council boundaries. The results show that people are

more specific when thinking about where they live vs what is their local area, and that while the district names are mentioned frequently, hundreds of smaller towns and villages are included, suggesting people's sense of home is more complex than which district or county they belong to.

We then asked people to what extent they felt a 'sense of belonging' to the local area they just identified. The responses to this question were overwhelmingly positive, with 1,503 (48%) saying strongly agree, and only 218 (7%) either disagreeing or strongly disagreeing (shown in Figure 5).

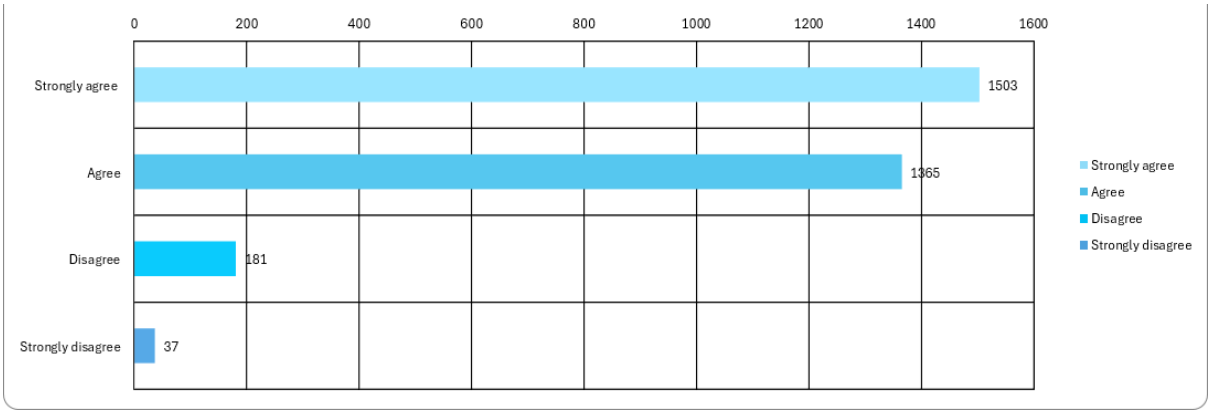


Figure 5

We then asked respondents to rank the importance of various key factors in contributing to this 'sense of belonging'.

Overall, green open spaces were rated as the most important element, with 72% saying they were 'very important'. Safety was the next priority, with 70% rating it very important, followed by 65% saying 'easy to get to important things like buses, schools and the GP' were very important.

Only 40% said history and heritage was very important to them, however overall, all elements were seen as more important than not important. 9% said events were not at all important, and this was the highest percentage of all 'not at all important' rankings.

Section 2: Council Services

In this next section of the survey, respondents were asked for feedback on their council services as they are now, including assessments of a series of council services and feedback on their engagement with councillors and officers.

Overall, 2,215 (71%) know who their councillors are, and 1,045 (34%) have contacted them in the last two years. 77% were satisfied or very satisfied with the response from their councillor.

1,904 (61%) have contacted a council department, and 73% were happy or very happy with the response from the relevant department.

In terms of services provided, rubbish and recycling and parks and green spaces consistently receive a high positive sentiment across all councils, while roads and pavements are the weakest area – in almost every council, these saw the lowest 'very good' ratings and highest negative feedback.

Residents across all councils received good ratings on average, with little differentiation between the six districts.

Overall average satisfaction per district (rated 1–4 scale):

Cheltenham Borough Council: 2.89
Cotswold District Council: 2.70
Forest of Dean District Council: 2.72
Gloucester City Council: 2.81
Tewkesbury Borough Council: 2.87
Stroud District Council: 2.86

Each council's individual feedback figures are summarised below:

Cheltenham Borough Council

420 responses were from residents in Cheltenham Borough Council. Table 1 shows how respondents from Cheltenham ranked the council services. Key things to note are that parks, gardens, and other green spaces were the highest rated, with 93% 'very good' or 'good', and roads, pavements, and streetlights were rated the lowest, with only 2% rating them as 'very good' and 76% as 'not good' or 'not very good at all'.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	32%	55%	9%	4%
Roads, pavements and streetlights	2%	21%	48%	28%
Parks, gardens, and other green spaces	40%	53%	6%	1%
Schools and education	23%	69%	6%	2%
Libraries	22%	60%	15%	4%
Sports facilities/festivals/events	32%	57%	9%	2%
Local buses	14%	59%	23%	4%
Social care and benefits	5%	56%	29%	10%

Table 1

Engagement with Councillors
The survey included two questions about residents' awareness and interactions with their district or county councillors.

Awareness
A significant portion of residents (75%) are aware of their councillors, with 35% having actively engaged with them in the last two years. 15% did not know who their councillors were and 10% were unsure or did not respond.

Satisfaction
Among those who had contacted their councillors, 27% were very satisfied with the response, 40% were satisfied, 22% were dissatisfied, 10% were very dissatisfied and 1% did not respond.

The satisfaction levels are relatively positive, with 67% expressing satisfaction (either very satisfied or satisfied). However, the dissatisfaction rate of 32% (dissatisfied or very dissatisfied) indicates that there is still a notable portion of the population that feels their concerns are not being adequately addressed.

Engagement with Council Officers
The survey also included questions about residents' interactions with council departments over the past two years.

Contact
65% of respondents had contacted a council department within the last two years, some respondents mentioned contacting a different borough, possibly related to friends or family across the border or where they work.

Satisfaction
Of those who had contacted a council department, 19% of respondents were very happy with their experience, 47% were happy, 21% were not happy, 12% were not at all happy and 1% did not respond.

Cotswold District Council

406 responses were from residents in Cotswold District Council. The rating of the services is detailed in Table 2 below. There were several well rated services in this district, with 90% rating Schools and education as 'good or very good', 89% rating rubbish and recycling as the same and 87% for parks, gardens, and other green spaces.

Roads, pavements and streetlights were less well rated, with 56% rating 'not good' or 'not very good at all', and 42% saying the same for social care and benefits.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	35%	54%	8%	3%
Roads, pavements and streetlights	3%	22%	44%	32%
Parks, gardens, and other green spaces	17%	70%	11%	2%
Schools and education	21%	68%	9%	2%
Libraries	18%	60%	16%	6%
Sports facilities/festivals/events	15%	58%	22%	5%
Local buses	4%	25%	41%	29%
Social care and benefits	7%	51%	32%	10%

Table 2

Engagement with Councillors

Awareness
42% of respondents knew who their councillors were and had contacted at least one of them within the last two years. 37% knew who their councillors were but had not contacted them, while 13% did not know who their councillors were.

Satisfaction
Among those who had contacted their councillors, 39% were very satisfied with the response, and 40% were satisfied. However, 15% were dissatisfied, and 6% were very dissatisfied.

Contact with Council Departments

Engagement
65% of respondents had contacted a council department within the last two years.

Satisfaction
18% of respondents were very happy with their experience, and 46% were happy. However, 26% were not happy, and 9% were not at all happy.

Forest of Dean District Council

523 responses were from residents in Forest of Dean District Council. Table 3 shows the range of ratings given to the services by the residents.

Rubbish and recycling were rated very highly, with 95% of respondents rating it as 'good or very good'. Roads, pavements, and streetlights, and local buses were seen as poor, with 67% and 64% rating them 'not good' and 'not very good at all' respectively.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	51%	44%	4%	1%
Roads, pavements and streetlights	3%	30%	43%	25%
Parks, gardens, and other green spaces	26%	60%	11%	3%
Schools and education	12%	69%	15%	4%
Libraries	16%	62%	16%	5%
Sports facilities/festivals/events	10%	56%	27%	6%
Local buses	5%	31%	40%	24%
Social care and benefits	4%	49%	35%	12%

Table 3

Engagement with Councillors

Awareness
34% of respondents knew who their councillors were and had contacted at least one of them within the last two years. 33% knew who their councillors were but had not contacted them, while 23% did not know who their councillors were.

Satisfaction
Among those who had contacted their councillors, 39% were very satisfied with the response, and 44% were satisfied. However, 10% were dissatisfied, and 7% were very dissatisfied.

Contact with Council Departments

Engagement
59% of respondents had contacted a council department within the last two years.

Satisfaction
26% of respondents were very happy with their experience, and 52% were happy. However, 13% were not happy, and 8% were not at all happy.

Gloucester City Council

401 responses were from residents in Gloucester City Council. Table 4 details the ratings given by people in this district. The data reveals that while some services, such as rubbish and recycling, are well-regarded (92% saying very good or good), but other areas are seen as sub-par, with 56%

reporting roads, pavements and streetlights as ‘not good’ or ‘not very good at all’ and 42% saying the same for social care and benefits.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	34%	58%	5%	3%
Roads, pavements and streetlights	3%	41%	41%	15%
Parks, gardens, and other green spaces	11%	68%	18%	3%
Schools and education	13%	69%	15%	3%
Libraries	18%	66%	13%	3%
Sports facilities/festivals/events	9%	57%	28%	5%
Local buses	17%	55%	23%	5%
Social care and benefits	5%	53%	35%	7%

Table 4

Engagement with Councillors

Awareness
30% of respondents knew who their councillors were and had contacted at least one of them within the last two years. 38% knew who their councillors were but had not contacted them, while 23% did not know who their councillors were.

Satisfaction
Among those who had contacted their councillors, 25% were very satisfied with the response, and 47% were satisfied. However, 17% were dissatisfied, and 12% were very dissatisfied.

Contact with Council Departments

Engagement
61% of respondents had contacted a council department within the last two years.

Satisfaction
16% of respondents were very happy with their experience, and 46% were happy. However, 18% were not happy, and 10% were not at all happy.

Stroud District Council

The district with the most responses was Stroud with 941, and the service ratings are below in Table 5. Responses were very positive overall, especially relating to rubbish and recycling which received 97% ‘good or very good’ ratings. Parks, gardens, and other green spaces, schools and education. Libraries all also had positive ratings above 85%.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	60%	37%	2%	1%
Roads, pavements and streetlights	3%	28%	48%	21%
Parks, gardens, and other green spaces	30%	63%	7%	1%
Schools and education	20%	68%	9%	3%
Libraries	26%	59%	12%	3%
Sports facilities/festivals/events	19%	67%	12%	2%
Local buses	5%	33%	40%	22%
Social care and benefits	5%	54%	33%	9%

Table 5

Engagement with Councillors

Awareness
33% of respondents knew who their councillors were and had contacted at least one of them within the last two years. 38% knew who their councillors were but had not contacted them, while 19% did not know who their councillors were.

Satisfaction
Among those who had contacted their councillors, 51% were very satisfied with the response, and 36% were satisfied. However, 8% were dissatisfied, and 5% were very dissatisfied.

Contact with Council Departments

Engagement
63% of respondents had contacted a council department within the last two years.

Satisfaction
33% of respondents were very happy with their experience, and 44% were happy. However, 16% were not happy, and 7% were not at all happy.

Tewkesbury Borough Council

403 responses were from residents in Tewkesbury Borough Council. The survey results indicate that Tewkesbury residents were most positive about rubbish and recycling services (96% very good or good), with schools and education second (84%) and most negative about roads, pavements and streetlights, with 66% rating them not good or not very good at all.

	Very Good	Good	Not good	Not very good at all
Rubbish and recycling	63%	33%	4%	0%
Roads, pavements and streetlights	4%	30%	43%	22%
Parks, gardens, and other green spaces	17%	62%	18%	3%
Schools and education	16%	68%	14%	2%
Libraries	24%	57%	15%	3%
Sports facilities/festivals/events	16%	60%	20%	4%

Local buses	18%	47%	24%	11%
Social care and benefits	7%	52%	34%	7%

Table 6

Engagement with Councillors

Awareness
30% of respondents knew who their councillors were and had contacted at least one of them within the last two years. 40% knew who their councillors were but had not contacted them, while 20% did not know who their councillors were.

Satisfaction
Among those who had contacted their councillors, 36% were very satisfied with the response, and 36% were satisfied. However, 19% were dissatisfied, and 7% were very dissatisfied.

Contact with Council Departments

Engagement
56% of respondents had contacted a council department within the last two years.

Satisfaction
25% of respondents were very happy with their experience, and 46% were happy. However, 20% were not happy, and 9% were not at all happy.

Other Services

An additional option after rating the eight specified services was 'I'd like to rate a different service'. Across all respondents, 261 respondents chose to respond to this question, just over 8% of the total respondents. This has been analysed across the county rather than by district, as the relatively low response rate to this question would imply

Issues around planning and highways dominate the comments - these two areas alone account for more than half of all service mentions. By noting that people felt the need to add extra analysis to topics such as roads and schools that had already been rated in the previous questions shows the strength of people's opinions.

For each, we have included a sentiment score[61] and some examples of the kind of comments included.

- Planning / Development / Building Control - 16.5% of comments

[61] *Each comment in the survey was tagged with a sentiment label: **Positive**, **Neutral**, or **Negative**. To quantify overall sentiment for each issue, these labels were converted into numerical scores as follows:*

- ***Positive** → **+1***
- ***Neutral** → **0***
- ***Negative** → **–1***

*For each category, the **average sentiment score** was calculated by taking the mean of all individual comment scores associated with that issue. This provides a simple, interpretable metric:*

- *A score **closer to +1** indicates generally positive feedback.*
- *A score **around 0** suggests mixed or neutral sentiment.*
- *A score **closer to –1** reflects predominantly negative feedback.*

This approach allows for easy comparison across service areas and helps highlight where public perception is most favourable or critical.

Average Sentiment Score: -0.27

There were concerns raised about new development, density, lack of local consultation and poor enforcement of planning decisions. There were also complaints raised about the performance of planning services.

- *"Planning decisions - this should be more under the umbrella of the town council not the district most of which do not live in the area".*
- *"Planning applications are dealt with extremely slowly... little consistency between councils."*
- Roads / Highways / Potholes - 10.0% of comments
  Average Sentiment Score: -0.30

There were recurrent complaints about potholes, poor road maintenance, resurfacing delays and local road safety. There were also localised complaints about the streetscape, covering issues like parking availability and enforcement, and litter and graffiti.

- *"Highways- not very good at all. Far too many road closures, and temporary traffic lights."*
- *"Fix my pothole website... a pothole in my street was fixed within the week!"*
- Housing / Homelessness / Council houses - 5.5% of comments
  Average Sentiment Score: 0.09

A number of comments were frustrated that housing services have not improved in the area.

- *"Lack of social housing for people."*
- *"Housing officers aren't good as they have too much work to do".*
- Schools / Education - 4.0% of comments
  Average Sentiment Score: 0.00

A small number of people raised issues around education, from a lack of nurseries through to problems with the education system overall. There were a number of comments about poor transport to school.

- *"Early careers - needs to be better in schools"*
- *"I think we should not have an 11 plus grammar school system. It is divisive. I went to a comprehensive school in Oxford."*
- Children's services / Child protection - 3.5% of comments
  Average Sentiment Score: -0.43

Similar to schools / education, a small number of people raised real concerns with children's services, mostly from parents trying to access SEND support for their children.

- *"Children's services - not good at all"*
- *"Parents trying to negotiate SEND provisions for children with extra needs is a lengthy and high stress process. This needs huge investment as these children will slip through the*

cracks."

- Waste / Bin collections / Recycling - 3.5% of comments
  Average Sentiment Score: -0.14

Missed collections and recycling issues appear across a number of comments. There was a surprisingly strong opposition to the way recycling centres operate with multiple people raising frustration with having to register in advance to attend and feeling that these centres make it harder for them to recycle.

- *"Any suggestion of bin collection every 3 weeks should be stopped".*
- *"Recycling Centres: Not very good at all due to having to book for a slot".*
- *"Recycling Household Centre. The registration of cars should be removed".*
- Public transport / Buses - 3.0% of comments
  Average Sentiment Score: -0.50

There were a range of complaints about bus reliability, frequency and connections — and a recognition that these impact people's ability to travel without a car. Many of these were very specific complaints about a local service.

- *"The Number 10 bus service: Inconsistent every single day, rarely happens according to the schedules at the bus stops. Many busy stops rely on printed schedules as they do not have electronic schedules. The Stagecoach West app sometimes lies about where buses are. And the overall cost is terrible. The monthly Rider Plus ticket now costs £85 per 28 days (i.e. £1,020+ per year). This is reaching a point where private transport is becoming economically comparable and vastly more comfortable and convenient over public transport. This is exactly the reverse of where public transport as a service in Gloucestershire should be heading."*
- Council tax / Benefits / Finance - 2.5% of comments
  Average Sentiment Score: -0.20
- *"Cost of council tax value for as council tax is incredibly expensive for the services received/provided."*
- *"Council tax can vary greatly in cost between councils & also which parish you live in."*

Section 3: Local government reorganisation

In this section of the survey, we focused on questions about LGR and the future of councils in Gloucestershire.

What are your top priorities when it comes to reorganising councils in Gloucestershire?

We first asked respondents to rank in order of priority the four key objectives of LGR, as set out by National Government:

'Make sure your council tax is well spent' was the top priority for most people, with 1,267 rating this highest. Next highest was 'make local services better', named as the top priority by 1,128 respondents.

There is then a large gap with only 330 naming 'provide a sense of community' as their highest priority and a similar figure of 337 saying 'provide a stronger voice for residents'.

We can see from this that overwhelmingly people's priority is the practical day-to-day spending and work of the council, rather than feeling the council should focus on issues of identity and feeling included.

Is there anything else you think should be a priority, or anything you would like us to think about when putting together plans to reorganise Gloucestershire's local government structure?

The final question in the survey asked if there was anything else respondents wanted us to consider when designing proposals for how new council services will be delivered under LGR. Almost 60% of respondents answered this question and their comments are summarised below, divided into overall comments and specific references to different structures.

Topics to consider

Almost 60% of respondents answered this question and their comments are summarised below, grouped into key categories:

Theme	Percentage (%)	Explanation
Community	16.06	Concerns about local representation, community identity, and engagement in decision-making.
Transport	9.36	Issues related to public transport, road maintenance, and connectivity.
Housing	5.47	Comments on housing affordability, development planning, and infrastructure.
Environment	3.51	Feedback on climate action, sustainability, and environmental conservation.
Economy	2.8	Suggestions for economic growth, job creation, and business support.
Healthcare	2.19	Concerns about access to medical services and hospital facilities.
Education	2.06	Issues regarding schools, learning opportunities, and educational infrastructure.
Safety	1.64	Mentions of crime prevention, policing, and community safety.

Table 7

Of the above, the most common concerns were:

a) Community engagement and local representation – Emphasis on keeping decisions local and maintaining identity.

- *"Local government is not just about providing services, it is also about being a place leader and convenor for the local system and communities. I am concerned that discussions about LGR are so reductive - just focusing on what the boundary should be. If I had a preference it would be for two authorities to retain local identity and prioritisation of areas that may be overlooked on a larger footprint with joint working to achieve economies of scale in service delivery."*

- *"Support for community hubs which provide a point of contact for services and places for people to come together."*
- *"The decision should be based on what's best for residents, NOT local politicians."*

b) Transport infrastructure – Calls for better public transport, road maintenance, and connectivity.

- *"Integrated public transport network."*
- *"Churchdown is part of Tewkesbury. I can't get to Tewkesbury on a bus from Churchdown."*
- *"Improve transport across the county as a one Gloucestershire scheme, not just good in the urban areas of Gloucester and Cheltenham."*

c) Housing development – Concerns about affordability, planning, and infrastructure support.

a) *"I recognise the need for more housing… but it's SO important that the roads and parks/green spaces around these new estates is managed well."*

b) *"Local housing only for local people and ex-military."*

c) *"Housing needs to be prioritised. Limited and get infrastructure right before new homes."*

d) Environmental protection – Requests for climate action, conservation, and sustainability.

- *"Protecting our green spaces, fields, woods, and farmland from development."*
- *"Climate and nature action for the transition to a low carbon economy."*
- *"Environmental concerns, green energy and net zero."*

Other Issues

Several other issues were raised, although in much smaller numbers. These included:

1. Youth Services
2. Public Health / GP services
3. Cycling infrastructure
4. Libraries and museums
5. Environmental services
6. Parking / Car Parking
7. Services Older People
8. PROW (Public Rights of Way)
9. Policing

Council Structure

While at no point were respondents asked to give their view on the proposed structure options of the future unitary council, 225 (7% of the respondents) actively gave preferences in the written text on which unitary council formation they would prefer out of the three currently proposed options. Of these, 205 (91%) preferred one single unitary council governing the whole county, 14 (6%) preferred the East / West split, and 3 (1%) preferred the Greater Gloucester City model. Three (1%) people said they preferred a two-council split but did not specify the split.

There were concerns that the East / West split would essentially be seen as a rich / poor divide. Few were in favour of the East / West approach, with even fewer in favour of the 'Greater Gloucester' approach. There were some disparaging remarks about the latter not "making sense" and references to this model being a "political" manoeuvre.

- *"It would be extremely unfair to split our county into two councils, especially along the lines proposed - which would effectively mean a "rich" side and a "poor" side of the county, as this would likely cause greater feelings of division between people."*

- *"The Greater Gloucestershire option is also very silly. It's just a political idea that will make us poorer."*

Some people saw the two-council option as a half-measure, continuing to cause confusion over who is responsible for what, and causing disruption to existing services while not achieving the efficiency LGR claims to provide.

- *"Providing a 'one stop' shop for council services across the County, to eliminate confusion as to who does what. Also not to break up services that operate perfectly well at the moment to further a 'two unitary' arrangement."*

- *"To have two unitary authorities would be divisive, inefficient (compared to one), and cause identity confusion (with the additional factor of South Gloucestershire already existing)."*

Many said one large council was the most efficient option, noting concerns about splitting Gloucestershire County Council regarding health, fire, police services. Economies of scale were mentioned.

There was a feeling from Forest of Dean residents that they would be neglected in a larger council.

There were those who mentioned options outside those currently proposed. Many wanted the system to stay as it is, however, many who mentioned this realised this was not an option. Some offered alternative solutions such as areas joining Wiltshire or Herefordshire or South Gloucestershire Councils.

Conclusions

Headline conclusions

Existing councils are generally well-thought of, with high ratings for both services and interactions with councillors and officers. While this reflects well on local services, it does mean that residents may be concerned about any potential change to the way their councils operate. Several comments, in person and online, reflected a contentment with the current system and a preference for no change at all.

Reviewing any negative ratings and written feedback should guide improvements in the new system, especially by addressing limitations in the current two-tier system to improve services that are less

successful now. This could include emphasising that housing and infrastructure would now be more joined-up which was requested, or it could be shown that the change gives a chance to improve the environmental credentials of the councils.

Despite many concerns about local identity and community being lost, when respondents were asked to clearly rank their priorities for the future, efficient use of council tax and good service provision were far above sense of community and a local voice.

The whole Gloucestershire model was given as the preference by the majority of those who offered an opinion on future structures.

Resistance to change

There is a need to explain to people that LGR is a national policy with wider objectives – and that no change is therefore not an option.

Our engagement activities have included informing residents about the purpose and requirements of LGR, so this process has already begun. Based on discussions and shared information, it appears that more residents now understand the national government's requirements. Although some express a preference for maintaining the current system, there is recognition that change will occur.

Many people were also aware of the wider plans for devolution, ranging from conversations about combined authority mayors to potential increased roles for parish and town councils. Future information will need to include references to what will happen here as soon as possible, to avoid the current information spreading which could be misleading.

Next steps: Clear communications

It is important to build on the engagement already carried out, to keep residents' trust and prevent any misinformation. The key learnings of the engagement show which concerns were raised and where reassurance will be needed in future communications.

People wanted to see financial efficiencies – but not a service reduction: Those who preferred a unitary system cited financial efficiencies and the main priority was effective council tax spending and day-to-day services. Presenting evidence that supports these outcomes would strengthen the case.

People are confused about which council they belong to and who is responsible for what, leading to frustration when passed between councils. Messaging should highlight that a simpler system would be easier to navigate and encourage more engagement.

Each area has a distinct identity, so it must be made clear that the change is aimed at improving administration and efficiency, rather than changing altering the local character. Neighbourhood initiatives can help maintain a sense of community and clear roles for parish and town councils.

Another primary consideration is maintaining a sense of belonging to Gloucestershire, balancing local representation with broader identity. It should be noted that local representation will remain in place, and it will become more straightforward to identify and contact representatives.

Concerns were raised that larger councils will mean decisions are made for areas by people further detached from the area in question. Measures will need to be put in place to ensure officers or councillors handle this carefully.

Residents currently happy with the council services provided will need reassurance as to how services will be managed during the period of transition – mentioning the shadow council period and being open about the fact it may take a while but will provide a better service long term.

There were concerns raised that there was no real chance to state preference for the system. Since this was a period of engagement, rather than a formal consultation, the materials clarified that an official consultation would follow. When recommendations go to the government, local messages should make it clear that people can and should provide feedback.

As detailed plans to guide the choice of options are formed by officers, these facts and figures should then be used to support communications to residents, to work together to bring forward the future of Gloucestershire.

Appendix 1: Survey questions

Section 1: A sense of belonging

What is the first part of your postcode (e.g. GL5)?

What is your local council (tick all that apply)?

- Cheltenham Borough Council
- Cotswold District Council
- Forest of Dean District Council
- Gloucestershire County Council
- Gloucester City Council
- Tewkesbury Borough Council
- Stroud District Council
- Not sure
- Other (please specify)

Where do you live?

What do you consider to be your local area?

Thinking about your answer to the last question, tell us how much you agree with the following statement: 'I feel a sense of belonging here'

- Strongly Agree
- Agree
- Disagree
- Strongly Disagree

How important are the following aspects in contributing to your sense of belonging to where you live?

Local places to go like shops, community centres, sports and fun places.

- Very important
- Important
- Slightly important
- Not at all important
- I don't have a view

Things happening nearby like festivals and events.

- Very important
- Important
- Slightly important
- Not at all important
- I don't have a view

People you know in your area like friends, family, and neighbours.

- Very important
- Important
- Slightly important
- Not at all important

I don't have a view

Green areas like parks, communal gardens, nature, and open spaces.

Very important
Important
Slightly important
Not at all important
I don't have a view

Easy to get to important things like buses, schools and the GP.

Very important
Important
Slightly important
Not at all important
I don't have a view

How safe you feel in your area.

Very important
Important
Slightly important
Not at all important
I don't have a view

History and heritage like important things from the past and local traditions

Very important
Important
Slightly important
Not at all important
I don't have a view

Section 2: Council services

For each of the following everyday council services, please rate how well you believe they are working in your area.

Rubbish and recycling collection

Very good
Good
Not good
Not very good at all

Roads, pavements and streetlights

Very good
Good
Not good
Not very good at all

Parks, gardens, and other green spaces

Very good
Good
Not good
Not very good at all

Schools and education

Very good
Good
Not good
Not very good at all

Libraries

Very good
Good
Not good
Not very good at all

Sports facilities/festivals/events

Very good
Good
Not good
Not very good at all

Local buses

Very good
Good
Not good
Not very good at all

Social care and benefits

Very good
Good
Not good
Not very good at all

I'd like to rate a different service:

Very good
Good
Not good
Not very good at all

Do you know who your DISTRICT or COUNTY councillors are, and have you contacted them within the last two years?

Yes, and I've contacted at least one of them
Yes, but I've not contacted them
I'm not sure
No, I don't know who they are

If you answered 'Yes, and I've contacted at least one of them', overall, how happy were you with how the dealt with your questions, concern or comment?

Very satisfied

Satisfied
Dissatisfied
Very dissatisfied

Have you contacted a council department (for example, parking, council tax, housing, etc) in the last two years?

Yes - several times a year
Yes - once or twice a year
No

Which council(s) did you contact?

Gloucestershire County Council
Cheltenham Borough Council
Cotswold District Council
Forest of Dean District Council
Gloucester City Council
Stroud District Council
Tewkesbury Borough Council

Think about the last time you contacted your council. Overall, how happy were you with the experience?

Very happy
Happy
Not happy
Not at all happy

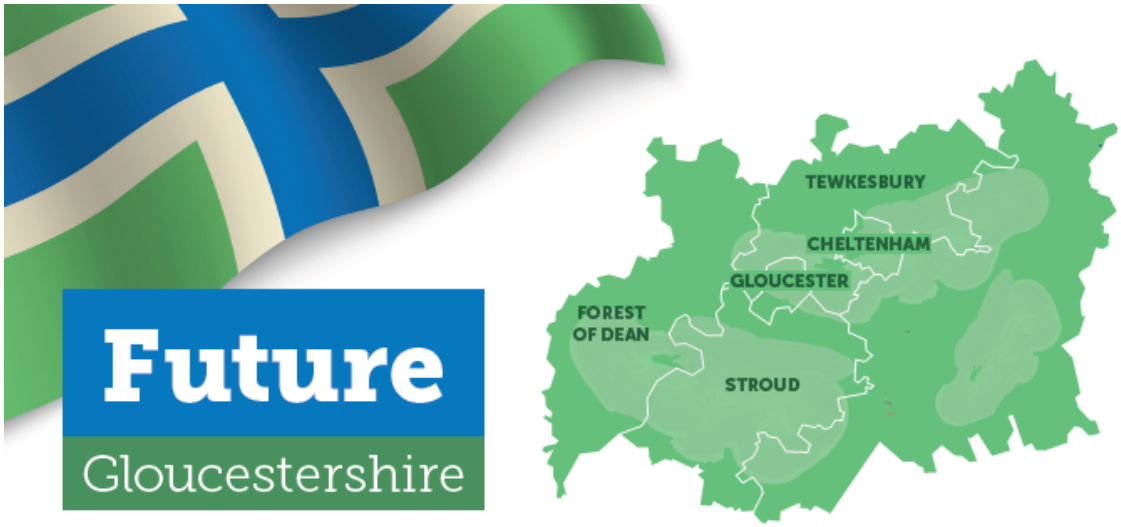
Section 3: Local government reorganisation – what matters to you?

What are your top priorities when it comes to reorganising councils in Gloucestershire? Please rate the following priorities from 1-4 (where 1 is the most important) based on how important they are to you:

Make local services better: This means improving things like rubbish collection, parks, and other services you use every day.
Make sure your council tax is well spent: Provide good local services without wasting your council tax.
Provide a stronger voice for residents – listening and responding to your concerns.
Provide a sense of community and belonging – respect the unique character of Gloucestershire, like its history and culture.

Is there anything else you think should be a priority, or anything you would like us to think about when putting together plans to reorganise Gloucestershire's local government structure?

Appendix 2: Flyers and banners



What is Local Government Reorganisation?

The national government wants to change how local councils work. You currently have one county council and six smaller district councils in Gloucestershire. The different types of councils are responsible for different services (explained overleaf).

The plan is to swap them for fewer, bigger councils that look after all services. These are known as 'unitary' authorities, and have existed across the UK in many places for several years - they can cover a whole county, part of a county or a large town or city.

The government produced an official document in 2024, showing their plans for devolution (handing power from national to local government) and saying that a unitary council system is the best way to achieve this.

What does it mean for Gloucestershire?

Rather than stating the plans for reorganisation, the government asked local councils to produce proposals on how they would like to move to a unitary model. In Gloucestershire, this could involve combining all six districts into one unitary council or dividing into two separate unitary councils.

The district councils and the county council are discussing what the best plan would be, both individually and as a group. The views of residents and communities are an important part of the decision-making process.

These changes give us a chance to check all the services we offer, to give people in Gloucestershire good, strong, and effective public services for years to come.

When will be know what is happening?

The deadline for all seven local councils to submit a joint final plan is the end of November 2025. If the seven cannot agree a shared plan, each council can submit one proposal, and the government would make the final decision.

The transfer of services would take place gradually over two years, and the unitary authority or authorities would be up and running fully by 2028.

www.futuregloucestershire.org.uk

Gloucestershire COUNTY COUNCIL

What do councils do?

County Council Services that Gloucestershire County Council is responsible for include:

- Helping children, including fostering and adoption
- Helping older people and adults who need support
- Making sure roads, paths, and cycle routes are safe and usable
- Buses, park & ride, and school travel
- Streetlights and traffic lights
- The fire and rescue service
- Making sure shops sell things fairly (Trading Standards)
- Registering important life events: births, deaths, marriages, and civil partnerships
- Working with businesses to create more jobs and help people learn new skills
- Free bus passes for older people and blue badges (parking for people with disabilities)
- Education
- Public Health - services that support people to become or remain healthy
- Libraries
- Large recycling centres and disposal of household waste collections

District Council

Cheltenham Borough Council · Cotswold District Council · Forest of Dean District Council · Gloucester City Council · Stroud District Council · Tewkesbury Borough Council

- Home rubbish and recycling collection, and street cleaning
- Collecting Council Tax
- Public spaces like footpaths, parks and trees on streets
- Planning and Building Control - Looking at plans for new buildings
- Culture, sport and leisure e.g. events and museums
- Providing homes and reducing homelessness
- Community safety teams, preventing and dealing with issues such as vandalism or noise complaints
- Community wellbeing - looking how to make people happier and healthier
- Managing benefits to help people pay their rent and council tax
- Licencing - permits for things like pubs, taxis, and events.
- Making sure places like restaurants are clean and safe
- Collecting taxes from businesses in the area (Business Rates)
- Public toilets

Town and Parish Councils

The most local voice you have is the town or parish council, although they do not have as many required roles to carry out as district, county or unitary councils. Each one could carry out different roles than their neighbour, and not all areas will have one. These will be unaffected by any plans for local government reorganisation. Responsibilities can include:

- Supporting local community groups
- Allotments
- Car parks
- Community centres
- Providing local grants
- Playgrounds
- Vandalism
- Neighbourhood plans
- Providing an official neighbourhood voice e.g. on planning applications

Future Gloucestershire

SCAN ME



Have your say!

Your district and county council want to hear from you:

How well do you feel council services in our area work?

Have you ever spoken to your local council or councillors?

What about your community is most important to you?

How can we make Gloucestershire run as smoothly as possible?

To fill out our survey, scan the QR code or visit www.futuregloucestershire.org.uk

Future Gloucestershire

SCAN ME



Local Government Reorganisation

Did you know there are national plans to re-structure the way local government works?

The system will change from a 'two-tier' to a 'unitary' authority – come and ask us what this means!

Help your local councils shape the future of Gloucestershire.

To fill out our survey, scan the QR code or visit
www.futuregloucestershire.org.uk

Gloucestershire COUNTY COUNCIL

Appendix 4: Summary Report of Feedback from Partner Organisations (Engagement conducted June - August 2025)

Background

Ministerial guidance for LGR has provided clarity about the role and purpose of Gloucestershire County Council (GCC) stakeholder engagement in the proposal development process. Criteria 4c of the Ministerial criteria makes clear that:

'Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed'

In addition, GCC has been mindful of its role in providing most of the 'crucial services' referenced in criteria 3c:

'Consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety'

Guidance has also been provided to ensure wider public sector providers are engaged as proposals are developed. The relevant guidance is contained within the Letter to Leaders from the (former) Local Government Minister.

In this context, it was necessary for a stakeholder engagement exercise to be undertaken, at pace, to ensure GCC's county-wide stakeholders were positively engaged. All engagement was conducted in the context of GCC Cabinet policy to be agnostic of structural options.

The feedback from stakeholder groups has been considered alongside the outcomes of other forms of engagement and is addressed clearly in the substantive engagement chapter of this proposal.

Objectives and methodology

Over June – August 2025, senior GCC officers held stakeholder meetings concerning LGR, focusing on services or matters of relevance to the council's work.

The objectives of the engagement process were to:

1. Ensure stakeholder views were taken into account as proposals for the single unitary and east/west two-unitaries were developed;
2. Gather intelligence about the impact of LGR on stakeholder organisations;
3. Understand what aspects of LGR were of most importance to stakeholders, as well as any concerns; and
4. Gauge appetite and interest for future involvement in LGR (and Devolution).

To achieve these objectives, the following information was provided as part of each meeting:

- An update on how LGR proposals and Devolution discussions are progressing in Gloucestershire;
- An update on the LGR policy position of GCC's new Cabinet (i.e. to be agnostic and evidence-led in considering both a one unitary and two unitary model); and
- The timetable and key processes underway.

A total of 41 meetings were held. Many of the meetings, particularly those involving Gloucestershire associations, were attended by multiple attendees. Some stakeholders chose to write to us after the meeting setting out their views. Where consent has been obtained, this correspondence is appended.

Analysis of responses – key themes

The stakeholder discussions have been synthesised and anonymised. Four key themes, together with short quotations, are set out in the table below:

Theme 1: Structural options

There was a preference amongst stakeholders for a single county unitary model. This was described by one as the *"only workable solution"*. Further comments included that two unitary authorities would *"create economic chaos and a social divide"*, whereas a single unitary would *"open up opportunities, creating aspiration"*.

Creating two unitary authorities was referred to as *"risky"*, potentially resulting in *"confusion, disruption and duplication"* and creating *"barriers and bureaucracy where it isn't needed".*

Further comments included that a two unitary model would *"exacerbate existing disparities, particularly in rural western areas such as the Forest of Dean"* and *"create greater division over time, due to the further potential different political leadership".*

Concerns were expressed that *"job losse*s", *"delay and disruption in services"* and *"loss of local identity"* would follow as a result of a two-unitary solution.

Some stakeholders supported a two-unitary model for its targeted benefits. One noted potential *"savings of £4–6 million annually"*, and argued that the West would not be disadvantaged, citing evidence of *"affluent people moving to the Forest of Dean"*.

Stakeholders that supported the two unitary model emphasised its potential to deliver more localised and responsive governance. As one stakeholder observed, *"Splitting the county would enable each authority to focus on the*

priorities unique to their communities, providing services that truly reflect local needs." Another stakeholder remarked, *"With two unitaries, there's an opportunity for healthy competition, driving innovation and ensuring better value for our residents."*

An education leader commented that a two unitary model would *"lead to a long period of protracted negotiation and uncertainty"* and *"make the delivery of public services more challenging and not achieve the same economies of scale"*.

Special school headteachers felt that a two unitary model would *"make it even more challenging to place all the children who require specialist provision in an appropriate setting – sufficiency is already one of the key barriers".*

Stakeholders from the adult social care sector raised a concern about continuity of care under a two unitary model with one stakeholder feeling that, *"waiting times for adult social care services would increase."*

Theme 2: Local identity

There was widespread support for a stronger neighbourhood approach and a place model to drive increased engagement, with repeated calls for *"co-design"* and consultation informing boundaries.

Faith and voluntary leaders highlighted that *"relationship is at the heart of what it means to be human,"* urging that *"an emphasis on neighbourhood-level engagement and the creation of place-based structures"* should underpin reform.

Theme 3: Devolution/strategic partnerships

Some stakeholders felt that West of England Combined Authority (WECA), based on patterns of economic activity and travel, was the right devolution partner. However, there was also support for considering broader Devolution models (e.g., three counties) to maximise economic opportunities and regional collaboration.

Some also saw merit in partnerships with Herefordshire / Worcestershire, especially for sectors like cyber and agri-tech. However, there was also concern that Devolution would result in "*loss of local voice"* and *"funding competition*".

Theme 4: Finances and implementation

A stakeholder stated that analysis shows *that "single unitary models incur lower transition and ongoing costs"* and *"clear benefits in annual gross savings, payback period and net savings".*

Business groups felt that *"the two unitary model would create confusion and lack identity outside of the county. They also felt that it would weaken our ability to promote the place for investment and create an artificial economic split"*.

Stakeholders mentioned the benefits of simplification, cost savings, and better use of resources under a single unitary authority.

A risk highlighted was the potential for *"paralysis in any of the seven existing authorities, during the period of change/implementation and public sector realignment"* and whether *"the anticipated savings being promoted in the LGR take into account the investment required to create the best countywide service departments"*.

There was also concern over central government interference potentially impacting coordinated implementation.

Stakeholder Meetings

Engagement took place with the following organisations and individuals:

Name	Organisation	Notes
Alistair Russell	Laing-Russell	Business Membership Group Member
Sam Holliday	Federation of Small Businesses	Representing 4,000 small business members in Gloucestershire
Helen Bojaniwska, Chair	Gloucestershire Society of Local Council Clerks (SLCC)	
Mark Gale, Chief Executive	Gloucestershire Gateway Trust	
Matt Lennard, Chief Executive	Gloucestershire VCS Alliance	On behalf of VCSE Strategic Partnership and Integrated Locality Partnership representatives in Gloucestershire. Eight organisations represented in meeting
Barbara Piranty, Chief Executive	Gloucestershire Rural Community Council (GRCC)	
Simon Pickering, Chair	Energy Business Group	14 individuals in meeting representing different

Name	Organisation	Notes
		businesses and other organisations
	Gloucestershire Association of Primary Headteachers	Numerous attendees
	Federation of Principals – Further Education and Higher Education	Numerous attendees
	Gloucestershire Association of Special School Headteachers	Numerous attendees
	Gloucestershire Association of Secondary School Leaders	Numerous attendees
Francesca Inman	Chief Executive, Cheltenham Business Improvement District	
Andy Bates, Chief Financial Officer	Gloucestershire College	
Robert Nettleton, Chief Executive & Martyn Blackman, Chief Investment Officer	Bromford Housing	
Ruth Dooley, Partner	Hazelwoods LLP	
Anonymised	CyNam	
Rupert Waters	Social Value Gloucestershire	
Simon Carey, Managing Director	Barnwood Construction	
	Northrop Gumman	Name not shared for security reasons
Rob Stemp	Deepminds Ltd	
Bishop Rachel Treweek	Bishop of Gloucester	Joined by senior clergy including Deans of the Diocese
Michael Ratcliffe	MR Insurance Services & Cheltenham Chamber of Commerce	
	Adults Collaborative Board	A group of people with lived experience of adult social care
	Gloucestershire Care Providers Association	GCPA Board Members: • Cathy Andrews • Chris Atkins

Name	Organisation	Notes
		• Claire Hopkins • Della Gilby • Josh Isaac GCPA Staff: • Pip Wilson • Riki Moody
Sarah Bell-Hartley	Barclays Bank	
David Goodall	FW Capital	
Suzanne Hall-Gibbins, Angela Edwards	C2S Ltd	Business membership organisation
Chris Farr, Regional Adviser (South West),	Country Land and Business Association (CLA)	
Michael Jones, Warden	The Honourable Company of Gloucestershire	
	Construction and Infrastructure Business Group	Numerous attendees
Chris Haine, (Chief Executive), Kerrin Wilkinson (Strategic Support Officer)	Gloucestershire Association of Parish and Town Councils (GAPTC)	
	Cyber Tech Business Group	Numerous attendees
Ruth Greenwood (OPCC Chief Officer), Chris Nelson, (PCC), Maggie Blyth, Chief Constable	Gloucestershire OPCC, Gloucestershire Constabulary	
Sarah Truelove (CEO), Dame Gill Morgan (Chair)	Gloucestershire Integrated Care Board	
Phil Smith, Chief Executive	Business West	
Matt Bishop MP, Sir Geoffrey Clifton-Brown MP, Alex McIntyre MP, Simon Opher MP, Cameron Thomas MP, Max Wilkinson MP, Roz Savage MP	Gloucestershire Members of Parliament	

Written responses

Some stakeholders, listed below, chose to provide further feedback via email or letter. Their responses, together with any other organisation or association who chose to write to GCC, are included below:

Name	Organisation
Matt Lennard, Chief Executive	On behalf of VCSE Strategic Partnership and ILP Representatives in Gloucestershire
Maggie Blyth, Chief Constable	Gloucestershire Constabulary
Stephen Limbrick, Chair on behalf of the group	Construction and Infrastructure Business Group
Fran Inman, Chief Executive	Cheltenham BID
Bishop Rachel Treweek	Diocese of Gloucester
Gill Blackwell, Chair	Hucclecote Parish Council
Gloucestershire FE Colleges (Federation of Principals)	Gloucestershire College, South Gloucestershire and Stroud College, Cirencester College, Hartpury College and University, National Star College
Hollie Wakefield	CyNam and Cyber Tech Business Group Member
Kerry Cunningham, Co-chair	Gloucestershire Association of Primary Headteachers (GAPH)
Barbara Piranty, Chief Executive	Gloucestershire Rural Community Council (GRCC)
Steve Rudd, Associate Director of Strategy and Transformation and Gloucester GP	Gloucestershire GP Collaborative (GDOC)
Sarah Truelove, Chief Executive	Gloucestershire Integrated Care Board

Response from VCSE sector

Date: 05/08/2025
From: VCSE Strategic Partnership and ILP Representatives in Gloucestershire
To: Siobhan Farmer and Alex Khaldi

Firstly, we would like to thank Gloucestershire County Council (GCC) for engaging meaningfully with the VCSE sector throughout this process. We have welcomed the opportunity to take part in open and constructive dialogue about the future of local government in our county.

As representatives of the voluntary, community and social enterprise (VCSE) sector, we recognise the scale and significance of this reorganisation. The decisions taken will shape how communities are supported and how services are delivered for many years to come. It is therefore vital that the voice of the VCSE is heard and that the implications for our sector, our communities, and the wider population are carefully considered.

One of Gloucestershire's longstanding strengths lies in its coterminous structure. This alignment has enabled strong partnership working, effective strategic planning, and efficient use of resources across the public and VCSE sectors. A move away from this model, by dividing the county into two separate unitary authorities, would risk undermining these strengths. For the VCSE sector, the consequences could include duplicated relationship management, more complex and fragmented commissioning and monitoring processes, and reduced capacity for coordinated delivery at scale. These risks carry both financial and operational costs, particularly for organisations already operating under significant pressure.

We are also particularly concerned about the impact of structural changes on smaller, place-based VCSE organisations. Many of these groups are deeply rooted in specific districts and neighbourhoods and play a critical role in supporting their communities. Splitting the county into two unitary authorities could dilute the visibility and influence of such organisations. In contrast, a single countywide unitary, if designed with strong local engagement in mind, offers a more stable platform for inclusive, locally responsive governance. It would allow for consistent commissioning approaches, clearer points of contact, and reduced administrative complexity, ensuring that smaller groups are not required to navigate multiple, potentially inconsistent systems.

We understand that the move to a unitary structure is part of a broader national policy direction, as outlined in the 2024 English Devolution White Paper and reiterated in the June 2025 *Local Government Reorganisation: Summary of Feedback on Interim Plans*. These documents emphasise the importance of clear rationale in decision-making, particularly where population thresholds are concerned. However, we do not believe the case for splitting Gloucestershire into two unitaries

has been sufficiently made. There is currently no robust evidence that such a model would improve outcomes for residents or offer any advantage to the VCSE sector.

On the contrary, analysis from PricewaterhouseCoopers suggests that single unitary models incur lower transition and ongoing costs compared to two-unitary models. Furthermore, Gloucestershire's unique geography and the clustered distribution of employment, housing, and inequalities suggest that a single structure would be better placed to support equitable development. There is a real risk that a split would exacerbate existing disparities, particularly in rural western areas such as the Forest of Dean and reduce the strategic capacity of each authority to respond to future challenges.

We appreciate the ongoing engagement from GCC officers and the commitment to working with the VCSE. Our shared ambition is for a Gloucestershire where all communities thrive, inequality is actively addressed, and services are delivered efficiently, equitably, and in partnership with the people and organisations who know their communities best.

We believe that a single unitary authority offers the clearest path toward this vision by preserving the strengths of our current system while enabling more joined-up and responsive governance.

We look forward to continuing this important conversation and to working together to co-produce a future that works for everyone in Gloucestershire.

Signed,
Matt Lennard
CEO, Gloucestershire VCSE Alliance
On behalf of the VCSE Strategic Partnership and ILP Representatives

Response from Gloucestershire Constabulary

Gloucestershire Constabulary
Police Headquarters
No.1 Waterwells, Waterwells Drive
Quedgeley, Gloucester. GL2 2AN
www.gloucestershire.police.uk

Jo Walker

Chief Executive

Gloucestershire County council

Shire Hall

Gloucester

Thursday 7th August 2025

Dear Jo,

I am writing to congratulate you on behalf of Gloucestershire Constabulary on your recent Ofsted inspection of your Children's Services. This is a tremendous achievement and a complete acknowledgement of the work that Ann and your wider leadership team have done to drive through improvements for children in Gloucestershire.

I know that my chief officer group, led by our ACC for Crime, Rich Ocone, are absolutely clear that working with and supporting you in keeping children safe is a top priority for Gloucestershire Constabulary. I am reassured that you and I have already met as Lead Safeguarding Partners to outline the key areas in which we will work together, and I am supportive of our joint plans for the new multi-agency safeguarding arrangements. Clearly, from our perspective it is vital that policing, alongside the local authority and health service fully discharge our joint statutory safeguarding duties and you have our full chief officer group support.

There are a couple of areas I thought it may be worth reinforcing as we move forward.

Multi Agency Safeguarding Arrangements (MASA) and MASH

Firstly, I am aware that Rich will continue to work with Ann in overseeing the detail of evolving multi agency safeguarding arrangements and will continue to work with Ann and partners to make sure these are successful. We are keen to help shape these, and I know Rich and Ann will update us accordingly. We can also keep close in our CEO roles so we can create the most effective and coordinated response to child protection concerns, with improved communication and information sharing and putting children's needs and interests at the heart of our joint MASA. From our

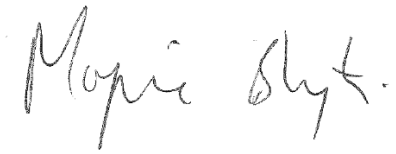
perspective our one MASH enables one front door for our respective workforce to ensure the right assessment, identification of risk and support for children requiring intervention or protection happens swiftly and robustly- we are keen to maintain one MASH to ensure consistency and coordination across the partnership, and swift assessments to respond to all children in need/requiring protection. I know that as you and colleagues work through your plans for local government and devolution you will be considering different options for the local authority. From a policing perspective, as PCC Chris Nelson and I reinforced when we met you and Cllr Lisa Spivey, we much prefer the positioning of one unitary authority so we can maintain and improve our coordination of vital capability, such as the MASH. Moreover, as we increase our analysis of our joint responses for children at risk of CSEA, criminal exploitation, going missing and the ever-increasing harm of online threat, we know that a focus on coordination, pooling of resources, identification of specialist capability and careful and swift risk assessment will be key. We are keen to ensure that we are not in a position where we dilute our current MASH capability but build on it together as a crucial front door to a range of services across the County, including police investigation and resource where required.

Secondly, we are really keen to ensure that our front-line workforce continues to receive the latest training and CPD on the threats facing children in our County. I am pleased that we have identified the joint training day on CSEA in February 2026 and we are also keen to develop our approach to responding to online harm, perhaps working with wider colleagues in CT policing and wider law enforcement. I know there are early meetings to take this forward already.

Finally, we will be disseminating our improvements since our national child protection inspection undertaken in December 2024 – we are pleased that we are making progress and would be keen to share this with you over the next month.

I look forward to working with you,

Kind regards,



Maggie Blyth, KPM MA, BA (Hons)
255558
T/Chief Constable
Gloucestershire Constabulary
Police Headquarters | No. 1 Waterwells | Quedgeley | GL2 2AN
Office – 01452 752313
www.gloucestershire.police.uk | X page | Facebook page

We are committed to being an anti-discriminatory organisation. This means not only acting in a non-discriminatory way, but addressing systemic inequalities, disadvantage and discrimination.

Response from Business Groups

For the kind attention of David Owen, Director of Economy and Environment, GCC

Ref: Responses from the Construction and Infrastructure Business Group on the Local Government Re-organisation and Devolution plans.

Date: 4th August 2025

LGR – Have you a preferred model?

- Our preference is the Single County Unitary Option.
- This should help to enable and create planned and managed strategic, sustainable growth and social regeneration throughout the county.
- It should ensure a whole county approach which does not disadvantage businesses in rural areas or urban hubs that continue to need long term investment and regeneration solutions
- This option meets the Government's size criteria

Devolution – Have you a preferred geography?

- Our preference is for Gloucestershire to be a standalone, single authority.
- If we are required to combine with another authority as part of Devolution, then we consider that South Gloucestershire has more established and relevant links with important business sectors in Gloucestershire including: - Defence, Cyber, Advanced Manufacturing, Creative, Education and Sustainable Energy.

What are the big economic opportunities from change?

- Planned strategic and sustainable growth.
- An opportunity to create centralised exemplar departments for key services e.g. A Planning / Sustainable Environmental Growth Team. This should be a new team with strong leadership and resources combining: - Planning, Highways (building on their delivery capacity), Planning Legals, mains Services, Water, flooding etc., working around solutions to, and promotion of, a Countywide Strategic Plan for economic regeneration and development (already in its infancy). This could be an exemplar department providing a proactive, quality and effective service across the whole of the county in a balanced, joined up and integrated manner.
- A Utilities Czar could be a new role focusing on coordination and cooperation between all parties over challenging needs and requirements of development and infrastructure, helping to minimise log jams and delays across the county. This would also help to avoid strategic, countywide, economic planning needs being affected by individual district priorities and boundaries e.g. J10 and Cyber Park.It is accepted that to create such a department and

service will require new investment in new professional skills and resources, however, the benefits are anticipated to be considerable in assisting sustainable growth and regeneration for Gloucestershire.

- It is hoped that the anticipated savings being promoted in the LGR take into account the investment required to create the best countywide service departments as the one broadly outlined above.

What are the economic threats from change?

- It is anticipated that there will be job losses (especially at senior level) to achieve LGR.
- In the short term there is likely to be delay and disruption seen in services, however, it is anticipated that these issues will be outweighed by the long-term benefits.
- Lack of investment in the right personnel and resources in the detailed planning, establishment and management of new operational service structures will impact on the effective change and value of LGR. This is essential for their success.
- Risk of reduction in Government funding to the county following savings promoted in LGR.

Response from Cheltenham Business Improvement District

From: Fran Inman
Date: Thursday, 7 August 2025 at 11:16
To: OWEN, David
Subject: Local Government Reorganisation and Devolution

Good morning David,

Please see below how devolution and local government reorganisation could provide both pros and cons for Cheltenham Business Improvement District:

Key Threats to the BID from Devolution

- Loss of local voice: A larger devolved authority may centralise decisions, weakening Cheltenham's influence.
- Funding competition: Risk of resources being directed to bigger centres.
- Reduced business engagement: Complexity and distance from decision-making may disengage levy payers.
- Policy misalignment: Devolved priorities may not reflect Cheltenham's business needs or placemaking ambitions.

Opportunities for Cheltenham

- Access to greater funding: For transport, regeneration, and skills development.
- Stronger strategic voice: If BIDs are embedded in governance structures as a key stakeholder, we can influence regional economic strategy.
- Joined-up planning: Opportunity to align infrastructure, town centre growth, and skills strategies.

2. Cheltenham as a hub: A chance to position Cheltenham as a key economic and cultural centre within a devolved geography.

Cheltenham BID does not take a position on the political decision of whether devolution or LGR should happen. However, if change does occur, we believe the voice of Cheltenham's businesses must be represented, local decision-making should be protected, and opportunities for investment in our town centre should be maximised.

Always happy to discuss further.

Best wishes,
Fran

Francesca Inman

Chief Executive

Response from Diocese of Gloucester

The Rt Revd Rachel Treweek
Lord Bishop of
Gloucester & Anglican
Bishop for HM Prisons
The Bishop's
Office 2 College Green,
Gloucester, GL1 2LR
bgloucester@glosdioc.org.uk
Tel: 01452 835511

+RG/AODP
29 July 2025

Siobhan Farmer
Director of Public Health
Gloucestershire County Council
Shire Hall
Westgate
Street
Gloucester
GL1 2TG

Dear Siobhan

Reflections following our recent meeting on Local Government Reform

Thank you again for meeting with the Bishop's Staff Team on 17 July 2025 to explore the implications of the proposed Local Government Reform for Gloucestershire. We appreciated the opportunity to contribute to your thinking at this formative stage and to reflect together on both the risks and opportunities for our communities.
As you noted, the shift to a unitary authority model raises complex questions of identity, representation, and place.

Our discussion focused heavily on the importance of identity. Gloucestershire as a whole lacks a single, cohesive identity. Many communities are orientated more towards external centres - Bristol, Birmingham, London, and even Wales—than towards a unifying county centre. This is reflected in regional media coverage, patterns of travel, and informal networks. Interestingly, many communities feel as if they are 'on the edge' (e.g. bordering Oxford, Wales etc).

As a diocese (covering an area from just south of Stratford upon Avon to just north of Bristol-the old ceremonial county) we have two Archdeaconries (Gloucester and Cheltenham), each with a number of what we call deaneries (clusters of parishes). The Gloucester deaneries are Gloucester City, Stroud, Forest, Wotton and Severn Vale; and the Cheltenham deaneries are Cheltenham, North Cotswolds, Tewkesbury and Winchcombe, and Cirencester.

About 10 years ago we did an analysis of the social context, and Benjamin Preece Smith (Diocesan Secretary) would be very willing to share that with you. One of the things we observed is three key areas in the county: Forest, Vale and Hill. Neither Cheltenham or Gloucester are big enough as single entities and are quite insular settlements. In Gloucestershire, a number of settlements are quite old, and several of the market towns act as hubs for the villages and surrounding areas e.g. Northleach/Moreton-in-Marsh,

Stow and Chipping Campden.

Each of the 42 dioceses in the church of England are grouped into regions. This diocese is formally in the SW region but we have removed ourselves to the West Midlands region as we have far more in common with Worcestershire and Herefordshire (not least regarding events such as the Three Counties Show and the Three Choirs Festival). We are curious about how connections with these counties are being considered in proposals.

Gloucestershire is actually relatively small compared to many large cities and counties, and we are concerned that the discussion is around dividing what is already small into something even smaller. What does this mean in terms of critical mass for the University, our schools etc? Dividing the county into east and west could weaken rather than strengthen local governance and complicate partnerships—particularly in areas such as education and health, where scale and consistency matter.

When we appoint new clergy to the diocese we always talk about the diocese as being large enough to be well-resourced and small enough that we know each other. In all of your discussions, we would want to keep an emphasis on relationship, which is something that is not emphasised enough in political thinking, new housing, governance and policies etc. As Christians, we believe that relationship is at the heart of what it means to be human and to be made in the image of God, and we believe that people of different faiths and of no faith would recognise the fact that, in the UK, we have diminished the importance of relationship across so much of our society. We would want you to be asking questions about relationship and community. Thus, we strongly support your emphasis on neighbourhood-level engagement and the creation of place-based structures that reflect where people actually live and relate. This is what we endeavour to live as a diocese, encouraging local community engagement.

We were encouraged to hear that any neighbourhood model will be co-designed and that consultation will inform how boundaries are drawn. We would welcome the opportunity to support that work and would be glad to contribute parish and deanery mapping to help build a fuller picture of local networks.

In all of this, there are also questions about social identity. There is undoubtedly much greater diversity in Gloucestershire than some people wish to acknowledge, not least regarding social background and racial diversity. In areas which are often characterised as middle-class and affluent, there are many pockets of hardship, and much greater inequality than many people want to recognise. I also believe we have to be asking the hard questions about why young people choose not to come back to Gloucestershire once they have left home.

Finally, it was good to acknowledge that, in all these discussions, we are certainly not saying that the structures we currently have work really well. Some district councils are performing better than others, and we note that authority and influence are pretty poor in other areas. For example, we would certainly want to acknowledge that the city centre in Gloucester has changed hugely, and no one seems to have a grip on owning it or bringing about change.

Having said that, we did also comment on the fact that Gloucestershire punches above its weight when it comes to charities, voluntary organisations and the third sector. How will proposed changes affect the activity of civil society?

Finally, we were glad to note the commitment to continued engagement and consultation.

Thank you again for your time and partnership. Please do keep us informed as the process develops - we would be very glad to remain part of the conversation.

Yours sincerely.



Copy to:

Benjamin Preece-Smith (Diocesan Secretary)

Lucy Taylor (Head of Diocesan Comms & Engagement & Deputy Diocesan Secretary)

gloucester.anglican.org

01452 835511 bgloucester@glosdioc.org.uk

@BishGloucester /Diocese.of.Gloucester Diocese of Gloucester

Bishop's Office | 2 College Green | Gloucester | GL1 2LR

Registered in England: 162165. Registered Office: Gloucester Diocesan Board of Finance, Church House, College Green, Gloucester, GL1 2LY. Registered Charity Number: 251234.

Response from Gloucestershire Further Education Colleges

Campus,
Llanthony
Rd
Gloucester
GL2 5JQ
0345 155 2020

29th July 2025

To whom it may concern

Response from the Gloucestershire Further Education Colleges to Unitary Authority Proposals for Gloucestershire

We welcome the opportunity to contribute to the ongoing discussion around local government reform in Gloucestershire. Further education (FE) colleges play a central role in delivering technical and professional education, improving social mobility, and addressing the region's skills needs. Whilst we will ultimately work proactively with whichever model is adopted, we strongly favour the creation of a single all-county unitary authority. This model offers the most coherent, equitable and strategic approach to supporting learners, employers, and the county's economic development.

We believe that option has the following advantages:

- Strategic Alignment Across the County - A single authority enables a joined-up approach to economic development, transport, housing, and education -all of which are essential to integrated skills planning.
- Simplified Relationships - Colleges currently operate county-wide, working with multiple stakeholders and systems. A single point of engagement would reduce duplication, streamline planning, and improve accountability.
- Efficient Commissioning and Funding - Fragmentation risks are likely to increase commissioning costs, with more overhead and bureaucracy -meaning less funding reaches the learner. A single authority offers economies of scale and consistent commissioning decisions.
- Equitable and Impact-Led Resource Allocation - A county-wide authority is better positioned to allocate capital and revenue funding where it delivers the greatest impact for learners and employers, not simply within rigid administrative boundaries.

- Unified Voice in Devolution and Investment - A single authority would be a stronger and more coherent partner in any future devolution deals or combined authority arrangements. This is essential to secure fair access to devolved budgets and influence key strategic decisions.

Whether through an East/West division or a "Greater Gloucester" configuration, we have significant concerns about the impact of splitting Gloucestershire into two unitary authorities. Some of us already have experience or working across multiple local government areas and the attendant administrative and strategic consequences which include:

- Multiple EHCP and Transition Pathways - Working with multiple local authorities risks increasing inconsistent approaches to EHCPs, transition planning, SEND funding, and placement decisions - adding complexity and creating inequity for vulnerable learners.
- Diverging Priorities and Governance - having to align to multiple sets of political priorities, governance structures, and reporting processes. This reduces clarity for the communities we serve and adds pressure to strategic and operational planning.
- Fragmented Transport, Careers and Support Services - Inconsistent approaches to transport policy, travel subsidies, and wraparound support (e.g. mental health, careers advice) can undermine participation and progression -especially for rural and disadvantaged learners.
- Risk of Geographic Ring-Fencing of Funding - If future funding (including capital) becomes restricted to specific local authority areas, this creates distortions in investment decisions and reduces the ability to deliver provision where it is most needed - especially where college catchments span boundaries.
- Devolution Misalignment - There is a risk that different parts of Gloucestershire could become aligned to different combined authorities or mayoral areas. This would fragment influence, reduce coherence, and complicate FE's ability to engage with regional priorities.

In conclusion, based on our experience and the operational realities of FE delivery, we believe that the single all-county unitary model represents the best option; and have reservations about any structure that splits the county and introduces duplication, inconsistency, or competition for resources.

We look forward to engaging further as proposals develop.
Signed on behalf of:

Gloucestershire **College, South Gloucestershire and Stroud College, Cirencester College, Hartpury College and University, National Star**

Response from Hucclecote Parish Council

HUCCLECOTE PARISH COUNCIL

Ms Jo Walker
Chief Executive
Gloucestershire County
Council Shire Hall
Westgate Street
Gloucester
GLI 2TJ

13th August 2025

Dear Ms Walker

Hucclecote Parish Council discussed the recent Local Government Re-organisation (LGR) engagement exercise that is being undertaken at its 28 July meeting, and we could not understand why the survey did not clearly ask which of the three current LGR options we preferred.

As we could not state our preference, we felt we had to set out why we strongly support the single countywide unitary option.

- It is likely to result in the most cost effective and efficient delivery of services.
- It will also provide the opportunity for early Community Governance Reviews would enable the uniting of fractured communities to be considered: -
    - The majority of the existing Hucclecote Parish within Tewkesbury and the remainder ofHucclecote currently within the City of Gloucester.
    - The creation of a single parish to cover Coopers Edge, which currently straddles the border between Tewkesbury Borough and Stroud and is split between three parish councils.

It should also be noted that the single unitary option is also supported by the County Councillor for the Brockworth Division, as well as the Borough Councillors for the Churchdown Brookfield and Hucclecote Ward.

We believe the suggested two unitary split of East and West Gloucestershire would permanently re-enforce the current difficult local boundaries for local communities.

We therefore seek your assurance that you will actively advocate for a single unitary council for the county.

Yours sincerely



Gill Blackwell
Chair of Hucclecote Parish Council

CC:
Cllr Lisa Spivey, County Council Leader
Alistair Cunningham. CEO Tewkesbury Borough Council Cllr Richard Stanley, Tewkesbury Borough Leader
Jon McGinty, MD of Gloucester City Council
Jeremy Hilton, Gloucester City Leader
Alex McIntryre, MP Gloucester Cameron Thomas, MP Tewkesbury Max Wilkinson, MP Cheltenham
Matt Bishop, MP Forest of Dean Dr Simon Opher, MP Stroud
Sir Geoffrey Clifton-Brown, MP North Cotswold

Response from Cyber Tech Group

From:
Sent: 07 August 2025 12:37

To: CAMPBELL, Karen
Cc: WOODHOUSE, Paul
Subject: Re: Local Government Reorganisation and Devolution

Hello Karen,

Thank you for the note. Please find my feedback below.

Whilst I do not have a deep understanding of the implications of selecting a single unitary authority, or two unitary authorities, or the Greater Gloucester model, my preferred model would be a single unitary authority. There are ovbious benefits like cost savings and efficiencies, alongside the ability to develop a strong narrative and plan for the whole of Gloucestershire which competes on a national and international level. I am not sure how much I buy into a couple of arguments specifically put forward about the east/west model. Specifically:

1. Whether the average person understands the role of their local councillor (especially the younger population), how often they utilise their local councillor and their MP, and whether a person identifies with their ward, their town/city, or their county. It would be interested to know what the turnout of the population voting in the local elections versus the general election in the 6 authorities, as this would likely show how much of the population would be affected by less localisation.
2. Forest of Dean being put into the clean energy cluster - they have huge advanced manufacturing capability and so would surely align more with the defence and advanced manufacturing organisations in Tewkesbury for example
3. Cotswolds in the secure tech cluster - not sure what capability exists in this authority for this rationale

Regarding devolution, preference seems to be WECA as government has made it clear funding will be funnelled through mayoral authorities, yet there is a slight concern that Gloucestershire's tech cluster will be overshadowed by Bristol and Bath, and the funding they have already received. If mayoral elections could be held for the Herefordshire/Worcestershire option, I would welcome more information on Worcestershire and Herefordshire's key sectors to think about alignment. There is a defence alignment that I am aware of already, for example.

The main economic opportunity I see is funding, and how the accessibility of this funding will be impacted by the option we choose.

The main threat I see is the disparity in the services and the costs associated with them provided by each Council, and how future service provision and associated costs will be calculated, as this is what will impact the average person the most. E.g.

Cheltenham and Gloucestershire's licensing fees are more expensive than the other 4 authorities, and Stroud has the highest council tax rate in the county. I also mentioned above about competing for funding with other established strategic authorities and the places within them.

Thank you,

Member of Cyber Tech Group – Name withheld for security reasons

Response from Gloucestershire Association of Primary Headteachers (GAPH)

Director for
Education
Gloucestershire
County Council
Shire Hall,

Westgate
St
Gloucester
GL1 2TG

Sent by email to Kirsten Harrison cc: Ann James

16.07.25

Dear Kirsten

Thank you so much for the meeting on Thursday 10.07.25 and for introducing us to the potential change for Gloucestershire.

As Co-Chair of Gloucestershire Association of Primary Headteachers (GAPH), on behalf of the Executive, I am writing to you in your capacity as Director of Education, to set out our views on this proposal.

We would have waited until the GAPH Executive Meeting in September, which you will attend, however, as you explained in your presentation, you have a meeting on 17th July 2025, with the Chief Executives group and we therefore wanted to make our position clear on this very important issue for Gloucestershire as a whole and in particular the Education sector, for which the District Councils have no jurisdiction, nor responsibility.

The Government Criteria for Change:

- *Establish a single tier for the whole of the county area*
- *The right size to achieve efficiencies, improve capacity and withstand shocks (aim for 500k population or more)*
- *High quality public services with specific mention of 'crucial' services (children's, SEND, homelessness)*
- *How devolution will be unlocked*
- *Enabling stronger community engagement and neighbourhood empowerment*

As conveyed by the unanimous views of the members of GAPH Executive, with representation from each Partnership, we hold the view that one, single tier, Unitary

Authority is the only workable solution for Gloucestershire, with reasons including the following:

- Children's Services and the Education sector's current working model (countywide) for statutory duties (for example: Admissions, EHCPs and timely access to support for children with SEND, Hospital Education, Social Care) would need to be split in an East/West model, creating potential difference and division over time, due to the further potential different political leadership.
- How would the Designated Schools Grant this be apportioned fairly and equitably, with schools located as they are geographically in an East/West model?
- The potential costs of splitting the single authority responsibilities of Children's Services- Education into two authorities will lead to a long period of protracted negotiation and uncertainty. You cited Northamptonshire as an example of disaggregation, which, having created two Authorities in 2018, only in August 2024 finally came to agreement over the financial settlement.
- The standard for a Unitary Authority is 500,000. The current county size is 650,000. Creating East and West would make those two Authorities smaller than the proposed standard size, which would making the delivery of public services more challenging and not achieve the same economies of scale that a single Unitary Authority would make, creating higher overall vulnerability to 'shocks'.
- How would the current countywide High Needs debt be apportioned fairly, in a two-tier system?
- Forming two Authorities from one, would create an additional border for the county and result in working an 'out of county' services model, for services which sit within the same postcode.
- The geography of schools means that schools working in Partnerships, Federations and/or in Gloucestershire MATS could find themselves working with two different Authorities, making effective and efficient running of these settings more challenging.

In your meeting with the Chief Executive Group, we are seeking written reassurance that you and Ann James, as our representatives, advocate strongly the view of GAPH and our position that a single county Unitary Authority is the only workable solution to this Government Strategy.

Yours sincerely,



Kerry Cunningham
Co-Chair of GAPH and Executive Headteacher of The Longlevens Primary Federation

Response from GRCC

GRCC Community Action in Gloucestershire

Formal Feedback from GRCC
Local Government Reorganisation County Options

There is an overwhelming need for the whole process of Local Government Reorganisation to be properly managed due to the risk of becoming a major distraction, take longer to implement, and cost significantly more to achieve meaningful rationalisation.

GRCC has a role in supporting Parish and Town Councils, whose concern is that this first tier of government will get either bypassed or forgotten or, worse still, be required to take on, possibly by default, delivery of local services without the wherewithal, especially financial, to ensure continued, viable service delivery.

The concept of Local Neighbourhoods, with populations of between 20- 50,000 is an interesting one, possibly comparable with the old Rural District Councils. However, there are currently major questions which remain unanswered:

- How would the Local Neighbourhoods be configured?
- Where would the local alignments be set?
- What responsibilities and powers would they have?
- What relationships would they have with the upper tier?

Within these higher population configurations, smaller communities, particularly those situated on the periphery of the county, perceive a risk of being subsumed into larger clusters with which they perhaps share neither natural connections nor established relationships. More concerning still is the fear of being entirely overlooked. Such communities frequently express apprehension that their perspectives will be marginalised, leaving them with limited or no opportunity to have their voices acknowledged or meaningfully heard

GRCC is in a position to support local communities in the transition to new models of local government and enable them to step in to help provide local services. Most of these services are currently delivered by District Councils which may otherwise struggle, for example: management of allotments, playing fields and open spaces; maintenance of highway verges; management of public toilets etc.

It is noticeable that there is no GCC cabinet member with a specific remit / portfolio for rural. Gloucestershire is the 33rd most rural authority in terms of its geographic area.

It is in the top 20% of authorities in terms of rurality, and 87.5% of its area is classified as rural, therefore a specific rural focus would be beneficial. We would of course be happy to support this work as rural specialists.

A question that needs to be answered also is whether Devolution would come with a recalculation of funding for Gloucestershire.

Options Appraisal

Single Unitary Authority

A single unitary authority meets government criteria in terms of size, will be more cost effective, and will eliminate the confusion of the current fragmented county and district council system.

It also preserves 'Brand Gloucestershire' – a clear identity which is stronger with all constituent towns and parishes taken together, speaking with one voice on a regional and national level. 'Brand Gloucestershire' is more marketable as a single countywide authority. It would provide a strong, cohesive entity which would play its full part in the operation of any upper tier Strategic Authority, irrespective of whether Gloucestershire is combined with WECA or with Herefordshire / Worcestershire.

The single unitary option will also provide an opportunity to create strong community hubs to address local matters, supporting small communities.

The single unitary option makes eminent sense and is the only option which would achieve the Government's stated objectives, with the following benefits:

- With a population of circa 652,000 it would meet the Government's aspiration for Councils to have a population of over 500,000. One unitary authority would be a considerable size, but would mirror the county's current footprint.
- The current three tier authority model is outdated and creates dissention between the differing tiers, especially over planning, waste management, etc., as well as causing confusion for communities as to 'who does what'. The single unitary is simpler, saving the most amount of money, and communities already know this governance model.
- It has the potential to achieve significant operational and financial savings by:
    - removing duplication of service delivery, e.g., planning, waste collection / disposal, etc.;
    - rationalising property, particularly office accommodation;
    - securing economy of scale benefits generally
- It has the potential to:

  - strengthen the County's voice at national and regional levels;
  - achieve effective strategic alliances with Health, Police, Highways;
  - provide more attractive career pathways for staff to progress, which will in turn help recruitment and retention;
  - enable proper countywide strategic thinking and planning to take place, especially in terms of:
    - land use disposition;
    - new housing allocations;
    - proper forward planning;
    - development of creative economic models to enhance growth and employment;
    - flood management
- It removes confusion in the minds of the general public and could provide opportunities to establish genuine 'One Stop Shop' Local Service Delivery points around the county
- From the perspective of the rural communities we serve and smaller VCS organisations and groups we support, there is a real fear around loss of voice and loss of funding to support the most vulnerable

East and West Option

The only real benefit is the improvement on the current seven district and county council arrangement for most of the reasons set out above, albeit to a lesser extent due to there still being two councils operating within the geographic county area instead of one. It would also allow communities to keep a local identity, and not feel as if they are being swallowed up by the county.

If this option were to be pursued there would be an overwhelming case for not aligning it around the current District Council configuration because this would perpetuate, indeed exacerbate current boundary anomalies and tensions. Much of this is currently being played out in the case being made by Gloucester City Council to create a Greater Gloucester to overcome largely historical inconsistencies created in 1974 when Tewkesbury Borough Council in particular was established.

The major disadvantage of the two-council split model is that it could lead to the disaggregation of services currently delivered on a countywide basis by Gloucestershire County Council, such as Social Care, Education, Fire and Rescue, Highways Management, Libraries, County Farms, etc., into two separate organisations. It raises concerns around consistency and quality of care provision, such as mental health and social care services, where Gloucestershire County Council

has taken on responsibility for more of these services from Gloucestershire Health and Care Trust.

More boundaries add complexity for support and service delivery, contracting may be become a logistical nightmare, and ultimately it could result in fragmented and inequitable service provision across the county. This split of services into two organisations could be avoided by joint board or lead authority models being put into place, but this would largely defeat the object of adopting this option in the first place. This model would also exacerbate cross-border issues, especially in health provision, cause confusion for communities, and cause a wealth divide.

Overall, adoption of this model would be a major missed opportunity to create an organisation with identity and presence, and many of the benefits of a single council option would be significantly diluted or dissipated.

General Issues

Affordable Housing delivery

Local Government Reorganisation offers both potential benefits and drawbacks in terms of affordable housing delivery. While the pros include greater clarity for residents, potentially more efficient and cost-effective service delivery due to larger scale, and easier strategic decision making, these must be balanced against a list of cons that might involve a key potential loss of local responsiveness, difficulties in achieving projected savings, and challenges in boundary alignment with functional economic areas.

Rural areas already face significant challenges in delivering affordable housing due to a combination of factors including: high house and land prices; area designation; relatively low wages and limited development opportunities. These issues are exacerbated by factors like second homes, short-term lets and restrictive planning policies.

Differing policies within the districts in terms of planning and allocation policies are also an issue. When we add that loss of “localness and clarity” that is essential in the delivery of truly affordable homes to those challenges, the difficulties faced by those in dire housing need in rural Gloucestershire become insurmountable. We have started to witness areas within rural Gloucestershire that are becoming gated, dying communities with unbalanced demographics, where socioeconomic development is stagnant. The reduction in the number of Local Registered Providers is becoming a real issue as more and more merge, with a significant and detrimental effect on the delivery of small numbers of homes in rural villages. However, Rural Affordable Housing is finally being recognised as a significant and important topic for everyone.

It is about much more than just building a house; it is actually the foundation of everything else in our society.

Affordable housing must become a KPI of every major sector, be they Public or Private, and this is especially true in rural areas such as Gloucestershire. Affordable Rural Housing delivery is crucial for a thriving economy and society, impacting heavily upon various industries and communities as well as public sector bodies such as health and education. This means that policies and initiatives, including Local Government Reorganisation, must consider the housing needs of rural regions. In the refresh of the Leadership Gloucestershire group, GRCC feels decision makers should seriously consider a place for planning. Having this level of expertise available to the group would enable efficient countywide strategic planning to take place in terms of housing, land use, and the economy.

As LGR emerges in Gloucestershire it is vital that there is a uniform and consistent approach from all sectors at all times. The more boundaries and borders there are, the more difficulties and costs faced by sectors such as Health, Education and the Police, and the delivery of Rural Affordable Housing becomes even more challenging. This at a time when all sectors need to be able to work coherently and seamlessly together in order to deliver sustainable, quality services that can also work together, forming strong partnerships.

One Health Authority, one Education Authority, one Police and Emergency Authority, one Planning Authority, and one Rural Affordable Housing organisation could mean faster, more efficient partnership-based delivery of affordable housing. Lack of affordable housing affects all areas including economic growth, social equity, health and wellbeing, education, hospitality and retail.

In conclusion, as a neutral, independent Voluntary Sector organisation and rural specialist whose role is to represent and serve the communities of Gloucestershire, we hope to have provided a balanced and constructive view/opinion of both options based on over a century of understanding and knowledge of the county, along with our multi-level connections and reach into those communities.

August 2025

Response from GDOC (Gloucestershire's GP provider organisation)

Hi Alex,

We tested this with our GP Collaborative Summit today, comprising all of our Gloucestershire GP practices and Primary Care Networks. There was a clear majority decision from our practices, which has informed the response that I'm pleased to provide below:

Gloucestershire General Practice Collaborative, on behalf of our general practice providers across Gloucestershire, welcome the opportunity to comment on proposals for future local government structures in our county. Our primary objective in providing this feedback is ensuring that the health and care system best supports the delivery of high-quality, sustainable and integrated care for our population and the patients we serve on a daily basis.

We believe that a **single unitary authority for Gloucestershire** would bring clear benefits compared to establishing two smaller unitary authorities:

1. **Clearer Alignment with NHS Structures**
   - Gloucestershire is a clearly defined 'place' within the new Gloucestershire and BNSSG Integrated Care Board (ICB). Furthermore, our primary care structures are also aligned to our Gloucestershire footprint, such as our GP Collaborative, our Local Medical Committee (LMC) and our Local Pharmaceutical Committee (LPC). A single unitary authority would align with this geography, avoiding the duplication and fragmentation of relationships that two authorities would inevitably create.
   - This alignment would streamline joint planning for population health, prevention, and service delivery.

2. **Simplified Partnership Working**
   - General practice is engaging in system-level programmes, through our GP Collaborative, our Primary Care Networks, our Integrated Locality Partnerships and our ICB. Having one local government partner makes collaboration more straightforward, saving time and resources.
   - A two-unitary model would double the number of political, officer, and governance forums practices would need to engage with, stretching already limited leadership capacity in primary care.

3. **Consistency for Patients, Communities and Neighbourhoods**
   - A single authority provides residents with a more consistent offer for public health, social care and other services that directly affect health and wellbeing.
   - In contrast, a two-unitary model risks divergence of policy and provision, leading to inequities between communities and confusion for patients, potential boundaries in our recognised primary care networks and neighbourhoods and inequalities being exacerbated by two-unitary authorities with potentially quite divergent economic positions.

4. **Efficiency and Value for Money**
   - From a health system perspective, the fewer the boundaries, the less duplication in commissioning, contracting, and monitoring arrangements. This efficiency ultimately releases more resource for front-line services.
   - At a time when both the NHS and local government face severe financial pressures, avoiding duplication is essential.

5. **Stronger Strategic Voice**
   - A single Gloucestershire authority would be a more robust and influential partner when working with NHS England, regional bodies, and government departments on health and care issues.
   - It would reduce the risk of competing priorities or fragmented lobbying across different councils.

Conclusion

Gloucestershire General Practice Collaborative strongly favours a single unitary authority for the county. This model is most compatible with the way health services are organised now and also with the future plans for organisation, best supports effective partnership working, and minimises duplication. Most importantly, it provides the clearest and fairest route to improving outcomes for patients, communities and neighbourhoods across Gloucestershire.

With best wishes,

Steve

Steve Rudd MBA | Associate Director of Strategy and Transformation and Gloucestershire GP Collaborative Management Lead | G DOC LTD | Quayside House, Quay Street, Gloucester, GL1 2TZ | Mobile: 07795 685090 | Email: stephen.rudd@nhs.net



G DOC LTD

Registered Office: Quayside House, Quay Street, Gloucester GL1 2TZ

Registered in England and Wales, CRN 08230041

Response from Gloucestershire Integrated Care Board (ICB)

NHS Gloucestershire
Shire Hall
Westgate Street
Gloucester
GL1 2TG

PA. tara.carr@nhs.net

2nd October 2025

Jo Walker
Chief Executive
Gloucestershire County Council
Shire Hall
Westgate Street
Gloucester
GL1 2TG

(sent via email)

Dear Jo

Local Government Reorganisation

Following the ICB Board seminar agenda item on Local Government Reorganisation and Devolution that Sarah Scott led I am writing to give the feedback on behalf of the ICB to the three options presented. The strong preference from the ICB is for the Single County Unitary option. The key points that we felt supported this view were as follows:

- Having developed social services at a whole Gloucestershire level we think it would be a backward step to move to two social work teams for the county. This would increase complexity for those working in our NHS services, to have two sets of processes and teams to engage with to ensure the flow of people through our care.
- There is also significant risk that we have a higher concentration of people with complex needs living in the West of the County because as commissioners of services that have been driving to achieve best value for the whole county we have physically placed certain care settings where property prices are lower (in the West of the County). This is a risk that in an East/West split of unitary authorities that there will be an imbalance of responsibility for high need groups that will cause unforeseen consequences and exacerbate inequalities.
- The PWC financial option analysis shows a clear advantage to having a single unitary authority from a financial perspective and in a period when all public services are under considerable pressure to deliver best value to our population we feel this is an important consideration.
- We recognise that we need to work closely with you to ensure we continue to shift our care models to meet the changing needs of our population. This is best done in neighbourhoods and we feel the option described as Greater Gloucester may disturb some of those natural communities and the good strong working that we have developed in our localities.

Becky Parish has shared evidence with Siobhan and Sarah from previous public engagement exercises which shows little difference in what is important to people from their public services.

I hope this response is helpful as part of the business case development and I am happy to discuss this further at our next 1:1 if that would be helpful.

Yours sincerely

Sarah Truelove

Sarah Truelove
Chief Executive Officer
NHS Gloucestershire

cc: Shane Devlin
Jane Cummings

Appendix 5: Detailed Options Analysis

This appendix provides additional detailed commentary assessing a **Single Unitary Authority (1UA)** and **Two Unitary Authorities (2UA - East and West)**, against the nine criteria agreed for this business case.

Detailed analysis of **single unitary (1UA) model** against criteria

Criteria	Sub-Criteria	Alignment Summary	RAG
1. Sensible single tier of local government	A) Establishes a single tier of local government for the whole of the area concerned.	Under a 1UA model, the current councils would be replaced by a single authority (albeit legally GCC would be a 'continuing authority'). This would remove structural duplication and create one point of democratic and operational accountability for all services across Gloucestershire. • **Removes two-tier complexity** – Seven existing councils (one county, six districts) would be replaced by one organisation delivering all functions • **Simplifies resident experience** – Residents would contact one council for all local services, reducing confusion and referral between tiers. • **Consolidates statutory roles** – All key statutory officers would sit within a single executive team, streamlining leadership and governance. • **Enables consistent locality governance** – The Place Model for Gloucestershire proposes establishing Neighbourhood Partnerships in every part of the county. A single council can embed this consistently across all areas, regardless of historic district structure. • **Supports whole-system working** – Joined-up delivery becomes easier when strategic and local functions sit within one structure.	G

		• **Meets MHCLG expectations** – The model delivers a complete single-tier structure for the area, as defined by government policy.	
	B) Sensible economic breakdown: with a tax base which does not create undue inequalities.	The 1UA model allows financial variation across Gloucestershire to be managed within a single council. This enables redistribution between areas, protects against localised risk, and supports a unified approach to tax and budget strategy. • **Enables pooled resources** - Council tax, business rates, and government funding can be allocated based on need across the whole county. • **Supports financial equity** – A single UA can help drive more equitable growth across the county as a whole balancing any disparities that might exist in productivity and growth across individual areas at the moment (e.g. Business Growth in the East is 1.10% v/s -1.15% in the West). • **Simplifies council tax alignment** - Aligning current tax levels has reduced political and legal complexity under one council. • **Increases fiscal stability**– A larger tax base and merged reserves lower the risk of localised budget pressures and increases the ability to effectively manage Local Authority Debt (£819 for countywide v/s £674 in the East and £948 in the West). • **Allows single financial strategy** – One Medium-term Financial Strategy (MTFS) and capital programme can be used to balance investment and risk county-wide, including place-based regeneration and neighbourhood infrastructure.	G
	C) Sensible geographic breakdown: which will help increase	The 1UA model keeps Gloucestershire's existing administrative and strategic footprint intact. This aligns with current health, community safety, transport, and economic delivery boundaries, reducing disruption and supporting long-term coordination.	G

	housing supply and meet local needs.	• **Alignment with existing partner geographies** – The ICB, Police, Fire and NHS all operate on a countywide footprint, reducing need for renegotiation or duplication e.g. in terms of engagement activities. • **Maximise the council's influence with the ICB -** Given the proposed changes with ICBs looking to take on more local authority areas, retaining a single UA across the county will enable Gloucestershire to retain a strong voice. • **Avoids the creation of administrative internal borders** – A 1UA structure removes the risk of current countywide services or geographies being split (e.g. children's admissions, SEND pathways, acute hospital discharge pathways etc). • **Supports more strategic spatial planning** – The model enables Local Plans, Local Nature Recovery Strategies, and the Gloucestershire Infrastructure Strategy to be aligned across the county. This would ensure strategic projects such as The Forum project in Gloucester City and the Berkeley Site low carbon energy park in the West are planned in a coordinated way, alongside shared housing and infrastructure corridors that link Gloucester, Cheltenham, and Tewkesbury • **Simplifies strategic countywide structures that already exist** – There are already numerous examples of successful countywide partnerships across all seven councils including Climate Leadership Gloucestershire; Local Visitor Economy Partnership (LVEP); Gloucestershire Strategic Housing Partnership etc. These partnerships enable strategic countywide coordination and leadership for things like housing priorities, rough sleeping, cross cutting climate issues etc. A 1UA model makes this even simpler to drive with a single council. • **Strategic management of homelessness and housing land supply**- A single council could be better positioned to take a more joined up approach to homelessness and housing supply countywide, which could reduce variation in housing capacity and support in meeting the increasing demand and complexity particularly in temporary accommodation across the county. This would allow strategic allocation of sites, directing development to areas with greater capacity while managing demand hotspots. Consistent policy could be applied to meet the countywide shortfall against the	

		five-year supply target (East has 4.97 years and West has 3.83 years, with a countywide shortfall of 4.37 years).	
2. Right-sized local government	A) A population of 500,000 or more (unless specific scenarios make this unreasonable)	The 1UA option: • **Meets statutory benchmark** – The combined population of ~659,000 is above the MHCLG target of 500,000 or more. • **Supports strategic scale** – This population size enables the council to manage key statutory functions (e.g. ASC, education, planning) with scale and consistency. • **Aligns with successful precedent** – The population aligns closely with other approved unitaries (e.g. North Yorkshire, Cornwall, Buckinghamshire).	G
	B) Supports efficiencies and value for money for council taxpayers	By consolidating governance, systems, and staffing, the 1UA model offers significant opportunities to reduce duplication and generate savings over time. • **Delivery of potential net revenue savings from reorganisation of ~£21.1m per annum.** • **Reduces duplication** – Only one set of ICT systems, governance structures, and senior statutory roles e.g. one Director of Adults Social Care Services (DASS), one Director of Public Health (DPH) etc. • **Streamlines service delivery** – A single operating model for each service (e.g. One revs and bens team and set of policies and not seven) avoids overlapping teams and inconsistent standards or support offers for residents across the county. • **Contracting economies of scale** – Significant benefits from aggregation of contracts (particularly noting bringing together Line of Business system contracts for service areas etc). In addition to this,	G

		increased economies of scale and procurement leverage of procuring a single contract (as opposed to six smaller ones) for specialist services e.g. cyber, contaminated land, asbestos etc.	
	C) Improves capacity and supports the council to withstand financial shocks	The 1UA model offers stronger resilience, especially in high-cost and high-risk areas like ASC and CSC. In addition to this, through aggregation of some fairly small and stretched teams, there is increased resilience in areas where there are already significant workforce recruitment and retention challenges and scarce professional expertise and capacity. • **Enablers better management of significant imbalances in demand across the County –** In particular, within ASC, there is significantly higher demand and cost for working age adults (specifically for supported living) between the East and West of the county. A single UA can deploy resources (incl. finances and staffing) more flexibly to service this imbalance in demand. • **Increased workforce resilience for highly qualified and specialist service professionals –** Skills sets which are already highly scarce (with national shortages) e.g. environmental health officers within public health, planners, social workers benefit from being in single organisation to enable pooling of expertise, support succession planning and reducing the risk of exacerbating workforce challenges through duplicating or splitting staff across multiple organisations (or creating competition between authorities for the same staff). • **Frontline workforce flexibility –** A single UA can flexibly deploy front line staff incl. casual staff across the county to support delivery e.g. library staff currently working across multiple libraries or even the registrars team maintaining a single pool of c.80 casual celebrants who are deployed flexibly to deliver weddings and ceremonies across the county. • **Supports statutory resilience** – A single set of statutory roles reduces recruitment pressure and minimises significant additional ongoing costs of senior roles. • **Protects Place Model delivery** – Central support functions (finance, HR, data) are key to enabling locality-level delivery across Gloucestershire.	G

		• **Strong support resilience for front-line services –** Core services such as fire and rescue rely on local authority support services and financial support e.g. HR, legal, finance etc to support delivery. A single larger UA is likely to offer strong financial resilience and create less administrative burden of apportioning out support costs etc. • **Decreased senior management capacity –** Due to the aggregation of senior management roles, the 1UA model could potentially have a reduced capacity at senior levels to sustain financial shocks	
	D) Manageable transition costs	A single authority model allows for less structural duplication and avoids the cost and complexity of standing up two separate organisations, through reduced disaggregation • **Requires creation of only one new authority and legal structure, minimising transition costs** - estimated to be ~£21.3m. *Assumption based on assuming a continuing authority being in place.* • **Simplifies legal setup** – Only one constitution, shadow authority, electoral review, consultation and governance framework would need to be designed, approved and run. • **Reduces portfolio and programme duplication** – A single implementation portfolio required to manage the transition and implementation. • **Lower ICT migration and integration costs –** Currently shared countywide systems such as Liquid Logic (for ASC) would not need to be disaggregated or duplicated. In addition to this, data and systems migration could be managed on a service by service once (as opposed to multiple sets of systems migrations activities for each service). Lastly, one single website can be developed for the new council. • **Minimises duplication of senior roles** – One executive team avoids the need to recruit and fund parallel statutory leadership posts which can be significantly costly. • **Reduces duplication of county input –** Current county council stakeholders can be a part of a single implementation portfolio and would not need to spend additional time in multiple meetings, governance forums, working groups (i.e. county council stakeholders would need to be involved in all conversations if there were multiple UAs being created given disaggregation implications).	G

		• **Reduced risk of disruption to traded services –** Reduced risk of disrupting effective traded services that operate on a countywide footprint particularly in relation to services provided to schools.	
3. High quality, sustainable services	*A) Improves local government and service delivery, avoiding unnecessary service fragmentation*	The 1UA model would preserve current integrated delivery structures in areas like social care, education, and public health. A single unitary within Gloucestershire, if designed with strong local engagement in mind, offers a more stable platform for inclusive, locally responsive governance. Colleagues currently operate countywide, working with multiple stakeholders and systems. A single point of engagement would reduce duplication and improve accountability. • **Preserves current service integration** – Existing countywide delivery in areas such as transport, ASC, CSC, SEND, and safeguarding would remain intact, avoiding risk to safeguarding, statutory thresholds, and pathway coordination. • **Supports end-to-end planning** – Joined-up pathways for prevention, care, education, and housing can be planned across one structure (particularly important for high-risk residents who cross multiple services). • **Enables minimum disruption to significant transformation and improvement journeys that are ongoing** – e.g. there are significant multi-year transformation programmes planned in ASC which could continue with minimum disruption under a 1UA scenario. • **Minimal disruption to multi-agency partnership arrangement** – Only one set of safeguarding boards, ICB pathways, youth justice panels, and place-based health partnerships are required, making service collaboration easier and more effective. • **Resilience through scale and leadership continuity -** Professional Service Leads consistently highlight that larger authorities reduce risk during transition by retaining experienced senior leadership teams and service delivery infrastructure. • **Challenges of delivering services across diverse geographies -** The 1UA model would require the integration of two urban centres (Cheltenham and Gloucester) and expansion of capabilities to	G

		meet the rural needs across the county. This could complicate existing operating models and ways of working and risking inconsistencies in access and quality that could endure into the future. • **Increased aggregation risk** – A 1UA model would require aggregation of six district-specific services into one collective service which is likely to be significantly complex e.g. aligning six different council tax support schemes etc.	
	B) Opportunity for public service reform including where this will lead to improved value for money	The 1UA model enables a unified transformation strategy and consistent investment in digital tools, analytics, automation, workforce planning, and shared infrastructure, all of which are already underway through the transformation initiatives and emerging Place Model design. • **Creates a single platform for change** – Transformation programmes in ICT, workforce, data, and estates can be delivered countywide. • **Enables shared innovation** – AI, automation, and digital case management tools can be designed once and used everywhere. • **Supports cultural alignment** – One council avoids divergence in practice or priorities, allowing consistent reform over time. • **Improves analytical capacity** – Shared data infrastructure can support predictive and population-level service planning, particularly linking to public sector partners like Police and NHS – this is key to continuing to drive a focus moving away from eligibility to focus on prevention and early intervention (i.e. not waiting for the crisis to happen first). • **Backed by service insight** – Service leads across ICT, libraries, revenues and benefits, asset management, housing and homelessness etc consistently stated that a 1UA model would remove duplication in systems and governance, strengthen programme alignment, and enable investment to scale across the county. • **Improved strategic influence and collaboration with partners –** A single larger UA is likely to have more influence and scale to negotiate with local and national partners incl. educational	G

		institutions, DWP, ICB etc to drive stronger system-wide leadership and delivery of improved shared outcomes locally. • **Increased scale and financial resilience to innovate –** A single larger UA is likely to have access to large amounts of resources (workforce, finances, connections with others) to innovate, fail fast and learn. This is critical to driving improvement and reform. • **Better value for money** – In services such as ASC, CSC, public health and commissioning, the scale of a 1UA model could provide better value for money through economies of scale and single strong voice in the market. • **Creation of a single trusted front door for residents and partners** – A 1UA model can retain a simple, universal, trusted front door for residents to simplify their experience but also drive efficiencies in contact and delivery.	
	C) Improves delivery of, or mitigates risk of negative impact on, crucial services	A single authority can manage variation in service demand and outcomes across the geography by redistributing resources and targeting investment based on need. This supports equity in access and outcomes, especially for crucial services such as social care, children's services, SEND and homelessness, and for wider public protection services including for public safety. • **Enables flexible resource allocation** – Investment can be targeted where demand is highest (e.g. higher ASC and CSC spend in the West) can be managed effectively. • **Improves consistency** – A single authority can maintain common standards and expectations for service access across the county, with flexibility built in at the point of delivery. • **Supports data-led prioritisation** – Systemwide data enables identification of emerging needs across urban and rural areas and supports early intervention strategies that can be locally delivered. • **No need for disaggregation of critical countywide services delivered to the most vulnerable in society** - Service leads across CSC, education, public health, and commissioning warned that two unitary authority models would pose risks of disaggregating safeguarding, school admissions, EHCP timeliness, statutory performance oversight etc.	G

		• **Reduces postcode variation** – Residents in different areas would experience equal levels of service and support which drives fair and equal access for all. • **Protects Multi Agency Safeguarding Arrangements (MASA) and MASH –** Minimum disruption to the single front door to make sure the right assessment, identification of risk and support can be provided to children at most risk who need to be protected. In line with engagement with stakeholders from the Police, *"a 1UA provides the best opportunity to continue to maintain and improve coordination of this vital MASH capability with a focus on driving consistency, pooling of resources and alignment"* between the Police and local authority workforce. • **No borders created between the county** – A countywide model makes it easier to coordinate placements for education or social care to be considered across a bigger geography without the need to negotiate potential 'out of county' placements if administrative boundaries were to be created. • **Addresses homelessness strategically** – A single housing and commissioning function can plan across high-demand urban areas (e.g. Gloucester and Cheltenham) and rural areas, ensuring consistent prevention and support offers.	
4. Meets local needs	*A) Meets local needs and is informed by local views*	While formal public consultation has not yet taken place, this options analysis has been informed by engagement undertaken with the public through surveys and in-person events, officers from service areas and partners across the county (including county council, district councils and other partners including Police, VCSFE, health etc). Many countywide partners, including further education, health, VCFSE, Constabulary and the Diocese, voiced strong support for a single voice and shared strategic frameworks to maintain coherence across Gloucestershire. The EqIA analysis that has been conducted also indicates that a single council could strengthen consistency in engagement with groups with protected characteristics (e.g. disabled residents, ethnic minority communities) by creating one countywide approach to inclusive communications and accessible consultation materials, reducing risk of variation in how voices are heard across areas.	**A**

		• **Reflects strategic partner input** - The 1UA structure aligns with preferences expressed by the NHS, Police, and some economic partners for a single interface, highlighting that a single accountable authority would reduce duplication and improve clarity for service users. • **Backed by some VCFSE organisations** – Some VCFSE representatives who have been engaged emphasised that a single UA would make partnership working and funding engagement "simpler and more consistent," reducing the duplication they currently face when working across multiple districts. • **Supported by some of the county's local business networks** – Feedback from business representatives, including the Federation of Small Businesses, highlighted the benefit of "one clear voice" for economic development, inward investment, and regulatory services, making Gloucestershire easier to promote to investors and government. • **Based on current delivery structures** - The model builds on the existing approach to ASC, CSC, public health, transport - all delivered at county scale. • **Enables future local engagement** - Under a 1UA model, the council would have capacity to design and invest in community-level consultation structures. • **Capacity to combine strategic oversight with local delivery-** Services such as HTST, EHCP delivery, and ASC benefit from being managed by a single larger UA which has the scale to sufficiently manage and resource but with the ability to flexibly deploy resources locally. • **Places local voice at the centre** - The Place Model workstream (co-led by GCC and partners including OPCC, VCS Alliance, and ICB) has designed mechanisms for neighbourhood engagement within a single authority. • **Service-led locality feedback** – Discussions across ASC, CSC, libraries, ICT and education consistently supported a single authority with locally delivered services. Officers favoured retaining local footprints for operational delivery, noting this was already how people experience services. • **Risk of reduced local visibility if locality model is not prioritised** – Several stakeholders, including parish councils and VCSFE representatives, expressed concern that without sustained investment in neighbourhood governance, a single UA could appear more distant from communities,

		particularly in rural areas such as the North Cotswolds and the Forest of Dean, where access to decision-makers is already seen as limited.	
	B) Improves / mitigates risk to issues of local identity, cultural and historic importance	The 1UA Model has been designed to protect and celebrate the many places of Gloucestershire. 267 parish councils currently cover the majority of the county and our Neighbourhood Partnership proposals seek to decentralise services and give greater voice to communities of place, interest and identity. • **Local identities –** There could be concerns that a single UA could dilute the distinct cultural, social and economic identities of Gloucestershire's two key urban centres (Gloucester and Cheltenham) which therefore may not gain local support. However, this can be mitigated as noted below. • **Civic identity retained** – Town and parish councils, mayoralties, and ceremonial roles would remain in place. For Gloucester a parish (city council) would be created, and similarly for Cheltenham, a parish (town council) would be created. These new parishes would serve to strengthen the identity and significant cultural and historic value of each city/town within Gloucestershire • **Allows for place-based branding** – Services can retain local naming, visual identity, and signage to reinforce place association, a priority raised in the Diocese and VCFSE stakeholder engagement responses. • **Reflects community affinity** – Feedback from planning, libraries and safeguarding services emphasised that residents associate more strongly with place-based identities than with institutional structures, making it essential to maintain visible local identity alongside a single governance tier. • **Neighbourhood Partnership proposals will make the new council closer to the places people know.** – The model will create a coherent offer for populations of 30k-50k, bringing the council and decision making closer to residents • **Supports visibility of place** – The new authority can retain ward and locality names to reflect place-based identity across the county.	**A**

		• **Builds on community infrastructure** – Areas like the Forest, Stroud, and the Cotswolds already have strong place-based partnerships in place. The 1UA model enables these current strengths to be built on with a more powerful place-based emphasis and approach. • **Builds on current area-based practice** – e.g. ASC and CSC already hold case review forums and safeguarding panels at area level, often aligned to the current districts. This culture of place-based accountability would continue to be retained and formalised under the single authority. • **Successful precedents exist** – Unitaries such as Buckinghamshire and North Yorkshire have adopted area boards and neighbourhood forums to maintain local visibility, improve outcomes and encourage community participation.	
	C) Addresses local concerns	The 1UA model enables county-wide service planning while allowing targeted investment in places with higher levels of need. This supports consistency of offer while maintaining flexibility to respond to local variation. • **Could be perceived as overcentralisation –** A single larger UA could be perceived by some stakeholders and residents as moving services further away from people and creating less understanding and tailoring of services to meet local needs. However, this can be mitigated with robust locality governance and retaining operational delivery close to people (as is the case already e.g. with locality based social work teams etc). • **Supports differentiated planning** – Strategic services (e.g. ASC, education) can be commissioned based on local demand and vulnerability indicators. • **Addresses inequality** – The model enables planning across areas with different outcomes (e.g. West: 16,609 children in low-income families per 100k vs East: 12,274). The 1UA model maintains the ability to respond strategically while allowing delivery to reflect place. • **Place-sensitive commissioning already in use** – Commissioners in ASC and education noted that funding allocations already account for variation in deprivation, demand and access (e.g. funding per	**A**

		capita is higher in the West for ASC and in the East for transport access). A 1UA model protects this flexibility while enabling oversight of equity countywide • **Supports coherent infrastructure and regeneration investment** – Officers stressed the value of having one capital planning and housing function able to target investment into high-need areas (e.g. brownfield regeneration in the West; affordability and access issues in the East), rather than splitting strategic capacity across two smaller councils. EQIA findings highlight current East–West disparities in transport access for disabled and older residents, and a 1UA model enables these to be addressed in a single transport accessibility strategy linked to Local Transport Plans.	
5. Supports devolution arrangements	*A) Helps to support devolution arrangements / unlock devolution*	The 1UA model simplifies engagement with Whitehall and regional partners. • **Streamlined governance** – A single authority avoids internal fragmentation, simplifies representation, and strengthens Gloucestershire's strategic negotiating position. A single council gives partners a single door in for strategic collaboration and funding opportunities. • **Improves visibility and scale** - A bigger footprint and unified leadership increase Gloucestershire's credibility and profile in national negotiations. • **Compatible with existing regional structures** – Gloucestershire currently aligns with the South West for funding and some aligned service delivery (e.g. South West Ambulance Service) and also shares ties with the West Midlands (e.g. through economic corridors and shared events). A single council can better preserve overlapping relationships and flex across both without splintering Gloucestershire's strategic position or regional partnerships. • **Improved clarity in negotiations** – Members and senior officers highlighted that a single unitary would allow Gloucestershire to present itself with clarity in devolution negotiations, and avoid unnecessary complexity in areas like housing, infrastructure and skills.	G

		• **Attractive investment platform** – A single council is better positioned to attract investment in growth sectors like advanced manufacturing, cyber, and clean energy, which operate across county boundaries. These areas require joined-up strategic leadership and investment. • **Improving transport connectivity -** There are already plans in place across the county to improve transport connectivity. Devolution offers opportunities to build on this and connect Gloucestershire with other economic corridors enabling further regional collaboration and enabling residents to access further opportunities.	

	B) Sensible population size ratios between local authorities and any strategic authority	Under a 1UA model, Gloucestershire would join any future Combined Authority or Strategic Authority as a single partner, with a population of ~659,000. This contributes meaningfully toward the 1.5 million minimum benchmark used in current legislation and policy design for deeper devolution.
		
		• **Compatible with multiple strategic groupings to meet minimum population thresholds by and large –** With one voice, Gloucestershire can engage in potential Combined Authorities including:
		  ○ Gloucestershire + West of England Combined Authority (WECA) Core: 1.6m
		  ○ Gloucestershire + WECA (incl. North Somerset): 1.81m
		  ○ Gloucestershire, Herefordshire and Worcestershire: 1.45m (falls a little short of the 1.5m threshold).
		  ○ Gloucestershire, Oxfordshire + Swindon: 1.63m
		• However, concerns were noted around the relative size of a single Gloucestershire Unitary Authority in comparison with other partners in a Combined Authority. For example, in the case of a WECA option, Gloucestershire would be the largest partner in WECA, with a population of c. 659,276, compared to Bristol's c.472,400, South Gloucestershire's c.290,400 and Bath and North East Somerset's c.193,400 (population figures based on ONS 2021 census). This could potentially make a single unitary less appealing for other partners.
			G

6. Local engagement and empowerment	*A) Enables stronger community engagement*	The 1UA model removes local district councils but can introduce new forms of local representation and democratic engagement. Its success in this area would depend on strong designs and investment in locality arrangements. Some partners expressed concern that community engagement in a 1UA model must be deliberately designed, with one noting: 'if you don't build in real localism, people will feel even further away". • **Could be perceived to be further away from communities –** A larger authority may be perceived by some stakeholders to be moving further away from communities with a much larger and more diverse geography to consider. • **Requires active design** – The model does not automatically strengthen participation; new structures would need to be developed (a process already initiated through the Neighbourhood Area Partnerships proposed by the Place Model programme). • **Supports consistent frameworks** – A single council can create countywide standards for local structures including Neighbourhood Area Partnerships. • **Avoids duplication of democratic processes** – One tier of governance reduces overlap and potential confusion over responsibilities (a key concern in feedback from the VCFSE sector and the Diocese). • **Can be designed to enable inclusive local representation** – Governance can be shaped to reflect towns, parishes, and historic communities across Gloucestershire. • **Rooted in ongoing local work** – The Neighbourhood Partnership model, co-designed by GCC, OPCC, the ICB, and the VCS Alliance, is already testing place-based forums that bring residents, councillors and service teams together to shape local priorities. • **Allows for a strengthening of capacity to support engagement** - The 1UA delivers the highest overall savings of options being considered (c.£21.1m annual net savings). In turn, this may allow for its Neighbourhood Partnership proposals to be given greater financial support and expert officer capacity.	G

	B) Delivers genuine opportunities for neighbourhood empowerment	The 1UA model allows the council to embed neighbourhood governance into its core structure, particularly through the development of Neighbourhood Partnerships and Locality Hubs. It can formalise new models of area-based working and build on existing parish and community networks. There are also projected to be greater financial benefits from a 1UA model (noted above), which can support investment in place-based working and visible local governance across the county. • **Facilitates locality working** – Existing family hubs, community wellbeing teams, and parish clusters can be aligned to formal locality areas, ensuring operational delivery remains close to communities. • **Enables shared design** – Area committees (formal sub-committees of a local authority that operate at a more local, geographical level) or Neighbourhood Partnership can be co-designed with communities and elected members. The Place Model being worked on already in Gloucestershire explicitly sets out a roadmap for co-production. • **Formalises locality governance** – Proposals are being co-designed with partners including OPCC, ICB and VCS Alliance, with clear plans for shared decision-making at place level. • **Supports consistent service access** – Local service offers can be standardised, targeted and resourced across the county. • **Backed by services and partners** – Service professionals including CSC, planning, and ASC leads stressed the importance of retaining area-based decision-making capacity, noting that local visibility matters for legitimacy. • **Raises the visibility and role of local councils and VCFSE organisations**: The creation of a Civil Society Covenant and a Local Councils charter elevate the role of vital local and hyperlocal organisations • **Protects equity of access** – A single council can strive to ensure that every locality, rural or urban, has the same opportunity to develop Neighbourhood Partnerships and access resources. However, this may sometimes be harder to achieve on such a big footprint.	G

		• **Reduces risk of divergence** – Feedback from ICT, audit and planning services highlighted that neighbourhood working is best enabled by shared systems, standardised training, and joint commissioning, which is possible under a 1UA model. • **Builds on existing models** – Several services (e.g. ASC, children's services, housing) already operate with area-based or district-level coordination. For example, in CSC, local safeguarding hubs and area panels are already delivering place-based oversight. • **Risk of democratic deficit** – By removing layers of government people feel as though the unitary is far removed from their local issues which can decrease engagement.	
7. Environmental and climate protection	A) Ensures the new authority/authorities have clear capabilities to deliver existing and future climate and nature plans.	The 1UA model offers scale and continuity in environmental governance. It enables strategic investment, consistent targets, and stronger institutional leadership on net zero, nature recovery, and flood resilience while safeguarding key partnerships and plans. • **Preserves existing plans and partnerships** – Gloucestershire's Climate Strategy, Local Nature Recovery Strategy, Climate Leadership Gloucestershire and Strategic Flood Risk Management approach are all designed countywide and can continue seamlessly under 1UA. • **Enables scale of investment** – Environmental budgets, procurement, and staffing can be centrally coordinated, with local delivery shaped through Neighbourhood Partnerships. • **Avoids duplication of leadership** – A single structure prevents gaps or overlaps in environmental governance. • **Aligns with existing officer capacity** – Current small specialist teams in areas such as flood risk and climate strategy can be consolidated. • **Enables neighbourhood engagement** – Through the Place Model, the new authority can embed environmental priorities into Neighbourhood Partnership plans, empowering communities to lead on climate actions suited to local needs.	G

		• **Bolster the role of the Lead Local Flood Authority (LLFA) -** Pooled resources between County and Districts, and the ability to direct those resources according to need across the whole county would maximise the resources we do have (i.e. whether based on the location of consenting and enforcement cases, schemes, planning consultations or individual flooding events). In addition to this, a single authority would have single ownership of Strategic Flood Risk Assessments (Levels 1and2) and could also drive a more coordinated approach to identification and delivery of flood alleviation schemes and associated bids to national funding	
	B) Reflects local priorities in areas with sensitive landscapes (e.g. Forest of Dean, Cotswolds AONB).	The 1UA model supports joined-up spatial planning and stewardship across protected landscapes. It maintains geographic continuity and ensures consistent protections across jurisdictional boundaries. • **Avoids splitting landscape governance** – Natural assets such as the River Severn catchment, Cotswolds escarpment, and Forest woodlands would remain under one set of policy and delivery arrangements. • **Supports integrated land-use planning** – The Local Plan and planning policy can incorporate rural, urban, and protected areas under one authority. Officers confirmed that issues like nutrient neutrality need consistent policy and joint delivery at county level. • **Retains current plans for Local Nature Recovery Strategy (LNRS)** – Developed at a county level over the past three years and to be delivered by upper tier / unitary authorities. • **Retains current infrastructure for biodiversity net gain (BNG)** – Gloucestershire Nature and Climate Fund (GNCF) is a not-for-profit body supported by all seven LAs to trade BNG development units within Gloucestershire • **Preserves cross-boundary programmes** – Flood schemes, biodiversity corridors, and green infrastructure plans are easier to deliver through one capital plan and Local Plan framework. • **Allows local tailoring within one system** – Local protections (e.g. Cotswold design codes, Forest regeneration priorities) can be embedded in area-specific planning and delivery through the Place Model.	G

		• **Supports rural stewardship through locality governance** – Parish partnerships and community networks, particularly in the Forest and Cotswolds, can be empowered through Neighbourhood Partnerships to influence local environmental strategy.	
	c) Builds on existing commitments (e.g. "Fairer Greener Forest", Climate Emergency responses).	The 1UA model provides the governance platform to protect, expand and align Gloucestershire's district-led climate initiatives. It strengthens monitoring and accountability while enabling communities to drive action locally. • **Does not erase local ambitions** – Protects locally developed climate action - Programmes such as "Fairer Greener Forest," Stroud CAN, and Cheltenham's net zero route map which can continue with local leadership but benefit from countywide funding, systems, and legal support. • **Allows integration of district priorities** – The new authority can build a single climate plan that draws on existing strategies. reducing duplication and aligning priorities without weakening local ownership. • **Supports accountability** – A single scrutiny framework allows monitoring of commitments made at both county and locality level. • **Enables targeted support –** Rural off-gas areas, high-deprivation urban communities, and at-risk flood zones can be prioritised in capital investment using a shared dataset and single capital plan. • **Backed by partners** – Stakeholders, including public health, VCFSE and environmental partners, emphasised that 1UA would simplify joint action on climate and support more joined-up community participation.	G

8. Civic engagement and participative democracy	*A) Promotes civic engagement and strengthens participative democracy.*	The 1UA model creates the scale and reach to invest in countywide civic engagement, while retaining flexibility for local communities to shape how they participate. It provides the infrastructure to support both digital and in-person engagement through the Place Model. • **Supports digital and in-person tools** – Investment in consultation platforms, community budgets, and resident panels can be made at county scale, supported by the central functions of the new council • **Embedded in service design** – Housing, planning, transport, ASC and CSC services are already designing resident input into locality plans and Local Development Frameworks. A 1UA allows this to continue without duplication. • **Protects equal access to voice** – A single model of civic engagement ensures that all areas, including rural parishes and urban neighbourhoods, can participate on equal terms. • **Supports community leadership** – Officers emphasised that strong place-based leadership is already being built through co-design pilots in the Forest and Cheltenham, and that a single authority enables these structures to scale. • **Anchored in Gloucestershire's tradition of community partnership** – The VCFSE sector and local clergy highlighted the need to maintain grassroots decision-making. The 1UA model can help to make sure the local voice can be protected and funded within a single, countywide democratic framework. • **Risk of democratic deficit -** Given LGR will reduce the number of elected councillors and create larger electoral divisions, this will increase the number of residents each councillor represents. This could risk a democratic deficit.	**A**

9. Inclusive growth and equity	*A) Ability to tackle disparities in wealth setting up one unitary authority or two unitary authorities.*	The 1UA model allows the council to address local disparities across the county through joined-up economic, transport, and skills planning with the ability to redistribute funding and focus support on areas of need. A single structure would be well-placed to support equitable development and reduce strategic risk. • **Enables countywide planning** – Economic development, employment, and regeneration can be designed to benefit the full geography, not just high-growth areas. • **Targets investment to areas of need** – Indicators show clear differences between areas (e.g. GDHI: £26,149 in East vs £21,191 in West, and job density is 1.01 and 0.82 respectively) that can be addressed through unified policy and without governance friction. The West also has higher deprivation scores (IMD 17.16 vs 12.71 in the East) and carries 60% of the county's children in low-income households - factors that a single authority can address through pooled resources, targeted regeneration, and shared preventative service funding. • **Reduces risk of postcode inequality** – A single structure avoids divergence in access to services or funding between two separate councils. • **Improves delivery of levelling up goals** – National funding (e.g. LUF, SPF, Homes England) can be more effectively coordinated through a single accountable body, improving Gloucestershire's attractiveness as an investment partner. • **Supports area-based targeting** – Through Neighbourhood Partnerships, the council can ensure each area has a local regeneration plan focused on its specific barriers to growth and access.	G

	B) Prioritises vulnerable residents and community-level regeneration.	The 1UA model allows for pooled budgets and shared commissioning strategies that prioritise support for those most in need. Vulnerability and deprivation can be addressed without artificial boundaries between areas. • **Supports consistent targeting** – Shared datasets and analytics platforms allow services to target support to where indicators show the greatest unmet need (e.g. West Glos: 16,609 children in low-income families per 100k vs 12,274 in East). • **Enables flexible, place-based intervention** – Services such as ASC, housing, and CSC already work with local partners (e.g. Family Hubs, VCFSE, schools) to deliver support through local forums, which would be retained and enhanced under 1UA. • **Simplifies cross-cutting delivery** – Services such as mental health, substance misuse, and housing need require coordinated input across teams. A 1UA allows wraparound offers to be planned centrally and delivered locally. • **Retains current safeguarding structures** – Countywide safeguarding boards, early help pathways, and integrated commissioning would remain intact, avoiding disaggregation risk. • **Builds from neighbourhood action plans** – The Place Model already includes a neighbourhood planning model for co-produced regeneration strategies, which can be aligned to countywide outcomes under a single council.	G
	C) Ensures that financial sustainability is not achieved at the expense of service levels.	A 1UA model enables savings and efficiencies through consolidation - not service withdrawal. It allows services to be protected by reforming back-office structures, harmonising systems, and pooling reserves, particularly important in high-cost statutory functions like ASC and CSC. • **Improves efficiency through strategic consolidation** – Consolidation savings can be achieved through shared platforms, aligned contracts, and joint infrastructure investment, as confirmed through extensive engagement with both upper and lower tier service professionals.	A

		• **Supports strategic commissioning and market shaping** – A single commissioning function can set consistent pricing, improve leverage with providers, and reduce fragmentation in markets such as ASC or education placements. • **Enables financial flexibility and cross-subsidy** – Shared MTFS, pooled reserves and countywide income allow high-cost services in one locality to be sustained without placing disproportionate strain on that area's council tax base. • **Reduces service fragmentation risk** – Disaggregation of statutory services like SEND and CSC was seen by officers as high-risk under 2UA. The 1UA model removes that risk entirely. • **Supports long-term value** – Investment in digital, prevention, early help and neighbourhood working can be delivered once, reducing cost over time without cutting access or quality. • **Reinvestment in frontline service delivery** – Most of the savings noted by service professionals are across back-office functions (and not directly from already overstretched front line teams). These savings can be reinvested back in front line delivery and interventions focussing on prevention and early intervention to drive improved outcomes. • **Countywide Dedicated Schools Grant (DSG) deficit projected to reach ~£234m by Vesting Day (1 April 2028).** If statutory override is not maintained or an alternative solution implemented, then both a 1UA and 2UA would face significant financial risks. • **Impact of the Fair Funding Review** – This also remains unknown at this time presenting further financial uncertainty to both 1UA and 2UA scenarios.	

Detailed analysis of **east/west two unitaries (2UA)** model against criterion

Criteria	Sub-Criteria	Alignment Summary	RAG

1. Sensible single tier of local government	A) Establishes a single tier of local government for the whole of the area concerned.	The 2UA model fully removes two-tier governance by creating two all-purpose councils. While this simplifies governance within each new authority, it introduces an internal boundary that cuts across several existing countywide systems and partnerships. • **Removes two-tier structure** – Both county and district councils would be replaced by two new single-tier organisations which meets the overall criteria. • **Simplifies local service access** – Residents would interact with only one council for all services within their local area. • **Establishes clear internal governance** – Each authority would hold its own statutory roles and make decisions independently.	G
	B) Sensible economic breakdown: with a tax base which does not create undue inequalities	The 2UA model creates two financially independent authorities. While their tax bases are broadly similar at the point of transition, underlying income, need, and reserve disparities mean each council would have to manage its own risk, cost pressures, and investment strategies. • **Creates separate tax bases and MTFSs** – The East and West would operate independent financial strategies, with no shared reserves or risk-pooling between councils. • **Similar tax base across both areas** - The 2024 tax-base (Band D equivalents after council tax support) for two-unitary authorities model, shows a tax base in the West of 49% compared to 51% in the East [62]. • **Potential fiscal disparities** – Local Authority Debt is much higher in the West (£948) compared to the East (£674) and there is also a higher household benefit claimant rate (17.87% in the West compared to 13.79% in the East). These pressures would need to be	A

[62] Council Tax Receipts, 23/24, MHCLG

		managed by each individual authority with limited ability to create more fiscal resilience overall e.g. through pooled reserves etc. • **Increased potential exposure for West** – Higher service costs particularly for ASC where spend per resident is £629 in West vs £405 in East. This is likely to put a significantly higher pressure on the West council given the majority of a unitary authority budget is attributed to ASC Spend. • **Opportunities to drive economic growth based on the unique strengths of each authority –** Opportunities to drive a coherent narrative within each authority for their sector specialisms (Clean Energy in the West and Technology in the East). This will support in creating more job opportunities, upskilling young people and attracting inward investment to kickstart economic growth across both UA areas.	
	C) Sensible geographic breakdown: which will help increase housing supply and meet local needs	The proposed East/West boundary reflects historic district groupings but introduces a new internal division across some shared service areas and travel-to-work zones. While this may support visibility and identity at a local level, it creates complexity in coordinating planning, housing, transport, and environmental strategy, all of which currently operate at county scale. • **Builds on existing urban centres in the county –** Gloucestershire has two significant urban centres (Cheltenham and Gloucester) and the proposed East / West 2UA model aligns with these. In addition to this, the 2UA model is based on familiar district boundaries which will continue to enable the retention of unique local identities. This could also be helpful in designing place-based governance. • **Reduces alignment with partners -** The Police, Fire and Rescue, ICB, Education partners all largely operate on a countywide footprint currently and the creation of 2UAs would mean partners likely need to engage with two different organisations which is inefficient and can also drive reduced influence for each of the respective UAs.	**A**

		• **Each UA can retain its own housing and HRA –** There are currently two councils in Gloucestershire with their own housing stock (c.5,000 homes each) and Housing Revenue Account (HRA): Stroud and Cheltenham. In the proposed 2UA model, there would be minimum disruption or change required to this arrangement given one of these is in the West and one in the East. • **Challenges around private housing market** - Average house prices illustrate that the private housing market faces greater challenges in the West, where values are lower [63] (e.g. Gloucester £225,000; Forest of Dean £291,000) compared to the East (e.g. Cotswolds £419,000; Cheltenham £324,000), reducing profit margins and making it less likely that the private sector will deliver sufficient supply without public intervention. • **Variations in housing supply** –Homelessness is higher in the West compared to the East [64] (0.21% in the West and 0.11% in the East) with housing land supply following the opposite trajectory (lower in the West at 3.83 vs 4.97 in the East). This could result in more demand for housing in the West with less supply to meet this efficiently within the new UA borders. • **Risks inconsistency in spatial planning** – Without a shared framework, the East and West could pursue divergent housing policies, development standards, and regeneration priorities, which could make Gloucestershire less coherent in the eyes of investors and government. • **Fragmentation of strategic housing functions and engagement -** Fragmentation of delivery partnerships and engagement / negotiations with housing associations, developers, and Homes England, increasing the risk of inconsistency in policy, pipeline delivery, and tenant standards across East and West Gloucestershire.

[63] House Prices, 2025, ONS
[64] Homelessness, 2024, ONS

2. Right-sized local government	A) A population of 500,000 or more (unless specific scenarios make this unreasonable)	Under the 2UA model, each authority would have a population above the 300,000 minimum threshold, but below the 500,000 MHCLG guideline. The East would serve ~310,641 people and the West ~348,635. • **Meets the viability threshold** – Both authorities exceed 300,000 population, in line with recent two-unitary models (e.g. Cheshire East/West). • **Falls short of MHCLG guidance** – Neither authority reaches the preferred 500,000+ benchmark for strategic scale but this could enable each UA to target their resources and focus on manageable population sizes and geographies (noting both the East and West would each have a densely populated metropolitan area with surrounding rural areas). • **Comparable to successful precedent** – East (~310k) and West (~349k) align with other approved two-unitary areas such as Cheshire East/West, Dorset, and Somerset, which have demonstrated operational viability. • **Aligns with precedent** – Dorset and Cheshire provide examples of approved two-UA models operating at similar population sizes.	**A**
	B) Supports efficiencies and value for money for council taxpayers	The 2UA model can continue to offer some efficiencies within each authority, but also introduces duplication of systems, statutory posts, and governance. Gloucestershire also has some good examples of shared working across existing councils which can continue to be built on under a 2UA model (where beneficial and appropriate to do so). • **Creates duplication for county wide services** – County-wide infrastructure would likely need to be split or duplicated e.g. in relation to governance structures; statutory roles e.g. two Director of Children's Services (DCCs), DASSs etc; Upper tier service systems used by adults and children's services etc. This will reduce the overall net savings achievable in a	**A**

		2UA scenario (potential net revenue savings from reorganisation of ~£10.7m per annum under a 2UA model). • **Reduces potential economies of scale** – Whilst there remain continued opportunities to jointly commission specialist services e.g. cyber between the two authorities, it is possible that over time strategic contracts would be negotiated separately within each authority e.g. for Childrens and Adults. This is likely to result in less market influence and a potential risk of suppliers 'playing both authorities against each other'.	
	C) Improves capacity and supports the council to withstand financial shocks	Each new authority would need to independently build and sustain specialist teams and leadership capacity. Smaller scale may reduce resilience, particularly in hard-to-recruit areas such as social care. • **Supports competitive positioning** – Each council can engage in targeted regional partnerships (e.g. East with WECA, West with Midlands Engine) to maximise sectoral strengths and funding opportunities. • **Continued opportunities to share services in a targeted way to drive efficiencies and improve outcomes -** A 2UA model can continue to build on the strong foundation of shared services and wholly owned companies in Gloucestershire already (e.g. Ubico for waste management, Publica for transactional services, One Legal, audit and counterfraud etc). However, this can be done in a targeted way to enable the 2UAs to operate independently where tailored approaches are required to serve their populations but come together to achieve scale where it drives more value and increases resilience / capacity e.g. continuing to operate waste collection via Ubico to reduce costs, offer improved scale and a more consistent offer to residents. • **Overall tax base similar across both UAs –** There is not likely to be significant variations in total council tax receipts between both UAs.	**A**

		• **Increased senior officer capacity** – In a 2UA model, both authorities may have to recruit for identical senior officer roles, allowing for greater capacity in senior leadership. • **Could result in a significant financial burden for the West authority –** Given the significant imbalance in demand and cost between the East and West for ASC (e.g. £405 spend per resident in East v/s £629 in West), there could be a significant risk around Ordinary Residence implications which could create a financial challenge for the West authority. • **Reduced workforce resilience -**Smaller teams are more exposed to capacity pressures and recruitment risk, especially in specialist roles. Service leads flagged risks in safeguarding, SEND, commissioning, and public health with concerns that "we'll each be half as strong". • **Limits financial flexibility in hardship** – Without pooled reserves or a shared workforce, each council would need to absorb shocks (e.g. market failure, inflation) independently which does reduce overall financial resilience for both statutory and non-statutory services. • **Additional overheads / administrative burden for shared services –** Where services are retained as shared, there is likely to be additional costs of managing governance, performance, budgetary allocations, potential disputes etc. • **Potential budget deficits for the West on day one -** Current financial analysis indicates that the East council in a 2UA scenario would be established with a day one General Fund surplus of ~ £21.9m. Whilst a West council would be established with a day one General Fund deficit of ~ £21.9m. This assumes the full delivery of unidentified savings required by all seven councils between now and Vesting Day (1 April 2028) and does not fully account for the impact of the Fair Funding Review (subject to further detail from government).	
	D) Manageable transition costs	Transitioning to two authorities would involve higher implementation costs and programme complexity compared to a single authority (currently estimated at ~ £29.0m). This means potentially	**A**

		higher legal, staffing, ICT, and governance setup costs than a single-authority model, alongside increased programme complexity and coordination risk. • **Requires two sets of transition and implementation governance** – Two constitutions, two electoral reviews, two consultations, two shadow authorities, and dual branding would be required. • **Lowered aggregation risk -** A 2UA model would require aggregation of three district-specific services into one collective service per region, resulting in reduced administrative and transitional risks for aggregated services. • **Disaggregation of systems and contracts** – High-risk, high-cost systems like Liquidlogic, Capita One, SAP, and GIS platforms would need to be split or reprocured, which are flagged as major risks and costs from discussions with service leads across ASC, ICT, and education. • **Increased implementation portfolio staffing costs -** Two separate transition and implementation portfolio teams are likely to be set up (noting close working between the two in some areas). This is likely to result in additional internal and external costs particularly in areas such as programme management, Legal and governance support, IT support etc. • **Prolonged implementation timelines -** Shadow arrangements, TUPE consultations, contract revisions, and legacy system exit timelines could vary between East and West. • **Additional ongoing costs of additional shared services arrangements** - Any new shared services arrangements (e.g. potential considerations around coroners, registrars, archives etc) would require formal governance and charging frameworks to operate across both councils which are likely to add increased ongoing running costs and effort to delivery. • **Costs to key services –** Essential services such as ASC and CSC require the appointment of statutory senior roles. These positions are mandated by law and therefore represent unavoidable costs that will be incurred by both councils.	

3. High quality, sustainable services	A) Improves local government and service delivery, avoiding unnecessary service fragmentation	The 2UA model would require the disaggregation of services that are currently delivered at county scale. This may increase the risk of fragmentation and inconsistency, especially where delivery depends on cross-county governance or shared systems. Delivery challenges have also been noted by stakeholders from the VCFSE sector particularly given increased duplication, fragmented commissioning, and reduced ability to coordinate delivery at scale. • **Aligns delivery to distinct area profiles** – East could design services around its rural access needs, building on the Cotswolds' established community transport networks and the Tewkesbury Garden Communities. West could integrate regeneration and safeguarding priorities for Gloucester and the Forest of Dean. • **Strengthens local partnerships** – Smaller geographies make it easier to work intensively with anchor institutions such as the University of Gloucestershire in the West and Royal Agricultural University Cirencester in the East, embedding them into local economic and education strategies • **Potential disruption to countywide transformation pipelines** – Significant multi-year transformation and digital programmes, largely at county level, already underway would likely need to be paused and rescoped for each authority – This could slow down improvements to service delivery. • **Requires disaggregation of critical countywide services** – ASC, CSC, education, SEND, public health, emergency planning, transport would each need to be split out in a 2UA scenario (or at a minimum with some form of shared arrangements in place to enable delivery across two sovereign organisations). Given the statutory responsibilities associated with these services and the legislative requirements and governance, it is most likely services would need to be fully disaggregated to maintain clarity in accountability and enable long-term service stability. While this is possible, it is noted it will be extremely complex e.g. issues regarding ordinary residence (i.e. who pays for the cost of delivery) in social care as well as the disparity of need across the two unitary authorities.	**A**

		• **Requires the creation of a standalone Fire and Rescue Authority -** Under the provisions in the Fire and Rescue Services Act 2004, fire and rescue will need to move to non-local authority governance, financial, and service arrangement (i.e. the creation of an independent Fire and Rescue Authority), which will incur additional costs and may increase risk to sustainable service provision. • **Reduces potential operational flexibility for transport and highways services** - Operational flexibility may be reduced if contractors are restricted to specific UA boundaries, limiting the ability to respond efficiently to local issues. • **Introduces governance complexity** – Safeguarding, legal, and commissioning leads confirmed that multi-agency boards would need to be split or restructured, adding complexity to ICB engagement and joint delivery with NHS and Police. • **Could lead to variation** – Differences in resources, priorities or capacity could lead to divergence in how services are delivered across the two areas with residents close to boundaries experiencing variations in provision. • **Disaggregation introduces risk of fragmentation** – Education, ASC and public health services warned that users moving between East and West may face different systems, policies, and access routes. • **Challenges for cross-border services** – School trusts, Multi-Academy Trusts (MATs), and regional partnerships may have to deal with two education strategies, SEND policies, and admissions frameworks, which was flagged by GAPH and FE as significant risks to consistency and collaboration. • **Place-based delivery becomes harder to coordinate** – With two sovereign councils, divergence in how neighbourhood models are resourced and prioritised becomes more likely. • **Lack of a unified capital programme** - Service leads across strategic finance, ASC, and planning emphasised the importance of a unified capital programme that allows resources to flow toward the county's most deprived areas, including Gloucester, Cheltenham, and the Forest, without needing to negotiate priorities between councils.	

		• **Examples of inter-authority collaboration** - Gloucestershire already operates several shared service models, including Ubico, One Legal, Publica, and shared audit arrangements. These demonstrate that inter-authority collaboration is possible and has worked successfully in Gloucestershire. *However, it is important to note that professional service leads emphasised that disaggregating countywide statutory functions such as ASC, CSC, and public health would be significantly more complex than these current arrangements given the significant cost, legal and care implications associated with them.*	
	B) Opportunity for public service reform including where this will lead to improved value for money	Each new authority would be responsible for designing and funding its own service transformation agenda. While local flexibility may increase, fragmentation of platforms and investment plans may limit the pace and scale of change. • **Enables local flexibility** – each council can shape its own digital investment, reform priorities, and neighbourhood model in line with community needs and political ambition, alongside being agile and flexible enough to implement • **Focused investment in area-specific reforms** – The East could prioritise digital health outreach and rural connectivity upgrades, and the West could channel regeneration funds into brownfield redevelopment and city-centre renewal in Gloucester, as identified in local growth plans. • **Reduces scale for innovation** – Smaller transformation budgets and teams may limit ability to adopt digital and analytics tools at pace. • **Increases technology fragmentation** – Without aligned procurement, the two authorities may implement incompatible systems (e.g. finance, social care case management, HR), reducing future interoperability and driving long-term inefficiency.	**A**

		• **Undermines shared learning and replication** – Innovation tested in one council may not scale to the other, limiting transferability of successful models and requiring duplicated discovery work and investment.	
	C) Improves delivery of, or mitigates risk to negative impact on crucial services	Separate authorities could create inconsistency in design and delivery of crucial services. • **Risk to homelessness prevention** – Housing and homelessness services flagged that disaggregating commissioning and housing capital programmes could make it harder to manage countywide pressures, especially with differing homelessness rates in both regions (0.21% in the West and 0.11% in the East) • **Public safety governance** – Disaggregating safeguarding structures would require new MASA boards and potentially separate Police partnership frameworks. Senior Police stakeholders stressed that this could weaken consistency of response in child protection and community safety. • **Disrupts end-to-end service planning** – Care pathways, school placement systems, early help, and transition into adult services are all currently managed across one system, and disaggregation would complicate coordination and risk continuity. In addition to this, splitting services like admissions, EHCPs and SEND into East/West would create division over time and risk undermining delivery. • **Disruption to hospital discharge and integrated care pathways** - This is an area of concern for service professionals, particularly as Gloucestershire Royal Hospital, located in the West, serves as the county's central acute site. The countywide discharge-to-assess (D2A) model, which provides short-term bedded care for assessment (Pathway 2), often leads to placements that become individuals' long-term homes. Introducing a requirement to source placements based on the boundaries of two separate unitary authorities, depending on ordinary residence, could reduce placement options and delay discharge processes.	**A**

		• **Ordinary residence implications for ASC -** The challenge around 'Ordinary Residence' is not only operationally / financially complex but impacts the most vulnerable residents if there are implications in terms of moving people across the County specifically those with long-standing placements. • **May increase outcome variation** – Differing financial starting points, access to reserves, and workforce size could affect ability to maintain parity of service quality. In addition to this, divergent policies on exclusions, admissions, and SEND support could result in inequity between areas. • **Inequitable access for vulnerable residents** - Splitting education commissioning and admissions could lead to inequitable access to the county's 14 specialist schools, especially for children with rare needs. • **Disruption to home to school transport (HTST)** - due to disaggregated placement decisions and geography, particularly availability of drivers, fleet, and routes to special schools. • **Requires robust governance and assurance** – Without shared framework; monitoring, escalation, and intervention pathways may vary - which service leads warned could expose gaps in statutory performance (e.g. SEND timeliness, EHCP outcomes). • **Creates complexity for regional partners** – Public health, education and safeguarding professionals expressed concern about splitting countywide responsibilities and the need to co-manage performance across two legal bodies. • **Increase in out of county placements** – The creation of 2UAs would create an additional border for the county and result in working an 'out of county' services model, for services which sit within the same postcode.	
4. Meets local needs	A) Meets local needs and is	The 2UA model aims to reflect established localities, with an East/West split broadly aligned to existing district boundaries. This may support a stronger sense of local identity and enable more	**A**

	informed by local views	localised leadership and governance. However, some stakeholders raised concerns that splitting into two authorities would risk 'fragmenting already fragile cross-county partnerships' and pull focus away from place-wide strategies for education, health, and climate. • **Localities do not always follow district lines** - Some communities span the proposed boundary or rely on countywide services and networks. The 2UA model risks weakening connections between these areas. Alongside this, Education, safeguarding and housing teams noted that many communities rely on shared infrastructure and networks. A 2UA model risks creating artificial barriers around lived geography. • **Supported by some local voices –** Stakeholders in Cheltenham and some parish councils suggested that smaller units may improve visibility and local responsiveness. • **Risk of undermining cross-county place design** – The Place Model assumes consistent Neighbourhood Partnerships and locality governance. Splitting delivery governance may result in inconsistent coverage or investment. • **Some community feedback highlighted risks around marginalising communities** – The Diocese and parts of the VCFSE sector expressed concern that splitting Gloucestershire would further marginalise communities already on the edge, especially in rural transition zones like the Severn Vale and North Cotswolds. • **Some resident feedback highlighted concerns around creating a divide** - Concerns were consistently noted by some residents (who responded to a survey issued out by all Gloucestershire councils in July 2025) around fairness, division, and efficiency – with particular references to "creating a rich side and a poor side of the county".	
	B) Improves / mitigates risk to issues of local identity, cultural	The 2UA model allows each new council to retain visible place identity, which may strengthen civic pride. It supports branding and ceremonial continuity, but only if local governance and engagement are properly resourced and consistent.	**A**

	and historic importance	• **Aligns to known geographies** – District geographies in the East and West already support local branding, parish engagement, and heritage-based governance. • **Reflects distinct demographic and community profiles** – EQIA work suggests the East UA combines a more diverse urban centre (Cheltenham) with older rural areas (Cotswold, Tewkesbury), while the West UA combines Gloucester's higher ethnic diversity with older rural communities (Forest of Dean, parts of Stroud). This supports locally tailored equalities frameworks across both UAs. • **Enables place-led branding** – East could emphasise its international tourism offer around the Cotswolds, Regency Cheltenham, and cultural festivals; West could promote the Forest of Dean's green heritage and industrial legacy and Gloucester's historic docklands regeneration as part of its identity. • **May enhance local connection** – Smaller organisations may allow residents to feel more seen, particularly in distinct areas like the Forest, Cotswolds, and Stroud Valleys. • **Strengthens local heritage partnerships** – Smaller authorities could work more intensively with heritage bodies, e.g. Gloucester Cathedral Chapter in the West and Cotswold Conservation Board in the East, to protect and showcase local assets. • **Not a guarantee of civic strength** – As several service leads noted, "having smaller boundaries doesn't automatically deliver stronger community governance." Success depends on local design and sustained political investment. • **Civic identity retained** – Town and parish councils, mayoralties, and ceremonial roles would remain in place. For Gloucester a parish (city council) would be created, and for Cheltenham, options would be considered for parishing unparished areas of the town. These new parishes would serve to strengthen the identity and significant cultural and historic value of each city/town within Gloucestershire • **Supports continuity of place names** - Councils can adopt names, branding, and narratives rooted in local geography and history.	

		• **Inconsistent rollout of locality models** – Without a shared vision or resourcing strategy, Neighbourhood Partnerships and area boards may develop unevenly between the two councils, risking postcode variation in access to voice and influence. • **Risk from divergence in civic promotion -** Without coordinated messaging, the two councils could present different external identities for Gloucestershire, weakening the countywide brand. • **Heavy focus on the two urban centres** - Findings from local engagement with residents in July 2025 highlighted that it could be difficult to create local identities for each unitary that do not revolve around the largest towns which would exclude other areas.	
	C) Addresses local concerns	The 2UA model could also increase inconsistency in service design and delivery unless shared frameworks are agreed. • **Enables localised service design -** West Gloucestershire could focus on tackling urban deprivation and higher ASC/CSC demand, drawing on targeted regeneration in Gloucester and the Forest of Dean. The East could prioritise rural access needs, while maximising the economic impact of Cheltenham's Golden Valley Development and related secure tech sector, alongside the Cotswolds' tourism and agri-tech industries • **Magnifies financial and capacity disparities** – Demographic and Economic data shows that the West has higher ASC costs, higher household benefits claimant rates, higher homelessness, lower income, and higher deprivation. This may create potential challenges for the West Authority in terms of financial resilience and the ability to meet local needs effectively. • **Opportunities for joint working will remain across the 2UAs** – Employment zones, housing markets, transport corridors, and flood risk do not respect the East-West divide. For example, major commuting flows link Cheltenham, Gloucester, and Tewkesbury across the	**A**

		proposed boundary; the Golden Valley tech corridor and proposed Severn Edge energy project both require countywide planning to maximise investment potential.	
5. Supports devolution arrangements	A) Helps to support devolution arrangements / unlock devolution	In a 2UA structure, each new council would be the accountable body for its own area so there would not be a single Gloucestershire voice in national negotiations for devolution. • **Scope for tailored devolution asks** – Two councils could negotiate complementary but distinct devolution priorities, enabling the East to focus on innovation and cyber skills linked to The Innovation Village at Royal Agricultural University Development, while the West prioritises clean energy investment and infrastructure for the Berkeley Site. • **Potential to broaden regional alliances** – East could strengthen alignment with WECA and Oxfordshire for tech and high-value manufacturing; West could align with Worcestershire/Herefordshire or the West Midlands to secure agri-tech, tourism, and industrial regeneration funding. • **Could increase coordination demands** – The two councils may need to join up on priorities, funding bids, and delivery models for housing, transport, skills, and climate programmes to drive increased influence and negotiating power. • **Adds negotiation complexity** – Government may seek assurance that the two councils can act with unity on countywide matters. Stakeholder feedback from FE colleges and the VCFSE sector emphasised that clarity of leadership is essential to secure confidence from Whitehall. • **Risks divergence in place vision** – Without a shared countywide strategy, the two councils could set different priorities for Neighbourhood Partnerships, local regeneration, and climate action, weakening a consistent Gloucestershire offer in negotiations. • **Feedback from Economic development and planning**: Service leaders in economic development and planning warned that without joint frameworks for infrastructure, skills, and housing, the county's competitive edge could be diluted in a crowded regional market.	**A**

		• **May require dual representation** – Combined Authorities like WECA or Oxfordshire may need to engage with two Gloucestershire councils, complicating governance and coordination. • **Place delivery risks** – Without countywide oversight, devolved funding for Neighbourhood Partnerships could be designed and resourced differently between East and West, creating variation in local empowerment models.	
	B) Sensible population size ratios between local authorities and any strategic authority	Under a 2UA model, Gloucestershire would be split into two councils, East and West, with populations of ~310,000 and ~349,000. There is a chance that each of the two UAs may join a different strategic authority if there is political divergence which has implications for scale and coherence. • **Still meets 1.5m minimum if coordinate groupings** – If both councils join different groupings (e.g. East joins WECA; West aligns with West Midlands), the full benefits of scale could be lost, and we could fall short of the minimum thresholds, but if they coordinate with each other then the minimum thresholds can be met • **Worcestershire and Herefordshire group** - Two smaller Gloucestershire authorities would cause concerns around meeting the minimum 1.5m benchmark in all potential combined authority scenarios e.g. Herefordshire and Worcestershire have a combined population of c.806,000 so if only of the one Gloucestershire authorities was to form a combined authority with these two areas, this would fall short of the minimum 1.5 million threshold (at a max, it would be c.1.2m). • **Flexibility in regional partnerships** – By joining different Combined Authorities, each council could target the most relevant funding streams and policy platforms for its local economy, increasing the total range of investment opportunities for Gloucestershire. • **More comparable relative size with partner authorities -** In terms of relative size of two smaller Gloucestershire authorities compared with potential partners, this may be more	G

		palatable. The populations of c.300,000-350,000 for Gloucestershire would not be significantly higher than potential partners particularly in the case of a WECA option.	
6. Local engagement and empowerment	A) Enables stronger community engagement	By reducing the size of each council to ~310k (East) and ~349k (West), the 2UA model could allow councillors and officers to work more closely with their local communities. Some stakeholders believe this scale feels more approachable than a single countywide body. However, the quality of engagement would depend on how each council designs, resources, and sustains its locality governance model. • **Smaller footprint may improve visibility** – Members and officers could be more locally embedded, with shorter travel distances and potentially closer relationships to communities. • **Allows more localised decision-making** – Committee structures and warding arrangements can be designed to reflect local culture, population density, and settlement patterns in each area. • **Service leads stressed importance of design** – ASC, CSC, and housing officers emphasised that engagement structures need dedicated staffing, budget, and authority to work effectively, with size alone not guaranteeing impact. • **Improved councillor–resident connection** – Smaller populations and geographies make it easier for members to be directly accessible, as already seen in district-level ward surgeries in Stroud, Cotswold, and Cheltenham. • **Potential to embed local culture in governance** – Allows warding and committee structures to reflect distinctive settlement patterns, e.g. rural parish clusters in the Cotswolds or ward-based representation in Gloucester. • **Risk of inconsistency** – Each authority may take a different approach to engagement, leading to uneven governance strength across the county.	G

		• **Maintaining partner coherence is harder** – VCFSE and parish representatives warned that cross-county organisations may face duplication in engagement, consultation, and partnership work.	
	B) Delivers genuine opportunities for neighbourhood empowerment	Each authority would be responsible for designing and maintaining its own locality governance offer in a way that aligns with its geography, culture, and service profile. This could create opportunities for innovation but risks fragmentation if frameworks are not aligned. There is strong support around an emphasis on neighbourhood-level engagement and the creation of place-based structures that reflect where people live. Feedback suggested that two smaller councils might 'create stronger local ties,' but this would depend heavily on capacity and willingness to devolve power within each. • **Allows place-based design** – Each council could shape governance in dialogue with parish and town councils, community groups, and residents to reflect local traditions and priorities. • **May reflect civic identity more closely** – The West could prioritise structures for strong rural parish engagement in the Forest and Stroud Valleys, while the East could focus on urban–rural connectivity in Cheltenham, Tewkesbury, and the Cotswolds. • **Scope to pilot local decision-making** – Smaller councils could trial devolved budgets for specific localities, mirroring models in Buckinghamshire and Dorset, but adapted to Gloucestershire contexts. • **Encourages innovation in community partnerships** – Each authority could adapt the Neighbourhood Partnership principles to local capacity and needs, enabling diversity in engagement while keeping community leadership central. • **Risk of fragmentation in place delivery** – The Place Model envisions consistent Neighbourhood Partnerships across Gloucestershire. Under 2UA, these could evolve differently in each council, leading to unequal investment or capability.	G

		• **Risk of duplication or gaps** – Where partnerships (e.g. safeguarding boards, housing associations, climate forums) span the East–West boundary, separate locality models could create administrative complexity and reduce efficiency. • **Risk of democratic deficit** – By removing layers of government, some residents may feel as though the unitary is far removed from their local issues which can decrease engagement.	
7. Environmental and climate protection	A) Ensures the new authority/authorities have clear capabilities to deliver existing and future climate and nature plans.	The 2UA model could potentially mean splitting existing specialist teams, strategies, and funding streams, creating a higher risk of inconsistency and duplication. • **Could still retain strategic Climate Leadership Gloucestershire –** This already operates across seven councils currently and could continue to provide an overarching collaboration mechanism between the two UAs to strategically coordinate some activities where scale offers improved outcomes / efficiencies. • **Requires duplication of plans and delivery** – Each council may produce separate climate and nature plans, scrutiny arrangements, and reporting cycles, increasing administrative cost. • **Risks weaker investment leverage -** Countywide funding bids (e.g. for nature recovery, flood defence, EV charging infrastructure) may lose scale and competitiveness if submitted separately. • **Feedback from Flood Risk and Planning leads** – Officers stressed that some climate and flood issues are inherently cross-boundary and require shared governance to avoid duplication or gaps. • **Neighbourhood Partnerships could diverge** – Without a shared approach, local environmental action plans could vary in scope, resourcing, and ambition between East and West.	G

	B) Reflects local priorities in areas with sensitive landscapes (e.g. Forest of Dean, Cotswolds AONB).	The 2UA model is still likely to require cross-boundary coordination for shared natural systems. • **Aligns to clear geographic distinctions** – East: Cotswolds AONB, river catchments, rural agricultural land; West: Forest of Dean, Severn Estuary, urban-rural interface. • **Still requires joint governance for shared assets** – River catchments, wildlife corridors, and flood plains cross the proposed boundary would need shared planning and investment to remain effective. • **Service leads warned of coordination risk** – Planning and environmental health officers flagged that without aligned design codes and infrastructure plans, developers and land managers could face conflicting requirements in different parts of the county.	G
	C) Builds on existing commitments (e.g. "Fairer Greener Forest", Climate Emergency responses).	Each authority would be able to maintain and expand current district-led climate commitments, but with differing capacities and investment potential depending on their starting points. • **Allows continuity of local plans** – Existing commitments like “Fairer Greener Forest,” Stroud’s climate strategy, and Cheltenham’s climate targets could be retained and developed. • **Maintains political accountability** – Climate and environmental decisions would remain close to elected members and communities, which some stakeholders believe would encourage stronger local ownership. • **Requires alignment where appropriate** – Shared goals such as emissions reduction, transport decarbonisation, and biodiversity corridors would still need coordinated policy to prevent gaps or duplication. This is particularly relevant to countywide assets like the proposed Severn Edge project, which spans clean hydrogen, nuclear, and synthetic aviation fuel production, and contributes directly to Gloucestershire’s net zero targets. This is	G

		something that could be coordinated by a strategic countywide forum (building on the existing Climate Leadership Gloucestershire principles).	
8. Civic engagement and participative democracy	A) Promotes civic engagement and strengthens participative democracy.	Both authorities would be able to develop civic engagement strategies suited to their geographies and communities. The smaller scale may enable closer relationships between councils and residents, but investment and commitment will vary depending on resources and leadership. • **May feel more accessible to residents** - Councils serving 310k–350k residents may be seen as more approachable, with shorter decision chains and closer member–resident relationships. • **Risk of unequal investment** - Financial or political priorities may lead to different levels of civic participation infrastructure. • **Requires long-term commitment** - Strong participative democracy relies on consistent leadership and culture, not just structural change. • **Risk of democratic deficit -** Given LGR will reduce the number of elected councillors and create larger electoral divisions, this will increase the number of residents each councillor represents. This could risk a democratic deficit.	**A**
9. Inclusive growth and equity	A) Ability to tackle disparities in wealth setting up one unitary authority or two unitary authorities.	The 2UA model would allow each council to focus on its own economic geography and priorities, which may improve local targeting of interventions. However, without a shared tax base or pooled reserves, there is no direct mechanism to redistribute resources between East and West, meaning inequalities may persist or grow over time without intervention.	**A**

		• **Greater ability to focus on local economic drivers** – East could align its growth strategy to maximise Cheltenham's festival economy, and Cotswolds tourism; West could drive regeneration of Gloucester's city centre redevelopment, and Forest of Dean industrial renewal. • **Limits redistribution capacity** – Income and demand would need to be managed independently, reducing ability to manage known variations and inequalities across the East and West. • **Service leads voiced concern** – Finance, ASC, and CSC officers warned that over time, the West could face greater difficulty sustaining service quality and investment without a countywide balancing mechanism. Demographic projections show the West has higher deprivation levels and demand pressures. This has implications for long-term financial sustainability, preventative care, and integration with NHS partners. • **Neighbourhood regeneration may diverge** – The Place Model's ambition for consistent Neighbourhood Partnerships could be undermined if each council invests at different levels in deprived areas. • **Risk of splitting resources** - EqIA analysis shows that economic challenges are different in each part of the county and can affect groups protected under equalities law. In the West, young people face higher unemployment. In the East, there is less access to apprenticeships and training, which can particularly impact young people and disabled residents. A 2UA model could target these local issues more directly, but splitting resources may make it harder to run countywide programmes to reduce these gaps.	
	B) Prioritises vulnerable residents and community-level regeneration.	The scale of need, particularly in the West, may place more pressure on local finances and delivery unless partnership structures or funding mechanisms are established. There is a risk that different parts of Gloucestershire could become aligned to different combined authorities fragmenting influence and complicating engagement with regional priorities.	G

		• **Closer integration with local VCFSE networks** – Smaller councils could embed local community organisations (e.g. GL Communities in the West, Cotswold Friends in the East) directly into regeneration planning, improving reach and trust • **Exposes resource gaps** – The West's higher need may not be matched by local income, making it harder to fund regeneration and preventative work without external support. • **Requires robust local commissioning** – Each council would need strong capability to identify, fund, and measure interventions, which was a challenge raised in ASC and housing disaggregation discussions with service professionals, where market capacity varies significantly between East and West.	
	C) Ensures that financial sustainability is not achieved at the expense of service levels.	With two independent MTFSs, each council would control its financial decisions, giving flexibility to align budgets with local priorities. However, without shared reserves or risk pooling, cost pressures in high-demand services could lead to service reduction, particularly in the West. • **Enables local control over budgets** – Each authority can shape its own financial strategy to align with its values and priorities. • **Enables targeted financial planning** – East could direct reserves toward rural health access; West could prioritise safeguarding and early intervention in high-need urban areas. • **Potential to attract different funding streams** – Separate authorities could pursue distinct grant opportunities, widening the overall pool of external investment brought into Gloucestershire. • **Increases pressure on high-cost services** – The West, with higher ASC and CSC spend per resident, may face difficult decisions if cost pressures outpace funding. • **Creates risk of service variation** – One council may be able to protect frontline services more easily than the other.	**A**

		• **Could require trade-offs** – Without pooled reserves or cross-council subsidy, service levels may be more exposed to short-medium- and long-term budget constraints. • **High Needs funding uncertainty** – Stakeholders raised concerns about how Gloucestershire's current countywide High Needs deficit would be apportioned fairly, warning that uneven settlement could undermine education support in one area. • **Countywide Dedicated Schools Grant (DSG) deficit projected to reach ~£234m by Vesting Day (1 April 2028).** If statutory override is not maintained or an alternative solution implemented, then both a 1UA and 2UA would face significant financial risks. • **Impact of the Fair Funding Review -** This also remains unknown at this time presenting further financial uncertainty to both 1UA and 2UA scenarios.	

Appendix 6: Proposed Service Delivery Models

Scope of services considered

Corporate services

- Digital & ICT
- Asset Management & Property
- Strategic Finance
- Pension Fund
- Insurance & Counter Fraud
- HR
- Transactional Services incl. Payroll, AP / AR
- Legal Services (Incl. One Legal)
- Democratic Services & Elections
- Communications
- Transformation
- Planning, Performance & Insight (Data)
- Information Governance
- Customer Management

Front-line upper tier services (only county council services currently)

- Public Health
- Adult Social Care
- Children's & Education
- Transport & Highways
- Archives
- Fire & Rescue
- Trading Standards
- Coroners
- Libraries
- Registrars
- Employment and Skills

Front-line lower tier services OR both (only districts OR both county and districts currently)

- Public Protection
- Emergency Planning
- Revenue & Benefits
- Housing Strategy, Maintenance & Homelessness
- Leisure & Culture
- Economy & Sustainability (incl. Tourism & Visitor Economy)
- Planning & Building Control
- Development & Regeneration
- Waste & Environmental Services
- Parking
- Cemetery and Crematoria

Defining the key parameters used

	High	Medium	Low
Change Required - Transformation or alignment needed to realise the benefit.	**Fundamental redesign of team structure, roles, and processes; introduction of new systems or services; significant cultural change.**	**Moderate restructuring, role changes, or process improvements; some new tools or systems introduced.**	**Minor adjustments to workflows or responsibilities; no structural or system-wide changes.**
One - off Costs - The upfront investment required to implement the change	**Over £1,000,000 – Includes major IT systems, infrastructure, consultancy, or large-scale training programmes.**	**£500,000–£1,000,000 – Includes moderate system upgrades, recruitment drives, or targeted training.**	**Under £500,000 – Includes minor equipment, short-term consultancy, or small-scale training.**
Recurring Cost - Ongoing annual expenses to maintain or operate the new arrangement.	**Over £500,000 annually – Ongoing staffing, licensing, or service delivery costs.**	**£250,000–£500,000 annually – Include staffing, subscriptions, or maintenance.**	**Under £250,000 annually – Minimal ongoing costs such as software licences or admin support.**
Aggregation Benefits - The benefits of aggregating services based on both financial and non financial benefits	**Strong efficiencies and strategic gains from combining services; consistent delivery and reduced duplication.**	**Some coordination and savings achieved, but benefits are limited**	**Minimal improvement realised through aggregation**

Corporate Services

Corporate Services | Summary (1 of 3)

			2UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Digital & ICT**	Different delivery models across the Councils. County / Tewkesbury / Glos City / Stroud - In-House Cotswold / Forest of Dean / Chelt - Publica	**Two separate in-house teams, one per unitary.** *(Noting that some specialist functions e.g. cyber security,* *(Noting that some specialist functions e.g. cyber security, hardware and software may be jointly outsourced / shared across the two)*	**High**	**High**	**Low**	**Medium**
Joint Officers meeting	**Asset Management & Property**	**All councils currently deliver property and asset services largely in-house.** *However, there are external consultants and framework partners utilised for specialist services by councils.* *Note services previously delivered by Publica were brought in house with the exception of one health and safety advisor.*	**Hybrid: In-house strategic teams with some shared services of technical functions under an SLA and hosted arrangement.** *Strategic ownership and direction would remain local to each authority.* Note: This excludes commercial property	**High**	**Medium**	**Medium**	**Medium**
County Council Officer meeting	**Pensions**	**Operated and administered in-house via the Gloucestershire Pension Fund within GCC for all councils in Glos**	**One of the two new UAs is designated as the administering authority for the Gloucestershire Pension Fund;** the other becomes a scheme employer within the fund (similar to current arrangements with district councils).	**Low**	**Low**	**N/A**	**Low**
No discussions so far	**Strategic Finance**	**In House**	**Two separate in-house teams, one per unitary.**				
No discussions so far	**Insurance & Counterfraud** ***CFEU*** ***ARA*** ***SWAP – South West Audit Partnership***		**Shared Countywide Service –** Hosted in the east with traded services				

Corporate Services | Summary (2 of 3)

			2UA				
Engmnt to date	Service Area	Current delivery model	Recommended Delivery Model	Level of change required	One off Transition Costs	Additional ongoing recurring costs	Aggregation Benefits
Joint Officers Template	**Democratic Services**	**In-House across all councils**	**Two separate in-house , one per unitary** with local delivery teams. Also combined Democratic services and elections teams into one team.	**Low**	**Low**	**Low**	**Medium**
	Elections	**In-House across all councils**	**Two separate in-house , one per unitary** with local delivery teams. Also combined Democratic services and elections teams into one team.	**Low**	**Low**	**Low**	**High**
No discussions so far	**Legal Services** **Incl. One Legal**	**Mixed –** One Legal between 4 councils, quasi shared service between 2 councils and in-house for county	**Hybrid:** shared services or hosted on day 1 –with some functions independent and traded services. Will need 2 monitoring officers				
No discussions so far	**Comms**	**In house**	**Two separate in-house teams, one per unitary.**				
No discussions so far	**HR**		**Two separate in-house teams, one per unitary.**				
No discussions so far	**Transactional Services incl. Payroll, AP / AR**		**Shared service – hosted by one of the two organisations with traded services**				
No discussions so far	**Planning, Performance & Insight (Data)**	**In house**	**Two separate in-house teams, one per unitary**				

Corporate Services | Summary (3 of 3)

			2UA				
Engmnt to date	Service Area	Current delivery model	Recommended Delivery Model	Level of change required	One off Transition Costs	Additional ongoing recurring costs	Aggregation Benefits
No discussions so far	**Information Governance**	**In house**	**Two separate in-house teams, one per unitary**				
No discussions so far	**Transformation**	**In house**	**Two separate in-house teams, one per unitary**				
No discussions so far	**Customer Management**	In house	**Two separate in-house teams, one per unitary**				
No discussions so far	**Internal audit**	**Tewkesbury** – In-House **Cheltenham, Cotswold and Forest of Dean** – South West Audit Partnership (SWAP) **Gloucestershire County** – In-house service which is also provided to Gloucester City Council and Stroud.	**Delivery model to be determined following an options analysis of the different options.**				

Front-line upper tier services

Front-Line Upper Tier Services | Summary (1 of 3)

			2UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Public Health**	**In-House management & advisory with a range of commissioned services**	**Two separate in-house, one per unitary** *(disaggregated)* *Noting that there is still likely to be joint working in some limited areas where it makes sense to retain county wide provision and economies of scale e.g. sexual health.* *Will need* **2 DHPH** Could be joint commissioner of supply chain e.g. - out of hours	**High**	**Medium**	**Medium**	**Medium**
Joint Officers meeting	**Adult Social Care**	ASC is **delivered in-house by GCC**, and the care market is managed centrally, with countywide contracts and provider relationships	**Two separate in-house , one per unitary with its own DASS.** *(disaggregated)* delivered locally Noting: commissioning may take between 3 - 5 years to fully disaggregate. Commissioning jointly on areas e.g. - tech enabled care	**High**	**High**	**High**	**Medium**
Joint Officers meeting	**Childrens**	**Mixed Delivery Models** The service is managed overall in-house but there are also a number of elements of the service commissioned out e.g. Family and Youth Hub development	**Two separate in-house , one per unitary** *(disaggregated)* each undertaking their own commissioning and statutory partnership arrangements Will need 2 DCS And become 2 members of Adoption West	**High**	**High**	**High**	**Medium**
	Education	**In-house** *Note: Cross-authority music service*	**Two separate in-house , one per unitary** *(disaggregated)*	**High**	**High**	**High**	**Medium**

Front-Line Upper Tier Services | Summary (2 of 3)

			2UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
County Council Officer meeting	**Archives**	**In-house**	**Shared Countywide Service -** *Hosted by West given this is where the Heritage Hub is (Gloucester).*	**Low**	**Low**	**Low**	**N/A**
Joint Officers meeting	**Transport & Highways**	**In-House** With outsourced service delivery	**Two separate in-house , one per unitary** *(disaggregated)* Commissioning but flexibility on supply chain (over the long-term) but on day 1, may have to have the service hosted in one authority and providing services to the other.	**High**	**High**	**High**	**Low**
County Council Officer meeting	**Fire & Rescue**	**In-House -** GCC currently holds the governance and service responsibilities.	**Independent Fire and Rescue Authority** Legally cannot remain in-house	**High**	**High**	**N/A**	**N/A**
County Council Officer meeting	**Trading Standards**	**In-House**	**Two separate in-house teams, one per unitary**	**Medium**	**Low**	**Low**	**N/A**
County Council Officer meeting	**Coroners**	**In-House**	**Shared Countywide Service (Hosted) -** Hosted by the West as the Coroner's court is located in Gloucester	**Low**	**Low**	**Low**	**N/A**

Front-Line Upper Tier Services | Summary (3 of 3)

			2UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
County Council Officer meeting	**Libraries**	**In-House**	**Two separate in-house , one per unitary** *(disaggregated) Joint* Library Management System	**Low**	**Low**	**Low**	**Low**
County Council Officer meeting	**Registrars**	**In-House**	**Shared Countywide Service -** Hosted *TBD which authority would be the host with shared Proper Officer*	**Low**	**Low**	**Low**	**N/A**
County Council Officer meeting	**Employment and Skills**	**In-House**	**County wide, Hosted by one authority**	**Low**	**Low**	**Low**	**N/A**

Front-line lower tier services OR both (only districts OR both county and districts currently)

Front-Line Lower Tier Services | Summary (1 of 3)

			2UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Public Protection**	**Mixed.** Most services are delivered in-house by district councils though Publica provides services for Forest of Dean and Cotswold with some local differences. There are also some services (in some councils) contracted out e.g. stray dogs, contaminated land.	**Two separate in-house teams** but with some specialist functions shared e.g. contaminated land.	**High**	**Medium**	**N/A**	**High**
Discussed under Public Protection	**Emergency Planning** *Discussed briefly under Public Protection but was not a detailed discussion – Ratings therefore may need to be refined*	**In-House across all councils currently**	**Two separate in-house teams with opportunity for joint working**	**Low**	**Low**	**Low**	**Low**
Joint Officers meeting	**Revenue & Benefits**	**In-House** Cotswold and FoD via Publica	**Two separate in-house teams Consider merging customer services**	**High**	**High**	**N/A**	**Medium**
Joint Officers Template	**Cemetery and Crematoria**	**In – House** across all 7 councils	**Two separate in-house team**	**Medium**	**Medium**	**N/A**	**Medium**
Joint Officers meeting	**Housing Strategy, Maintenance & Homelessness**	Mixed - All councils have some elements in-house but note: Stroud and Chelt have in-house DLOs and their own housing stock. FoD and Cotswold have shared housing staff in Publica (shared with West Oxfordshire too) Glos City host the Strategic Housing Partnership which is countywide across all 7 councils. All councils commission some services externally	**Hybrid -** Each UA would operate some services in-house and some under shared arrangements (hosted by one authority) *Unanimous consensus that Corporate Landlord services would be retained within each UA (not a shared service)*	**High**	**High**	**Medium**	**High**
Joint Officers meeting	**Economy & Sustainability -** *Climate & Sustainability*	In-House teams in each council but there is also a county-wide Climate Leadership Gloucestershire Team managed by Glos City. o be updated on 31.07.25	**Two in-house teams, with a shared partnership forum for collaboration**	**High**	**Medium**	**Low**	**Low**

Front-Line Lower Tier Services | Summary (2 of 3)

			2UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Economy & Sustainability -** *Economic Development*	All councils have in-house ED capabilities noting variations in terms of scope of services, structures and extent of partnership working	**Two in-house teams but with countywide partnership working (where needed)**	**High**	**Medium**	**N/A**	**High**
Joint Officers meeting	**Economy & Sustainability -** *Tourism & Visitor Economy*	All Councils have small in-house local tourism teams, but they are all also part of (and put varying amounts of funding towards) the Cotswolds Plus Local Visitor Economy Partnership (LVEP).	**Strategic Countywide Visitor Economy Function with Local Place Marketing** *Not yet been determined if the strategic element would be in-house or as a separate organisation*	**Low**	**Low**	**N/A**	**High**
Joint Officers meeting	**Leisure**	Stroud - **In-House model** **5 of the 6 councils outsource provision** *(3 to Freedom Leisure; CBC to the Chelt Trust and Tewkesbury to Places Leisure)*	**Harmonisation of current contractual positions over time to move to a sustainable and aligned model**	**High**	**Medium**	**N/A**	**Medium**
Joint Officers meeting	**Culture & Heritage**	**Mixed** A number of councils have this in-house; Cotswold outsource running of museum to Freedom Leisure; A lot of partnership working e.g. Glos City have a strategic partnership with Gloucester Culture Trust	**Codesigned future delivery models with the sector and communities with a consideration of future implications related to devolution**	TBD based on delivery models that are chosen	TBD based on delivery models that are chosen	TBD based on delivery models that are chosen	TBD based on delivery models that are chosen
Joint Officers meeting	**Planning & Building Control**	**Planning:** In-house	**Two separate in house teams both same as 1UA model - recognising SDS**	**High**	**Medium**	**Medium**	**Medium**
		Building Control: **Mixed -** Some in-house and some with shared arrangements e.g. - Gloucester City and Stroud partnership / Cheltenham and Tewkesbury	**Delivered as a shared service across both UAs, with joint governance, shared systems, and local operational teams**	**Medium**	**Medium**	**N/A**	**Medium**

Front-Line Lower Tier Services | Summary (3 of 3)

			2UA				
Engmnt to date	**Service Area**	**Current delivery model**	**Recommended Delivery Model**	**Level of change required**	**One off Transition Costs**	**Additional ongoing recurring costs**	**Aggregation Benefits**
Joint Officers meeting	**Development & Regeneration**	In house	**Two separate in house teams**	**Medium**	**Medium**	**N/A**	**Medium**
Joint Officers meeting	**Waste & Environmental Services (Incl. Ubico)**	**Waste Disposal and HRCs:** **Mixed Delivery -** Through in house teams and contractors such as Ubico and FCC (Javelin Park)	**Managed county wide by Ubico.** **Commissioned by two UA's Disposal**: In-House Strategic Service, and Disposal Authority Role for the new UA **HRCs:** Ubico continue to manage HRC Operations **FCC:** West would provide due to Javlin Park location	**Low**	**Low**	**N/A**	**Medium**
		Waste Collection: **Delivered via Ubico**	**Remains delivered by Ubico**	**Low**	**Low**	**N/A**	**Low –** *Consistency and standardisation*
		Environmental Services - Mixed Delivery - in house team with some elements contracted out, some delivered by Ubico e.g. tree planting	**Two separate in-house teams**	**Medium**	**Medium**	**N/A**	**Medium**
Joint Officers Template	**Parking**	**Mixed.** Most services are delivered in-house by district councils though Publica provides services for Forest of Dean and Cotswold with some local differences. . All enforcement activities at GCC are outsourced	**Two separate in-house teams** for management and notice processing. Outsource physical enforcement	**High**	**Medium**	**Low**	**Medium**

Appendix 7: Equalities Impact Assessment (2UA)

The Equality Act 2010 introduced the Public Sector Equality Duty which states that a public authority must, in the exercise of its functions, have due regard to the need to:

1. Eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

This document demonstrates how the Council is meeting the Public Sector Equality Duty by setting out the findings of an equality analysis that has been undertaken in relation to a proposed change to assess whether it has a disproportionate impact on people who share a protected characteristic. The Council's Equality Impact Assessment (EqIA) process covers additional groups not 'protected' by section149 of the Equality Act 2010, including care leavers and care experienced adults.

Background

Title of the proposed change being assessed i.e. the policy, service or other development	Local Government Reorganisation

Describe the purpose of the proposed change and the intended outcomes
This Equalities Impact Assessment (EqIA) has been developed to support the consideration of proposals to restructure local government in Gloucestershire, assessing both the single unitary authority (1UA) and two unitary authorities (2UA) options. This document focuses on the 2UA option only, the proposed makeup of which is set out in Table 8 below and involves creating two unitary authorities based on an East/West split of the county. Each unitary authority would be based on the footprint of three district councils:

Table 8: Structure and 2023 Population of Option 2[65]

East		West	
Cheltenham	120,255	Forest of Dean	89,104
Cotswold	91,490	Gloucester	134,991
Tewkesbury	98,896	Stroud	124,540
East Total	310,641	West Total	348,635
% of Gloucestershire population	47.1%	% of Gloucestershire population	52.9%

[65] *Ibid.*

The purpose of this assessment is to understand and evaluate the potential impacts of these changes on all service users and council staff with protected characteristics.

The reorganisation of local government is a significant change that could affect how services are delivered, how decisions are made, and how residents engage with their local councils.

This assessment aims to:

- Identify any potential positive or negative impacts on service users with protected characteristics
- Consider how these impacts might differ between the one-unitary and two-unitary models
- Highlight opportunities to promote equality and mitigate any adverse effects

It is intended for this EqIA to be a live document, updated as proposals are refined and further engagement with stakeholders takes place. Additionally, after a decision has been made by Government on the chosen model for Gloucestershire, to inform implementation.

Who is affected by the proposals?

Service users:	Yes
Wider community:	Yes
Workforce:	Yes
Other (please specify):	

Decision to be taken and decision maker	The decision under consideration is whether the local government structure in Gloucestershire is replaced by either: • A single unitary authority; or • Two unitary authorities (East / West) This decision will significantly impact how local services are delivered, how residents engage with local government, and how resources are allocated across the county. Although the ultimate decision will be made by Government, councils in Gloucestershire are able to make a local decision on their preferred model to present to Government.

Information and Data Collection

Summarise how you have collected the information and data required to assess the current situation (section 3.1 below) and the potential or actual impact of the proposed change (section 3.2 below) on those who share the protected characteristics and the additional groups (e.g. survey of services users, running community focus groups, analysing service usage data, engaging with staff networks). The actual information and data should be set out in Appendix 1 (Service Users) and Appendix 2 (district & county staff in Gloucestershire).

If there are any gaps, include an action in section 4 to fill these. This does not mean that you cannot complete the equality impact assessment, but you need to follow-up the action and revisit as part of the monitoring and review arrangements set out in section 5.

Stakeholders	Engagement and Consultation	Other Sources
Service Users / Wider Community	Workshops with services across the county council and district councils to understand the risks and opportunities associated with aggregation and disaggregation of each service. A public local engagement process has also been undertaken across Gloucestershire, designed and delivered by an independent, external engagement company - Cratus. The engagement process includes an online survey with both structured and open-ended questions, a dedicated microsite, 12 in-person events (two per district), and two online webinars. A total of 3,112 survey responses were received.	Outputs of disaggregation / aggregation service workshops. Cratus engagement report.

Workforce	A workforce pulse survey has been undertaken across all councils. Top line outputs from the survey are: top lines from the survey which you can see below: • 86% of staff understand what LGR might mean in Gloucestershire • 82% of staff understand what devolution might mean for Gloucestershire • 63% understand the difference between LGR / devo • 75% of staff think messages are being well communicated. • Email and staff briefings are the most popular ways staff like to hear messages about LGR/devo • 46% of staff don't feel confident their views will be listened to • 78% feel confident to ask questions • 69% have felt no impact on morale • 78% feel supported by leadership and management • 90% feel they can discuss with their line manager	Staff engagement outputs from the pulse survey on LGR and Devolution across the seven councils in Gloucestershire
Partners	To support the wider local engagement being delivered across Gloucestershire to inform the development of Local Government Reorganisation (LGR) proposals,	

	Gloucestershire County Council's (GCC) senior leadership conducted meetings with key stakeholders, with whom they had established relationships, across June – August 2025. The meetings addressed the following, with some stakeholders choosing to provide further feedback via email or letter: • Update stakeholders on how LGR Full Proposals and Devolution discussions are progressing in Gloucestershire. • Update stakeholders on the LGR policy position of GCC's new Cabinet to be agnostic and evidence-led in considering both a one unitary and two unitary model. • Provide information on the timetable and key processes underway. • Understand more about how LGR / Devolution could impact specific stakeholders / organisations, what is important to them in relation to this topic and address any concerns or issues for them. • Gauge interest in further collaboration and engagement (as appropriate). Stakeholders engaged includes: • Various members of the business community	

	• Gloucestershire Society of Local Council Clerks (SLCC) • Gloucestershire VCSE Alliance • Gloucestershire Rural Community Council (GRCC) • The Bishop of Gloucester, joined by senior Clergy including Deans of the Diocese. • Gloucestershire's schools associations • Gloucestershire College • Hartpury University • National Star College • SG & Stroud College • Bromford Housing • Adults Collaborative Board • Gloucestershire Care Providers Association	
Other		

Equality Assessment

Indicate the impact on each group and explain how you have reached your conclusions (i.e. through analysis of the information and data that was collected through the engagement, consultation and other sources / methods that were set out in section 2).

Consider sub-categories (e.g. different kinds of disabilities) and how the groups are interconnected (e.g. young women) resulting in particular needs or types of disadvantage and discrimination (sometimes known as intersectional or combined discrimination).

The Proposed Change

Summarise your assessment of the likely or actual impact of the proposed change on each of the groups. If an action is required, this should be recorded in Section 4.

Service Users						
Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
Age				X	There are some general risks posed by service disaggregation on groups of older adults and children who receive social care support. With the West area having greater overall Adult Social Care demand than the East. Gloucestershire has an ageing population. Demographics are projecting a dependency ratio of 0.69 by 2047. An increase from 0.65 in 2022. With the East being projected to have a greater dependency ratio than the West and Gloucestershire as a whole. For every 100 people the East will be supporting around 5 more dependents than the West, which could translate to higher demands on council services under a 2UA model, and more people who are not in the workforce than those who are working, potentially constraining growth in the local economy.	Y

					The West has a higher population of children than the East. The West also has a higher level of child safeguarding activity, and a greater rate of children subject to Education, Health and Care Plans. Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	
Detailed summary of Impact	Potential disproportionate impact: There is potential for impact to services dependant on the ways of working and delivery models that are agreed under the new authorities. Further analysis is needed once delivery models are agreed to review impacts to commissioned services for children and young people if commissioned services are disaggregated and commissioning power reduced. Examples include: School places planning, SEND, early years, education, children's specialist placements, some public health services, e.g. public health nursing, sexual health.					
Disability			X		It is considered that there is potential for a disproportionate impact on service users with a disability under a 2UA model. • The West has the highest proportion of residents with a disability (17.7%) exceeding the figure for the county as a whole and the	Y

					national average. The East area has the lowest proportion of residents with a disability (15.8%) below the county and national average. Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	
Detailed summary of Impact	Potential disproportionate impact: • With a higher proportion of residents with a disability in the West, there is a risk that services will lose the joined up approach across the new boundaries and commissioning power will be reduced. Opportunities to share and learn about the best accessibility approaches may be limited by the creation of two authorities. As part of implementation planning, further analysis will be undertaken to ensure appropriate mitigants are considered. For example: delivery of highways issues including local transport, adult social care services, planning implications for schools, commissioned services etc. • Potential negative impact on delivery of services for Special Educational Needs and Disabilities (SEND) services, as SEND inclusion support is based on the setting the child attends, and early years support is based on where the child lives. Consideration needs to be given for access to specialist provision. • Demographics suggest a 2UA option would result in higher numbers of children requiring additional support, SEND and Education, Health and Care Plans (EHCPs) in the West, resulting in higher costs and greater deficit. • As implementation plans are agreed, consideration will need to be given to service user networks to understand their needs. Such as parent-carer forums and children and young people voice.					

	Potential positive proportionate impact: • A model covering a smaller geographical area might be able to be more responsive to local needs and may therefore be able to respond to specific needs and requirements of residents with disabilities.					
Sex				X	Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	Y
Race				X	Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	Y
Gender reassignment				X	Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to	Y

					consider the potential equalities impact on service users.	
Pregnancy & maternity				X	Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	Y
Religion and/or belief				X	Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	Y
Sexual orientation				X	Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	Y

Marriage & civil partnership				X	Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	Y
Armed Forces community				X	Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	Y
Carers				X	Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	Y
Detailed Summary of Impact	• Parent-carer forums and networks are established as county-wide, so disaggregation could impact support					

Care leavers / care experienced adults			X		Under a 2UA delivery model there is potential for disproportionately negative impact on service users where commissioning power and existing services would be reduced. Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	Y
Detailed Summary of Impact	Potential disproportionate impact • Potential impact on breadth of commissioned services for care leavers if commissioned services are disaggregated and commissioning power reduced. • Children's services often commission supported living in Gloucester (West) due to wealth of wider support services. As a result, a greater number of Care Leaver Accommodation Based Support services are situated in Gloucester so redistribution of services might be needed to respond to changes in CYP models over time. • Unequal split of current supported accommodation provision across East and West. • There is a risk that service provision across each authority is not equal, therefore creating a postcode lottery of service across the East and West boundaries.					
Digital exclusion				X	Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to	Y

					consider the potential equalities impact on service users.	
Geography, for example, urban and rural areas				X	There is a risk of disproportionate impacts on service users with key geographical characteristics under a 2UA model, where location of existing services may change. Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	Y
Detailed Summary of Impact	Potential disproportionate impact: ▪ Impact on tenant farmers with potential change in T&Cs with new authority e.g. rent increases. ▪ Local Transport plan would be divided creating a less strategic approach ▪ Service users may experience reduced access to library services in each unitary ▪ Where services have District hubs, main HQ is often Gloucester (West), so some consideration needed by providers of property requirements. ▪ Travellers' sites are all located in the East. ▪ Provision of SEND services in rural areas: in smaller delivery units (2UA) there may be less resilience to support current arrangements. ▪ Reablement units, discharge services, and in-house facilities rely on shared access to county-owned or managed property assets currently ▪ Hospital discharge is a key area of concern in the context of LGR -. Gloucester Royal (located in the West) is the central acute hospital, and pathways are currently managed at county scale. LGR options need to consider how discharge responsibilities continue to be managed to					

	minimise clinical and operational risk. The countywide discharge-to-assess model, which provides short-term bedded care for assessment (Pathway 2), often leads to placements that become individuals' long-term homes. Introducing a requirement to source placements based on the boundaries of two separate unitary authorities, depending on ordinary residence, could reduce placement options and delay discharge processes. ▪ Adult Social Care is facing sharply rising demand, especially from older people and working-age adults with complex needs. West Gloucestershire carries a higher baseline demand and projected growth, particularly in supported living and long-term placements. ▪ Imbalance in demand between East and West - A 2UA model could potentially fragment delivery and reduce the ability to achieve consistent outcomes for residents as demand and supply patterns differ significantly across the county, and a split could exacerbate inequalities rather than resolve them. ▪ Disruption for the most vulnerable residents (Ordinary Residence) - The challenge around 'Ordinary Residence' is not only operationally / financially complex but impacts the most vulnerable residents if there are implications in terms of moving people across the county, specifically those with long-standing placements. ▪ Income deprivation is typically higher in more urban areas; and the West has higher deprivation compared to the East. Deprivation is a key determinant of health outcomes, and the differing health profiles and needs of the 2UAs need to be considered in assessing impact. ▪ Public health services are typically commissioned on a countywide footprint, with locality provision based on population need. Consideration will need to be given to how services are disaggregated in a 2UA model, and risk of a reduction in the breadth and scale of provision which can be afforded/supported across urban and rural communities if commissioned on a smaller geographic footprint.					
Socio-economic disadvantage				X	Under a 2UA model the risk to those with Socio-economic disadvantage characteristics is access routes to services. Both physically, depending on where a service is offered, and for referral routes.	Y

					Deprivation levels within the West Unitary will be higher than the deprivation levels within the East. Meaning that public health grants would be smaller for the East. There is concern that the grant would not be proportionate and the East could therefore be disadvantaged overall. There is also a potential impact of service delivery where additional roles may be needed under a 2UA model in services that are already encountering recruitment challenges. Socio-economic disadvantage is a key determinant of health outcomes, and the differing population and health profiles of the 2UAs will need to be considered when assessing impact on service users. Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to consider the potential equalities impact on service users.	
Potential disproportionate impact:						

• The disaggregation of county-wide services (e.g. transport subsidies, or digital inclusion programmes) could reduce access or make service more expensive per resident. • Local Transport plan would be divided creating a less strategic approach • Given higher deprivation levels in West than East, West allocation of the public health grant is likely to be greater than East. Currently, in West there are 37,422 people living in the national 20% most deprived LSOAs in England, in the East this is just 13,900 people. Smaller budgets may impact on the scale and breadth of public health services which can be commissioned and staff capacity, potentially leading to differential service provision across the 2UAs. • Children and education service delivery could be impacted if a 2UA arrangement exacerbates recruitment challenges through increased competition for hard to fill posts, such as social work, Educational Psychology and Special Advisory Teachers, or other recruitment such as foster carers. Potential positive proportionate impact: • With smaller authorities there is potential that planning and procuring services can focus more on creating local jobs, training opportunities, and helping the local economy grow. • There is also the potential that more localised services would mean a possible reduction in travel costs associated and reduced distances being travelled by residents. • There is potential for more localised provision of public health services and neighbourhood/locality-based delivery aligned with population needs.						
Vulnerable groups of society			X		The potential for disproportionate impact here is based on the data where there are higher rates of vulnerable people in the West than the East. Consideration will be needed to mitigate risks of disaggregation to services under a 2UA model. As delivery models are developed and agreed, further consideration will be needed to	

					consider the potential equalities impact on service users.	

Potential disproportionate impact:

- Need to ensure continuity of provision through transition, notably for vulnerable, high-risk populations. Experience would suggest that we would likely see an adverse impact on service outcomes and team productivity through transition.
- Higher rate of co-morbidities and long-term conditions in the West than in the East. This makes the population more vulnerable to poor health outcomes, such as the impact of a pandemic (as observed during and following Covid 19).
- Distribution of inclusion health groups differs across East and West which needs to be considered in assessing impacts.
- Asylum accommodation predominantly located in West.
- Refugee population higher in East.
- Traveller accommodation all located in East.
- Homelessness/rough sleeper - predominantly in West.
- Care leavers – predominantly in West
- Two hospital discharge teams could result in reduction in service for effective support of hospital discharges

Council Workforce

Moving to Two Unitary Authorities (2UA) will bring changes to how we work and how teams are set up. Further assessment is needed to understand how these changes will affect different groups of staff across the councils.

Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
Age				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Considerations for disproportionate impacts: • As the biggest age demographic for staff falls within the 45-59 age range, consideration will need to be given to this group • When jobs are reorganised or changed, there's a risk that older people might be treated unfairly in hiring. HR will need to take steps to prevent this. • There's a risk that HR policies and practices might not be consistent across councils that will be making up the new authorities. Potential for positive impact: • As roles change and teams are reorganised, younger staff might have more opportunities for promotion.	Y

					• The new councils could create policies that support staff of all ages, including training and flexible retirement options. • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Disability				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Considerations for disproportionate impacts: • Staff with disabilities might be more affected by changes in location, especially if transport or building access isn't properly planned. • When the new councils are created, there may be delays or gaps in providing workplace adjustments (like special equipment, flexible hours, or software) during team or office moves.	Y

					• Where services may be split up, there is a risk of losing important knowledge and support networks (like disability staff groups or equality officers) if these aren't kept in place in the new councils. • Changes to how people work or being moved to a new employer (TUPE) may disproportionately affect staff with mental health needs or neurodiverse conditions. Potential for positive impact: • The new councils have a chance to build accessible workplaces, systems, and flexible working options from the start. • The opportunity to ensure that the councils create stronger inclusion policies, which could lead to better support and visibility for staff with hidden disabilities or mental health conditions. • As part of implementation, efforts will be made to make sure staff policies around workplace adjustments are in place and that workspaces are accessible. However, the exact impact may vary between services, and a more detailed review will be needed. • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs.	

					As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Sex				X	Based on the different needs of the current workforce, below highlights some general points for consideration: As with other personal characteristics, the impact of changes will vary depending on the makeup of each team. However, changes that affect frontline staff and team leaders are likely to affect women more, where they make up a large part of these roles. It will be important to consider this when planning any potential staff restructures linked to LGR. Considerations for disproportionate impacts: • There's a higher risk of women being affected unfairly, as they make up over 70% of the workforce. Consideration should be given when affecting any contractual changes to ensure individuals are not disproportionately affected due to sex. • There is a risk that pay structures do not provide equity for those of any sex.	Y

					Potential for positive impact: • The new councils could use this to improve gender balance, especially in leadership, management, and technical roles. • There is an opportunity to ensure there are equal pay policies and structures • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Race				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Like with other personal characteristics, the impact of changes will vary depending on the makeup of each team or service. However, there is risk that staff from ethnic minority backgrounds are impacted: Considerations for disproportionate impacts:	Y

					• There's a risk that anti-racism work or equality efforts might lose focus if teams are split or priorities shift. • Communication could be harder during the transition, especially for staff who don't speak English as their first language. Potential for positive impact: • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Gender reassignment				X	Based on the different needs of the current workforce, below highlights some general points for consideration: There is no data available on staff who declare that they are going through or have gone through gender reassignment. Consideration will be needed to ensure there are no disproportionate impacts on staff with this characteristic.	Y

					Considerations for disproportionate impacts: • There's a risk that HR policies and practices might not be consistent across councils that will be making up the new authorities. For example, how names and pronouns are recorded, dress codes, or access to support. • Some councils may have different policies that will need to be aligned during the TUPE process. Potential for positive impact: • Setting up the new councils is a chance to improve support for trans staff. This could include better training, updated policies on gender identity, and more inclusive facilities. As with other areas, work will be done to make sure staff policies are consistent. • Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Pregnancy & maternity				X	Based on the different needs of the current workforce, below highlights some general points for consideration:	Y

					Considerations for disproportionate impacts: • Staff on maternity leave during the transition might feel concern about job security, changes in their manager, or changes to their role. • Through this process, working hours or locations might change. This could be difficult for pregnant staff or new mothers, especially if it's different from what they agreed before going on maternity leave. • As the new councils are set up, there could be problems with managing leave, pay, or flexible working during the change. • There is a risk that HR policies and practices and not consistent across councils that will be making up the new authority. There will be a need to harmonise HR policies. Potential for positive impact: • On the positive side, the new councils might be able to plan their workforce in a more local and flexible way. • This could lead to better support for returning to work, more flexible working options, and improved arrangements for staff with caring responsibilities. • As implementation plans are agreed there will be more opportunity to work with	

					employee groups to understand their needs – such as physical space for breastfeeding As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Religion and/or belief				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Like with other personal characteristics, the impact will vary depending on the makeup of each team. Consideration will be needed to ensure there are no disproportionate impacts on staff with this characteristic. Considerations for disproportionate impacts: • There's a risk that religious needs might be missed during potential office moves or when new policies are created. For example, staff may need prayer rooms or multi-faith spaces if they're asked to work in a new location. • There is a risk that HR policies and practices are not consistent across councils that will be making up the unitary authority.	Y

					There will be a need to harmonise HR policies. Potential for positive impact: • Any changes to office spaces as part of creating the new councils should be a chance to design more inclusive workplaces. This might include multi-faith rooms, culturally appropriate food options, or more flexible leave policies. • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Sexual orientation				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Like with other personal characteristics, staff don't have to share their sexual orientation, so data is limited on this characteristic. As implementation plans are agreed there will be	Y

					more opportunity to work with employee groups, such as LGBTQ+ groups to understand their needs. Considerations for disproportionate impacts: • There's a risk that existing LGBTQ+ support networks or allies could be lost if teams are split up or moved. Potential for positive impact: • The new councils should show strong support for LGBTQ+ inclusion from the start by creating new networks, policies, and support systems for LGBTQ+ staff. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Marriage & civil partnership				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected.	Y

					As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Armed Forces community				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected. Considerations for disproportionate impacts: • There is a risk that HR policies and practices are not consistent across councils that will be making up the unitary authority. There will be a need to harmonise HR policies. Potential for positive impact:	Y

					• As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Carers				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Like with other personal circumstances, the impact on staff with caring responsibilities will need to be considered in more detail once detailed plans are developed. Workplace policies may need to be updated to support carers, including options for leave and flexible or hybrid working. Considerations for disproportionate impacts: • Staff who care for others may feel additional pressures if they're worried about job security or increased workloads.	Y

					• There is potential for loss of informal support, like understanding managers or flexible arrangements, during team changes. • Moving to a new work location, if required could mean longer travel times and higher costs, making it harder to manage their caring duties. • There is a risk that HR policies and practices are not consistent across the councils that will be making up the unitary authority. There will be a need to harmonise HR policies. Potential for positive impact: • The new councils could use this opportunity to improve support for carers by creating fair and consistent policies. For example, carers' leave and flexible working— across all areas. • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent.	

					Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Care leavers / care experienced adults				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected. As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	Y
Digital exclusion				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to	Y

					ensure people with this characteristic are not disproportionately affected. As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Geography, for example, urban and rural areas				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected. As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent.	Y

					Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Socio-economic disadvantage				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected. Considerations for disproportionate impacts: • Staff on lower incomes may struggle more with potential changes with moving to a new location, longer travel, or job uncertainty. • If there are redundancies or changes in pay, those already financially stretched could be disproportionately affected. However, based on the experiences of other local authorities who have already gone through this process, redundancies have been minimal and mostly limited to senior leadership roles (such as Chief Executives, Directors etc). Potential for positive impact:	Y

					• The reorganisation and TUPE process should be used to reduce inequalities - for example, by improving access to training, career progression, or digital tools. • As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs. As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	
Vulnerable groups of society				X	Based on the different needs of the current workforce, below highlights some general points for consideration: Consideration will be needed for any changes to or new internal policies and practices to ensure people with this characteristic are not disproportionately affected. As implementation plans are agreed there will be more opportunity to work with employee groups to understand their needs.	Y

					As with other areas, work will be done to make sure staff policies are consistent. Further analysis is needed once delivery model is agreed to assess any potential equalities impact on the workforce.	

Action Plan

Set out the key actions that will be undertaken, following the equality assessment in section 3, to further maximise the positive impact or mitigate the negative impact of the proposal on the protected characteristics and additional groups prior to implementation (any negative consequences should be eliminated, minimised or counter-balanced by other measures):

Identified Potential or Actual Impact	Recommended Action(s)	Owner	Target Completion Date
Further analysis is needed once delivery model is agreed to assess any potential equalities impact on service users and workforce.	As part of implementation planning, each LGR programme will need to complete an EqIA to consider the impact of proposed changes to service delivery and ways of working on those with protected characteristics and inform decision making.	Programme Managers	Nov ’25 - Aug ‘26
Depending on the implementation plan chosen, there is potential for equalities		People & Culture LGR Workstream	Nov ’25 – Apr ‘28

impact on workforce with protected characteristics. Mostly likely to be Geography and disability, should any change in working location be needed	People & Culture workstream to ensure all workforce risks are mitigated against through policy.		

Monitoring and Review

Public bodies must have regard to the aims of the duty not only when a policy, service or development is being created and decided upon, but also when it is implemented and at regular intervals thereafter. The Equality Duty is a continuing duty.

Lead officer(s):	Gareth Edmundson, Chief Executive – Cheltenham Borough Council Jane Portman, Chief Executive, Cotswold District Council Nigel Brinn, Chief Executive, Forest of Dean District Council Jon McGinty, Managing Director, Gloucester City Council Jo Walker, Chief Executive – Gloucestershire County Council Kathy O'Leary, Chief Executive – Stroud District Council Alistair Cunningham, Chief Executive – Tewkesbury Borough Council

Part 1 – Initial arrangements (up to around six months following implementation)

Date of the post implementation review:	October 2028
Approach to measuring the impact of the change to enable a comparison between	Review on implementation to be completed by each LGR Programme as agreed under finalised implementation plans. Each programme will need an individual EqIA

the anticipated impact (as set out in section 3) with the actual impact: ▪ What mechanisms will be used? ▪ How will service users / the wider community / GCC staff and other stakeholders be involved?	to ensure there is consideration of equalities and ownership of actions throughout the process.

Part 2 – Ongoing arrangements (from around six months onwards)

Frequency of monitoring and review:	Ongoing monitoring via individual LGR programmes.
What mechanisms will be used? How will service users / the wider community / GCC staff and other stakeholders be involved?	Via individual programme EqIAs.

Appendix 1: Service User Data and Information

Details of service users affected by the proposed activity:

Groups	Service User Data and Information

Age

Dependency ratios are a measure that indicate the level of support that needs to be provided by the working age (16-64) population to the younger and older population, people aged 0-15 or 65+. A low dependency ratio indicates that there is a sufficient ratio of the working-age population to the dependent population. In contrast, a high dependency ratio indicates there may be more financial burden on the working population to support the dependent population

The West has a higher overall population than the East, it has a slightly lower proportion of those aged 65 and over, which are likely to require more targeted support.

Table 5: Age distribution of the mid 2023 Population, by the proposed unitaries[1]

	Gloucestershire		East		West	
	Number	%	Number	%	Number	
Total Population	659,276	100.0%	310,641	100.0%	348,635	
0-16	115,485	17.5%	53,920	17.4%	61,565	
16-64	398,322	60.4%	186,241	60.0%	212,081	
65+	145,469	22.1%	70,480	22.7%	74,989	

Table 8 shows the projected dependency in 2047. The East area is projected to have a greater dependency ratio than the West and Gloucestershire as a whole. For every 100 people of working age the East will be supporting around 5 more dependents than the West, which could translate to higher demands for council services, and more people who are not in the workforce than those who are working, potentially constraining growth in the local economy.

Table 8: Projected dependency ratio, 2047, by the proposed unitaries[2]

	Dependency ratio
Gloucestershire	0.69
East	0.72

West	0.67

Figure 2 looks at the projected population across the three areas in more detail, breaking it down by sex and 5 year age band. Across all areas the largest 5 year cohort is those aged 55-59. All areas have a similar age profile, although the West area has a higher proportion of those aged 35-59, and a lower proportion of older people than other areas.

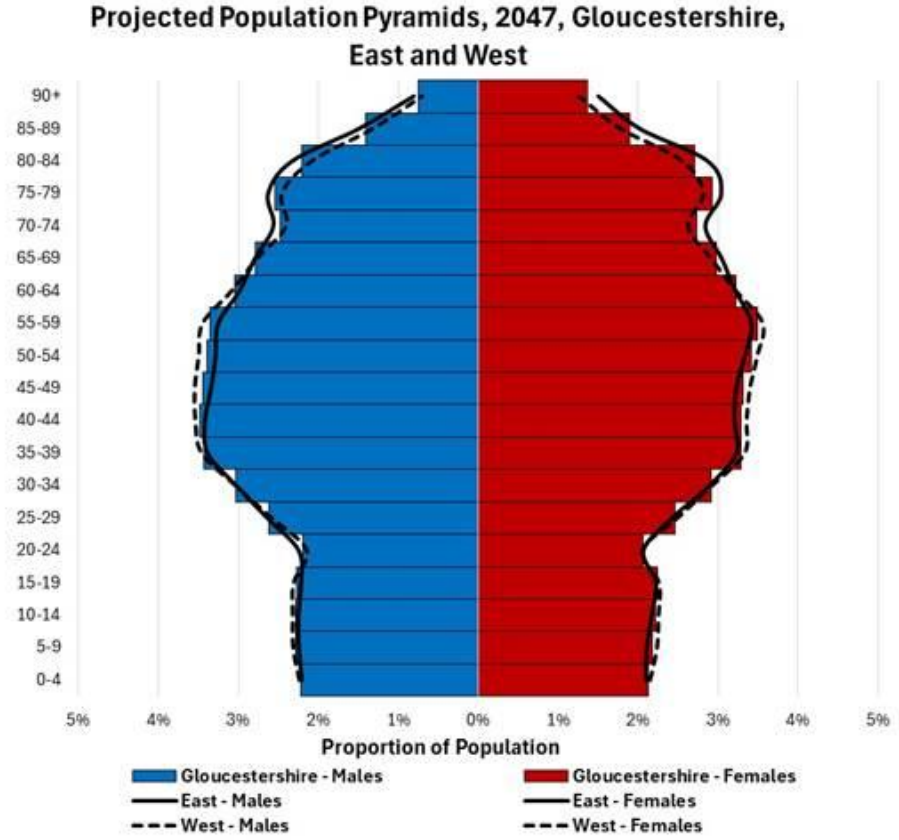


Figure 2: Projected Population Pyramids, 2047, Gloucestershire, East and West[3]

Adult Social Care

The information below shows a break down of the Adult Social Care case cohort by age groups, Gloucestershire, East and West areas and the component districts.

Table 9 shows the caseload for age groups over 75 are the highest across all areas. The West area has greater overall demand than the East.

Table 9: Adult Social Care Service Users by age, Gloucestershire, East and West, as at 31st March 2025 (DRAFT)[4] [5]

East Unitary

	Under 18	18 - 24	25 - 34	35 - 44	45 - 54	55 - 64	65 - 74	75 - 84	85+	Grand Total
Cheltenham	0	56	80	99	81	167	165	319	328	1271
Cotswold	0	16	25	22	28	69	99	217	307	770
Tewkesbury	0	40	57	44	44	119	99	203	239	836
****	**0**	**112**	**162**	**165**	**153**	**355**	**363**	**739**	**874**	**2877**

West Unitary

	Under 18	18 - 24	25 - 34	35 - 44	45 - 54	55 - 64	65 - 74	75 - 84	85+	Grand Total
Gloucester	<5	159	190	156	179	302	220	371	333	1865
Stroud	<5	82	101	79	87	187	164	294	340	1313
Forest of Dean	0	65	87	72	73	157	156	257	278	1113
****	**0**	**306**	**378**	**307**	**339**	**646**	**540**	**922**	**951**	**4291**

Countywide

	Under 18	18 - 24	25 - 34	35 - 44	45 - 54	55 - 64	65 - 74	75 - 84	85+	Grand Total
Cheltenham		56	80	99	81	167	165	319	328	1271
Cotswold		16	25	22	28	69	99	217	307	770
Tewkesbury		40	57	44	44	119	99	203	239	836
Gloucester	<5	159	190	156	179	302	220	371	333	1865
Stroud	<5	82	101	79	87	187	164	294	340	1313
Forest of Dean		65	87	72	73	157	156	257	278	1113
Out of County or Unknown	<5	18	24	50	54	60	42	55	49	349
Grand Total	**7**	**425**	**559**	**512**	**533**	**1042**	**939**	**1710**	**1871**	**7433**

Vulnerable Children

The information below shows a break down of the vulnerable children across Gloucestershire, East and West areas and the component districts.

The West has a higher population of children than the East. The West also has a higher level of child safeguarding activity, and a greater rate of children subject to Education, Health and Care Plans.

Table 10: Service demand for children's services as at 09/07/2025[6]

	Population aged 17 and under (MYE 2023)	All open referrals/cases[7]	CiN / CP / CIC[8]	CYP with EHCP[9] [10]

Area	Number	Number	%	Number	%	Number	%
Cheltenham	23,777	662	2.80%	333	1.40%	1,106	4.70%
Cotswolds	16,623	419	2.50%	270	1.60%	733	4.40%
Tewkesbury	20,515	575	2.80%	346	1.70%	1,235	6.00%
East	60,915	1,656	2.70%	949	1.60%	3,074	5.00%
Forest of Dean	16,192	460	2.80%	301	1.90%	867	5.40%
Gloucester	29,192	1,196	4.10%	617	2.10%	1,708	5.90%
Stroud	24,173	596	2.50%	308	1.30%	1,294	5.40%
West	69,557	2,252	3.20%	1,226	1.80%	3,869	5.60%
Gloucestershire	130,472	3,908	3.00%	2,175	1.70%	6,943	5.30%

[1] Mid 2023 Population Estimate, ONS

[2] *Ibid.*

[3] *Ibid.*

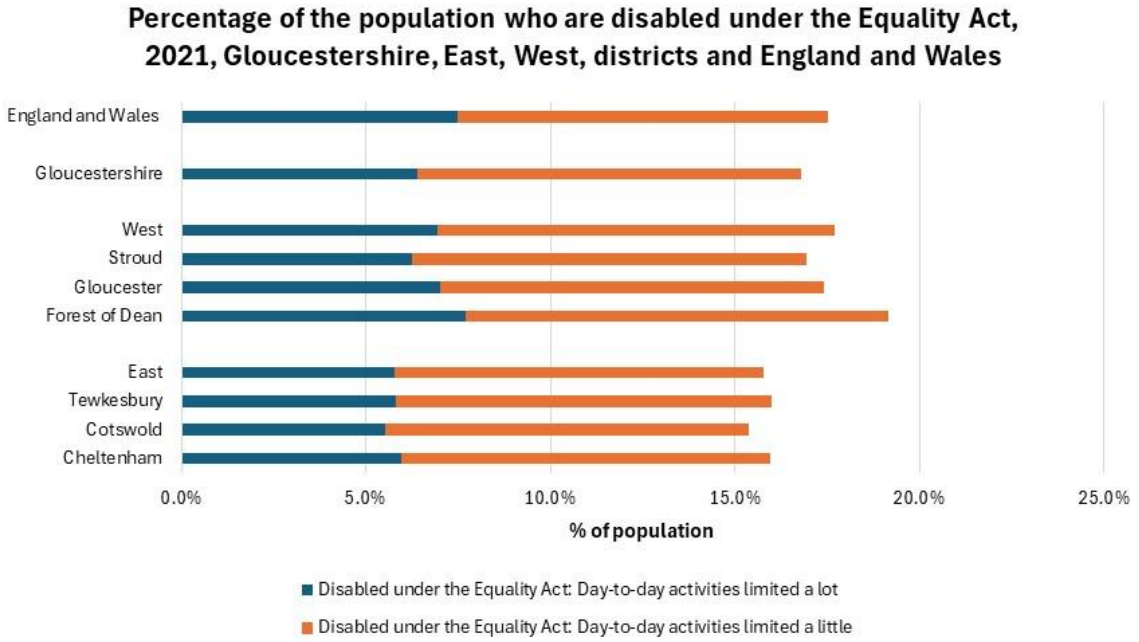
[4] DAIT, GCC

[5] The tables are based on our Client Level Dataset (CLD), representing a distinct count of individuals by age and postcode at the point of service commencement. Please be aware that the CLD is currently undergoing a comprehensive review and enhancement process, which may lead to future refinements in the data. All service types are included in this snapshot—this encompasses Health, Fully-Funded, Part-Funded, and selected Self-Funded services. No services have been excluded.

[6] DAIT, GCC

[7] Figures refer to all open Social Care referrals, as of 09/07/2025. Address information refers to Home Address as of 09/07/2025. Totals may not add up to 100% as either address information not being recorded or child residing outside of Gloucestershire at that time.

[8] Of the above children, those who were either subject to a CiN plan, CP plan or were a Child in Care, as of 09/07/2025

	[9] Figures include children and young people aged 0-25 with an EHCP maintained by the LA and are a snapshot as at 09/07/2025. Based on the child / young person's home postcode. [10] * EHCP runs from 0 to 25, but the majority of plans are for under-18's, so the same population (0 to 17) is used for the % for consistency
Disability	In 2021, 16.8% of Gloucestershire residents were classified as having a disability under the Equality Act. Looking at the East and West areas, the West area has the highest proportion of residents with a disability (17.7%) exceeding the figure for the county as a whole and the national average. The East area has the lowest proportion of residents with a disability (15.8%) below the county and national average. 

Sex

According to the 2023 population estimates, 51.1% of Surrey's population is female. This is in line with the national average. The East and West areas are also broadly similar to the national and county average with 51.2% and 51.0% of the population being female respectively.

Table 13: Sex breakdown of the mid 2023 Population, Gloucestershire, East, West, districts and England and Wales[1]

	Number			Percenta
	Male	Female	Total	Male
Cheltenham	59,011	61,244	120,255	49.1%
Cotswold	43,963	47,527	91,490	48.1%
Tewkesbury	43,698	45,406	89,104	49.0%
East	**146,672**	**154,177**	**300,849**	**48.8%**
Forest of Dean	66,984	68,007	134,991	49.6%
Gloucester	60,868	63,672	124,540	48.9%
Stroud	47,832	51,064	98,896	48.4%
West	**175,684**	**182,743**	**358,427**	**49.0%**
Gloucestershire	**322,356**	**336,920**	**659,276**	**48.9%**
England and Wales	29,835,992	31,018,735	60,854,727	49.0%

As age increases, females outnumber males by an increasing margin. In Gloucestershire in 2023, 52.8% of people aged 65-84 were female, whilst for people aged 85+ the difference was more marked with females accounting for 61.4% of the total population; this difference is observed across the East and West areas as well as at a national level.

Table 14: Sex and breakdown of the mid 2023 Population, Gloucestershire, East, West, districts and England and Wales[2]

	0-15		16-64		65-84		
	Male	Female	Male	Female	Male	Female	Male
East	50.6%	49.4%	49.1%	50.9%	46.8%	53.2%	38.3%
West	50.9%	49.1%	49.7%	50.3%	47.6%	52.4%	38.8%
Gloucestershire	50.8%	49.2%	49.4%	50.6%	47.2%	52.8%	38.6%
England and Wales	51.2%	48.8%	49.3%	50.7%	47.1%	52.9%	38.1%

[1] Mid 2023 Population Estimates, ONS

[2] *Ibid.*

Race

The Equality Act states that race includes colour, nationality, ethnic or national origins. The government refers to ethnicity and not race; this is because surveys usually ask people for their ethnicity and not their race, and using consistent terms helps people to understand the data.

In Gloucestershire 87.7% of residents identified as White English, Welsh, Scottish, Northern Irish or British, which was considerably higher than the national average of 74.4%. The East and West have a similar proportion of residents who identified as White English, Welsh, Scottish, Northern Irish or British to Gloucestershire with 88.1% and 87.4% respectively.

White Other accounts for the second largest proportion of residents in Gloucestershire, East and West. In Gloucestershire 5.3% of residents fall into this category, lower than the national average of 7.3%. In the East area 5.9% of residents are classified as White Other, slightly higher than the Gloucestershire figure but lower than the national figure, while in the West area 4.8% of residents fall into this category, higher than the Gloucestershire and national figure.

The Asian, Asian British and Asian Welsh category made up the largest percentage of the non-White Gloucestershire, East and West population and represented 2.9% of Gloucestershire residents, lower than the national average of 9.3%. The East and West areas have a similar proportion of Asian, Asian British and Asian Welsh as Gloucestershire as 2.6% and 3.1% respectively.

There are minimal differences in the proportion of Black, Black British, Black Welsh, Caribbean or African residents and Mixed or Multiple Ethnic Groups across Gloucestershire, East and West areas.

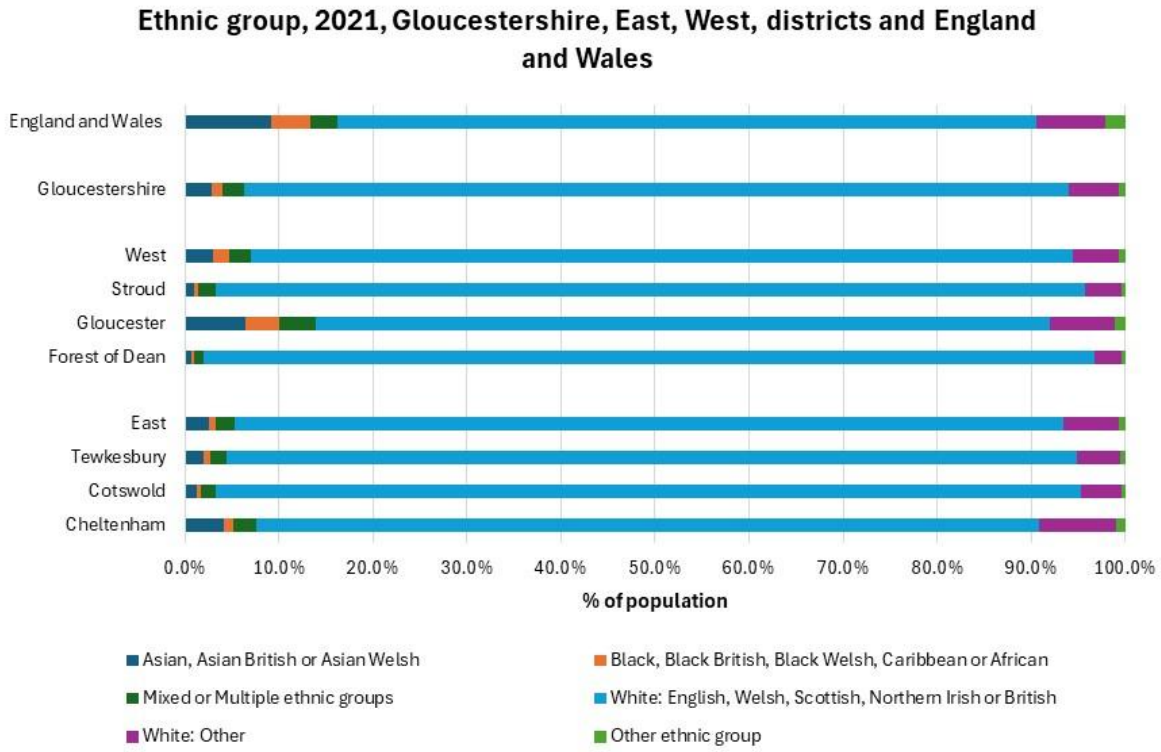
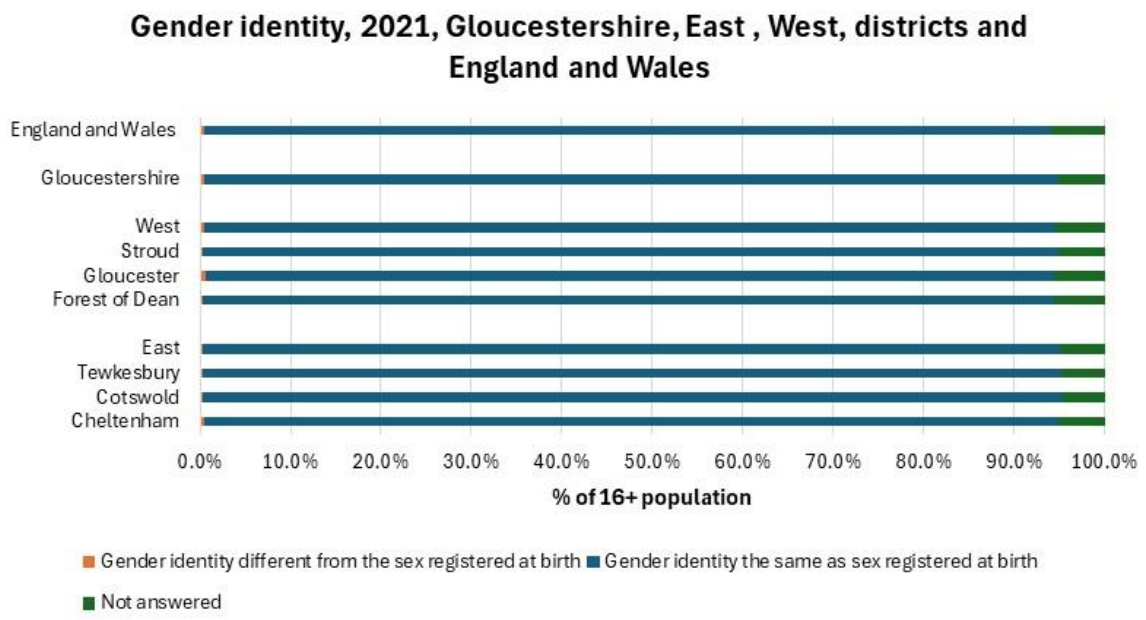


	Figure 6: Ethnic group, 2021, Gloucestershire, East, West, districts and England and Wales[66]
Gender reassignment	The Census 2021 has provided the first set of official data on gender identity in England and Wales. In the 2021 Census there was a new question around gender identity, asking 'is your gender the same as the sex you were registered at birth?'. The question referred to a person's sense of their own gender. It was directed only at people aged 16 and over, and answers were voluntary. However, as of November 2024, the Census 2021 data on gender identity no longer hold the accredited official statistics designation and have been reclassified as official statistics in development. ONS states: There are some patterns in the data that are consistent with, but do not conclusively demonstrate, some respondents not interpreting the question as intended; given other sources of uncertainty, not least the impact of question non-response, we cannot say with certainty whether the census estimates are more likely to be an overestimate or an underestimate of the total number of trans people aged over 16 years in England and Wales. Census estimates on gender identity are, however, broadly consistent with the best available comparator of the GP Patient Survey and international comparators. Overall, 94.8% of residents in Gloucestershire aged 16 and over answered the question. Of these, almost 2,200 people (0.4%) regarded their gender identity to be different from the sex registered at birth. The East and West areas also saw 0.4% of their population stating their gender identity was different from the sex registered at birth. However, in the East 95.1% of residents answered the question this was slightly higher than the 94.5% in the West.

[66] 2021 Census, ONS

	 *Figure 7: Gender identity, 2021, Gloucestershire, East, West, districts and England and Wales*[67]
Pregnancy & maternity	There were 5,839 live births in Gloucestershire in 2023, this equates to a crude fertility rate of 8.9 live births per 1,000 people of all ages. This was lower than the national average of 9.7 live births per 1,000 people of all ages. Looking at the East and West areas, the highest crude birth rate was in the West (9.1), which exceeded the county average but was lower than the national average. The East had a crude birth rate of 8.6 live births per 1,000 people, this was lower than the county and national average. Crude birth rates are affected by the

[67] *Ibid.*

demographic make-up of an area. Gloucestershire's relatively older population means it has proportionally less women of childbearing age than England, which may explain its lower crude birth rate.

Table 9: Crude birth rates, 2023[68]

	Live births	Total Population	Crude Birth Rate per 1,000 population
Cheltenham	1,009	120,255	8.4
Cotswold	657	91,490	7.2
Tewkesbury	1,001	98,896	10.1
East	**2,667**	**310,641**	**8.6**
Forest of Dean	709	89,104	8.0
Gloucester	1,448	134,991	10.7
Stroud	1,015	124,540	8.1
West	**3,172**	**348,635**	**9.1**
Gloucestershire	**5,839**	**659,276**	**8.9**
England and Wales	591,072	60,854,727	9.7

The limitation of crude birth rates is that it doesn't account for the age and sex structure of the population. General Fertility Rates account for this by expressing live births per 1,000 females aged 15-64, this adjusts for women of childbearing age in an area. A higher general fertility rate (GFR) means that, on average, more children are being born to women of reproductive age. The General Fertility Rate in Gloucestershire stands at

[68] Live births in England and Wales, ONS

50.4 live births per 1,000 females aged 15-44, which is slightly higher than the national average. Looking at the East and West areas, the highest general fertility rate was in the West (51.9), which exceeded the county average but was lower than the national average. The East had a general fertility rate of 48.8 live births per 1,000 females aged 15-44, this was lower than the county and national average.

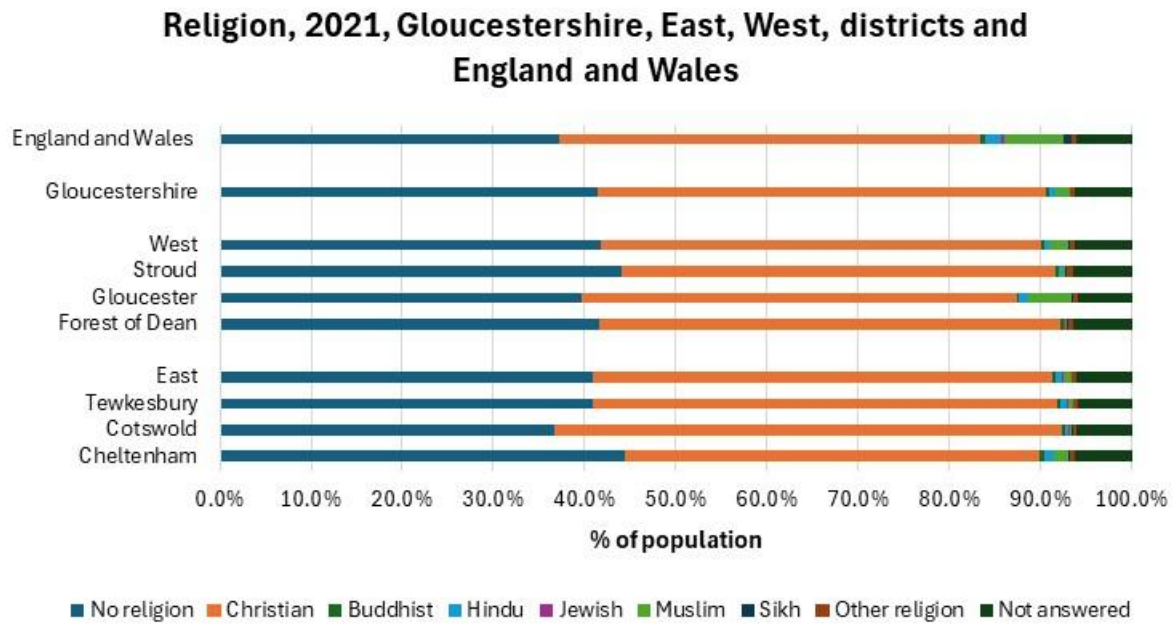
Table 10: General Fertility Rates, 2023[69]

	Live births	15-44 year old female population	General Fertility Rate per 1,000 population
Cheltenham	1,009	23,432	43.1
Cotswold	657	13,724	47.9
Tewkesbury	1,001	17,525	57.1
East	**2,667**	**54,681**	**48.8**
Forest of Dean	709	14,206	49.9
Gloucester	1,448	26,915	53.8
Stroud	1,015	19,969	50.8
West	**3,172**	**61,090**	**51.9**
Gloucestershire	**5,839**	**115,771**	**50.4**
England and Wales	591,072	11,879,690	49.8

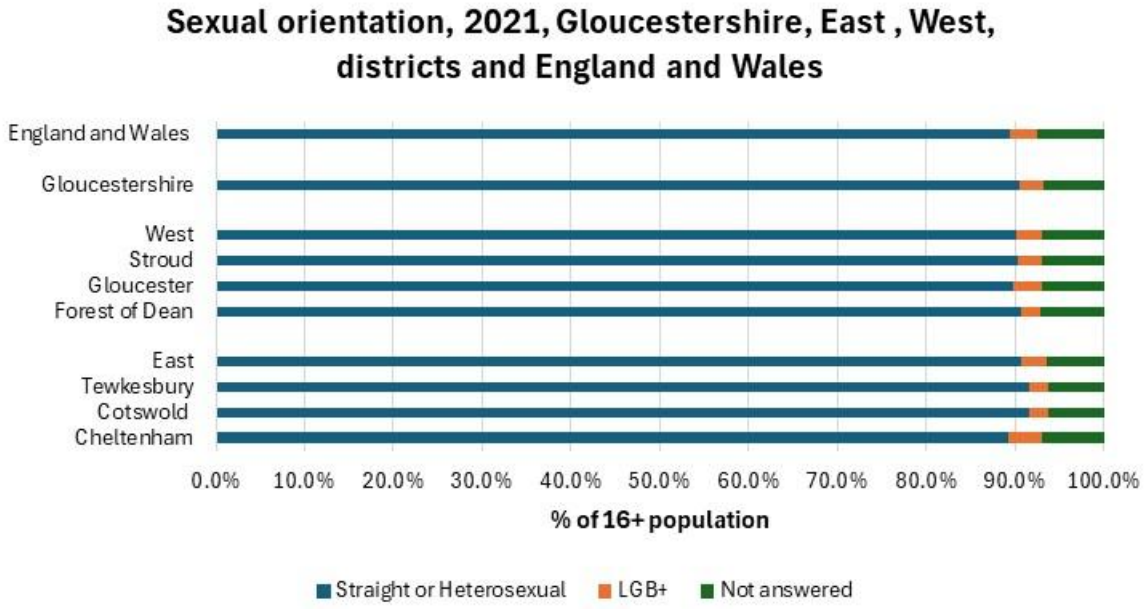
Religion and/or belief	The 2021 Census asked about religion, but this question was voluntary and 'no religion' was a common answer, a proportion of people also chose not to answer the question.

[69] Live births in England and Wales, ONS

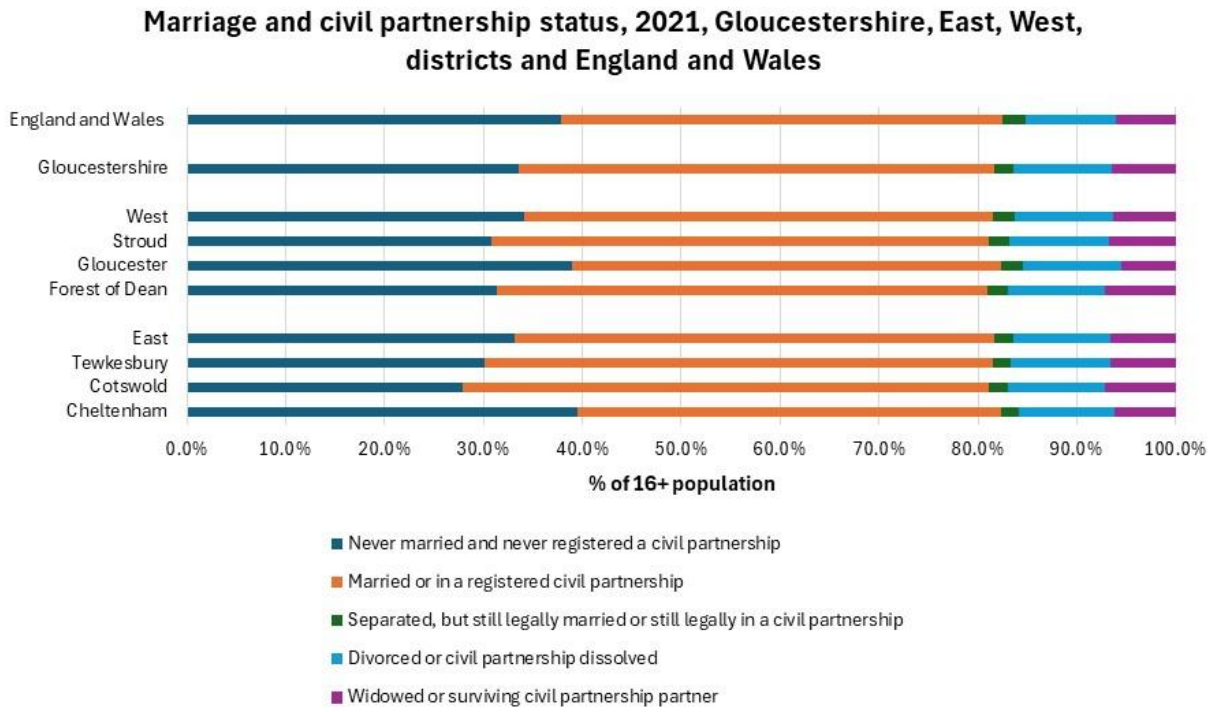
	According to the 2021 Census, 49.2% of residents in Gloucestershire were Christian, making it the most common religion, the proportion of residents selecting this religion was higher than the national average (46.2%). The East and West have a broadly similar proportion of residents who identified as Christian to Gloucestershire with figures of 50.2% and 48.3% respectively. No religion accounts for the second largest proportion of residents in Gloucestershire, East and West. In Gloucestershire 41.4% of residents fall into this category, higher than the national average of 37.2%. In the East area 41.0% of residents are classified as having no religion, slightly lower than the Gloucestershire figure but higher than the national figure, while in the West area 41.7% of residents fall into this category, higher than the Gloucestershire and national figure. Islam was the second most common religion in Gloucestershire, East and West Areas, Muslims represented 1.4% of Gloucestershire residents considerably below the national average of 6.5%. In the East area 0.8% of residents are classified as Muslim, slightly lower than the Gloucestershire figure and considerably lower than the national figure, while in the West area 2.0% of residents fall into this category, higher than the Gloucestershire figure but lower than the national figure.

	 *Figure 8: Religion, 2021, Gloucestershire, East, West, districts and England and Wales*[70]
Sexual orientation	As with gender identity, the Census 2021 has provided the first set of official data on sexual orientation in England and Wales. In the 2021 Census there was a new question around sexual orientation, asking 'which of the following best describes your sexual orientation?', and providing a list of options. It was directed only at people aged 16 and over, and answers were voluntary. Overall, 93.2% of residents in Gloucestershire aged 16 and over answered the question. The majority of people who answered described their sexual orientation as 'straight or heterosexual', at 90.4% of the population. This is slightly higher than the national average of 89.4%. In

[70] *Ibid.*

	the East area 90.6% of residents described their sexual orientation as 'straight or heterosexual', marginally higher than the county average and the figure for the West (90.2%).  *Figure 9: Sexual orientation, 2021, Gloucestershire, East, West, districts and England and Wales*[71]
Marriage & civil partnership	There minimal differences between Gloucestershire, the East and West areas. The East area has a slightly lower proportion of people who have never married and never registered a civil partnership (33.1%) than the West (34.1%) with the county sitting in the middle of the two areas (33.6%). Conversely the West area has a slightly

[71] *Ibid.*

	lower proportion of people who have married or are in a registered civil partnership (47.5%) than the East (48.6%) with the county again sitting in the middle (48.0%).  *Figure 10: Marriage and civil partnership status, 2021, Gloucestershire, East, West, districts and England and Wales*[72]
Armed Forces community	Local authorities, national government, businesses, local authorities, charities and the public have committed to support the Armed Forces community through the Armed Forces Covenant. It was adopted in 2011 and

[72] *Ibid.*

articulated the principles of no disadvantage and special consideration; that no current or former member of the armed forces, or their families, should be at a disadvantage compared to other residents in the provision of public and commercial services. This was followed by the Armed Forces Act 2021 introduced a new requirement for some public bodies, including the NHS and local authorities, to pay due regard to the principles of the Covenant when carrying out specific public functions in the areas of housing, healthcare and education.

The information captured relates to armed forces veterans rather than current personnel and was captured by the 2021 Census. In 2021 there were there 27,418 people who had previously served in the UK armed forces resident in Gloucestershire. This equates to 5.2% of the 16+ population. The proportion of armed forces veterans was higher in Gloucestershire than it was across England and Wales (3.8%). The East has a slightly higher proportion of armed forces veterans (5.4%) than the West (4.9%) and the county as a whole, but the difference is minimal.

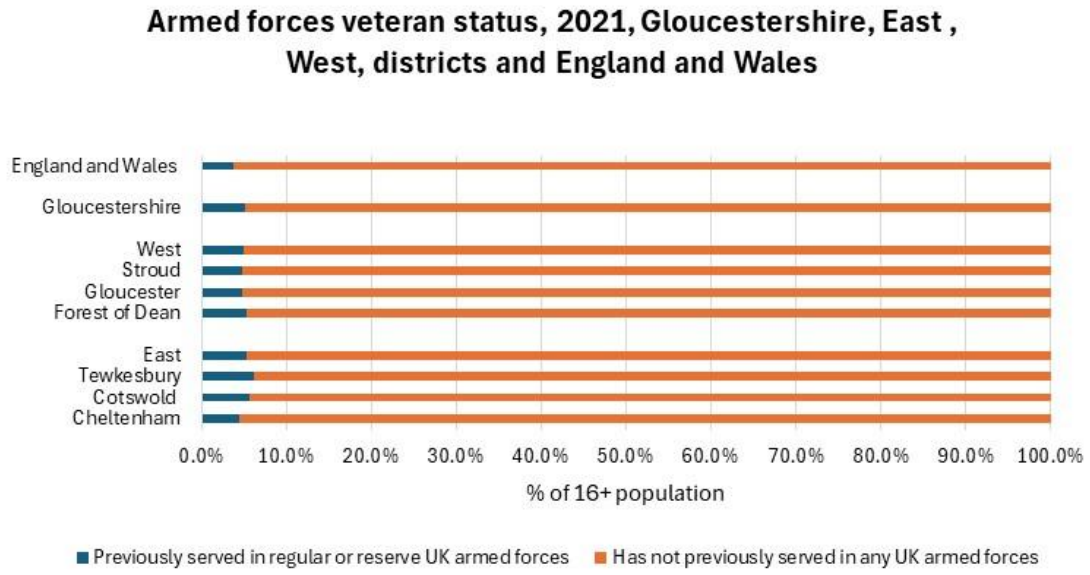


Figure 11: Armed Forces Veteran Status, 2021, Gloucestershire, East, West, districts and England and Wales[73]

Carers

This information is based on self-reported caring status according to the 2021 Census, this means figures will be different from sources which look at registered carers.

In 2021, there were 51,862 people aged 5+ providing unpaid care in Gloucestershire, this is equivalent to 8.5% of the population. In comparison, a slightly higher proportion of the population in England and Wales (8.9%) said they provided unpaid care. In the East area 8.0% of residents aged 5+ provided unpaid care higher slightly higher than the county average and the figure of 8.9% seen when looking at the West area. There are minimal differences observed in the levels of care provided by the East, West and Gloucestershire total.

Table 11: Residents aged 5+ by caring status, 2021, Gloucestershire, East, West, districts and England and Wales[74]

	Percentage of 5 + Population				
	Provides no unpaid care	**Proved some unpaid care**	**Provides 19 hours or less unpaid care a week**	**Provides 20 to 49 hours unpaid care a week**	**Provides 50 or more hours unpaid care a week**
Cheltenham	92.6%	7.4%	4.2%	1.3%	1.9%
Cotswold	91.9%	8.1%	4.7%	1.2%	2.2%
Tewkesbury	91.5%	8.5%	4.7%	1.4%	2.4%
East	**92.0%**	**8.0%**	**4.5%**	**1.3%**	**2.1%**
Forest of Dean	90.3%	9.7%	5.1%	1.7%	2.9%
Gloucester	91.6%	8.4%	4.2%	1.8%	2.4%
Stroud	91.1%	8.9%	5.3%	1.4%	2.2%

[73] 2021 Census, ONS
[74] *Ibid.*

West	**91.1%**	**8.9%**	**4.8%**	**1.7%**	**2.4%**
Gloucestershire	**91.5%**	**8.5%**	**4.7%**	**1.5%**	**2.3%**
England and Wales	**91.1%**	**8.9%**	**4.3%**	**1.8%**	**2.7%**

Care leavers / care experienced adults

This information is based on self-reported caring status according to the 2021 Census, this means figures will be different from sources which look at registered carers.

In 2021, there were 51,862 people aged 5+ providing unpaid care in Gloucestershire, this is equivalent to 8.5% of the population. In comparison, a slightly higher proportion of the population in England and Wales (8.9%) said they provided unpaid care. In the East area 8.0% of residents aged 5+ provided

unpaid care higher slightly higher than the county average and the figure of 8.9% seen when looking at the West area. There are minimal differences observed in the levels of care provided by the East, West and Gloucestershire total.

Percentage of 5 + Population Provides no unpaid care Proved some unpaid care Provides 19 hours or less unpaid care a week Provides 20 to 49 hours unpaid care a week Provides 50 or more hours unpaid care a week

	Percentage of 5 + Population				
	Provides no unpaid care	**Proved some unpaid care**	**Provides 19 hours or less unpaid care a week**	**Provides 20 to 49 hours unpaid care a week**	**Provides 50 or more hours unpaid care a week**
Cheltenham	92.6%	7.4%	4.2%	1.3%	1.9%
Cotswold	91.9%	8.1%	4.7%	1.2%	2.2%
Tewkesbury	91.5%	8.5%	4.7%	1.4%	2.4%
East	**92.0%**	**8.0%**	**4.5%**	**1.3%**	**2.1%**

	Forest of Dean	90.3%	9.7%	5.1%	1.7%	2.9%
	Gloucester	91.6%	8.4%	4.2%	1.8%	2.4%
	Stroud	91.1%	8.9%	5.3%	1.4%	2.2%
	West	**91.1%**	**8.9%**	**4.8%**	**1.7%**	**2.4%**
	Gloucestershire	**91.5%**	**8.5%**	**4.7%**	**1.5%**	**2.3%**
	England and Wales	**91.1%**	**8.9%**	**4.3%**	**1.8%**	**2.7%**

Digital exclusion

Very little information is collected about this group. The latest information taken from the Participation Survey is at district level and covers the period from May 2023 to March 2024. The results show that in Gloucestershire an estimated 95.6% of respondents have used the internet either at home or elsewhere which is higher than England average of 92.7%. The West area (94.4%) has a lower rate than the East (96.8%) and the county average but still exceeds the national average.

Table 12: Percentage of respondents aged 16 and over who have used the internet either at home or anywhere else, Gloucestershire, East and West, districts and England, 2023-2024[75]

	Percentage of 16+ Population
Cheltenham	96.9%
Cotswold	94.4%
Tewkesbury	95.8%
East	**96.8%**
Forest of Dean	91.3%

[75] Participation Survey, DCMS

<table>
<tr>
<td></td>
<td>
<table>
<tr><td>Gloucester</td><td>92.3%</td></tr>
<tr><td>Stroud</td><td>95.9%</td></tr>
<tr><td>West</td><td>94.4%</td></tr>
<tr><td></td><td></td></tr>
<tr><td>Gloucestershire</td><td>95.6%</td></tr>
<tr><td></td><td></td></tr>
<tr><td>England</td><td>92.7%</td></tr>
</table>
</td>
</tr>
<tr>
<td>Geography, for example, urban and rural areas</td>
<td>
This includes specific areas and rural/urban geographies and how this can make it difficult for some people to access the services they need.
The 2021 Rural-Urban Classification (RUC) is a statistical classification system used to categorise geographies based on the form and characteristics of the settlements present within them. It aims to provide a consistent and standardised method for classifying areas as Rural or Urban, based on address density, physical settlement form, population size, and relative accessibility.
Gloucestershire has a significantly higher proportion of its population living in rural areas than the national average (17.5%). The East area has a higher proportion of its residents living in rural areas (32.6%) than the West (26.2%) and the county average.
</td>
</tr>
</table>

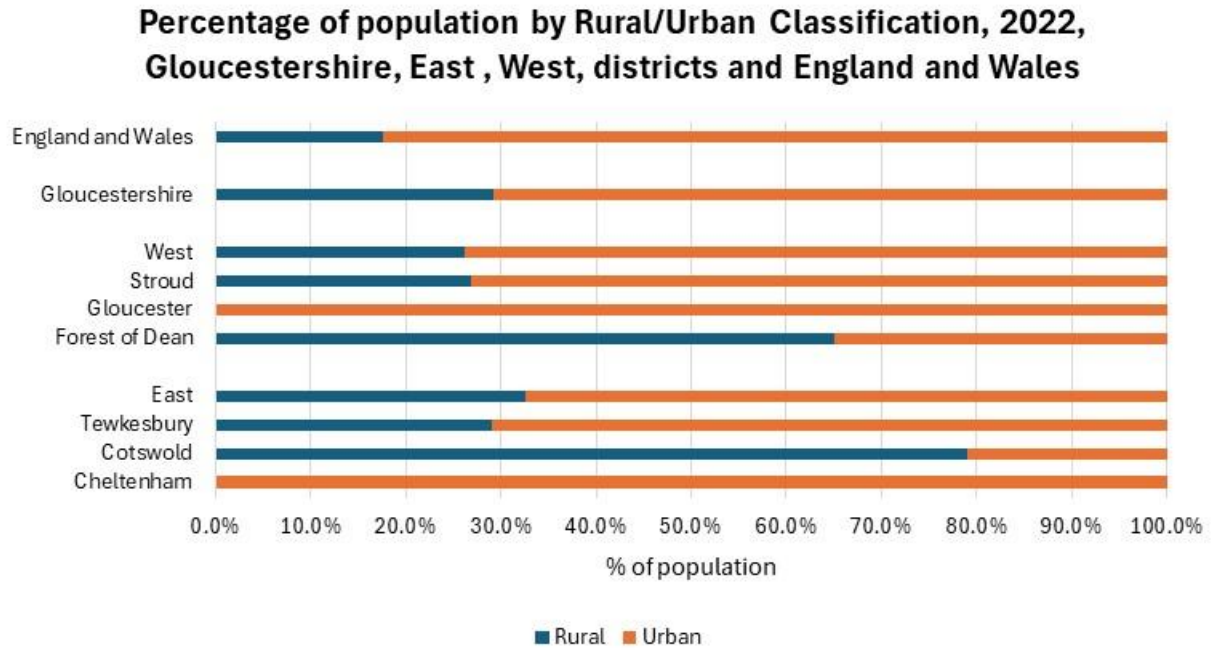
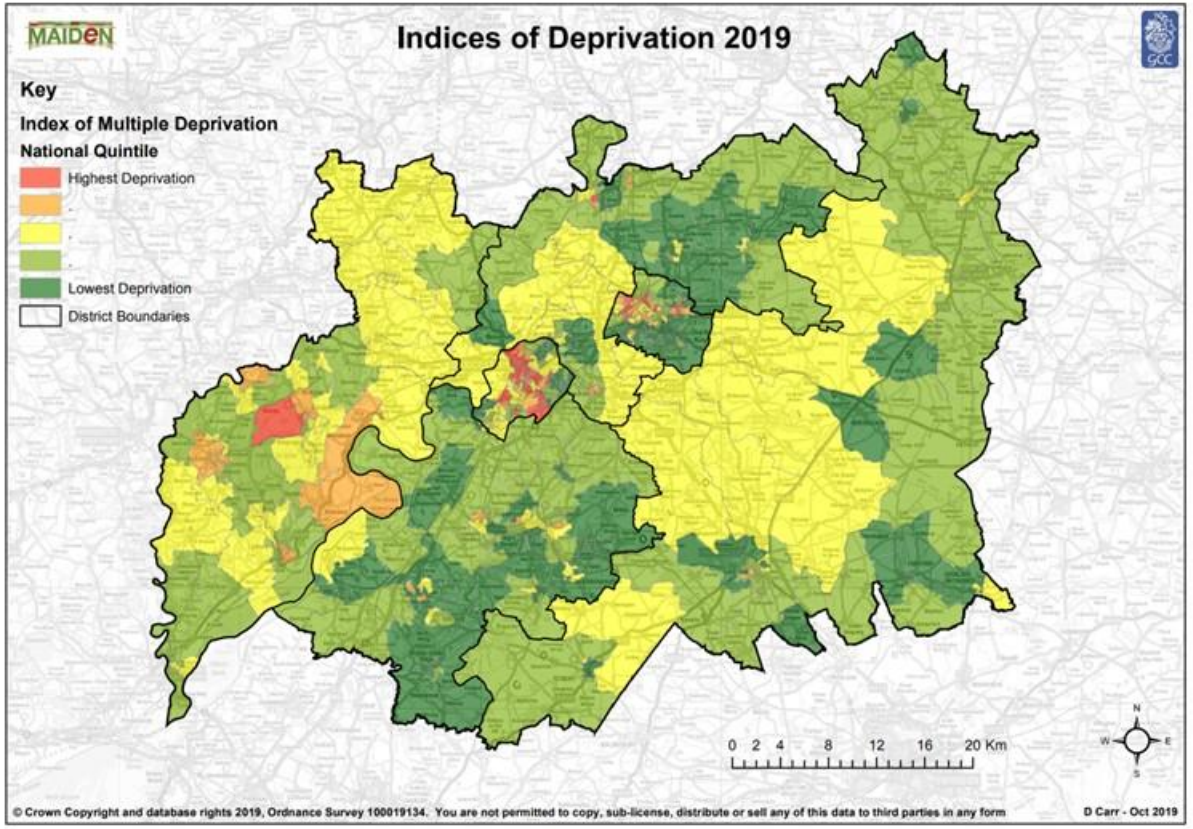


Figure 12: Percentage of population by Rural/Urban Classification, 2022, Gloucestershire, East, West, districts and England and Wales[76]

Socio-economic disadvantage	The main measure for this is the Indices of Multiple Deprivation. In general, Gloucestershire is not a very deprived county, ranking 126 out of 151 (where 1 is the most deprived) county and unitary authorities, putting it in the least deprived 20% of authorities across England. At district level, even the most deprived districts in the county (Gloucester City, and Forest of Dean) are amongst the middle 20% of districts for deprivation out of 317 English authorities. Tewkesbury, Cotswold, and Stroud

[76] Rural Urban Classification, 2021 and 2022 Mid Year Estimates, ONS

districts are in the least deprived 20% of districts nationally. Cheltenham is in the second least deprived 20% of districts nationally. However, there are pockets of deprivation, 31 out of 373 small areas in Gloucestershire are amongst the 20% most deprived in England with 7.9% residents of Gloucestershire living in these areas[77].



[77] Indices of Deprivation, 2019, MHCLG

Figure 13: Indices of Deprivation, 2019[78]

The West area has a higher proportion of residents living in the most deprived 20% nationally (10.9%) than the East (4.5%) and the county as a whole (7.9%)

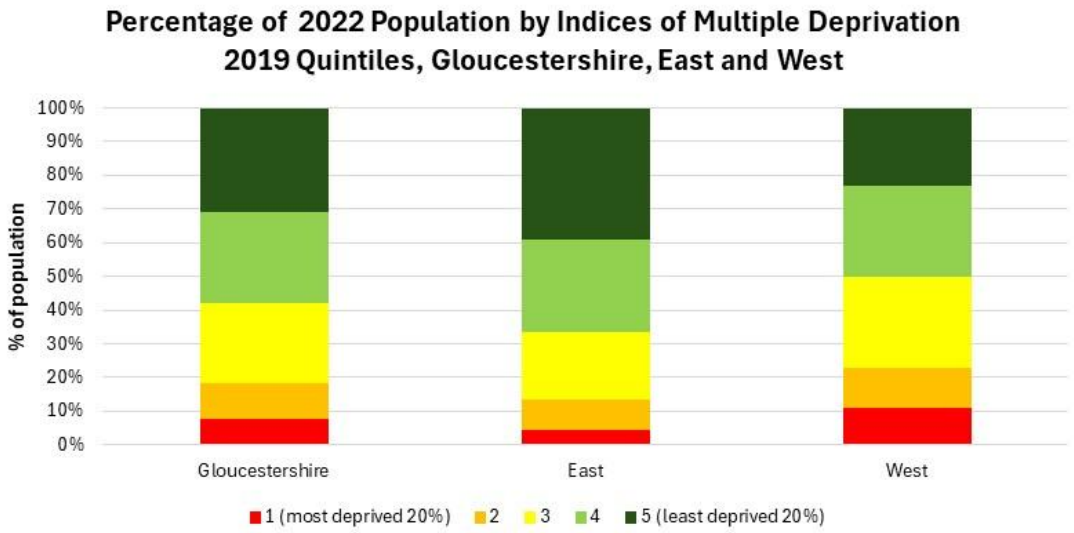


Figure 14: Percentage of 2022 population by Indices of Multiple Deprivation 2019 Quintiles, Gloucestershire, East and West[79]

Table 13: Percentage of 2022 population by the domains of Indices of Deprivation 2019 Quintiles, Gloucestershire, East and West[80]

	Gloucestershire	East	West

[78] *Ibid.*
[79] Indices of Deprivation, 2019, MHCLG and Mid 2022 Population Estimates, ONS
[80] Indices of Deprivation, 2019, MHCLG and Mid 2022 Population Estimates, ONS

	1 (most deprived 20%)	2	3	4	5 (least deprived 20%)	1 (most deprived 20%)	2	3	4	5 (least deprived 20%)	1 (most deprived 20%)	2	3	4	5 (least deprived 20%)
Index of Multiple Deprivation (IMD)	8%	11%	24%	27%	31%	5%	9%	20%	27%	39%	11%	12%	27%	27%	23%
Income	9%	13%	22%	29%	26%	6%	12%	16%	31%	36%	12%	14%	28%	27%	18%
Employment	8%	14%	21%	28%	28%	4%	12%	14%	29%	41%	12%	16%	28%	27%	17%
Education, Skills and Training	13%	18%	19%	23%	26%	10%	14%	15%	21%	40%	16%	23%	23%	24%	13%
Health Deprivation and Disability	8%	14%	17%	29%	32%	4%	12%	11%	30%	43%	12%	15%	23%	29%	22%
Crime	6%	9%	10%	23%	52%	5%	9%	8%	29%	49%	6%	8%	13%	18%	55%
Barriers to Housing and Services	19%	19%	22%	28%	13%	22%	13%	23%	30%	11%	16%	23%	21%	25%	15%
Living Environment	14%	14%	17%	24%	31%	13%	10%	21%	25%	31%	14%	18%	15%	23%	31%

Vulnerable groups of society	No specific data held on this characteristic. Where vulnerable groups are addressed through other characteristics.

Appendix 2: Council Staff Data and Information

Details of staff affected by the proposed activity:

<table>
<tr><th>Groups</th><th>Workforce Data and Information</th></tr>
<tr><td>Age</td><td>The table below summarises the most recent publicly available workforce figures for the councils.
<table>
<tr><th>Organisation</th><th>Snapshot date</th><th>Headcount / FTE</th><th>Age profile</th><th>Source</th></tr>
<tr><td>Gloucestershire County Council</td><td>1 Jul 2024</td><td>4,369 (excl. schools)</td><td>45–54 largest (32.4%)</td><td>GCC-EDI-2024</td></tr>
<tr><td>Stroud District Council</td><td>Apr 2022</td><td>379 (344.3 FTE) + 50 casual</td><td>50–59 largest group</td><td>SDC-Workforce-2022</td></tr>
<tr><td>Cheltenham Borough Council</td><td>Mar 2023</td><td>238 (220 FTE) + 12 casual</td><td>50–59 largest group</td><td>CBC-Workforce-2023</td></tr>
<tr><td>Tewkesbury Borough Council</td><td>31 Mar 2022</td><td>216</td><td>—</td><td>TBC-GPG-2022</td></tr>
<tr><td>Cotswold District Council</td><td>2024</td><td>Small direct workforce; most staff via Publica. Data provided represents 127 individuals</td><td>50–59 largest group (36.2%)</td><td>CDC-Publica-2024</td></tr>
<tr><td>Forest of Dean District Council</td><td>2024</td><td>Part of Publica; 270+ staff proposed to return. Data provided represents 112 individuals</td><td>50+ largest group (43.8%)</td><td>FODDC-Publica-2024</td></tr>
<tr><td>Gloucester City Council</td><td>2022</td><td>261</td><td>56+ largest group (26.1%)</td><td>GC-EDI-2022</td></tr>
</table></td></tr>
<tr><td>Disability</td><td>The table below summarises the most recent publicly available workforce figures for the councils.
<table>
<tr><th>Organisation</th><th>Snapshot date</th><th>Headcount / FTE</th><th>Disability</th><th>Source</th></tr>
<tr><td>Gloucestershire County Council</td><td>1 Jul 2024</td><td>4,369 (excl. schools)</td><td>4.80%</td><td>GCC-EDI-2024</td></tr>
</table></td></tr>
</table>

	Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	5.0%	SDC-Workforce-2022
	Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	10.1%	CBC-Workforce-2023
	Tewkesbury Borough Council	31 Mar 2022	216	—	TBC-GPG-2022
	Cotswold District Council	2024	Small direct workforce; most staff via Publica	1.57%	CDC-Publica-2024
	Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	2.36%	FODDC-Publica-2024
	Gloucester City Council	2022	261	6.1%	GC-EDI-2022

	Organisation	**Snapshot date**	**Headcount / FTE**	**Gender split**	**Source**
Sex	Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	70.1% F / 29.9% M	GCC-EDI-2024
	Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	58.6% F / 41.4% M	SDC-Workforce-2022
	Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	52.9% F / 47.1% M	CBC-Workforce-2023
	Tewkesbury Borough Council	31 Mar 2022	216	70.4% F / 29.6% M	TBC-GPG-2022
	Cotswold District Council	2024	Small direct workforce; most staff via Publica	70.87% F/ 29.13% M	CDC-Publica-2024
	Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	65.18% F/ 34.82% M	FODDC-Publica-2024
	Gloucester City Council	2022	261	60.9% F / 39.1% M	GC-EDI-2022
Race	The table below summarises the most recent publicly available workforce figures for the councils.				

	Organisation	**Snapshot date**	**Headcount / FTE**	**Ethnicity**	**Source**
	Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	White British 86.6%; DEC 7.5%	GCC-EDI-2024
	Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	89.7% White British	SDC-Workforce-2022
	Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	210 White British; 11 Other; 17 Unknown	CBC-Workforce-2023
	Tewkesbury Borough Council	31 Mar 2022	216	—	TBC-GPG-2022
	Cotswold District Council	2024	Small direct workforce; most staff via Publica	White - British: 29.92%	CDC-Publica-2024
	Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	White – British: 36.61%	FODDC-Publica-2024
	Gloucester City Council	2022	261	White 70.5%; Unstated 21.5%; BME 8.0%	GC-EDI-2022
Gender reassignment	No data is publicly available regarding gender reassignment for any of the councils.				
Marriage & civil partnership	The table below summarises the most recent publicly available workforce figures for the councils.				
	Organisation	**Snapshot date**	**Headcount / FTE**	**Marriage & Civil Partnership**	**Source**
	Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	Divorced/Dissolved Civil Partnership 5.8%; Married/Civil 48.2%; Separated 2.4%; Single/Never Married 35.3%; Widowed 0.6%; Prefer not to say 7.7%	GCC-EDI-2024

	Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	—	SDC-Workforce-2022
	Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	—	CBC-Workforce-2023
	Tewkesbury Borough Council	31 Mar 2022	216	—	TBC-GPG-2022
	Cotswold District Council	2024	Small direct workforce; most staff via Publica	Married: (7.56% Single: 14.17% Divorced: 3.94% Living with Partner: 0.79% Widowed: 0.79%	CDC-Publica-2024
	Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	Married: 16.07% Single: 6.25% Divorced: 0.89%	FODDC-Publica-2024
	Gloucester City Council	2022	261	-	GC-EDI-2022
Pregnancy & maternity	No data is publicly available regarding Pregnancy & Maternity for any of the councils.				
Religion and/or belief	The table below summarises the most recent publicly available workforce figures for the councils.				

Organisation	Snapshot date	Headcount / FTE	Religion	Source
Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	Buddhist 2.1%; Christian 32.2%; Hindu 0.0%; Jewish 0.0%; Muslim 3.4%; None	GCC-EDI-2024

				52.1%; Other 4.1%; Sikh 0.7%; Prefer not to say 5.5%	
	Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	—	SDC-Workforce-2022
	Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	—	CBC-Workforce-2023
	Tewkesbury Borough Council	31 Mar 2022	216	—	TBC-GPG-2022
	Cotswold District Council	2024	Small direct workforce; most staff via Publica	No religious belief: 20.47% Christian: 3.94% Some other religion or belief: 0.79% Prefer not to say: 74.80%	CDC-Publica-2024
	Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	Christian: 2.68% No religious belief: 1.79% Prefer not to say: 0.89% Protestant: 0.89% Blank / Not Provided: 93.75%	FODDC-Publica-2024
	Gloucester City Council	2022	261	-	GC-EDI-2022

Sexual orientation

The table below summarises the most recent publicly available workforce figures for the councils.

Organisation	Snapshot date	Headcount / FTE	Sexual orientation	Source

	Gloucestershire County Council	1 Jul 2024	4,369 (excl. schools)	Bi-sexual 2.6%; Gay/Lesbian 2.1%; Heterosexual/Straight 86.0%; Prefer not to say 9.4%	GCC-EDI-2024
	Stroud District Council	Apr 2022	379 (344.3 FTE) + 50 casual	—	SDC-Workforce-2022
	Cheltenham Borough Council	Mar 2023	238 (220 FTE) + 12 casual	—	CBC-Workforce-2023
	Tewkesbury Borough Council	31 Mar 2022	216	—	TBC-GPG-2022
	Cotswold District Council	2024	Small direct workforce; most staff via Publica	Heterosexual: 32.28% Not stated: 2.36% Bisexual: 0.79% Blank / Not Provided: 66.93%	CDC-Publica-2024
	Forest of Dean District Council	2024	Part of Publica; 270+ staff proposed to return	Heterosexual: 41.07% Blank / Not Provided: 58.93%	FODDC-Publica-2024
	Gloucester City Council	2022	261	-	GC-EDI-2022
Armed Forces community	No data is publicly available regarding the Armed Forces Community for any of the councils.				
Carers	No data is publicly available regarding Carers for any of the councils.				
Care leavers / care experienced adults	No data is publicly available regarding Care leavers / care experienced adults for any of the councils.				

Digital exclusion	No data is publicly available regarding Digital exclusion for any of the councils.
Geography, for example, urban and rural areas	No data is publicly available regarding Geography of the workforce for any of the councils.
Socio-economic disadvantage	No data is publicly available regarding Socio-economic disadvantage of the workforce for any of the councils.
Vulnerable groups of society	No data is publicly available regarding Vulnerable groups of society disadvantage of the workforce for any of the councils
References used for Staffing Data	GCC-EDI-2024: Gloucestershire County Council – Equality, Diversity & Inclusion (EDI) Report 2024/25 https://www.gloucestershire.gov.uk/media/2126661/edi-report2024_workforce_final_.pdf SDC-Workforce-2022: Stroud District Council – Workforce Statistics (April 2022) https://www.stroud.gov.uk/media/2103085/workforce-statistics-2022.pdf CBC-Workforce-2023: Cheltenham Borough Council – Workforce Statistics (March 2023) https://www.cheltenham.gov.uk/downloads/file/6208/workforce-statistics-march-2023 TBC-GPG-2022: Tewkesbury Borough Council – Gender Pay Gap Report 2022 https://www.tewkesbury.gov.uk/media/fzxhofgv/gender-pay-gap-report-2022-final.docx.pdf CDC-Publica-2024: Cotswold District Council – Council spending / staffing details (Publica model) https://www.cotswold.gov.uk/about-the-council/transparency-and-open-data/council/spending/ FODDC-Publica-2024: Forest of Dean District Council – News release (July 2024) https://news.fdean.gov.uk/news/local-authorities-to-consider-moving-forward-with-plans-to-take-greater-control-of-council-services

	GC-EDI-2022: Gloucester City Council Workforce Equality, Diversity & Inclusion Report (Sept 2022) https://www.gloucester.gov.uk/media/4m3p0bpy/city-workforce-equality-diversity-inclusion-report-final-2022.pdf LGA-GPG-2025: Local Government Association – The gender pay gap in English local authorities 2024/25 https://www.local.gov.uk/publications/gender-pay-gap-english-local-authorities-20242

This page is intentionally left blank

The Creation of Greater Gloucester and Gloucestershire Unitary Councils

DRAFT

Table of Contents

1. Executive Summary *3*
2. Rationale for Boundary Change *11*
3. Introduction and Context *12*
4. The Strategic Case *21*
a. Our Vision and Ambitions for Gloucestershire 21
b. Better Services for Residents 23
c. Delivering Value for Money 29
d. A Stronger Voice for Gloucestershire 31
e. Unlocking Growth & Innovation 33
f. Building Healthy Communities 34
g. Councils that Work for All 44
5. Future Devolution *46*
6. Options Appraisal *51*
7. The New Councils *58*
a. Future Operating Model 58
b. Democratic Arrangements 59
c. Locality Arrangements 62
d. Leadership Structure 70
e. Workforce 72
f. Technology & Data 75
8. The Overall Financial Case *81*
Economic Case 89
9. Listening to Gloucestershire *95*
10. Implementation Roadmap *102*
a. The Roadmap to Vesting Day 102
b. Managing Delivery 110
11. Conclusion *117*
Appendices *118*
Appendix A | Submission (unmodified): Gloucester City/Gloucestershire County Proposal 118
Appendix B | Inner Circle Report: A Case for Cities 127
Appendix C | Economic Impact Calculations 128
Appendix D | Additionality Adjustments 135
Appendix E | Cratus Public Engagement Report 139
Appendix F | Aggregation and Disaggregation Tables 140
Appendix G | Equality Impact Assessment 147

1. Executive Summary

A New Future for Gloucestershire

Gloucestershire stands at a turning point. Government has invited proposals on replacing the current two-tier system with single, unitary structures. This is an opportunity to build a structure of Local Government that will deliver improved outcomes and services for residents over the next 50 years. It is also an opportunity to enable the historic City of Gloucester and the County of Gloucestershire to achieve their potential - an innovative economy, a world-class natural and cultural heritage and optimally leveraging the economic powerhouse of Gloucester, with its capacity for significant housing and economic growth.

This is a once-in-a-generation opportunity to unlock growth, strengthen identity and improve outcomes.

This proposal offers a new model: two strong, complementary unitary councils designed around the real lives of our residents, Greater Gloucester (GG) and Gloucestershire Unitary (GU).

These councils will reflect the people and places they serve, making them able to tackle Gloucestershire's deepest challenges. They will reset failing services, address entrenched health inequalities and unlock sustainable growth. They will be simpler and fairer; they will improve outcomes for the vulnerable and protect our ancient heritage and identity. In addition, they will give a stronger voice to the people of Gloucestershire.

Rooted in Identity & Economy: Two Councils meeting the Needs of the Population

This proposal will replace the current system of one county council and six district councils with two strong, complementary unitary authorities. These authorities will reflect the true identities and heritage of the places they serve.

Greater Gloucester (GG) - comprising Gloucester City (and, subject to Ministerial direction to expand geographies beyond the existing boundary into neighbouring parishes within the existing Districts of Stroud, Tewkesbury and Forest of Dean, totalling a current population of some 178,000).

This urban authority will drive economic growth in the sub-region, built on the boundaries of the real lives of the residents who live and work in its geography. Most importantly, as a place with a significantly different demographic and deeper-rooted urban social challenges to the rest of the county, it will be able to relentlessly focus on the issues that matter to its population without the diversion of the challenges faced by rural Gloucestershire: in particular addressing higher social needs, tackling homelessness and improving children's services, along with protecting its heritage.

Building on the heritage of Gloucester as one of England's significant and largest cathedral cities, this proposal recognises its historic and current status as a regional centre.

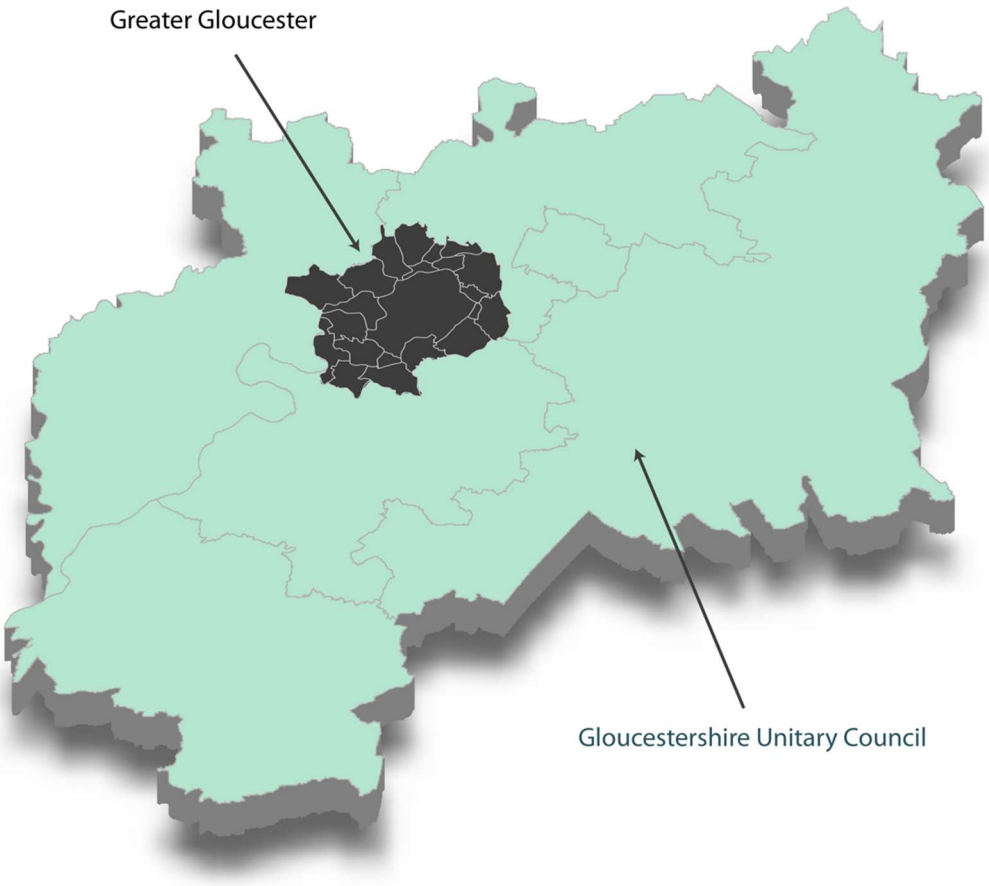
Gloucestershire Unitary (GU) - population c.470,000 - covering Cheltenham, the Cotswolds and (subject to a Ministerial direction to change boundaries, the remaining parts of) Stroud, Tewkesbury and Forest of Dean.

This authority will represent its very different demographic and need: it will be able to combine the economic strengths of Cheltenham, the country's leading cyber super-cluster, along with a strong focus on scale, stability and rural heritage and natural environmental assets, and ensuring the economic vibrancy of key

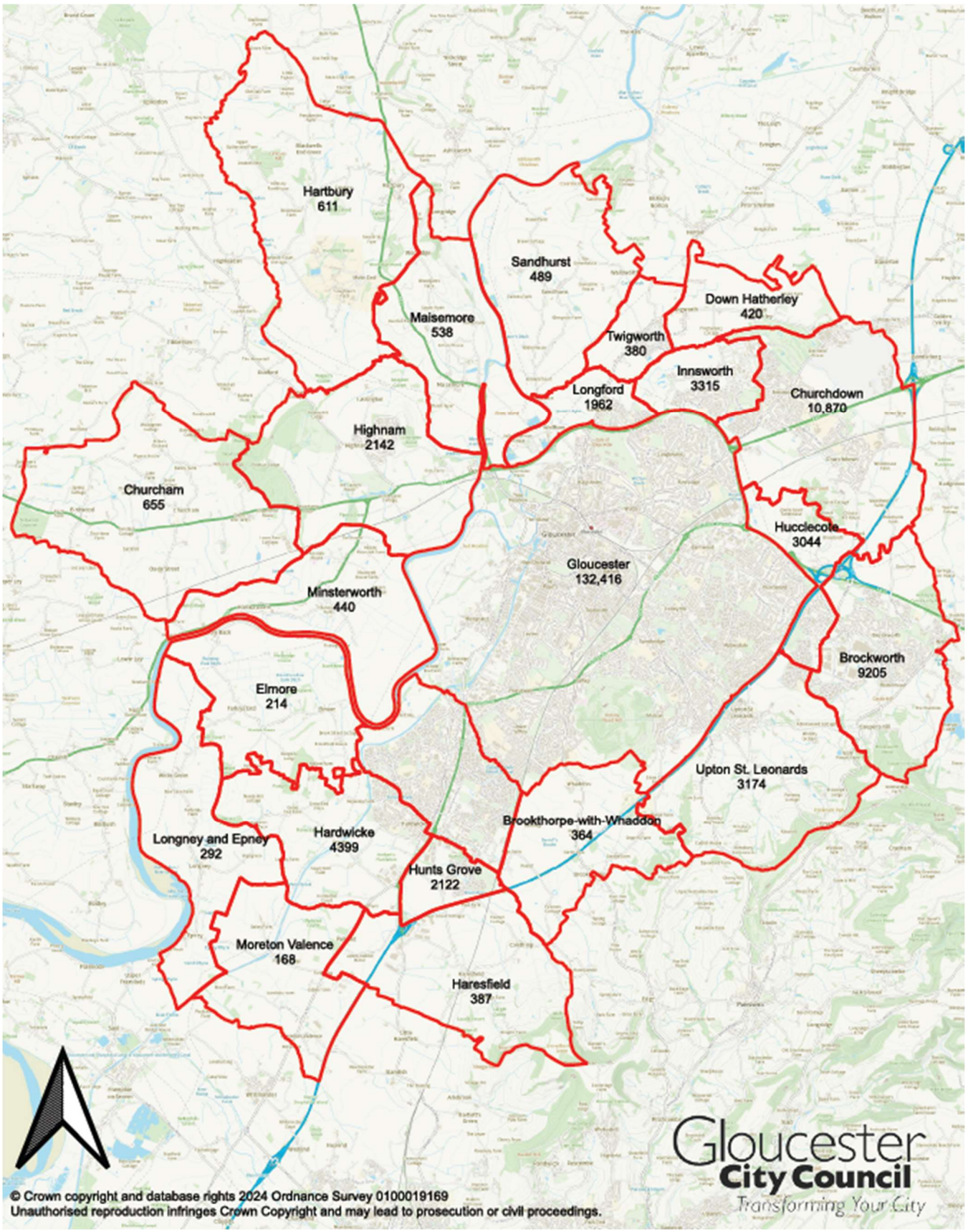
market towns. This council will have the ambition to deliver growth in market towns, secure rural transport connectivity and sustain prevention in adult care.

Together, these councils will simplify governance, end duplication and deliver services that are easier for residents to understand, outcomes that are better for all and local government that is truly rooted in the place it serves.

Proposed Unitaries*



* subject to Ministerial direction to expand the Greater Gloucester Council boundaries as set out in this proposal. The baseline unmodified proposal comprises a unitary for the Gloucester district and a unitary for the five other districts.



* Proposed boundary expansion for Greater Gloucester set out in this proposal. Numbers show 2021 population estimates.

Why We Need Change

The current system restricts growth, creates duplication and delays progress. City boundaries are outdated, services are split across seven councils, and government have said it is time for change. People deserve services that are easier to access, governance that is easier to understand and a system that works for them seamlessly, enabling economic growth, for the good of its residents.

Key services are ready for improvement: Adults and SEND have been rated as requiring improvement for over a decade, and many services are struggling to meet local need. The recent positive OFSTED report for Children's Services shows progress, but follows a decade of mixed performance.

Gloucestershire as a county has clear geographic division in need and these disparities have led to an inefficient and fragmented approach to support and service delivery. A single approach for the whole county that fails to recognise the differences in its population and places is bound to fail. Gloucester City has much higher demand for social care than the rest of the county, including in the area of homelessness and children's services. While it makes up 27% of the county's population, it accounts for over 35% of its demand for children's services.

The known demographic distinctions are not reflected in the current structure. Urban needs are managed within a county structure designed around predominantly older, more rural communities leading to misaligned planning and priorities. The proportion of people over 65 is 25% lower in Gloucester than the County average. In Gloucester, there are 21 Super Output areas in the highest quintile as measured by the index of multiple deprivation (with only 10 for the rest of the County). A more localised model would create opportunity for significant improvement in outcomes and delivery by allowing a hyper-local 'total place'-type focus on each area.

Meanwhile, economic growth in Gloucester is constrained by outdated district boundaries which do not reflect the lives of those who live and work in the city. Existing city boundaries are misaligned with the needs of our population, reducing efficiency, stifling housing growth and fragmenting service delivery[1].

As a recent national report identifies, many boundaries "were [historically] drawn intentionally close to the original urban core in order to limit growth," a legacy that "undermines both local leadership and a locally led planning system which can only function well if it is considering a place as a whole – if it is right-sized, with the right boundaries aligned to their true footprint and function" ("A Case for Cities" – Inner Circle).

Councils in Gloucestershire are already doing their best to work and plan across organisational boundaries, demonstrating current boundaries no longer reflect the working limits of the population.

Without boundary change, the city's size will not have the scale necessary to be able to deliver desired outcomes, or foster the economic growth required to sustain today's population. **The county is in need of change.**

[11] Appendix B: Case for Cities Report

England's smaller cities are some of our nation's greatest assets. English cities are economically dynamic centres of innovation, creativity, and culture - places with long history, deep roots and bold ambitions. From cathedral cities to the once historic market towns turned modern hubs, they generate ideas, nurture talent, and power regional economies. Their scale gives them something unique: the ability to connect people, place, and opportunity in ways that can transform lives and strengthen whole regions. They deserve attention, to be recognised and celebrated.

Equally, we can't deny that cities face their own distinct challenges - the reality is that many of our cities embody both the UK's greatest potential and its starkest inequalities.

Across the UK, smaller and medium-sized cities drive regional economies and provide opportunity for surrounding towns and rural communities, they carry the weight of complex challenges without the powers to address them at the scale required - we need governance which reflects our challenges and opportunities across cities. Cities…have different profiles to their surrounding counties that risk being 'swallowed up' into them. Instead, governance should reflect the fact that local people want and need control over their own economic development, housing, education, transport, social care and other services.

This is why getting the governance right matters. Our country is highly centralised. That centralisation will not diminish if our smaller cities have less control over their development, with this ceded to counties. Instead, we need to enable and empower cities to realise their potential, building on successful metro mayor models by making them fit for our smaller and medium-sized cities.

So much of the potential in cities remains untapped. Getting this right means our cities could be doing even more to drive national prosperity, strengthen communities, and tackle the great challenges of our age, from the housing crisis to health inequalities, from decarbonisation to skills – yet too many are held back by governance systems designed for a different era.

…They must be recognised meaningfully in Local Government Reorganisation and Devolution through city-led unitaries which are right-sized, with commitment to a long-term cities strategy…If we want stronger public services, higher productivity, and thriving local economies, then we must give our cities the powers to act with clarity, coherence, and confidence.

The Rt Hon. Annelise Dodds, Member of Parliament for Oxford East
The Case For Cities, 2025

What Difference It Will Make

This proposal addresses Gloucestershire's challenges head-on. The new councils will:

- **Improve outcomes for residents:** by addressing imbalance in demand for services - through early intervention, local place-based delivery and simpler access to services. The Councils will continue to work together where it makes sense to do so.

- **Reform failing services:** with Greater Gloucester focused on a younger demographic to improve children's services outcomes, tackle homelessness and health inequalities, while the Gloucestershire Unitary focuses on the rising pressures of an ageing, more rural population with challenges around transport connectivity and access to services - each council tackling the issues most acute in their area

- **Unlock growth:** giving Gloucester the ability to match the economic and housing growth performance of peer cities, while the Gloucestershire unitary sustains prosperity across market towns, villages and the rural economy, fostering accelerated growth through the Cheltenham Golden Valley cyber super-cluster

- **Create financial sustainability**: simplifying governance, reducing duplication will unlock operational savings; while a prevention-first delivery approach will improve outcomes in children's and adults' services bringing long-term savings. While having two councils brings higher costs than a single unitary, the wider benefits of the right geography far outweigh any efficiency savings foregone. This proposal will generate ongoing savings of £13.48m, will pay back transition costs in four years and by year 10 have created savings of £89m.

- **Preserve historic identity:** with Greater Gloucester strengthening Gloucester's heritage as an ancient cathedral city, and Gloucestershire Unitary protecting the internationally recognised heritage of locations such as the Cotswolds, Forest of Dean, Cheltenham, Tewkesbury and Stroud.

Together, the councils will tackle inequality, unlock city-led growth, improve essential services and preserve what people value most: local identity, heritage and accountability.

The size will enable the most efficient and targeted growth. Examples such as the former Cumbria County Council (Westmoreland and Furness Council and Cumberland Council) show how smaller, focused unitaries can drive improved performance in a short period of time and create systems that support sustainable, high quality services. The same can be achieved in Gloucestershire, with a place-based structure that tackles failing services, unlocks growth and strengthens identity.

Listening to Gloucestershire

This case is built with, not for, Gloucestershire - shaped by residents, councils and partners who see the logic of aligning governance to real places. The seven councils have worked hard to consult with a range of stakeholders about all aspects of the reorganisation process. The message that came through loud and clear in all the public engagement work undertaken is that people value their place and their local identity, and don't want to see this lost or diminished through any reorganisation. Gloucester residents, in particular, have a strong affinity with their distinct identity. Businesses and partners see the logic of aligning governance with real economic geographies and travel-to-work areas.

We will continue meaningful consultation with residents, councils, parishes, the VCSFE sector and businesses throughout the duration of this transition, ensuring local voices are heard and meaningfully reflected in the outworking of this case.

Devolution and the Wider Picture

Gloucestershire is actively exploring three strategic partnerships to the north, south, and east. Of these, we found each offer unique opportunities to accelerate growth and influence:

- West of England Combined Authority (WECA)
- Herefordshire and Worcestershire
- Swindon and Oxford

Whichever partnership is finally chosen, our ambition is that both councils would sit as full partners within the Combined Authority (WECA), ensuring Gloucestershire has a strengthened voice in discussions around housing, skills, transport and economic growth in the sub-region. As two unitary authorities rather than one, our size would be more akin to those other partners around the table.

Key strengths of this proposal

Three proposals for the future organisation of local government are currently under development by the seven councils in Gloucestershire. Key points of differentiation between this proposal and either or both of the others are as follows:

1. The only proposal to retain principal local government structures for both the historic city of Gloucester and the historic county of Gloucestershire
2. The only proposal to address the historic under-bounding of the city's geography up-front, avoiding the complexity of a post-restructure review a few years after vesting day
3. Two unitary councils able to be more focused on the needs of different demographic populations than a single county-wide unitary
4. Each unitary will have a significant (100k+ population) town or city at its centre, to drive twin hubs of economic growth for the county
5. Fairer democratic representation for the residents of Gloucestershire (compared to the existing constituent authorities' population sizes) if joining the West of England Combined Authority than a single county-based unitary
6. Stronger voice for the neighbouring parishes and parish councils around Gloucester on the future development of the city than alternatives
7. Higher Councillor to Elector ratios than other proposals, giving increased democratic representation and accountability.
8. The only proposal that is not expected to lead to the future parishing of the City of Gloucester, with the associated increased precepting risk that that entails
9. Lower redundancy costs and job losses during transition than a single county unitary option, avoiding unhelpful waste of public funds and loss of technical expertise in the new unitary councils.
10. The only proposal to be based around two 'continuing' authorities, meaning that transformation costs will be lower, and maximising use of existing IT infrastructure.

Next Steps

- 28 November 2025 - Submission of the business case
- May 2027- Elections to shadow authorities
- April 2028 - Vesting Day: Greater Gloucester and Gloucestershire Unitary take full control of services
- May 2029 - Potential integration with existing/creation of new Strategic Mayoral Authority

This aligns Gloucestershire's governance with the national timetable for new unitary authorities and combined authorities.

A phased transition will protect vital services, give communities confidence and ensure delivery is stable throughout.

2. Rationale for Boundary Change

We are formally submitting the a 'Type B' submission (as set out in the Local Government and Public Involvement in Health Act 2007) for two new Gloucestershire Unitary Councils which is set out in Appendix A.

However, we are clear that the 1974 boundaries of existing districts and boroughs no longer reflect the way in which people in Gloucestershire live their lives. Specifically, we believe that a major constraint on the growth of the city of Gloucester has been that the city is under bounded, restricting the potential of the City to drive the economy of the county. Therefore, in our proposal, whilst we are retaining the county boundary of Gloucestershire, we have submitted a modification request to expand the boundaries of the Gloucester City unitary to include surrounding Parishes which are in the existing districts of Tewkesbury, Stroud and Forest of Dean to create a Greater Gloucester unitary council. Appendix A outlines the rationale for this proposed modification.

3. Introduction and Context

Cities are where most of us make a home. They are the nation's engines of growth and innovation and critical to economic success at the regional level. They're also centres of cultural vibrancy and diversity and where most public services are centred.

Some 80% of us live in cities (70% in Gloucestershire). With economic growth the Government's declared number one priority, and local government reorganisation (LGR) now in motion across large parts of the country, there is a once-in-a-lifetime opportunity to connect policy thinking around cities' role in the life blood of the country.

Devolution and LGR offer a vital opportunity to unleash our cities' potential. It offers a chance, if we grasp it quickly, to grow a distinct and diverse network of cities.

There are well-documented agglomeration benefits from creating clusters of businesses in and around cities that drive innovation and economic growth.

The potential Gross Added Value generated through globally significant clusters of advanced manufacturing, cyber technology, AI and other technologies runs into the billions, and dwarfs the scale of savings that could be achieved alone by merging councils into larger units of local government.

Devolution and LGR offer a vital opportunity to unleash our cities' potential. We have a chance to grow a distinct and diverse network of cities that can support housing growth, tackle poverty and homelessness and drive a prevention revolution in public health that should keep many more people out of our NHS and care systems.

Cities also offer a more sustainable way of living, with a smaller land take and carbon footprint than rural-based communities; and a more immediate return on investment in public transport and active travel through the connectivity and public health benefits they provide.

To advance policy thinking around cities, we have to break through old boundaries – literally. Many of our small cities are under-bounded, which has constrained their growth. In order to achieve our future vision for cities, we need to redraw the boundaries to enable their expansion.

And we need to give them a clear voice and the opportunity to properly represent their potential, alongside London and the core cities, that already have an established place in the national growth agenda.

Of course, cities don't exist in a vacuum. They are interconnected with their local areas. In a new world of unitary councils and regional devolution, successful units of local government based on cities can champion their interests while working in partnership with neighbouring rural-based authorities. In this way the right levels of growth can be achieved in the right places.

This thinking forms the basis for this proposal for LGR in Gloucestershire. It proposes the creation of **two new unitary councils** to replace the seven councils that currently exist:

- one based around the county capital **City of Gloucester** – an historic yet diverse, young and vibrant city with a quarter of the entire county's population and employment, driving economic growth through a significant programme of urban regeneration, and
- one based around the rest of the **county of Gloucestershire** – a largely rural county rich in heritage

but with key natural assets such as the Forest of Dean and the Cotswolds, and nationally-leading strengths in green technologies and cyber resilience.

The needs, demands, challenges and opportunities faced by a largely young and urban population are very different to those of an older and more rural population. Form should follow function and Councils should be designed around the needs of the people they serve. This forms the rationale underpinning this LGR proposal. Together, they provide the best form of local government for Gloucestershire.

Creating a Greater Gloucester Unitary Authority, and a Unitary Authority for the rest of Gloucestershire, will:

- **Provide clarity and accountability** – one council for all residents and businesses, ending the two-tier confusion of who does what, making local democracy more transparent
- **Unlock inclusive growth and prosperity** – aligning housing, planning, transport and skills under one authority to deliver more homes, modern infrastructure and sustainable economic growth, ensuring the benefits are shared across all communities
- **Tackle inequalities through prevention** – integrating housing, health, social care and early help to support people earlier and more effectively, reducing crises, improving outcomes and delivering efficiencies
- **Drive efficiency and innovation** – consolidating functions to free up resources for frontline services, enabling more joined-up, digitally enabled and neighbourhood-based delivery tailored to local need
- **Strengthen place-based identity** – protecting historic, cultural and civic roles while creating a governance model that reflects lived community identities and ambitions
- **Secure Gloucester's seat at the devolution table** – ensuring that the influential city of Gloucester is properly represented in regional decision-making, closing the democratic deficit and giving residents the influence they deserve over investment and powers that shape their daily lives.

The proposal is ambitious but realistic, and rooted in evidence. It is not a detailed blueprint for how services will operate on day one. Those decisions will rightly rest with the new shadow councils and elected members during transition. However, the proposal does set out a compelling vision. By establishing these two new unitary authorities, Gloucestershire will gain the scale, financial resilience and democratic voice it needs to deliver better services, stronger local leadership, and a future-proof system of local government.

Joint working – two unitary Councils working for the benefit of the people of Gloucestershire

Gloucestershire already has a strong foundation for joint working, backed by a range of formal and informal governance arrangements**.** These reflect the close ties between different parts of the county and a shared commitment to collaboration.

Key structures include:

- **Leadership Gloucestershire:** a strategic alliance of senior public sector leaders - spanning councils, health, police, and key agencies - providing unified direction on cross-cutting issues to benefit communities countywide.
- **Gloucestershire City Region Board**: a joint committee of all seven councils, driving a shared vision for strategic growth and economic success, and championing Gloucestershire with partners to attract further investment and growth.
- **Health and Wellbeing Board and a Health and Wellbeing (Integrated Care) Partnership**
- **Strategic Local Plan**: when finalised, this will shape future housing and employment growth across

three local planning authority areas.

- **Climate Leadership Gloucestershire**: an innovative public sector partnership of councils, NHS, police and academic institutions, developing solutions to tackle the climate emergency.
- **Gloucestershire Business Rates Pool:** Gloucestershire boosts local growth by pooling business rates to keep more revenue circulating within the county.
- Other informal arrangements exist to enable joint working on other areas of shared responsibility, for example **Gloucestershire Resources and Waste Partnership**, **Gloucestershire Strategic Migration Partnership**, **Gloucestershire Housing Partnership**, and the **Gloucestershire Children and Young People's Coalition**.

Beyond formal governance, collaboration is also embedded in service delivery. For instance, **Ubico** is a local authority-owned company owned by all seven Gloucestershire Councils and others, delivering a range of environmental services across Gloucestershire and West Oxfordshire, including waste, recycling, and street cleansing.

We see no reason why this excellent strategic intent to collaborate should not continue with the two proposed unitaries. In addition to keeping Ubico going for the benefit of the whole county, other services where there is agreement to continue to provide a single shared service include:

- **Fire and Rescue** – We will create a single standalone Fire and Rescue Authority for Gloucestershire, with democratic representation from both Councils.
- **Archives** – Splitting physical and digital collections would be costly, disruptive, and face significant legal challenges, with no benefit to residents. A single, shared archive service protects access, quality, and value. Indeed, this approach is already taken as Gloucestershire Archives provides those services and facilities to all councils in the historic county of Gloucestershire, including South Gloucestershire unitary council.
- **Coroners** – Gloucestershire's coroner area boundary is already set by the Ministry of Justice under the Coroners and Justice Act 2009. Keeping a countywide service avoids unnecessary boundary changes and preserves specialist expertise.
- **Registrars** – A shared approach is key to financial resilience - especially with demand varying so widely across the county. Pooling resources ensures a sustainable, high-quality service for all.

Public service reform & preventative services

Local Government Reorganisation will be costly and disruptive in the short-term. Thereafter there is a choice between consolidating the current operating models with marginal gains on operating costs or realising the profound opportunity of change in which not only the structures, but services themselves, can be restructured and redesigned to best serve local communities.

We believe that LGR in Gloucestershire can be a moment for public service reform where a prevention-focused model can be embedded across the distinct and different populations in our city, and across the rest of the county.

Our proposal has been designed with a view to how each organisation can be focused on prevention, building trust and delivering growth for each authority.

There are distinctive challenges across the county footprint, be that a 15-year life expectancy difference in adjacent parts of Gloucester city, or the high levels of demand for transport connectivity and access to employment and services in the Forest of Dean and Stroud.

An approach that simply assumes a continuation of the status quo is likely to further entrench deprivation,

inequality and demand for acute services – having a negative impact on both the financial sustainability of organisations and the long-term life experiences of residents. Our NHS is changing through the Government's 10 Year Health Plan and our council services must too.

The Government set out the case for change clearly, saying "We can continue down our current path, making tweaks to an increasingly unsustainable model - or we can take a new course". We agree, and our approach aligns with the Government's view of how services can be reshaped and will work alongside the NHS' move from hospital to community, analogue to digital and sickness to prevention.

Our proposed model is one that shapes organisations around the needs of residents, rather than one that expects residents to navigate around and between professionals. Services are focused on local root causes of demand, rather than simply treating needs as they arise, supported by meaningful community networks building upon existing collaboration and partnerships.

This is a model that places prevention at its heart, moving staff and resources from services currently dispersed across tiers of government into one cross-cutting department that can provide holistic support to residents, from children to older adults, to increase resilience and reduce demand for statutory services. This approach does not stop when a resident requires long-term support, with strengths-based, independence-focused service delivery.

We recognise that resilient communities also require resilient local economies – and core to our future model is a growth function that can deliver on the ambitions that the two unitaries have for their respective areas – from culture, digital and regeneration in Gloucester, to green and renewable technologies in Stroud, Cotswolds and the Forest of Dean, and cyber/defence services in Cheltenham and Tewkesbury.

Our model is more than just reorganising the way services are delivered – but one that commits to achieving long-term outcome improvement for residents no matter where in the county they live.

All of this depends on solid foundations for the transition and transformation to new operating models that work across public sector organisations with communities, empower neighbourhoods and meet the true potential of this moment of change, reform and renewal for our county.

Assessment against Government Criteria

LGR Criteria	How this proposal meets those criteria
A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.	Under this proposal, a single tier of local government for the whole of Gloucestershire is achieved as two new unitary authorities are created from the current two-tier, seven authority system.
Proposals should be for sensible economic areas, with an appropriate tax base which does not create an undue advantage of disadvantage for one part of the area.	Each of the two unitary areas creates a sensible economic area with viable tax bases across both areas and each is designed to recognise the different economic roles, social needs, and service demands across Gloucestershire's varied geographies.
Proposals should be for a	The proposed boundary modification will tackle Gloucester

sensible geography which will help to increase housing supply and meet local needs.	city's historic under-bounding which has inhibited its growth potential and will enable it to drive significant housing growth alongside the growth identified for the rest of the county. By bringing together the rest of Gloucestershire into a single unitary council, this proposal enables the county to take a holistic approach to housing delivery, given the significant constraints that exist in different parts of the area e.g. in the AONB.
Proposals should be supported by robust evidence and analysis and include an explanation of the outcomes it is expected to achieve, including evidence of estimated costs/benefits and local engagement.	The development of the proposed service delivery models has been informed by a comprehensive engagement exercise including council leaders, and officers from across all seven councils. We have also assessed the financial implications of reorganisation and have estimated the costs, savings, and income implications of the proposal, using information from all councils as well as drawing on evidence and experience from other areas that have gone through reorganisation previously.
Proposals should clearly describe the single tier local government structures it is putting forward for the whole of the area, and explain how, if implemented, these areas expect to achieve the outcomes described.	Our proposal sets out how the new unitary councils will have the powers, capacity and leadership at the optimum spatial scale and proximity to residents to respond to the challenges and opportunities of each place. This will allow people to live better lives of their choosing, reduce demand on services, and contribute to Government priorities around growth and housing.
Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.	Our two unitary councils are the right size to achieve efficiencies, improve capacity and withstand financial shocks as they deliver the optimal balance between scale and responsiveness. Our model prioritises the delivery of high quality and sustainable public services above all else. It achieves efficiencies, strengthens organisational capacity, and creates financially resilient councils capable of withstanding shocks without importing the county's existing weaknesses into a single point of failure.
As a guiding principle, new councils should aim for a population of 500,000 of more.	The current total population of Gloucestershire is estimated at 669,380. The district of Gloucester has an estimated population of 138,598, however the proposed boundary modification would take the estimated population of that unitary council up to around 180,000, with growth in the near future estimated to take this over 200,000. The rest of Gloucestershire has an estimated population of 530,782.
There may be certain scenarios in which this 500,000 figure does not make sense for an area, including on devolution, and this rationale should be set out in a proposal.	While the populations of one of the proposed unitary councils is below the 500,000 figure, the economic, demographic, and service delivery distinctiveness for Gloucester City warrants a bespoke governance model. The case for unitarisation should not be built on strict adherence to population size, but on functional need and strategic opportunity, reflecting distinct opportunities and challenges faced by the two areas, and the imperative to align services with the real geography of people's lives. The (proposed modified) Greater Gloucester unitary council would be larger than or of a comparable size to nearly a quarter

	of all unitary Councils in England and Wales, most of whom are financially stable and delivering good or outstanding services to their communities.
Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money.	Our proposal sets out how efficiencies can be achieved through public service reform and redesign, moving to a preventative model of service delivery which creates efficiencies through reducing cost and reducing demand. Our modelling suggests that £4.04m of annual savings will be made by year 1, rising to £12.13m by Year 4, at which point the cumulative savings will outweigh any upfront investment. Uniquely, this is the only proposal being worked on for Gloucestershire which would not require the creation of a new parish council or councils for the city of Gloucester, with all of the associated risk of additional costs and precepting risk that that might incur.
Proposals should set out how we will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.	Reorganisation creates upfront transition and disaggregation costs, but we believe these are outweighed by the scale of recurrent savings. Our modelling demonstrates that by Year 6 there is projected to be £14.5m recurring annual savings and a cumulative net impact of around £35.1m across the two unitaries. Considering the efficiencies that are possible through both reorganisation and public service reform, we expect that we will be able to meet transition costs over time from existing budgets, including from flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.
Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.	The proposal sets out an optimum way to provide high quality public services to citizens, as reorganisation into two new unitary councils provides the opportunity to design the new councils from first principles to address the distinct challenges and opportunities of each place, while providing a platform for deep transformation that can yield savings. This will allow people to live better lives of their choosing (and so reduce demand), as well as maximising the contribution of each area to Government priorities such as prevention, growth and housing.
Proposals should show how new structures will improve local government and service delivery and should avoid unnecessary fragmentation of services.	The proposal shows how new structures will improve service delivery, as through developing delivery models for each new unitary we have sought to avoid unnecessary fragmentation or disaggregation of key services where a joined-up approach is the optimum solution.
Opportunities to deliver public service reform should be identified, including where they will lead to better value for money.	This proposal offers a great opportunity to deliver real public service reform by addressing the distinct challenges and opportunities in each place and developing distinct operating models that provide a platform for deep transformation and reform as well as yielding savings.
Consideration should be given to the impacts for crucial services such as social care,	As part of our proposals, service delivery models have been scoped for each new unitary for a wide range of public services including adult social care, children's social care and SEND,

children's services, SEND and homelessness, and for wider public services including for public safety.	housing development and management, homelessness, and a community-based early intervention and prevention model. The proposals also consider a range of place-based and enabling services such as planning, economic development, asset management, building control and highways.
Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.	All seven Gloucestershire Councils have worked together across all the dimensions of these proposals, including co-commissioning a single collaborative approach on engagement. The engagement outputs have built an informed understanding of the community's wants and needs from a new form of local government, and this input has been used to shape the model set out in this proposal.
It is for councils to decide how best to engage locally in a meaningful and constructive way and this engagement activity should be evidenced in your proposal.	All seven Gloucestershire Councils worked together to co-commission a single collaborative approach on engagement. A number of engagement channels and strategies were adopted by the specialist communications consultant engaged by the councils to reflect different geographies, urban/rural areas, and different communities, including those without access to digital channels. As part of the development of this proposal, Gloucester City Council also began an engagement with parish and town councils in the proposed area of Greater Gloucester, in addition to a collective engagement process that was undertaken with all parish and town councils across the wider county area.
Proposals should consider issues of local identity and cultural and historic importance.	This is the only proposal being put forward for Gloucestershire that truly respects and maintains the historic importance of the City of Gloucester and the county of Gloucestershire. Gloucester City has had a principal council overseeing the interests of its citizens for over 500 years, and this is the only proposal being put forward which maintains that dedicated governance. Equally, it does this in conjunction with a council for the rest of Gloucestershire, ensuring that the historic county boundary and identity is also retained.
Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.	The proposal includes evidence derived from the collaborative engagement process undertaken by and for all seven Councils through a specialist consultancy. Additionally, it contains information derived from specific engagement undertaken by Gloucester City Council with neighbouring parish and town councils relating to the Greater Gloucester unitary council.
Existing district areas should be considered the building blocks for your proposals, but where there is a strong justification more complex boundary changes will be considered.	A base case proposal, using the district of Gloucester boundaries for one unitary and the boundaries of the other five district councils for the other, is included and considered in this proposal in appendix A. However, in developing this option, it became apparent that it has some critical limitations, in relation to the effectiveness resulting from the size of the Gloucester unitary council and also the disbenefit to public service delivery that citizens of the wider urban area of Gloucester would experience being continued to be locked out of the city where they live and work. The remainder of this proposal therefore seeks and is modelled on a proposed boundary modification to bring the real communities of Gloucester together into a single

	unitary council. Whilst this would represent a one-off change of boundaries, this proposal argues that it represents the right long-term LGR decision for the people of Gloucester and Gloucestershire, given the scale and diversity of Gloucestershire and how and where our residents live their lives in 2025, compared to 1974.
New unitary structures must support devolution arrangements	This two unitary model for Gloucestershire, provides the perfect platform for moving to a Mayoral Strategic Authority, be it through joining an existing MSA such as the West of England Combined Authority (WECA), or through the creation of a new one, for instance alongside Herefordshire and Worcestershire. It enables balanced decision-making, supports shared priorities like infrastructure, skills, and housing, and ensures diverse voices inform regional governance. This structure fosters inclusive growth and operational resilience while maintaining local accountability and effective collaboration.
Where no Mayoral Combined County Authority is already established or agreed then the proposal should set out how it will help unlock devolution.	The county's devolution direction is the subject of ongoing conversations with MHCLG officials and neighbouring areas, but this two unitary model for Gloucestershire provides the perfect platform for moving to a Mayoral Strategic Authority, be it through joining an existing MSA such as the West of England Combined Authority (WECA), or through the creation of a new one, for instance alongside Herefordshire and Worcestershire.
Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.	Whereas a single County unitary council for Gloucestershire would dwarf all other existing members of WECA by population size, this two unitary proposal for Gloucestershire would provide much more compatible and appropriate size ratios compared to the other WECA partner authorities. The Greater Gloucester unitary council would be of a comparable size to Bath and North East Somerset and North Somerset Councils, and not far short of South Gloucestershire Council in size, providing an appropriate and democratically sympathetic counterbalance to those authorities. Equally, the Gloucestershire unitary council would be of an effective size and counterbalance to Bristol Council. Together, these two authorities would ensure that Gloucestershire residents as a whole would not be democratically, 'short-changed' should they be able to join WECA.
New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.	Specific structures for community engagement and neighbourhood empowerment have been developed for each unitary area, considering both existing town and parish councils and new democratic models and forms of community representation. In particular, there would be a much higher Councillor to Elector ratio in the Greater Gloucester unitary council than in other proposals being submitted for Gloucestershire, ensuring that residents are better represented and engaged and connected in democratic governance and their local government.
Proposals will need to explain	The engagement collectively undertaken by all seven

plans to make sure that communities are engaged.	Gloucestershire councils has helped develop a strong understanding of how communities want to be engaged in and with the new local councils. The proposal sets out plans to ensure all communities see themselves as co-creators and partners in the governance of their areas going forward.
Where there already arrangements in place it should be explained how these will enable strong community engagement.	The proposal does not propose the creation of any new town or parish councils, nor the abolition or merger of any existing ones. It does set out an exciting new model for parish and town engagement in the new unitaries, including the suggestion of a new committee of parish and town councils in the Greater Gloucester unitary council, and a new model of neighbourhood area management boards across the rest of Gloucestershire.

4. The Strategic Case

a. Our Vision and Ambitions for Gloucestershire

This is a once-in-a-generation opportunity to design local government around the way people live their lives.

The proposed model is sensitive to natural geography and is informed by economic evidence, building on travel to work areas and enhancing housing growth. This structure protects those most in need, reforming essential services, such as Adults and SEND which need to make improvement in order to meet the needs of vulnerable adults, Children and Young People with SEND. and ensuring that Children's services are focused on meeting the needs of the people who rely on them most.

It is focused on delivering the best outcomes for people, through a localised approach, relevant to demographic and geographical needs, which will ultimately lead to reduced cost to the public purse.

This model protects our heritage and prepares Gloucestershire for a secure and stronger, future.

This is a chance to create councils that reflect how people live, work and travel today - councils that are closer to their communities, financially sustainable and capable of delivering better outcomes.

The proposed two new unitary authorities are the following:

Greater Gloucester (GG) Unitary Council (population 178k)

Comprising of the current Gloucester City Council (132k) expanding into parishes that form part of the existing Districts of:

- Tewkesbury (34,000 in GG)
- Stroud (11,730 in GG)
- Forest of Dean (660 in GG)

GG will be a city-focused authority, but driving growth across the sub-region, with target housing growth likely to take its population over 200,000 by 2031. Gloucester is younger, more deprived and carries disproportionate need compared to the rest of the county, and this is the primary factor in its needing its own political leadership and council strategy, separate to that of the rest of the county. Though it has only 27% of the county's population, it accounts for over 35% of children's services demand. Gloucester has not achieved the same level of growth as South West cities like Bristol and Exeter (who make up 4 of the top 6 in the "Good Growth For Cities" report), in part due to its under-bounding caused by the constrained boundaries imposed on it since 1974.

This new expanded city focuses on the true lives of residents, reflecting the wider travel to work area than the current city boundaries and will allow the city to economically grow and fulfil its potential as the county's primary city hub. The expanded boundaries will allow those many thousand residents of the wider urban area to have a fully democratic influence over the city where they live and work, for the first time in decades.

Gloucester as an ancient Roman and cathedral city has a unique heritage in the County, this is an opportunity to build on, enrich and enhance that heritage, creating an authority that reflects both its history, its present

and builds for the future.

2. Gloucestershire Unitary Council (GU) (population c470k)

Comprising of the entire populations of:

- Cheltenham Borough Council (119k)
- Cotswold District Council (91K)

and part of the populations of:

- Tewkesbury Borough Council (61k in GU)
- Stroud District Council (109k in GU)
- Forest of Dean District Council (89k in GU)

GU provides scale and stability, with its older and more rural communities facing different challenges to those of the city, particularly in adult social care and transport connectivity. GU also anchors nationally recognised heritage and a powerful tourism economy. It has a major and regionally important urban hub in Cheltenham, leading the UK's cyber sector, along with locally important market towns and more rural communities.

Together these two councils replace complexity with clarity. They align services to real communities, unlock Gloucester's growth potential and secure long-term financial resilience for the county.

What we will achieve:

- **Reset services and improve outcomes** - particularly in Children's Social Care, SEND and Adults. Gloucester's higher demand will be met through hyper-local, prevention-first, family and community-level reform, while GU provides focus and stability for adult care in a rapidly ageing population.

- **Unlock city-led growth** - enabling Gloucester to perform on par with City peers across the country, while GU sustains county-wide prosperity through Cheltenham and market towns, garden towns, the Cotswolds and the Forest of Dean.

- **Deliver value for money** - a frontline-first redesign that reduces duplication and creates two sustainable strong councils, with wider economic value over time.

- **Strengthen local identity** - GG protecting Gloucester's cathedral city heritage, GU preserving county identity - the only one of the three proposals that does this.

- **Enable devolution** - aligning Gloucestershire with the West of England Combined Authority (our preferred option), creating two strong voices at the devolution table for Gloucestershire, giving the county more proportionate voting rights in the governance of the Combined Authority. A strong City voice, alongside the County, to counterbalance the voices of Bristol and Bath in the sub-region and to drive growth more equitably across the sub-region, securing devolved powers for housing, skills, transport and growth, in line with national government policy. This proposal would equally deliver a successful and proportionate Strategic Mayoral Authority if the county were to create a new one with other partners, such as Herefordshire and Worcestershire.

How we will lead:

- **Closer to communities, strong enough to deliver**: both unitaries will embed co-production in the development of services; giving parents, children and young people a say in how their local services are improved and developed. GG will focus on city need and growth; whilst GU will provide the scale and resilience to support a more rural county with key town hubs - a balanced model that meets core government criteria and delivers on wider government objectives while reflecting Gloucestershire's real geography and economy.

- **Evidence-led and outcomes-driven**: we will use robust analysis and benchmarking to track improved outcomes for vulnerable children and adults, healthier places and stronger economic performance.

- **Partnerships first**: deepen collaboration across health, policing, schools, VCSFE and shared service platforms (e.g. Ubico) to integrate delivery and reduce duplication.

Our ambition is simple: creating councils that are easier to understand, quicker to help and better at delivering - creating healthier communities, stronger growth and greater value for every resident and business in Gloucestershire.

b. Better Services for Residents

At the heart of this proposal is a simple ambition: to make services better, more responsive and more straightforward for the people who use them.

Clearer Responsibilities

Residents say the current structure — with two tiers of local government in most of Gloucestershire — is confusing and inefficient. By replacing seven councils with two, it becomes much easier to understand who is responsible for what.

Each new unitary council will be responsible for the full range of local services in its area — giving residents a clear and consistent point of contact.

This proposal ensures that the Councils are both of a scale which are financially sustainable and will promote better access to services and drive economic growth.

A Better Experience

No more being passed between county and district councils. No more duplication or delay. Whether it's applying for housing, accessing support, or resolving an issue in their neighbourhood, residents will deal with one council that knows their place and understands their needs.

The two proposed unitary authorities will be able to operate at scale and aggregate existing best practice demonstrated across all of the authorities, as well as join up interrelated services to deliver improved outcomes and experiences to our residents. For example, bringing together services like parking — currently

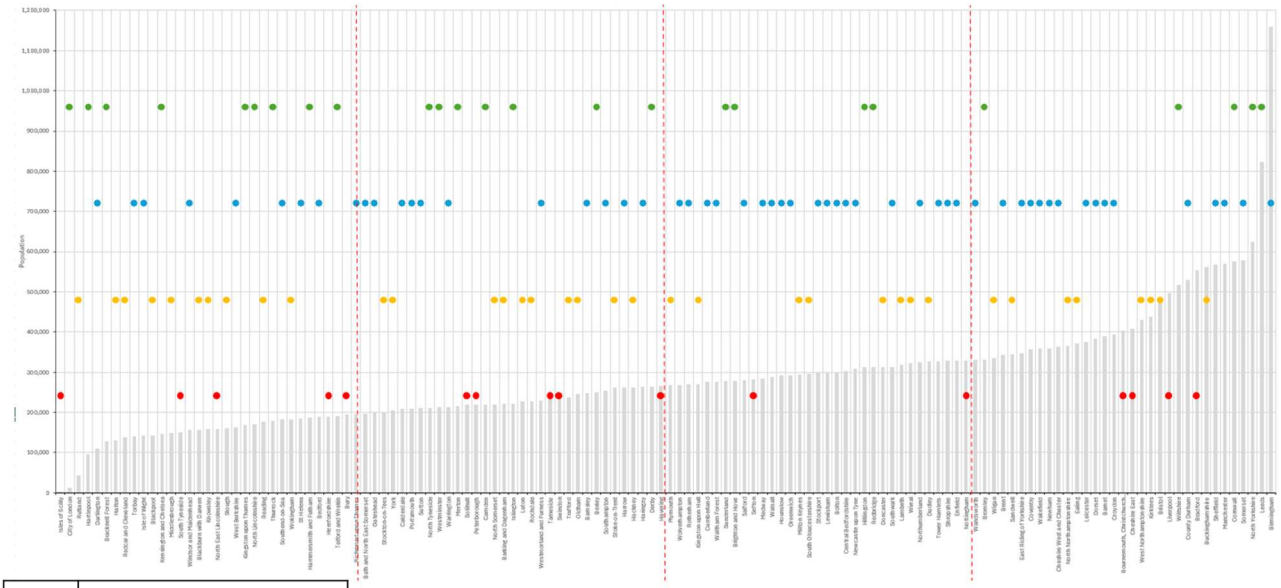
split between different tiers of councils — will simplify everyday experiences, reduce administrative waste and improve customer satisfaction.

This model allows services to be designed around people and create appropriate, place-based solutions to real need. It avoids the fragmentation of multiple districts, while tailoring delivery to the urban and rural needs. This will provide the opportunity to deliver better services, closer to the people it serves; leading to better outcomes for people and lower cost to the Councils and other public services.

Learning from elsewhere shows the value of this approach:

- County-wide footprints (including Gloucestershire's current structure) consistently fail to meet required standards.

Graph 4 – criteria: Potential: – ranking of current unitary by population size showing most recent Ofsted Children's Services inspection result headline conclusion



Green	Outstanding
Blue	Good
Orange	Requires improvement to be good
Red	Inadequate

Source: Gov.UK LA Inspection outcomes as at 31 March 2024

- The former Cumbria County Council (Westmorland and Furness Council and Cumberland Council) demonstrates the benefits of disaggregation well - Ofsted inspection has moved from 'Requires Improvement' in Cumbria in 2022 to 'Good' in both new Councils by 2024.

- Ubico and other shared service platforms already provide tested vehicles to deliver great and well-regarded services and operational efficiencies without undermining local responsiveness. The intention would be to continue with these shared service arrangements across the county wherever they make practical sense to do so.

For residents, this proposal will bring:

- A genuine reset of failing services

- Simpler, more responsive access to services

- Stronger local accountability - residents know who is responsible and how to hold them to account

The GG + GU proposal ensures services are closer, better and fairer - designed around real communities and delivered with a frontline-first approach.

Enabling Better Partnerships

One crucial foundation of this model is stronger partnership working that suits the place it serves. The two unitaries will work with the NHS, schools, policing, VCSFE organisations and parish councils to integrate delivery. This will reduce duplication, build trust and strengthen the culture of collaboration that is needed across the county. Most of the VCSFE organisations in Gloucestershire are hyper-local and are built and run bottom-up from the areas and communities in which people live. For too long, they have, through a lack of scale, been denied the opportunity to deliver valued services in their locality as commissioners have sought county-wide approaches. Why would a local community group based in Kingsholm in Gloucester be interested in working with the Council to provide a Meals On Wheels service in rural Forest of Dean? A more nuanced and localised approach to partnership working will enable a greater civil partnership and engagement in service delivery, which has been proven to deliver better and more sustainable outcomes.

Clearer and simpler strategic leadership across the full range of local services will better enable us to improve and manage the health and care of our local populations. There will be stronger links between leisure services, public health and local communities, to ensure there is a more joined-up and preventative approach between planning, housing, social care and education, enabling the delivery of better outcomes for all.

Accessible and Inclusive

Our new councils will combine the best of modern digital delivery with a strong local presence. Residents will be able to access services online - but also through local hubs, face-to-face support and outreach, especially for those facing homelessness or vulnerability.

Simplicity, inclusion and user-focus will be at the heart of service design - making it easier for everyone to get the help they need, when they need it.

Examples of frontline services that could be transformed include:

Area	Current Context & Pressures	Opportunity through this LGR Proposal
Adult Social Care	Adult Social Care faces rising and uneven demand: with high numbers of complex supported-living cases in Gloucester and the West of the county, and growing older people's residential and nursing care needs across the whole county. The 85+ population is projected to rise by 84% by 2043. Services remain fragile - rated "Requires Improvement" by CQC in 2025 — with workforce shortages and a £13.9m savings programme struggling to keep pace with demand.	LGR enables services to strategically restructure, to reflect place and to focus on prevention and promoting independence. GG will focus on complex supported living, safeguarding, and prevention where demand is most acute. GU will provide stability and scale, building Extra Care housing, strengthening domiciliary care, and investing in prevention to manage long-term demand. Together, the two councils will build an improved, integrated, place-based approach to commissioning for vulnerable adults. The new councils will reduce reliance on high-cost placements, improve resilience, and support adults to live independently.
SEND	Gloucestershire is on a focussed	LGR allows a needed reset in SEND delivery.

	improvement journey. It is one of the least well-funded counties in England, a member of the F40. The Area SEND inspection in Dec 2023 identified challenges, with the area achieving judgment 2. There is a Local Area SEND and Inclusion Improvement Plan in place, recognised as having impact by the DfE and NHS England. The white paper coming in late 2025/early 2026 will detail national SEND reforms and changes to the schools national Funding Formula which will impact future plans and working.	GG will focus on intensive SEND support and inclusion in areas of highest demand, while GU will expand county-wide sufficiency through new specialist places and workforce planning. Together, the councils can implement place-based models, which will simplify the process for children and families. Local working will enable stronger partnerships with VCSFE groups, education providers and parent/child representative committees. A focus on co-production will enable children, young people and families – those most affected by these services – to have a voice in how they function. This partnership model will enable improved place-based working which will reduce delays, strengthen inclusion, improve outcomes and deliver sustainable SEND provision.
Children's Services	Children's Services were previously rated inadequate in 2017, and have improved since, with the 2025 Ofsted report citing 'Significant progress' and highlighting a more confident and child-focused service, with better outcomes for children and families. The latest inspection has delivered a positive outcome, but still comes on the back of years of rising referrals, significant capacity pressures, and fragile workforce capacity. Since 2015, there has been a 63% increase in children in care and around 8,000 referrals annually, with the highest safeguarding demand in Gloucester and the Forest of Dean. Education services face a £78m high needs deficit, long waits for EHCPs, and shortages in specialist provision. Progress is recognised but capacity challenges remain under the current county-wide model.	LGR enables services to reflect local needs, and the new unitaries will be able to build on recent positive results with more tailored localised approaches, in order to achieve consistently outstanding ratings. GG will focus on safeguarding, youth services and Alternative Provision, with Family Hubs embedded as local prevention gateways. GU will sustain statutory education and children's services across the county, ensuring school place sufficiency, fostering and adoption capacity. Together, the councils will deliver earlier intervention, reduce out-of-area placements, contain costs, and improve outcomes for children and families.
Homelessness & Housing	Rising homelessness concentrated in Gloucester where most support services are concentrated, severe pressures in temporary accommodation, fragmented responsibilities between county and districts, future funding cuts and limited affordable housing supply.	Localised accountability for homelessness and Private Rented Sector enforcement in Gloucester; county-wide leadership on housing strategy, land use and affordable supply; prevention-first model to contain costs and improve outcomes.
Economic Development	Economic development functions are currently fragmented across county and district councils, with overlapping responsibilities for growth hubs, inward investment, regeneration and skills. Demand for business support, inward investment and decarbonisation funding is high, but capacity and resources are	Moving from seven councils to two unitaries will create clearer leadership and reduce duplication in strategy, governance and business support. GG can focus on regeneration, inclusive growth and inward investment in Gloucester City, while GU provides county-wide scale for business support, skills and sector

	stretched. Pressures include reliance on short-term funding streams (UKSPF, REPF), grid and infrastructure constraints and limited capacity in local teams. Delivery varies widely between districts, creating inequality of access.	development. A unitary model strengthens resilience, improves access for SMEs and enables coherent delivery of transport, climate and economic strategies together. This ensures both local responsiveness and county-wide consistency.
Waste collection, disposal and recycling	Waste services are split: the county manages disposal while districts lead on collection. Ubico creates a successful foundation and has created efficiencies and savings. All county and districts commission Ubico, creating shared resilience and continuity. The system faces rising costs from decarbonisation and fleet replacement, pressures on HRC capacity, variation in local policies and new legislative duties. Recruitment, retention and inconsistent resident experience add further strain.	LGR can unify waste and environmental services further under a more consistent larger scale model. Maintaining Ubico's broad footprint ensures smooth transition and operational resilience. A single framework enables harmonised policies, reduced duplication and stronger investment in decarbonisation. This creates a more efficient, integrated service aligned to countywide climate and sustainability goals while still allowing local flexibility.
Development and Regeneration	Delivery is fragmented across county and districts, with a mix of in-house, arms-length and external models. The remit spans highways and transport, housing, regeneration, economic development and strategic infrastructure planning. Pressures include rising build costs, housing demand, viability challenges and limited officer capacity. Statutory consultee functions (e.g. highways, flood, heritage) are stretched, while regeneration and housing projects face resource and financial constraints.	Moving from seven councils to two creates the chance to simplify planning, regeneration and infrastructure. A single strategic approach can streamline developer contributions, align policies and strengthen capacity to deliver complex regeneration and housing programmes. Integration reduces duplication, embeds consistent consultee roles and supports investment attraction through a strong county-wide identity.
Public protection, licensing & environmental health	Public protection services (environmental health, licensing, food safety, health & safety and pollution control) are delivered at district level, with the county providing oversight on specific areas (e.g. Trading Standards, Fire & Rescue). Councils face high demand for regulatory services, increasing complexity in licensing and enforcement pressures from issues such as food hygiene, private rented housing standards and community safety. Recruitment and retention of qualified staff (EHOs, licensing officers) remains a challenge, with workloads often reactive and shaped by legislative changes.	Moving from 7 councils to 2 new unitaries offers the chance to consolidate environmental health and licensing functions, creating stronger, more resilient teams. It reduces duplication, builds consistency in enforcement and licensing and allows specialist expertise to be shared across wider areas. The two-unitary model provides the scale to modernise digital systems and improve customer access, while keeping services close enough to communities to remain responsive to local issues.
Arts, culture and heritage	Arts, culture and heritage are split across county and districts. The county leads cultural education, while districts run museums, theatres, festivals and heritage assets. Provision is vibrant but uneven: major centres carry most of the infrastructure and visitor economy, while smaller districts struggle with capacity.	LGR can create a more resilient system for culture and heritage, rightly aligned to place. GG and GU can each create a unified framework to align arts with health, education and economic growth, reduce duplication and secure long-term investment. This will help sustain venues, protect historic assets, expand access in rural and urban areas and use heritage as a driver of

	Venues face financial fragility, reliance on short-term funding and high maintenance costs for historic buildings.	inclusion, prevention and growth.
Sport, physical activity and wellbeing	Leisure and wellbeing services are fragmented across districts, with ageing facilities, high maintenance costs and inconsistent investment models. Funding pressures and rising demand for health and wellbeing services add strain.	LGR enables a unified leisure and wellbeing framework, aligning with public health, reducing duplication and supporting sustainable facilities. Integration offers clearer accountability, stronger prevention focus and better use of resources.
Digital, Data & Technology	Digital services are fragmented across seven councils with multiple systems, contracts and suppliers. Duplication in platforms (Microsoft 365, planning systems, ServiceNow, CRM/ERP) creates inefficiency, high costs and inconsistency for residents. Shared service models (e.g. Publica) add complexity. Cyber resilience is uneven, contract end dates misaligned and recruitment of skilled staff is difficult.	Moving to 2 unitaries allows consolidation of contracts and systems, cutting duplication and costs. GG and GU can each build modern, resilient digital estates, with standardised platforms for finance, HR, planning and customer services, collaborating where it makes sense to do so. For instance, a unified model strengthens cyber security, data sharing and digital inclusion, while giving scale for investment and supplier leverage. Residents benefit from consistent, accessible digital services, while local priorities are still reflected through flexible delivery.
Planning	Planning is split across county and district councils, with the county handling minerals, waste and transport and infrastructure planning, while districts deliver development management, local plans and building control. Services face recruitment shortages, housing delivery pressures, multiple statutory deadlines (e.g. Local Plans, Building Safety Levy) and fragmented IT/planning systems. Transition experience elsewhere shows challenges around harmonising policy frameworks, staff retention and avoiding duplication.	LGR offers a chance to integrate planning under two coherent units (GG and GU), streamlining local plan production, policy frameworks and building control functions. This would reduce duplication, enable stronger workforce resilience, align IT and digital planning systems and deliver consistent enforcement. It also strengthens the link between planning, housing and infrastructure delivery, while still maintaining local identity and responsiveness through area-based committees or boards.

Case Study: Ubico Ltd

Ubico is a local authority owned company (Teckal) operating across Gloucestershire and West Oxfordshire. It delivers high quality, front line environmental services to over 300,000 households, which support and improve our local communities to remain clean, green and pleasant places to live and work.

The company was founded in 2011, by shareholder partners Cheltenham Borough Council (CBC) and Cotswold District Council (CDC). The company achieved strong growth in its first ten years and now provides environmental services to all councils in Gloucestershire, and West Oxfordshire, with eight local authority shareholders since 2021.

Ubico works closely with its shareholder councils to realise environmental services that align with their objectives. Each service is designed around the council and communities it serves, while also offering our partners the benefit of learned experience that leads to realising synergies through greater standardisation. The individual character and requirements of local geographies are embraced and respected, meaning services are genuinely flexible in the face of evolving local authority needs.

The governance model associated with the teckal model ensures that explicit agreements on how services are run are in place; the councils as shareholders are in charge.

Ubico also adapts its approach to respect partners' appetite for delegated authority, and actively looks for partner benefits, as it is not motivated by driving company profit; as a teckal organisation, it is local authority owned and shareholder councils only pay the cost of operation, any savings being directly invested in improving frontline services for residents.

The growth in the number of local authorities partnering with Ubico since the company began service delivery in 2012 has consolidated its position as a resilient provider of environmental services, with a clear focus on long-term improvements. It means Ubico is able to leverage the full buying power of the network when sourcing products and services; improving the negotiating position for each local authority. It also provides a shared test-bed for investments in industry leading technology, equipment and working practices which raises standards across the region, influencing the scope of shared resources and service delivery.

c. Delivering Value for Money

Creating two councils, in the place of seven, will save money, reduce duplication and ensure more of every pound is spent where it matters and spent well.

The GG + GU model is financially sustainable for the long term. Within a few years, GG would be larger in size than nearly a quarter of existing unitary councils across England, the vast majority of whom are successful and financially stable. GU will provide stability, with a population that will likely soon exceed 500,000

Baseline data – current unitary by population quartile

Council	Population	Council	Population	Council	Population	Council	Population
Isles of Scilly	2,281	Bath and North East Somerset	195,618	Plymouth	266,862	Wandsworth	329,035
City of London	10,847	Gateshead	197,722	Wolverhampton	267,651	Bromley	329,578
Rutland	41,151	Stockton-on-Tees	199,966	Rotherham	268,354	Wigan	334,110
Hartlepool	93,861	York	204,551	Kingston upon Hull	268,852	Brent	341,221
Darlington	109,469	Calderdale	207,699	Cumberland	275,390	Sandwell	344,210
Bracknell Forest	126,881	Portsmouth	208,420	Waltham Forest	275,887	East Riding of Yorkshire	346,309
Halton	128,964	Sutton	210,053	Sunderland	277,354	Coventry	355,600
Redcar and Cleveland	137,175	North Tyneside	210,487	Brighton and Hove	277,965	Wakefield	357,729
Torbay	139,479	Westminster	211,365	Salford	278,064	Newham	358,645
Isle of Wight	140,794	Warrington	211,580	Sefton	281,027	Cheshire West and Chester	361,694
Blackpool	141,574	Merton	214,709	Medway	282,702	North Northamptonshire	363,408
Kensington and Chelsea	146,154	Solihull	217,678	Walsall	286,105	Ealing	369,937
Middlesbrough	148,285	Peterborough	217,705	Hounslow	290,488	Leicester	373,399
South Tyneside	148,667	Camden	218,049	Greenwich	291,080	Dorset	383,274
Windsor and Maidenhead	154,738	North Somerset	219,145	Milton Keynes	292,180	Barnet	389,101
Blackburn with Darwen	155,762	Barking and Dagenham	219,992	South Gloucestershire	294,765	Croydon	392,224
Knowsley	157,103	Islington	220,373	Stockport	297,107	Bournemouth, Christchurch and Poole	401,898
North East Lincolnshire	157,754	Luton	226,973	Lewisham	298,653	Cheshire East	406,527
Slough	159,182	Rochdale	226,992	Bolton	298,903	West Northamptonshire	429,013
West Berkshire	162,215	Westmorland and Furness	227,643	Central Bedfordshire	301,501	Kirklees	437,593
Kingston upon Thames	168,302	Tameside	232,753	Newcastle upon Tyne	307,565	Bristol	479,024
North Lincolnshire	170,042	Swindon	235,657	Hillingdon	310,681	Liverpool	496,770
Reading	174,820	Trafford	236,301	Redbridge	310,911	Wiltshire	515,885
Thurrock	176,877	Oldham	243,912	Doncaster	311,027	County Durham	528,127
Southend-on-Sea	180,915	Barnsley	246,482	Southwark	311,913	Bradford	552,644
Wokingham	180,967	Bexley	247,835	Lambeth	316,812	Buckinghamshire	560,409
St Helens	184,728	Southampton	252,689	Wirral	322,453	Sheffield	566,242
Hammersmith and Fulham	185,238	Stoke-on-Trent	259,965	Northumberland	324,362	Manchester	568,996
Bedford	187,466	Harrow	261,185	Dudley	324,969	Cornwall	575,413
Herefordshire	188,719	Hackney	261,491	Tower Hamlets	325,789	Somerset	576,852
Telford and Wrekin	188,871	Haringey	261,811	Shropshire	327,178	North Yorkshire	623,501
Bury	194,606	Derby	263,490	Enfield	327,224	Leeds	822,483
Richmond upon Thames	194,894	Havering	264,703	Nottingham	328,513	Birmingham	1,157,603

Efficiencies will come from:

- Streamlining management and back-office functions, creating leaner organisations
- Reducing duplication across layers of governance
- Maintaining and drawing greater efficiencies from existing and proven shared service models like Ubico
- Unlocking savings from earlier intervention and prevention - to reduce high-cost demand in children's and adults services.

Transition costs will be carefully managed:

- We expect there to be lower transition costs than a single-county model, due to lower redundancy levels more than offsetting and disaggregation costs
- A frontline-first approach will enable transition to be achieved without over-reliance on expensive consultants

Evidence from elsewhere supports this model:

- Single-county unitary authority proposals have consistently under-estimated transition costs, over-promised efficiency and successor authorities have struggle to sustain improved outcomes
- Multi-unitary models like Dorset and Cumbria have achieved better outcomes in high-cost services such as children's and adults, alongside reduced costs

- The creation of two unitaries in Northamptonshire demonstrates that splitting responsibility can lead to more sustainable finances and improved focus on services

The result is councils that are simpler and financially sustainable, protecting frontline services, reducing bureaucracy and enabling reinvestment into priorities such as vulnerable children, healthier communities and unlocking growth.

d. A Stronger Voice for Gloucestershire

Gloucestershire's current two-tier system, with seven councils, brings inefficiencies and restricts growth. Services are duplicated, accountability is blurred and decisions are slowed by competing priorities. The result is a county which is not able to have a clear and confident voice in regional and national forums.

The proposed model replaces seven competing voices with two strong, complementary councils that are clear, accountable and representative. Together, they will amplify Gloucestershire's influence locally, regionally and nationally.

- Greater Gloucester will give this ancient cathedral city the leadership role and growth capacity it has lacked. Today Gloucester is restricted compared to South West peers such as Bristol, Exeter and Swindon. A dedicated urban authority will ensure Gloucester has the same standing as other leading cities, able to advocate directly for housing, infrastructure, jobs and investment.

- A Gloucestershire Unitary Council will provide balance, scale and stability for the county's towns and rural areas. It will sustain prosperity and amplify the county's economic and cultural voice, while protecting nationally recognised heritage and assets, such as the Cotswolds and the Forest of Dean.

This balance ensures that both the urban and rural strengths of Gloucestershire are represented clearly and ends the duplication and inefficiency caused by the current two-tier system.

Joining a Mayoral Strategic Authority

Gloucestershire is actively exploring three strategic partnerships to the north, south, and east. Of these, we found each offer unique opportunities to accelerate growth and influence:

- West of England Combined Authority (WECA)
- Herefordshire and Worcestershire
- Swindon and Oxford

1. West of England Combined Authority (WECA)

- **Why**: Existing governance, metro mayor, statutory compliance, strong sectoral fit (advanced manufacturing, cyber, green tech), and clear commuting / economic flows; existing regional partnerships across arts, culture, health, and the broadest range of services of all options; similar urban / rural profile, reflecting shared challenges in housing and transport planning.
- **Risk**: Gloucestershire risks becoming a junior partner unless it defines a distinctive role (e.g. agri-tech leader completing a 'whole of tech' future economy).

WECA provides the high-growth innovation engine, Gloucestershire complements the ecosystem with agri-tech and natural capital.

2. Herefordshire and Worcestershire

- **Why**: Close match in rural economy, heritage, and agri-tech; natural cultural legacy fit; scope for Gloucestershire to play a leading role in innovation and scaling up; slightly under population threshold, but culturally congruent and offers Gloucestershire leadership space.
- **Risk**: Limited digital / tech capacity in partners and weaker alignment with national reform priorities.

Rooted in shared rural economy and heritage, with Gloucestershire as a natural partner to inject innovation and scale.

3. Swindon and Oxfordshire

- Why: Strong in R&D, life sciences, AI, and clean tech; good synergies in advanced manufacturing and cyber, but requires completely new governance; has weaker cultural alignment, and less short-term integration with Gloucestershire's rural and health economies.
- Risk: Longer-time horizon to deliver; innovation is research-led and urban, less aligned with Gloucestershire's wider economic identity; very few established regional partnerships.

Offers long-term potential in global-facing R&D and science but less immediate and less place-congruent.

Gloucestershire has the assets and ambition to contribute strongly within any of the potential partnerships. WECA provides the most immediately deliverable and policy-aligned option, while the Herefordshire and Worcestershire option offers an alternative in which Gloucestershire could play a leading role. The partnership with Swindon and Oxfordshire remains a credible longer-term prospect, particularly for research-led collaboration, but is less immediately aligned to Gloucestershire's wider economic and governance priorities.

Why this matters:

Through LGR and further devolution, Gloucestershire can unlock the tools to drive a high-growth, resilience-focused economy and smarter services for residents.

- The government's clear policy direction is to extend deeper devolution deals through Mayoral Combined Authorities

- By joining a Mayoral Strategic Authority, Gloucestershire will access devolved powers over housing, skills, transport and economic growth - aligning with national priorities. This will provide the scale and credibility needed to secure investment and give Gloucestershire a stronger representation on the issues that matter to its residents

- A two-unitary model strengthens Gloucestershire's voice in these partnerships: coherent, financially sustainable councils with clear leadership. A single County unitary would potentially reduce the county's vote and voice in the Strategic Authority and would also mean that Gloucestershire was the largest constituent Council, which has the potential to unbalance existing or future relationships.

- Devolution would allow Gloucestershire to power growth through innovation: using devolved economic powers to create the Severn Resilience Corridor, bringing together cyber, advanced manufacturing, agri-tech, and clean energy. This will attract major private investment, generate high-value jobs, and cement Gloucestershire's role as a national growth engine.

- Devolution would allow Gloucestershire to strengthen resilience for the 21st century: with greater control over housing, health, skills, and transport, Gloucestershire can deliver joined-up solutions

for climate resilience, energy security, and sustainable food systems.

- Devolution would allow Gloucestershire to put data to work for residents: allowing us to integrate transport, housing, health, and utilities in real time. This will reduce duplication, cut costs, and provide residents with more personalised, responsive services, from flood alerts to smart mobility and integrated healthcare.

With two councils, Gloucestershire will be stronger in its representation. GG will lead as a confident, ambitious city authority, sitting alongside Bristol and Bath; GU will sustain county-wide prosperity and protect heritage. Together they will give Gloucestershire the stronger, clearer and more confident voice it needs, ensuring that the county is not a bystander, but a leader with an equal say in shaping the future of the region.

e. Unlocking Growth & Innovation

Gloucestershire has huge economic potential - but it is not yet being realised. Gloucester, in particular, is younger, more diverse and faces higher levels of need than the county average, yet has the greatest potential to drive inclusive growth. With the right leadership, geographic boundaries and tools, it can perform on a par with peer cities like Exeter and Bristol.

This model will unlock that potential:

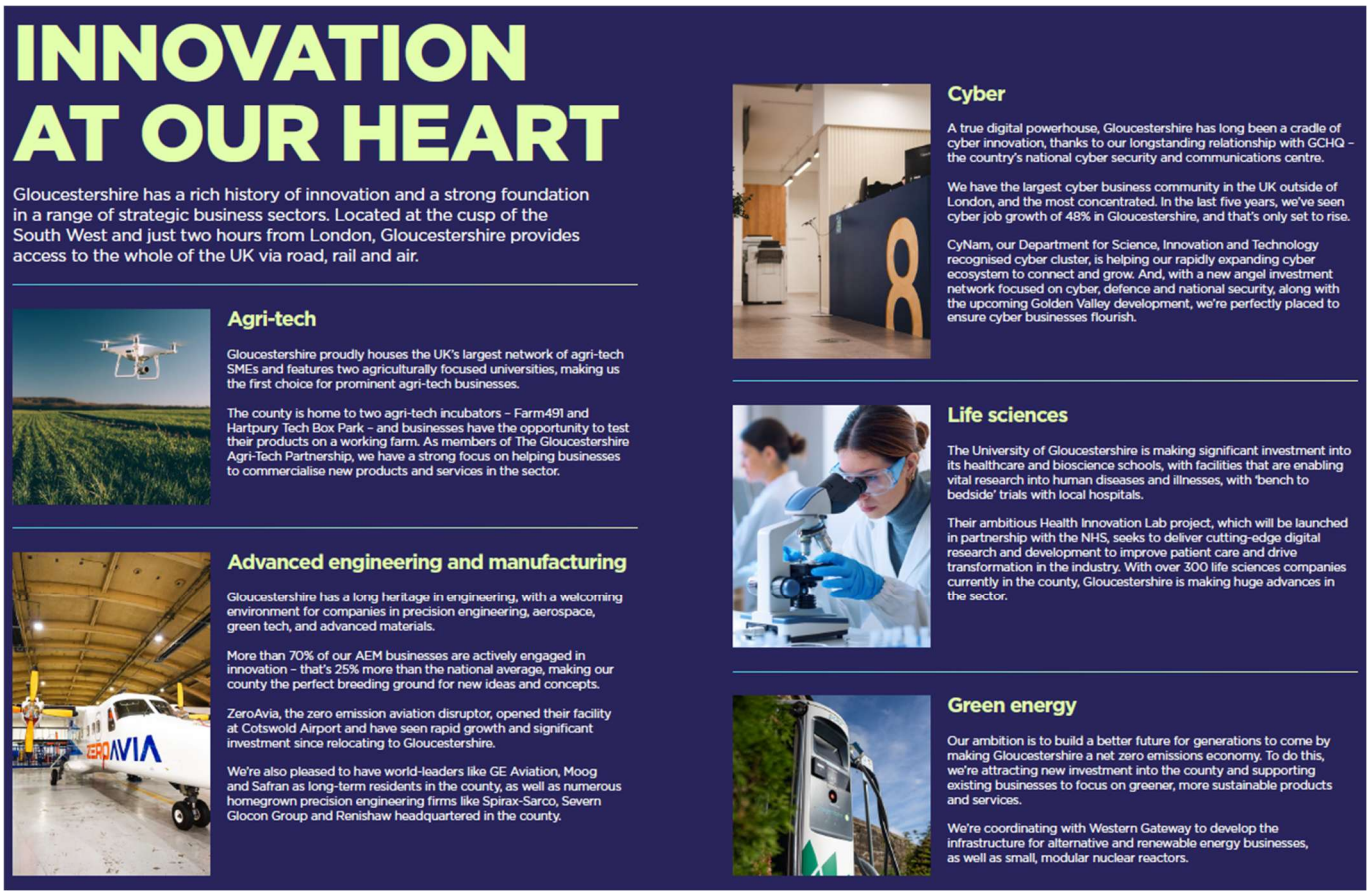
- Greater Gloucester will act as a growth hub for the county. Its assets - a cathedral city with world-class heritage, a strong cultural and sporting identity, regenerated docks and quays, its increasing prominence as a University City and a growing service economy - will be matched with governance able to deliver investment and growth at scale. Gloucester City Council has a reputation for being one of the most innovative areas in stimulating and delivering commercial and residential growth and regeneration.

- Hi-tech businesses such as Safran will be headquartered within the new Greater Gloucester area, whilst medical science research and opportunities being pioneered by the University of Gloucestershire will cover across both councils.

- A Gloucestershire Unitary Council will sustain and strengthen the wider economy: market towns, rural industries, green and visitor economy in the Cotswolds and Forest of Dean, bolstered by the UK's centre of cyber technology in Cheltenham. It will ensure balanced prosperity across the whole county.

This model aligns economic strategy with how people actually live and work. It connects housing, transport, planning and skills to business needs, removing duplication and enabling joined-up leadership.

Gloucestershire’s track record of innovation shows what’s possible:



The voluntary and community sector is also a growth partner. With over 4,000 organisations and strong networks like Know Your Patch, Gloucestershire's VCSFE sector connects communities and builds resilience and will play a central role in inclusive growth.

Evidence backs this approach. The Case for Cities report (In Appendix B) highlights the potential for Gloucester to achieve the same growth as its peers, while wider analysis shows that city-led growth drives regeneration, improved social outcomes and stronger local economies.

With two councils that are simpler, accountable and strategically aligned, Gloucestershire will be positioned to unlock innovation, attract investment and deliver growth that is both sustainable and inclusive.

f. Building Healthy Communities

Why Change is Needed

LGR is not only about fixing fragile services but about enabling healthier, fairer communities. Today responsibility for housing, leisure, culture and public health is split across seven councils, leaving no single body accountable for wellbeing outcomes and preventing a joined-up, localised response which facilitates true change.

Adults' and SEND services are struggling nationally, with rising demand and costs. Locally in Gloucestershire, an ageing population, rural isolation and workforce shortages stretch adult services, with

demand set to overwhelm budgets and capacity.

The pressures are place-specific. Gloucester has a quarter of the county's population but over a third of children's social care demand. Its younger, more deprived communities drive high levels of safeguarding need and homelessness. Rural Gloucestershire faces a different challenge: an accelerating ageing population, fragile care markets and entrenched health inequalities. The current county-wide structure is not designed around the very different needs of Gloucester City and the wider county.

Without reform, demand and costs will continue to rise, while families will continue to face poor outcomes and delays, health inequalities will widen and accountability will remain blurred. A reset and fundamentally different approach is needed.

The Opportunity with Two Councils

Two new councils create the opportunity to integrate many of the wider determinants of health - from housing and planning to leisure, culture and environment - within a single local framework, alongside children's and adults services.

The proposed two councils, with the right size and focus, will build around the true needs of people and place. Unlike the current county-wide system, they can design services around fundamentally different communities, embed support locally and act earlier to stop problems before they escalate.

- Greater Gloucester with its younger demographic will have a great focus on children's and youth services, SEND, homelessness, health inequalities and regeneration - tailored to a younger, more deprived, high-growth urban population.

- Gloucestershire Unitary Council with its older and more rural demographic can have a real focus on adult social care and rural services, ensuring stability, resilience and sustainable care for an ageing population.

Both will embed prevention-first approaches in partnership with the NHS and ICS, ensuring that better health and wellbeing are designed into every service, not left as an afterthought.

Together, they will deliver:

- **Prevention-first mindset** - services embedded at family and neighbourhood level, reducing crisis demand.

    - **Family and community-level delivery** - shaped around distinct local needs, with support provided through schools, GPs, neighbourhood teams and local partners, reducing reliance on high-cost crisis interventions.

    - **Earlier help for children and families** - more effective early intervention will reduce the number of children entering care, improve SEND support and strengthen family resilience.

    - **Independence for adults** - closer links between housing, social care and health will expand supported living and Extra Care options, helping older and disabled people live

independently for longer.

- **Local accountability** - smaller councils are more responsive and residents know who is responsible for services in their area, strengthening trust and oversight.
- **Faster responsiveness** - councils able to react quickly to local issues and emergencies.

- **Integrated partnerships** - working with NHS partners, policing, schools, VCSFE organisations and parish councils ensures services are designed around people's lives and communities rather than institutional boundaries.

A Prevention-First Model

A prevention-first approach is the only sustainable way to improve outcomes and protect resources. Without a shift to prevention, rising demand in both children's and adults' services will overwhelm budgets and workforce capacity.

Evidence from other reorganisations, or where district councils' functions have been used in a prevention-first approach, demonstrates this model can succeed.

CUMBRIA: TWO SEPARATE CHILDREN'S SERVICES FROM DAY ONE

Westmorland & Furness Council

In 2023, six district councils and Cumbria County Council were reorganised into two unitary councils, **Cumberland Council and Westmorland and Furness Council**. Both councils are sparsely populated, covering very large areas.

Westmorland and Furness is the third largest authority in England and Wales by geographic area. It has a small population of whom 15% are children aged 0 to 15 across a rural geography. Key aspects of its approach is:

- **Strong alignment** between the **Children's Plan and council priorities**.
- Priorities are driven through **engagement with children and families**.
- Adoption of an **early intervention and prevention Family Help locality offer** implementing a **partnership model of delivery**, which includes Health partners, Police, Education, Local Authority, Voluntary and Community sectors working together to identify needs within families as early as possible.
- **Clear governance arrangements** through a Family Help programme Board, Safeguarding partnership, Strategic Education Alliance and a SEND partnership Board.

LEARNING FROM THIS APPROACH IS:

- **Common purpose for children and families** across the council and with partners is essential.
- Build in **engagement with children and families** from initial planning onwards.
- **Respond to what you're hearing** from them.
- Understanding **constancy, focus and determination to drive forwards improved outcomes for children is critical**.
- Using **community and partnership support** to help deliver coordinated, connected and integrated family help through **place-based family help hubs** which include both a physical and virtual offer.
- **Communicate** constantly and effectively about plans and priorities.

A year after inception, Ofsted highlighted the effectiveness of its approach to delivery, with a particular emphasis on the:

- Firm establishment of **a unique identity** for the new unitary children's services.
- Council's **relentless drive for improvement**.
- **Shared vision for children across the workforce and with partners** which is supporting service improvements.
- Ways in which it **listens and acts on what children say matters to them and their families**.
- Swift action to **recruit to and stabilise the workforce**.

Close, connected communities, coupled with strong, passionate and ambitious leadership, will give children the best possible start in life and provide good support and services to them and their families.

Source: Building The Best Places For Children And Families: Children's Services In New Unitary Councils, Staff College/DCN report, 2025

CASE STUDY: Leeds and hyper local ASC approach

Leeds City Council, in collaboration with residents and partners, is implementing a 'hyperlocal' approach to social care work by focusing on community engagement, personalised services, and co-design with local partners. This approach aims to create more effective, equitable and sustainable social care services that meet the unique circumstances of users and their locality. Key features of this approach are:

Community-led support

- In Leeds, ASC has adopted the principles of community-led support, where local communities are actively involved in shaping and delivering services.
- This involves co-production, where people who use services, their families, and community members work together with professionals to develop and improve services.
- The focus is on building trust, empowering individuals, and focusing on their abilities.

Strengths-based working

- Leeds emphasises strengths-based working, which focuses on building on people's existing strengths and abilities, rather than primarily focusing on their needs or deficits.
- This approach is aligned with the principles of community-led support and co-production.

Thriving communities

- Leeds' approach emphasises the importance of thriving communities, which are characterised by good health, wellbeing, and strong social connections.
- This involves investing in community building, social infrastructure, and supporting people to access opportunities for education, employment and leisure.
- The goal is to create environments where people can live healthy and happy lives.

The hyperlocal approach has also been adopted by the Local Care Partnership (LCP) with a strong focus on bringing together health and social care providers, community organisations, and local people to work collaboratively on shared goals. The partnerships aim to improve outcomes, reduce inequalities, and respond to the unique needs of each locality. The programme is using local recruitment as a lever to engage local residents in working in the health and social care sector as a vital part of the local economy.

- The Leeds Health and Social Care Hub aims to make the region a natural destination for people seeking careers in health and social care, and for organisations looking to establish or expand.
- It focuses on making health and social care a career of choice for local residents, creating employment opportunities, and addressing health inequalities.
- The hub promotes collaboration between public, private and third sector organisations to achieve these goals.
- Leeds Community Healthcare NHS Trust has successfully recruited staff from local communities by directly engaging with them, rather than relying solely on online job postings.
- This approach has led to a more diverse workforce, including people who may not have previously considered joining the NHS.
- The trust has worked with local organisations and charities to reach individuals who may have barriers to accessing online job applications, such as digital poverty.

Source: The power of prevention and place in new unitary councils, Impower, 2025

This model will put prevention at the heart of service design - creating councils that are not only more responsive, but also more resilient and financially sustainable in the long term.

Designing Services Around People, Not Structures

This reorganisation is not about centralisation - it is about resetting failing services and reshaping them around the realities of people's lives in Gloucestershire. Families need earlier support, young people with SEND need inclusion and older residents in rural areas need care that prevents isolation. The new councils will be built to meet those needs directly - not to preserve outdated 'at scale' structures.

This means:

- **Lifelong support designed as one system** - aligning children's and adults' services across life stages so that young people in care, SEND, or transition to adulthood do not fall through gaps

- **Clearer access to help** – providing a single front door for access, reducing duplication at key contact points, so residents know who to turn to and get faster support; enabling SEND, education and social care to work effectively together, leading to quicker and fairer outcomes for those most in need

- **Prevention in practice** - linking housing, early help and leisure/physical activity with social care, tackling the drivers of crisis before they escalate; as well as introducing innovative data use, to enable streamlined working, and improved outcomes for the vulnerable.

- **Independent lives for older and disabled people** - enabling housing, planning and adult care to work together on the right homes for everyone, with supported living, particularly important for rural Gloucestershire, where extra care is limited.

- **Healthier, connected communities** - joining up cultural, leisure and public health services to promote wellbeing, reduce loneliness and strengthen Gloucester's identity as a proud, diverse city.

- **Safer local environments** - coordinating public protection (Trading Standards, Licensing, Environmental Health) and other regulatory services to tackle issues such as unsafe housing conditions that disproportionately affect vulnerable communities.

- **Leadership rooted in place** - ensuring decision-making is close to communities, empowering parish and town councils, VCSE groups and neighbourhood partnerships to shape local delivery.

Children's Services & Education

Children's services have made much needed progress on their improvement journey, with a welcome recent "Good" Ofsted judgement following many years of the service requiring improvement. However, SEND services are still in need of focus and improvement and the county-wide model struggles to respond to the very different needs of Gloucester and the wider county as well as a more bespoke structure would.

In Children's Social Care

- High and complex demand: 63% rise in children in care since 2015, with roughly 8,000 referrals annually and sharp rise in Child Protection Plans, particularly in Gloucester and the Forest of Dean.
- Placement capacity constraints: 69% of children are placed in-house, with the remainder dependent on high-cost external fostering and residential provision.
- Workforce fragility: Staffing stabilised since the 2017 inadequate rating, but Ofsted (2025) warns progress remains fragile, particularly in rural and complex case areas.

In Education Services

- Ofsted's 2023 SEND Area Inspection judged provision as "Requires improvement"
- SEND pressures: Over 350 new EHCP requests monthly, a 140% increase since 2015, with long waiting times for assessment and support
- Increasing Demand: growing need for Alternative Provision (AP) and increasing complexity of needs (autism, ADHD, trauma, mental health)
- Funding and infrastructure strain: A high needs budget deficit of £78m, compounded by workforce shortages (educational psychologists, specialist teachers) and schools constrained by physical capacity in growth areas.
- National policy shifts: Expanded early years entitlements, the forthcoming Schools and Wellbeing Bill and SEND reform create both new statutory duties and resourcing challenges.

This context highlights a system under intense strain, with significant geographic inequality (Gloucester carries a disproportionate share of safeguarding and education pressures) and persistent financial risk.

Progress has been made, with Family Hubs, a Social Work Academy, specialist school places, and a SEND Improvement Plan garnering national recognition. Yet these gains remain fragile because they are delivered through a county-wide model that cannot respond to the very different pressures in Gloucester and the wider county.

With a more localised structure, prevention and resource will be embedded where it is most needed.

Opportunity for Children's Services

Local Government Reorganisation is the opportunity to reset the system so that progress takes root, spreads consistently and delivers sustainable, evidence-led improvement. Partnership working will be key in all areas, and co-production of services will be a central principle of forming the new models.

- In Greater Gloucester: there will be local accountability where demand is greatest
    - GG will focus relentlessly on safeguarding, SEND, youth services and Alternative Provision. Family Hubs will be fully embedded as community gateways to prevention and support. Local leadership will ensure the voice of children and families directly shapes services
- In Gloucestershire Unitary Council: there will be stability and scale across the county
    - GU will sustain statutory education and children's services across rural areas, focusing on sufficiency: new school places, fostering and adoption capacity and SEND provision. County-wide workforce planning will provide resilience and specialist expertise

This means:

- Outcomes will improve: children will be safer, families better supported and young people given a fair chance to succeed

- Costs will be contained: fewer out-of-area placements, more early intervention and sustainable SEND provision
- Accountability will be clearer: leadership rooted in place, aligned to local priorities
- Transformation will be unlocked: prevention-first, workforce resilience, education inclusion and stronger multi-agency collaboration

Together, this resets services around real need, improves outcomes, contains costs, and embeds prevention.

Adult Services

The same approach applies in Adult Social Care, where fragile improvement cannot meet rising demand. Services are under intense strain, with rising demand, fragile improvement and persistent financial risk. At present, the county risks being locked into a cycle of reactive, high-cost provision that fails to deliver independence, dignity, or value for money.

Current Pressures:

- Rising and imbalanced demand: Over 6,400 adults are supported, with demand patterns sharply imbalanced, due to the demographic differences between city and rural areas
- Demographic pressures: The number of people aged 85+ is projected to rise by 84% by 2043 - placing unsustainable pressure on services
- Service fragility: In January 2025, CQC rated Gloucestershire's ASC service as *Requires Improvement* with a baseline score of 50/100, the lowest in England under the new regime.
- Financial challenge: A £13.9m savings programme is underway, focusing on shifting provision from residential care towards Extra Care and reablement, but current structures limit pace and sustainability
- Workforce fragility: Ongoing shortages across social work, mental health and occupational therapy constrain resilience
- Fragmented commissioning: Delegation of functions to NHS partners weakened strategic oversight. Although these functions are now being reclaimed, the system remains unstable

There are some signs of improvement, but services are still struggling to meet localised need. A £57m capital programme has expanded extra care housing, prevention pilots are underway and the workforce is stabilising after years of churn. However progress is insufficient, as the low CQC rating demonstrates. Adult Social Care will not be sustainable without a structure that supports prevention and resilience at scale.

Opportunity for Adults Services

The creation of Greater Gloucester (GG) and Gloucestershire Unitary (GU) provides the platform to deliver a system designed around people, communities and place, rather than structures.

- In GG: local accountability where demand is greatest
    - Focus on complex supported living, residential care, safeguarding and prevention.
    - Local leadership accountable to communities facing the highest demand and most complex needs.

- In GU: stability and scale across the county
    - Sustaining statutory responsibilities across the rural areas
    - Expanding Extra Care capacity, strengthening domiciliary provision and investing in prevention to reduce long-term demand

This means:

- Outcomes will improve: more prevention, better safeguarding and support closer to home
- Costs will be contained: fewer high-cost placements, more community-based solutions, sustainable provision
- Accountability will be clearer: leadership rooted in place, aligned to local priorities.
- Transformation will be unlocked: prevention-first, workforce resilience, stronger commissioning and collaboration with NHS partners

Without reform, the pressures in Adults' Services will continue to drive unsustainable costs. A more localised model, driven by strategic and prevention orientated decisions, is the only option. Better care cannot come at ever-higher cost - reform must deliver both.

This is our opportunity to ensure that every adult in Gloucestershire - whether living with complex needs, older age, or long-term conditions - can live safely, independently and with dignity.

By embedding prevention locally, GG and GU can protect lives and protect budgets.

Partnership Working and Integration

These reforms will only succeed with stronger partnerships and inclusive delivery. We will build on existing collaboration and invest in deep, meaningful partnerships. Partnerships are critical; statutory and non-statutory partnerships will be streamlined and strengthened, including, for each new unitary authority:

- New Safeguarding Children's Board
- New Safeguarding Adults Board
- Integrated Care Board and Place-based Commissioning Arrangements
- Youth Justice Strategic Partnerships
- Domestic Abuse Partnership
- SEND Strategy Partnership
- Community Safety Partnership
- Health & Wellbeing Board
- Schools Forum Board

These partnerships will form the fabric of a joined-up system of care and support that spans health, education, justice and community services - and ensure no one falls through the gaps.

Workforce, Safeguarding and Governance

The future of services depends on investing in our people. We will:

- Retain and grow a permanent, skilled workforce, reducing reliance on agency staff
- Recruit high-quality leaders for the new directorates for Adults and Children's Services
- Establish the statutory Director roles for each council, including:
    - Director of Children's Services (DCS)
    - Director of Adult Social Services (DASS)
    - Principal Social Worker - Children's Services
    - Principal Social Worker - Adults' Services
- Appoint Independent Scrutineers for each Safeguarding Partnership
- Establish Safeguarding Adults Boards and Safeguarding Children Partnerships for both councils
- Develop a workforce strategy focused on recruitment, retention, wellbeing and continuous professional development
- Embed robust governance through local scrutiny and strengthened member roles

These appointments will ensure that services are safe, resilient and built to last - with professional leadership at the heart of every new system.

A Broader View of Health and Wellbeing

The case for reform is not only about formal health and care provision, but also about tackling the wider determinants of health and enabling people to thrive in their communities.

In Gloucestershire:

- Physical inactivity is around 22%, slightly better than the England average
- Access to sports, green spaces and active travel options varies significantly between communities, contributing to long-term inequality
- Bringing housing, planning and care together will help us create more supported housing options that allow people to live independently for longer
- Integrated leisure, culture and public health strategies will enable more people to live active, connected lives - reducing loneliness and improving physical and mental wellbeing
- Community safety will be strengthened by aligning teams and partnerships, tackling shared priorities like domestic abuse, child exploitation and anti-social behaviour
- There is a disconnect between health, housing, leisure and planning - leaving untapped potential to design healthier places and systems

The new councils will be well-positioned to embed public health in everything they do - aligning planning, transport, housing, leisure and social care into a cohesive approach to wellbeing.

Managing Risk, Realising Benefits

Disaggregating existing services will be complex, but it is manageable. Lessons from other areas, such as Cumbria, show it is possible to deliver the change safely, protecting services, while building for a stronger future.

We are committed to managing this process transparently and responsibly, with a focus on:

- Transitioning safely with minimal disruption to service users
- Protecting frontline delivery throughout the change process
- Realising financial efficiencies through leadership consolidation and service redesign
- Engaging our workforce and service users throughout the change
- Building a new vision collaboratively with staff, partners and communities

Our Commitment to Children, Families and Adults

We're not simply carrying over what already exists. This is our opportunity to build something better - designed from the ground up to work for every resident, every community and every part of Gloucestershire.

We are committed to:

- Protecting and improving essential services - keeping children, families and adults supported, safe and well during and beyond transition
- Listening to local voices - involving communities, service users and frontline staff in shaping the future of care and support
- Looking after our people - investing in the workforce who care for our residents every day and ensuring their skills and wellbeing are valued
- Providing better access for all - making it simpler to get the help you need, with clear contact points, joined-up teams and support closer to home
- Using public money wisely - ensuring every pound makes a difference, with savings reinvested into the services that matter most
- Putting children and families at the heart - improving opportunities, inclusion and support for every child, whatever their starting point
- Delivering in partnership - working side-by-side with health, education, police, voluntary groups and others to create joined-up solutions that work
- Keeping decisions local - ensuring services reflect the needs of each place, with accountability rooted in our communities

This is more than just structural reform. It's a commitment to fairness, quality and care - and to ensuring that no matter where you live, you can expect the same high standards of support and opportunity.

Every resident, in every part of Gloucestershire, deserves services they can trust - and a council that puts people first.

g. Councils that Work for All

The current two-tier system is complex and confusing. With seven different councils, responsibilities are split, decisions are duplicated and accountability is blurred. Residents often do not know who to contact and too many decisions feel remote from the communities they affect.

This model makes local government simpler, clearer and closer to the people it serves. With only two councils, every resident will know who is responsible and how to hold them to account. Services will be designed around lived reality, not historic, complex or multi-layered boundaries.

Closer to Communities

Both councils will embed a locality-based model that brings decision-making and services closer to neighbourhoods, families and places The proposal will build on the existing strong relationship between the District Councils and Parish and Town Councils in rural areas and use them for effective engagement, supported by partnerships with voluntary and community groups and new neighbourhood forums. This will ensure local voices drive local priorities and services can be tailored to the distinct needs of urban and rural communities.

Accessible and Inclusive

Services will be designed around residents, using customer insight and evidence to improve outcomes. Modern digital access will sit alongside local hubs and face-to-face support, ensuring that nobody is excluded. The focus will be on simplicity and inclusion - making it easier for everyone to get help when they need it. There will be a single phone number for all council services in each unitary, and a single website for each enabling people to access services without complication.

Empowering Residents

The new councils will actively encourage co-design with communities, building trust and participation. Neighbourhood empowerment will give residents a stronger voice in shaping the services that matter to them. This will strengthen democratic engagement, accountability and transparency.

It is anticipated that in Greater Gloucester, relationships with parish Councils will be strengthened by establishing a formal committee of Parish Council Chairs. This innovative community engagement model will ensure that those residents who live in the wider urban area surrounding the city have, for the first time in decades, democratic representation and influence and a second voice, alongside their unitary Councillors, to ensure that their particular voices and needs are heard.

Simple, Clear, Accountable

With two councils, local government in Gloucestershire will be easier to understand, simpler to navigate and stronger in its representation. This simplicity will cut bureaucracy, save money and deliver councils that genuinely work for all: accessible, responsive and accountable to every resident and business.

5. Future Devolution

Local Government Reorganisation presents a pivotal moment to unlock Gloucestershire's full potential, both within its borders and in respect of its offer to the wider United Kingdom. As Government implements England-wide Strategic Authority coverage, Gloucestershire offers a significant contribution to a regional 'at scale' economy, whether it joins an existing Strategic Authority or forms a new one.

Gloucestershire is a rare economy, as it is notably resilient to national and global economic shocks[2]. It has existing significant strengths in Advanced Manufacturing & Engineering and Food Security innovation (a combined 23.7% GVA)[3] and is exceptional in the high-growth sectors with a focus on the securing of emerging technologies[4]. Our sectors of strength almost completely align with the priority sectors of the 2025 Industrial Strategy. Building on a strong industrial heritage particularly in Gloucester, carried through into aerospace and engineering, and an evident culture of innovation catalysed by the presence of GCHQ in Cheltenham, we outperform our neighbours on productivity, business start-ups and entrepreneurship.

Where innovation is so evident in our culture, it follows that it must originate in our people. We host a skilled population, supported by strong universities, colleges and research networks that have proactively reached out into regional networks.

Inherent to Gloucestershire is our natural capital. From the Cotswolds and Forest of Dean to the Severn Vale, Gloucestershire's landscapes give us the space and resources to lead on the challenges of the 21st century. As part of the Severn Estuary corridor, we can offer clean energy, sustainable food, water management and climate adaptation. Few places can match the combination of the industrial heritage of Gloucester, the high tech growth around the urban centres, and the natural assets that define Gloucestershire's offer.

Gloucestershire blends its landscapes, cultures and economy into a unique identity that draws on west country heritage and lifestyle to inform future thinking. From the invention of the jet engine near Gloucester to pioneering hydrogen flights at Cotswold Airport[5]; from the Wheatstone Bridge to the Golden Valley; from being home to the invention of the lawnmower to hosting one of the deepest water research sites in the world in Tidenham[6], Gloucestershire's regional positioning under new devolution offers an at scale future economy that constitutes an offer to the UK, and indeed the wider world.

Devolution is key to realising this potential. With greater funding flexibility, joined up services and empowered local decision-making, Gloucestershire can play its full role as a regional engine of growth at the crossroads of the south-west, midlands, south-east and Wales.

Gloucestershire is actively exploring strategic partnership to the north, south and east. It should be emphasised that these three options are not an exhaustive list, rather three were selected according to the shared length of boundary with Gloucestershire and consideration of whether agreements had been made for bordering counties to join alternative partners. Of these three, we found each offer unique opportunities to accelerate growth and influence:

- West of England Combined Authority (WECA) – Offers alignment with high growth sectors like cyber,

[2] Economic Strategy Evidence Base.
[3] Regional gross value added (balanced) by industry, ONS
[4] Gloucestershire's Economic Strategy 2024–2034 Summary
[5] ZeroAvia completes initial Dornier 228 flight test campaign - Pilot
[6] DEEP - Engineering Wonder

green tech and advanced manufacturing. Existing formal and informal regional partnerships suggest high ease of implementation. Strongest alignment against 'areas of competence' outlined in the Devolution & Community Empowerment Bill.

- Herefordshire & Worcestershire – Shares cultural and rural economic strengths with potential for innovation and scale up, also a strong cultural connection in respect of heritage.
- Swindon & Oxford – Opens doors to long term collaboration in R&D, clean tech and AI.

Gloucestershire is at an important juncture. By pursuing reform and deeper devolution, the county can strengthen its contribution to regional prosperity and national growth, while remaining grounded in the communities and landscapes that define its character.

Options Considered

Based on the above, Gloucestershire is able to offer significant capacity for growth in a regional economy. This is underpinned by its economic strengths, strategic location and alignment with Government/public sector reform. A range of metrics were therefore assessed against economic, legislative, cultural and implementation criteria to identify which partnership could deliver the greatest impact in line with national devolution goals. The full details of these assessments can be found in the annexed reports to this document. What follows is a summary of those findings. These metrics were assessed against three options:

Option 1 – West of England Combined Authority (WECA)

Geography & Governance:

- Existing combined authority with metro mayor which is fully compliant with the Devolution & Community Empowerment Bill 2025 and December 2024 Devolution White Paper.
- Combined population (Gloucestershire + WECA *with North Somerset* rises above the minimum 1.5 million threshold guidance for Strategic Authority formation).

Strategic Authority Alignment:

- Highest degree of alignment across the Bill's seven statutory areas of competence – particularly health & care integration, transport and infrastructure, economic development, environment and public safety.
- Pre-existing governance, transport corridors, NHS integration, and multi-agency delivery capacity provide a rapid implementation route.

Economic Geography Alignment:

- Strong alignment in advanced manufacturing, digital/cyber, green technologies and creative industries. Strong worker migration pattern across the borders.
- Potential to position Gloucestershire as an agri-tech leader within a wider innovation economy, offsetting WECA's urban focus.
- Gloucestershire however may become a junior partner in the highest growth R&D sectors without a clearly defined role in bringing forward its strengths (e.g. agri-tech)

In essence, WECA holds the path to the most immediately deliverable option with high policy readiness, strong sectoral synergy and cultural compatibility. WECA offers the broadest alignment with national reform priorities and fastest route to full Strategic Authority status.

Option 2 – Swindon & Oxfordshire

Geography & Governance

- No current Combined Authority membership so would require Local Government Reorganisation

and Mayoral Combined authority formation.

- Joint population threshold met with 1.6 million combined.

Strategic Authority Alignment:

- High capability in economic development, skills and net zero, but weaker in health, care and integrated public service reform.
- Existing regional partnerships are largely informal or nascent.

Economic Alignment:

- Significant longer-term potential in R&D partnerships (AI, life sciences, clean tech).
- Synergy in advanced manufacturing and cyber, but less alignment with agri-tech and rural economy. Greater focus on life sciences than securing emerging technologies in the innovation sectors.
- Lower short-term economic integration due to weaker commuting links and business interdependencies.

Swindon and Oxford offers a strong innovation and research collaboration potential for the long term, but slower to establish full statutory competencies with less immediate integration in health (WECA) and rural (Herefordshire & Worcestershire) sectors.

Option 3 – Herefordshire & Worcestershire

Geography & Governance:

- No current combined authority and therefore would require Local Government Reorganisation and Mayoral Combined Authority formation.
- Population slightly below the threshold so may require additional partners or special consideration.

Strategic & Policy Alignment:

- Medium alignment across statutory competencies with strengths in environment, rural transport and agri-tech but limited in digital innovation and large-scale economic growth.
- Less alignment with national reform agendas' focus on integrated care and high-growth sectors.

Economic Alignment:

- Closest match in current rural economic strengths and historical cultural context.
- Gloucestershire would likely lead on scale and innovation, but partners offer limited capacity in high-growth digital and tech sectors.

Summary

1. West of England Combined Authority (WECA)

- Why: Existing governance, metro mayor, statutory compliance, strong sectoral fit (advanced manufacturing, cyber, green tech) and clear commuting/economic flows. Existing regional partnerships across arts, culture, health and the broadest range of services of all options. A key similarity is shared in urban/rural splits, reflecting shared challenges along housing and transport planning.
- Risk: Gloucestershire risks becoming a junior partner unless it defines a distinctive role (e.g. agri-tech leader completing a 'whole of tech' future economy).
- WECA provides the high-growth innovation engine, Gloucestershire complements and then completes the ecosystem with agri-tech and natural capital.

2. Herefordshire & Worcestershire

- Why: Close match in rural economy, heritage, and agri-tech. Natural cultural legacy fit and scope for Gloucestershire to play a leading role in innovation and scaling up. Slightly under population threshold, but culturally congruent and offers Gloucestershire leadership space.
- Risk: Limited digital/tech capacity in partners and weaker alignment with national reform priorities.
- Rooted in shared rural economy and heritage, with Gloucestershire as a natural partner to inject innovation and scale.

3. Swindon & Oxfordshire

- Why: Strong in R&D, life sciences, AI, clean tech. Good synergies in advanced manufacturing and cyber, but requires completely new governance, has weaker cultural alignment and less short-term integration with Gloucestershire's rural and health economies.
- Risk: Longer time horizon to deliver; innovation is research-led and urban, less aligned with Gloucestershire's wider economic identity and very few established regional partnerships.
- Offers long-term potential in global-facing R&D and science but less immediate and less place-congruent.

Gloucestershire has the assets and ambition to contribute strongly within any of the potential partnerships. However, the assessment indicates that **the West of England Combined Authority provides the most immediately deliverable and policy-aligned option**, while Herefordshire & Worcestershire offers a culturally and economically resonant alternative in which Gloucestershire could play a leading role. Swindon & Oxfordshire remains a credible longer-term prospect, particularly for research-led collaboration, but is less immediately aligned to Gloucestershire's wider economic and governance priorities.

Gloucestershire's aims for devolution

Through Local Government Reorganisation and further devolution, Gloucestershire can unlock the tools to drive a high growth, resilience-focused economy and smarter services for residents.

Devolution would allow Gloucestershire to:

- **Power growth through innovation.** Using devolved economic powers to create the Severn Resilience Corridor, bringing together cyber, advanced manufacturing, agri-tech and clean energy. This will attract major private investment, generate high-value jobs, and cement Gloucestershire's role as a national growth engine.
- **Strengthen resilience for the 21st century**. With greater control over housing, health, skills and transport, Gloucestershire can deliver joined-up solutions for climate resilience, energy security and sustainable food systems. Tackling the challenges of the future head on.
- **Put data to work for residents**. A county-wide Data Trust, anchored in Golden Valley's cyber infrastructure would integrate transport, housing, health and utilities in real time. This will reduce duplication, cut costs and provide residents with more personalised, responsive services from flood alerts to smart mobility and integrated healthcare.

Gloucestershire's full vision and ambition sets out a comprehensive programme for inclusive, innovation led growth, drawing on the county's industrial heritage, highly skilled population and rich natural capital. With the right devolved powers and resources, Gloucestershire is well positioned to act as a national testbed for high-growth sectors, resilient communities and data driven public services. Delivering benefits

not only for local residents, but for the wider UK economy.

Conclusion

Gloucestershire is well placed to play its full part in the next phase of English devolution. Our strengths in advanced manufacturing, securing emerging technologies, agri-tech and clean energy, combined with our strategic location and cultural identity, position us as a valuable partner in building a balanced and high-growth regional economy. To achieve this, we seek objective input and active cooperation from Government that both align with the interests of our residents and ensure that the region's innovation potential is fully realised. In partnership, we can demonstrate how devolution unlocks local potential for the benefit of communities here and for the United Kingdom as a whole.

6. Options Appraisal

Summary of Options Considered

A full appraisal of options was carried out to determine the best model for Gloucestershire. Each was tested not only against Government criteria, but also against what matters most to our people: clear, local accountability, value for money and councils that reflect local identity and needs.

The GG/GU model scores strongly on service improvement, identity and devolution potential. While a single county model scores higher on size/efficiency, evidence from Cumbria and Dorset shows multi-unitary models can deliver better outcomes in high-cost services.

The Options Appraisal is undertaken by assessing each of the following options against the Government criteria:

- Single County Unitary (Single Unitary)
- East/West Split (East/West)
- Greater Gloucester and Gloucestershire Unitary Councils (GG& GU)

The scoring on each sub criteria is as follows:

Score	Definition
3	Fully Meets Government Criteria
2	Largely Meets Government Criteria (or strong rationale as to why not)
1	Partially Meets Government Criteria
0	Does Not Meet Government Criteria

The scores are then totalled up for each sub-criteria and a theme score is calculated (which forms part of the final options table). The overall scores are an accumulation of all theme scores.

Options Appraisal against Published Criteria

Criteria 1

1. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.

a) Proposals should be for sensible economic areas, with an appropriate tax base
b) Proposals should be for a sensible geography which will help to increase housing supply
c) Proposals should be supported by robust evidence
d) Proposals should describe clearly the single tier local government structures it is putting forward for the whole of the area

Options Appraisal - Criteria 1

	Single Unitary	East/ West	GG + GU	Commentary and rationale for scoring
Council Tax Base	3	3	2	• The Council Tax base in both the Single Unitary and East and West option are balanced and robust • The Greater Gloucester proposal has greater disparity in Council Tax base • All proposals provide an ability to improve planning criteria, support regeneration and deliver the Governments housing growth objectives • The Greater Gloucester proposal involves amending existing District boundaries, but this is underpinned by strong evidence to enable the City to drive growth in the region.
Sensible boundaries supporting housing supply	3	3	3	
Robust evidence base	3	3	3	
Clearly describe the proposal for the whole area	3	3	3	
TOTAL	**12**	**12**	**11**	

Criteria 2

Unitary Local Government must be of the right size to achieve efficiencies

a. Population of around 500,000 or above
b. Strong rationale as to why 500,000 is not appropriate if it does not make sense for an area
c. Focus on understanding how the new model will drive efficiencies
d. The proposal will manage transition costs

Options Appraisal - Criteria 2

	Single Unitary	East/ West	GG + GU	Commentary and rationale for scoring
500k or more population	3	2	1	• The single unitary is the only option to meet 500,000 or greater population • There is a strong rationale for both the East/West and Greater Gloucester proposals and how the geography will support the local area • Financial modelling demonstrates the greatest level of
Clear rationale if not	3	3	3	
Drive efficiencies	3	2	2	
Managed transition costs	3	2	2	
TOTAL	**12**	**9**	**8**	

				savings are available through the single unitary model, with transition costs of £20.8m, ongoing savings of £20.7m by yr3 and a payback period of 3 years • The East/West model has transition costs of £26.9m, ongoing savings of £11.2m by yr3 and a payback period of 4 years. • The Greater Gloucester model involves greater transition costs of £26.9m, will deliver annual savings of £10.8m by yr3 and demonstrates a payback period of 4 years

Criteria 3

Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.

a. Proposals should show how new structures will improve local government and service delivery and should avoid unnecessary fragmentation of services.

b. Opportunities to deliver public service reform should be identified, including where they will lead to better value for money.

c. Consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness and for wider public services including for public safety.

Options Appraisal - Criteria 3

	Single Unitary	East/ West	GG + GU	Commentary and rationale for scoring
Improve Service Delivery	3	3	3	• The context in Gloucestershire is that crucial social care services have historically been rated requires improvement or inadequate • The recent (June 2025) Ofsted inspection rating Children's Services as "good" demonstrates welcomed improvements in the trajectory of social care services • However other crucial services are still not at the required level, with the most recent inspections of Adults Services by the CQC (July 2024) rating as inadequate and OFSTED SEND inspection demonstrating "inconsistent experiences" • It is noted that there is a cost and risk in breaking up Social Care services, but there is demonstrable evidence of focused, place-based models enabling authorities to deliver
Public Service Reform	3	3	3	
Crucial Services	2	3	3	
TOTAL	**8**	**9**	**9**	

				improvement to crucial services e. g. in areas such as the former Cheshire, Cumbria, Dorset and Northamptonshire. Given the disparity of need across Gloucestershire there is a particular opportunity to improve outcomes through more localised working • There are significant opportunities across all models to align the existing two-tiered services and secure ongoing service improvements

Criteria 4

Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.

a. It is for councils to decide how best to engage locally in a meaningful and constructive way and this engagement activity should be evidenced in your proposal.
b. Proposals should consider issues of local identity and cultural and historic importance.
c. Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.

Options Appraisal - Criteria 4

	Single Unitary	East/ West	GG + GU	Commentary and rationale for scoring
Meaningful engagement	3	3	3	• The Greater Gloucester proposal is the only proposal that fully embraces the heritage and culture of both Gloucester and Gloucestershire • The GG unitary authority embraces the heritage of the City and will provide it with the tools to build on that heritage to secure ongoing growth • All proposals have utilised engagement with residents, partners and other stakeholders and that engagement has helped shape their proposals
Heritage and culture	2	2	3	
Address concerns from engagement	3	3	3	
TOTAL	**8**	**8**	**9**	

Criteria 5

New unitary structures must support devolution arrangements.

a. Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established or a decision has been taken by Government to work with the area to establish one, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where

applicable) whether this proposal is supported by the CA/CCA / Mayor. Proposals should consider issues of local identity and cultural and historic importance.
b. Where no CA or CCA is already established or agreed then the proposal should set out how it will help unlock devolution.
c. Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.

Options Appraisal - Criteria 5

	Single Unitary	East/ West	GG + GU	Commentary and rationale for scoring
Combined Authority Governance	2	3	3	• All proposals offer the opportunity to unlock devolution, with the current favoured model joining the West of England Combined Authority (WECA) • Should WECA be the preferred model then there are a number of issues of democratic balance to consider in the different options • The single unitary would create the largest imbalance in if the county were to join WECA as the population is nearly 200,000 more than the next largest authority and a multiple of 3.5 of the smallest. This disparity could lead to issues of governance in the Combined Authority • The East/West model is in the middle of the range for population sizes within the existing WECA model and would support the easiest and most balanced governance position • The Greater Gloucester model is within the range of the population sizes within the authority but does create one authority at the top end of population and the other would be the smallest
Unlocking devolution	3	3	3	
Population sizes	1	3	2	
TOTAL	**6**	**9**	**7**	

Criteria 6

New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.

a. Proposals will need to explain plans to make sure that communities are engaged
b. Where there are already arrangements in place it should be explained how these will enable strong community engagement.

Options Appraisal - Criteria 6

	Single Unitary	East/ West	GG + GU	Commentary and rationale for scoring
Explain how communities are engaged	2	2	3	• A multi unitary model for Gloucestershire will enable greater levels of democratic

Explain any existing arrangements	3	3	3	accountability and support communities in being engaged with decision making • The development of Neighbourhood Area Committees will mitigate the loss of a number of local Councillors in all options and provide a forum for communities to engage in democratic process • The Greater Gloucester model will provide the optimal opportunity to engage communities, with elected Members in the City focused on the local area, and opportunities for engagement via forums such as the Committee of Parishes
TOTAL	**5**	**5**	**6**	

Options Appraisal - ALL SCORES

	Single Unitary	East/ West	GG + GU
Theme 1	12	12	11
Theme 2	12	9	8
Theme 3	8	9	9
Theme 4	8	8	9
Theme 5	6	9	7
Theme 6	5	5	6
TOTAL	**51**	**52**	**51**

The options appraisal demonstrates that there is not one clear option that meets the published government criteria, but that all three options are viable choices for a strong future for local government in Gloucestershire.

Single Unitary - Assessment
The single unitary authority for Gloucestershire demonstrates the lowest cost and shortest pay-back period. However, this option is the most challenging to unlock Government's crucial priority of devolution for every area of England and risks resulting in an imbalanced combined authority.
The options appraisal notes the welcomed improvement in Children's Services, but there remains a strong rationale for a more place based, focused approach to the delivery of other crucial services such as Adult's social care and SEND.

East/West Alignment - Assessment
The East/West split scores marginally the highest across the options appraisal and presents the lowest risk path to devolution - particularly if WECA is the preferred combined authority. However devolution is the only theme where the East/West alignment scores the highest outright, reflecting its position as it scores in second place across many of the themes. This model is the hardest to justify in terms of heritage and identity, as Gloucester and Stroud do not even share a land border with the Forest of Dean, and their identities as places are all quite different.

The Greater Gloucester model - Assessment

The Greater Gloucester model is supported by evidence sources of cities as the driver for economic growth, meaning that while it does not align with Government criteria around population size and does create a population imbalance within the County, it is the only option that puts the historic City of Gloucester at the heart of the region's growth plans. The options appraisal demonstrates that this option scores highest against the heritage and local place and community engagement criteria, reflecting the place-based focus of this proposal.

7. The New Councils

a. Future Operating Model

Creating Strong Councils that Deliver

Creating two new councils is a once-in-a-generation opportunity to design modern, effective organisations - built around local needs, guided by best practice and powered by insight and collaboration.

Each council will operate at scale, but with place-based teams embedded in the communities they serve. Their purpose will be to deliver excellent, responsive services and work with partners to improve outcomes across health, housing, skills, care and more.

To support decisions made by the new councils we have designed a Target Operating Model (TOM) for the two councils. The TOM will:

1. Enable us to deliver on our vision for Gloucestershire
2. Define how the organisations support the place as well as the resident experience
3. Make it real for residents, by getting the supporting structures right

We are proposing a clear set of operating model principles.

Operating Model Design Principles

- These design principles are **grounded in best practice** - both within Gloucestershire and across other previously successful LGR areas - and reflect our shared ambition for high-quality, sustainable services across the county.
- **Focus on outcomes** - Services will be designed around the outcomes that matter for individuals, families and communities, measured through evidence-based, family and community-level impact.
- **Shift to prevention** - We will act earlier to prevent issues, improve lives and reduce long-term pressures on public services.
- **Balance scale with local responsiveness** - Services will be consistent and efficient across the county, while engaging closely with local needs and priorities.
- **Join up experiences** - By connecting access points and data, we'll design services around people, not bureaucratic boundaries. Services will be easier to use, quicker to respond and better at supporting whole-person needs.
- **Grow stronger partnerships** - Councils will work closely with the Mayoral Strategic Authority, NHS, police, voluntary sector and communities - not just delivering services, but coordinating, enabling and

empowering.

- **Embed high performance cultures** - The councils will support a skilled, motivated workforce, focused on collaboration, values-based practice and career progression.

- **Strengthen commissioning** - Strategic, insight-driven commissioning will ensure services are efficient, co-designed and tailored to local realities.

- **Leverage data and digital** - Digital technology will be used to enhance services, improve efficiency and support inclusive engagement.

- **Optimise land and assets** - A smarter approach to public estate will support access, sustainability and regeneration.

- **Ensure financial sustainability** - Robust governance and sound financial management will underpin every decision and every service.

Although the operating models will be a decision to be made by the new shadow authorities, appendix F sets out the assumed service delivery model for each key service area, where these will be aggregated or disaggregated or both.

b. Democratic Arrangements

We're creating two strong, focused councils, each with a clear vision for their area, championing local priorities while working together in Gloucestershire's wider interest.

Local members will be strong representatives and true community leaders, deeply connected to local priorities and aspirations, clearly accountable for services, and powerful convenors who bring people and partners together to deliver real impact.

Merging the county and district councils into two new unitary authorities will simplify local government, making it easier for residents to engage with the council, with local members at the heart of that relationship.

While some services will be shared, members on each council will ensure **services are tailored to local needs** and will hold services to account.

Right now, electoral arrangements across seven councils mean that every year sees a council election in at least one part of the county. **This new model brings coherence, clarity, and a stronger voice for every part of Gloucestershire.**

Council	Number of Councillors	Electoral cycle	Next election
Gloucestershire County Council	55	All out every 4 years	May 2029
Cheltenham Borough	40	Elected in halves every 2 years	May 2026 May 2028

Cotswold District	34	All out every 4 years	May 2027
Forest of Dean District	38	All out every 4 years	May 2027
Gloucester City	39	All out every 4 years	May 2028
Stroud District	51	All out every 4 years	May 2028
Tewkesbury Borough	38	All out every 4 years	May 2027
Total	295		

Current electoral arrangements

Creating two unitary councils will streamline local democracy, reduce councillor numbers, and create a more stable political landscape for Gloucestershire. But this isn't just about efficiency, it's about strengthening local voices.

We're committed to **enhancing democracy**, not diluting it. Both new councils will be built around a culture that empowers local members to lead, listen, and act on what matters most to their communities.

To ensure **representation that reflects our communities** from day one, having determined the areas that identify with an enlarged Gloucester Council, the new councils' wards will be formed using a mixture of existing boundaries.

Recognising that electoral arrangements should reflect local circumstances, rather than striving for a 'one size fits all' approach, council size in each of the two unitary authorities will reflect the balance of need in each area to ensure that democratic representation meets the requirements of its constituents and enables strong and accountable local government.

The result? **A simpler, stronger, and more accountable system, that reflects the makeup and needs of communities across Gloucestershire.**

The Greater Gloucester Council will meet the needs of its residents by looking to existing boundaries at local level to form wards that maintain natural communities, with council and ward sizes that reflect the circumstances and need. Benefiting from the recent boundary review for Gloucestershire County Council, the Gloucestershire Unitary Council will largely make use of existing division boundaries and, in every ward but one, will elect two Councillors.

This approach delivers:

- A **Gloucester council with 52 members** and a **Gloucestershire council with 81** - a total reduction of **162 councillors**.
- Elector ratios of **1:2,478 in Gloucester** and **1:4,489 in Gloucestershire** – reflecting the difference in need across the two council geographies.

Our councillor-to-elector ratio ensures:

- **Capacity to lead through transition** while staying closely connected to communities.

- Both **representation across large, rural divisions** with multiple parishes and **representation for urban settlements** that delivers based on what these diverse communities need.
- **Clear democratic accountability from day one**, with councillors who are visible, accessible, and responsive.

In time, a boundary review could help **streamline representation further**, reducing electoral inequality across the two councils in a manner that truly reflects local circumstances and isn't based solely on numbers.

Council governance will be built on four core principles:

- A clear, unified voice for Gloucestershire
- Seamless collaboration across the public sector
- Strong transparency and accountability
- Community needs at the heart of every decision.

We'll deliver strong, responsive governance through clear leadership, local empowerment, and deep community connection.

We'll deliver this through:

- **Bold, visible leadership** from a Leader and Cabinet in each council - driving collaboration and playing a leading role in the future Combined Authority.
- **Engaged, flexible scrutiny** that brings together all political groups - and where needed, external voices - to shape policy and hold decisions to account. We will use creative, constructive approaches to scrutiny, working at both a strategic and a local level to make sure we're meeting the needs of our communities.
- **Proud civic leadership**, preserving the heritage of Gloucester and Cheltenham while elevating their roles at the heart of each new unitary council. At the countywide level, the Chair of the Gloucestershire Unitary Council will lead the relationship and strong ties with the Lord Lieutenancy to uphold county-wide identity and tradition. For the historic City of Gloucester, maintaining the roles of Mayor and Sheriff that have existed for many centuries, and the relationship with the Cathedral, will be led by the Greater Gloucester Council.
- **Local decision-making power** through area planning committees - handling planning and other place-based matters where local knowledge matters most.
- **Neighbourhood partnerships** that reflect real communities and local priorities - shaping services, guiding funding, and driving community-led development.
- **A stronger role for existing Town and Parish Councils**, backed by a jointly owned charter, new opportunities to take on devolved powers, tailored to each council's appetite and capacity. The Greater Gloucester Council is committed to establishing a committee of Town and Parish Council chairs to engage directly with unitary council decision-makers, but would not seek to parish the rest of the City of Gloucester, making it the only option that does not include a financial risk in relation to the establishment of new precepting authorities, not to mention the additional administration and complications associated with an even higher number of Town and Parish Councils than already exists.
- **A culture of participation**, with co-production and engagement embedded in how we work - reaching every community, including those in non-parished areas.

c. Locality Arrangements

Bringing Power Closer to Home

Gloucestershire is a county defined by its heritage and diversity - thriving market towns, renowned natural beauty, agricultural landscape and rural villages, as well as proud local identities, distinct community priorities and deep civic pride.

The new councils will reflect this reality - building on the strengths of existing relationships and shaping decisions around the places people call home. Local engagement will be central to how services are delivered, decisions are made and public resources are prioritised.

This proposal is not about replicating existing structures - it's about designing a system that works for the future. It takes the best of what already works in Gloucestershire - from parish council leadership to district-level community teams - and gives it a platform to grow.

Since the publication of the English Devolution White Paper, the seven councils in Gloucestershire have worked together with community partners to reimagine how the system can be changed, with our local places at the centre. The result is a proposal to vest much greater power and agency in neighbourhoods, to reset our culture towards co-production with residents, to liberate our strengths in our dynamic community organisations, and to exploit the preventive potential of empowered communities.

The step-change we are seeking resonates across Gloucestershire's public sector and civil society, and amongst Gloucestershire councillors, from all parties and councils. Leaders are united in a view that unitary status offers a significant opportunity to shift the scale and extent of community empowerment in the county. The smaller scale, localised good practices already delivered by our current councils and key partners like Police and Health can now develop into a more systematic focus on place and empowerment, which will be central to 'how we work' as new councils.

Assessing what works

Throughout 2025 to date, the seven Gloucestershire councils have worked intensively, with key local associations and organisations, to understand what works in empowering communities, and the assets inherent in our current system. We have researched and spoken to over 20 unitary councils which have experimented with area-based arrangements. In addition, we have conducted a review of key literature and thinking in the field. Our early conclusion was that an area-based approach would be essential given the size and scope of unitary GG and GU Councils. This conclusion anticipated almost precisely the guidance recently received from MHCLG on the creation of area-based committees. Our research strongly suggests that establishing a structure is no guarantee of delivering the participation outcomes intended, but it provides a framework within which change can be achieved.

Among many learning points, the following have been most prominent:

- **The value of long-term trust and consistency.** Many new unitary councils have found it challenging to deliver the promises as set out in their proposals or business case. The result has sometimes been a loss of trust, particularly with local councils and the Voluntary, Community, Faith and Social Enterprise Sector (VCFSE), and the need to rebuild key relationships with local organisations where priorities have changed and resources diverted elsewhere.
- **The extent to which community empowerment is truly understood, embodied and visibly acted upon by the new council councils**. We have been clear that area-based arrangements are not an

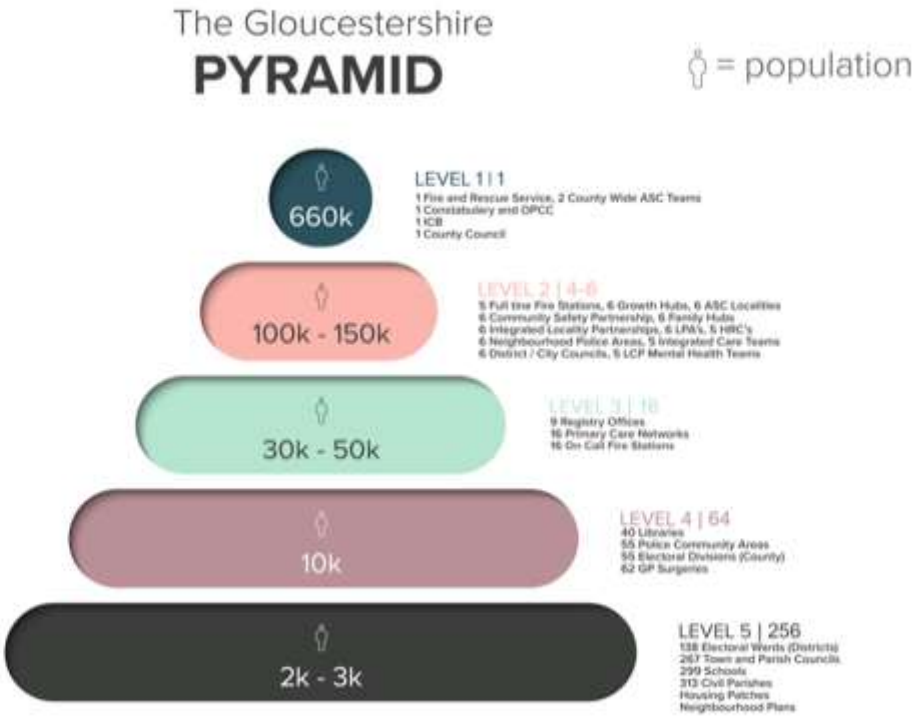
'add-on'. For value in prevention, participation, and cohesion to be delivered, co-production cannot be confined to a neighbourhood model. The way in which the council is councils are organised, lead, and delivers deliver services needs to be based on the same values and approaches. Without this authentic joining-up, trust and credibility will be quickly eroded.

- **Focus on community development.** Our analysis suggests that unitary councils have often used area-based arrangements well in acting on visible economic and environmental issues in localities. A harder challenge in other parts of England has been to tackle health, inequalities, and social factors with communities. We believe strongly that resources and focus applied to community development, working with the VCFSE, is a means of managing this risk. Equally we have seen elsewhere that the crucial relationships between local government and the health system are less developed than needed to deliver on well-being, health, and social outcomes. In our model, the role of Public Health is central; in part to help bridge priorities and capacities of the health and local government systems.
- **An area-based approach can be powerful in strengthening communities.** The evidence is clear that this approach can act to both to represent the council's responsibilities and also to work across sectors and issues. We have seen risks elsewhere of an overly prescribed approach from the centre of the council, with insufficient emphasis on test and learn, and on shaping the agenda for areas based on communities having the agency and resources to develop local solutions to the issues they face. We have also learned that to maximise inclusivity, we need to be careful about use of formal language and structure such as 'committee'. The task of empowering communities requires the council councils to engage in ways that maximise inclusion of all our residents and is not perceived to be miniaturisation of the council councils in a locality.

These learning points have been crucial in shaping our model and associated proposals.

Building on local structures and good practices

Our mapping of neighbourhood approaches has revealed a range of geographic scales where services are provided by councils and partners. It is noticeable that many services already deploy some form of area-based working. As the footprint of current district boundaries disappears for most purposes, the focus of organisation will shift from populations of around 100k to smaller populations of under 50k. This shift offers a new potential for Gloucestershire's ambitions for community empowerment, organised around natural communities, which feel more local to residents



There is significant diversity in approaches to current place-based working across the seven councils and partners. Examples of positive difference include:

- The community hub approach developed in Stroud District during the pandemic which has endured and developed subsequently, working with local voluntary organisations, parishes, and housing providers to address social isolation and health and wellbeing
- The integrated locality partnerships led by the NHS that have brought together health and other partners at a local level, currently based on district footprints
- The wealth of community-centred regeneration and economic initiatives, including the award-winning Gloucester Forum and the Golden Valley development in Cheltenham
- The innovative partnership between the Forest of Dean District Council and the Forest Voluntary Action Forum which has developed a dynamic approach to a range of needs, including youth services.
- The recent successful launch of Gloucestershire's Family Hubs and associated Family Hub Networks. Therse are organised in five locations across the county but with an emphasis on wider outreach. Partners include the Gloucestershire Gateway Trust which has developed a whole neighbourhood and community led approach to supporting children and families in Gloucester and the Forest of Dean.
- The area-based community development approach pioneered in Tewkesbury and closely tied to the rapid housing and business growth in the area
- The active approach taken by Cotswold District Council in its unique geography to supporting its 115 parish and town councils, including the showcase annual 'Cotswold Parish and Town Summit'

Our proposals for neighbourhood working aim to strengthen this diversity where local needs are different, while recognising that much of our good practice has yet to be exploited or scaled beyond current boundaries.

Neighbourhood Area Committees: A new focal point for communities

Another defining feature of this proposal is the creation of Neighbourhood Area Committees (NACs) - partnership-led groups aligned to local geographies and priorities.

The scope of each partnership will be widely framed but allowing sufficient room for our diverse places to set agendas and priorities which are locally meaningful. The five key roles each partnership will perform are set out below:



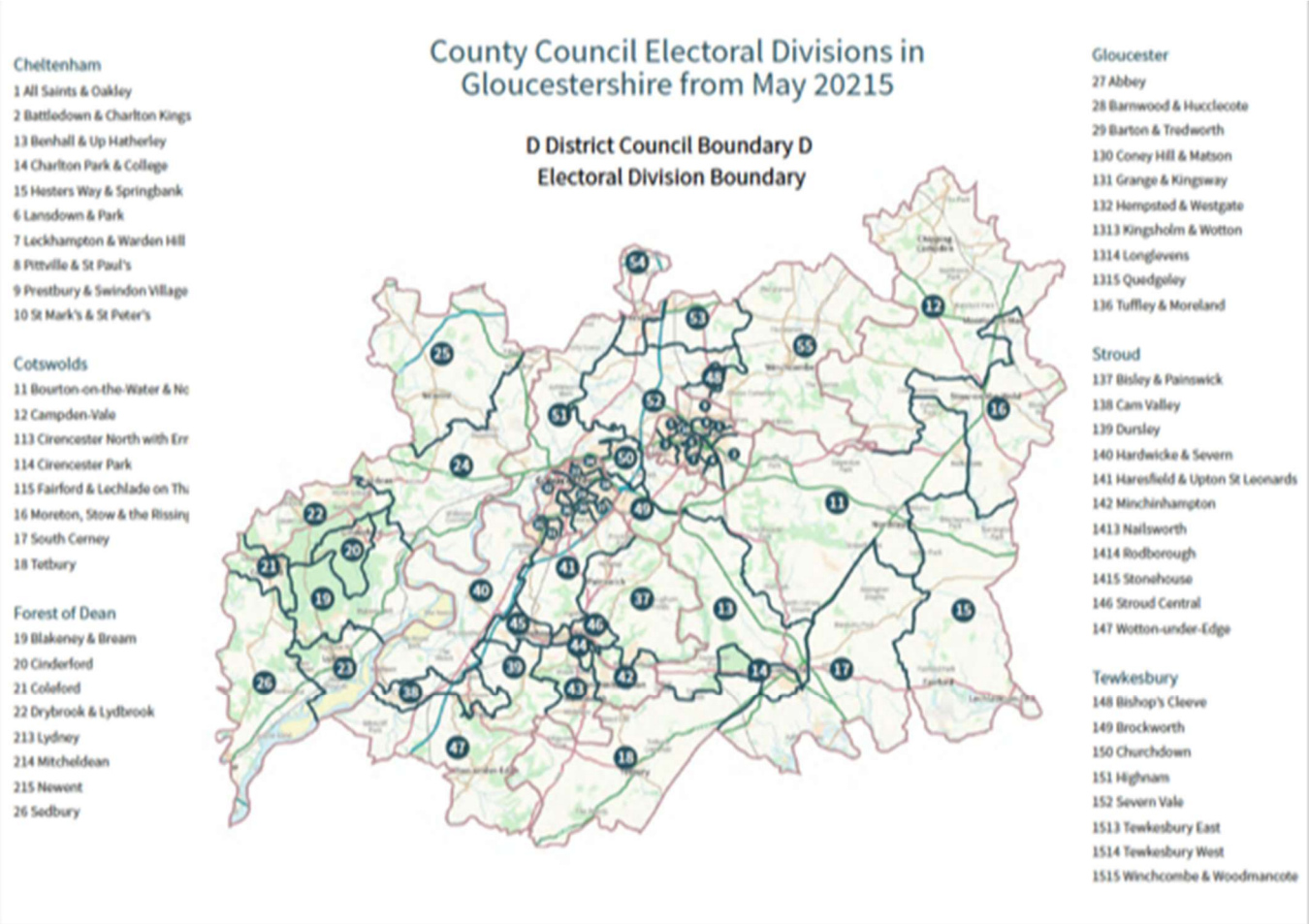
These are not administrative overlays, but locally embedded governance units built on the footprint of Primary Care Networks (PCNs), creating sensible, data-informed boundaries that reflect real communities. Neighbourhood Area Committees will partner with and provide a voice for Gloucestershire's existing strong communities, such as Gloucestershire's 4,000 voluntary and community organisations and the Know Your Patch networks.

Decisions will be shaped by robust local data and customer insight, ensuring NACs focus on real community priorities. Powers and budgets may vary between committees, reflecting local population, deprivation, opportunities and growth - but all will operate within a clear, consistent framework set by the new councils.

This structure recognises that different areas have different needs. The size and boundaries of each neighbourhood will be subject to thorough consultation, but our research suggests populations will need to be big enough to allow the councils and partners to work with and for the neighbourhoods. However the partnerships will also need to be small enough to reflect natural communities, typically comprised of a main town and surrounding villages or a recognisable neighbourhood of a major town. Populations of between 30k and 50k will be guided, and options set out within the consultation process. The result will be between 15-20

Neighbourhood Partnerships for the Gloucestershire Unitary Council

The map below sets out the current county electoral divisions which we propose are the main 'building blocks' of neighbourhoods for the Gloucestershire Unitary Council, although there might be some boundaries where a precise use of these divisions would not fully reflect natural communities. The consultation would therefore be open to adaptation where evidence suggests it is necessary. Based on our governance proposals, each area would comprise a committee of between five and seven unitary councillors, in addition to co-optees.



Neighbourhood Partnerships for the Greater Gloucester Council

As an interconnected urban centre, where the ward geography creates a strong sense of neighbourhood, the role of neighbourhood partnerships is harder to define, and conversations with communities will be needed as part of the transition process to clarify what geographies make sense, and how people would like to see them operating alongside their democratic representatives.

Using other local geographies and representative approaches

Not everything the councils do will fit neatly into our structure of Neighbourhood Partnerships. For example, we would expect the shadow authorities to consider the case for area-based development control committees. The number of proposed Neighbourhood Partnerships, however, would be too many to be practical and democratically accountable for this purpose, and so the new councils will be cognisant of existing Local Plan structures until such time as they are revised.

Working in place is a major part of our plans, but co-production is not confined to geographic affinity. Communities of interest and experience, including vulnerable groups such as care leavers, deserve councils that can enable and support their voices. Working with services which have been recognised for their good practice (such as children's social care) will enable the offer to residents and organisations to be consistently strong, and for the new councils to continue to innovate in shifting the balance of power towards communities of interest, identity and experience. The new councils will take the opportunity to make a step change in the quantity and quality of citizen participation. They will invest in consultation technologies and tools that strengthen citizen engagement both locally and across the authorities' footprints. Policies and strategies will be developed which mandate co-production or other forms of meaningful engagement, and enabling of all voices to be heard.

To further strengthen our 'contract' with residents and the c.4,600 VCFSE organisations in Gloucestershire that work on their behalf, we intend to develop a Civil Society Covenant which will be developed in partnership with the Gloucestershire VCS Alliance. A Covenant, accompanied by an action plan, will set out the way in which local government will work with the VCFSE, and the underpinning principles which will guide action on both sides. The Covenant could continue as a shared project for both new councils, with councillors from both councils represented on a joint governance body with VCFSE partners, to be established over the Shadow Authority period. An alternative option for the two authorities respectively would be to progress separately.

Equipping Neighbourhoods with the capacity and resources to deliver

Expert staff teams will be built around our Neighbourhoods. We anticipate the following roles:

- The Chair of the Neighbourhood Partnership: An elected councillor, nominated by councillors in the Neighbourhood
- Neighbourhood Partnership Manager: Together with the Chair, this role will form a crucial leadership partnership in making the neighbourhood work successfully.
- Council Neighbourhoods Teams: With officers assigned to each neighbourhood, these will be a mix of practically-focused managers, town, and parish liaison officers, and community development specialists
- Departmental council officers: Located in family hubs, housing patches, planning, public health, or social care, these officers will have a strong relationship / dependency with Neighbourhoods
- VCSFE: The VCFSE sector will play a crucial role in the grass roots work for each Neighbourhood, some potentially working with the councils in managing and facilitating a whole neighbourhood, or providing expert community development capability, building on existing VCSFE strengths in Gloucestershire
- Partner organisations: Organisations such as Health, Fire and Rescue, Police, Schools, and Housing Associations will be a vital part of work with Neighbourhoods. Over time we expect to see much stronger alignment of wider public sector boundaries with Neighbourhoods
- New Councils' Performance Teams: Evidence and data are needed to support Neighbourhoods in identifying needs and monitoring effectiveness. Allocated time and services from the new councils' performance teams will be assigned to the overall neighbourhood structure. It is expected that key data from different sources will be brought together to provide clear and actionable insight for each Neighbourhood Partnership.
- Public Health: In their communities role, Public Health will provide an important professional oversight and function in supporting Neighbourhoods to use data, policy, and evidence effectively.
- Director-Level Officer Champion: Each Neighbourhood will be assigned a director-level officer champion to provide problem-solving and opportunity identification support to Chairs and Neighbourhood Partnership Managers.
- External-facing services: To ensure the neighbourhood approach works across all council functions,

all external-facing service areas will be required to develop a neighbourhood offer as part of their service planning.

- Budget: We anticipate providing a budget for each Neighbourhood to fund projects and activities which contribute to the core roles of Neighbourhoods. In addition to this core funding, we envisage that Neighbourhoods will be able to strongly influence other funding, both from council departments such as Highways and Transport, and as part of bids for central government programmes.

The new role for councillors in Neighbourhoods

The shift from two-tier to unitary local government results in a significant reduction in the number of councillors from principal authorities, as our governance proposals set out. Fewer councillors will be covering more service areas, bigger geographies, and more electors.

A more significant role for councillors in Neighbourhoods is one way these challenges can be addressed. Neighbourhoods provide the crucial local member role with much needed structure, capacity, and convening authority. In practical terms, Neighbourhoods can bring partners, including parishes, around the table, helping councillors address issues collectively and with expert support, including for local casework. This joined-up approach will help reduce duplication and allow meaningful two-way engagement between elected members and local residents and organisations.

How we will work with local councils (parishes and towns) - A Stronger Role for Parish Councils

While not the direct subject of changes to the structure of principal councils, Gloucestershire's 267 parish and town councils will be significantly affected by reorganisation. For those unparished areas, notably major parts of Gloucester and Cheltenham, reorganisation raises important questions about their status and governance as the county's major urban settlements. Parish and town councils are an essential, vibrant part of our community fabric, and we see their development individually and as a sector as a vital part of our future civil society. We have seen elsewhere in England that, where trust and respect between principal councils and local councils is damaged, opportunities are missed and the achievement of outcomes is hampered.

We will therefore engage in a charter development process with the Gloucestershire Association of Parish and Town Councils (GAPTC) and the Gloucestershire Society of Local Council Clerks (SLCC), to be made available to the shadow authorities for adoption and implementation. The charter will codify the working relationships expected between principal authorities and local councils, the rights and responsibilities of each, and the governance arrangements that help maximise collaboration and good two-way communications. We expect the charter to frame everything we do in terms of outcomes for people and places, and include best value and equality considerations.

Given the Neighbourhood Partnership model will be a new linchpin for locality working, we also expect to describe how local councils can play a valuable role in these structures. It is anticipated the charter process will be developed for Gloucestershire as a whole, and that the respective GG and GU shadow authorities will decide whether to maintain a joint arrangement, or move forward separately.

Uniquely among the Local Government Reorganisation proposals being worked on for Gloucestershire, this option is the only one which is unlikely to lead to the creation of a new Parish Council for Gloucester city, avoiding the associated precepting costs that this risks creating for residents of the City. Instead, with its much higher Councillor to Elector ratio across the City, democratic engagement and community empowerment in decision making will be driven at a more local level, with the additional input of Local Parish

and Town Councils engagement and involvement in decision-making through a Committee of Parish and Town Council Chairs.

There are many parishes in the county which have an appetite and good rationale to develop their offer. At this stage, and mindful of best value considerations, we propose to work positively with local councils to optimise the value delivered to local people and places. There will be equality of opportunity in terms of the scope of the potential services and assets to be devolved between the larger settlements and any other smaller town or parish.

As Ministers have made clear, we agree and support the differentiation between what towns and parishes can offer and the role of council-led neighbourhood arrangements. In no circumstances would a strong parish arrangement replace the need for a neighbourhood offer by the local authority. We have substantial and valuable local capacity in our towns and parishes, and we will therefore seek to maximise collaboration at the neighbourhood level.

Making it happen

Seven key activities will shape our work over the pre-shadow and shadow authority period:

1. We expect each council to deliver a formal consultation on Neighbourhood Partnerships in the shadow authority period, enabling implementation in Year 1 of the new unitary councils. We also hope to have tested much of our thinking through engagement in the pre-shadow period. Our engagement and consultation will include the following elements:

- The geographies and boundaries for Neighbourhood Partnerships
- The core roles for Neighbourhood Partnerships
- The services, issues, and needs of most importance in different parts of the authority areas
- Work with partner organisations to align approaches and geographies
- How Neighbourhoods may wish to develop their role over time (there is evidence from elsewhere that successful area-based working takes time to evolve and develop)
- How we propose to support, enable, and facilitate Neighbourhoods, including creating the capacity and resources most needed (bearing in mind constraints).

2. We will develop a Civil Society Covenant during the pre-shadow period (with the VCS Alliance and other partners). A draft covenant will be available for the shadow authorities to consider and consult on in readiness for Year 1 of the new councils.

3. A draft Local Councils Charter will be developed with GAPTC and SLCC and be made available to the shadow authorities for consultation. The GG and GU shadow authorities will have the option of progressing the Charter (and associated action plan) with a joint body of councillors and local council representatives, or separately. In addition, the seven principal councils will work together in the pre-shadow period to ensure common communications and policies are in place for working with local councils.

4. We will engage all county and district services in the pre-shadow period to identify options for working with Neighbourhoods. This work will feed into service planning for the new councils and help establish a ‘services and assets offer’ to each area.

6. A range of policy development work will be set in place to ensure:

- Neighbourhood approaches are supported by good evidence

- Frameworks and models are established for different types of activity (for example, community development, project funding, Neighbourhood Action Plans)
- The governance of each Neighbourhood is robustly framed
- Data and data insight tools are developed

7. We will continue to work closely with all our statutory partners to integrate our proposals with their frameworks and priorities. We believe our Neighbourhood structure will provide a powerful channel for partners to engage. For example, we share the excitement and interest in how the NHS 10 Year Plan will translate into action in Gloucestershire, particularly with reference to proposals for a 'Neighbourhood Health Service' and the attendant emphasis on prevention. We will continue to be working in close collaboration with our health partners and other statutory partners to ensure the local geographies and approaches we respectively utilise are as aligned as possible in the best interests of Gloucestershire's residents.

These seven key activities form part of our road map within this proposal.

d. Leadership Structure

The creation of two new councils for Gloucestershire presents a unique opportunity to establish leadership structures that are transparent, resilient and designed to serve residents well from day one.

These new arrangements will be grounded in democratic accountability, clear decision-making and a renewed focus on partnership. While final decisions on political and managerial leadership will be determined by the new authorities, this section sets out an indicative model, drawing on best practice from recent local government reorganisations.

A Model Shaped by Residents and Elected Members

Each council will be led by a democratically elected Leader and Cabinet, reflecting a model familiar to residents and used successfully in existing Gloucestershire authorities. This approach is consistent with recent local government reforms in areas such as North Yorkshire and Westmorland & Furness.

The proposed structure includes:

- A Leader elected by the full council
- A Cabinet of Executive Members appointed by the Leader
- Scrutiny and accountability arrangements through cross-party committees, including within the Greater Gloucester unitary, a Committee of Parish and Town Councils
- A Chief Executive providing overall organisational leadership
- A Corporate Leadership Team comprising statutory officers and directors of key service areas

These leaders will act as convenors across health, schools, police, voluntary and community partners - building the collaborative culture needed to deliver whole-system change. They will ensure the new councils are capable of leading transformational change while remaining closely connected to the needs and ambitions of Gloucestershire's diverse communities. They will also provide strong alignment with the Mayoral Strategic Authority, supporting joined-up leadership across the whole area.

Creating Capacity and Capability

To ensure both councils are well-equipped from day one, each will appoint:

- Statutory officers, including Directors of Children's Services, Adult Social Services and Public Health, along with a Chief Finance Officer and Monitoring Officer
- Senior directors across functions such as housing, regeneration, community services, corporate operations and place-based delivery
- Programme leads responsible for managing the transition, organisational development and service integration

These appointments will provide the professional leadership required to support continuity, drive performance and uphold the highest standards of public service.

Supporting a Smooth and Secure Transition

Consistent with lessons from other areas, transition will be delivered frontline-first, minimising disruption, avoiding excessive consultancy costs and protecting continuity for residents. Leadership structures will be introduced in parallel with robust transitional arrangements, including:

- Shadow leadership roles established early in the implementation phase
- Interim programme and service leads drawn from existing organisations
- A phased and well-managed handover of responsibilities from current authorities to new leadership teams

To ensure service continuity, safety and public confidence, early appointments will be made to key statutory leadership roles - particularly the Directors of Children's Services, Adult Social Services and Public Health. This early recruitment will enable these statutory leads to shape operating models, oversee workforce planning and build strong professional teams to lead transition and delivery.

They will also maintain continuity of critical safeguarding and care responsibilities, with established relationships with regulators, partners and safeguarding boards remaining intact. These officers will work within robust governance frameworks, ensuring risk is effectively managed and services remain safe, stable and compliant throughout the transition period and beyond.

This approach reflects our commitment to deliver change responsibly - with residents' wellbeing, service integrity and public trust at the centre of everything we do.

e. Workforce

The New Councils: Workforce

The workforce approach builds directly on our vision and ambition and operating models (TOMs). The new councils' TOMs provide an opportunity to reimagine what it means to work for our councils and to invest in continuing to develop **diverse, valued and multi-skilled workforces.**

By reshaping how we attract, develop, and empower staff, we unlock **greater mobility, clearer career pathways, and the chance to embed a culture of innovation and continuous improvement** across services.

Gloucestershire's workforce challenges

Our workforce is talented and dedicated, but we're not immune to the pressures facing local government. LGR is our chance to tackle these challenges head-on and build a workforce that's resilient, inclusive, and future-ready.

- **Recruitment and retention**: Stability is impacted by competition for talent, especially in social care, education, and technical roles. To attract and keep the best, we need to offer more than just a job. Flexible working is increasingly expected, and career pathways could better reflect diverse progression routes.
- **Diversity and representation:** There are gaps in workforce diversity, with underrepresentation in some roles and areas. Promoting Gloucestershire's strengths more widely can help attract a broader range of talent.
- **Wellbeing and change fatigue:** Staff are under pressure, particularly in middle management and specialist roles. A stronger focus on wellbeing and open communication can help build a culture that embraces change and supports growth – ready for what comes next.
- **Skills for the future:** Rapid technological change means we must invest in digital and data skills across all roles. Updating job structures and expanding access to learning will help build a confident, adaptable workforce ready to lead transformation.

Unlocking new opportunities for our workforce

LGR creates a unique moment to reshape how councils engage, support, and develop their workforce. By aligning people strategies with the broader transformation agenda, councils can unlock new potential and build future-ready organisations.

Through LGR the councils can:

- **Reset organisational culture** by embedding inclusive values, energising teams, and empowering staff to shape services. This fresh start unites colleagues through adoption of new behaviours, attracts new talent, and creates real ownership and pride - across every corner of Gloucestershire. By putting wellbeing and resilience at the centre, we'll tackle change fatigue and build a workforce that's more connected, motivated, and driven by a shared mission.

- **Strengthen recruitment and retention** by reducing internal competition for talent, enabling more flexible resource sharing, and creating clearer pathways for retraining and upskilling. Structural changes, such as refining spans of control and smarter job design, can improve efficiency and clarity

- especially important in high-demand areas like social care, education, planning, and technical services. LGR allows councils to become more attractive employers, offering rewarding careers and development opportunities.

- **Build skills and capability** by investing in digital literacy, data competence, and shared training – raising standards and opening-up new career routes. We'll close skills gaps in areas like AI, development operations, data analysis, and data engineering – competing with the private sector and positioning the councils as forward-thinking employers, ready to meet future challenges with confidence. And by sharing these skills with wider partners and the community, we'll boost employment prospects and deliver real social value.

- **Support diverse career pathways** by recognising the value of both specialists and generalists and creating structures that reward horizontal and vertical progression equally. Through investing in specialist skills – like commissioning, contract management, market shaping, and quality assurance – we'll help staff feel more valued for their unique strengths and open up fulfilling career journeys within each organisation.

- **Promote workforce diversity and representation** by setting the standard for an inclusive workplace. Addressing persistent gaps in representation and removing cultural and structural barriers in recruitment and progression, we'll build a workforce that better reflects the communities it serves – and where everyone can thrive.

Gloucestershire's workforce priorities

Through collaboration across all seven councils, we've identified opportunities to shape workforces that can deliver on Gloucestershire's bold vision and ambitions in the two new unitary councils:

1. **Create a 'fresh start' for the new organisational cultures: Marks the opportunity to reset organisational identity and behaviours following reform, creating a more inclusive and energising environment.**
LGR offers a valuable opportunity to reset organisational cultures. It's a chance to reaffirm shared values, refresh our identities, and foster more dynamic, inclusive workplaces. By moving beyond legacy behaviours and empowering staff to shape the new culture, we'll boost morale, strengthen engagement, and inspire pride in each council's future.
2. **Accelerate digital confidence and capability: Reflects the commitment to equip staff with the digital skills and tools.**
We're embedding digital, data and technology (DDaT) at the core of the new councils, backed by real investment in upskilling our people so that they have the tools and support they need to thrive. By expanding graduate schemes and digital apprenticeships, we'll build workforces that are digitally confident, ready to innovate, and equipped to deliver modern, responsive public services.
3. **Design inclusive career pathways: Reflects the commitment to support both specialist and generalist progression by creating flexible, transparent career routes that value diverse skills and aspirations.**
We're committed to clear, flexible career pathways that let both specialists and generalists thrive, without

being pushed into unsuitable management roles. Current structures often lack the flexibility to support dual career tracks, which can limit the development of specialist expertise. By valuing every route equally, supporting career exploration, and being transparent about role expectations, we unlock talent at every level. And for regulated professions, we'll keep the depth and accreditation that excellence requires.

4. **Championing diversity of thought and inclusive behaviours: The importance of embedding equity and inclusion in recruitment, leadership, and everyday practice.**

LGR is our platform to embed inclusive practices and celebrate diversity of thought at every level. We're tackling underrepresentation head-on – making sure all staff feel seen, heard, and valued. Our priorities include inclusive recruitment, diverse leadership pipelines, and open dialogue across teams. By championing different perspectives and lived experiences, we'll strengthen decision-making, build community trust, and create workforces that truly reflect the population they serve. This is particularly important given the different demographics of the resident populations of Gloucester City and the rest of Gloucestershire.

5. **Building leadership capability: Refers to the qualities, skills, and support needed for leaders to guide teams effectively through change and deliver high-quality services.**

Strong leadership is key to navigating change and delivering high-quality services. LGR creates valuable opportunities to grow leadership at every level. Through shared training, mentoring, and clear development pathways, the councils can support leadership growth while defining the qualities needed for the future. By investing in our leaders, we'll boost confidence, enhance engagement, and equip managers to lead with clarity, empathy, and purpose – amplifying the strengths already thriving across our teams.

6. **Creating anchor institutions for the wellbeing of our communities**

The 2021 Gloucestershire Director of Public Health's Annual Report "Sources of Strength"[1] described how 'anchor organisations' can support community health and wellbeing and help tackle inequalities in their places. Anchor organisations like the new unitary councils will take direct action in areas like employment policies, procurement, buildings, the environment, and place-shaping – leveraging our assets and influence for local benefit. As two of Gloucestershire's largest employers, we'll lead by example.

7. **Supporting staff who may not continue in the new unitary councils**

LGR is also about looking after our people. For those not transitioning into new roles within the new organisations, we'll offer tailored support – including CV writing, interview preparation, and access to redeployment resources – so that everyone feels respected, empowered, and ready for their next step. This compassionate approach values individual contributions and helps maintain positive organisational cultures throughout the change.

f. Technology & Data

Designing a digitally-enabled organisations for Gloucestershire

Since the announcement of Local Government Reorganisation (LGR), we have proactively engaged with the LGA and other councils that have already navigated this process, with a view to understand the realistic opportunities and learn from their experiences in Digital, Data and Technology (DDaT) transformation. This collaborative approach has enabled us to identify opportunities, challenges, and best practices, ensuring that DDaT aspirations in Gloucestershire are informed by real-world experience and are also closely aligned with the government's recently launched digital blueprint.

Putting residents and communities first is at the core of our DDaT approach. Our ambition is to design and deliver services that work for everyone – regardless of age, ability or access to technology. While we are investing in digital, data and technology to improve outcomes and experiences, we recognise that not everyone will choose or be able to access services online. That's why we will continue to offer alternative ways to get support and information, ensuring that no one is left behind. Supporting the proposed locality arrangements, our commitment is to deliver accessible, responsive and inclusive services, shaped by the needs of the people and communities we serve.

Our Digital, Data and Technology (DDaT) vision is to transform the experience of local public services in Gloucestershire by designing organisations truly fit for the digital age: innovatively, but efficiently, meeting the expectations and needs of our local people, communities and staff.

Importantly, we would not be starting from scratch. Instead, we would have two continuing authorities: Gloucestershire Unitary Council and Greater Gloucester Council. This approach offers significant advantages from a technology perspective, as it allows us to expand and redefine existing IT infrastructure rather than create entirely new systems. For Gloucestershire Unitary Council, core IT services such as email and website will continue to operate on the County Council's platforms, absorbing data and services from the merging districts. For Greater Gloucester Council, existing City Council systems will be maintained and extended to cover the newly included areas, ensuring residents and businesses in those locations are seamlessly integrated.

Further to this, we can build on already sector-leading examples of digital approaches delivering great customer experience and innovative service delivery. By bringing together county and district services across two unitaries – Greater Gloucester Council and Gloucestershire Unitary Council – it gives us the chance to simplify and standardise how services are delivered so customers receive a consistently good experience – no matter where they live or which service they use. For residents, this means easier access to services, less confusion, and no need to repeat information or navigate multiple systems. It allows us to focus resources where they are needed most, respond more quickly to local issues, and deliver support that is joined-up and reliable. Ultimately, this approach will help us build councils that are more efficient, more responsive, and better able to meet the needs of our communities.

What do we mean by digital, data and technology?

Digital:

This is about creating empowering and user-centred organisational cultures across both Gloucestershire Council and Greater Gloucester Council. We will invest in the right skills and use the right tools to deliver end-to-end online services that meet our residents' and users' needs, regardless of which authority they interact with. The goal is to make these services so simple and effective that people choose to use them.

Data:
This covers how we strategically and ethically use data to better manage our services and understand our residents, communities and place, enabling evidence-based decisions and the delivery of more personalised support. At the heart of our data use will be secure and ethical data sharing, improving interoperability across systems—both within and between the two authorities—and using insights to redesign services around real need.

Technology:
This refers to our approach to robust, secure, and flexible technology, from cloud and low-code platforms to open-source tools and responsible use of AI. Our goal is to deliver resilient, scalable services that support innovation and feel seamless to the user, with systems, tools and platforms working together so smoothly that the experience feels joined-up and intuitive, whether delivered by Gloucestershire Council or Greater Gloucester Council.

What difference will designing digitally-enabled organisations make?

Our residents and businesses across Gloucestershire will be able to access services that are consistent, proactive, accessible and responsive - joined up across both councils and their partners. By using data (where it makes sense to rather than 'just because'), to understand needs, we can deliver the right support at the right time, removing the need for customers to repeat information or navigate multiple systems. Whether people contact us online, by phone, by email or face-to-face, they will receive the same reliable service. We recognise that digital exclusion remains a challenge, with an estimated 30,000 to 40,000 adults in the county effectively offline and a further 80,000 to 100,000 adults missing out on the full benefits of the internet. Our commitment is to ensure that everyone - regardless of how they choose to engage - can access the support and services they need.

We also recognise that the demographic profile varies significantly between the two authorities. Gloucester has a higher proportion of young people, while the wider county has more older residents. This presents distinct challenges and opportunities for service design. Our digital, data, and technology solutions must be flexible and inclusive - supporting younger people's expectations for digital-first services in Gloucester, while ensuring older residents in the wider county can access support in ways that suit their needs, including non-digital channels. Alongside this, we are acutely aware of the impact of digital poverty, which affects both younger and older residents. Our commitment to accessibility and inclusion means we will work to address barriers such as lack of access to devices, connectivity, or digital skills, so that everyone, regardless of age, background or circumstance, can benefit from the support and services they need.

Our communities will have more opportunities to tell us what they think and participate in shaping services—our digital-focussed approach to service delivery will enable fairness, empowerment, responsiveness and trust. Digital platforms will make it easier to access data, share views, respond to consultations, and work in partnership with us. Through this approach we will enable communities to respond to local issues themselves, as well as target support and resources where they are needed most, strengthening local resilience.

Our staff will be equipped with the right tools and connected systems, working in organisations with a clear culture that values learning and collaboration. Routine tasks will be automated where possible, freeing time to focus on more complex issues and collaborating within and outside the organisations. Staff will also be trusted to experiment, learn and adapt - as well as being supported to develop new skills.

Our leadership will have access to high-quality, real-time information that enables confident decision-making. The opportunities that Local Government Reorganisation (LGR) offers in enabling joined-up data will

make it easier to see across systems, anticipate future needs, and direct resources to where they will have the greatest impact.

Our new unitary authorities will be better equipped to manage demand, streamline processes, and evolve services in innovative ways. By harnessing digital and data capabilities, we can break away from traditional models of local government service delivery, enabling more targeted support and adaptive operating models. At the same time, we're committed to becoming an employer of choice, attracting and retaining talented people by fostering a modern, inclusive, and purpose-driven workplace where staff feel empowered to make a real difference.

Our partners will be able to benefit from shared platforms, ethically aligned data and collaborative delivery models, making it easier to work across organisational boundaries. We will reduce duplication, remove barriers, and create seamless experiences for people who use multiple services across different agencies.

Strategic components of our approach

DDaT is central to making a real difference for Gloucestershire. We've identified seven key areas that will help us turn our ambition into action, each focused on delivering better outcomes for residents, communities and businesses.

Transformative leadership

Leadership in the new councils will encourage innovation that boldly challenges traditional ways of delivering local government services. Leaders will champion joined-up services across teams, organisations and sectors, adopting an agile, user-centred mindset that meets the expectations of an increasingly online society. This includes encouraging experimentation, removing barriers, and using data to inform decision-making. Leaders will be comfortable with 'build, test, learn' approaches, embracing continuous improvement over perfection at the first iteration. They will ask the right questions, equip staff with the tools to answer them, and act confidently on what data reveals.

Adaptive operating model

Our DDaT operating models will be flexible and responsive to changing needs. We will adopt reusable common components wherever possible, ensuring data portability and a consistent user experience across services. All services will be online by default (with alternative channels available), underpinned by a single digital process regardless of contact channel. This will remove unnecessary hand-offs, reduce duplication, and allow residents to get what they need more quickly and easily. Services will also join up with partners in the public and voluntary sectors, providing a simple and consistent experience across the whole system.

Reflecting the two continuing authorities, Gloucestershire Council will build on the County's existing IT infrastructure, absorbing the five districts, while Greater Gloucester Council will expand its current systems to cover new areas. This approach allows us to avoid creating new technology instances and instead focus on expanding and redefining what already works. Importantly, Greater Gloucester's scale and agility present a unique opportunity to act as a proving ground for new digital solutions and ways of working. By testing and refining approaches in Greater Gloucester, we can accelerate innovation and share successful models across both councils.

Data-informed decisions

Traditionally, local government has faced challenges with fragmented datasets, both within and between organisations, which has often made early intervention difficult. LGR offers a real opportunity to break down these silos, joining up services and data to enable earlier intervention, faster responses, and more effective prevention. By embedding evidence-based decision making and investing in analytics, predictive modelling

and AI, we will be better equipped to anticipate demand and continually improve our services.

Alongside this, we will prioritise robust data governance to ensure that information is used safely, securely, and ethically. Data should only be joined up across services and with partners where consent is given and where there is a strong use-case to do so. Clear principles and accountability will guide how we use AI and data in public services, helping us build trust and deliver value responsibly.

The unitary authorities, for example, will enable the implementation of a joined-up predictive analytics platform across adult and children's services, education, housing, and health. By pooling data that used to be locked in districts and county silos, the system will help identify early warning signs of safeguarding risks, such as school absence, housing instability, or repeat A&E visits, and trigger coordinated interventions when needed. An example of this type of benefit could be within our Multi Agency Safeguarding Hub, enabling real-time data sharing across agencies, standardised data formats and dashboards, predictive analytics to identify risk earlier, standardisation of risk thresholds and automation of routine processes (e.g. triage, referrals).

Our data approach will be underpinned by a clear blueprint for how we collect, store, transform, and analyse data, helping to embed a culture where decisions are consistently informed by data at every stage.

Customer-centred services

For the new organisations to effectively meet the needs of residents, businesses and communities, customer experience and our approach to digital must go hand-in-hand. Our aim is to deliver intuitive, accessible and consistently high-quality online services for all residents and customers; putting them at the heart of our service design will be essential. This will be facilitated by a single phone number, website and integrated digital services, incorporating tools like live chat and chatbots for 24/7 availability. With digital tools and AI capabilities, our customer services will be able to oversee cases and track progress more effectively across the organisations. By automating routine processes and communications wherever possible, we can free up staff to focus on supporting people with more complex needs, enhancing their impact and value. Whether online, by phone, or face-to-face, we're committed to delivering a consistent, joined-up experience for everyone, supported by a collaborative approach across all teams.

To build public trust in the councils, we will provide open access to our performance through dashboards, enabling residents to understand service levels and our reliability, and demonstrating our commitment to high standards. By connecting information across services, we can build a fuller picture of our residents' and communities' needs and respond in a more coordinated, thoughtful and person-centred way.

There will be an organisational-wide commitment to user-centred design principles and continuously improving the resident and customer experience. Testing will play a crucial role in this process: we will regularly test new services and features with real users, gathering feedback to ensure they are intuitive, accessible and genuinely meet people's needs. This approach will help us to identify and address issues early, refine our services, and make sure that what we deliver works well for everyone.

We also recognise that the population make-up varies between the two authorities, with Gloucester having a higher proportion of young people and the wider county more older residents. Our service design will reflect these differences, ensuring digital solutions are flexible and inclusive, and that digital poverty is addressed for all age groups.

Learning culture

To achieve our DDaT vision, we will need to create a culture that celebrates curiosity, is open to change, and encourages learning from others. We will retain the best of our existing organisational cultures while

fostering experimentation, collaboration and continuous learning.

We will work with national initiatives such as the Local Government Association and the Government Digital Service to improve digital consistency across the sector. We will think innovatively around how we learn from each other and others that have gone through LGR already (such as Innovation Greater Manchester, and Data Mill North) and look to launch a Gloucestershire innovation approach to pilot new ideas, bringing together the councils, the NHS, universities, technology start-ups and other partners.

We will also invest in organisation-wide digital skills and capabilities, including digital apprenticeships, to build a workforce that can deliver and sustain transformation.

Listening to our residents and stakeholders

To build online services that are truly inclusive and genuinely responsive to our residents' expectations and needs, it is important that we actively listen to them and recognise the challenges with digital exclusion across the county.

We plan to develop a digital engagement approach where Gloucestershire's residents and communities can easily provide feedback, join citizens' panels, and co-design services directly with us. Aligned to our proposed locality arrangements, we would make appropriate data and insights available so that our communities are empowered to design their own solutions to local concerns and issues. We would also look to collaborate with key partners, including the Gloucestershire VCSFE and parish councils, to deliver meaningful digital engagement and enhance digital skills within our communities.

We will use data and digital platforms to tailor engagement efforts based on factors such as location, interest, or demographics. Implementing robust feedback loops, embracing co-design practices, and openly sharing our approach will all contribute to improving inclusive service delivery and building trust with our residents. We are committed to ensuring those with limited or no digital access receive support through alternative channels that meet their needs, such as over the phone or through in-person appointments.

Regardless of the contact channel, the process and experience must feel consistent, joined up, and fair, ensuring that no one is left behind in our digital transformation.

Robust infrastructure

The success of the new councils will fundamentally rely on robust and dependable technology foundations. We will ensure that our infrastructure, devices, applications, and data are all up-to-date, secure, resilient, and dependable.

Where appropriate, we will migrate to cloud-based platforms to enhance resilience, but we will avoid simply replacing legacy systems in the cloud. Instead, we will look for opportunities to transform services using flexible, open-source technologies to promote transparency, efficiency and innovation.

New investment in technology infrastructure must be designed to be reliable, scalable, sustainable, and cyber-secure. Supporting this, we will develop clear design principles that will help to prioritise standardisation and interoperability. In addition, environmental sustainability will be a key consideration in all technology decisions, ensuring that our digital infrastructure supports the councils' broader climate and carbon reduction commitments.

Supporting our vision and the government's digital blueprint, we will invest in the right digital tools and capabilities to support agile service design, enabling teams to develop and iterate solutions more quickly,

consistently, and at a lower cost. Addressing 'shadow IT', where tools, software, apps or systems are procured without the approval of the central DDaT, will also be an important priority. Importantly, we will establish robust governance so that technology decisions are made centrally and are fully aligned with the councils' DDaT ambitions.

Our DDaT investments must go beyond devices and platforms to include connectivity. While 98.2% of properties in Gloucestershire now have access to superfast broadband, gaps remain, particularly in rural areas and among digitally excluded groups. As unitary councils, we will be better placed to coordinate infrastructure investment, work with national programmes, and ensure that all communities, regardless of geography, can benefit from modern, reliable and inclusive digital services.

Summary

The ambition to design digitally-enabled councils for Gloucestershire is both bold and necessary. By clearly defining what digital, data and technology mean in practice, and setting out a compelling vision supported by strategic components, we are laying the foundations for modern, responsive and inclusive organisations.

The risk of not embedding DDaT from the outset is significant. Without a clear digital strategy and robust DDaT foundations, the new councils risk building upon fragmented systems, inconsistent data, and outdated processes. This would not only increase costs and complexity—due to reliance on legacy infrastructure—but would also limit our ability to innovate, collaborate, and meet rising expectations.

Our approach is rooted in transformative leadership, adaptive operating models, and a culture of learning and collaboration, all underpinned by robust infrastructure and a commitment to understanding and delivering meaningful outcomes for Gloucestershire's residents and communities.

Case studies from across the county demonstrate the real-world impact of digital in improving outcomes, streamlining services, and supporting those who need us most. Yet we believe the true opportunity lies in working together across both councils to deliver consistent, high-quality outcomes for people living, working and visiting Gloucestershire.

As we move through the phases of LGR, our strategy will balance innovation with stability, ensuring that our customer focus is embedded from the outset with a clear roadmap for future transformation. The ability to test and iterate new approaches at pace in Greater Gloucester will support this ambition, helping us to refine solutions before scaling them across the wider system.

Ultimately, our DDaT focus will enable us to become proactive councils that deliver meaningful outcomes—making a real difference to our communities, to the people living and working in Gloucestershire, and to our own workforce. Our new councils will feel modern, human and trustworthy - designed around the people we serve and powered by the best of digital, technology and data insight.

8. The Overall Financial Case

Financial modelling and assumptions

Purpose - To summarise the assumptions and outputs from the financial modelling undertaken to inform the Local Government Reorganisation options appraisal.

Assumptions - All options were modelled on Revenue Outturns 2023/24, with all figures inflated so that the total Council Tax requirement for all councils was equal to the Council Tax requirements agreed by each council as part of the 2025/26 budget setting processes.

Within this report, 3 options are considered as follows:

- Option A - A single County-wide Unitary Council
- Option B - 2 Council model - split geographically East/West
- Option C - 2 Council model - split between an expanded Greater Gloucester City and Gloucestershire (the remainder of the County)

Throughout this options appraisal, all savings are considered against a 'stand-still' position. Savings are projected against current needs, current costs and current allocations of grants. None of the options considered include assumptions relating to changes in levels of reserves, levels of future needs or changes to resource allocation; these factors are assumed to have the same impact on each option. This approach is required to demonstrate the varying performance of each option to generate efficiencies and realise savings. Similarly, this options appraisal is focussed on appraising structural proposition, rather than appraising detailed system wide, organisational and service level designs. As such, broad but evidence-based assumptions have been used to inform the financial models for each option, including findings from previous LGR programmes, projections from successful recent LGR proposals and Interim LGR Plan proposals for other two-tier areas.

General efficiencies - Areas for savings were calculated as categories of service department expenditure where there is an overlap of spending between Districts councils and the County Council, split between staffing, other expenditure and fees and charges income and other income. There are no assumed efficiencies within Adults or Children's Social Care, nor in Education services. The following table sets out the modelled saving targets for each option:

	A	B	C
Staff saving	3.25%	2.50%	2.50%
Non-staff saving	3.25%	2.50%	2.50%
Fees & Charges Income	2.00%	1.50%	1.75%

The saving assumptions are based on there being greater efficiencies the more authorities that are combined (and potentially offsetting efficiencies with additional costs for splitting services for options including multiple councils). Fees and charges income can be increased through alignment of fees and charges across the county - the lower the number of councils, the greater the opportunity to rationalise these charges.

Ongoing additional costs / savings - The next consideration was to look at whether the specifics of any

individual option gives rise to ongoing additional costs (such as costs for more members) or leads to ongoing savings (for example through prevention). The following table sets out the net ongoing costs and savings (£m's) assumed in each option. These are taken to adjust the general level of savings as suggested above.

	A (£m)	B (£m)	C (£m)
Duplicated Management Teams	(4.734)	(4.734)	(4.734)
Additional Management Teams	0.00	1.750	1.750
Member savings	(1.850)	(1.850)	(1.850)
Additional Member's allowances	0.000	0.400	0.400
Savings from existing shared services	1.000	1.000	1.000
Ongoing service disaggregation costs	0.000	1.000	1.000
Enhancing local democracy	0.000	0.000	0.966
TOTAL additional costs / (savings)	**(5.584)**	**(2.684)**	**(1.718)**

Duplicated Management Teams savings are calculated on the basis that the number of senior posts for a single authority are likely to be comparable to the current County Council structure (albeit the responsibilities will be different with the combining of County and District services). Thus base savings are taken by combining the salaries of all District Councils in the county, based upon the latest Senior Officers' Pay Report or latest Pay Policy Statement) with an allowance for oncosts. Where options include more than one new council, costs are calculated based on costs of 1 Chief Executive, 4 Service Directors and 10 Assistant Directors for each new Council.

Members savings are based upon a base position of moving to a single Council with 100 Members (we understand that in both options A and B the current aggregate proposal is for 110 Councillors, which would result in an additional annual forecast cost of £0.12m per year in each option). Using the existing Gloucestershire County Council rates, allowances are given for 1 Leader, 3 Group Leaders, 9 Cabinet Members, 20 Committee Chairs and 67 Members without additional responsibilities. These costs (£1.20m) are compared against the total allowances for Members across all County and District Councils in Gloucestershire based upon the latest available published details (£3.05m) - the difference is the projected saving. For each additional Council, there will be the need duplication of all the responsibility roles (Leader, Group Leaders, Cabinet Members and Committee Chairs) totalling £0.40m.

For Option C there is an additional cost already built in to the model for Enhancing Local Democracy. These are costs associated with a policy approach to increase expenditure on democratic representation at a local level, through both additional Councillors and additional working and resourcing at a more local level.

Savings from existing shared services are savings that have already been achieved through partnership working between councils in the county. £1m is the projected savings already made by these joint arrangements, thus they are subtracted from the expected efficiency savings to avoid double counting, as they have already been achieved.

Service disaggregation costs are on-going additional costs based upon splitting services currently provided at a county-wide level, such as requiring duplicate ICT systems and licences for maintaining records and potentially additional staff due to inefficiencies in splitting these services.

Long-term impact of these savings combined - Combining the impact of these two sets of savings shows the potential long-term savings from each of these models, based upon these over the various categories of

income and expenditure - at this stage in the process, figures are presented for all new Councils combined; for the purposes of this analysis no attempt is made to apportion costs and savings to specific newly formed authorities.

Option A - Single Authority

Category	2023/4 Outturn inflated (£m)	General efficiency (£m)	Further specific costs / (savings) (£m)	Projected expenditure / (Income) (£m)	Ongoing saving (£m)
Employee Costs	502.100	(3.502)	(6.334)	492.264	9.836
Running Expenses	989.692	(8.341)	0.750	982.101	7.591
Fees & Charges	(165.837)	(3.317)	0.000	(169.154)	3.317
Other Income	(155.666)	(0.000)	0.000	(155.666)	0.000
Non-Dept (Inc) / Exp *	(704.051)	(0.000)	0.000	(704.051)	0.000
Council Tax Req	466.237	(15.160)	(5.584)	445.494	**20.744**

Option B - East / West split

Category	2023/4 Outturn inflated (£m)	General efficiency (£m)	Further specific costs / (savings) (£m)	Projected expenditure / (Income) (£m)	Ongoing saving (£m)
Employee Costs	502.100	(2.694)	(4.184)	495.222	6.878
Running Expenses	989.692	(6.416)	1.750	985.026	4.666
Fees & Charges	(165.837)	(2.488)	0.000	(168.325)	2.488
Other Income	(155.666)	(0.000)	0.000	(155.666)	0.000
Non-Dept (Inc) / Exp *	(704.051)	(0.000)	0.000	(704.051)	0.000
Council Tax Req	466.237	(11.597)	(2.434)	452.206	**14.031**

Option C - Greater Gloucester & Gloucestershire Unitary

Category	2023/4 Outturn inflated (£m)	General efficiency (£m)	Further specific costs / (savings) (£m)	Projected expenditure / (Income) (£m)	Ongoing saving (£m)
Employee Costs	502.100	(2.694)	(3.218)	496.188	5.912
Running Expenses	989.692	(6.416)	1.750	985.026	4.666
Fees & Charges	(165.837)	(2.902)	0.000	(168.740)	2.902
Other Income	(155.666)	(0.000)	0.000	(155.666)	0.000
Non-Dept (Inc) / Exp *	(704.051)	(0.000)	0.000	(704.051)	0.000
Council Tax Req	466.237	(12.012)	(1.468)	452.757	**13.480**

* This includes all other elements of Council Income and Expenditure, including Housing Benefits, Levies, Capital Financing, Non-service grants and appropriations / use of reserves (elements considered outside service reporting on Government - Revenue Outturn forms)

The following table sets out the ongoing savings as a percentage. This is calculated in three ways:

- As a percentage of gross service costs (ie employee costs and running expenses)
- As a percentage of net service costs (ie employee costs and running expenses less service income)
- As a percentage of Council Tax requirement (ie all costs including non-service specific grants, financing costs, precepts and use of reserves)

Category	A (£m)	B (£m)	C (£m)
Ongoing saving	20.744	14.031	13.480
Savings as a percentage of:			
Gross Service Cost (£1,491.792m)	1.4%	0.9%	0.9%
Net Service Cost (£1,170.289m)	1.8%	1.2%	1.2%
Council Tax Requirement (£466.237m)	4.4%	3.0%	2.9%

One-off costs and time to realise savings Each option was considered for one-off costs and how quickly savings could be achieved. The breakdown of these costs varies from option to option and can be seen within the model. For most costs these were given a direct cost. The exception was redundancy costs that were calculated as a percentage of employee costs saved (this forecast includes both the direct costs and any pension strain). A summary of these one-off costs per model are as follows.

	A	B	C
Redundancy (%age of employee costs saved)	120%	120%	120%
Other one-off cost (£m)	10.950	20.100	20.100

Although an indicative breakdown of transition costs is given, it is considered that the overall quantum is more important that the specific categories. Local decisions will determine how much of this work is carried out in-house compared to with external support, which in turn may adjust the allocation of these budgets. These costs are broken down as follows:

Category	A (£m)	B (£m)	C (£m)
Redundancy Costs (A)	9.883	6.813	6.813
Rebranding / Comms	0.250	0.500	0.500
Public consultation	0.200	0.400	0.400
Transition support / remodelling costs	3.000	5.000	5.000
Programme Management	1.000	2.000	2.000
Legal costs (contract novation, new constitutions)	1.000	1.250	1.250

ICT costs	2.000	4.000	4.000
Contingency	2.000	4.000	4.000
Shadow operations	0.500	1.000	1.000
Additional agency year 1	1.000	0.750	0.750
HR Support for transition / TUPE etc	0.000	1.200	1.200
Sub-Total Non-Redundancy Costs (B)	10.950	20.100	20.100
Total One-off Costs (A+B)	20.833	26.913	26.913

Consideration was also given to how quickly expected savings would be realised. Greater disaggregation of existing county-level services results in a longer projected time to fully realise savings, with the assumptions and impact on early-year savings projected below:

	A	B	C
%age saved - Year 1	33%	30%	30%
%age saved - Year 2	67%	60%	60%
%age saved - Year 3	100%	80%	80%
%age saved - Year 4	100%	90%	90%
%age saved - Year 5	100%	100%	100%
Saving before one-off costs	£m	£m	£m
Ongoing saving - Year 1	6.915	4.209	4.044
Ongoing saving - Year 2	13.829	8.419	8.088
Ongoing saving -Year 3	20.744	11.225	10.784
Ongoing saving - Year 4	20.744	12.628	12.132
Ongoing saving - Year 5 (and ongoing)	20.744	14.031	13.480

Summary of financial modelling - The following table sets out the key metrics from each of the options:

	A	B	C
One-off costs (£m)	20.833	26.913	26.913
Ongoing annual savings (£m) *	20.744	14.031	13.480
10 Year Savings (£m)	165.859	93.757	89.015
Payback period (years)	3	4	4

* Annual savings once fully ramped up

Financial Sustainability Assessment

Steady State Assessment

To assess the financial sustainability of this proposal we assessed what the 'steady state' position would be after savings had stabilised.

This modelling followed the following steps:

- Income and expenditure from 2023-24 RO forms are split between new authorities based upon population, except children's social care, which was split on number of supported cases
- General efficiencies applied as described above
- Judgement used to split and allocate ongoing additional costs / savings specific between the authorities
- Comparing the Council Tax Requirement at 2025/26 prices against the ability to raise that funding from the current Council Tax base (adjusting for proposed boundary changes)

The outcome from this analysis was that based upon the levels of savings generated and the allocations made, both authorities could more than raise the required level of funding from their Council Tax base within existing Council Tax rates.

Transition Assessment

After this initial assessment, the costs of getting to this overall 'steady state' were assessed. These were calculated as the following:

- One-off costs (as described above)
- Ongoing savings shortfall – these are defined as the difference between the maximum annual savings and the annual projected savings, due to the time for change to occur and new systems and processes to bed in

For this proposal [Option C] the total costs are calculated as follows:

	Year 1 (£m)	Year 2 (£m)	Year 3 (£m)	Year 4 (£m)	Year 5 (£m)	Total (£m)
Projected saving	*4.044*	*8.088*	*10.784*	*12.132*	*13.480*	*48.528*
Steady state saving	*13.480*	*13.480*	*13.480*	*13.480*	*13.480*	*67.400*
Difference	9.436	5.392	2.696	1.348	0.000	18.872
One-off costs	26.913	0.000	0.000	0.000	0.000	26.913
TOTAL	36.349	5.392	2.696	1.348	0.000	**45.785**

To assess how easily this total cost of transition could be borne across the county, this figure is compared to the total reserves held by existing councils within the county. The stated position based upon 1st April 2025 submitted Revenue Outturn reports are presented below:

Reserve type	£m
Unallocated Financial Reserves	44.193
Earmarked reserves: Planned future revenue and capital spending	187.095

Total reserves potential available	**231.288**

Note that reserves held for schools, public health, existing contractual commitments, risks or budget stabilisation were not considered. The reserves figures have not been updated for GCC following the updated outturn positions, this is not material in the overall figures presented. All figures are calculated based on assumptions.

There are several assumptions and factors underpinning this assessment:

- It assumes current levels of external support and splitting on a population basis
- No assessment is made of future needs, changes in demand, levels of reserves or changes to funding methodologies
- It assumes a shared pool of reserves and transition costs are met from this pool before allocation decisions

Based on these assumptions, the costs represent less than 20% of relevant reserves, suggesting overall costs of transition could comfortably be contained, without even considering disposal of excess assets such as surplus properties. Thus this proposal [Option C] is sustainable long-term and transition to that point can be contained within existing resources.

Conclusion - A single authority is projected to generate the most significant efficiencies and lead to the quickest payback of transition costs. These savings should however be considered alongside wider economic benefits and disbenefits to the county (such as changes to health, investment, job creation / retention, culture and tourism) to get a fairer overall reflection of the impact of changes to the county.

Differences in outputs compared to models used in other submissions - The key differences between assumptions in this modelling compared to other published local submissions are:

- Redundancy costs are much greater within this model for all options (120% of employment costs saved compared to much less in other observed models) - our assumption is based upon experience at previously combined authorities and includes pension strain for people taking redundancy.
- Lower additional ongoing costs for social care following disaggregation - informed by the findings of the Impower report commissioned by DCN (https://www.districtcouncils.info/wp-content/uploads/Impower-DCN-ASC-LGR-Report-2025-FINAL-compressed-version.pdf) - which states "*There are no economies of scale in delivering social care and in some cases, there is evidence that larger systems introduce diseconomies*"; although allowances have still been made for additional leadership roles and ICT relating to running an additional ICT system.
- Lower ongoing savings modelled across all options and a longer time to realise these - informed by findings in previous merged authorities showing that savings took longer to achieve than anticipated and were overestimated. As an example: https://www.westmorlandandfurness.gov.uk/your-council/finance/westmorland-and-furness-council-productivity-plan is projecting £1.293m of unitary specific efficiencies after 4 years of operations (this being one of two new unitary councils formed in Cumbria).
- This model includes a modest increase in income based upon reviewing and aligning fees & charges; this increase is consistent with previous reviews of fees & charges in single authority situations (i.e. there should be a greater ability to raise income as there is already differential in fees charged across the existing councils).
- This model makes explicit adjustments for savings already realised in terms of shared services and makes an expenditure allowance for enhanced localised democracy across all options; other submitted models do not make such allowances.
- This model does not attempt to make assumptions about any of the following:

  - Changes to future service demands, which cannot be projected with any degree of certainty
  - Realisation of future savings plans
  - Changes to Council Tax collection rates, which cannot be projected with any degree of certainty
  - Re-distributional impact of Fairer Funding reforms, which cannot be projected with any degree of certainty
  - Ceasing any specific grant support that is currently allocated within the county (such as floor payments, specific grants)
  - Changes to debt and associated debt costs, that could be offset via sale of surplus assets, which cannot be projected with any degree of certainty
- This model assumes greater transition costs across all options, again based upon experience of costs from previous reorganisation; although the split of these costs is different between models, this split is highly dependent upon how the new organisation(s) choose to resource the required transformation and the reliance on internal versus external support (Westmorland and Furness, as one of two new councils in the region were themselves allocated £10m to facilitate transformation in Cumbria as referenced in the same report as linked above). Grant Thornton referenced an example of transformation costs reaching over £50m (see box 1 below):

Box 1: Example of under-estimation and transformation costs associated with LGR

> Transformation needs to be fully costed and those costs kept under control. For example, in one council the estimated transformation programme costs increased significantly from £29.5 million in November 2019 to £52.12 million by February 2024. Transformation programmes need effective programme management and regular progress reporting in public to elected members is essential. Elected members need enough evidence to challenge delivery and ensure officers are taking corrective action if needed.

Source: https://www.grantthornton.co.uk/globalassets/1.-member-firms/united-kingdom/pdf/publication/2024/report---learning-from-the-new-unitary-councils_v08.pdf

Economic Case

Wider Economic Benefit Model

Purpose - To summarise the assumptions and outputs from the benefits modelling undertaken to inform Local Government Reorganisation in the options appraisal. This builds on the work undertaken within the financial modelling and combines the results from this with estimates of wider economic benefits and disbenefits from various LGR options.

Options modelled - Within this report, 3 options are considered as follows:

- Option A - A single County-wide Unitary Council
- Option B - 2 Council model - split geographically East/West
- Option C - 2 Council model - split between an expanded Greater Gloucester City and Gloucestershire Unitary (the remainder of the County)

Identifying wider economic impact - Economic benefits have been based upon local expected outputs, converted to financial outputs through established models. The following approach has been used consistently in developing the benefits estimation:

- Limited to one broad measure per key area to avoid duplication (or removal of any overlapping figures)
- Implicit optimism bias included within figures, with greater allowance where national data is used (see below for further details)
- Where local baseline data was unavailable, no economic benefit has been calculated and any such expected benefits have been included in the non-monetised impact instead
- When a range of outputs were forecast, then Monte Carlo analysis was undertaken, multiplying each outcome with the estimated probability of that outcome - due to the uncertainty implied via this approach an increased optimism bias / deadweight weighting is used (see Additionality factors section below)

An exercise was undertaken with commissioning council officers to consider strategic factors that are likely to be influenced by the future structure of local government and where those outcomes are likely to be materially different between the options. Table 1 presents these outcomes, the linked measure used for calculating the economic impact and the justification for their inclusion:

Table 1: Measures used for calculating economic impact

Outcome	Output measure	Reason for inclusion
Job creation	Gross Value Added for jobs created	A combination of impact of public sector losses in county from re-organisation + impact of an enhanced economic strategy tailored to urban/rural needs in each unitary
Small business survival	Gross Value Added for increased start-up / SME survival rates	Greater aligned economic development with local strengths and needs - where tighter focus on specific areas
Investment within area / region	Investment within area	Gloucester City has a strong track record of working to engage partners in regeneration within its boundaries - there is a risk that this is

		diluted without a specific council carrying out these duties
Cultural engagement	Change in people engaging in cultural activities	The closer the link between each council and its residents will allow for more engagement and celebration of cultural identities - conversely the more distant, the more likely for there to be disengagement from current activity levels
Crime & disorder	Change in recorded crime	Exceptional prevention focused work currently taking place within Districts - risk of this being diluted through merging into larger councils
Visitor economy	Visitor spend in region	Risk of loss of promotion of urban areas if integrated into wider areas including the Cotswolds and the Forest of Dean - the appeal of the area is very diverse, making it harder for a council with a mix of urban and rural areas to market the appeal to those different visitor groups
Homelessness prevention	Number of homelessness applications	Solutions to homelessness (or the factors that help prevent it) are often household-specific and reliant on a high degree of flexibility, creativity, local connections and partner organisations, which are easier to build and sustain on a smaller footprint.
Children social care	Costs of looked after children	Nationally evidenced report showing links between average cost of provision and size of councils
Adult social care	Costs of residential and nursing care	National evidenced report showing links between average cost of provision and size of councils

Impact calculation - For each output measure above, a baseline figure was determined, the range of outcomes likely to be achieved and an economic impact of each output produced. The detailed calculations for this can be seen in Appendix C. Once the impact is assessed these are adjusted in line with factors included within the Additionality Guide. These adjustments ensure that naturally occurring increases are considered part of the benefits for this project.

The following factors elements were considered for each benefit:

- Leakage - benefits going to people outside the target area (e.g. health benefits from people coming from overseas participating in leisure activities generated by a scheme).
- Displacement - benefits lost because individuals swap from another activity which would also have provided similar benefits (e.g. when a job created is taken by someone already in full time employment and their previous role is not re-filled).
- Substitution - benefits lost because companies change their decisions because of the scheme (e.g. they don't repair a building themselves, because they can get a grant to support it).
- Economic Multiplier - the wider supply chain and regional impact of the benefit (e.g. construction work having a beneficial impact on the local supply chain).
- Deadweight - what would happen even if the project didn't go ahead (e.g. general rises in commercial or house prices).

Each economic impact was assessed forthe likely impact of each factor, using the reference cases set out in the Additionality Guide and HCA Additionality Guide as starting points, supplemented with local knowledge and sector specific research. Appendix C sets out for each benefit the values used for each factor and the reasoning behind this.

All benefits were then combined with the direct calculated impact from the financial model (both the ongoing savings and transition costs). All results are then discounted by the Government's Green Book value of 3.5% per year. Discounting is used to reflect the fact that a benefit today should be valued higher that the same benefit in the future. The overall economic impact of each option is presented in table 2 below:

Table 2: Economic impact of options

Category	**Option A**			
Economic impact category	**Gross impact (£m)**	**Additionality adjustment (£m)**	**Discount (£m)**	**NPV of impact (£m)**
Economic benefits				
Ongoing savings	186.696	0.000	(33.993)	152.703
Sub-total economic benefits **(A)**	**186.696**	**0.000**	**(33.993)**	**152.703**
Economic disbenefits				
Transition costs	(20.833)	0.000	0.000	(20.833)
Job Creation	(67.640)	30.165	6.309	(31.167)
Small Business Survival	(106.195)	86.841	3.258	(16.096)
Investment in area / region	(17.845)	3.102	2.482	(12.262)
Cultural Engagement	(57.686)	36.379	3.587	(17.720)
Crime & Disorder	(19.060)	4.765	2.406	(11.888)
Visitor Economy	(12.421)	5.539	1.158	(5.723)
Homelessness Prevention	(120.069)	37.942	13.825	(68.302)
Sub-total economic disbenefits **(B)**	**(421.749)**	**204.733**	**33.025**	**(183.991)**
Overall economic impact (A+B)	**(235.052)**	**204.733**	**(0.967)**	**(31.288)**

Category	**Option B**			
Economic impact category	**Gross impact (£m)**	**Additionality adjustment (£m)**	**Discount (£m)**	**NPV of impact (£m)**
Economic benefits				
Ongoing savings	120.667	0.000	(22.459)	98.208
Children Social Care	88.091	(35.237)	(9.688)	43.167
Adult Social Care	106.181	(42.472)	(11.677)	52.032
Sub-total economic benefits **(A)**	**314.939**	**(77.709)**	**(43.823)**	**193.407**
Economic disbenefits				

Transition costs	(26.913)	0.000	0.000	(26.913)
Job Creation	(33.820)	15.082	3.154	(15.583)
Small Business Survival	(53.097)	43.420	1.629	(8.048)
Investment in area / region	(8.923)	1.551	1.241	(6.131)
Cultural Engagement	(28.843)	18.190	1.793	(8.860)
Crime & Disorder	(9.530)	2.382	1.203	(5.944)
Visitor Economy	(6.210)	2.770	0.579	(2.862)
Homelessness Prevention	(60.034)	18.971	6.913	(34.151)
Sub-total economic disbenefits **(B)**	**(227.371)**	**102.366**	**16.513**	**(108.492)**
Overall economic impact (A+B)	**87.568**	**24.658**	**(27.311)**	**84.915**

Category	Option C			
Economic impact category	**Gross impact (£m)**	**Additionality adjustment (£m)**	**Discount (£m)**	**NPV of impact (£m)**
Economic benefits				
Ongoing savings	115.928	0.000	(21.577)	94.351
Children Social Care	30.776	(12.310)	(3.385)	15.081
Sub-total economic benefits **(A)**	**146.704**	**(12.310)**	**(24.961)**	**109.432**
Economic disbenefits				
One-off costs	(26.913)	0.000	0.000	(26.913)
Adults Social Care	(31.026)	12.410	3.412	(15.024)
Sub-total economic disbenefits **(B)**	**(57.939)**	**12.410**	**3.412**	**(42.117)**
Overall economic impact (A+B)	**88.765**	**0.100**	**(21.549)**	**67.316**

Note: Where a category is contained in one option and not in others, then it is assumed performance remains at current (pre-reorganisation) levels; therefore, a neutral or zero impact.

An overall summary is presented as table 3, combining the "Ongoing savings" and "One-off costs" as the Net Savings and combining all the other factors as the Other Economic Impact, to split the direct savings to the Council and the wider economic impact to residents.

Table 3: Overall Economic Impact (NPV)

	A	B	C
Net Savings NPV (£m @ 3.5%)	131.870	71.295	67.438
Other Economic Impact NPV (£m @ 3.5%)	(163.158)	13.620	(0.122)
Overall Economic impact NPV (£m at 3.5%)	**(31.288)**	**84.915**	**67.316**

This would suggest that while the single unitary authority option has the greatest direct financial savings to the councils, when combined with the wider economic impact on the region, then Option B, the East/West split provides the best overall economic impact.

Non-Quantified Benefits / Opportunities

Not all benefits are quantifiable; some may lack baseline information, others (such as satisfaction ratings) may be very difficult to translate into an economic impact. Table 4 sets out other identified opportunities or benefits and which model(s) most benefit.

Table 4: Summary of Non-Quantifiable Benefits

Area	Description	Option(s) benefitting

Strategic Authority changes	Options including a split of councils would facilitate governance arrangements for joining different combined authorities, which in turn could support job creation, green travel and education opportunities	B & C
Local democracy	Decisions taken at a more local level may lead to more engagement in local government, leading to increase voter turnout and satisfaction with performance	C
Engagement for other public bodies	With a single council, other public bodies (such as NHS and police) will have to engage and consult with fewer bodies and would be less likely to get contradicting responses	A
Health via Sport	Research based upon previous rounds of local government reorganisation shows an inverse relationship between size of authorities and sport and leisure performance metrics[7]	B & C

Conclusion - Whilst a single local authority may provide the greatest degree of direct savings, there many wider economic disbenefits of such an approach. Recent research carried out by Peopletoo on behalf of the District Councils Network shows a diseconomy of scale for both Adult and Children Social Care residential placements, with higher unit costs incurred by councils with greater than 500,000 population. Furthermore, the greater number of public sector jobs at risk and the risk of lack of focus upon major urban areas creates further risks to job retention, social and cultural identity and tourism.

Carrying out an overall economic impact assessment, in line with Government best practice in major projects would suggest that the wider economic impacts more than offset this bigger direct financial saving and that the greatest overall economic impact is Option B, the East/West model, followed by Option C, with the single county unitary being the least beneficial overall to the area.

[7] "Unitary Local Government", House of Commons Library, March 2025 (page 31) "a linear negative scale effect for road maintenance and sport participation" https://researchbriefings.files.parliament.uk/documents/CBP-9056/CBP-9056.pdf

9. Listening to Gloucestershire

Engagement to Discover and Improve

Our engagement approach has been shaped by the guidance within the invitation to submit proposals: it's been rooted in genuine discovery and learning, not campaigning for any particular outcome. This focus on open engagement has been enabled by:

- **Unified, option-neutral engagement:** We agreed that the engagement around all three unitary options would be developed collectively, without using the activity to campaign or advocate for preferences
- **Strong political leadership:** Gloucestershire's Leaders set the tone – driving a shared engagement plan across councils
- **Clear accountability:** A lead Chief Executive was appointed to oversee all communications and engagement activity
- **Joint working:** Every council played an active role through a joint communications and engagement workstream
- **Prioritised investment:** We prioritised MHCLG LGR funding to support joint engagement activities.

These early actions, underpinned by a clear sense of purpose, enabled us to deliver a wide range of non-partisan engagement activities – each designed to listen, learn, and feed real insights back into the development of our proposals.

Our key engagement activity

Our joint engagement activity from March 2025 – September 2025 is summarised in the table below:

Engagement type	Key activities
Public	• Option-neutral Future Gloucestershire microsite[8] presenting clear, factual information • Online survey, designed to discover values, concerns and ambitions of local people (3,112 completed surveys, including 1,480 open-text responses) • In-person community events, enabling over 500 one-to-one conversations (12 events in total, two in each district, plus two additional events in and around Gloucester) • Two county-wide public webinars • Information leaflets and display banners (used principally at council offices and community events) • Regular social media information updates and paid advertising for wider promotion of the survey.
Place	• Engagement webinar for VCFSE (hosted by Gloucestershire VCS Alliance) with over 100 attendees • Engagement webinar for Town and Parish Councils hosted by GAPTC with over 100 attendees

[8] https://futuregloucestershire.org.uk

Engagement type	Key activities
	• Additional initial awareness-raising meeting on the Greater Gloucester proposal for potentially affected neighbouring Parish Councils • Representation on Place Model workstream from NHS (ICB and providers), GAPTC, OPCC, SLCC, and VCS Alliance.
Staff	• Regular LGR staff communications and briefings • Senior officers from principal councils represented on all LGR workstreams, with different Chief Executives acting to lead and chair • Specialist service officers engaged in structured, cross-council aggregation and disaggregation workshops.
Council members	• Interactive all-member webinars • FAQs and other written briefings • Bespoke briefing and democratic processes delivered by individual councils.
MPs[9]	• Gloucestershire County Council Leader and Chief Executive monthly engagement with Gloucestershire MPs • Other district ad hoc engagement with local MPs
Other	• In addition to Place (above), workstreams conducted bespoke engagement as relevant. For example, the Vision and Ambition workstream conducted a range of briefings with senior district leaders to develop an understanding of place-based perspectives.

The online survey and in-person community events were co-designed and facilitated by an external specialist engagement organisation, *Cratus*. Their independent report can be found in Appendix E.

Our learning and insights

Our learning themes synthesise the responses from a variety of methods and types used. As far as possible, we have avoided significant focus in this proposal on feedback on the relative merits of structural options, since the primary aim of engagement was to discover common concerns and ambitions of local people and organisations. However, some of this data, from the public survey and stakeholder interviews is shown for transparency. It should not be read as representative data on the preferences of the public and partners.

Three big themes have emerged:

1. Belonging in Gloucestershire
2. Service improvement
3. Vulnerable people and communities

[9] At a meeting of all Principal Authority Leaders on 09/10/2025 it was agreed that Gloucestershire Councils would collectively engage with all local MPs to understand their preferences and comments in the light of the published proposals. This process will be conducted to develop an objective understanding of MP views to inform both Gloucestershire Councils and Ministers.

Theme 1: Belonging in Gloucestershire

Our engagement revealed something powerful: people in Gloucestershire feel a strong sense of belonging - whether that's to a village, an estate, a district, or the county as a whole. Local identity runs deep, and it's clear that "home" means different things to different people.

This insight is crucial. It shows that the new council must enable participation and engagement at every level - recognising and supporting the many overlapping communities that make Gloucestershire unique.

Key actions to shape our proposals: Belonging in Gloucestershire (Theme 1)	
Place Model	Proposals for our locality arrangements have avoided prematurely drawing 'lines on maps'. We will deliver a carefully designed engagement and consultation process to develop the spatial scale, competency, and differentiation (by Place) of our Neighbourhood Partnerships. This commitment is reflected in our implementation roadmap.
Future Operating Model (FOM)	The differentiation of Gloucestershire's places is recognised in both the design principles and key features of the Future Operating Model. We have reflected place and identity strongly in engagement, commissioning, and service delivery features.

Theme 2: Service Improvement and Efficiency

Our survey captured a wealth of feedback on council services. Most areas scored well, with the majority of residents rating services as 'good' or 'very good'. However, roads, pavements, and streetlights stood out as clear concerns.

When asked what should shape future council services, 'community' - meaning representation, voice, and engagement - was the top priority. 'Transport' (including public transport, road maintenance, and connectivity) also featured strongly.

Stakeholder interviews reinforced this theme, highlighting the need for simpler, more efficient services and better integration with partners.

The message is clear: while there are specific areas to address, any improvement must be rooted in local context and connectivity - making sure services work for people and places across Gloucestershire.

Key actions to shape our proposals: Service Improvement and Efficiency (Theme 2)	
Vision and Ambition	Our vision and ambition includes a specific focus on the use of data to transform transport and wider public services. The feedback we have received on public transport in particular has assisted with shaping this ambition. Our vision and ambition also reflects the excitement and energy in the Gloucestershire business community to drive growth. We pay particular attention to the economic opportunities in Gloucestershire, and the desire to use LGR to accelerate our trajectory of breakthrough innovation in economic clusters, such as cyber, clean energy, and agri-tech.
Future Operating Model (FOM)	Our strategic enablement feature within the FOM is specifically designed to create capacity and capability to drive improvement and transformation.
Place and FOM	Our neighbourhood model is linked to service delivery within the FOM, with a proposed specification to tailor on a locality basis, addressing some of the feedback about different satisfaction and experience in different parts of Gloucestershire.
Financial Case	Our financial case shows our desire not simply to reorganise, but to transform. We will reinvest structural and transformation savings into services that people want to see improve. The councils will feel local and responsive but be powered by scale and efficiency for the benefit of everyone.

Theme 3: Vulnerable people and communities

A key theme from our engagement with partners was the opportunity for the new council to do more for Gloucestershire's most vulnerable people and communities.

- **Community development and local engagement must be front and centre.**
- **There's real appetite for public sector reform.** From the emerging Neighbourhood Health Service to new powers for neighbourhood working, they see LGR as a chance to join up regeneration, health, and community development - especially where VCFSE organisations are already leading the way.
- **Tackling deep-rooted inequalities is essential.** We know there are sharp divides between urban and rural areas, and that data and lived experience is important to drive local action and smarter service design. This is a particular strength of the Gloucester/Gloucestershire option, where the creation of distinct unitary councils to tackle the significantly different socio-economic challenges faced in Gloucester to those experienced in most of the rest of the county.

Respondents have made it clear that LGR offers a huge opportunity to address these challenges and opportunities.

Key actions to shape our proposals: Vulnerable people and communities (Theme 3)	
Vision and Ambition	Our vision makes it clear that we want to use LGR to spark a transformation in community empowerment. We can be closer to communities and people than before, e.g. utilising better and more widely the 'hub' approach to delivering preventive, community-led activity, as well as more tailored services for vulnerable people, families, and communities. We are also clear in our vision that we will more consciously link with partners on wellbeing, housing, climate action, and nature recovery – feedback is showing these are connected issues for local people.
Data, Digital and Technology (DDaT)	Our proposals are clear there are major opportunities to use DDaT to drive better environments, interventions, and services for vulnerable people. We have set out a bold ambition to develop joined-up predictive analytics platforms across adult and children's services, education, housing, and health.
Place	Our place research has revealed a wealth of current good practice in evidenced-based community development. We have hard-wired into our neighbourhood proposals a focus on community development, supported by data insight, the skills of our public health team, and dedicated staff and other resources.

Feedback from engagement activity with Town and Parish Councils on the Greater Gloucester model

Gloucester City Council co-designed and co-facilitated with GAPTC an initial engagement event for the twenty or so town and parish councils within and surrounding the city of Gloucester (which along with Cheltenham, is largely unparished) and who would be most affected by the proposed boundary modifications that are being sought through this proposal. About three-quarters of the town/parish councils invited attended the event.

The event was highly interactive, with four key topics or themes that the Parish and Town Councils discussed:

1. Identity
   a. What do think drives a community's sense of place?
   b. What area, other than the parish, do you/your residents most strongly identify with?
   c. To what extent do you/your residents see themselves as part of Gloucester?
   d. What specifically informs the answers to (b) and (c)?
   e. Do you think you share a greater sense of place with neighbouring parishes?
2. Service Delivery
   a. Which council services are currently the ones that interest you and your residents the most?
   b. What services do you currently deliver and, thinking about the opportunities Local Government Reform may present, what services might you like to deliver in the future?
   c. What principles should underpin effective service delivery in a new unitary council structure and how can they be realised?
   d. If the Greater Gloucester model is not selected, what are your views on neighbourhood level service delivery within a larger unitary structure? Is there a place for a Gloucester Parish Council or Councils to deliver localised services on behalf of neighbouring parishes?
3. Community Engagement
   a. What do you think are the biggest challenges around Councils engaging with our communities today and how can we overcome them?
   b. What would meaningful community engagement look like in a unitary council model?

		c. How should we engage with you and your residents about Local Government Reform and the 'Greater Gloucester' unitary authority concept? d. Are there any specific local groups, stakeholders or organisations we should be directly targeting? e. How will we know if we have effectively engaged with residents?
4.	Governance	a. What opportunities and what concerns should be at the forefront of designing new governance structures? b. How do you envisage parish councils successfully influencing decisions in a new unitary council structure? c. Noting that parishes vary in size, do you have any preliminary thoughts about if/how your parish could be grouped with neighbouring areas when the ward boundaries and number of councillors for a unitary is decided? d. What involvement would you like in the further development of the Greater Gloucester option?

As can be expected, there was a wide spectrum of opinion expressed across these themes.

Some key messages were as follows:

- Many different factors influence people's sense of identity: natural features (e.g. River Severn, Cotswold escarpment), man-made features (e.g. roads), urban vs rural, where they shop or use leisure facilities, schools and GP surgeries, places of employment, even public transport routes.
- Senses of identity can change over time and with different population cohorts (e.g. youth).
- Many felt a strong identification with Gloucester, for the above reasons. Most of their residents shop in Gloucester and use facilities there. Some felt a stronger cultural identification with Forest of Dean, even though they were only 4 miles from Gloucester and 20 miles from Coleford. Similarly with Stroud. Some felt a shared sense of identity between Gloucester and Cheltenham.
- Planning and housing growth were key matters of importance for them and their residents. Being part of a Greater Gloucester area might allow them to have greater involvement in some planning decisions that affect them, but over which they currently have no control as they occur within the city boundaries.
- Parishes raised concerns about the impact from LGR on local plans and Neighbourhood Development Plans (NDPs). The potential dilution of parish influence in planning was a key concern, particularly where no NDP is in place.
- Harmonisation of council tax rates was also raised as a matter of importance. Other service priorities mentioned were:
    - Education
    - Waste and recycling
    - Roads and verges
    - Flood management
- There was some support for parishing for Gloucester, to be preceded by an engaging Community Governance Review. But also acknowledgement this might only make sense if Greater Gloucester was not the chosen option for reorganisation.
- LGR provides an opportunity to engender trust across areas of Gloucestershire which are demographically and geographically different, and also to improve communication and relationships between authorities.

- Possible role for parish councils in taking on some powers and functions, providing there is sufficient funding and resource. There is already a wide disparity in infrastructure, assets and service provision e.g. one parish council runs eight parks whilst others have no parks at all.
- Participants noted the importance of first engaging with their own communities to determine local service needs. This would enable parish councils to better assess what they can realistically deliver under a devolved model.
- Several councils requested:
    - A clear, accessible menu or list of potential services that parish councils might take on, from which they could select based on local capacity and interest.
    - An accessible walk-in office for the new authority, providing direct public access to raise service delivery concerns.
- Whichever LGR option is chosen, local knowledge is essential for both Members and Officers.
- Concerns about finding sufficient volunteers to stand as Councillors if Gloucester became parished.
- Concerns about Unitary Councillor-Elector ratios being too high (i.e. representing too many people) with new larger unitary councils – democratic deficit and loss of representation: the gap between Parishes and the next tier of government above will be too large and communications will be poor.
- Important that outlying rural areas don't miss out on investment, and this doesn't all go on urban areas.
- High levels of enthusiasm for ongoing substantive consultation and engagement throughout LGR process, though some still grappling with the implications of LGR and not yet ready to engage more fully.
- Support for the proposal to have a committee of parish councils for the Greater Gloucester unitary council.

This feedback has been used to shape several aspects of this proposal, and a programme of sensitive engagement will continue through the transition phase to new unitary councils.

10. Implementation Roadmap

We believe that establishing these two Unitary Councils for Gloucestershire – Greater Gloucester and Gloucestershire Councils - constitutes the best option for our residents, communities, businesses and partners.

Implementing the proposal in a straightforward way with carefully considered governance arrangements as well as the programme planning required to deliver a successful transition, will enable the strength of the proposal to be realised by communities with minimal disruption.

We recognise the new councils will need to take their own decisions about the pace and scale of change, the plans set out here provide a clear indication of our commitment to be safe and legal from day one, to accelerate implementation and secure the maximum benefits possible during the transition phase.

Safe and legal services from day one

Our most important priority for reorganisation is that the services from the new councils are “safe and legal” from day one. We will not allow the disaggregation of county council services to impact on anyone receiving these services and as we transition to the new councils, we will ensure that everyone currently receiving support from services continues to do so and will not fall through any gaps during this period of change. We say more on how we will do this below.

a. The Roadmap to Vesting Day

There are four key phases in the roadmap running through to vesting day in 2028. These phases are:

Phase 1: Business case and mobilisation
Phase 2: Preparation for implementation
Phase 3: Shadow authorities
Phase 4: Launch and transformation

The diagram below demonstrates the timings of key events and the overall road map through to vesting day.

Implementation Plan & Workstreams

Delivering a new model of local government for Gloucestershire will require careful planning, collaboration and leadership.

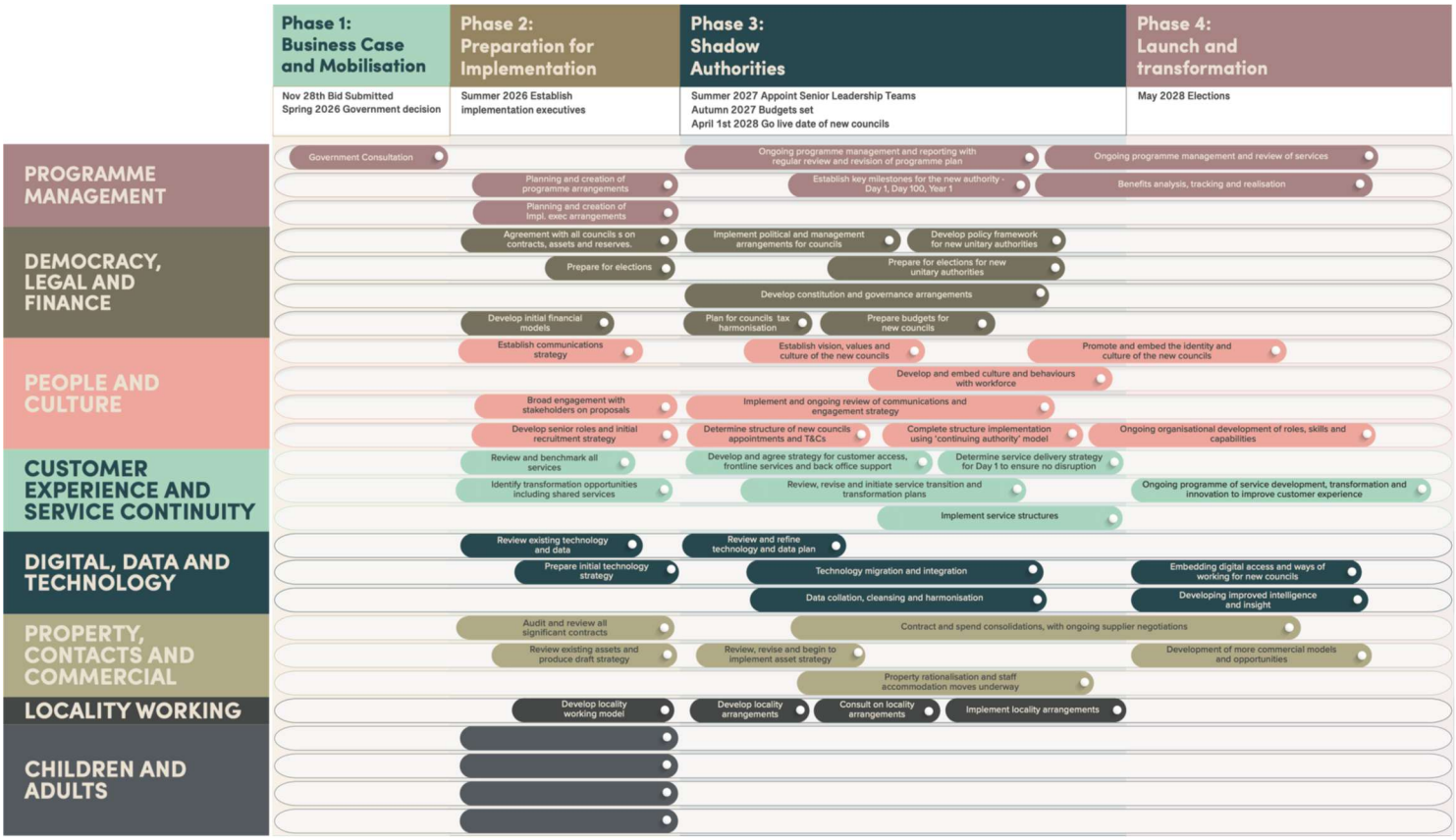
The implementation plan below sets out how the two new unitary councils would be established by Vesting Day in April 2028. Each phase is designed to ensure continuity, minimise disruption and deliver a smooth and successful transition to the new councils.

To oversee and drive the successful delivery of this change, we propose the creation of two dedicated Programme Management Office (PMO) and multi-disciplinary change teams (for each new authority), jointly supported by all current Gloucestershire councils.

A collaborative programme will ensure consistent oversight, transparent governance and the most efficient use of resources. Where possible, we will identify activity within current councils that can be paused or re-scoped, to free up capacity for implementation. It is recognised that additional capacity may be required at specific stages, depending on complexity and resource availability.

Key Features:

- PMO structure: A core team including a Programme Director, Programme Managers, Business Analysts, PMO specialists and Change Managers will coordinate delivery for a minimum of two years.



- Subject Matter Experts (SMEs): Seconded or recruited as needed to support planning and transition across specific workstreams - such as finance, HR, ICT, legal and service design.

- Flexible capacity: While the core programme will rely primarily on internal resources, future councils may choose to invest in additional specialist support to strengthen delivery.

- Workstream alignment: Cross-cutting workstreams will support implementation, initially led by current councils (Phases 1 and 2) and later transferring into and between the shadow authorities (Phase 3 onwards).

The following table shows the key workstreams for the programme:

Programme Management	Democracy, Legal and Finance
People and Culture	Children's and Adults

Customer Experience and Service Continuity	Digital, Data and Technology
Property, Contracts and Commercial	Locality Working

Phase 1: Business Case & Mobilisation

This phase will see the submission of this proposal to government by the end of November 2025.

Following submission, government is expected to consult on this and any alternative proposals over spring/summer 2026. During this period, we will continue to engage proactively with local residents, partners and stakeholders to build understanding and support.

At the same time, we will:

- Establish the Local Government Reorganisation Programme Management Office (PMO) and programme structure
- Begin technical information gathering (budgets, staffing, contracts, IT systems)
- Mobilise internal teams and prepare governance, communications and early engagement planning

We will engage with stakeholders on an ongoing basis in this phase, to raise awareness of the coming change and to build cooperation and consensus between key stakeholders across central and local government.

This phase lays the groundwork for effective delivery and early collaboration across all councils involved.

Phase 2 - Preparation for Implementation

Once government confirms the new structure for Gloucestershire - expected by Summer 2026 - this phase will begin the detailed preparation for delivering two new unitary councils.

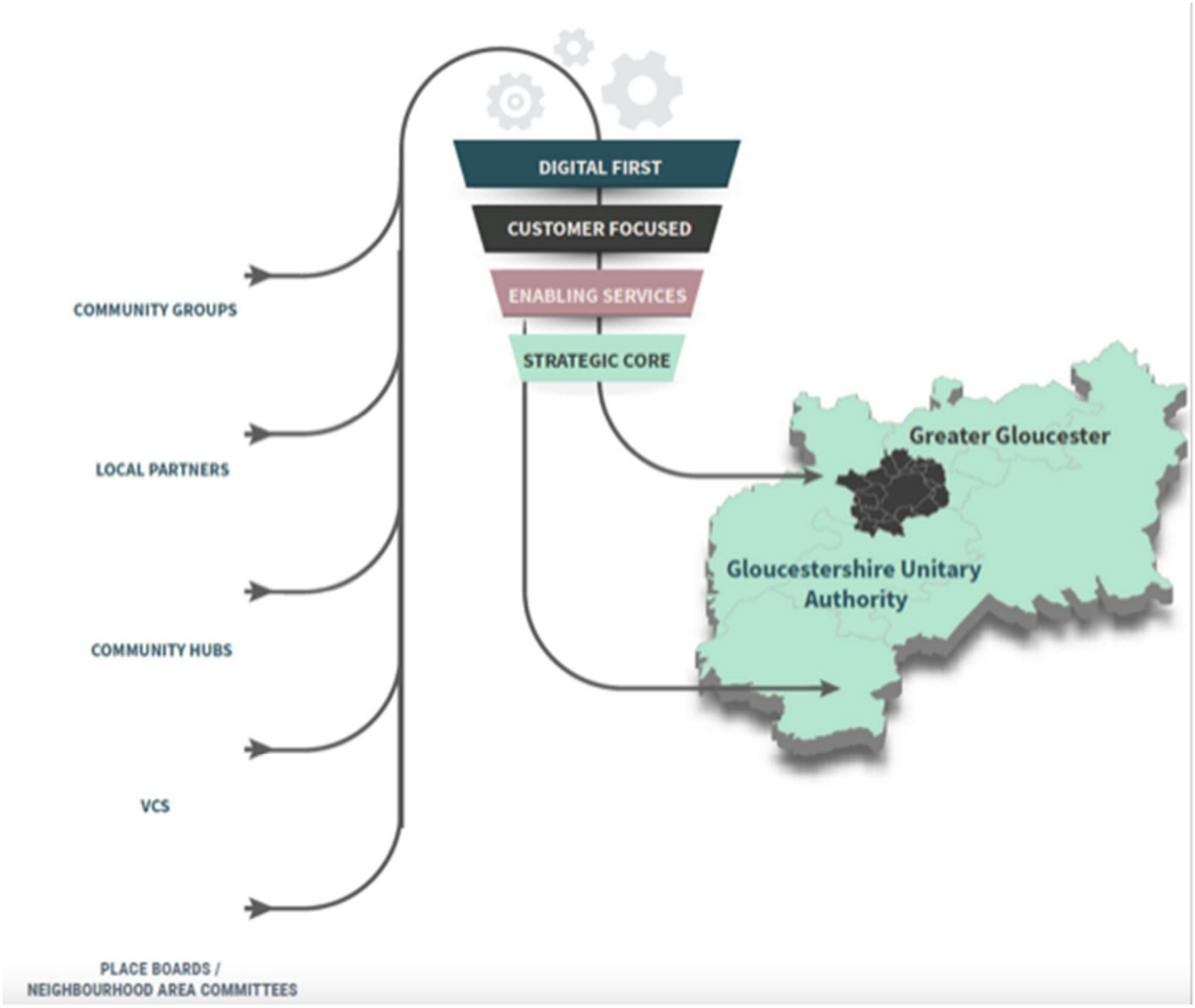
A new Gloucestershire Leaders' Implementation Oversight Group will be established to guide this work, ensuring political balance and representation from all seven existing councils. Cross-council coordination will be key during this stage, with a clear focus on delivery, readiness and continuity.

Work will begin on designing the new authorities and putting in place the governance, resources and infrastructure needed for a smooth and successful transition.

Key activities in this phase include:

- Establishing formal governance arrangements and programme management structures that will continue into the next phase and underpin the work of shadow authorities
- Developing a detailed implementation programme, mapping out delivery milestones and interdependencies

- Confirming future service requirements and target operating models, including both disaggregation of county services and aggregation of district-level functions
- Designing leadership, team structures and operating models, aligned to the proposed geography and identity of the new councils
- Planning for transition of key services, including those that need to be separated (e.g. social care, highways) and those brought together across current boundaries
- Aligning existing change activity across the current authorities to avoid duplication and ensure effort is focused on future delivery
- Reviewing baseline IT architecture, with early preparation for systems migration, including access to shared systems, email and building Wi-Fi for day one readiness
- Baselining property portfolios and initiating asset planning for the new councils
- Agreeing an external communications strategy, with clarity on engagement for residents, staff and partners
- Launching staff and trade union communications, including early workforce planning and shared HR principles
- Agreeing high-level HR transition plans, focused on continuity, fairness and retaining critical skills
- This phase will ensure all councils are aligned in their efforts, that momentum is maintained following government's decision and that the foundations are laid for a confident transition into the shadow authority period



Phase 3 - Shadow Authorities

The creation of shadow authorities will mark a key milestone in the journey to establishing two new unitary councils for Gloucestershire.

These shadow authorities will be formed around one year prior to Vesting Day in April 2028. Their purpose is to ensure continuity, clarity and confidence in the transition - both for those working within councils and for the residents and partners we serve.

Elections to the shadow councils will be held, supported by appointed officers. Together, they will oversee the complex planning and delivery required to launch the new authorities successfully.

During this phase, the shadow authorities will take responsibility for:

- Detailed integration planning and service transition, including the disaggregation of county services and aggregation of district and borough responsibilities, as well as integration of any existing shared or common services across current councils

- Organisation and operating model design, refining and finalising structures developed during Phase 2 to ensure the new councils are fit for purpose from day one

- Recruitment of senior leadership teams, including the appointment of Chief Executives, Statutory Officers and Directors to lead each of the new councils

- Staff transition and workforce planning, ensuring that the right people are in the right roles, while maintaining continuity of service and embedding the culture and values of the new organisations. TUPE processes will be carefully managed to support a skilled and motivated workforce

- Staff and trade union communications and engagement, including ongoing dialogue with employees throughout the transition to support morale, clarity and retention

- Budget setting for the new authorities, including development of consolidated financial plans and determining approaches to issues such as council tax harmonisation and business rates collection

- Look across all back-office support functions to ensure smooth continuation of employment arrangements, pensions and pay

- Data management and IT transition, including the safe migration of systems and records to ensure operational readiness and a Minimum Viable Product (MVP) for each new Council from day one

- Stakeholder engagement, reinforcing current partnerships and establishing new ones where needed to support strategic delivery and local impact. This includes engagement with NHS partners, police and emergency services, business groups and the voluntary sector

This phase is crucial for operational confidence, democratic continuity and service assurance. It is where the plans made earlier in the programme begin to take practical shape - setting the stage for the formal launch of the new councils and their future success.

Phase 4 - Launch of the New Councils

At the point that new authorities formally come into existence on vesting day in April 2028, greater focus can be placed on the long-term strategy for the future authorities.

In April 2028, the new unitary authorities will formally come into existence. Vesting Day will mark the point at which the two new councils assume full responsibility for delivering all local government services in their areas. Optimisation of aggregated services - particularly where integration creates the opportunity to enhance consistency and efficiency.

From this point forward, the focus will shift from transition to transformation. Each new council will shape and deliver its own long-term vision - built around local priorities, empowered communities and better outcomes for residents.

To do this, each unitary authority will establish a dedicated transformation programme, responsible for delivering the agreed target operating model and embedding new ways of working.

Key areas of focus are likely to include:

- **Resident contact** - delivering modern, responsive and accessible services through digital channels, local hubs and joined-up customer experience models
- **Service transformation** - reshaping service delivery models to be more efficient, effective and tailored to local needs
- **Back office and enabling services** - streamlined to deliver better value and smarter support for frontline delivery
- **IT and data strategies** - supporting secure integration, improved automation and evidence-based decision-making
- **People, organisational development and culture** - fostering a strong public service ethos and shared organisational identity, focused on delivering for residents
- **Estates and assets** - reviewed and optimised to ensure buildings and infrastructure reflect the new councils' structures, workforce and accessibility goals
- **Optimisation of aggregated services** - particularly where integration creates the opportunity to enhance consistency and efficiency
- **Enterprise Resource Planning (ERP) and Customer Relationship Management (CRM) systems** - including implementation of new platforms or the further consolidation of existing systems to ensure seamless operations
- **Detailed review of existing contracts and third-party spend** - with a focus on consolidation, rationalisation and achieving best value through economies of scale
- **Consolidation and alignment of fees and charges** - reviewed to ensure a fair, transparent and sustainable approach across the new councils
- **Review and harmonisation of pay, terms and conditions** - ensuring fairness, equity and support for staff retention
- **Ongoing change management and communications** - delivered as a dedicated workstream, with continued engagement of staff, partners and residents throughout the transformation process

This phase is when vision becomes reality: two strong, forward-looking councils are now functioning that are simpler, more strategic and better connected to the people and places they serve.

Implementation Costs

Delivering change at this scale requires investment - not only in systems and infrastructure, but also in people, partnerships and preparation.

Our proposed implementation model is deliberately pragmatic and collaborative. It assumes that most of the delivery work will be led by councils themselves.

We will build a multi-disciplinary change team that includes representatives from all councils and is empowered to drive delivery efficiently and effectively. This collaborative approach keeps costs proportionate, reduces duplication and ensures that expertise from across the system is embedded from the outset.

Category	(£m)
Redundancy Costs (A)	6.813
Rebranding / Comms	0.500
Public consultation	0.400
Transition support / remodelling costs	5.000
Programme Management	2.000
Legal costs (contract novation, new constitutions)	1.250
ICT costs	4.000
Contingency	4.000
Shadow operations	1.000
Additional agency year 1	0.750
HR Support for transition / TUPE etc	1.200
Sub-Total Non-Redundancy Costs (B)	20.100
Total One-off Costs (A+B)	26.913

Our modelling includes all potential costs associated with the transition to two new unitary councils - from systems and branding to staff time and technical delivery. This includes:

- Creating and launching the two new councils
- Closing down legacy council structures
- Establishing branding and communications infrastructure
- IT systems migration and licensing
- Programme governance and delivery

- HR and legal transition processes

Estimates are based on a prudent approach. We have modelled both baseline and stretch scenarios and a 20% contingency has been included (excluding redundancy and early retirement). Staffing-related costs are benchmarked against current average redundancy costs in Gloucestershire County Council and are directly linked to workforce savings in the model.

This investment will enable a strong and stable transition, while unlocking long-term savings and better services for every community in Gloucestershire.

b. Managing Delivery

The disaggregation of county-level services - and the consolidation of district and borough functions - is one of the most complex and critical aspects of local government reform.

Our approach is rooted in service quality, resident outcomes and local delivery. We will work closely with service teams to ensure that change is owned by those best placed to lead it - supported by robust governance and clear communication at every stage.

Within this, there is some important nuance - especially when it comes to highly specialist services. For example, Emergency Duty services and Approved Mental Health Professionals in Adult Social Care may require transitional or alternative delivery arrangements to ensure safe, legal and effective service on Day One.

Similarly, the disaggregation of the county's contact centres for social care and learners will require careful planning and coordination.

These teams are often the first point of contact for Gloucestershire's most vulnerable residents and play a critical safeguarding role. Until sufficient capacity is built up in both new authorities, there is a risk of uneven demand distribution, which could lead to service backlogs or safeguarding concerns if not proactively mitigated.

Three enablers of success will underpin this work:

1. Service-led transition: Teams with day-to-day knowledge will lead the design, planning and change implementation, supported by the wider LGR Programme Team, ensuring continuity and clarity. This ensures the right skills and capabilities are in place while recognising that those with the most knowledge and experience are best placed to shape the future operating model

2. Strong governance and oversight: Cross-council boards will provide assurance, challenge and strategic direction, supported by expert advice

3. Resident and stakeholder engagement: Our communications will be transparent and proactive, helping residents, partners and frontline teams understand what's changing and why

Key transition activities will include:

- Reviewing the current locality structures and workforce to identify appropriate allocation to future authorities
- Agreeing future organisational design and delivery structures with shadow authorities and delivery partners
- Refining service operating models to reflect new geographies and population needs
- Reviewing policies, systems and processes to ensure consistency and compliance
- Restructuring governance, board memberships and local representation frameworks
- Developing detailed service transition plans to ensure service continuity and quality

Social Care and Safeguarding

Some services - such as social care, highways and waste - will require special attention due to their complexity and infrastructure requirements.

We recognise the significant potential risks associated with disaggregating Children's and Adults' social care. Transitions will be carefully phased and informed by risk assessments and workforce planning; we remain open to exploring models that mitigate any negative impacts.

While shared service models have been trialled elsewhere, evidence suggests they often increase complexity and reduce accountability. We do not believe this is the right solution for Gloucestershire.

However, for certain highly specialised functions - such as Emergency Duty and Approved Mental Health Professional services - transitional arrangements or federated delivery models may be considered to ensure safety, legality and continuity on Day One.

Single point of access contact centres for vulnerable residents will also need careful management to avoid service backlogs or safeguarding risks. Additional capacity may need to be built into early plans to ensure safe and timely delivery.

To ensure clarity and confidence in delivery, we have set out a high-level implementation plan for Adult Social Care, highlighting the key actions, leadership responsibilities and governance arrangements required through transition.

Implementation Plan for Adult Social Care:

ACTION	LEAD OFFICER	COMPLETION DATE	GOVERNANCE ARRANGEMENTS
Recruit Senior Leadership Team (including Director of Public Health) Establish a vision and priority	Chief Executive and Recruitment Agency - Members Appointment Panel.	Three months from date of approval of new arrangements.	Cabinet and Corporate Management Team.

objectives			
Appoint Lead Member Adults and Health.	Political Appointment - Leader of the Council. Monitoring Officer.	Within first week of creation of the shadow authority	Cabinet
Establish Key Partnership Boards. Adults Safeguarding Board / Health & Wellbeing Board / Joint Commissioning Board.	DASS and Senior Leadership Team of Adults Social Care.	First Three months of shadow authority	Adults and Health Leadership team / CMT / Cabinet.
Transition to Single Point of Access (SPA). Confirm arrangements for s42 / Hospital Discharge / ASC client workflow.	Adult Social Care Leadership Team	Effective first month	Adult Social Care DMT and CMT.
Understand provider / commissioning arrangements. Make decisions on contract provision continuity from go live date.	Adult Social Care Senior Leadership Team	On-going	ASC Leadership and Cabinet.
Understand the early support and prevention and amend where necessary against need	DPH and Adult Social Care Senior Leadership Team	On going from shadow authority arrangements	ASC DMT / CMT / HWB & Cabinet.
Establish updated QA and performance data for the new directorate.	Adult Social Care Senior Leadership Team	Within first three months of shadow authority go live date.	Adult Social Care DMT / CMT / Adults and health Scrutiny / Cabinet
Establish links with key partners - Carers Forum / Care Providers (home care & residential care). VCS Network.	Adult Social Care Leadership Team	Within first month of shadow authority go live date.	Adult Social Care DMT / Health Committee & Cabinet
Develop the ASC model - Family Network / Community support services / supported living and extra care housing / use of technology & adaptations.	Adult Social Care Leadership team.	Within first six months of shadow authority go live date.	
Undertake financial assessment of cost of care and benchmark with statistical	Adult Social Care Senior Leadership team and LGA.	Within first six months of shadow authority arrangements	Adult Social Care DMT / CMT / Adults & Health Committee / Cabinet.

neighbours and national			
Profile of Workforce	Adult Social Care Senior Leadership team / PSW & HR Lead.	Within first three months of shadow authority go live date.	Adult Social Care DMT / CMT / Health & Social Care Committee.
Prepare for CQC Inspection and create a Self-Assessment	Adult Social Care Senior Leadership Team & HoS	Within first six months of shadow authority go live date.	Adult Social Care DMT / CMT / Adults & Health Committee and Cabinet.

Implementation Plan for Children's Services:

A similar approach will be taken for Children's Services, where safe transition and continuity of care are paramount. A high-level implementation plan for these services will follow, capturing the actions, leadership roles and governance required to deliver a smooth transfer.

ACTION	LEAD OFFICER	COMPLETION DATE	GOVERNANCE ARRANGEMENTS
Recruit Senior Leadership Team	Chief Executive / Lead Member and Leader of the Council	First three months of creation of shadow authority	CMT / Cabinet
Appoint Lead Member for Children's Services	Leader of the Council / Cabinet	First three months of creation of shadow authority	Chief Executive / Cabinet
Establish Arrangements for MASH (Multi-agency safeguarding Hub / Front Door)	Children's Services DMT & Safeguarding Children's Partnership	First three months of creation of shadow authority	CS DMT / CMT / Children's Committee / Safeguarding Children's Partnership (SCP)
Create new partnership Boards - SCP / Youth Justice / SEND / Schools Forum / Secondary and Primary Heads meetings.	Children's Services DMT / Lead Member for CS	First Three months of shadow arrangements	CS DMT / CMT / CS Committee / Cabinet
Review the profile of the workforce and understand agency rates - develop a social worker recruitment campaign for new authority.	Children's Services DMT / CMT	First three months of shadow authority being established.	CS DMT / CMT / CS Committee.
Review Budgets - Revenue and HNB of the DSG. Commit to existing savings plans.	CS DMT / Schools Forum	First three months of shadow authority being created.	CS DMT / DMT / CS Committee.
Review the	CS DMT	Within first three	CS DMT / CMT /

arrangements for in-house provision (children's homes)		months of shadow authority being established.	Children's Services DMT.
Develop updated CLA and SEND sufficiency strategies.	CS DMT	Within first three months of creation of shadow authority.	CS DMT / CMT / Schools Forum / Children's Services Committee.
Review practice methodologies across the LA's and commit to integration of one with an accompanying training and workforce plan.	Principal Social Worker / CS DMT	Within first three months of creation of new authority	CS DMT / CMT / Children's Services Committee
Review the IT systems and if appropriate plan to integrate into one system.	CS DMT / Resources IT Lead.	First three months of creation of new shadow authority. (Could be a long term change programme.)	CS DMT / CMT / Children's Services Committee / Cabinet.
Develop performance management and quality assurance arrangements including case audit.	Principal Social Worker / Corporate performance Lead / CS DMT	First three months of creation of shadow authority	CS DMT / Children's Services Committee / Cabinet.
Develop a self-assessment for service and prepare for ILACS / SEND Area Inspection / Include also the OFSTED Annual Conversation.	Children's Services DMT	Within first six months of creation of shadow authority being created.	CS DMT / CMT / Children's Services Committee / Cabinet / ICB for SEND Area Self-Assessment.

Cultural and Heritage Services

Gloucestershire's history, culture and heritage is a vital part of our identity and community infrastructure. Several cultural services - such as libraries and heritage sites - currently operate on a county-wide footprint or receive shared funding. These services will require bespoke planning and may benefit from lead authority models or continued partnership structures - ensuring that our cultural assets continue to inspire pride, learning and connection across all our communities.

These services rely heavily on infrastructure that is not evenly distributed across the county. For example, we propose that Gloucestershire Archives remains as a single countywide service, regardless of how many unitaries are created. Similarly, countywide registration service (registrars), coroners, and support for the Lord Lieutenancy would also remain countywide. Similarly, waste services depend on assets like community recycling centres, some of which may need to be shared temporarily post-vesting.

For the early implementation period, we will explore fair and transparent models - such as service agreements or 'pay to use' arrangements - to avoid disruption while longer-term options are developed.

The goal is simple: services must remain safe, effective and locally responsive, throughout the transition and into the future.

Managing Risks & Interdependencies

Change on this scale comes with risks, but also with clear rewards.

We will adopt a formal risk management approach, based on best practice from across local government and aligned to existing frameworks within Gloucestershire councils.

Our risk strategy will:

- Identify and assess risk at corporate, programme and service level
- Put in place clear mitigation strategies and ownership
- Regularly review and report risk through governance structures
- Capture and respond to cross-cutting risks that could impact multiple services or authorities
- Use risk insight to shape delivery timelines and investment decisions

Workstream	Risk Theme	Description	Impact	Likelihood	Mitigation / Control Measures	Accountable Owner
1. Programme Governance & Delivery	Programme coordination and delivery capacity	Weak governance or unclear accountability could cause timetable slippage and reduce confidence in programme delivery	High	Medium	Establish Programme Board and PMO with clear roles; detailed milestone plan; independent gateway reviews; escalation process for issues and decisions	Programme Director
2. Finance & Benefits Realisation	Financial pressure and delayed savings	Transition or redundancy costs may exceed forecasts, delaying savings and affecting early budgets	High	Medium	Build contingency into financial model; conduct regular budget and benefits reviews; independent audit assurance; benefits realisation framework integrated into reporting	Section 151 Officer / PMO Lead
3. People & Workforce	Workforce stability and retention	Uncertainty may lead to staff loss, capability gaps or institutional knowledge loss, weakening service delivery	High	Medium	Early and transparent communication; retention incentives; career pathways in new unitaries; joint HR and trade union engagement forum; clear TUPE plan	HR Director

4. Systems, Digital & Data	ICT integration and data migration	System failure or data loss during integration could disrupt services and breach compliance	High	Medium	Develop a comprehensive digital transition plan; dual running of critical systems; robust data governance and testing; external assurance on migration readiness	Chief Information Officer
5. Service Continuity & Design	Service disruption during transition	Disaggregation or redesign of People and Place services (e.g., social care, housing, waste) may cause disruption to critical care or local services during transition	High	Medium	Create service continuity teams; map statutory services; phased implementation; maintain interim shared services; align with regulatory expectations (e.g., Ofsted, CQC)	Service Transition Leads (People & Place)
6. Legal & Governance	Statutory approvals and governance design	Delay or amendment to legal orders may disrupt timetable or create uncertainty	Medium	Low	Early engagement with government departments and legal counsel; scenario planning for order timing; interim governance arrangements agreed between partners	Monitoring Officer / Legal Lead
7. Communications & Engagement	Clarity and stakeholder confidence	Unclear or inconsistent communication could confuse residents, partners, and staff	Medium	Medium	Develop comprehensive communications plan; branded GLFA transition portal; staff FAQs; regular updates to elected members and stakeholders	Communications Lead
8. Partnerships & Devolution Alignment	Alignment with MCCA and key partners	Lack of coordination with the Mayoral Authority, NHS, PCC or VCSE sector could create duplication or weaken outcomes	Medium	Medium	Establish joint planning forums; shared leadership representation; quarterly alignment reviews; active collaboration in devolution planning	Partnership Lead

This robust risk strategy will help maintain momentum, avoid duplication and deliver the new councils with confidence and clarity.

11. Conclusion

Our plan for Local Government Reorganisation in Gloucestershire represents both a practical and a visionary step forward. By moving from the current two-tier and mixed unitary structure to two new unitary councils - Greater Gloucester and Gloucestershire - we will simplify local government, strengthen accountability and create a system fit for the future.

The new councils will deliver financial sustainability by reducing duplication, achieving efficiencies and reinvesting savings into frontline services. This is essential to address current budget pressures and to ensure long-term resilience. At the same time, the new structure will provide stronger leadership, clear, local accountability and services designed around the lives of our residents.

Change must be managed carefully. A phased transition, guided by strong governance and robust engagement with staff, partners and communities, will ensure continuity of services and a safe handover into the new arrangements.

This reorganisation is also about unlocking potential. With empowered councils working alongside the Strategic Mayoral Authority, Gloucestershire will be positioned to secure new investment, attract good jobs and lead in areas such as green technology, food security and healthy ageing.

Our ambition is clear: to create a fairer, greener and more prosperous Gloucestershire for all - rooted in our proud identity as a “place of places,” and driven by the needs and hopes of the people who live and work here.

Appendices

Appendix A | Submission (unmodified): Gloucester City/Gloucestershire County Proposal

Introduction

In response to the invitation made by the Secretary of State for Housing, Communities and Local Government, on the 5 February 2025, Gloucester City Council (GCC) is submitting the following proposal under the Local Government and Public Involvement in Health Act 2007.

GCC believes that the solution that will deliver a long term sustainable solution for Local Government in Gloucestershire, delivering better outcomes for residents and business and best value for money for the tax-payer, is built on the heritage of an urban, growth focused Gloucester City and largely rural Gloucestershire County area.

The model we have developed will enable all parts of Gloucestershire to achieve their potential.

The Gloucester City authority will foster economic growth. It will be able to focus on the issues that matter to its unique population: higher social needs, homelessness and improving children's services, along with protecting its heritage.

The Gloucestershire County authority will represent its very different demographic and need: sustaining scale, stability and rural heritage, whilst also focusing on the challenges of an ageing rural and market-town populations. This council will have capacity to manage growth in market towns, secure rural transport and sustain prevention in adult care.

Our vision is that these two authorities, with unique focus and identities that will serve their communities, will build on the effective partnership working that has taken place across Gloucestershire over the past 15 years. Our model offers the opportunity to strengthen those partnerships, developing a system of local government for the area that optimises value for money and delivers the best outcomes for residents and businesses.

Our proposal provides the basis for: -

1. **Improving outcomes for residents:** by addressing imbalance in demand for services - through early intervention, local place-based delivery and simpler access to services

2. **Reforming failing services:** enabling each authority to focus on the needs of their population, across the diversity and younger population of Gloucester City, and the older and rurality of Gloucestershire County.

3. **Unlocking growth:** giving Gloucester the tools of a unitary council to match the performance of peer cities while Gloucestershire focuses on delivering prosperity across towns, villages, and the rural

economy

4. **Creating financial sustainability**: simplifying governance, reducing duplication will unlock operational savings; while prevention-first delivery will improve outcomes in children's and adults' services bringing long-term savings.

5. **Preserving historic identity:** strengthening Gloucester's heritage as an historic cathedral city, and Gloucestershire protecting the internationally recognised heritage of the Cotswolds, Forest of Dean, and wider county.

A vision for change -

Our submission is built from our fundamental belief and understanding that:

1. Gloucestershire is not a single area and has vastly different opportunities and challenges between the only city – Gloucester - and the largely rural rest of the county. These differences will not be best served through a single and remote Council.

2. Growth across Gloucestershire will come through a thriving City of Gloucester which is the economic driving force for Gloucestershire. Unitary status for Gloucester will unlock its significant potential.

3. Building on the multiple unique characteristics of Gloucestershire will create growth and the best future for residents. The characteristics and heritage are diverse – an historic cathedral city, the Cotswolds and the Forest of Dean. This diversity is best served with the focus that two Unitary Councils will bring: one for Gloucester and one for the rest of Gloucestershire.

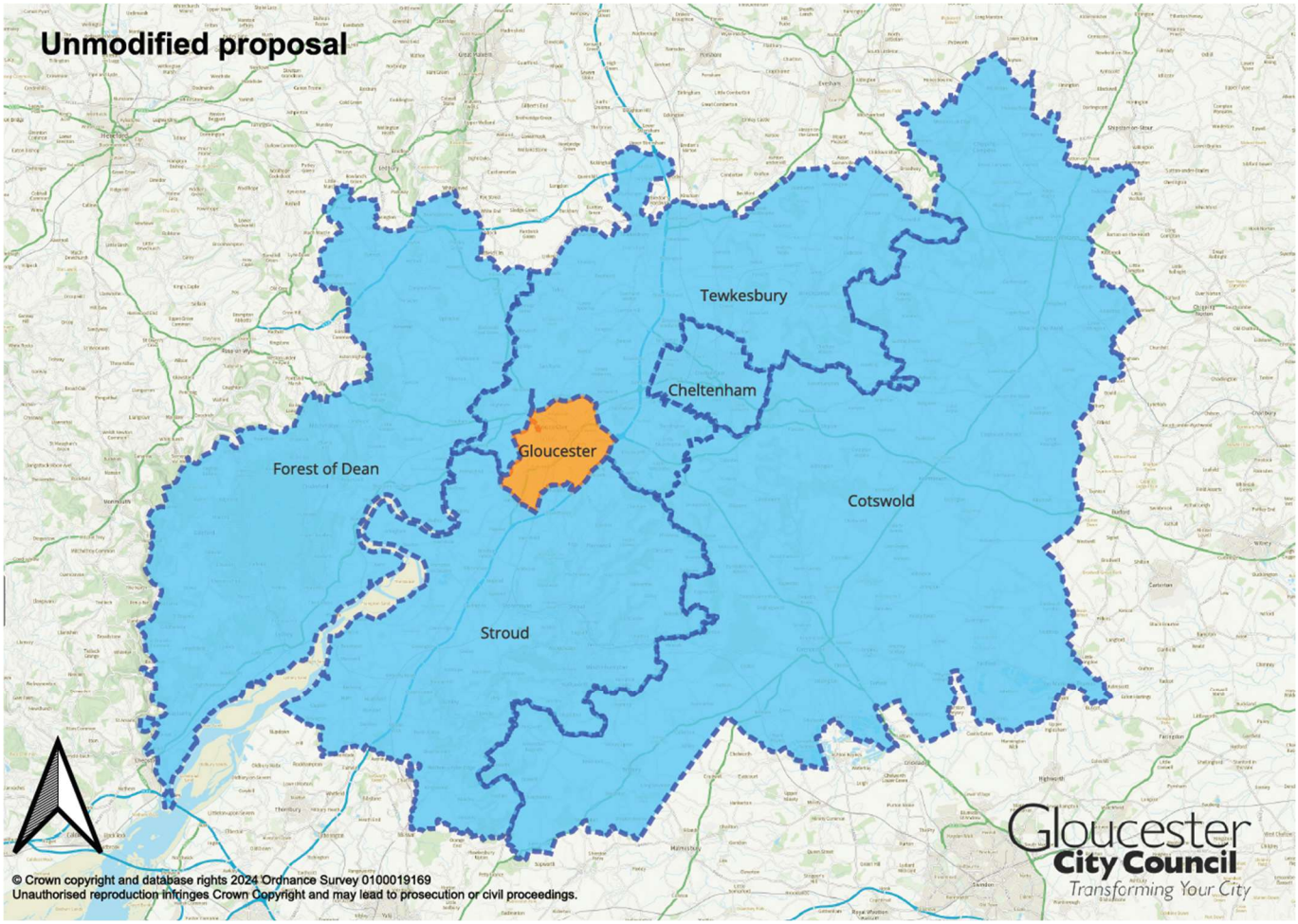
4. Outcomes for residents need to be improved to tackle failing services. This reform is most effectively delivered at a local level, with services tailored to neighbourhood need and focused on partnership, early intervention and prevention.

5. Devolution is best supported by multiple strong unitary Councils aligned to distinct local economic geographies. A single county unitary council won't match the size of existing neighbouring unitary councils leading to unbalanced democracy in the region.

Proposal

We formally submit the following 'Type B' submission (as set out in the Local Government and Public Involvement in Health Act 2007) for two new Gloucestershire Unitary Councils.

Figure 1. Unmodified Unitary Map – using district boundaries as the building blocks



As set out in the diagram above, our proposal, based on unmodified local government district boundaries, is for two new unitary Councils designed around distinct social, economic and place geographies covering:

New Unitary	Comprised of (full Districts)	Population (2021)	Population Projection (2040)
Gloucester City	• Gloucester City Council	• 132,500	• 143,300
Gloucestershire Unitary Council	• Stroud District Council • Cotswolds District Council • Tewkesbury District Council • Forest of Dean District Council • Cheltenham Borough Council	• 121,104 • 91,500 • 98,900 • 89,100 • 120,300	• 143,500 • 106,300 • 120,000 • 97,000 • 128,100

Policy Alignment

We believe our approach represents a strong fit against all criteria set out in the invitation for LGR submissions:

Criteria 1: Establishing of a single tier of local government for the whole area concerned	✓

The two-unitary model creates a single tier of local government across Gloucestershire. The proposed structure of local government is based on geographies that align with economic areas and embraces the opportunity to stimulate both urban and rural growth in the County.

There are huge areas of economic and housing growth potential in the Gloucestershire Unitary including a step change in housing delivery to achieve the 3000 homes per year that the County needs and embracing area-specific opportunities such as the Golden Valley in Cheltenham and the Ashchurch garden town.

Gloucester City requires its own solution: as one of the key cities in the South West Region, it has the potential to achieve significant housing growth, with the goal of increasing housing delivery by over 50%, while unlocking the economic potential of the City.

The proposed model provides both new authorities with the tools and focus required to deliver sustained growth and improve opportunities for residents across the entire region.

Criteria 2: Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shock	✓

Both authorities are within the population range of existing unitary authorities in England, the Gloucestershire unitary council with a population of 512,600 would be within the top 15 largest unitary authorities in England (based on current configuration). Gloucester City Council with a population of 132,500 is larger or similar to a number of unitary councils including Hartlepool, Darlington, Herefordshire and Halton.

Although the Council Tax base is imbalanced between the two authorities there are a number of unitary authorities with similar Council Tax bases to Gloucester City Council, which have demonstrated sustainability and resilience to financial shocks. The Gloucestershire Unitary Council Tax base is extremely robust and provides the authority with the resilience to withstand unforeseen events.

Criteria 3: Prioritising the delivery of high quality and sustainable public services to citizens	✓

The design and delivery of public services around specific local needs and demands is central to the two-unitary proposal and will build on the existing culture in Gloucestershire of strong partnership working to optimise both the quality and value for money of the services delivered. The model embraces the existing service delivery company Ubico, jointly owned by the Councils, as a model for delivering best value for residents and in this model we would seek to deliver more services through this route wherever sensible to do so.

The proposed model includes two distinct authorities, who will be accountable for delivering key services such as Adult Social Care and Children's Services and housing. Existing data demonstrates that the demand in different parts of the county vary greatly, with the Gloucester City Council area having a demand for children's services that is significantly greater than its population. Whereas the Gloucestershire Unitary area consists of a much older population, with 25% higher proportion of the population being over 65.

Our model will enable both new unitary authorities to focus on the interventions that the people and places they serve require.

In the proposed model the vision is that both authorities will unlock the potential of their local places and build a strong partnership based culture, working closely with public and voluntary sector partners and embedding a prevention based approach.

Criteria 4: Showing how Councils have worked together, considered local views and embraces heritage	✓

The proposed model embraces the diverse heritage of Gloucestershire, building on the heritage of the historic City of Gloucester and the rurality and key towns of the Gloucestershire Unitary.

Councils in Gloucestershire have a strong history of working collaboratively for the benefit of their residents, delivering value for money services through shared assets and delivery vehicles – our model enhances that.

The model is informed by feedback that was collectively commissioned by all seven councils and the development of the Gloucester City and Gloucestershire Unitary unlocks new opportunities to engage with residents, businesses, partners and other stakeholders to ensure both Councils deliver for the people they serve and play a central role in enabling other public services to deliver most effectively within the area.

Criteria 5: Supporting devolution arrangements	✓
The development of the Gloucester City and Gloucestershire Unitary will support devolution in the area by creating two strong voices at the devolution table for Gloucestershire, giving the county more proportionate voting rights in the governance of the Combined Authority than a single unitary would. A strong City voice, to sit alongside the voices of other key cities such as Bristol and Bath in the WECA sub-region, or Hereford and Worcester, or Oxford and Swindon, and to drive growth more equitably across the sub-region, standing alongside a Gloucestershire County voice to balance the rural areas of the Mayoral Authority. Our initial preference is that the two authorities will join the West of England Combined Authority, however we are also exploring other options with existing or potential new Strategic Mayoral Authorities.	

Criteria 6: Stronger community engagement and empowerment	✓
The two unitary approach ensures that local democracy is accessible to all and retains strong democratic accountability in decision making. The model is founded on an enhanced approach to neighbourhood working and place-based governance which will embrace the roles of Parish and Town Councils. Alongside formal neighbourhood governance there is a vision to develop a number of informal mechanisms that will enable communities to engage at the most local level to ensure that the Councils are able to understand, engage with and respond to the people they are there to serve. The model for the Gloucester City and Gloucestershire Unitary Councils will make local democracy simpler, easier to understand and more accessible to residents.	

Request for modification –

The preceding proposals are submitted following the invitation and the terms of section 2 of the Act. They follow a considerable amount of work completed within our partnership and with our partners.

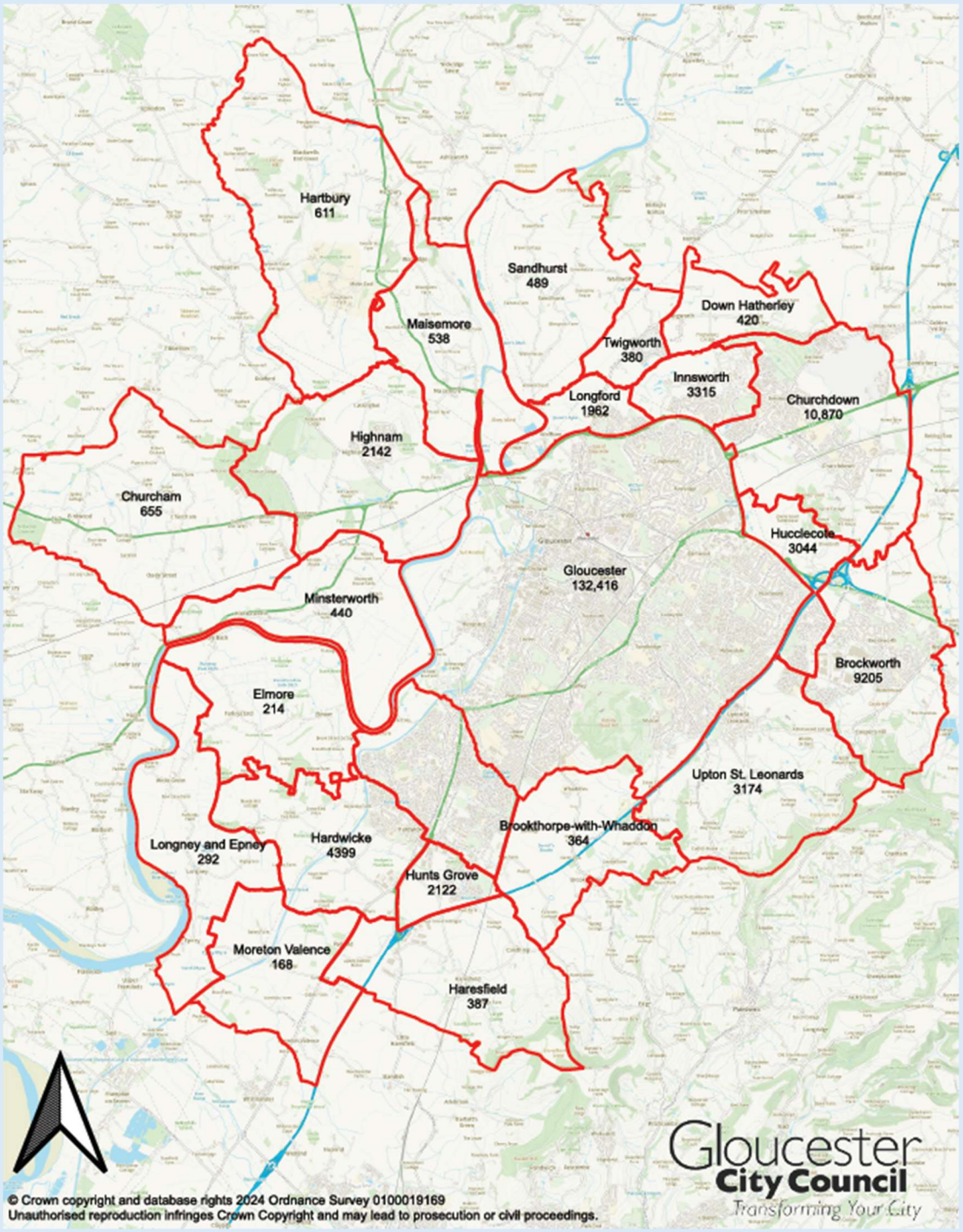
Pursuant to the Act, in particular section 7, the Secretary of State can, by order, implement proposals with modifications. Following our extensive workings, local knowledge, and analysis we are requesting that modifications are made to our proposals in order to substantially improve the overall benefits to be gained by reorganisation.

This approach follows the indications set out in the Interim Plan submissions for Gloucestershire and is considered to be essential to achieve best outcome for residents, communities and businesses through substantial enhancement of the benefit case. The modified proposal delivers a local government structure fit for the next fifty years.

The specific modification we are seeking is that –

- The boundaries of the Gloucester unitary set out above are extended to encompass the true economic geography of Greater Gloucester, by including the Civil Parishes of: Churcham, Highnam, Maisemore, Hartpury, Sandhurst, Longford, Twigworth, Down Hatherley, Innsworth, Churchdown, Hucclecote, Brockworth, Upton St Leonards, Brookthorpe and Whaddon, Haresfield, Hunts Grove, Moreton Valance, Hardwicke, Longney and Epney, Elmore and Minsterworth
- The boundaries of the Gloucestershire unitary set out above are reduced through the removal of these same civil parishes.

Figure 2. Modified Unitary Map -



We request this on the basis that –

- This would allow a substantial enhancement to the proposal set out above, and in particular our ability to better meet the LGR criteria, as set out in our modified submission (attached) and enable the creation of a new Greater Gloucester authority to form the model for local government alongside the Gloucestershire Unitary Council.
- There is a very strong public service justification, on the basis that our core service models are rooted in the establishment of new prevention and neighbourhood focused services, aligned around the demographic differences found across the county, which are not considered to be achievable via other means. This modification provides the scale for Greater Gloucester and also better reflects the way people in Gloucestershire live their lives, and the people and places they engage with.
- Whilst we model a significant reorganisation one-off cost, estimated at around £26.913m, these are proximate to estimates for other forms of reorganisation and still self-financing within 4 years of vesting day.

These boundary changes are –

- The most effective way to develop a new unitary that accurately reflects the true geography of Gloucester, creating a new Greater Gloucester unitary which addresses historic under-bounding and has the scale and potential to achieve the growth the city, county and country needs.
- The optimal way of mitigating any unintended consequences of boundary change with Cheltenham Borough Council, Cotswold District Council and Gloucester City Council contained entirely within one unitary and small changes to the boundaries of Forest of Dean Council and Stroud District Council, with only the boundary of Tewkesbury District Council changing substantially

Discounted options

We do not believe it practical to achieve the same via other means – particularly a future Principal Area Boundary Review (PABR). The significant downside of a PABR approach would be the substantially increased transition and service disruption time, alongside the significantly – and unnecessary – increased costs to implement. In effect, as the size and shape of authorities are materially different a PABR would mean:

- Requiring, effectively, two rounds of reorganization, impacting on both authorities.
- Transition period significantly extended, with substantial additional disruption for staff and service users.
- Transition costs growing by a further 20-30% driven, in particular, by duplication of transformation elements and additional ICT costs accrued.
- Payback being delayed substantially due to additional costs and benefits being deferred.

On this basis we believe immediate modification is the only practical route forward.

We request this be taken into account, and our modified submission, as attached, be the version presented for consultation.

Appendix B | Inner Circle Report: A Case for Cities

[circulated as separate file attachment]

Appendix C | Economic Impact Calculations

Purpose

Appendix C sets out in a step by step process the calculation of the economic impact (benefits and disbenefits) of each of the three options considered within the option appraisal.

Process

The initial steps were:

- Identifying the appropriate measures
- Identifying the baseline for each measure (from national statistics or local reports)
- Identifying the value of each unit of the measure (from research)
- Agreeing the relative impact each option may have in movement from that baseline (based upon local knowledge and previous examples / pilot studies)

The calculation steps then follow:

- Multiplying the forecast change by the respective value (to get the Gross Impact)
- Applying an 'Additionality Adjustment' - a series of factors adjusting for what might have happened anyway without the change (see below for a detailed description)
- Discounting future (dis)benefits to reflect a benefit now, all things being equal is more desirable than the same benefit in the future

This approach then gets to a calculated net present value per option for the impact per measure and overall impact.

Appropriate measures

As detailed in the main report, a series of potential outcomes were presented, which were eliminated down to those where the option selected was likely to have a material impact on that outcome achieved. Then to avoid duplication, a single measure was chosen to measure the impact of that change per outcome. Table A.1 sets out the selections.

Table A.1: Measures used for calculating economic impact

Outcome	Output measure	Reason for inclusion
Job creation	Gross Value Added for jobs created	A combination of impact of public sector losses in region from re-organisation + impact of an enhanced economic strategy tailored to urban needs in options focussed on such
Small business survival	Gross Value Added for increased start-up / SME survival rates	Greater align economic development with local strengths and needs - where tighter focus on specific regions
Investment within area / region	Investment within area	Gloucester City has a strong track record of working to engage partners in regeneration within its boundaries - there is a risk that this is diluted without a specific council carrying out these duties

Cultural engagement	Change in people engaging in cultural activities	The closer the link between each council and its residents will allow for more engagement and celebration of cultural identities - conversely the more distant, the more likely for there to be disengagement from current activity levels
Crime & disorder	Change in recorded crime	Exceptional prevention focused work currently taking place within Districts - risk of this being diluted through merging into larger councils
Visitor economy	Visitor spend in region	Risk of loss of promotion of urban areas if integrated into wider councils - the appeal of the area is very diverse, making it harder for a council with a mix of urban and rural areas to market the appeal to those different visitor groups
Homelessness prevention	Number of homelessness applications	Solutions to homelessness (or the factors that help prevent it) are often household-specific and reliant on a high degree of flexibility, creativity, local connections and partner organisations, which are easier to build and sustain on a smaller footprint.
Children social care	Costs of looked after children	Nationally evidenced report showing links between average cost of provision and size of councils
Adult social care	Costs of residential and nursing care	National evidenced report showing links between average cost of provision and size of councils

Baseline for each measure

Table A.2 sets out the baseline position and source for each measure used for calculating the benefits.

Table A.2 Baseline Position and Source for each Output Measure

Measure	Baseline (per year)	Source / justification
Job creation	4,294	Number of new workers required per year in Gloucester (Gloucestershire's Economic Strategy - Economic Evidence Base 2023)[10]
Small business survival	3,155	UK Business Count of Micro Enterprises within Gloucester (2024)[11]
Investment within area / region	£50m pa	Over £1 billion invested in Gloucester over last two decades (averaged)[12]
Cultural engagement	78,000	Number of people attending local cultural events where numbers were recorded[13]

[10] https://www.gloucestershire.gov.uk/media/bzle1nc5/evidence-base-2023-executive-summary.pdf (page 39)

[11] https://www.nomisweb.co.uk/reports/lmp/la/1946157375/report.aspx (in businesses section)

[12] https://www.investgloucester.co.uk/regeneration-in-gloucester/

[13] https://democracy.gloucester.gov.uk/documents/s62656/Appendix%201%20Review%20of%20Festivals%20and%20E

Crime & disorder	£105.375m	Total number of instances of crime[14] multiplied by the published figures on cost of crime by type[15] (inflated to current day costs)
Visitor economy	£124.207m	3-year average of visitor spend (prior to Covid years) in Gloucester[16]
Homelessness prevention	275	Average number of people per year prevented from becoming homeless due to action from Gloucester City officers[17]
Children social care (cost of children in care)	£82.599m	Proxy for cost of children in care, by multiplying number of Children in Care in Gloucestershire (815) by national average weekly cost of placement in an authority over 500,000 population (£1949 pw), multiplied by 52 weeks[18]
Adult social care (cost of residential and nursing care)	£116.465m	Proxy cost by multiplying number of Residential and Nursing placements in Gloucestershire (1,317 and 655 respectively) multiplied by the national average weekly cost of placement in an authority over 500,000 population (£1,160pw and £655pw), multiplied by 52 weeks

Impact per unit

Unit values for each (dis)benefit were also determined by a research review, using Government approved figures where possible, peer assessed national or internation research if not, then local pilots if neither of these were available. The figures used and their sources are contained within Table A.3.

Table A.3: Unit values used to calculate gross economic impacts [EXAMPLES]

Assumption	Value	Justification
GVA per job created / per micro business surviving	£67,640	Average GVA in region 2023 [19]
Value per person engaging in cultural activity	£1,498.35 per person	DCMS Commissioned report calculating welfare benefit of sports and cultural activities

vents%20Activity%202024-25.pdf

[14] https://www.plumplot.co.uk/City-Gloucester-crime-stats.html

[15] https://www.gov.uk/government/publications/the-economic-and-social-costs-of-crime

[16] https://www.visitbritain.org/research-insights/england-domestic-tourism-regional-and-subregional-data

[17] https://www.gloucestershirelive.co.uk/news/gloucester-news/300-new-homelessness-cases-each-9199888

[18] Local Government Reform - An Adult and Children's Service's Lens, Peopletoo, presented to Chief Executives Forum of District Council's Network in July 2025

[19] https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/labourproductivity/datasets/subregionalproductivitylabourproductivitygvaperhourworkedandgvaperfilledjobindicesbyuknuts2andnuts3subregions (table b3 - Column Y)

		(inflated for years since published at 3.5% pa)[20]
Crime & Disorder	%age change	Measure is already direct economic impact, therefore forecast %age change by each option is appropriate to use to measure the impact
Visitor Economy	%age change	Measure is already direct economic impact, therefore forecast %age change by each option is appropriate to use to measure the impact
Cost impact on a homelessness application	£218.307 per person	Research by Xantura on costs of homelessness including both direct costs and welfare impact on individuals affected[21]
Children Social Care	%age efficiency difference	Percentage difference between average unit costs for a 500,000+ size council compared to the relevant size council(s)
Adult Social Care	%age efficiency difference	Percentage difference between average unit costs for a 500,000+ size council compared to the relevant size council(s)

Estimate of Impact per Option

For each option, the relative impact was measured. Ranges were modelled unless fully based upon external data (i.e. the savings associated with social care), although for reporting purposes these were combined using Monte Carlo analysis - essentially multiplying the value of each outcome by the estimated probability of it happening to get a single figure, rather than a range.

Value of benefits

Table A.4 shows the range for each output measure and the expected value within that range for each option. Each is presented here as a percentage change away from the current baseline.

Table A.4: Estimates of the range and expected value for each output measure per option compared with current position (low = greatest disbenefit or smallest benefit)

Measure	A	B	C
Jobs Created (absolute number see below)			
Micro businesses sustained	-5%	-2.5%	0%
Investment change	-10%	5%	0%
Cultural engagement	-5%	-2.5%	0%
Crime rates	2%	1%	0%
Visitor economy	-1%	-0.5%	0%
Homelessness prevention	-20%	-10%	0%
Children Social Care	0%	11.85%	4.14%
Adult Social Care	0%	10.13%	-2.96%

* 1% Across the wider Gloucestershire geography rather than Gloucester specific

[20] https://www.sportengland.org/media/11240/moves-v2-se-final-nov16.xlsmhttps://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/304899/Quantifying_and_valuing_the_wellbeing_impacts_of_sport_and_culture.pdf (Table 6 - p9)

[21] https://xantura.com/wp-content/uploads/2022/11/The-Risks-and-Costs-of-Homelessness.pdf

Multiplying the percentage to the baseline got the absolute change fed into the benefits model to calculate the gross economic impact. Table A.5 shows the calculated figures for each option - in this context it is the change away from the current model, so a zero would be no expected change from the current two-tier model.

Table A.5: Figures used to calculate economic impact per model (per annum)

Measure	A	B	C
Jobs Created	(100)	(50)	0
Micro businesses sustained	(157)	(78.5)	0
Investment change	(£5m) pa	(£2.5m) pa	0
Cultural engagement	(3,850)	(1,925)	0
Crime rates	2% inc	1% inc	0
Visitor economy	(£1.242m)	(£0.621m)	0
Homelessness prevention	(55)	(27.5)	0
Children Social Care	0	£9.788m	£3.420m
Adult Social Care	0	£11.798m	(£3.447m)

* Fed into each individual crime rate

Gross economic impact

The gross economic impact for each measure can be taken by multiplying the change in units by the benefit per unit (except in the case of physical activity where a specialised model is used to calculate the expected impact). These figures are combined with the financial projected savings (as additional benefits) and transition / one-off costs (as additional disbenefits). These gross economic impact of these benefits modified by two additional adjustments:

- An additionality adjustment
- A time-discounting factor

Additionality Adjustment

The following factors elements were considered for each benefit:

- Leakage - benefits going to people outside the target area (e.g. health benefits from people coming from overseas participating in leisure activities generated by a scheme)
- Displacement - benefits lost because individuals swap from another activity which would also have provided similar benefits (e.g. when a job created is taken by someone already in full time employment and their previous role is not re-filled)
- Substitution - benefits lost because companies change their decisions because of the scheme (e.g. they don't repair a building themselves, because they can get a grant to support it)
- Economic multiplier - the wider supply chain and regional impact of the benefit (e.g. construction work having a beneficial impact on the local supply chain)
- Deadweight - what would happen even if the project didn't go ahead (e.g. general rises in commercial or house prices)

Each economic impact was assessed by the project to assess the likely impact of each factor, using the reference cases set out in the Additionality Guide and HCA Additionality Guide as starting points, supplemented with local knowledge and sector specific research. Appendix D sets out for each benefit the

values used for each factor and the reasoning behind this.

Time discounting factor

All benefits were then combined with the direct calculated impact from the financial model (both the ongoing savings and transition costs). All results are then discounted by the Governments Green Book value of 3.5% per year. Discounting is used to reflect the fact that a benefit today should be valued higher that the same benefit in the future.

Overall position per option

The combination of all these factors combined, gives the calculated Net Present Value of Benefits for each option. These are presented in the Table A.7 - A.9 below.

Table A.7: Overall economic impact calculation of Option A

Category	**Option A**			
Economic impact category	**Gross impact (£m)**	**Additionality adjustment (£m)**	**Discount (£m)**	**NPV of impact (£m)**
Economic benefits				
Ongoing savings	186.696	0.000	(33.993)	152.703
Sub-total economic benefits **(A)**	**186.696**	**0.000**	**(33.993)**	**152.703**
Economic disbenefits				
Transition costs	(20.833)	0.000	0.000	(20.833)
Job Creation	(67.640)	30.165	6.309	(31.167)
Small Business Survival	(106.195)	86.841	3.258	(16.096)
Investment in area / region	(17.845)	3.102	2.482	(12.262)
Cultural Engagement	(57.686)	36.379	3.587	(17.720)
Crime & Disorder	(19.060)	4.765	2.406	(11.888)
Visitor Economy	(12.421)	5.539	1.158	(5.723)
Homelessness Prevention	(120.069)	37.942	13.825	(68.302)
Sub-total economic disbenefits **(B)**	**(421.749)**	**204.733**	**33.025**	**(183.991)**
Overall economic impact (A+B)	**(235.052)**	**204.733**	**(0.967)**	**(31.288)**

Table A.8: Overall economic impact calculation of Option B

Category	**Option B**			
Economic impact category	**Gross impact (£m)**	**Additionality adjustment (£m)**	**Discount (£m)**	**NPV of impact (£m)**
Economic benefits				
Ongoing savings	120.667	0.000	(22.459)	98.208
Children Social Care	88.091	(35.237)	(9.688)	43.167

Adult Social Care	106.181	(42.472)	(11.677)	52.032
Sub-total economic benefits **(A)**	**314.939**	**(77.709)**	**(43.823)**	**193.407**
Economic disbenefits				
Transition costs	(26.913)	0.000	0.000	(26.913)
Job Creation	(33.820)	15.082	3.154	(15.583)
Small Business Survival	(53.097)	43.420	1.629	(8.048)
Investment in area / region	(8.923)	1.551	1.241	(6.131)
Cultural Engagement	(28.843)	18.190	1.793	(8.860)
Crime & Disorder	(9.530)	2.382	1.203	(5.944)
Visitor Economy	(6.210)	2.770	0.579	(2.862)
Homelessness Prevention	(60.034)	18.971	6.913	(34.151)
Sub-total economic disbenefits **(B)**	**(227.371)**	**102.366**	**16.513**	**(108.492)**
Overall economic impact (A+B)	**87.568**	**24.658**	**(27.311)**	**84.915**

Table A.9: *Overall Economic Impact Calculation of Option C*

Category	**Option C**			
Economic impact category	**Gross impact (£m)**	**Additionality adjustment (£m)**	**Discount (£m)**	**NPV of impact (£m)**
Economic benefits				
Ongoing savings	115.928	0.000	(21.577)	94.351
Children Social Care	30.776	(12.310)	(3.385)	15.081
Sub-total economic benefits **(A)**	**146.704**	**(12.310)**	**(24.961)**	**109.432**
Economic disbenefits				
One-off costs	(26.913)	0.000	0.000	(26.913)
Adults Social Care	(31.026)	12.410	3.412	(15.024)
Sub-total economic disbenefits **(B)**	**(57.939)**	**12.410**	**3.412**	**(42.117)**
Overall economic impact (A+B)	**88.765**	**0.100**	**(21.549)**	**67.316**

Note there is no discount factor applies within the overall model for physical activity impact as the specialised model already applies a 3.5% discount factor within its output

Appendix D | Additionality Adjustments

All benefits were assed to determine if and how much of these would have been achieved if the project did not go ahead. This follows the principles of the Additionality Guide and ensures that naturally occurring increases are removed before considering the wider economic impact of an option. The formula used is as follows:

$$AI = [GI \times (1-L) \times (1-Dp) \times (1-S) \times M] - [GI^* \times (1-L^*) \times (1-Dp^*) \times (1-S^*) \times M^*]$$

Where:

AI = Net additional impact
GI = Gross impact
L = Leakage
Dp = Displacement
S = Substitution
M = Multiplier

* denotes reference case and hence deadweight

- Net additional impact - the final value of the benefit after the calculation
- Gross impact - the total benefit, the starting point before adjustments for this formula
- Leakage - benefits going to people outside the target area (e.g. health benefits from people coming from overseas participating in leisure activities generated by a scheme)
- Displacement - benefits lost because individuals swap from another activity which would also have provided similar benefits (e.g. when a job created is taken by someone already in full time employment and their previous role is not re-filled)
- Substitution - benefits lost because companies change their decisions because of the scheme (e.g. they don't repair a building themselves, because they can get a grant to support it)
- Economic Multiplier - the wider supply chain and regional impact of the benefit (e.g. construction work having a beneficial impact on the local supply chain)
- Deadweight - what would happen even if the project didn't go ahead (e.g. general rises in commercial or house prices) - this formula is often simplified to be a percentage of the overall benefits where a reference case is not directly calculated

The values for each of these components were considered on a benefit-by-benefit basis. The following table sets out the values used for each, per benefit.

Additionality Components per Quantified Benefit

Area / measure	Value	Justification
Jobs created		
Leakage	10%	Low leakage - Some jobs may be filled by people that choose to live elsewhere and commute, but most benefits of jobs created are expected to remain in the region
Displacement	10%	Low displacement - any jobs filled by people already employed are likely to be advertised and filled themselves
Substitution	10%	Low substitution - it is relatively unlikely that the public sector jobs will prevent similar jobs in the private sector
Multiplier	1	No wider benefit considered as the Gross Value Added element already considers the impact the employment has on the wider economy
Deadweight	24%	In line with City Challenge Regeneration schemes average (Table 3.3 of Additionality Guide)
Micro-business sustained		
Leakage	10%	Low leakage - likely to be very small for micro-businesses as their nature they are hyper-local
Displacement	10%	Low displacement - if someone finds another job after their micro-business fails then they are probably in competition with others, who will themselves lose out on employment instead
Substitution	10%	Low substitution - generally micro-businesses fill niches that other businesses are unwilling or find uneconomic to fill
Multiplier	1	No wider benefit considered as the Gross Value Added element already considers the impact the employment has on the wider economy
Deadweight	75%	Very high due to the limited direct impact the council has on the wider economic impact
Investment in the area		
Leakage	10%	Low leakage - some supply chain and materials may be sourced internationally and therefore leak out of the economy
Displacement	25%	Moderate displacement - limit overall capacity in construction industry, so any major work will have somewhat of an impact on other developments taken forward
Substitution	0%	The private sector is already carrying out this work, so there is no substitution effect
Multiplier	1.7	2.7 is average for new build projects based upon the HCA additionality guide - 1 is removed as the direct benefit of the building is not considered here
Deadweight	28%	Average for major construction schemes
Cultural Activities		
Leakage	40%	Moderate - Figure based upon survey findings of number of attendees from outside the region
Displacement	10%	Low - some people will choose council run events which would otherwise have chosen alternative cultural events, but it is

		expected this number will be relatively low
Substitution	10%	Low - some public events might crowd out private sector events, but the nature of the events are likely to limit the degree that substitution takes place
Multiplier	1	Multiplier impact already included with the valuation of the benefit
Deadweight	24%	In line with City Challenge Regeneration schemes average (Table 3.3 of Additionality Guide)
Crime levels		
Leakage	0%	Impact of crime is focussed within region
Displacement	25%	Potential for some crime to be displaced rather than stopped
Substitution	0%	No private sector investment will be offset by having a more localisation crime prevention approach
Multiplier	1	Multiplier impact already included with the valuation of the benefit
Deadweight	0%	No deadweight as measure and value already calculated through research taking into account any such factors
Visitor spend		
Leakage	10%	Low - Small leakage from visitor spend
Displacement	10%	Low - Advertising may displace customers from one location in the region to another
Substitution	10%	Low - Some advertisement / tourism strategy may reduce the advertising private companies would otherwise have to undertake
Multiplier	1	Kept low conservatively to avoid double counting (especially with GVA for employment)
Deadweight	24%	In line with City Challenge Regeneration schemes average (Table 3.3 of Additionality Guide)
Homelessness Prevention		
Leakage	0%	Impact is all within region
Displacement	10%	Low - reflecting the fact that not all homelessness applications are accepted, so some work will be on unsuccessful applications
Substitution	0%	No private sector provision impact
Multiplier	1	Multiplier impact already included with the valuation of the benefit
Deadweight	24%	In line with City Challenge Regeneration schemes average (Table 3.3 of Additionality Guide)
Adult & Children Social Care		
Leakage	0%	Impact is all within region
Displacement	0%	No displacement impact
Substitution	0%	No private sector provision impact
Multiplier	1	Multiplier impact already included with the valuation of the benefit
Deadweight	40%	Significant factor built in due to usage of national average unit data rather than actual local data, plus risks that some elements of the calculations maybe affected by external factors, such as smaller

local authorities being more prevalent in areas where costs are lower

Appendix E | Cratus Public Engagement Report

[circulated as separate file attachment]

Appendix F | Aggregation and Disaggregation Tables

Service Area	Current delivery model	Recommended Delivery Model	Level of change required	One off Transition Costs	Additional ongoing recurring costs	Aggregation Benefits
3.1 Corporate Services						
Digital & ICT	Different delivery models across the Councils. County / Tewkesbury / Glos City / Stroud - In-House Cotswold / Forest of Dean / Chelt - Publica	Two separate in-house teams, one per unitary. (Noting that some specialist functions e.g. cyber security, hardware and software may be jointly outsourced / shared across the two)	High	High	Low	Medium
Asset Management & Property	All councils currently deliver property and asset services largely in-house. However, there are external consultants and framework partners utilised for specialist services by councils. Note services previously delivered by Publica were brought in house with the exception of one health and safety advisor.	Hybrid: In-house strategic teams with some shared services of technical functions under an SLA and hosted arrangement. *Strategic ownership and direction would remain local to each authority.* *Note: This excludes commercial property*	High	Medium	Medium	Medium
Pensions	Operated and administered in-house via the Gloucestershire Pension Fund within GCC for all councils in Glos	GU is designated as the administering authority for the Gloucestershire Pension Fund; GG becomes a scheme employer within the fund (similar to current arrangements with district councils).	Low	Low	N/A	Low
Strategic Finance	In-house	Two separate in-house teams, one per unitary.	High	Medium	Medium	Medium
Insurance & Counterfraud	CFEU - Counter fraud and enforcement unit ARA - Shared service hosted by County Council for itself and Gloucester City Council and	Shared Countywide Service – Hosted in GU with traded services	Low	Low	N/A	Low

	Stroud SWAP - South West Audit Partnership					
Democratic Services	In-House across all councils	Two separate in-house , one per unitary with local delivery teams. Also combined Democratic services and elections teams into one team.	Low	Low	Low	Medium
Elections	In-House across all councils	Two separate in-house , one per unitary with local delivery teams. Also combined Democratic services and elections teams into one team.	Low	Low	Low	High
Legal Services	Mixed – One Legal between 4 councils, quasi shared service between 2 councils and in-house for county	Hybrid: shared services or hosted on day 1 – with some functions independent and traded services. Will need 2 monitoring officers	Low	Low	Low	High
Comms	In-house	Two separate in-house teams, one per unitary	Low	Low	Low	High
HR	Different delivery models across the Councils. Most - In-House Some - Publica	Two separate in-house teams, one per unitary	Low	Low	Low	High
Transactional Services incl. Payroll, AP / AR	Different delivery models across the Councils. Most - In-House Some - Publica	Shared service – hosted by GU with traded services	Low	Low	Low	High
Planning, Performance & Insight (Data)	In-house	Two separate in-house teams, one per unitary	Low	Low	Low	High
Information Governance	In-house	Two separate in-house teams, one per unitary	Low	Low	Low	High
Transformation	In-house	Two separate in-house teams, one per unitary	Low	Low	Low	High
Customer Management	In-house	Two separate in-house teams, one per unitary	Low	Low	Low	High
Internal audit	Tewkesbury – In-House Cheltenham, Cotswold and Forest of Dean – South West Audit Partnership (SWAP) Gloucestershire County – In-house service which is also provided to Gloucester City Council and Stroud.	Delivery model to be determined following an options analysis of the different options.	Low	Low	Low	High

3.2 Front-Line Upper Tier Services (Only County Council currently)						
Public Health	In-House management & advisory with a range of commissioned services	Two separate in-house, one per unitary (disaggregated). Noting that there is still likely to be joint working in some limited areas where it makes sense to retain county wide provision and economies of scale e.g. sexual health. Will need 2 DPH Could be joint commissioning of supply chain e.g - out of hours	High	Medium	Medium	Medium
Adult Social Care	ASC is delivered in-house by GCC, and the care market is managed centrally, with countywide contracts and provider relationships	Two separate in-house , one per unitary with its own DASS. (disaggregated) delivered locally. Noting: commissioning may take between 3 - 5 years to fully disaggregate. Commissioning jointly on areas e.g - tech enabled care	High	High	High	Medium
Childrens	Mixed Delivery Models The service is managed overall in-house but there are also a number of elements of the service commissioned out e.g. Family and Youth Hub development	Two separate in-house , one per unitary (disaggregated) each undertaking their own commissioning and statutory partnership arrangements Will need 2 DCS and become 2 members of Adoption West	High	High	High	Medium
Education	In-house Note: Cross-authority music service	Two separate in-house , one per unitary *(disaggregated)*	High	High	High	Medium
Archives	In-house	Shared Countywide Service - Hosted by GG given this is where the Heritage Hub is (Gloucester)	Low	Low	Low	N/A
Transport & Highways	In-House With outsourced service delivery	Two separate in-house , one per unitary (disaggregated) Commissioning but flexibility on supply chain (over the long-term) but on day 1, may have to have the service hosted in one authority and providing services to the other.	High	High	High	Low
Fire & Rescue	In-House - GCC currently holds the governance and service responsibilities.	Independent Fire and Rescue Authority	High	High	N/A	N/A

Trading Standards	In-house	Two separate in-house teams, one per unitary	Medium	Low	Low	N/A
Coroners	In-house	Shared Countywide Service (Hosted) - Hosted by GG as the Coroner's court is located in Gloucester	Low	Low	Low	N/A
Libraries	In-House	Two separate in-house , one per unitary (disaggregated) Joint Library Management System	Low	Low	Low	Low
Registrars	In-House	Shared Countywide Service - Hosted TBD which authority would be the host with shared Proper Officer	Low	Low	Low	N/A
Employment and skills	In-House	County wide, Hosted by one authority	Low	Low	Low	N/A
3.3 Front-Line Lower Tier Services OR Both (Only Districts OR both County and Districts currently)						
Public Protection	Mixed. Most services are delivered in-house by district councils though Publica provides services for Forest of Dean and Cotswold with some local differences. There are also some services (in some councils) contracted out e.g stray dogs, contaminated land.	Two separate in-house teams but with some specialist functions shared e.g. contaminated land.	High	Medium	N/A	High
Emergency Planning	In-House across all councils currently	Two separate in-house teams with opportunity for joint working	Low	Low	Low	Low
Revenue & Benefits	In-House Cotswold and FoD via Publica	Two separate in-house teams Consider merging customer services	High	High	N/A	Medium
Cemetery and crematorium	In–house across all 7 councils	Two separate in-house teams	Medium	Medium	N/A	Medium

Housing Strategy, Maintenance & Homelessness	Mixed - All councils have some elements in-house but note: Stroud and Chelt have in-house DLOs and their own housing stock. FoD and Cotswold have shared housing staff in Publica (shared with West Oxfordshire too) Glos City host the Strategic Housing Partnership which is countywide across all 7 councils. All councils commission some services externally	Hybrid - Each UA would operate some services in-house and some under shared arrangements (hosted by one authority)	High	High	Medium	High
Climate & Sustainability	In-House teams in each council but there is also a county-wide Climate Leadership Gloucestershire Team managed by Glos City.	Two in-house teams, with a shared partnership forum for collaboration	High	Medium	Low	Low
Economic Development	All councils have in-house ED capabilities noting variations in terms of scope of services, structures and extent of partnership working	Two in-house teams but with countywide partnership working (where needed)	High	Medium	N/A	High
Tourism & Visitor Economy	All Councils have small in-house local tourism teams but they are all also part of (and put varying amounts of funding towards) the Cotswolds Plus Local Visitor Economy Partnership (LVEP).	Strategic Countywide Visitor Economy Function with Local Place Marketing Not yet been determined if the strategic element would be in-house or as a separate organisation	Low	Low	N/A	High
Leisure	Stroud - In-House model 5 of the 6 councils outsource provision (3 to Freedom Leisure; CBC to the Chelt Trust and Tewkesbury to Places Leisure)	Harmonisation of current contractual positions over time to move to a sustainable and aligned model	High	Medium	N/A	Medium

Culture & Heritage	Mixed A number of councils have this in-house; Cotswold outsource running of museum to Freedom Leisure; A lot of partnership working e.g. Glos City have a strategic partnership with Gloucester Culture Trust	Codesigned future delivery models with the sector and communities with a consideration of future implications related to devolution	TBD based on delivery models that are chosen	TBD based on delivery models that are chosen	TBD based on delivery models that are chosen	TBD based on delivery models that are chosen
Planning	In-house	Two separate in house teams	High	Medium	Medium	Medium
Building Control	Mixed - Some in-house and some with shared arrangements e.g - Gloucester City and Stroud partnership / Cheltenham and Tewkesbury	Delivered as a shared service across both UAs, with joint governance, shared systems, and local operational teams	Medium	Medium	N/A	Medium
Development & Regeneration	In-house	Two separate in house teams	Medium	Medium	N/A	Medium
Waste & Environmental Services: Waste disposal and HRCs	Mixed Delivery - Through in house teams and contractors such as Ubico and FCC (Javelin Park)	Ubico co-owned and co-commissioned by two UA's HRCs: Ubico continue to manage HRC Operations FCC: GU would provide due to Javelin Park location	Low	Low	N/A	Medium
Waste & Environmental Services: Waste collection	Delivered via Ubico	Remain delivered by Ubico, commissioned by two UA's	Low	Low	N/A	Low – *Consistency and standardisation*
Waste & Environmental Services: Environmental Services	Mixed Delivery - in house team with some elements contracted out, some delivered by Ubico e.g tree planting	Ubico commissioned by GG. Two separate in-house teams, GU model would be mixed	Medium	Medium	N/A	Medium
Parking	Mixed. Most services are delivered in-house by district councils though Publica provides services for Forest of Dean and Cotswold with some local differences.	Two separate in-house teams for management and notice processing. Outsource physical enforcement	High	Medium	Low	Medium

	All enforcement activities at GCC are outsourced					

Appendix G | Equality Impact Assessment

Directorate: All	Service: All
Accountable Officer: Ruth Saunders	
Date of assessment: 30.09.25	Who was involved in completing this assessment? One Legal, Managing Director, Head of Transformation and Commissioning, Policy and Governance Manager
Name of service/function/policy/strategy or process: Greater Gloucester/Gloucestershire proposal for LGR	
Is this new or existing? New	
Why has this change been proposed? Government policy change	

Part 1 – Screening

1.1 Please provide an Executive Summary of this service/function/policy/strategy or process, including the reasons behind the proposed change and who will deliver this service. Remember to demonstrate how you have shown due regard to both negative *and* positive aspects, for example:

Negative

- Discrimination, harassment, victimisation and any other prohibited conduct (state how you will eliminate this)
- Prejudice and lack of understanding (how will you foster good relations between people to tackle prejudice and promote good understanding?)
- Which protected characteristics could be negatively affected by this change? Use the table in question 2 to explain these fully

Positive

- Who is to benefit from this change, and what positive opportunities does this offer to Gloucester (residents, GCC and partner agencies)
- Advance equality of opportunity: (remove or minimise disadvantage; meet people's needs; take account of disabilities; encourage participation in public life). (Does not apply to marriage and civil partnership or pregnancy and maternity)
- How might ABCD approaches be implemented?

The main purpose of local government reorganisation is to create simpler governance structures that deliver better outcomes for residents, enhance local accountability and achieve efficiency savings that can be reinvested in public services.

The English Devolution White Paper outlines central Government's plans to replace the current two-tier system of district and county councils with a single tier of local government. This would establish larger, unitary authorities that are responsible for delivering all local government services within an area.

For Gloucestershire there are three proposals being developed and Gloucester City Council is leading on the 'Greater Gloucester/ Gloucestershire' 2 unitary proposal. The work is outlined in the interim report to Cabinet in March 2025 and the report to Council in September 2025.

This EIA focuses on the Greater Gloucester/ Gloucestershire two unitary proposal, not LGR itself as that is a decision which has already been taken by Central Government and is outside of our control. This EIA informs and supports the case for Greater Gloucester/Gloucestershire and responds to the needs and concerns of Gloucester city residents and stakeholders, including those captured within the expanded Greater Gloucester footprint; it also complements the wider two-unitary model for Gloucestershire, as part of a joined-up examination of resident and stakeholder needs across the county.

1.2 Which groups could be affected by this change, in either a negative or positive way? Please include the evidence (i.e. consultation/research) as to how you reached this decision.

(Positive – it could benefit, **Negative** – it could disadvantage, **Neutral** – neither positive nor negative impact or **Not sure?)**

'Protected Characteristic'	Type of impact (Positive, Negative or Neutral)	Reason	Evidence base for decision
Age	Negative (short-term), Positive (long-term)	Short-term risk of confusion and disruption for older people due to changes in service access; long-term opportunity for integrated, person-centred services.	Experience from previous reorganisations (e.g. Somerset, Dorset) shows initial disruption, but also demonstrates that joined-up services can improve outcomes for older people. Local engagement highlights concerns about transition, but also support for the ambition of better, more accessible services.
Disability	Negative (short-term), Positive (long-term)	Short-term disruption and risk of digital exclusion; long-term improvements through integrated service design and data sharing.	National and local evidence (including feedback from disability groups) indicates that change can be unsettling, but that well-designed, joined-up services can significantly improve accessibility and outcomes for disabled residents.
Gender	Neutral	No direct impact identified.	No evidence of differential impact from local data or engagement.
Marriage & Civil Partnership	Neutral	No direct impact identified.	No evidence of differential impact from local data or engagement.
Pregnancy & Maternity	Neutral	No direct impact identified.	No evidence of differential impact from local data or engagement.
Race (including Gypsy & Traveller)	Neutral	Larger footprint of the Greater Gloucester area may improve ability to identify and provide sites for Gypsy & Traveller communities. The reduction of footprint of the remaining	Local data shows previous difficulty in site provision; expanded area increases opportunities for the more urban centre.

		Gloucestershire area so the impact is therefore neutral.	
Religion/Belief	Neutral	No direct impact identified.	No evidence of differential impact from local data or engagement.
Sexual Orientation	Neutral	No direct impact identified.	No evidence of differential impact from local data or engagement.
Transgender	Neutral	No direct impact identified.	No evidence of differential impact from local data or engagement.
Community Cohesion	Neutral	No immediate impact identified; long-term potential for stronger local identity and engagement in the Greater Gloucester area but this may be reduced for the wider area.	Evidence from other unitarisations suggests improved community engagement over time.
Other Socio-economic Groups (e.g. Single Parents)	Positive	Opportunity to address inequalities through targeted, joined-up support.	National research and local data suggest integrated services better support vulnerable groups so reducing from 7 Councils to 2 is likely to show benefits.
Any Human Rights implications?	None	No direct impact identified.	No evidence of human rights implications from local or national sources.

1.3 Is any part of this policy/service to be carried out wholly or partly by contractors?

If yes, please consider equalities impact through procurement.

☐ Yes ☒ No

1.4 Is a Full People Impact Assessment required? If you have identified any potential or actual negative impact you will need to complete a Full People Impact Assessment (Part 2 below)

☐ Yes ☒ No Date it is to be completed: N/A

This page is intentionally left blank

Strong Places, Stronger Gloucestershire: The case for East and West Gloucestershire. One county, two unitary councils.

Foreword from the Leader of Cheltenham Borough Council

Gloucestershire is a proud and diverse county, home to historic towns, vibrant cities, and thriving rural communities. As local leaders, our responsibility is not only to protect what makes each place special, but to build a future in which all parts of Gloucestershire can flourish.

Leadership in local government is about serving people in ways that make sense to them. We did not ask for local government reorganisation. But if reform is to happen, it must be done once and done right – not for the next few years but for the next fifty years. How we reform matters just as much as whether we reform.

At this critical moment, the question should not be *"how do we merge councils to maximise efficiency?"* but *"how do we redesign local government so that it works better for residents over the long-term?".* This is about building resilience and impact that lasts – not just structural tidiness that saves money but weakens over time.

A two unitary model offers a smarter way forward: targeted governance and investment that foster innovation and growth in both Gloucester and Cheltenham. Two distinct authorities, each with its own urban centre and rural reach, provide balance, clarity and scale. This is a place-based response to reform, designed to endure. It creates a flexible system that supports ageing well, improves skills, expands digital access, and links housing growth with job creation – unlocking productivity and opportunity for decades to come. A single-unitary approach risks short-term cost savings at the expense of long-term resilience.

Public trust is local government's most valuable currency. It is earned through connectedness, visible results, reliable services, honesty, and representation at the right level for each place. If reform is to happen, we should get it right once and for good: decisions made as close to residents as possible and mission focused teams to deliver outcomes. This is not a case against change, it is a case for reform that reflects Gloucestershire, built to last.

Rowena Hay
Leader, Cheltenham Borough Council

1. Introduction: Redesigning for the long-term

Gloucestershire is not one place: it is a collection of places each with its own identity, economy and challenges: two urban centres driving growth in Cheltenham and Gloucester; historic market towns and Cotswold villages, post-industrial and rural communities. This diversity is Gloucestershire's strength and the reason a single model cannot serve it well.

Local Government Reorganisation (LGR) is often presented as a tidy exercise: unitaries of 500,000 residents or more, streamlining services, and delivering savings. But these are short term goals. The decisions made now will shape Gloucestershire for a generation.

A single unitary serving 659,000 people would flatten Gloucestershire's diversity into county-wide averages. Forcing trade-offs between fundamentally different priorities: Gloucester's regeneration or Cheltenham's tech growth; clean energy or cyber security; rural isolation or rapid ageing. It risks creating distance between residents and decision-makers and centralising power in ways that weaken accountability.

Two unitaries, one serving the West (Gloucester, Stroud, and the Forest of Dean) and one serving the East (Cheltenham, Tewkesbury, and the Cotswolds) offer a better alternative: councils that are both strategic and connected, large enough for capability yet small enough for trust and focused enough to drive economic growth in distinct sectors.

Financially, a single authority performs marginally better on narrow metrics, largely because it avoids disaggregation costs, an unavoidable short-term feature of any county split. But financial efficiency without democratic legitimacy, economic focus, or community connection is a false economy. The two-unitary model delivers substantial savings (£56m over 10 years) while preserving what makes reform sustainable: trust, agility, and connection.

This document sets out 5 strategic reasons why a two-unitary model is the right reform for Gloucestershire, a model designed to work not just today, but for the next fifty years:

1. **Distinct place identity and economic opportunity**: Gloucestershire's unique two centres of gravity, Cheltenham and Gloucester, and their contrasting geographies demand distinct leadership to unlock their full economic potential.
2. **Getting scale right**: Councils of 310–350,000 residents balance capability with connection; the 500,000 benchmark misunderstands modern devolution.
3. **Redesigning how local government works**: Two councils enable scaled prevention, strategic housing delivery, and growth rooted in place.
4. **Building democratic legitimacy**: Two councils reflect Gloucestershire's political diversity and maintain representation that people can reach and trust.
5. **Reform that endures**: A structure designed to last agile, connected, and sustainable, avoiding unnecessary complexity or future restructuring.

2.Five Strategic Arguments for Two Unitaries

2.1 Distinct Place Identity and Economic Opportunity

Gloucestershire has two natural centres of gravity, Gloucester in the west and Cheltenham in the east, each surrounded by distinct communities with different needs, opportunities, and civic cultures. **They are not competing priorities to be balanced, but complementary strengths that need focus.**

The West

Gloucester, Stroud and the Forest of Dean are positioned to lead Britain's clean-energy and sustainable industry transition. There is a strong environmental and voluntary community group presence alongside heritage rooted in manufacturing, forestry and waterways. There is rural deprivation alongside urban opportunity. A western unitary would unite these strengths under one coherent approach to clean energy, land use, and sustainable innovation, that together drive regional prosperity.

The East

Cheltenham anchors the UK's cyber-security ecosystem, complemented by fast emerging agri-tech and advanced engineering. With the world-class asset of GCHQ alongside the Golden Valley Development, the eastern economy fuses cyber security, engineering and digital technology. An eastern unitary would cement Cheltenham's position as a critical part of the UK's technology and security industry while building digital capability.

Why two clusters need two unitaries

These are real economies with distinct institutions, supply chains and investment narratives. Economic clusters succeed through proximity, specialisation and clarity. One large authority would blur these strengths, slow decisions and risk Gloucestershire's growth potential. Two unitaries would instead:

- Provide dual engines of growth and specialist strategies and leadership
- Deliver faster, clearer decisions on investment opportunities.
- Strengthen relationships with employers, universities and investors
- Position Gloucestershire as a powerhouse of innovation, skills and sustainable growth.

2.2 Smarter Scale: Right Sized for Connection and Capability

Each proposed unitary would serve 310,000 and 350,000 people, large enough for strategic capability and financial resilience, small enough to remain connected and agile. **Scale is not neutral. Too small and councils lack the capacity, too large, and they lose connection. Public trust is earned through proximity and responsiveness.**

The Government's notional 500,000 resident threshold is not a legal requirement nor a measure of success. Uniform thresholds ignore what modern devolution demands, agility, partnership and a sense of place. For Gloucestershire, right-sizing means structures that reflect:

- **Dual growth centres**: in Gloucester and Cheltenham, few other areas have that potential.
- **Contrasting geographies**: cathedral cities to national forests, Regency spa towns to Cotswold villages with contrasting opportunities and challenges.
- **Nationally important** but fundamentally different **economic clusters** with clean energy in the West and cyber security in the East.
- **Diverse communities** with different challenges, from deprivation, ageing and rural isolation in differing combinations.

Two unitaries strike the balance – big enough to work, small enough to be connected, delivering:

- **Faster, clearer decision-making:** Fewer layers between problem and solution—decisions made faster, locally.
- **Councillors rooted in their communities:** Reflecting Gloucestershire's political diversity.
- **Strategic housing delivery at the right scale:** Growing homes where they're needed, in ways that make sense to local communities and build support.
- **Staff who know their communities:** Front-line teams connected to place, able to spot needs early and intervene with prevention.
- **Services tailored to local need:** Not diluted into large-unitary compromises.
- **Stronger, more responsive partnerships** with local enterprise and civic networks.

A 659,000-resident single authority would require additional or strengthened local governance arrangements to preserve local voice thereby adding layers rather than removing them. **Scale must serve connection, not replace it.** The two unitaries achieve that balance, keeping accountability strong without adding complexity.

2.3 Redesigning How We Work: Prevention, Housing, and Local Impact

LGR must be about how to redesign councils, so they work better for residents over the long term. Reform must create the conditions to rethink service delivery in three critical areas for Gloucestershire prevention, housing and economic growth.

- **Prevention:** Proximity enables it. When councils know their communities deeply, data is visible, teams empowered and relationships trusted, staff can intervene early without having to navigate a large unitary structure and process, reducing demand and building resilience.
- **Housing done strategically:** Communities back housing that meets local need, connects to jobs and comes with the right infrastructure. Two unitaries make that possible through credible engagement and balanced planning.

- **Growth rooted in place:** Economic opportunity depends on agility and trust. Councils that know their patch can partner effectively, move at pace, and attract investment that reflect local strengths.

This is what redesigning and reform really means. It's not about administrative tidiness; it's about creating the conditions for councils to deliver visible outcomes, locally and sustainably over the long-term. Two unitaries make that vision deliverable, councils that are agile, trusted and designed for modern public service.

2.4 Democratic Legitimacy and Political Deliverability

Gloucestershire's political geography mirrors its diversity. The east and west of the county have distinct political profiles, each with its own civic culture and community priorities. **A single authority would concentrate representation and risk reducing local accountability.** Two unitaries would preserve balanced democracy, allowing each area to reflect its electorate and priorities.

Two unitaries provide a path that is **politically viable, locally credible, and commands trust**. A single unitary authority:

- Reduces local representation, with fewer councillors covering larger areas with less political diverse representation.
- Requires sweeping democratic reorganisation and likely more local governance, adding to the complexity and creating a strategic gap between a big single unitary and communities.
- Concentrate power in ways that feel distant, technocratic, and unaccountable.
- Create a legitimacy gap from day one.

By contrast, the two-unitary model:

- Builds on existing legitimacy and established civic relationships.
- Ensures balanced representation reflective of Gloucestershire's political diversity.
- Keeps decisions closer to communities, with councillors rooted in the places they represent.
- Commands broad-based support from those who know Gloucestershire best.
- Gives staff and members confidence that change is being led with care.
- Creates two strong voices to speak up for Gloucestershire at the regional and national level, doubling our presence and influence in devolution and government discussions.

In an era of fragile public trust, legitimacy cannot be an afterthought, it must be designed in. The two-unitary model starts with credibility – rooted in connection, clarity and with representation people can reach.

2.5 Reform that Endures: Choosing the Council We Want to Become

LGR invites Gloucestershire to choose what kind of councils it wants to build. **The opportunity is to design organisations that are:**

- **Prevention-first, data-driven and locally accountable.** Intervening early, using data to predict need, designing services around outcomes and answerable to the communities they serve, not distant oversight.
- **Mission-focused, with fewer layers and empowered teams.:** With clear roles, fewer layers, and autonomy for teams close to delivery.
- **Coherent, connected and financially strategic:** Intervening where it matters.
- **Agile and adaptive:** Able to grow and adapt to what communities need over time, stay flexible to national changes, and local need

The risk of focusing on scale and short-term efficiency is creating councils that are:

- Larger but slower.
- Structurally tidy but functionally weaker.
- Distant from residents and less responsive to need.
- Overwhelmed by integration complexity and legacy systems.

A single unitary of 659,000-resident authority would almost certainly require extra civic infrastructure – new parish councils, new precepts, more tiers of governance, and prolonged disruption.

The two-unitary model keeps reform simple, purposeful and human. They build on trusted structures, deliver genuine change without bureaucratic overreach and channel energy into service improvement rather than structural integration.

Boldness in reform is not about size, it is about leadership, about clarity, honesty and confidence that different can be better and a focus on the long-term**. The two unitary model embodies that choice: i**t prioritises connection over scale and designs a system built to last.

3. The Financial Context: Efficiency with Legitimacy

On headline business case figures, a single unitary delivers marginally higher savings, because it avoids disaggregation costs, particularly for children's and adult services. These transition costs are not a flaw in the two-unitary proposal, they are a feature of any reform creating more than one council. Other large counties such as Essex are also exploring multi-unitary councils for precisely this reason: **place-based legitimacy should not be ruled out over structural simplicity.** The recent decision in Surrey County also underlines the fact that any costs of disaggregation should not simply over-ride the need for reform.

The financial analysis by Price Waterhouse Coopers (PwC) shows that the net recurrent savings from the 2 unitary model is 1.3% of total expenditure in 2028/29 compared to 2.5% for the 1 unitary model. This is a marginal difference given the opportunities for economic growth and the forthcoming Fair Funding Review changes.

Every local government reorganisation business case contains financial modelling that attempts to project accuracy but is ultimately a collection of assumptions and estimates. Even the most comprehensive financial model can never fully reflect the financial reality of an established council, nor capture the impact of the way members make decisions shaped by the needs and views of the residents they represent. In this context it is important to put forward the limitations of the financial modelling completed by PwC thus far:

- The **model is heavily focused on financial efficiencies** through economies of scale, particularly in back-office functions and service delivery
- This **mechanistic, spreadsheet-driven logic** overlooks the **complex, relational nature** of local government services, especially those involving social care, housing, and community engagement
- Activities like **early intervention, prevention, and community support**—often delivered more effectively by smaller authorities—are **difficult to quantify** and thus underrepresented in the model
- The **model makes no allowance for a reduction in performance on in-year council tax collection** rates, which can be anecdotally evidenced. Gloucestershire districts collectively have an in-year collection rate of council tax of 97.8% (based on 2024/25) which compares favourably to recently created unitaries like Somerset 96.67% and North Northamptonshire 94.92%. A 1% reduction would equate to £4.7m. It is highly likely that bringing six districts together to deliver transformation would create at least some drop in collection performance.
- The **model is limited in that it is only able to profile the timing of savings at a high level on a year-by-year basis**. The two-unitary solution will be quicker and simpler to bring together services from three district councils rather than six. The on-going savings will therefore be delivered quicker and will provide a platform for further transformation savings.
- The **model does not include any additional costs for supporting neighbourhood working which would be required in a single larger unitary** which is more remote from its population and would reduce annual savings.

The analysis in business case assumes one of the two new councils (the West) could begin with a modest deficit due to existing cost distribution, but that position would not be allowed to stand. Transition

planning would include resource equalisation and smoothing mechanisms to ensure both new councils start sustainably. Moreover, the modelling cannot account with confidence, for the forthcoming Fair Funding Review, which will rebalance national allocations to reflect deprivation, rurality, and demand. This will strengthen the financial sustainability of both authorities, particularly the West, **making the current figures a conservative baseline rather than a forecast of real risk.**

Under the two unitary financial position:

- Net annual savings are estimated at **£10.8m, compared with £21.1m for a single authority. The difference is marginal on an annual budget of over £850m, (1.3% v 2.5%) and reflects the estimated disaggregation costs rather than ongoing inefficiency; it does not account for the model limitations set out above.**
- Transitional pressures are manageable, and both authorities would be financially sustainable.
- Cost is only one **part of the equation; reform that sacrifices legitimacy, service resilience or staff morale for marginally higher savings is a false economy**.

In short: **the two unitary authority model, achieves comparable financial benefits with far stronger legitimacy, accountability and resilience.**

What financial models miss

Financial modelling focuses on structure, not strategy. It can calculate the cost of merging teams or closing offices, but it cannot quantify the value of agility, trust, or economic opportunity or the cost of getting reform wrong. **Four areas are routinely underestimated:**

1. **Economic opportunity costs:** A large, slow-moving authority, risks losing investment opportunities the foregone GVA would dwarf any structural savings.
2. **The prevention dividend:** Smaller, connected councils can intervene early and reduce long-term demand pressures, something large authorities can struggle to do.
3. **Delivery risk:** A council that saves slightly more on paper but faces, staff attrition, and integration problems will erode those gains quickly.
4. **Democratic disengagement:** When residents don't feel heard, opposition to plans and consultations increases cost and delay.

Taken together, these risks could easily outweigh the £10 million difference between the one and two unitary options, running far higher if reform falters or legitimacy is lost.

The Real Question

The choice before Gloucestershire is not between cheap and expensive reorganisation, as the financial difference is minimal. It is between:

- A single large authority that maximises short-term structural savings but risks losing local connection and the ability to maximise opportunities; or

- Two focused authorities that deliver substantial saving while preserving legitimacy, agility and economic leadership for the long-term.

Efficiency without effectiveness is false economy. The two unitary model delivers both: responsible savings and resilient structure, aligning financial prudence with democratic strength and long-term sustainability.

4. Conclusion: What This Achieves for Gloucestershire

A two-unitary model delivers reform that is credible, connected and built to last, a design that serves Gloucestershire not just for the next few years, but for the next fifty.

✓ **Right sized for agility and connection:** large enough for strategic capability and savings, small enough to stay close to people and place and adapt to changing needs over time.

✓ **Financially strategic**: investing where it matters, managing money carefully rather than simply cutting cost.

✓ **Redesigned services, not just merged structures**: reform that rethinks delivery, not administration.

✓ **Scaled-up prevention**: early intervention made possible by proximity, data and trust.

✓ **Strategic housing delivery**: homes that make sense locally, supported by the right infrastructure.

✓ **Locally rooted economic growth**: investment and jobs driven by councils that know their patch and can move at pace. Reflecting Gloucestershire's dual economic centres and nationally important clusters.

✓ **Stronger local democracy:** councillors who live closer to the people they represent, political diversity, decisions made faster, and communities with a genuine voice.

✓ **Two strong voices for Gloucestershire**: doubling the area's influence in regional and national partnerships.

✓ **Mission-focused teams**: energy and resources flowing to the front line, not lost in bureaucracy

✓ **Reform that works with the grain of Gloucestershire:** aligned with its geography, identity, and civic culture without adding complexity and democratic gaps.

The question is not whether we change, but how we change and whether that change reflects the reality of the communities served. **The two-unitary model is a principled choice, not a compromise. It rejects the "lift and shift" structural reform in favour of real service redesign.**

It is a choice for long-term ambition over convenience. It challenges the assumption that bigger is always better and frames ambition within Gloucestershire's geography, identity and civic culture.

Leadership in local government is about making principled choices. We can design structures that bring decisions closer to residents, connect staff to impact, and earn public trust through visible, reliable, honest service. Or we can settle for an administrative merger that risks creating larger but weaker organisations disconnected from place and people. The two unitary model embodies that leadership – reform done once, done right, and built to last.

This page is intentionally left blank

Cheltenham Borough Council

Cabinet – 18 November 2025

Award of rent support grant to voluntary sector organisation

Accountable member:

Cabinet Member Finance and Assets, Councillor Peter Jeffries

Accountable officer:

Richard Gibson, Head of Communities, Wellbeing and Partnerships

Ward(s) affected:

St Peters

Key/Significant Decision:

No

Executive summary:

As part of Cheltenham Borough Council's wider ambitions to support a thriving voluntary and community sector (VCS), the council enables VCS groups to rent its properties through offering a rent support grant scheme.

The current policy was adopted in December 2016 which permits VCS groups to apply for a rent support grant either at the start of a lease or at the time of a rent review. Applications are scored against four criteria with the amount of subsidy awarded being proportionate to the degree to which the applicant meets the criteria.

An application for a rent support grant has been received from Cheltenham Saracens FC at St Peters Recreation Ground. This report sets out the proposed level of rent support grant to be awarded.

Recommendations: That Cabinet:

1. **agrees to the following rent support grant:**

Applicant	Recommended rent support grant
Cheltenham Saracens FC at St Peters Recreation Ground	A rent support grant of 50% of current market rent.

2. **delegates authority to the Participation and Engagement Team Leader, in consultation with the Director: One Legal to agree the terms of a rent support grant agreement with the applicant.**

---

1. Implications

1.1. Financial, Property and Asset implications

DRAFT: Saracens FC has not previously been in receipt of a rent support grant but has applied for a grant to help with the market value rent applied to the property. If Cabinet agrees to a rent support grant of 50%, this will represent a deficit of £2000 per annum to the general fund.

All usual terms and conditions will be contained within the lease in respect of rent reviews, insurance, repairs, compliance, etc, and will be monitored on an ongoing basis to ensure compliance.

Signed off by: Ela Jankowska, Finance Business Partner, ela.jankowska@cheltenham.gov.uk

1.2. Legal implications

Under S123 Local Government Act 1972, leases for a term greater than 7 years must be for the best consideration reasonably obtainable. The only exception to this is where the letting at less than best consideration contributes to the 'social, economic or environmental well-being' of the council's area or residents. Whilst leases for a term of less than 7 years do not have to be for the best consideration reasonably obtainable, the council must still have regard to its general fiduciary duty.

Granting a lease at market rent, whilst implementing a policy of grant support, means that if the tenant at any time fails to meet the grant criteria, there is no complicated legal mechanism for ensuring that the rent is uplifted to market value: the grant is simply suspended. Accordingly, the Policy for Property Lettings and Disposals to the Third Sector,

Voluntary and Community Groups was adopted by Cabinet on 13 December 2016.

When considering the giving of financial assistance, the council must ensure that it is not giving an unlawful subsidy under the Subsidy Control Act 2022 (the Act).

One of the requirements for a subsidy to be present is for financial assistance being given to an 'enterprise' which is defined in the Act as a person (including all legal entities) who is engaged in an economic activity that entails offering goods or services on a market. The Saracens Football Club do not carry out such economic activity as the clubs' primary activities are non-economic (they charge nominal fees and offer free sessions for local children).

Signed off by: One Legal: legalservices@onelegal.org.uk

1.3. Environmental and climate change implications

There are no direct climate change implications arising from this report, but Saracens Football Club supports the environment through cutting grass and hedges, weeding around the ground and supporting regular litter picks to create a better environment for wildlife.

Please see appendix 3 for more details.

Signed off by: Maizy McCann, Climate Officer, Maizy.mccann@cheltenham.gov.uk

1.4. Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Quality homes, safe and strong communities
- Reducing inequalities, supporting better outcomes

1.5. Equality, Diversity and Inclusion Implications

There are no direct equality implications from the recommendations, though the organisation will continue to promote equality and diversity in line with its own equality policies.

1.6. Performance management – monitoring and review

The council will put in place a monitoring process whereby recipients of a rent support grant will submit a monitoring form to explain the activities that have been delivered from the premises.

The quality and timeliness of previous monitoring information will be taken into account, if the applicant wishes to re-apply for a rent support grant at the end of the

eighteen month period.

2. Background

1.1 As part of Cheltenham Borough Council's wider ambitions to support a thriving voluntary and community sector, the council enables VCS groups to rent its properties through offering a rent support grant scheme.

1.2 We know that appropriate rent support to community-based organisations and services can support the viability of such organisations and the services they provide to the benefit of the social and economic well-being of the town. However, the Council will continue to encourage voluntary and community sector organisations to become more self-sufficient and less reliant upon financial support from the Council.

1.3 A revised rent support grant process was adopted by the council in December 2016. This is based on assessing an application against the following four outcomes:

- Cheltenham's environmental quality and heritage is protected, maintained and enhanced
- Sustain and grow Cheltenham's economic and cultural vitality
- People live in strong and safe communities
- We will work to strengthen the emotional and physical wellbeing of all Cheltenham residents

1.4 The maximum rent support grant that any organisation will be able to apply for will be 80% of their current market rent and that the assessment process will determine the level of grant to be offered up to this maximum and will be staggered incrementally, as follows:

- Meeting one outcome –up to 20% grant
- Meeting two outcomes –up to 40% grant
- Meeting three outcomes –up to 60% grant
- Meeting four outcomes –up to 80% grant

1.5 Each outcome is subject to a stepped discount between 0 and 20% depending upon the impact of the defined sub-elements of each outcome.

1.6 Cabinet retains the discretion to award a further grant of 10%, bringing the maximum rent support grant that any organisation could receive to 90%. This will only be in exceptional cases and any such decision will only be taken after detailed consideration of the organisation's financial and business case for the rent support.

1.7 In addition, the council will scrutinise the applicant's financial standing and make an assessment of the following:

- That the reason for applying for the rent support grant is backed up by the organisation's financial health in that the grant award will support the financial viability of the operation of the building
- That the organisation has reasonable longer-term plans in place to be able to sustain activities being delivered from the building beyond the term of the grant.

1.8 The offer of a grant will be for a maximum of 18 months (to tie in with the next rent review) that will be reviewed at the end of the 12 month period to ensure that the applicant continues to deliver the activities set out in the original application. The council reserves the right to either review the grant amount awarded or withdraw it completely if there are changes to the activities being delivered. In addition, if the organisation is in debt arrears to the council; the grant will be withdrawn.

3. Reasons for recommendations

3.1. The submission from Saracens Football Club has been assessed against the criteria detailed in 1.3.

3.2. Saracens Football Club demonstrated evidence of their contribution to all of the themes assessed against, but particularly in terms of enabling people to live in safe and strong communities through being volunteer led and providing a football club at the heart of the community which brings people together and also provides free football sessions for local children. The club also makes a significant contribution in strengthening the emotional and physical wellbeing of residents thought providing football to age groups from children to over 60s. **Please see appendix 3** for the assessment of their submission.

4. Alternative options considered

4.1. None

5. Consultation and feedback

5.1. None

6. Key risks

6.1. If the Council is overly generous in subsidising tenancies with grants, this will result in reduced income from assets and cumulative impacts on the Council's medium term financial strategy.

6.2. If appropriate and transparent grant agreements are not put in place, tenants may be more difficult to remove if they fail to meet the terms of any subsidised letting arrangement, with the potential for associated adverse publicity for the Council.

6.3. If prospective tenants cannot demonstrate a robust business plan when taking on property commitments from the Council, there is an increased risk of failure and associated financial and reputation impacts for the authority.

Report author:

Helen Down, Participation and Engagement Team Leader,
helen.down@cheltenham.gov.uk

Appendices:

i. Risk Assessment
ii. Equality Impact Assessment
iii. Saracens Football Club Assessment

Background information:

Report to Cabinet 13 December 2016 "Award of rent support grants to Cheltenham's Voluntary and Community Sector Organisations"

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If appropriate and transparent grant agreements are not put in place, tenants may not understand the consequences if they fail to meet the terms of any subsidised letting arrangement.	Helen Down	2	2	4	Accept	Rent support grant agreement to be put in place, in conjunction with One Legal	Helen Down	December 2025
	If prospective tenants cannot demonstrate a robust business plan when taking on property commitments from the Council, there is an increased risk of failure and associated financial and reputation impacts for the authority.	Jon Whitlock	2	3	6	Accept			
	If the grant expires or is terminated, tenants will remain responsible for payment of rent at market value. This may result in an increase in arrears.	Jon Whitlock	2	2	4	Accept			

This page is intentionally left blank

Appendix 2: Equality Impact Assessment (Screening)

to be included in all Cabinet and Council reports

1. Identify the policy, project, function or service change

a. Person responsible for this Equality Impact Assessment	
Officer responsible: Helen Down	Service Area: Communities, Wellbeing and Partnerships
Title: Participation and Engagement Team Leader	Date of assessment: 22.10.25
Signature: H Down	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
Policy for Property Lettings and Disposals to the Third Sector, Voluntary and Community Groups	
Is this new or existing?	**Already exists and is being reviewed**
Please specify reason for change or development of policy, function, strategy, service change or project	
A grant is being made to a new organisation under the rent support policy agreed in December 2016.	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	A fit for purpose property portfolio which drives delivery of our corporate vision and outcomes.

Objectives:	1. To use our assets to sustain and grow Cheltenham's economic and cultural vitality and make a positive contribution to people's lives. 2. To maintain a 'fit for purpose' property portfolio to support service delivery 3. To make a positive contribution to the Council's financial position.
Outcomes:	Provision of a rent support grant to Saracens Football Club to support the financial viability of the operation of the site.
Benefits:	Supporting the financial viability of Saracens Football Club.

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**No**
Do you expect the impacts to be positive or negative?	**No impact expected**
Please provide an explanation for your answer:	
Saracens Football Club has been running the site for a number of years, but the provision of the rent support grant to help them to cover the market value rent will support their financial viability.	

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate	
Stage Two required	**No**
Owner of Stage Two assessment	
Completion date for Stage Two assessment	

Please move on to Stage 2 if required (intranet link).

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

Cheltenham Borough Council

Cabinet - 18 November 2025

Updated Safeguarding Policy

Accountable member:

Councillor Victoria Atherstone, Cabinet Member Safety and Communities

Accountable officer:

Claire Hughes, Director of Governance, Housing and Communities

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

The Council's safeguarding policy which was last adopted in December 2023, has been reviewed and amended to take into account that the Council's Housing Services, which were formerly provided by Cheltenham Borough Homes, have now been brought back in-house.

The opportunity was also taken to update the policy in the light of best practice and to better reflect the strategic framework for safeguarding in Gloucestershire.

The safeguarding policy continues to cover both children and vulnerable adults as well as the Council's wider community safeguarding duties.

Recommendations: That Cabinet:

1. **adopts the updated safeguarding policy;**

2. **delegates authority to the Director of Governance, Housing and Communities, in consultation with the Cabinet Member Safety and Communities and One Legal, to amend the commissioning and**

procurement section of the safeguarding policy once the relevant Gloucestershire Safeguarding Children Partnership guidance and training becomes available.

---

1. Implications

1.1 Financial, Property and Asset implications

There are no direct financial, property or asset implications from the recommendations set out in the report.

Signed off by: Ela Jankowska – Finance Business Partner

Date: 01.10.2025

1.2 Legal implications

The relevant legal provisions are contained within the policy. The authority has various legal duties in respect of safeguarding and the policy seeks to provide guidance on how the authority will exercise those duties and functions.

Signed off by: One Legal, legalservices@onelegal.net.uk

Date:26.09.2025

1.3 Environmental and climate change implications

None arising directly a result of this report

Signed off by: Maizy McCann, Climate Officer, Maizy.mccann@cheltenham.gov.uk

Date:29.9.2025

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Quality homes, safe and strong communities
- Reducing inequalities, supporting better outcomes

1.5 Equality, Diversity and Inclusion Implications

The Council's safeguarding policy, and the training associated with it, follows good practice guidance from Gloucestershire Safeguarding Children Partnership and Gloucestershire Safeguarding Adult Board. The training and associated guidance addresses issues including race, culture, disability, sexuality, gender, religion and age ensuring the Council applies the policy without prejudice or discrimination. By

its nature the policy supports the Council in its public sector equality duty by ensuring Council services are safe for all its communities.

---

2 Background

2.1 Cheltenham Borough Council's staff and elected members have always held a strong commitment to safeguarding children, vulnerable adults, and the wider community. The Council's current safeguarding policy was adopted in December 2023 before housing services transitioned back into the Council. It was therefore necessary to amend the policy to ensure it supported safeguarding across the full range of Council services.

2.2 Since the safeguarding policy's adoption there have also been some developments in both strategy and practice in safeguarding. The updated policy takes these into account as outlined in this report.

3 Safeguarding policy amendments

3.1 The main structure of the policy is consistent with current best practice so has remained the same, however the following changes have been made.

3.2 Additional information has been added to the policy setting it in the current strategic framework of safeguarding in Gloucestershire. This includes descriptions of the roles of the Gloucestershire Safeguarding Children's Partnership (GSCP) and the Gloucestershire Safeguarding Adults Board (GSAB) as well as the overarching strategies Make Every Adult Matter and the Gloucestershire One Plan for children and young people.

3.3 The policy has been updated to include relevant housing personnel within the roles section, as well as the procedures and protocols. This not only creates one set of procedures for all council staff, it also provides additional resilience to the Council's safeguarding approach.

3.4 To ensure that there is effective governance over the implementation of the updated policy, and to ensure that there is consistency of practice across the organisation, the roles and responsibilities section has been amended to include the establishment of a Corporate Safeguarding Group. The group will consist of the key officers responsible for safeguarding, as well as representatives from across council services. This will allow discussion of concerns, dissemination of best practice and additional support for staff. The group will also contribute to the annual safeguarding self-assessment audits required of the Council.

3.5 The policy contains reference to specific Council service areas that, due to their nature or legislative framework, have specific safeguarding requirements.

Housing has now been added to this section and all relevant housing policies are expected to align to the safeguarding policy and cross reference the policy as appropriate.

3.6 Council service areas that use images of children and young people in promotional materials already seek parental consent to do so, however specific guidance on using images of children was not included in the previous iteration of the policy.

3.7 With an increased use of technology, including for enforcement purposes, there is a need for a corporate approach to the use of images in regard to safeguarding. The policy covers images taken with parental consent such as at events, as well as images taken where parental consent has not been obtained such as in the use of CCTV in community safety operations.

3.8 As part of the GSCP's review of its own procedures, all organisations were asked to strengthen their response to both making and receiving an escalation of a professional disagreement. Accordingly, the policy now includes specific reference to receiving an escalation in relation to Council services and outlines the staff that should be involved at each stage.

3.9 The commissioning and procurement section has remained the same, however the GSCP's Section 11 report has highlighted commissioning as an area of development across the partnership. The GSCP is therefore in the process of developing best practice guidance and training in this area. Once Council officers have reviewed the guidance and received the training, this section will be reviewed to ensure it is aligned to the guidance.

4 Reasons for recommendations

4.1 Although the current safeguarding policy was not due for review until the end of 2026, the integration of housing services into the Council has prompted the need for an earlier review. This ensures that all Council services are following the same standards of practice and procedures.

4.2 Although commissioning and procurement was raised by the GSCP as an area of development within the partnership, the Council's policy already contains sections related to these functions. Until the GSCP publishes further best practice guidance it does not seem prudent to review this section at this stage.

4.3 The guidance, once released, is likely to only result in minor changes, so will be dealt with under delegated authority.

5 Alternative Options considered

7.1 The alternative to the recommendations would be to continue to have two

separate but aligned policies for housing and non-housing services. This would create the possibility of residents receiving different safeguarding responses. It also does not maximise the opportunity of increasing resilience in the safeguarding response by having a single policy and does not capitalise on the expertise present across the Council.

6 Consultation

8.1 Consultation on the policies have taken place with the Council's Human Resources team, One Legal, the Council's prevent lead and officers within Housing. Best practice has also been discussed with representatives of other district councils via the GSCP and GSAB district subgroup. Their feedback has been incorporated in the relevant sections.

7 Risks

7.1 Safeguarding is a statutory duty of Cheltenham Borough Council. Failure to have a safeguarding policy that covers all Council services could mean inconsistencies of practice across Council departments. This would mean that the Council was not fulfilling its statutory duties effectively. If the policy is not fully implemented across the Council it could also put children, vulnerable adults and the wider community who use Council services at risk of harm.

Report author:

Tracy Brown Safeguarding and Partnership Manager
tracy.brown@cheltenham.gov.uk

Amanda Wray Safeguarding, Equality and Diversity Manager
amanda.wray@cheltenham.gov.uk

Appendices:

i. Risk Assessment
ii. Equality Impact Assessment – Screening
iii. Safeguarding Policy

Background information:

N/A

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If the Council fails to engage fully with the safeguarding agenda the Council may not meet its statutory duties.	Claire Hughes	4	2	8	Reduce	Adoption and roll out of updated safeguarding policy	Tracy Brown Amanda Wray	
	If service areas fail to engage with the safeguarding agenda fully there may be a failure to safeguard a child or vulnerable adult in our care	Claire Hughes	4	2	8	Reduce	Roll out of training to all staff and elected members, deputy designated officers identified and trained. Communications plan Establishment of a corporate safeguarding team	Tracy Brown Amanda Wray	
	If services commissioned by the council do not meet the safeguarding standards required, the council may not meet its statutory duties and a	Claire Hughes	4	2	8	Reduce	Adoption of the policy and training for relevant staff Continue to seek confirmation that commissioned	Tracy Brown Amanda Wray	

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	child or vulnerable adult may not be effectively safeguarded						services have safeguarding policies in place via the annual assurance certificate		

STAGE 1 – Equality Screening

1. Identify the policy, project, function or service change

a. Person responsible for this EqIA	
Officer responsible: Amanda Wray	Service Area: Safeguarding
Title: CBC Housing Safeguarding and Equality Diversity and Inclusion manager	Date of assessment: 10/10/2025
Signature:	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
CBC Safeguarding Policy	
Is this new or existing?	**Already exists and is being reviewed**
Please specify reason for change or development of policy, function, strategy, service change or project	
Policy has been reviewed as part of a wider service improvement and expansion and in line with the consumer standards requirement.	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Purpose:	The purpose of the updated Safeguarding Policy is to set out a clear and consistent approach to safeguarding across all Council services. It ensures that employees, elected members, volunteers, contractors, and commissioned providers understand their responsibilities and act appropriately to protect those at risk.
Aims:	The aims of the updated Safeguarding Policy are as follows: Raise overall awareness of safeguarding, the signs of abuse and information on what to do if any form of abuse is identified or suspected. Protect children and vulnerable adults from harm while using services that the Council is responsible for (both directly provided and commissioned) by ensuring services have safe working practices in place. Promote early prevention, health, wellbeing, and human rights, enabling children and vulnerable adults to live safely and free from harm. To empower individuals and enable them to make decisions about their living environment and support needs while respecting their rights, dignity, and independence.

	Ensure that employees, casual workers, volunteers, and elected members associated with Cheltenham Borough Council can report any safeguarding concerns appropriately. Ensure employees, casual workers, volunteers, and elected members have effective training and support to allow them to safeguard children and vulnerable adults. Fulfil the council's statutory responsibilities and duty of care, including cooperation with relevant authorities and safeguarding partners. Support the council's broader commitment to reducing inequalities within the borough by ensuring that safeguarding is central to community and housing services.
Outcomes:	The outcomes of the updated safeguarding policy are as follows: • Council elected members, staff, volunteers understand their roles and responsibilities in safeguarding. • Council elected members, staff, volunteers know how to recognise signs of abuse and how to respond appropriately. • To ensure that individuals who come into contact with Council services are safe from abuse, neglect, and exploitation. • To promote a culture of vigilance and early intervention in relation to safeguarding.
Who benefits:	The updated policy will benefit the following: • Council elected members, staff, volunteers • Individuals who come into contact with Council services • Tenants of the Council • The wider community of Cheltenham

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Positive**

Please provide an explanation for your answer:

The updated safeguarding policy will have the following impacts on people:

- Children, young people, and adults who are at risk are protected from abuse, neglect, exploitation, and harm.
- Increased awareness and training for elected members, staff, volunteers on safeguarding.
- Better coordination between council teams to support people with complex needs.
- Encourages a culture of vigilance and responsibility across all community services.
- Ensures consistent, joined-up responses to safeguarding concerns.
- Clarifies roles and responsibilities for staff, volunteers, and partners in relation to safeguarding.

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate	
Stage Two required	Yes
Owner of Stage Two assessment	Tracy Brown / Amanda Wray
Completion date for Stage Two assessment	21/10/25

STAGE 2 – Full Equality Impact Assessment

2. Engagement and consultation

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

a. Research and evidence

List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.

The Council has engaged with wide range of groups to help shape the updated safeguarding policy.

Internal staff consultation

- Housing Officers and Managers: To understand safeguarding concerns arising in tenancy management, homelessness, and supported housing.
- Community Services Teams: To gather insights on vulnerable groups and safeguarding risks in public spaces and events.
- Safeguarding Leads: To ensure alignment with statutory duties and best practice.

Community Engagement

- Public Surveys or Focus Groups: Targeting residents, especially those from vulnerable or underrepresented groups (e.g. older adults, disabled people, ethnic minorities).
- Tenant Forums and Housing Associations: To gather feedback from social housing tenants and those with lived experience of safeguarding issues.
- Youth Councils or Schools: To include the voices of children and young people in shaping safeguarding priorities.

Partnership Consultation

- Gloucestershire Safeguarding Children Partnership (GSCP) and Safeguarding Adults Board: To ensure consistency with county-wide safeguarding strategies.
- Police, NHS, and Mental Health Services: To align with multi-agency safeguarding protocols.
- Voluntary and Community Sector (VCS): Including domestic abuse charities, refugee support groups, and LGBTQ+ organisations.

In addition, the council has reviewed data and evidence including:

- Safeguarding referral data
- Housing complaints and tenancy breaches

- Community safety reports

b. Consultation	
Has any consultation been conducted?	**Yes**

Describe the consultation or engagement you have conducted or are intending to conduct.
Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.
If no consultation or engagement is planned, please explain why.

Consultation and Ongoing Engagement

In addition to formal consultations with internal teams and community stakeholders as set out above, ongoing engagement is maintained through participation in a range of multi-agency partnership boards. These include:

- Gloucestershire Safeguarding Adults Board (GSAB)
- Fire Safety Development Group
- Gloucestershire Safeguarding Children's Partnership Board
- LGBTQ+ Partnership Board
- Mental Health and Wellbeing Partnership Board
- Learning Disabilities Partnership Board

Regular attendance at these boards enables the council to stay up to date with emerging safeguarding policies, procedures, and best practices. More importantly, it provides a platform to hear and reflect on the lived experiences of individuals from diverse and marginalised communities.

This insight is vital in shaping how the council responds to the safeguarding needs of vulnerable groups across housing, community services, and wider council functions.

This collaborative approach ensures that the policy remains responsive, inclusive, and aligned with individual specific needs, particularly in areas such as tenancy support, homelessness prevention, mental health, and equality.

3. Assessment

a. Assessment of impacts

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Positive and negative	• Protects vulnerable older adults from abuse, neglect, and exploitation. • Promotes age-appropriate safeguarding responses and services. • But risks of barriers to reporting concerns – such as sensory, dementia, lack of awareness of safeguarding issues.	• Ensure older adults who may may face barriers in accessing digital reporting have other options – such as tenancy management and Housing Support officer engagement. • Raise awareness in hubs and sheltered schemes by providing sessions that explore and advise around specific safeguarding issues for older people.
	Younger People (16-25)	Positive	• Protects children and young people from abuse, neglect, and exploitation. • Promotes age-appropriate safeguarding responses and services.	
	Children (0-16)	Positive	• Protects children and young people from abuse, neglect, and exploitation. • Promotes age-appropriate safeguarding responses and services.	
DISABILITY A definition of disability under the Equality Act 2010 is available here. *See also carer responsibilities under other considerations.*	Physical disability	Positive and negative	• Recognises vulnerability of people with physical disabilities. • Encourages accessible safeguarding procedures and communication methods. • Policy includes safeguarding for adults with care and support needs, which often includes those with physical or learning disabilities. • Recognition of discriminatory abuse and institutional abuse. • Risk of underreporting due to communication barriers or lack of accessible reporting tools.	Offer safeguarding reporting through: • Phone (including text relay services) • Email • Online forms (with screen reader compatibility) • In-person at council offices or community hubs • Ensure these are clearly advertised and easy to access.
	Sensory Impairment (sight, hearing)	Positive and negative	• Recognises vulnerability of people with sensory disabilities. • Encourages accessible safeguarding procedures and communication methods. • Risk of underreporting due to communication barriers or lack of accessible reporting tools.	• Make available accessible formats for reporting: Easy Read version, Braille, British Sign Language.

	Mental health	Positive and negative	• Recognises vulnerability of people with mental health disabilities. • Encourages accessible safeguarding procedures and communication methods. • Good partnership working with Mental Health services. • Risk of underreporting due to communication barriers or lack of accessible reporting tools.	Continue to strengthen relationships with Mental Health services and Health professionals.
	Learning Disability	Positive and negative	• Recognises vulnerability of people with learning disabilities. • Encourages accessible safeguarding procedures and communication methods. • Risk of underreporting due to communication barriers or lack of accessible reporting tools.	Engage with Community investment, CBC Employment and Life skills team and Building circles project to encourage reporting.
GENDER REASSIGNMENT		Neutral	• No foreseen differential impact on people who are changing genders	Having clear information and procedures in place regarding Hate Crime and Hate incidents, including guidance and suppo options.
MARRIAGE & CIVIL PARTNERSHIP	Women	Positive and negative	• Supports individuals experiencing domestic abuse within any legal partnership. • Providing different formats in which to report a safeguarding concern • But there is a risk that safeguarding risks in non-traditional or informal relationships are over-looked	Bring an updated domestic abuse policy Cabinet for approval
	Men	Positive and negative	• Supports individuals experiencing domestic abuse within any legal partnership. • Providing different formats in which to report a safeguarding concern • But there is a risk that safeguarding risks in non-traditional or informal relationships are over-looked	Bring an updated domestic abuse policy to Cabinet for approval .
	Lesbians	Positive and negative	• Positive Impacts: • Supports individuals experiencing domestic abuse within any legal partnership.	Bring an updated domestic abuse policy to Cabinet for approval .

			• But there is a risk that safeguarding risks in non-traditional or informal relationships are over-looked	
	Gay Men	Positive and negative	• Supports individuals experiencing domestic abuse within any legal partnership. • Providing different formats in which to report a safeguarding concern • But there is a risk that safeguarding risks in non-traditional or informal relationships are over-looked	Bring an updated domestic abuse policy to Cabinet for approval
PREGNANCY & MATERNITY	Women	Positive	• Safeguarding procedures include unborn children in child protection concerns. • Staff are advised to consider risks to pregnant individuals in domestic abuse disclosures.	Bring an updated domestic abuse policy to Cabinet for approval
RACE* Further information on the breakdown below each of these headings, is available here. For example Asian, includes Chinese, Pakistani and Indian etc	White	Positive and negative	• Recognition of discriminatory abuse including racism and culturally motivated harm (e.g., honour-based violence, FGM, forced marriage). • Requirement for partner organisations to align with CBC safeguarding standards. • But recognising language barriers or culturally sensitive safeguarding approaches. • Plus risk of under-reporting in communities with mistrust of statutory services.	• Engagement with tenants and tenant panels to understand lived experience. • Engagement with tenant voice and panels to understand the gaps in services. • Use analysis and data to explore and evidence barriers experienced by different ethnic groups. • Work with Customer complaints to address areas of concern.
	Mixed or multiple ethnic groups	Positive and negative	See above	See above
	Asian	Positive and negative	See above	See above
	African	Positive and negative	See above	See above
	Caribbean or Black	Positive and negative	See above	See above
		Choose an item.		
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Positive	• Policy acknowledges abuse linked to cultural or religious practices (e.g., HBV, FGM, forced marriage).	

			• Discriminatory abuse includes faith-based harassment.	
SEX (GENDER)	Men	Positive	• Recognition of safeguarding risks faced by men (e.g., male victims of domestic abuse or sexual exploitation).	
	Women	Positive	• Strong focus on domestic abuse, coercive control, and sexual violence—issues disproportionately affecting women. • Recognition of gender-specific safeguarding risks (e.g., FGM, forced marriage.	
	Trans Men	Positive	• The policy's inclusive language and recognition of discriminatory abuse supports trans individuals.	
	Trans Women	Positive	• The policy's inclusive language and recognition of discriminatory abuse supports trans individuals.	
SEXUAL ORIENTATION	Heterosexual	Positive	• Safeguarding champions and elected members are expected to promote inclusive practice.	
	Lesbian	Positive	See above	
	Gay	Positive	See above	
	Bisexual/Pansexual	Positive	See above	
Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Choose an item.		
Rurality i.e. access to services; transport; education; employment; broadband		Choose an item.		
Other (e.g. caring responsibilities)		Choose an item.		

* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available here

4. Outcomes, Action and Public Reporting

a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer
• Ensure older adults who may may face barriers in accessing digital reporting have other options – such as tenancy management and Housing Support officer engagement. • Raise awareness in hubs and sheltered schemes by providing sessions that explore and advise around specific safeguarding issues for older people	**March 2026**	**Amanda Wray**
Offer safeguarding reporting through: • Phone (including text relay services) • Email • Online forms (with screen reader compatibility) • In-person at council offices or community hubs • Ensure these are clearly advertised and easy to access. • Make available accessible formats for reporting: Easy Read version, Braille, British Sign Language**.**	**March 2026**	**Amanda Wray**
Bring an updated domestic abuse policy to Cabinet for approval	**Jan 2026**	**Tracy Brown**
• Engagement with tenants and tenant panels to understand lived experience. • Engagement with tenant voice and panels to understand the gaps in services. • Use analysis and data to explore and evidence barriers experienced by different ethnic groups. • Work with customer complaints to address areas of concern.	**March 2026**	**Amanda Wray**

b. Public reporting

All completed EqIA's are required to be publicly available on the Council's website once they have been signed off. EqIA's are also published with the papers for committee and full council decisions.

Please send completed EqIA's to [email address]

5. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

6. Change log

Name	Date	Version	Change

This page is intentionally left blank

Cheltenham Borough Council Safeguarding Policy 2025

Version control

Document name: document name

Version: 1.0

Responsible officer

- Tracy Brown Safeguarding and Partnerships Manager
- Amanda Wray Safeguarding Equalities and Diversity Manager

Approved by:

Next review date: October 2028

Retention period:

Revision history

Revision date	Version	Description
Date	V1	

Consultees

Internal

- Cabinet Member

External

- Gloucestershire Safeguarding Partnership

Distribution

CHELTENHAM
BOROUGH COUNCIL

Contents

Introduction and purpose of the policy 4
Aims and scope of the policy 5
Safeguarding Children 5
Safeguarding Vulnerable Adults 6
Wider community safeguarding responsibilities 6
Gloucestershire's Overarching Strategy 7
Responsibilities and Governance 8
Designated Senior Leaders 8
Designated Safeguarding Officers 8
Elected Member Safeguarding and Domestic Abuse Advocates 8
Leadership Team 8
Service Managers 9
Human Resources 9
Elected Members 10
Corporate Safeguarding group 10
Who does this policy affect? 10
Housing Services 10
Contractors 11
Commissioned Services 11
Procurement 11
Partners 12
Volunteers 12
Apprentices, Work Experience and Workers under the age of 18 12
Licensing 12
Safety Advisory Group 13
Council owned commercial buildings 13
Safeguarding Practice 13
Safer Recruitment 13
Training 13
Prevent training 14

Safeguarding Allegations against a Member of Staff, Volunteer or Elected Member 14
Support for Staff/Volunteers 14
Information Sharing 15
Retention of Safeguarding records 16
Images of children 16
Safeguarding Procedures 17
Listening to Children and Vulnerable Adults 17
What to do if you have concerns 17
Dealing with Allegations Against Staff 18
Maintain Confidentiality 18
Support 18
Allegations of historic abuse 18
How do I report a concern? 18
Children 19
Vulnerable Adults 19
Information for social services or the police about suspected abuse: 19
Stalking 19
Radicalisation 19
Modern Slavery/Human Trafficking 19
Domestic Abuse 19
Once you have reported the concern 21
Escalation of professional disagreements 21
Concern about an employee, casual worker, volunteer, or elected member working with children or vulnerable adults 32
An employee, casual worker, volunteer, or elected member at Cheltenham Borough Council has concerns about a vulnerable child 33
An employee, casual worker, volunteer, or elected member at Cheltenham Borough Council has concerns about a vulnerable adult 34

Introduction and purpose of the policy

Our Commitment to Safeguarding

The Council is committed to ensuring that everyone in our community—regardless of age, background, or circumstance—can live safely and free from abuse, neglect, and exploitation.

Safeguarding is about protecting children, young people, and vulnerable adults from harm. It also includes promoting early intervention, supporting health and wellbeing, and upholding human rights.

This policy sets out a clear and consistent approach to safeguarding across all Council services. It ensures that employees, elected members, volunteers, contractors, and commissioned providers understand their responsibilities and act appropriately to protect those at risk.

We recognise that safeguarding is not a standalone activity. It must be embedded across all areas of the Council's work and reflected in everything we do.

As a local authority, we have both a statutory responsibility and a duty of care to report safeguarding concerns and to work in partnership with relevant agencies to protect our residents.

Our longstanding commitment to reducing inequalities within the borough strengthens our resolve to safeguard those who may be vulnerable, ensuring that Cheltenham remains a safe and supportive place for all.

The safeguarding of children and young people and the safeguarding of vulnerable adults encompasses the following types of harm:

- Child Abuse (physical, sexual, emotional and neglect)
- Vulnerable adult abuse (physical, sexual abuse, psychological, financial, neglect and acts of omission, discriminatory, institutional abuse)
- Domestic Abuse (including coercive control)
- Stalking
- Sexual Violence
- Child Exploitation (sexual and criminal)
- Modern Slavery
- Honour Based Violence
- Forced Marriage
- Female Genital Mutilation
- Cybercrime including cyber bullying
- Radicalisation
- Self-neglect (including hoarding)

This policy outlines our approach to safeguarding, the responsibilities of our staff and partners, and the procedures in place to respond to concerns.

It reflects our commitment to working collaboratively with local safeguarding partnerships, including the Gloucestershire Safeguarding Children Partnership and

the Gloucestershire Multi-Agency Safeguarding Adults Board, to ensure a consistent and effective response to safeguarding across the borough.

Aims and scope of the policy

The aims of the policy are to:

Raise overall awareness of safeguarding, the signs of abuse and information on what to do if any form of abuse is identified or suspected.

Protect children and vulnerable adults from harm while using services that the Council is responsible for (both directly provided and commissioned) by ensuring services have safe working practices in place.

Promote early prevention, health, wellbeing, and human rights, enabling children and vulnerable adults to live safely and free from harm.

To empower individuals and enable them to make decisions about their living environment and support needs while respecting their rights, dignity, and independence.

Ensure that employees, casual workers, volunteers, and elected members associated with Cheltenham Borough Council can report any safeguarding concerns appropriately.

Ensure employees, casual workers, volunteers, and elected members have effective training and support to allow them to safeguard children and vulnerable adults.

Fulfil the council's statutory responsibilities and duty of care, including cooperation with relevant authorities and safeguarding partners.

Support the council's broader commitment to reducing inequalities within the borough by ensuring that safeguarding is central to community and housing services.

Safeguarding Children

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

Under **Section 11** of the Children Act 2004, safeguarding is defined as the **duty of key agencies**—including local authorities, police, and health services—to:

"*Ensure that their functions are discharged having regard to the need to safeguard and promote the welfare of children*"

This duty applies whenever these agencies carry out functions that may affect children, and it has been extended to other bodies such as schools through additional legislation.

In accordance with guidance provided by Working Together to Safeguard Children 2018 and based on the Children Act (1989) and (2004) the terms children, child, young person or young people shall for the purposes of this policy be deemed to mean:

"*Anyone who has not yet reached their 18th birthday. The fact that they have reached 16 years of age; are living independently or in further education; are a member of the armed forces; in hospital or in custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection under the Acts and this policy*".

Safeguarding Vulnerable Adults

The Council's role for safeguarding vulnerable adults is governed by the Care Act 2014 and the responsibilities apply to adults who:

- Have care and support needs.
- Are experiencing or are at risk of abuse or neglect.
- Are unable to protect themselves from either the risk of, or the experience of abuse or neglect.

A vulnerable adult is any person aged 18 or over, who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs and:
- Is experiencing or at risk of abuse or neglect and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

Wider community safeguarding responsibilities

In addition to the above specific safeguarding legislation the Council also has statutory duties related to safeguarding under the following legislation:

Crime and Disorder Act 1998 includes the requirement to establish a Community Safety Partnership that have statutory duties to formulate and implement strategies to reduce crime, disorder, antisocial behaviour, and substance misuse and share information between agencies to support safeguarding and crime prevention.

The Domestic Abuse Act 2021 makes the Council along with other named organisations responsible for Domestic Abuse Related Death Reviews (DARDRs) formerly Domestic Homicide Reviews. This covers both the commissioning, publication, and implementation of the reviews. This includes statutory responsibilities relating to housing support for victims.

Under the Police, Crime, Sentencing, and Courts Act 2022 the Council is a specified authority with a duty to prevent and reduce serious violence. This includes youth violence and criminal exploitation.

To support the Council to fulfil its duties under the legislation Council officers are members of various countywide partnerships related to the safeguarding of children, vulnerable adults, and the prevention of crime. More details can be found in appendix 1.

As part of our commitment to county-wide working, the Council completes an annual audit of its safeguarding processes which is known as the section 11 audit.

Gloucestershire's Overarching Safeguarding Approach

Gloucestershire Safeguarding Adults Board (GSAB)

The Gloucestershire Safeguarding Adults Board (GSAB) is a statutory partnership established to safeguard and promote the welfare of adults at risk within the county, enabling them to maintain their independence, well-being, and personal choice. GSAB is responsible for developing policies, providing training and guidance under legislation such as the Mental Capacity Act (2005) and Deprivation of Liberty Safeguards (DoLS), reviewing safeguarding procedures, and promoting awareness within communities.

Make Every Adult Matter (MEAM)

The "Every Adult Matters" approach in Gloucestershire's safeguarding framework is not a standalone policy but rather a guiding ethos embedded within the county's broader safeguarding strategy. It reflects a commitment to ensuring that every adult—regardless of background, ability, or circumstance—is protected from harm, abuse, neglect, and exploitation, and is supported to live a life of dignity, safety, and respect.

Gloucestershire Safeguarding Children Partnership (GSCP)

The Gloucestershire Safeguarding Children Partnership is a statutory multi-agency body tasked with overseeing and coordinating arrangements to safeguard and promote the welfare of all children and young people in Gloucestershire. The GSCP is responsible for disseminating lessons learned, monitoring the impact of safeguarding practices, and driving improvements in professional standards and inter-agency working across Gloucestershire.

One Plan for Children and Young People

The Gloucestershire One Plan is a strategic framework designed to unify and coordinate efforts across agencies to improve outcomes for children and young people in the county. It is a county-wide plan that integrates safeguarding into broader health, wellbeing, and social care priorities.

The One Plan for Children and Young People in Gloucestershire (2024–2030) is a collaborative strategy led by the Children and Young People's Coalition Board.

Responsibilities for safeguarding

All staff and elected members must ensure that they are aware of the safeguarding procedures in place within the authority and which staff and members have a specific responsibility for safeguarding issues. All staff and elected members will receive safeguarding information at induction.

Designated Senior Leaders

Cheltenham Borough Council has two Senior Leaders (one officer and one cabinet member) responsible for safeguarding.

They are overall responsible for ensuring that the Council fulfils its safeguarding responsibilities:

Senior Officer Lead – Claire Hughes, Director of Governance, Housing and Communities

Cabinet Member Lead – Councillor Victoria Atherstone, Cabinet Member for Communities and Safety

Designated Safeguarding Officers

Their role is to support staff and elected members and provide guidance and advice to aid implementation of this policy and in making a referral. They will also support the Safeguarding Champions and Leadership team to fulfil their roles.

Designated Safeguarding Officer (non-housing) – Tracy Brown, Safeguarding and Partnerships Manager

Designated Safeguarding Officer (housing) – Amanda Wray, Safeguarding, Equality and Diversity and Inclusion Manager

Deputy Designated Officer (HR) Shona Lovett, HR Manager

Elected Member Safeguarding and Domestic Abuse Advocates

Elected member safeguarding champions are responsible for championing the importance of safeguarding and promoting the welfare of children, young people and vulnerable adults. They are nominated by full council and are normally cross-party.

Safeguarding and Domestic Abuse Advocates – Cllr Jackie Chelin, Cllr Tabi Joy, Cllr Helen Pemberton and Cllr Victoria Atherstone

Leadership Team

Cheltenham Borough Council's Leadership Team will ensure that:

1. The Council meets its legal obligations.
2. Where applicable, the safeguarding of children, young people and vulnerable adults is considered in strategies, plans and services.

3. The best safeguarding practices are embedded and maintained across all services to ensure continuous improvement and compliance with national and local policies.
4. All safeguarding matters relating to safeguarding are expedited in a timely manner and treated seriously.
5. Support staff and members on all aspects of safeguarding and ensure procedures are adhered to.
6. Appropriate training is facilitated, in particular for frontline employees.

Service Managers

Cheltenham Borough Council's service managers will ensure that:

1. The safeguarding policy is adhered to across the organisation.
2. They and their staff complete and implement the appropriate safeguarding training and that this is reinforced through team meetings and individual 121s etc.
3. Staff responsible for safeguarding are fully supported.
4. They take responsibility for the quality of safeguarding children, young people, and vulnerable adults in their service area.
5. All staff and volunteers working with children, young people and vulnerable adults are subject to the Disclosure and Barring checks appropriate to their role and legislative requirements.
6. Report any concerns as per the policy.

Human Resources

Human Resources will ensure that:

1. The relevant policies are in place e.g., Safer Recruitment and Disciplinary Procedures.
2. Managers are supported in the use of these policies directly and indirectly associated with safeguarding.
3. Provide support with the pre-employment checks (including through the Disclosure and Barring Service).
4. All staff are issued with safeguarding information at induction and support ongoing safeguarding training for all staff.
5. When the safeguarding policy is updated, ensure this is communicated to all staff.

Staff

The safeguarding policy applies to all categories of people working for the Council including those on casual contracts and those who volunteer for the Council.

The Council's Staff will:

1. Treat all safeguarding matters seriously.
2. Report any concerns as per the policy.
3. Be aware of and adhere to the safeguarding policy and referenced policies.
4. Complete safeguarding training relevant to their role covering children, adults and domestic abuse.
5. Maintain and update information on the appropriate reporting system.

The Council's volunteer policy includes a section on safeguarding.

Elected Members

Elected members are uniquely placed to support the safeguarding of children and vulnerable adults within their community. They can also provide effective leadership to ensure that the Council is fulfilling its corporate responsibility. Elected members should always:

1. Report their concerns about a child or vulnerable adult's welfare or someone else's behaviour regarding a child or vulnerable adult as outlined in this policy.
2. Adopt good practice in terms of safeguarding when carrying out their council duties.
3. Seek support or raise concerns with the one of the Designated Safeguarding Officers when necessary.
4. Undertake safeguarding awareness training covering children, adults and domestic abuse.

Corporate Safeguarding Group

The Council has a dedicated Corporate Safeguarding Group that will meet quarterly. The purpose and function of the group is outlined in its Terms of Reference, and includes:

a) Having operational oversight of the safeguarding policy and procedures guide and other matters regarding safeguarding.
b) Being chaired by the Designated Senior Leader.
c) Support the submission of the annual Section 11 report and audit.

Members of the corporate safeguarding group will be part of a dedicated Teams channel and meet quarterly.

It will comprise as a minimum, officers who can represent the following areas, housing, environmental health, licensing, green spaces, community development, Human Resources and training.

Roles and responsibilities for specific services within the organisation

Whilst the Safeguarding Policy applies equally to all Council staff and elected members, there are certain service areas that, due to either the type of service, or the legislative framework have additional duties or requirements.

Housing Services

The Cheltenham Borough Council housing services manage the tenancies associated with the c.4500 residential properties that are owned by the Council and

as such have additional responsibility to support the welfare of children, young people, and adults in our accommodation as the well as the wider community.

Housing services will identify and respond to safeguarding concerns as part of our housing services, including during interactions with neighbourhood and housing teams such as tenancy sign-ups, property maintenance and repair visits, annual audit visits and Community Investment activities.

The team will then work collaboratively with statutory safeguarding partners as part of the case working process. All case work is recorded on the QL reporting system.

This includes specific case work around domestic abuse and anti-social behaviour.

Safeguarding is also referenced in all relevant housing policies.

Contractors

Each year, the Council procures a wide range of external contractors covering a range of areas such as; construction and building services, professional consultancy, environmental services, transport and industrial maintenance.

The Council will ensure that:

1. All contractors providing services directly related to children, young people and vulnerable adults have a safeguarding policy and practices which complement the council's requirements related to safeguarding.
2. Contractors providing a service to the Council (such as maintenance work at a council property) will be made aware of the council's procedures and policies.
3. Council staff will ensure that relevant safeguarding practices are adopted by the contractor.

Commissioned Services

When the Council commissions services to be delivered on its behalf it still retains a duty to ensure that those services comply with relevant statutory safeguarding responsibilities.

The Cheltenham Borough Council lead commissioner for the individual contract will be responsible with the support of the designated safeguarding officer and One Legal to ensure compliance with safeguarding regulations at all stages of the commissioning process. This will include ensuring the safeguarding provisions are integrated into service delivery contracts as well as putting arrangements in place for the regular monitoring of the provider's safeguarding policies and processes.

Leadership Team will keep an overview of all contracts to ensure that the aims of this safeguarding policy are embedded at all times.

Procurement

The Council will ensure that safeguarding is embedded across the procurement process.

Information on procurement can be found here

Partners

All partners working with the Council must have regard to safeguarding. For joint projects, where involving members of the public it would be good practice for partner agencies to pass a copy of their safeguarding policy to the Council to ensure it aligns with the Council's safeguarding requirements or alternatively, where no such policy exists, the partner will be required to adopt this policy for the duration of the project.

Volunteers

All supervisors must ensure that volunteers are aware of, and have received appropriate training in as described in this policy.

Disclosure and Barring Service (DBS) checks will be carried out on any volunteer who in the course of their activity has regular, unsupervised, contact with the same group of children or young people. A DBS check will also need to be carried out on volunteers who care for or deal with the personal affairs of any adult.

Guidance on volunteering can be found here

Apprentices, Work Experience and Workers under the age of 18

Staff will need to be aware that the child safeguarding duty referenced above will apply to their interaction with work experience and modern apprentice workers under the age of 18. Such workers would still be deemed as children under this policy, whilst also themselves being responsible under the duty imposed by Section 11 of the Children Act (2004). It will be necessary to consider the impact of this in all risk assessments carried out in relation to this member of staff.

If a work experience placement involves working with a member of staff off-site or working with a member of staff on their own for longer than half a day, the student's parents or guardians should be informed prior to the work experience placement. In addition, when the student goes off-site the employee must advise a manager where they are going, the reason for the visit and how long the visit will take.

Licensing

Safeguarding is central to the role of the licensing service. The Council's licensing policies, procedures and regulations seek to safeguard children and vulnerable people from the potential harms caused by gambling, alcohol, unsafe transport services, criminal activities, associated licensable activities and restricting access to adult only services and products within the powers attributed to the Council.

The Council has a wide range of powers and discretion to refuse, revoke and/or suspend licences where, for example, safeguarding concerns arise. More proactively, we impose a mandatory safeguarding training regime for taxi and private hire licence holders.

More information on licensing can be found here.

Safety Advisory Group

The Safety Advisory Group's purpose is to bring together statutory partners to review event safety including safeguarding people attending events and those impacted by events taking place in the vicinity of where they live, work or travel.

Specific aspects of the SAGs responsibility include an overview of security and counter-terrorism arrangements, policies, and procedures for safeguarding children and vulnerable adults and other arrangements to ensure public safety standards are maintained. The SAG's terms of reference can be found on the council's website.

Council owned commercial buildings

A number of Council assets are/may be occupied by organisations who will provide services or activities for children, young people or vulnerable adults. To ensure due diligence on the Council's behalf in these circumstances, the organisation will be expected to demonstrate as a condition of use that it has a safeguarding policy in place that adheres to the principles of the GSCP and GSAB.

The Council will also make clear in all occupancy agreements both the terms of use for the property and seek assurances that the organisations have robust protocols in place to mitigate any specific safeguarding concerns i.e. how they would mitigate the risk of other users if they do not have sole use of a building.

Safeguarding Practice

Safer Recruitment

Safer recruitment is a set of practices to help make sure staff and volunteers are suitable to work with children, young people and vulnerable adults. Cheltenham Borough Council operates safer recruitment processes which are followed for all staff appointments during the recruitment process, including:

- Advertising job vacancies
- Job descriptions and person specifications
- Submitting an application
- Shortlisting
- Disability
- Selection process
- Offer of employment and pre-employment checks

Training

All staff will also receive information about safeguarding during induction.

Service managers are responsible for ensuring that members of staff in relevant posts have the appropriate level of training for their role. All staff and volunteers working with children, young people and vulnerable adults must attend safeguarding training appropriate to their role.

However, as a minimum all staff must undertake the following foundation safeguarding modules that meet GSAB and GSCP standards:

- safeguarding children,
- safeguarding adults under the care act.

Staff who work in key areas including housing, anti-social behaviour and enforcement will receive enhanced safeguarding training to allow them to carry out their roles safely, fulfil their statutory responsibilities and in line with current legislation.

All safeguarding training that CBC staff or volunteers undertake will align to GSCP and GSAB best practice and delivered by an appropriately trained individual. Training will be reviewed in line with this policy either due to legislative changes or as part of the scheduled review of this policy.

Prevent training

Prevent is the name given to a national counter-terrorism strategy which aims to stop people from becoming violent extremists or supporting terrorism. To allow the Council to fulfil its statutory duties under that strategy all Council staff must receive basic prevent training.

Safeguarding Allegations against a Member of Staff, Volunteer or Elected Member

The Council takes seriously any allegations or complaints about the conduct of staff, elected members and volunteers in respect of their contact with children, young people, and vulnerable adults. All allegations or complaints received by the Council will be discussed with appropriate safeguarding agencies for advice before action is taken. At the appropriate time all allegations will be investigated fully by the Council, and where applicable action will be taken against the individual via the disciplinary procedure. If deemed necessary, the individual will be suspended whilst the investigation takes place.

Review the full procedure

Support for Staff/Volunteers/Elected Members when an allegation against an individual is made.

Support will be provided for any member of staff, volunteer or elected member subject to an allegation as indicated in the Council's disciplinary procedure.

The Council assures all staff,volunteers and elected members that it will fully support and protect anyone who in good faith (without malicious intent) reports his or her

concerns about a colleague's practice or the possibility that a child or vulnerable adults may be being abused or bullied.

The person who receives information concerning a suspected case of abuse by another member of staff,volunteer or elected member should make a full record of what has been said as soon as possible and pass the information on to their Line Manager or Service Manager or Director.

Information Sharing

The Council takes its data protection responsibilities seriously and ensures that personal data is always dealt with in accordance with the Data Protection Principles. Practitioners must have due regard to the relevant data protection principles that allow them to share personal information.

The UK GDPR 2021 and Data Protection Act 2018 place greater significance on the need for organisations to be transparent and accountable in relation to their use of data. All organisations handling personal data must ensure that they have in place comprehensive and proportionate arrangements for collecting, storing and sharing information. This also includes arrangements on informing service users about the information that they will collect and how this may be shared.

The UK GDPR 2021 and Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

To effectively share information:

- All practitioners should be confident of the processing conditions that allow them to store and share the information that they need to carry out their safeguarding role. Information that is relevant to safeguarding will often be data which is considered to be "special category personal data", meaning that it is sensitive and personal.
- Where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as one of conditions that allows practitioners to share information with others without consent.
- Information can be shared legally without consent, if a practitioner is unable to, or cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.
- Relevant personal information can also be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional, or mental harm, or if it is protecting their physical, mental, or emotional wellbeing.

Practitioners looking to share information without consent should consider which processing condition in the Data Protection Act 2018 is most appropriate in the particular circumstances of the case. This may be the safeguarding processing condition or another relevant provision.

The Council will use personal data for a limited number of purposes and always within the rules set out in the UK GDPR 2021 and Data Protection Act 2018. The Authority will process data to protect individuals from harm or injury. Further information is available in our privacy notice

Retention of Safeguarding records

Individual safeguarding records should be retained for the following periods:

For Adults - the retention period is 6 years after the last entry on the record

For children – the retention period is until the child's 25 birthday unless there is an allegation of sexual abuse.

In cases where there is an allegation of sexual abuse information should be kept until the child's 75th birthday.

For allegations of sexual abuse that concern a member of staff then the retention period is until that member of staff's retirement age or 10 years after the allegation.

Images of children

Parental Consent

Parental consent should be sort before taking photos of children. At closed events or activities this should be done either in writing directly with parents or if the children are being supervised by a partner organisation via that organisation.

At large public events where written consent is not possible, the following guidelines must be followed.

- It must be made clear through event marketing and signage both pre-event and during the event that photographs and/or video will be taken.
- Where individual children and young people are the focus of the images verbal consent should be sort from the parent or carer.

If a parent or carer withdraws consent, then the Council will take all practical steps to remove and delete the images.

Images without parental consent

There may be times when the images of children and young people need to be captured or shared without parental consent to allow the Council to fulfil its statutory duties. Any sharing of images without consent will only be done to support enforcement or safeguarding once the risk of sharing has been weighed against the public benefit to share. The rationale for sharing should be recorded. Images that the Council does not have consent for will only be shared with officers from necessary partner agencies. Images without consent must not be shared publicly.

Safeguarding Procedures

This section outlines the key protocols for how we will deal with safeguarding issues.

Listening to Children and Vulnerable Adults

As adults with trust and influence, council staff and elected members are in a powerful position to recognise and receive information about abuse. However, it is not their responsibility to decide if a child or vulnerable adult is being abused; their role is to act on their concerns.

If a member of staff or elected member is told about potential or alleged abuse:
- Stay calm.
- Listen carefully to what they have to say, without making any judgement.
- Try not to ask questions, but if you have to make sure they are open-ended questions to clarify understanding and not to probe or investigate.
- Do encourage them to talk.
- Do not give an opinion or offer advice.
- Be honest with them about what you can and cannot do.
- In the case of children or other times when you have a duty to report make sure to tell them that you are not able to keep what they have told you secret.
- Tell them that you will try to find them the help they need.
- When they have finished, make a detailed note of what they have said, using their words where possible, and date the record.
- Do not contact or confront the individual who is alleged to be responsible.
- Re-assure the child / young person / vulnerable adult that they have done the right thing.
- Maintain confidentiality, only discuss with relevant people as outlined in this policy.

What to do if you have concerns

It is not the responsibility of an employee to take individual responsibility for deciding whether abuse is taking place. However, there is a responsibility to protect children and vulnerable adults in order that appropriate agencies (e.g., local social services or the police) can then make enquiries and take any necessary action.

The Council recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the potential malpractice.

In being vigilant of child and vulnerable adult protection it is crucial that all employees with responsibility for care are aware of the steps used to recognise signs of abuse. In these situations, or where concerns still exist, any suspicion, allegation or incident of abuse must be reported using the appropriate procedures as soon as possible.

Once the incident/allegation has been reported following the procedure the Council's Designated Officer should be informed so that they can offer the member of staff advice as appropriate and ensure necessary action is taken.

Dealing with Allegations Against Staff

Should an individual member of staff become aware of an allegation (against a colleague) of an incident of child abuse taking place, or having taken place, they should follow the procedure below:

- Take the allegation seriously. It is your duty to consider any allegation to be potentially dangerous to the child and therefore report it.
- As part of your report, make a written record of any details of which you are aware.
- Report the allegation to the Designated Safeguarding Officer giving details of the allegation, how you became aware of it and any other relevant details. Try not to cloud your report with your opinions or judgements.
- Do not judge or investigate. As an employee, it is important not to lose focus of your role. By reporting an allegation quickly, any necessary investigations and/or judgement can be made by trained professionals, i.e., social services and/or the police.

Maintain Confidentiality

It is extremely important that any allegations are not discussed (unless absolutely necessary) as any breaches could be damaging to the child or vulnerable adult or the alleged perpetrator and to any investigation which may follow. Any requests for information from members of the public (including parents, guardians, or carers) or the media should be directed to the customer relations or the communications team as appropriate.

Support

Consideration should be given to the kind of support that children, parents, and members of staff may need. Use of help lines, support groups and open meetings will maintain an open culture and help the healing process.

Allegations of historic abuse

Allegations of abuse may be made some time after the event (e.g., by an adult who was abused as a child or by a member of staff who is still currently working with children).

Where such an allegation is made, the person should follow the procedure as detailed above contacting the Designated Safeguarding Officer who would then notify the police.

How do I report a concern?

If a child or vulnerable adult is in immediate danger you should always ring 999 in the first instance.

In all other cases as soon as possible share your concerns with the Designated Safeguarding Officer (or deputy in their absence) to clarify your thinking. Keep a written record of the facts and any actions you take.

Children

If you think a child is at immediate risk of significant harm, contact the Children's Helpdesk on 01452 426565 (Monday – Friday 9am-5pm) or when out of hours 01452 614194.

If you are not sure if you should make a formal referral, you can discuss your concern in principle by contacting the helpdesk.

Full procedure

Vulnerable Adults

If you think a vulnerable adult is at risk of harm contact the Adult Helpdesk 01452 426868 or when out of hours, the Emergency Duty Team 01452 614758.

If you have a concern but are not sure if you should make a formal referral, you can have an in principal discussion with a social work practitioner.

Full procedure

Information for social services or the police about suspected abuse:

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern or as soon as practically possible afterwards.

Stalking

To report a stalking concern please use the Gloucestershire Constabulary procedure found here

Radicalisation

To report a concern about radicalisation please contact the prevent team at Gloucestershire Constabulary here

Modern Slavery/Human Trafficking

To report a concern about modern slavery or human trafficking use the Gloucestershire Constabulary online form that is found here.

Domestic Abuse

Gloucestershire Tackling Domestic Abuse Strategy (2025 – 28)

The Gloucestershire Domestic Abuse Local Partnership Board (LPB) has overseen the development of the 2025–28 strategy, ensuring it meets the requirements of the

Domestic Abuse Act and Regulation 5 of the 2021 Domestic Abuse Support Regulations.

The strategy continues to focus on five key priorities:

Prevention and early intervention

Multi-agency working and pathway development

Workforce development

High-quality service provision

Addressing perpetrator behaviour

These priorities align with Cheltenham Borough Council's Safeguarding policy, supporting the strategy and fulfilling the requirements of the Domestic Abuse Act.

Disclosure

It is understandably difficult to disclose domestic abuse. When you receive a disclosure of domestic abuse always try to

- Be sensitive and non-judgmental
- Find a private space and allow time
- Discuss safety
- Offer specialist support

However, it is important that you:

- Do not seek proof of the abuse
- Do not contact the abuser
- Do not adopt the role of support worker yourself
- Do not compel the person to accept specialist support

Safety

It is vital to consider the safety of the person who has disclosed. Staff and elected members should take any actions necessary to ensure the person's immediate safety if necessary. GDASS is the local support service for domestic abuse and can offer guidance on safety planning in the longer term.

Staff and elected members should always consider their own safety as well as that of other people associated with the Council or the public. Any concerns about safety can be raised with the designated safeguarding officer or the HR safeguarding lead.

Risk

Domestic abuse results in the death of around two women per week and 30 men per year. It is therefore vital in case of domestic abuse to establish the risk posed so that necessary action can be taken.

Staff and elected members should complete a DASH form to help them clarify the risk. This should wherever possible be completed with the person making the disclosure. This can help support safety planning and determine what the next steps are. As depending on the risk, it may be necessary to involve other agencies. Support with the DASH form can be given by the designated safeguarding officer or via the GDASS helpline.

Consent

Any disclosure must be treated with strict confidentiality and only shared with consent of the individual. The only exceptions to this are:

- In the case of high-risk domestic abuse
- If there is a risk to children
- If there is risk to a vulnerable adult
- If a crime has been committed

Children and domestic abuse

Although domestic abuse is defined as between people over 16 it is important to remember that children can be affected by domestic abuse as well. This can be because they are witnessing the abuse between adults which can have long term effects on their development. Or it could be because they are experiencing the same abusive behaviour in their own intimate relationships. Concerns related to children should be reported and dealt with under the safeguarding children guidance with a mind to the risk associated with domestic abuse even in younger teenage relationships.

Once you have reported the concern

When a member of staff or elected member has reported a safeguarding concern to an external agency, they must send a notification to safeguarding@cheltenham.gov.uk and cc in the relevant designated officer depending on if it is housing or non-housing related. The email should include a summary of the concern, who it was reported to, and any actions necessary. This will ensure that necessary support can be given as well as allow the Council to monitor reporting of safeguarding concerns to ensure it is fulfilling its statutory duties.

Escalation of professional disagreements

Sometimes situations will arise when organisations, feel that the safeguarding decision made by a worker from another agency is not a safe decision. The safety of individual children or vulnerable adults is the paramount consideration in any professional disagreement and any unresolved issues should be addressed with due consideration to the risks that might exist for the child or vulnerable adult.

All staff should feel able to challenge decision-making and to see this as their right and responsibility in order to promote the best multi-agency safeguarding practice. Resolution should be sought within the shortest timescale possible to ensure the child or vulnerable adult is protected.

Equally all staff should be open to be challenged by a partner agency if that agency believe that a member of Council staff has made an unsafe decision that does not take into full account the welfare of a child or vulnerable adult.

If a member of staff is concerned about a safeguarding decision or receives a challenge from another agency about a decision they have made, they should discuss it with the Designated Safeguarding Officer or a Deputy Designated Officer and agree how they will address it directly with the worker or their immediate

supervisor in the other agency. The concern and actions taken to resolve it should be recorded.

If the concern is not resolved the Designated Safeguarding Officer will follow the appropriate procedures dependant on whether it is a child or vulnerable adult through Gloucestershire Safeguarding Partnership's escalation policy or the Gloucestershire Safeguarding Adult Protocol.

It is the responsibility of the following Council officers to lead on resolving the disagreement at the relevant stage:

Stage 1 – member of staff and line manager receiving or making escalation
Stage 2 – Designated Safeguarding Officer – Tracy Brown (non-housing services) and Amanda Wray (housing)
Stage 3 – Leadership Team Safeguarding Lead – Claire Hughes

At stage 4 of the escalation the GSCP executive or the GSAB chair will support the organisations to achieve a resolution in the best interest of the child or vulnerable adult.

Appendix 1 – Gloucestershire Partnership meetings related to safeguarding attended by Council Officers

Gloucestershire Safeguarding Adult Board (GSAB)

Gloucestershire Safeguarding Children Partnership (GSCP) Management Team

GSCP and GSAB District Subgroup

GSCP Child Exploitation and Missing Subgroup

GSCP Quality and Improvement Subgroup

Strategic Modern Slavery Partnership

Operational Modern Slavery Partnership

Appendix 2 Signs and Definitions of Abuse

Children and Young People

In accordance with guidance provided by *Working Together to Safeguard Children 2018* and based on the *Children Act (1989) and (2004)* the terms children, child, young person or young people shall for the purposes of this policy be deemed to mean:

> *"Anyone who has not yet reached their 18th birthday. The fact that they have reached 16 years of age; are living independently or in further education; are a member of the armed forces; in hospital or in custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection under the Acts and this policy".*

A child may be at risk of abuse in many ways:

TYPE	DEFINITION	SOME POTENTIAL INDICATORS
Emotional	The persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development.	Conveying to children that they are worthless or inadequate; imposing age or developmentally inappropriate expectations, serious bullying, exploitation, isolation, segregation.
Sexual	Forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware what is happening, including use of images through social media or other IT.	Inappropriate sexual behaviour, use of language, fear of adults, recoiling from physical contact.

Neglect	The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.	Inadequate food, clothing, or shelter. Inadequate access to appropriate medical care or treatment, isolation, truanting, lateness.
Physical	May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.	Unexplained bruising, burns, fractures, weight gain or loss, repeat illness.

Exploitation of Children

Child exploitation is the act of using a child for profit, labour, sexual gratification, or some other personal or financial advantage. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common in exploitative relationships being characterised in the main by the child's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

It is important to always treat children who are being exploited as victims of abuse even though their behaviour may be challenging, or they appear to be making choices. Children often do not understand they are being exploited due to the manipulation of the abuser.

Exploitation takes two main forms criminal exploitation and sexual exploitation although there is often overlap between the types**.**

Criminal Exploitation

There is now a growing understanding of the issue of criminal exploitation of children, and it is defined in the Governments Serious Violence Strategy as:

"Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology."

Criminal exploitation is one of the main methods used by County Lines gangs.

Sexual Exploitation

'Sexual exploitation of children and young people under 18 involves exploitative situations, contexts, and relationships where young people (or a third person or persons) receive 'something' (e.g., food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

Vulnerable Adults

A vulnerable adult is any person aged 18 or over, who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs **and:**
- Is experiencing or at risk of abuse or neglect **and**
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect A vulnerable adult may be at risk of abuse in many ways:

TYPE	DEFINITION	POTENTIAL INDICATORS
Physical	The non-accidental use of physical force that results (or could result) in bodily injury, pain or impairment including assault, hitting, slapping, pushing, misuse of medication and restraint.	Unexplained bruising, cowering or flinching, bruising consistent with being hit, unexplained burns, unexplained fractures.
Sexual	Direct or indirect involvement in sexual activity without consent.	Incontinence, difficulty/discomfort in walking, excessive washing, sexually transmitted diseases, bruising/bleeding in genital areas, bruising, urinary infections
Emotional/ Psychological	Acts or behaviour which impinge on the emotional health of, or which causes distress or anguish to individuals.	Disturbed sleep, anxiety, confusion, extreme submissiveness or dependency, sharp changes in behaviour, loss of confidence or appetite.
Neglect & Acts of Omission	Ignoring or withholding physical or medical care needs which result in a situation or environment detrimental to the individual.	Ignoring medical, emotional or physical care needs (incl. dressing), failure to provide access to appropriate health care, withholding medication, adequate nutrition and heating.

Financial & Material Abuse	Unauthorised, fraudulent obtaining and improper use of funds, property or any resources of an adult at risk. Scamming and coercion in relation to an adult's financial affairs.	Unexplained or sudden inability to pay bills, unexplained withdrawals of money from accounts, personal possessions going missing, unusual interest by a friend/relative/neighbour in financial matters.
Discriminatory	When values, beliefs or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals. This includes discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person's disability or any other form of harassment, slur or similar treatment.	Inciting others to commit abusive acts, lack of effective communication, bullying.
Institutional/ Organisational	Where the culture of the organisations places the emphasis on the running of the establishment above the needs and care of the person.	Lack of care plans, contact with the outside world not encouraged, no flexibility or lack of choice.
Self-neglect	Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.	A deterioration in physical appearance, lack of grooming, rapid weight gain/loss.

There are a number of specific acts that constitute abuse which could affect both adults and children;

Female Genital Mutilation (FGM)

FGM is a collective term used for illegal procedures, such as female circumcision, which include the partial or total removal of the external female genital organs, or injury to the female genital organs for a cultural or non-therapeutic reason.

Honour Based Violence (HBV)

HBV is abuse, covering a variety of behaviours (including crimes), mainly but not exclusively against females, where the person is being punished by their family and/or community for a perceived transgression against the 'honour' of the family or community, or is required to undergo certain activities or procedures in 'honour' of the family.

It is a form of domestic abuse which relates to a victim who does not abide by the ‘rules’ of an honour code. This will have been set at the discretion of relatives or community; the victims are punished for bringing shame on the family or community.

Forced Marriage

In a forced marriage a person is coerced into marrying someone against their will. They may be physically threatened or emotionally blackmailed to do so. It is an abuse of human rights and cannot be justified on any religious or cultural basis.

It is not the same as an arranged marriage where they have a choice as to whether to accept the arrangement or not. The tradition of arranged marriages has operated successfully within many communities and countries for a very long time.

Stalking

The Protection of Freedoms Act 2012 defines “stalking” as an offence. However, there is no legal definition, but examples include: following or spying on a person or forcing contact with the victim through any means including social media. Any of these examples carried out repeatedly or persistently can cause significant alarm or distress.

Radicalisation

Prevent is a government strategy which aims to raise awareness and resilience to radicalisation. It recognises that children and vulnerable adults can be susceptible to extremist views and coerced into criminal behaviour.

Modern Slavery

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. It involves people being forced to work through mental or physical threat, owned or controlled by an ‘employer’ usually through mental or physical abuse or the threat of abuse, dehumanised and being treated as a commodity or bought and sold as ‘property’.

Human Trafficking

Takes place when a victim is moved from one place to another for the purpose of exploitation, this could be through sexual exploitation, domestic servitude, forced labour, forced criminality or organ harvesting. The trafficker is able to control and exploit through violence, coercion or deception.

Cyber Crime

Cyber-crime is defined as criminal activity carried out by means of computers or the internet. Criminals are increasingly exploiting the speed, convenience, and anonymity of the internet to commit a diverse range of criminal activities without physical or virtual boarders. These crimes can cause serious harm and pose significant threats to vulnerable adults and children. Cyber-crime may take the form of cyber bullying. Cyber-bullying is the process of using the internet, mobile phones or other devices to send or post text or images intended to hurt or embarrass another person. Victims of cyberbullying may not know the identity of their bully, or

why the bully is targeting them. The harassment can have wide-reaching effects on the victim, as the content used to harass the victim can be spread and shared easily among many people and often remains accessible for a long time after the initial incident.

Domestic Abuse

Domestic abuse is unfortunately very common with an estimated 1 in 4 women and 1 in 6 men experiencing domestic abuse in their lifetime. It is defined as an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between people over 16 who are or have been an intimate partner or family member regardless of gender or sexuality. Some of the signs of domestic abuse may include; unexplained bruising, cowering, or flinching, isolation from friends and family, emotional abuse, withholding finances. Domestic Abuse can result in serious injury or death so should always be treated serious and appropriate advice sort.

Harassment

On occasions staff or elected members may experience harassment that does not fall into the category of either stalking or domestic abuse. If a member of staff or elected member experiences harassment, they should report the issue to the Designated Safeguarding Officer or Deputy Designated Safeguarding Officer who will support them to create a safety plan in partnership with the Publica Health and Safety Advisor and any external partners deemed appropriate.

Appendix 3 – Further information links and useful contacts

Children

Gloucestershire One Plan for children and young people

Gloucestershire Safeguarding Children Partnership website

Gloucestershire Safeguarding Partnership Procedures

Working Together to Safeguard Children - Statutory Guidance

Children Act 2004

Vulnerable Adults

Gloucestershire County Council Vulnerable Adults Safeguarding Advice

Adults with care and support needs - definition | Safeguarding Adults in Gloucestershire

Make Every Adult Matter (MEAM)

Care Act 2014

Domestic Abuse

Domestic Abuse Related Deaths Reviews

Improving access to social housing for victims of domestic abuse - GOV.UK

Gloucestershire Domestic Abuse Strategy

Add link to CBC's DA policy when published

Gloucestershire County Council Children's Helpdesk	Tel 01452 426565 childrenshelpdesk@gloucestershire.gov.uk
Gloucestershire County Council Adults Helpdesk	Tel 01452 426868 socialcare.enq@gloucestershire.gov.uk
Gloucestershire Domestic Abuse Support Service	Tel 01452 726 570 support@gdass.org.uk
Gloucestershire Rape and Sexual Abuse Centre	Tel 01452 305421 support@glosrasac.org.uk
Gloucestershire's Sexual Assault Referral centre - SARC	Tel 0300 421 8400
Family Information Service	familyinfo@gloucestershire.gov.uk
Police Non-Emergency	101
NSPCC	Tel 0808 800 5000
Childline	Tel 0800 1111
Crimestoppers	Tel 0800 555111
Victim Support	Tel 0808 281 0112
Age UK	Tel 01452 422660
Samaritans	Tel 0330 094 5717
Modern Slavery National Helpline	Tel 0800 808 3733
P3	Tel 0115 8508190
VIA	Tel 01452 223 014 gloucestershire@viaorg.uk

Concern about an employee, casual worker, volunteer, or elected member working with children or vulnerable adults

If you receive an allegation or have a concern about the behaviour of a member of staff, elected member or volunteer working or volunteering with children or vulnerable adult and that concern could amount to:

a. a member of staff,volunteer or elected member has behaved in a way that has harmed a child or vulnerable adult, or may have harmed a child or vulnerable adult; or

b. possibly committed a criminal offence against or related to a child or vulnerable adult; or

c. behaved towards a child or vulnerable adult in a way that indicates s/he is unsuitable to work with children or vulnerable adults.

then you should: -

⬇

Report the concerns

Report your concerns to the Designated Safeguarding Officer:

Tracy Brown, Safeguarding and Partnership Manager: 01242 264142 (non-housing) or email Amanda Wray Safeguarding and Equalities Manager (housing)
or
HR Safeguarding Lead Shona Corbett : 01242264233 or email

⬇

Completion of written record

Complete a written record of the nature and circumstances surrounding the concern including any previous concerns held. Include where the concern came from and brief details only.

⬇

Seek advice before proceeding – Initial Discussion

The Designated Safeguarding Officer, will liaise with the below before any CBC investigation takes place:

For allegation regarding working with children –
Local Authority Designated officer (LADO) Tel: 01452 426 994

For allegations regarding working with vulnerable adults –
Police or Adult Social Care Helpdesk Tel: 01452 426868

This is because it might meet the criminal threshold and so your investigation could interfere with a police or Social Care investigation. They will offer advice on any immediate action required and will assist with employment and safeguarding issues.

⬇

Allegations Management Process

If following advice, a multi-agency meeting is convened, the Designated Safeguarding Officer and/or another appropriate manager will attend on behalf of the Council. This might result in a criminal investigation, a Social Care investigation and/or an investigation to inform whether disciplinary action is required. It may also result in no further action.

If it does not meet the criteria for multi-agency investigation or once this is concluded any further action will be taken using the Council disciplinary procedures.

An employee, casual worker, volunteer, or elected member at Cheltenham Borough Council has concerns about a vulnerable child

If you have a concern about the wellbeing of a child (or unborn baby), including cases of domestic abuse then you should: -

Consultation with the Designated Safeguarding Officer or Deputy Designated Safeguarding Officer

Share your concerns with the appropriate officer to help clarify the nature of your concern and what to do next.

Completion of written record

Complete a written record of the nature and circumstances surrounding the concern including any previous concerns held. If no further action is necessary at this time, it is still important to keep a secure record of your concern.

Contact social care for advice if necessary

In those cases where you have a concern but are unsure about how to proceed contact the Children's helpdesk to discuss.

Children's Help Desk Tel: 01452 426565

Contact the children's helpdesk

In those cases where you are clear an immediate social work assessment is required make a referral using

Telephone: 01452 426565

or

If the concern is less urgent, please make the referral using the

online multi-agency request for service portal

The social care team will then take responsibility for managing any subsequent enquiries.

Inform the Designated Safeguarding Officer

Whenever you make a referral to social care, please make the Designated Safeguarding Officer aware via email. They then have a record and can support if further action is necessary.

Resolving professional difference

Remember to use the escalate concerns if you believe an unsafe decision has been made

An employee, casual worker, volunteer, or elected member at Cheltenham Borough Council has concerns about a vulnerable adult

If you have a concern about the wellbeing of a vulnerable adult, then you should: -

Consultation with the Designated Safeguarding Officer or Deputy Designated Safeguarding Officer

Share their concerns with the appropriate officer to help clarify the nature of your concern and what to do next.

Completion of written record

complete a written record of the nature and circumstances surrounding the concern including any previous concerns held. If no further action is necessary at this time, it is still important to keep a secure record of your concern.

Contact social workers for advice if necessary

In those cases where you have a concern but are unsure about how to proceed contact the

Adult Helpdesk: (01452) 426868

and have an in principal discussion.

Contact the adult's helpdesk

In those cases where you are clear a social work assessment is required make a referral to the:

Via the Gloucestershire Adult Social Care Portal

Inform the Designated Safeguarding Officer

Whenever you make a referral to social care, please make the designated safeguarding officer aware via email. They have a record and can support if further action is necessary.

Resolving professional difference

Remember to use the escalate concerns if you believe an unsafe decision has been made.

Cheltenham Borough Council

Cabinet – 18 November 2025

Community Infrastructure Levy Host Authority and Terms of Reference Review

Accountable member:

Cllr Rowena Hay, Leader

Accountable officer:

Tracey Birkinshaw – Director Planning and Building Control

Ward(s) affected:

All

Key Decision: No

Executive summary:

The purpose of this report is to seek Member agreement for Tewkesbury Borough Council to retain its position of host of the Community Infrastructure Levy (CIL) Joint Committee and approve the attached Terms of Reference (ToR) with minor amendments (for clarity of understanding purposes only) as the framework under which the CIL Joint Committee will continue to function.

The ToRs contain a requirement for both elements to be reviewed a minimum of every two years and that timescale expires before the end of January 2026.

Recommendations: That Cabinet:

1. **agrees that Tewkesbury Borough Council retains its appointment as the host authority for the Community Infrastructure Levy (CIL) Joint Committee from January 2026.**
2. **agrees that the Community Infrastructure Levy (CIL) Joint Committee Terms of reference remain as approved by Council in January 2024, other than the minor points of clarification as identified in Appendix 3.**

1. Implications

1.1 Financial, Property and Asset implications

With Tewkesbury Borough Council remaining as the host authority for the CIL Joint Committee and the main key officer roles supporting the CIL Joint Committee, and the daily operational management of the adopted CIL Charging Schedules appointed under contract through Tewkesbury Borough Council, the CIL Administration Fee raised annually from CIL receipts within the Cheltenham Borough Council CIL Charging administrative area, as required to support the relevant roles/functions will continue to be transferred to Tewkesbury Borough Council to allocate on the administrative expenditure it has to support the administration of CIL. This will include regular monitoring of CIL Administrative spending.

Signed off by: John Whitlock Jon.whitlock@cheltenham.gov.uk

1.2 Legal implications

The Review of the CIL Joint Committee Host Authority arrangements and its ToRs is taking place to ensure that the three member councils comply with the requirements for such a review as set out in the agreed CIL Joint Committee ToRs. Continuing such arrangements ensures that the three member councils continue to comply with the legislative requirements contained within the Planning Act (2008) and the Community Infrastructure Levy Regulations 2010 (as amended) in respect of the proper administration and allocation of CIL.

For the recommendations to be implemented it will be necessary for all three CIL Joint Committee member councils to reach a consensus agreement on those recommendations. Reports containing the same recommendations will be put forward to Cheltenham Borough Council Cabinet and Tewkesbury Borough Council Executive accordingly as close as possible to the date of the Gloucester City Council Cabinet report as the recommendations must be agreed under consensus vote across the three member councils.

Signed off by: Charolotte Lockwood, Locum Senior Solicitor, One legal legalservices@onelegal.org.uk

1.3 Environmental and climate change implications

This is a review of the operating framework under which the existing fully constituted CIL Joint Committee is to be hosted and the ToRs framework against which it conducts its business. It is not proposed to make any changes to the current arrangements. It does not relate to a new project or policy, however reviews existing arrangements.

Through future decisions to allocate CIL Infrastructure Fund receipts to projects, the

CIL Joint Committee would consider those projects submissions which also include a completed Climate Change Impact Tool which forms part of the submission requirements for each CIL funding bid submitted. Some of the projects supported for the allocation of CIL funding will contribute towards delivering against the respective councils' carbon emergency aspirations.

Signed off by: Maizy McCann, Climate Officer, Maizy.McCann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

Key priority 1: Securing our future
Key priority 2: Quality homes, safe and strong communities
Key priority 3: Reducing carbon, achieving council net zero, creating biodiversity
Key priority 4: Reducing inequalities, supporting better outcomes
Key priority 5: Taking care of your money

1.5 Equality, Diversity and Inclusion Implications

See **Appendix 2**. This report relates to a review of current process. Some of the projects that the CIL Joint Committee may consider in the future are likely to be subject to their own separate Equalities Impact Assessment in due course (where these have not already been completed) and as appropriate this will be considered by the CIL Joint Committee.

1.6 Performance management – monitoring and review

The CIL Joint Committee ToRs require that the host authority is reviewed every 2 years, and its ToRs as a minimum every two years. There is nothing to prevent an earlier review of either element taking place as the ToRs also allow an earlier review as a consequence of any key changes in policy and or legislation relating to CIL or by a member council wishing to review the proportion of net CIL receipts that the member councils pool pursuant to the ToRs.

The potential impact of the current Local Government Reorganisation (LGR) on the legal and operational framework of the CIL Joint Committee will be kept under review as the LGR process progresses. It is the responsibility of all the accountable officers across the three member councils of the CIL Joint Committee, the CIL Joint Committee Monitoring Officer, and Senior Responsible Officer for the Committee to monitor this along with the support of other relevant officers, and escalate any concerns to relevant Senior Officer and Members including any need for legal and/or Monitoring Officer advice in advance.

In the event that no early review is required, it is likely that a review will be initiated from April 2027 to inform a report to Members around November 2027 to ensure that

any review is completed by the end of January 2028.

2 Background

2.1 On 25 January 2024, Council approved the establishment of a Community Infrastructure Levy Joint Committee 'CIL Joint Committee' under s101(5) and s102 Local Government Act 1972 and under Part 1A Chapter 2 Section 9EB of the Local Government Act 2000 and pursuant to the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012.

2.2 The CIL Joint Committee comprises the three CIL Charging Authorities of Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council. It was therefore necessary for each authority to separately agree to the establishment of the CIL Joint Committee and the relevant matters that were required to support its operational framework, including which Council would host it and the Terms of Reference (ToRs) under which it would deliver its functions.

2.3 At the same meeting approval was given to:

i. Agree the CIL Joint Committee Terms of Reference 'ToRs', which included appointing Tewkesbury Borough Council as the host authority;

ii. Agree the pooling of strategic infrastructure CIL monies by the three partner Councils of Cheltenham, Gloucester, and Tewkesbury; and

iii. Agree that engagement with wider infrastructure providers, outside the local authorities, should be entered into.

2.4 With the appointment of Tewkesbury Council as the host authority for the CIL Joint Committee, Alistair Cunningham, its Chief Executive became the senior responsible officer (SRO) for the CIL Joint Committee, and as host the ToRs require the host authority to be responsible for providing secretarial/clerk S151 and Monitoring Officer roles for the Committee, which also covers democratic services support.

2.5 The agreed CIL Joint Committee ToRs contain the details of the operational framework and scope of function of the CIL Joint Committee. These included the following requirements.

a) To review the host authority of the CIL Joint Committee every two years; and

b) To review the CIL Joint Committee Terms of Reference as a minimum every two years

2.6 The CIL Joint Committee ToRs at Appendix 3, first approved were dated November 2023, and the last council of the three to agree the establishment of the CIL Joint Committee and its ToRs was Gloucester City Council on 24 January 2024. The CIL Joint Committee host authority, and its ToRs came into effect from this date.

2.7 At the first meeting of the CIL Joint Committee on 12 November 2024 it established and adopted ToRs for a supporting CIL Joint Officer Working Group (CILJOWG). The structure CIL JOWG was used by officers to undertake a joint officer review of the CIL Joint Committee ToRs and hold a discussion on the host authority arrangements to inform the current recommendations. The Monitoring Officer for Gloucester City Council and Cheltenham Borough Council were also invited to this meeting which took place on 09 September 2025.

2.8 The outcome of officer discussion was that it should be recommended to each CIL Joint Committee member council that:

i. Tewkesbury Council remain the host authority for the next two years; and

ii. The CIL Joint Committee ToRs should remain as first approved not to be reviewed other than some minor points of clarification as identified in Appendix 3 to this report as shown track changed.

2.9 It is proposed that some very minor changes are made to the ToRs as during officer discussion it was identified that in a few places the CIL Joint Committee ToRs could benefit from a few very minor amendments to do nothing more than clarify understanding, including incorporating the detail of dates when the CIL Joint Committee was established to bring them up to date.

3 Reasons for recommendations

3.1 With respect to Tewkesbury Borough Council remaining the host authority for the Joint CIL Committee:

a. Tewkesbury Borough Council of the three member councils generates the greatest amount of CIL receipts;

b. Tewkesbury Borough Council, having been appointed as the initial host authority, now has an established process in place for the support functions for the CIL Joint Committee; and

c. Some key officer roles outside of the ToRs requirements supporting the CIL Joint committee and the operational functions of each CIL Charging Authority are currently contracted via Tewkesbury Borough Council.

3.2 Retaining Tewkesbury Council as the host authority will help the continuance of the smooth operation of its functions, kept under review in the context of Local

Government Reorganisation.

3.3 There is no requirement to trigger a debate on the content of the CIL Joint Committee ToRs every time there is a need to review them. If officers undertaking the review consider they cover all areas necessary for the CIL Joint Committee to meet its legislative requirements and ToRs requirements, and nothing had changed to require any amendments, then it can be recommended by officers that they remain as previously agreed.

4 Alternative options considered

4.1 With a requirement set out in the ToRs to review the host authority every two years, and the ToRs content as a minimum every two years, it is necessary that a report be brought forward containing such.

4.2 The officer discussion considering the host authority for the CIL Joint Committee did consider appointing either Cheltenham Borough Council or Gloucester City Council as the host authority, however as Tewkesbury Borough Council now has an established framework to support this, and receipts the most significant amount of CIL payments of the three member councils, it made sense to continue for the next two years under the same arrangement.

4.3 The requirement to review the CIL Joint Committee ToRs a minimum of every two years would not automatically trigger the need for a recommendation from an officer for Members to review and debate them. Officer discussion concluded that they cover all the matters necessary and are functioning effectively, and thus there was no basis on which they need to be reconsidered by the member councils. Those minor clarification points shown as track changes in Appendix 3 are not considered to materially impact their content.

4.4 The stage that the emerging Local Government Review is at and its potential future impact was also discussed. There is nothing that would prevent the host authority arrangements or the ToRs from being reviewed within the next two years should that be necessary.

5 Consultation and feedback

5.1 Not relevant for the purposes of this report.

6 Key risks

6.1 See **Appendix 1**. The establishment of the Joint Committee has provided robust governance arrangements, which will improve value for money and manage risk and where possible consider opportunities to add value.

Report author:

Sarah Screen, Strategic Infrastructure Planning Manager, for the councils of Cheltenham Borough, Gloucester City and Tewkesbury Borough.
sarah.screen@tewkesbury.gov.uk

Appendices:

1. Risk Assessment
2. Equality Impact Assessment – Screening
3. CIL Joint Committee Terms of Reference with track changes

Background information:

1. Terms of Reference (Council 25 January 2024: Cheltenham Gloucester and Tewkesbury Community Infrastructure Levy Joint Committee Appendix 1.pdf)
2. Report to establish the CIL Joint Committee Gloucester City Council Full Council 25 January 2024 Item 12
3. Report to establish the CIL Joint Committee Cheltenham Borough Council Full Council 11 December 2023
4. Report to establish the CIL Joint Committee Tewkesbury Borough Council Full Council 23 January 2024
5. Report to establish the CIL Joint Committee Tewkesbury Borough Council Executive 10 January 2024 Item 8

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1	If the CIL Joint Committee host authority is not reviewed every 2 years this would trigger a breach of the requirements of the agreed Terms and Reference under which the Joint Committee conducts its business.	All three of the CIL Joint Committee Member Councils (Cheltenham Borough, Gloucester City and Tewkesbury Borough.	5	2	10	Accept risk but also shared risk with the other two CIL Joint Committee member Councils.	Each CIL Joint Committee member council seeks agreement to the recommendations through its own constitutional arrangements	Director Planning & Building Control (alongside Head of Place Gloucester City Council and Director of Growth at Tewkesbury Borough Council)	Cheltenham Borough Council cabinet report 18 November 2025 and Gloucest City Cou Cabinet Novembe 2025 Tewkesbury Borough Council Executive 19 November 2025

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
2	If the CIL Joint Committee Terms of Reference are not reviewed as a minimum every two years this would breach the requirements of the agreed Terms and Reference under which the Joint Committee conducts its business.	All three of the CIL Joint Committee Member Councils (Cheltenham Borough, Gloucester City and Tewkesbury Borough.	5	2	10	Accept risk but also shared risk with the other two CIL Joint Committee member Councils.	Each CIL Joint Committee member council seeks agreement to the recommendations through its own constitutional arrangements	Director Planning & Building Control (alongside Head of Place Gloucester City Council and Director of Growth at Tewkesbury Borough Council)	Cheltenham Borough Council cabinet report 18 November 2025 and Gloucester City Council Cabinet 1 Novembe 2025 Tewkesbu Borough Council Executive 19 November 2025

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
3	There is a requirement that all three Member Councils support the same recommendations as this need to be agreed by consensus		5	2	10	Accept risk but also shared risk with the other two CIL Joint Committee member Councils.	Each CIL Joint Committee member council seeks agreement to the recommendations through its own constitutional arrangements	Director Planning & Building Control (alongside Head of Place Gloucester City Council and Director of Growth at Tewkesbury Borough Council)	Cheltenham Borough Council cabinet report 18 November 2025 and Gloucester City Council Cabinet 1 Novembe 2025 Tewkesbury Borough Council Executive 19 November 2025 9report to full Council if required)

Appendix 2: Equality Impact Assessment (Screening)

1. Identify the policy, project, function or service change

a. Person responsible for this Equality Impact Assessment	
Officer responsible: Sarah Screen *(on behalf of Tracey Birkenshaw)*	Service Area: Planning
Title: Strategic Infrastructure Planning Manager (on behalf of Director Communities and Economic Development)	Date of assessment: 14 October 2025
Signature: *Sarah Screen (on behalf of Tracey Birkinshaw)*	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify: Review of the framework under which the CIL Joint Committee operates.	

c. Name of the policy, function, strategy, service change or project	
The host authority and the Terms of Reference for the Community Infrastructure Levy Joint Committee.	
Is this new or existing?	**Already exists and is being reviewed**
Please specify reason for change or development of policy, function, strategy, service change or project	
No change proposed. The agreed Terms of Reference (ToRs) for the CIL Joint Committee (dated November 2023) require the hosting arrangements for the CIL Joint Committee to be reviewed every two years and the ToRs to be reviewed as a minimum every two years.	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:	To ensure that the CIL Joint Committee comply can continue to function for at minimum the next two years.
Objectives:	To ensure that the requirements of the CIL Joint Committee Terms of Reference and host authority are agreed so that the CIL Joint Committee can continue to complete its business in a fully compliant way and is fully supported by Legal, Democratic Services and monitoring officer support functions
Outcomes:	To ensure that Cheltenham Borough Council makes its decision in respect of the recommendations to support the same recommendations being put forward for consideration to the other two CIL Joint Committee member councils.
Benefits:	The CIL Joint Committee can continue to function compliantly with the framework that has been put in pace for it for at minimum the next two years. This will provide the ability of the Joint Committee to continue as part of its functions to consider the allocation of CIL receipts from the Infrastructure Fund to projects that will benefit the communities, businesses and visitors across Cheltenham, Gloucester, and Tewkesbury.

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Positive**
Please provide an explanation for your answer:	
Ensuring that the CIL Joint Committee can conduct its business compliantly will ensure that CIL receipts paid and added to the CIL Regulation 59(1) Infrastructure Fund can be allocated to help support development through the funding of relevant infrastructure.	

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate	
Stage Two required	**No**
Owner of Stage Two assessment	
Completion date for Stage Two assessment	

Please move on to Stage 2 if required (intranet link).

Appendix 3: CIL Joint Committee Terms of Reference November 2023 – Track changed

Cheltenham, Gloucester and Tewkesbury

Community Infrastructure Levy Joint Committee

Terms of Reference

1 Introduction

1.1 Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council worked together to produce the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy (2017) (the JCS) as the overarching strategy to guide the development of their area as part of their Development Plan. The three councils (the member councils) have agreed to pool the receipts received from the Community Infrastructure Levy (CIL) with the aim of working together to achieve the objectives of their ~~JCS~~Development Plans.

1.2 To facilitate an open and transparent joint approach to the governance of the application of CIL receipts the member councils ~~have~~ resolved to establish a joint committee. The Community Infrastructure Levy (CIL) Joint Committee was formally constituted under a decision made by the member councils at a full Council meeting for Cheltenham Borough Council on 11 December 2023, Gloucester City Council on 24 January 2024, and Tewkesbury Borough Council on 23 January 2024.

2 Purpose

2.1 The Community Infrastructure Levy Joint Committee (the "Committee") shall work jointly and collaboratively to advise the member Councils on CIL generally and make decisions on bids for CIL monies that have been pooled by the constituent Councils. The member Councils of the Committee are charging authorities for the purposes of the Community Infrastructure Levy Regulations 2010 (as amended) (the "CIL Regulations"). The Committee shall consider how community infrastructure levy (CIL) receipts should be spent to support the development of each of the Council's areas, in accordance with Regulations 59(1) and 59(3) of the CIL Regulations.

2.2 Regulation 59(1) of the CIL Regulations provides (1) that charging authority must apply CIL to funding the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of its area.

2.3 Regulation 59(3) of the CIL Regulations provides that a charging authority may apply CIL to funding the provision, improvement, replacement, operation or maintenance of infrastructure outside its area where to do so would support the development of its area.

2.4 The member councils believe that working together to pool CIL receipts for the development of infrastructure within their collective administrative areas will support the delivery of their shared objectives as set out in the ~~JCS~~ statutory Development Plans and consequently will support development within their respective areas in accordance with Regulation 59(3) of the CIL regulations.

3 The Pooled Fund

3.1 In recognition of the joint approach the member councils have agreed that their Infrastructure Funding Statements (IFS) and Infrastructure Lists (IL) ~~which~~ identify infrastructure priorities that are consistent with the objectives of the ~~JCS~~ Development Plans and their localities to support development across the ~~JCS~~ Development Plan areas.

3.2 It is the intention of the member councils to pool 100% of the CIL receipts they receive net of any CIL receipts which are either passported to local councils or are allocated by the member councils to their individual neighbourhood CIL funds in accordance with Regulation 59A and 59F of the CIL regulations respectively.

3.3 Notwithstanding the agreement by the member councils to pool 100% of their net CIL receipts, it is recognised by the member councils that the IL's agreed by the member councils may contain infrastructure projects which are of greater importance to one member council, notwithstanding that but the project is of benefit to the JCS area as a whole. There may from time to time be exceptional circumstances where specific infrastructure is identified as a new priority for one or more councils. Where this occurs, this will be presented to the Joint Committee for consideration.

3.4 Any member council that considers it is no longer appropriate for the member councils to pool 100% of their net CIL receipts shall be able to trigger a review of these terms of reference in accordance with the Governance section appearing herein below.

4 The Role of the Joint Committee

4.1 The Committee shall:

- Oversee the Strategic CIL application process and scrutinise each project bid for strategic fit and compliance with CIL requirements.
- Be accountable for the oversight, monitoring and governance of ~~awards~~ funding allocations.
- Take an objective and detached view of applications.

4.2 The first meeting of the Committee will be to agree the process for assessment of pipeline of projects for investment.

4.3 The CIL Officer Working Group shall be made up of appropriate officers of each CIL charging authority and Gloucestershire County Council and will report to the Committee.

4.4 The Working Group activities shall include:

- Making recommendations to the Committee
- Contract management where triggered
- Application revisions and extensions
- Financial updates
- Project delivery scrutiny
- Compliance with funding agreements

5 Governance

5.1 The Committee is a Joint Committee under s101(5) and s102 Local Government Act 1972 and under Part 1A Chapter 2 Section 9EB of the Local Government Act 2000 and pursuant to the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012.

5.2 The Committee will include Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council.

5.3 These Terms of Reference will be reviewed as a minimum every two years. An earlier review will be triggered by any key changes in policy and or legislation relating to CIL or by a member council wishing to review the proportion of net CIL receipts that the member councils pool pursuant to these Terms of Reference.

6 Host Authority

6.1 The Committee will be hosted under local government arrangements by Tewkesbury Borough Council with hosting arrangements reviewed every two years.

6.2 The host authority will provide Secretary/ Clerk, S151 and Monitoring Officer roles of the Committee. This time allocation will be funded from the 5% administration of CIL.

7 Membership

7.1 Each Council shall appoint a Committee Member and a substitute who shall be either the Leader or other appointed Executive Members. The quorate membership of the Committee will be three, made up of one Member from each council.

7.2 If a quorate meeting cannot be achieved, the meeting will be rearranged. Each Committee Member shall remain in office until removed or replaced by his or her appointing Council or, in the case of an Executive Committee Member, until he or she ceases to be a member of the Executive Committee.

8 Functions of the Committee

8.1 Each of the Councils, by establishing the Joint Committee, empowers the Committee to make decisions on bids for CIL monies in respect of sums received by its member Councils. The bids will be considered, and the monies allocated in a manner which is consistent with the infrastructure commitments contained with the annual IFS published by the councils, this includes the IL (including any interim assessments) and the Infrastructure Delivery Plan (being updated to support the emerging Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan). Allocation of funding will be made on a project-by-project basis, not per financial year.

8.2 The Committee will support and engage in such other additional functions as the respective Councils may determine from time to time including but not limited to:

1. Identifying the future strategic infrastructure and investment needs.
2. Providing an evidence base for spending decisions on strategic locally identified priorities.
3. Consulting with Gloucestershire County Council on proposals for CIL expenditure and to consider Gloucestershire County Council spending priorities (if any) for CIL expenditure.
4. Exploring other sources of funding and opportunities for match funding streams.
5. Determining the method for evaluating and scoring to rate each application submitted and review weighting for criteria.

6. Scrutinising full applications and project presentations including any special terms under which an award is made.
7. Monitoring the delivery of projects that have had funding allocations, including regular reporting from officers in relation to contract management and financial updates.
8. As and where necessary calling individual projects into account where Grant contract conditions trigger review.
9. Determining how any unallocated funds within the pooled fund should be treated.

9 Voting

9.1 One vote for each Council.

9.2 Normal rules as to declarations of interest shall be applied in accordance with the host authority's Code of Conduct

9.3 Decisions shall be made by full consensus vote.

10 Quorum

10.1 A representative from each Council must be present. No business shall be transacted at any meeting unless the quorum is reached. If quorum is not reached within 30 minutes of the start of the meeting (or if quorum ceases to be present during a meeting) the meeting shall be adjourned to the same time and venue to a date determined by the Chair.

11 Meetings

11.1 The Chair and Vice Chair of the meeting will be elected at the first meeting and then each Annual Meeting of the Committee and, if the Chair or Vice Chair is not present at any meeting within 10 minutes of the start of the meeting, those present will elect a Chair to act for that meeting.

11.2 The Chair and Vice Chair will be from different Councils.

11.3 Only a voting member is entitled to be elected as Chair or Vice Chair of the Committee.

11.4 Meetings will occur at least annually to agree Strategic CIL allocations. Other meetings may be required to respond to the programme of the additional functions. Meetings which make decisions on the allocation of CIL funding will be in public.

12 Constitution

12.1 The Constitution of the host authority shall apply to the Committee.

13 Attendance

13.1 Gloucestershire County Council shall be entitled to attend meetings of the Committee to input on matters relevant to the functions and activities of the Committee but shall have no voting rights nor be involved in scrutiny.

13.2 Each member Council may send appropriate officers to meetings of the Committee, or any Sub-Committee thereof, to support its Members.

14 Responsibilities of the Chair and Vice Chair

14.1 The role of the Chair is to ensure that the meetings of the Committee are conducted efficiently and effectively.

14.2 The role of the Vice Chair is to deputise for the Chair during any period of the Chair's absence, or at other times as appropriate, and their responsibilities shall be the same as those of the Chair.

15 Member Conduct

15.1 Members shall be subject to the Code of Conduct for Elected Members adopted by the Council that nominated them to be a Committee Member.

16 Scrutiny

16.1 The decisions made by the Committee shall be subject to the decisions being reported back through relevant Cabinet/Executive Committee of each of the member Councils.

16.2 Any decision by the Committee, except those agreed as urgent in accordance with these provisions, shall not be implemented until the member Councils have formally reported back through their own Cabinet/Executive Committee.

16.3 All decisions of the Committee (unless considered urgent) shall be subject to the "call in" process of each member Council. If not called in during that period any decision shall then be available for implementation.

16.4 Where the Committee decides that a decision is urgent it shall record the reasons for such urgency in the Minutes of the meeting and any subsequent "call in" of that decision should normally relate only to the process leading to the decision and not to the decision itself and the Chair of the member Council's Scrutiny Committee shall be advised immediately.

17 Liability of Members

17.1 Committee Members shall have the same responsibilities as those that apply when sitting on other committees and bodies as an appointed representative of their nominating Council.

Cheltenham, Gloucester and Tewkesbury

Community Infrastructure Levy Joint Committee

Terms of Reference

1 Introduction

1.1 Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council worked together to produce the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy (2017) (the JCS) as the overarching strategy to guide the development of their area as part of their Development Plan. The three councils (the member councils) have agreed to pool the receipts received from the Community Infrastructure Levy (CIL) with the aim of working together to achieve the objectives of their Development Plans.

1.2 To facilitate an open and transparent joint approach to the governance of the application of CIL receipts the member councils resolved to establish a joint committee. The Community Infrastructure Levy (CIL) Joint Committee was formally constituted under a decision made by the member councils at a full Council meeting for Cheltenham Borough Council on 11 December 2023, Gloucester City Council on 24 January 2024, and Tewkesbury Borough Council on 23 January 2024.

2 Purpose

2.1 The Community Infrastructure Levy Joint Committee (the "Committee") shall work jointly and collaboratively to advise the member Councils on CIL generally and make decisions on bids for CIL monies that have been pooled by the constituent Councils. The member Councils of the Committee are charging authorities for the purposes of the Community Infrastructure Levy Regulations 2010 (as amended) (the "CIL Regulations"). The Committee shall consider how community infrastructure levy (CIL) receipts should be spent to support the development of each of the Council's areas, in accordance with Regulations 59(1) and 59(3) of the CIL Regulations.

2.2 Regulation 59(1) of the CIL Regulations provides (1) that charging authority must apply CIL to funding the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of its area.

2.3 Regulation 59(3) of the CIL Regulations provides that a charging authority may apply CIL to funding the provision, improvement, replacement, operation or maintenance of infrastructure outside its area where to do so would support the development of its area.

2.4 The member councils believe that working together to pool CIL receipts for the development of infrastructure within their collective administrative areas will support the delivery of their shared objectives as set out in the statutory Development Plans and consequently will support development within their respective areas in accordance with Regulation 59(3) of the CIL regulations.

3 The Pooled Fund

Deleted: JCS

Deleted: have

Commented [SS1]: Cheltenham Borough Agenda for Council on Monday, 11th December, 2023, 2.30 pm - Modern Council
Gloucester City Agenda for Council on Thursday, 25th January 2024, 6.30 pm Gloucester City Council - Democracy
Tewkesbury 23 Jan 2024 Minutes - Tewkesbury Borough Council - Will insert the hyperlinks in the final version

Deleted: JCS

3.1 In recognition of the joint approach the member councils have agreed that their Infrastructure Funding Statements (IFS) and Infrastructure Lists (IL) identify infrastructure priorities that are consistent with the objectives of the Development Plans and their localities to support development across the Development Plan areas.

3.2 It is the intention of the member councils to pool 100% of the CIL receipts they receive net of any CIL receipts which are either passported to local councils or are allocated by the member councils to their individual neighbourhood CIL funds in accordance with Regulation 59A and 59F of the CIL regulations respectively.

3.3 Notwithstanding the agreement by the member councils to pool 100% of their net CIL receipts, it is recognised by the member councils that the IL's agreed by the member councils may contain infrastructure projects which are of greater importance to one member council, notwithstanding that but the project is of benefit to the JCS area as a whole. There may from time to time be exceptional circumstances where specific infrastructure is identified as a new priority for one or more councils. Where this occurs, this will be presented to the Joint Committee for consideration.

3.4 Any member council that considers it is no longer appropriate for the member councils to pool 100% of their net CIL receipts shall be able to trigger a review of these terms of reference in accordance with the Governance section appearing herein below.

4 The Role of the Joint Committee

4.1 The Committee shall:

- Oversee the Strategic CIL application process and scrutinise each project bid for strategic fit and compliance with CIL requirements.
- Be accountable for the oversight, monitoring and governance of funding allocations.
- Take an objective and detached view of applications.

4.2 The first meeting of the Committee will be to agree the process for assessment of pipeline of projects for investment.

4.3 The CIL Officer Working Group shall be made up of appropriate officers of each CIL charging authority and Gloucestershire County Council and will report to the Committee.

4.4 The Working Group activities shall include:

- Making recommendations to the Committee
- Contract management where triggered
- Application revisions and extensions
- Financial updates
- Project delivery scrutiny
- Compliance with funding agreements

5 Governance

5.1 The Committee is a Joint Committee under s101(5) and s102 Local Government Act 1972 and under Part 1A Chapter 2 Section 9EB of the Local Government Act 2000 and pursuant to the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012.

Deleted: which

Deleted: JCS

Deleted: JCS

Deleted: awards

Deleted: **Appendix 1** Cheltenham, Gloucester & Tewkesbury Community Infrastructure Levy Joint Committee: Terms of Reference **V3 November 2023**¶
¶
Page | 2

DRAFT

5.2 The Committee will include Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council.

5.3 These Terms of Reference will be reviewed as a minimum every two years. An earlier review will be triggered by any key changes in policy and or legislation relating to CIL or by a member council wishing to review the proportion of net CIL receipts that the member councils pool pursuant to these Terms of Reference.

6 Host Authority

6.1 The Committee will be hosted under local government arrangements by Tewkesbury Borough Council with hosting arrangements reviewed every two years.

6.2 The host authority will provide Secretary/ Clerk, S151 and Monitoring Officer roles of the Committee. This time allocation will be funded from the 5% administration of CIL.

7 Membership

7.1 Each Council shall appoint a Committee Member and a substitute who shall be either the Leader or other appointed Executive Members. The quorate membership of the Committee will be three, made up of one Member from each council.

7.2 If a quorate meeting cannot be achieved, the meeting will be rearranged. Each Committee Member shall remain in office until removed or replaced by his or her appointing Council or, in the case of an Executive Committee Member, until he or she ceases to be a member of the Executive Committee.

8 Functions of the Committee

8.1 Each of the Councils, by establishing the Joint Committee, empowers the Committee to make decisions on bids for CIL monies in respect of sums received by its member Councils. The bids will be considered, and the monies allocated in a manner which is consistent with the infrastructure commitments contained with the annual IFS published by the councils, this includes the IL (including any interim assessments) and the Infrastructure Delivery Plan (being updated to support the emerging Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan). Allocation of funding will be made on a project-by-project basis, not per financial year.

8.2 The Committee will support and engage in such other additional functions as the respective Councils may determine from time to time including but not limited to:

1. Identifying the future strategic infrastructure and investment needs.
2. Providing an evidence base for spending decisions on strategic locally identified priorities.
3. Consulting with Gloucestershire County Council on proposals for CIL expenditure and to consider Gloucestershire County Council spending priorities (if any) for CIL expenditure.
4. Exploring other sources of funding and opportunities for match funding streams.
5. Determining the method for evaluating and scoring to rate each application submitted and review weighting for criteria.
6. Scrutinising full applications and project presentations including any special terms under which an award is made.
7. Monitoring the delivery of projects that have had funding allocations, including regular reporting from officers in relation to contract management and financial updates.
8. As and where necessary calling individual projects into account where Grant contract conditions trigger review.
9. Determining how any unallocated funds within the pooled fund should be treated.

Deleted: **Appendix 1** Cheltenham, Gloucester & Tewkesbury Community Infrastructure Levy Joint Committee: Terms of Reference **V3 November 2023**¶
¶
Page | 3

9 Voting

9.1 One vote for each Council.

9.2 Normal rules as to declarations of interest shall be applied in accordance with the host authority's Code of Conduct

9.3 Decisions shall be made by full consensus vote.

10 Quorum

10.1 A representative from each Council must be present. No business shall be transacted at any meeting unless the quorum is reached. If quorum is not reached within 30 minutes of the start of the meeting (or if quorum ceases to be present during a meeting) the meeting shall be adjourned to the same time and venue to a date determined by the Chair.

11 Meetings

11.1 The Chair and Vice Chair of the meeting will be elected at the first meeting and then each Annual Meeting of the Committee and, if the Chair or Vice Chair is not present at any meeting within 10 minutes of the start of the meeting, those present will elect a Chair to act for that meeting.

11.2 The Chair and Vice Chair will be from different Councils.

11.3 Only a voting member is entitled to be elected as Chair or Vice Chair of the Committee.

11.4 Meetings will occur at least annually to agree Strategic CIL allocations. Other meetings may be required to respond to the programme of the additional functions. Meetings which make decisions on the allocation of CIL funding will be in public.

12 Constitution

12.1 The Constitution of the host authority shall apply to the Committee.

13 Attendance

13.1 Gloucestershire County Council shall be entitled to attend meetings of the Committee to input on matters relevant to the functions and activities of the Committee but shall have no voting rights nor be involved in scrutiny.

13.2 Each member Council may send appropriate officers to meetings of the Committee, or any Sub-Committee thereof, to support its Members.

14 Responsibilities of the Chair and Vice Chair

14.1 The role of the Chair is to ensure that the meetings of the Committee are conducted efficiently and effectively.

14.2 The role of the Vice Chair is to deputise for the Chair during any period of the Chair's absence, or at other times as appropriate, and their responsibilities shall be the same as those of the Chair.

15 Member Conduct

15.1 Members shall be subject to the Code of Conduct for Elected Members adopted by the Council that nominated them to be a Committee Member.

Deleted: **Appendix 1** Cheltenham, Gloucester & Tewkesbury Community Infrastructure Levy Joint Committee: Terms of Reference **V3 November 2023**¶
¶
Page | 4

DRAFT

16 Scrutiny

16.1 The decisions made by the Committee shall be subject to the decisions being reported back through relevant Cabinet/Executive Committee of each of the member Councils.

16.2 Any decision by the Committee, except those agreed as urgent in accordance with these provisions, shall not be implemented until the member Councils have formally reported back through their own Cabinet/Executive Committee.

16.3 All decisions of the Committee (unless considered urgent) shall be subject to the "call in" process of each member Council. If not called in during that period any decision shall then be available for implementation.

16.4 Where the Committee decides that a decision is urgent it shall record the reasons for such urgency in the Minutes of the meeting and any subsequent "call in" of that decision should normally relate only to the process leading to the decision and not to the decision itself and the Chair of the member Council's Scrutiny Committee shall be advised immediately.

17 Liability of Members

17.1 Committee Members shall have the same responsibilities as those that apply when sitting on other committees and bodies as an appointed representative of their nominating Council.

DRAFT

Deleted: **Appendix 1** Cheltenham, Gloucester & Tewkesbury Community Infrastructure Levy Joint Committee: Terms of Reference **V3 November 2023**¶
¶
Page | 5

This page is intentionally left blank

Cheltenham Borough Council

Cabinet – 18 November 2025

Notification of decisions made by the Community Infrastructure Levy Joint Committee

Accountable member:

Cllr Rowena Hay – Leader

Accountable officer:

Tracey Birkinshaw – Director Planning & Building Control

Ward(s) affected:

All

Key Decision: No

Executive summary:

The Community Infrastructure Levy (CIL) Joint Committee (CIL Joint Committee) met on 25 September 2025 to consider and make decisions on the allocation of funding for infrastructure projects. This report fulfils the requirements of the CIL Joint Committee Terms of Reference (ToRs).

This report relates only to the 'Infrastructure Fund' portion of CIL receipts specifically.

The CIL Joint Committee date was brought forward at short notice to make decisions on an urgent matter relating to supporting Gloucestershire County Council in identifying opportunities to contribute to closing the funding gap to support the submission of information to Ministry of Housing Communities and Local Government in connection with the Homes England Housing Infrastructure Fund that the County Council had secured for the project.

This CIL Joint Committee considered the availability of CIL Regulation 59(1) CIL receipts paid between the 6 February 2025 and 26 August 2025 and focused on the additional amount available to allocate from the 75% share of the Strategic Infrastructure Fund. In addition, it considered a recommendation to commit to allocating up to £20 million of CIL receipts from the pooled CIL Regulation 59(1)

Infrastructure fund to support the M5 Junction 10 scheme, and the likelihood of this share generating sufficient income to support this within the required timescale.

Decisions were made to:

- Allocate the available unallocated pooled CIL regulation 59(1) Infrastructure fund receipts to the M5 Junction 10 project.
- Commit to the principle of allocating up to £20 million (inclusive of the allocated amount) to support the project in the future, and
- Keep the current split of the Infrastructure Fund as currently agreed so that 25% is retained to support local strategic infrastructure projects, yet recognising the need to keep this under review.

Recommendation: That Cabinet

1. notes the decisions of the Community Infrastructure Levy (CIL) Joint Committee made on 25 September 2025. (see Appendix 6)

---

1. Implications

1.1 Financial, Property and Asset implications

The CIL Joint Committee allocation decisions relate to the CIL Infrastructure Fund receipts of all the member councils; however, Cheltenham Borough Council's financial commitments only relate to the CIL payments received by it that are held by Cheltenham Borough Council relating to the CIL Reg 59(1) Infrastructure Fund portion of CIL receipts it receives. The payment of up to 15% capped to (Parish Councils) or up to 15% capped for the Neighbourhood Fund for unparished areas and up to 5% towards administration cost of collecting the levy being unaffected.

In allocating the reported available Cheltenham Borough Council CIL receipts agreed from the 75% strategic infrastructure fund proportion amount of paid CIL receipts unallocated paid up to 26 August 2025 to the M5 Junction 10 Project Cheltenham Council has made a commitment to make its allocated sum available for payment to Gloucestershire County Council in accordance with the terms of the relevant funding agreement that will be completed by all three member councils of the CIL Joint Committee, to be paid at the time it is required for payment.

Gloucestershire County Council has already indicated that it will require the additional £4,448,369.66 (and thus the £1,621,854.36 that is Cheltenham Borough Council's proportion) to be transferred to it before 2025/26 financial year end. Cheltenham Borough Council will need to ensure that it has the funds available to meet the payment date committed too in the completed funding agreement.

The CIL Joint Committee can only make decisions on the allocation of CIL receipts that have been paid to its member councils, therefore future CIL Joint Committee meetings will need to consider future funding allocations. The next meeting is currently organised for 04 February 2026 so could potentially also commit to future funding payments within this financial year.

The decision of the CIL Joint Committee on 25 September 2025 will now leave Cheltenham Borough Council with £0.00 in the 75% strategic infrastructure fund share and £1,442,497.17 unallocated in the 25% local strategic infrastructure fund projects share (see T*able 5 in Appendix 1 of the 25 September CIL Joint Committee Report*), plus any other CIL receipts paid since the date of the data in the CIL Joint Committee report, that will subsequently be allocated to the CIL Reg 59(1) Infrastructure Fund and split 75% / 25% for consideration at a future date for allocation to projects.

The Community Infrastructure Levy is allocated for specific purposes, and it is not at the discretion of this Council to decide to use it for an alternative purpose. Although the inflow will have a positive impact on the Council's cash flow position, there should be no impact on the revenue or capital budget unless a situation occurs where the funds are not available to be paid at the required time, and thus the Council may need to borrow to cover any payment agreed in the funding agreement at the required time.

Any implications for the property portfolio will be funding for some projects which have previously paused due to budget shortfalls.

Signed off by: Jon Whitlock, Director of Finance & Assets & Deputy Section 151 Officer jon.whitlock@cheltenham.gov.uk

1.2 Legal implications

The "strategic" element of CIL receipts (being otherwise than up to 5% for administration and the 15% (capped) to 25% neighbourhood portion) must be spent on 'infrastructure' (Regulation 59). Charging authorities can choose to pool a proportion of their Community Infrastructure Levy receipts to fund infrastructure including for out of their own area spending. Each of the charging authorities included in the pooling arrangements should be content that funding for infrastructure outside the authority's area will support development of its own area.

The Joint Committee's Terms of Reference sets out how the pooled levy will be administered and spent.

As set out in the agreed Terms of Reference for the Joint Committee (See Appendix 3) any allocation decisions require a full consensus vote of the Committee. Further, the decisions made by the Joint Committee shall be subject to the decisions being reported back through relevant Cabinet/Executive Committee of each of the member

Councils. Any decision by the Joint Committee, except those agreed as urgent, shall not be implemented until the member Councils have formally reported back through their own Cabinet/Executive Committee. All decisions of the Joint Committee (unless considered urgent) shall be subject to the “call in” process of each member Council. If not called in during that period any decision shall then be available for implementation.

Further Legal Implications in respect of the decisions made by the Joint Committee are set out in the 25 September 2025 CIL Joint Committee report (See Appendix 5).

Signed off by: Charlotte Lockwood (Locum Senior Lawyer, OneLegal (legalservices@onelegal.org.uk)

1.3 Environmental and climate change implications

The Climate Change Impact Tool was a requirement for each CIL scheme submitted for assessment. Some of the projects supported for the allocation of CIL funding will contribute towards delivering against the respective councils’ carbon emergency aspirations. Each submitted scheme was assessed against sustainability criteria through the applied scoring matrix.

Signed off by: Maizy McCann, Climate Officer
Maizy.McCann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

Key priority 1: Securing our future
Key priority 3: Reducing carbon, achieving council net zero, creating biodiversity
Key priority 4: Reducing inequalities, supporting better outcomes
Key priority 5: Taking care of your money

1.5 Equality, Diversity and Inclusion Implications

See Appendix 2. Some of the projects are likely to be subject to their own separate Equalities Impact Assessment in due course (where these have not already been completed) and as appropriate this will be considered by the CIL Joint Committee.

1.6 Performance management – monitoring and review

Schemes that have been allocated funding will be awarded funding via a grant agreement. These agreements will be monitored via the CIL Officer Working Group and the Strategic Infrastructure Planning Manager and reported to the CIL Joint Committee.

2 Background

2.1 On 11 December 2023, Council approved the establishment of a Community Infrastructure Levy Joint Committee under s101(5) and s102 Local Government Act 1972 and under Part 1A Chapter 2 Section 9EB of the Local Government Act 2000 and pursuant to the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012. The decision to establish the CIL Joint Committee was also approved by the two other partner authorities of Gloucester City Council (25 January 2024) and Tewkesbury Borough Council (23 January 2024).

2.2 At the same meeting approval was given for:

- The Community Infrastructure Levy Joint Committee 'Terms of Reference' (see Appendix 3).
- The pooling of strategic infrastructure CIL monies by the three partner Councils of Cheltenham Borough, Gloucester City and Tewkesbury Borough; and
- Engagement with wider infrastructure providers, outside the local authorities, should be entered into.

2.3 The CIL Joint Committee is the decision maker subject to the decisions being reported back through relevant Cabinet/Executive Committee of each of the member Councils. All decisions of the Committee (unless considered urgent) shall be subject to the "call in" process of each member Council. If not called in during that period any decision shall then be available for implementation. This is the basis of this report to Cabinet.

2.4 The strategic CIL receipts, which the Councils have named the Infrastructure Fund is the 70% to 80% of receipts that remain, once administration costs and neighbourhood funding has been deducted, that each Council, as an individual CIL Charging and Collection Authority, has collected and pooled together. At the CIL Joint Committee Meeting 4 March 2025 a decision was made to split the CIL Infrastructure Fund so that 75% of the Infrastructure Fund receipts are allocated to 'strategic infrastructure' projects and 25% to be ringfenced for allocation to 'local strategic infrastructure' projects.

2.5 This paper and the governance provided by the Joint Committee relate primarily to the larger strategic 'Infrastructure Fund' portion of CIL receipts. More specifically the seventy-five percent share of this which the Joint CIL Committee has decided to ringfence (as reported to Cabinet on 9 April 2025) for use on 'strategic infrastructure' projects and the amount of this as unallocated, available to be allocated against the CIL the Infrastructure Fund

receipts on 26 August 2025 and potential CIL receipts into this share of the Infrastructure Fund.

2.6 Cllr Declan Wilson acted as appointed substitute voting member for Gloucester City Council for this CIL Joint Committee meeting on 25 September 2025. This was approved by the Monitoring Officer.

The strategic Infrastructure Fund

2.7 The CIL Joint Committee was presented with an updated position associated with the total of unallocated CIL Receipts on 26 August 2025 in the CIL Regulation 59(1) Infrastructure Fund and how this was split between its previously agreed 75% for strategic infrastructure projects and 25% for Local Strategic Infrastructure Projects (see Table in **Appendix 6**). It was also presented with the following additional indicative data:

1. In respect of potential anticipated CIL Infrastructure Fund receipts associated with current CIL Demand Notices issued with unpaid instalments as position on 3 September 2025 which include CIL instalment payments up to mid-March 2027,

2. Potential future CIL receipts into the CIL Reg 59(1) Infrastructure Fund that could become payable as a result of the implementation of developments that already have a CIL liability notice issued against them, and

3. Potential future CIL receipts for the CIL Regulation 59(1) Infrastructure Fund that that may potentially trigger CIL Demand being raised and thus CIL payments up to 2030 calculated using Housing Monitoring data.

2.8 The purpose of all this data was to provide evidence as to the likelihood of the 75% strategic infrastructure portion having available sufficient funds to cover the £20 million that Gloucestershire County Council were requesting as an additional commitment from CIL receipts to support the closing of the £110 million funding gap for the M5 Junction 10 project it had reported to its Cabinet on 17 September 2025.

2.9 The decisions of CIL Joint Committee are set out in Appendix 6 of this report.

2.10 The decision to allocate the £4,448,369.66 of unallocated pooled CIL Receipts in the CIL Reg 59(1) Infrastructure Fund 75% share to the M5 Junction 10 project as the first amount toward that £20 million commitment results in the following commitment by each of the member Councils of the CIL Joint Committee as set out in Table 5 in Appendix 1 of the CIL Joint Committee 2025 Report as repeated below:

CIL Charging Authority	75% CIL Strategic Infrastructure Fund (£)	25% CIL Local Strategic Infrastructure Fund (£)
Cheltenham Borough Council	£1,621,854.36	£1,442,497.17
Gloucester City Council	£298,512.11	£99,504.04
Tewkesbury Borough Council	£2,528,003.19	£3,724,297.68
Totals (£)	**£4,448,369.66**	***£5,266,298.89***

3 Reasons for recommendations

3.1 The purpose of this report is not to debate the decisions of the CIL Joint Committee, but to note the allocation decisions made and facilitate the scrutiny provisions.

3.2 The CIL Joint Committee is a fully constituted Committee. The Joint CIL Committee Terms of Reference require the reporting of its decisions to the Executive / Cabinet as relevant for each of the CIL authorities prior to the implementation of decisions it has made. The decisions of the CIL Joint Committee are subject to each member council scrutiny provisions.

4 Alternative options considered

4.1 None. The Terms of Reference require each partners council of the CIL Joint Committee to report back through their relevant constitutional arrangements.

5 Consultation and feedback

5.1 Not relevant for the purposes of this report.

6 Key risks

6.1 See **Appendix 1**.

Report author:

Sarah Screen, Strategic Infrastructure Planning Manager, for the councils of Cheltenham Borough, Gloucester City and Tewkesbury Borough.
sarah.screen@tewkesbury.gov.uk 01684 272143

Appendices:

1. Risk Assessment

2. Equality Impact Assessment – Screening
3. Community Infrastructure Levy Joint Committee – Terms of Reference
4. Community Infrastructure Joint Committee, 14 July 2025 – Agenda Papers
5. CIL Joint Committee 25 September 2025 Agenda Reports pack
6. CIL Joint Committee 25 September 2025 Decisions

Background information:

1. Cheltenham Borough Council Corporate Plan Update – Council 21st July 2025
2. Gloucestershire County Council Cabinet 17 September 2025 Item 8 page 161 (specific p 173)

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1	If the partner councils do not report the decisions of the CIL Joint Committee through their relevant Cabinet/Committee processes, then the funding allocated cannot be drawn down in funding agreements	CIL Joint Committee	4	1	4	Accept	Each partner council reports the decisions as required through its own constitutional arrangements	Director Planning & Building Control	Cabinet meeting 18 November 2025 *(12 November 2025 Cabinet for Gloucester City Council and 19 Novembe 2025 Executive Tewkesbu Borough Council)*

Appendix 2: Equality Impact Assessment (Screening)

1. Identify the policy, project, function, or service change

a. Person responsible for this Equality Impact Assessment	
Officer responsible: Sarah Screen	Service Area: Planning
Title: Strategic Infrastructure Planning Manager (on behalf of Director Communities and Economic Development)	Date of assessment: 15 October 2025
Signature: *Sarah Screen*	

b. Is this a policy, function, strategy, service change or project?	Function
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
Community Infrastructure Levy Regulations 2010 (as amended)	
Is this new or existing?	**Other**
Please specify reason for change or development of policy, function, strategy, service change or project	
No change. The report facilitates compliance with the CIL Joint Committee Terms of Reference	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	To comply with the CIL Joint Committee Terms of Reference
Objectives:	To allocate CIL Strategic Infrastructure funding through a full and transparent assessment

Outcomes:	Decision making within the context of the CIL Joint Committee Terms of Reference.
Benefits:	The communities, businesses and visitors across Cheltenham, Gloucester, and Tewkesbury.

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Positive**
Please provide an explanation for your answer:	
CIL monies are collected under the CIL Regulations to help support development through funding relevant infrastructure. CIL awards will be monitored via the CIL Joint Committee.	

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate	
Stage Two required	**No**
Owner of Stage Two assessment	
Completion date for Stage Two assessment	

Appendix 6
CIL Joint Committee 25 September 2025 Decisions

1. The unallocated £4,448,369.66 held within the current 75% portion of the Infrastructure Fund be allocated and funding agreement entered into with Gloucestershire County Council to support the delivery of M5 Junction 10 scheme.

2. Future CIL income from the 75% portion of the Infrastructure Fund be ringfenced for allocation to Gloucestershire County Council to support the delivery of M5 Junction 10 scheme up to a maximum of £20m (including the £4,448,369.66 set out above) with specific allocations of any such sums being brought back to future meetings of the CIL Joint Committee for consideration.

3. Regular monitoring will be reported to the CIL Joint Committee and should the 75% portion of the Infrastructure Fund not reach the anticipated levels within the report further consideration will be given as regards the portion of Infrastructure Fund currently ringfenced for allocation to local strategic infrastructure projects

The above CIL receipts allocation decisions were informed by CIL Joint Committee 25 September 2025 Appendix 1 Table 4:

Total Pooled CIL Reg 59(1) Infrastructure Fund Received to 26 August 2025 reflecting allocation status under the agreed 75% Strate Infrastructure Project to 25% Local Strategic Infrastructure Project Split

	Total Pooled CIL Infrastructure Fund Received to 26.08.2025	**Total pooled CIL Infrastructure Fund allocated to 26.08.2025**	**Total Pooled CIL Infrastructure Fund unallocated to 26.08.2025**
75% Strategic infrastructure Fund (£)	£18,211,649.47	£13,763,279.81	£4,448,369.66
25% Local Strategic Infrastructure Fund	£6,070,549.82	£804,250.94	**£5,266,298.89
	£24,282,199.29	**£14,567,530.74**	**£9,714,668.55**

**The 25% of the CIL Reg 59(1) Infrastructure Fund unallocated to 26 August 2025 date is a larger financial value because a significant amount of this share of the fund from receipts up to 05 February 2025 having not previously been allocated to projects by the CIL Joint Committee.

Cheltenham Borough Council

Cabinet – 18 November 2025

Review of Statement of Licensing Policy (Licensing Act 2003)

Accountable member:

Councillor Victoria Atherstone, Cabinet Member for Safety and Communities

Accountable officer:

Michelle Bignell, Licensing and Public Protection Manager

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

Section 5 of the Licensing Act 2003 requires the Council to review, determine and publish its Licensing Act 2003 Policy Statement every five years.

The current policy statement was adopted by Council in December 2020. A review of the current policy statement has been undertaken as outlined in this report.

Consultation has been undertaken, and this report provides Cabinet with opportunity to consider the feedback, approve the revised policy, subject to any changes made, and recommend to Council adoption of the revised licensing statement.

Recommendations:

Cabinet is recommended to:

1. **Note the consultation feedback and officer comments; and**
2. **Approve the revised licensing policy statement at Appendix 2; and**
3. **Recommend to Council adoption of the revised licensing policy statement.**

1. Implications

1.1 Financial, Property and Asset implications

There are no financial implications arising from this report.

Signed off by: Ela Jankowska – Finance Business Partner **Date:** 27.10.2025

1.2 Legal implications

The Licensing Act 2003 came into force on 24 November 2005 and transferred the responsibility for licensing premises and persons selling alcohol from the courts to local authorities.

A requirement of the legislation is that all local authorities (or Licensing Authorities as they are known under the Act) must draft, consult on and publish a 'Statement of Licensing Policy'. The Statement of Licensing Policy must have regard to the content of a set of guidance notes published by the Secretary of State.

The Act requires each Council to review its Statement of Licensing Policy whenever necessary and, in any case, every five years.

Signed off by: One Legal, legalservices@onelegal.org.uk **Date:** 23.10.2025

1.3 Environmental and climate change implications

There are no associated climate/environmental implications from this report.

Signed off by: Maizy McCann, Climate Officer, Maizy.mccann@cheltenham.gov.uk **Date:** 29.10.2025

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity
- Being a more modern, efficient and financially sustainable council

1.5 Equality, Diversity and Inclusion Implications

As outlined in Appendix 5 of this report.

1.6 Performance management – monitoring and review

Through normal service delivery.

2 Background

2.1 Section 5 of the Licensing Act 2003 ("2003 Act") requires the Council to review, determine and

publish its Licensing Act 2003 Policy Statement ("policy statement") every five years.

2.2 The Council's current policy was adopted in 2020 after a full consultation.

2.3 Statutory delegation states that it sits with Full Council to adopt the final policy.

3 The Licensing Act 2003

3.1 The 2003 Act is the primary legislation that deals with the licensing requirements relating to:

a) the sale by retail of alcohol,
b) the supply of alcohol by or on behalf of a club to, or to the order of a member of the club,
c) the provision of regulated entertainment, and
d) the provision of late-night refreshment.

3.2 The licensable activities listed above are authorised through the issue of:

a) a premises licence; or
b) a club premises certificate; or
c) a temporary event notice.

3.3 The council is obligated to promote the four licensing objectives when discharging its functions under the 2003 Act including setting policy. The licensing objectives are:

a) the prevention of crime and disorder;
b) public safety;
c) the prevention of public nuisance; and
d) the protection of children from harm.

4 The Policy Statement

4.1 The draft proposed policy statement is attached at Appendix 2 of this report.

4.2 The policy statement sets out the principles the Council will apply when determining applications under the 2003 Act for up to the next five years. It also provides guidance to licence holders and applicants on how to make an application and advises them how the Council will determine applications.

4.3 The draft amended policy reflects changes in primary legislation, case law and national guidance. Changes to the policy also draw from the Council's experience since the 2003 Act was implemented.

4.4 There is recognition that the trade in alcohol has benefits for the town particularly in relation to the economic contribution made through, for example, a vibrant and popular night-time economy that draws thousands of people on most nights and investment in the town by businesses selling alcohol.

4.5 This policy statement sits alongside the work that the ENTE (Evening and Night-Time Economy) working group is conducting and there is an aspiration to implement a Charter for businesses to sign up to demonstrating their commitment to providing safe spaces for all. This work also supports the work that we do to maintain our Purple Flag accreditation which recognises our thriving and safe town.

5 Policy amendments

5.1 Since the last statement of policy review, there have been no significant changes to the national statutory guidance, primary legislation or case law that would substantially affect the policy. Consequently, there are no significant changes proposed as part of this policy review.

5.2 Aside from general tidying up and general updates, the following notable changes are proposed:

- Additional information on personal licences and annual fees
- Women's safety and wider vulnerability section
- Inclusion of ENTE Charter and reference to Purple Flag accreditation

5.3 Before publishing, the document will be formatted in accordance with accessibility guidelines and the contents page updated.

6 Statutory Guidance (February 2025)

6.1 Section 4 of the 2003 Act states that, in carrying out its functions, the Council must 'have regard to' guidance issued by the Secretary of State under section 182.

6.2 The current guidance is referenced in the background information section of this report.

7 Consultation

7.1 Section 5(3) of the 2003 Act stipulates the statutory consultees the Council must consult with when determining its policy statement. These are the chief officer of police, the fire authority, the representatives of premises and personal licence holders and club registration certificates as it sees fit, and other persons that are seen to represent businesses and residents in the area.

7.2 A list of consultees is outlined in Appendix A of the revised policy.

7.3 During the consultation period, there were 7 responses. These are attached at Appendix 4 including officer response. The relevant policy changes have been incorporated in the revised draft policy document for approval and recommendation for adoption attached at Appendix 2.

8 Alternative options considered

8.1 The Council can resolve not to adopt the revised policy statement. However, this option would result in the Council failing to comply with its duty and function under the 2003 Act.

8.2 Alternatively, the Council can resolve to readopt its current policy without change but this is likely to result in the Council being unable to effectively discharge its licensing function under the 2003 Act.

9 Key risks

9.1 As outlined in Appendix 1.

Report author:

Michelle Bignell, Licensing and Public Protection Manager michelle.bignell@cheltenham.gov.uk

Appendices:

i. Risk Assessment
ii. Draft policy for adoption
iii. Review feedback
iv. Equality Impact Assessment

Background information:

1. Licensing Act 2003

2. Revised Guidance issued under section 182 of the Licensing Act 2003 (February 2025)
3. Cheltenham Borough Council's Licensing Act 2003 Licensing Policy Statement Approved by Council, 1 Dec 2020

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	There is a risk that the council may not be able to properly regulate activities under the Act if it fails to adopt the revised policy.	Head of Public Protection	3	2	6	Approve	Approve revised policy for adoption.	Licensing and Public Protection Manager	To be adopted at December Full Council
	The review and adoption of this policy is a statutory requirement, if the Council does not adopt a revised policy statement it will be failing in this duty and might face legal challenge from licence holders, responsible authorities and/or the wider public.	Head of Public Protection	3	2	6	Approve	Approve revised policy for adoption.	Licensing and Public Protection Manager	To be adopted at Decembe Full Cour

This page is intentionally left blank

Licensing Act 2003

Licensing Policy Statement





All enquiries should be directed to:

Licensing Section
Municipal Offices
Promenade
CHELTENHAM
GL50 9SA
Tel: 01242 264135
E-mail: licensing@cheltenham.gov.uk
Website: www.cheltenham.gov.uk

This Policy was approved December 20250.

LA2003 Policy Index

Contents

Draft LA2003 Policy Index 2
Policy Vision Statement 4
1. Introduction 5
Licensing Principles and Process 6
Scope 7
Licensing Objectives 7
Consultation 8
Duration and Review 8
Promotion of equality 8
2. The Borough of Cheltenham 9
The Area 9
Demography 9
3. Licensing Process - Making an Application 10
Premises Licences & Club Premises Certificates 10
The Operating Schedule 10
Guidance on Operating Schedule 11
a) Crime and Disorder 11
b) Public Safety 12
c) Public Nuisance 13
d) Protection of Children from Harm 15
Plans 16
4. Determination of Applications 17
Decision Making Process 17
Decisions on licensing matters will be taken in accordance with an approved scheme of delegation below: 17
Matters to be dealt with 17
Full Committee 17
Sub Committee 17
Officers 17
Unopposed Applications 18
Opposed Applications 18
Representations 18
Appeals 19
5. Temporary Event Notices (TENs) 20
Encouraging diversity in the night-time economy that is less focused on alcohol 27
Designated area of concern 27
Joint Core Strategy and other planning policies 28
Public Spaces Protection Order (PSPO) 28
Management of Licensed Premises 28
Promoting safe drinking limits 37
Shops Selling Alcohol (Off Licences) 38
Late night refreshment exemptions based on designated locations, premises types and times 39
7. Film Classifications 39
8. Events on Council Land 41
9. Enforcement 42
Reviews 42

Appendix A –Consultees 44
Appendix B – Responsible Authorities..... 45
Appendix C – Pool of Model Conditions 48
Appendix D – Designated Area of Concern 62

Policy Vision Statement

We want Cheltenham to be a safe and clean town that offers a greater diversity in the night-time economy that is less focused on alcohol and protects the quality of life for residents.

1. Introduction

1.1 This Licensing Policy Statement ("policy") has been produced in accordance with the requirements of the Licensing Act 2003 ("the Act") and is in line with guidance issued under Section 182 of the Act. Section 5 (as amended) of the Act requires Cheltenham Borough Council ("the authority"), acting in its capacity as the Licensing Authority to prepare and publish a statement of its licensing policy at least every five years.

1.2 This policy was last reviewed in 20~~14~~. In determining the policy the authority has taken into consideration any comments made by consultees. The authority has also taken into consideration the statutory guidance, changes in legislation and the experience of administering and enforcing the Act since its introduction.

1.3 The main purpose of this policy is to provide clarity to applicants, responsible authorities, elected Members and other persons on how the authority will determine applications for the sale/supply of alcohol, the provision of regulated entertainment and the provision of late-night refreshment and also to provide a basis for all licensing decisions taken by the authority over the next five years. It will also inform elected Members of the Licensing Committee the parameters within which licensing decisions can be made.

1.4 An effective licensing policy, alongside other initiatives, will work towards promoting the positive aspects of deregulation under the Act, such as promoting tourism, increasing leisure provision and encouraging the regeneration of the town centre as well as controlling the negative impacts such as increase in noise, nuisance, anti-social behaviour and crime and disorder.

1.5 Other matters also taken into account in formulating this policy:

a) Cheltenham Borough Council's corporate strategy and outcomes.
b) Local planning policy in particular the Joint Core Strategy ~~and Local Plan~~ and the Local Development Scheme ~~Cheltenham Plan~~.
c) Gloucestershire's Police and Crime Prevention Plan.
d) Section 182 statutory guidance.

1.6 Licensing law is not the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from licensed premises and, therefore, beyond the direct control of the individual licensees. There are a range of mechanisms including:

a) Planning controls;
b) Positive measures to create a safe and clean town centre environment in partnership with local businesses, transport operators and other departments of the local authority, including the provision of Closed Circuit Television (CCTV);
c) Police enforcement of the general law concerning disorder and anti social behaviour, including the issuing of fixed penalty notices.
d) The prosecution of any personal licence holder or member of staff at such premises who is selling alcohol to people who are drunk;

e) The confiscation of alcohol from adults and children in designated areas;
f) Police powers to close down instantly for up to 24 hours any licensed premises or temporary event on grounds of disorder, the likelihood of disorder or noise emanating from the premises causing a nuisance; and
g) The power to seek a review of the licence or certificate in question.

1.7 It should be understood that this policy and the statutory guidance cannot anticipate every scenario or set of circumstances that may arise and as such there may be circumstances where the policy or guidance may be departed from in the interests of the promotion of the licensing objectives and where it is deemed appropriate to do so. In such cases the authority will give full reasons for departing from this policy.

Licensing Principles and Process

1.8 This policy sets out the process the authority will adopt in dealing with licence applications with particular regard to the various types of premises and permissions and the various conditions that can be attached to licences if relevant representations are made. It also highlights the authority's undertaking to avoid duplication with other statutory provisions and its commitment to work in partnership with other enforcement agencies.

1.9 The authority is the Licensing Authority under the Act and is responsible for granting premises licences, club premises certificates, personal licences and administering temporary events notices in the borough.

1.10 The objective of this policy is to:

a) promote the four licensing objectives (see 1.16);
b) ensure that the premises are appropriate for their proposed use;
c) ensure the premises layout and condition is acceptable for the proposed use;
d) ensure that the premises are being managed responsibly; and
e) promote the Policy Vision Statement.

1.11 This policy also seeks to promote the authority's wider priorities, in particular that:

- Cheltenham has a clean and well-maintained environment;
- Cheltenham has a strong and sustainable economy;
- Communities feel safe and are safe;
- People are able to lead healthy lifestyles; and
- Our residents enjoy a strong sense of community and are involved in resolving local issues.

1.12 The authority's powers and duties as the licensing authority are delegated by Council to its licensing committee, sub-committees and officers. The authority approaches these delegations in accordance with the table of delegation set

out below or otherwise in accordance with the authority's adopted constitution.

1.13 The policy will be used as a basis in coming to consistent and transparent decisions in respect of licence applications.

1.14 The policy does not:

a) Undermine the right of any individual to apply for a variety of permissions and to have each application considered on its individual merits; or

b) Override the right of any person to make representations on an application, or seek a review of a licence or certificate, where the Act allows.

Scope

1.15 This policy relates to the licensable activities defined by section 1(1) of the Act, namely:-

a) retail sales of alcohol;
b) the supply of alcohol by or on behalf of a club;
c) the provision of regulated entertainment; and
d) the provision of late-night refreshment.

Licensing Objectives

1.16 The authority will carry out its licensing functions under the Act with a view to promoting the four licensing objectives, which are:

a) The prevention of crime and disorder;
b) Public safety;
c) The prevention of public nuisance; and
d) The protection of children from harm.

1.17 The aim of the licensing process is to regulate licensable activities so as to promote the licensing objectives.

1.18 In determining a licensing application, the overriding principle adopted by the authority will be that each application is determined on its merits. Licence conditions will be tailored to the individual application and only those necessary to promote the licensing objectives will be imposed.

1.19 The authority will also have regard to wider considerations affecting the residential population and the amenity of the area. These include littering, noise, street crime and the capacity of the infrastructure.

1.20 Each of the four objectives is of equal importance and will be considered in relation to matters centred on the premises or within the control of the licensee and the effect which the operation of that business has on the vicinity.

Consultation

1.21 In accordance with section 5 of the Act and prior to the publication of this Policy the Licensing Authority consulted with the persons and organisations stipulated in Appendix A of the policy.

Duration and Review

1.22 The policy takes effect 6 January 2026~~xx~~ and will remain in force for a period of no more than five years. During this time it will be subject to regular review and updating or modification as appropriate, for example to take account of any changes in licensing legislation.

Promotion of equality

1.23 The policy recognises that the Equality Act 2010 places a legal obligation on this authority to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations, between persons with different protected characteristics through the functions outlined in this policy. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

2. The Borough of Cheltenham

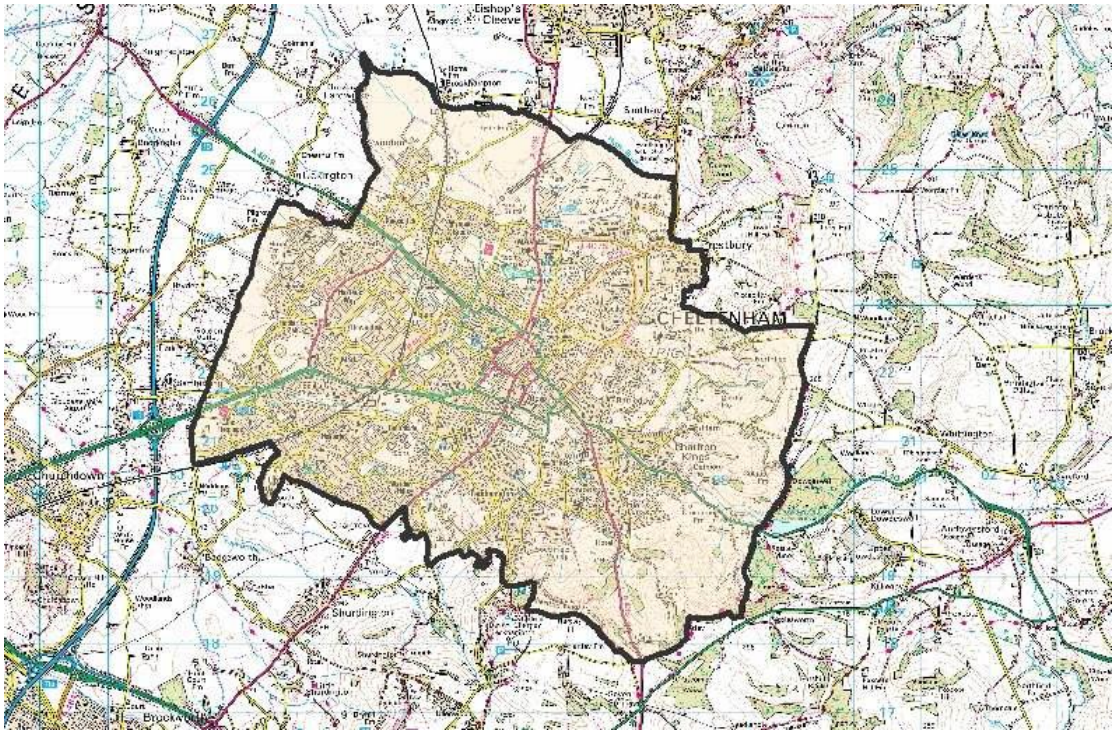
The Area

Until the late 1700s, Cheltenham was a small market town that became a fashionable resort after spa waters were discovered. Over the years it has attracted major employers and has gained a reputation for being an international festival town. This, together with its architectural heritage, educational facilities and quality environment, makes Cheltenham an attractive place to live, work and play.

The borough, which includes 5 parishes, has a population of approximately 1194,000 who live in 20 wards. The borough is mainly urban with some areas of surrounding countryside. It covers an area of approximately 4,680 hectares of which 17 % is designated as green belt and 22 % as an area of outstanding natural beauty.

Demography

The population is approximately 1194,000, and these figures will continue to rise over the next 20 years.



3. Licensing Process - Making an Application

Premises Licences & Club Premises Certificates

3.1 The relevant application forms and associated documents are obtainable from the authority's website at www.cheltenham.gov.uk/licensing or from the licensing section during normal office hours.

~~3.2~~ The authority offers pre-application advice for certain licence application types. Review the authority's pre-application advice.~~,~~

The Operating Schedule

~~3.3~~3.2 The operating schedule is a key document and, if prepared comprehensively, will form the basis on which premises can be licensed without the need for additional extensive conditions. The authority expects an operating schedule to indicate the steps that the applicant proposes to take to promote the licensing objectives.

~~3.4~~3.3 All applicants for the grant or variation of a premises licence or club premises certificate are required to provide an operating schedule as part of their application.

~~3.5~~3.4 Applicants are strongly recommended to discuss their operating schedules with the responsible authorities prior to submitting them.

~~3.6~~3.5 The complexity and detail required in the operating schedule will depend upon the nature and use of the premises. For premises such as a public house where public entertainment is not provided, only a relatively simple document will be required. For a major public entertainment venue it will be expected that issues such as public safety and crime and disorder will be addressed in detail.

~~3.7~~3.6 Applicants will also be expected to propose practical measures to prevent disturbance to local residents and to indicate what action will be taken to prevent or reduce noise emanating from the premises.

~~3.8~~3.7 The operating schedule must be on the prescribed form and include a statement of the following:

a) Full details of the licensable activities to be carried on at and the intended use of the premises;
b) The times during which the licensable activities will take place;
c) Any other times when the premises are to be open to the public;
d) Where the licence is only required for a limited period, that period;
e) Where the licensable activities include the supply of alcohol, the name and address of the individual to be specified as the designated premises supervisor;
f) Whether alcohol will be supplied for consumption on or off the premises or both; and

g) The steps which the applicant proposes to promote the licensing objectives.

Guidance on Operating Schedule

~~3.9~~3.8 The following guidance is intended to assist applicants by setting out criteria and considerations that they should bear in mind when drawing up an operating schedule. They alert applicants to any matters that responsible authorities are likely to consider when deciding whether to make representations on an application or whether to call for a review.

a) Crime and Disorder

~~3.10~~3.9 The promotion of the licensing objective, to prevent crime and disorder, places a responsibility on licence holders to become key partners in promoting this objective.

~~3.11~~3.10 Applicants will be expected to demonstrate in their operating schedule that suitable and sufficient measures have been identified and will be implemented and maintained to reduce or prevent crime and disorder on and in the vicinity of their premises, relevant to the individual style and characteristics of their premises and events.

Considerations

~~3.12~~3.11 When addressing the issue of crime and disorder, the applicant should demonstrate that those factors that impact on crime and disorder have been considered. These factors may include:

a) Underage drinking;
b) Drunkenness on premises;
c) Public drunkenness;
d) Drugs;
~~d)~~e) Hate crime
~~e)~~f) Violent or intimidating behaviour; and/or
~~f)~~g) Anti-social behaviour.

~~3.13~~3.12 In making their decision, regard should be given to the levels of crime and disorder in and around the venue, the level of compliance with conditions on existing licences and any available evidence on crime and disorder issues.

~~3.14~~3.13 Applicants are recommended to consult the Reducing Alcohol Related Violence Codes of Practice when considering their operating schedule.

~~3.15~~3.14 A pool of model conditions has been prepared and individuals preparing operating schedules are at liberty to use these conditions~~,~~ or volunteer any other measures(s) to promote the licensing objectives. Please see Appendix C for the pool of model conditions for the prevention of crime and disorder.

b) Public Safety

~~3.16~~3.15 The authority in its role as licensing authority must try to ensure the safety of people visiting and working in licensed premises. The authority will need to be satisfied that measures to promote public safety including risk assessments, setting safe capacities and adequate means of escape are put in place and maintained, if not adequately provided for by other regulatory regimes.

~~3.17~~3.16 Consideration should be given to whether:

a) appropriate and satisfactory general and technical risk assessments, management procedures and certificates have been made available to the relevant responsible authority and to the authority, that demonstrate that the public will be safe within and in the vicinity of the premises;

b) the premises already has a licence or a fire certificate that specifies the maximum number of people that can attend it or be present and, if not, whether a risk assessment has been undertaken to assess the maximum number of people in terms of capacity in various parts of the premises, so that they can be operated safely and can be evacuated safely in the event of an emergency;

c) there are procedures proposed to record and limit the number of people on the premises with opportunities for going outside and readmission;

d) patrons can arrive at and depart from the premises safely;

e) music, dance and performance venues will use equipment or special effects that may affect public safety (i.e. moving equipment, pyrotechnics, strobe lights, smoke machines);

f) there are defined responsibilities and procedures for medical and other emergencies and for calling the emergency services; and/or

g) the levels of compliance with conditions on existing licences relating to public safety.

~~3.18~~3.17 The authority seeks to encourage the use of toughened glassware and polycarbonate where appropriate in licensed premises. Where a relevant representation is received the authority will consider imposing a condition prohibiting the sale of alcohol in annealed glass containers and require the use of polycarbonate or other safer alternatives in order to promote public safety in licensed venues.

~~3.19~~3.18 A pool of model conditions has been prepared and individuals preparing operating schedules are at liberty to use these conditions~~,~~ or volunteer any other measures(s) to promote the licensing objectives. Please see Appendix C for the pool of model conditions for public safety.

c) Public Nuisance

Measures to limit nuisance

~~3.20~~3.19 The authority will expect applicants to set out in their operating schedules the steps taken, or proposed to be taken, to deal with the potential for public nuisance arising from the operation of the premises.

~~3.21~~3.20 Applicants should identify and describe through a risk assessment how these risks will be managed. Public nuisance could include low-level nuisance perhaps affecting a few people living locally as well as major disturbance affecting the whole community.

~~3.22~~3.21 Applicants will be expected to have included measures in their operating schedules that make adequate provision to:

a) restrict the generation of noise within the premises and from activities associated with the premises in the vicinity, or from an open air site;

b) limit the escape of noise from the premises or open air site;

c) restrict noise emissions to below levels that could affect people in the vicinity going about their business, at work and when at home both while relaxing and while sleeping;

d) minimise and control noise from customers arriving at the premises, or open air site outside it and departing from it;

e) minimise and control noise from staff, contractors and suppliers and their activities;

f) minimise and control noise from vehicles associated with and providing services to the premises or open air site and their customers;

g) determine whether people standing or sitting outside premises are likely to cause obstruction or other nuisance;

h) whether the premises are under or near to residential accommodation;

i) the hours of the sale of alcohol in open containers or food for consumption outside the premises;

j) measures to make sure that customers move away from outside premises when such sales cease;

k) measures to collect drinking vessels and crockery, cutlery and litter;

l) the extent and location of areas proposed to be set aside for the consumption of food and alcoholic drink and for smoking;

m) whether there is a need for door supervisors to prevent or to control customers congregating in outdoor areas to smoke, consume food or drink (whether supplied from the premises or not).

n) adequate measures to prevent the following arising from the proposed licensable activity that may cause disturbance to people in the vicinity:
   a. litter, smells, fumes, dust, smoke, or other emissions;
   b. street fouling;
   c. light pollution.

~~3.23~~3.22 The role of the authority is to maintain an appropriate balance between the legitimate aspirations of the entertainment industry and the needs of residents and other users of the town including businesses, workers, shoppers and visitors.

~~3.24~~3.23 Playing of music can cause nuisance both through noise breakout and by its effect on patrons, who become accustomed to high sound levels and to shouting to make themselves heard, which can lead to them being noisier when leaving premises. Other major sources of noise nuisance are vehicles collecting customers, the slamming of car doors and the sounding of horns. These noises can be particularly intrusive at night when ambient noise levels are lower.

~~3.25~~3.24 Where relevant representations are received, the authority may attach appropriate conditions to licences, necessary to support the prevention of undue noise disturbance from licensed premises. Where premises remain open after 23:00, the licence holder will be expected to provide facilities which are relevant to controlling noise and the patrons of those premises late at night. The authority also expects that premises which produce noise generating licensable activities are acoustically controlled and engineered to a degree where the noise from the premises when compared to the ambient noise level will not cause undue disturbance.

~~3.26~~3.25 The provision of tables and chairs outside the premises, either on the highway or on private land, and the provision of beer gardens, can enhance the attractiveness of the venue. It can have the benefit of encouraging a continental style café culture and family friendly venues. However, late at night, tables and chairs and beer gardens can cause significant public nuisance to residents whose homes overlook these areas.

~~3.27~~3.26 The ‘smoke free public places’ legislation in July 2007 has led to an increase in the number of people outside licensed venues. Where outside facilities are provided the authority expects applicants to provide details in their application of:

a) the location of open air areas; and

b) how the outside areas will be managed to prevent noise, smell, or obstruction and nuisance to neighbours and the public.

~~3.28~~3.27 Licensees and their staff are expected to have sufficient measures in place to prevent such problems arising including a suitable litter and waste

management program to ensure that the area outside the premises is kept free of litter at all times.

~~3.29~~3.28 Where the authority receives relevant representations, or where a responsible authority or an interested party seeks a review, the authority may consider imposing conditions to improve the management of the outside area or prohibiting or restricting the use of these areas in order to promote the public nuisance objective.

~~3.30~~3.29 Conditions may include maximum noise levels over particular time periods, the installation of acoustic lobbies, provision of signs, publicity and dispersal policies.

~~3.31~~3.30 A pool of model conditions has been prepared and individuals preparing operating schedules are at liberty to use these conditions, or volunteer any other measures(s) to promote the licensing objectives. Please see Appendix C for the pool of model conditions for the prevention of public nuisance.

d) Protection of Children from Harm

~~3.32~~3.31 The authority needs to satisfy itself that there are appropriate measures in place to protect children from harm.

~~3.33~~3.32 To this extent it will expect applicants, where necessary, to consider the measures necessary to promote the licensing objective of protecting children from harm when on the premises.

~~3.34~~3.33 These measures may include staff training on how to control the entry of children and young people under 18 and the vetting of staff who will supervise them. Applicants will have to give particular regard to these measures in applications for licences involving:

a) the sale of alcohol;
b) children's performances; and
c) attractions or performances likely to attract children.

~~3.35~~3.34 It is an offence to sell alcohol to children. In this context, children are defined as individuals under 18. The provisions of the Act are that unaccompanied children under 16 should not be on "premises being used exclusively or primarily for the supply of alcohol" (eg "alcohol led" premises such as pubs, bars and nightclubs). In addition, it is an offence to allow unaccompanied children under 16 on premises licensed to sell alcohol for consumption on the premises after midnight but before 05:00.

~~3.36~~3.35 Issues for consideration include:

a) installing effective measures to check the age of those young people who appear under 21 to ensure that alcohol is not sold to those under 18 and those under 16 are accompanied in alcohol led premises;

b) exclusive or primary purpose of the services provided at the premises;

c) accompanied children under 16 on the premises of which the primary purpose is supply of alcohol for consumption on the premises are taking a table meal or are being entertained by a live performance;

d) the hour to which accompanied children under 16 are proposed to be on the premises where the exclusive or primary purpose of the services provided at the premises is the supply of alcohol for consumption on the premises;

e) due regard is paid to industry codes of good practice on the labelling and display of alcoholic drinks;

f) are there adequate procedures for identifying unaccompanied or lost children and ensuring that they are kept safe and adequately supervised until they can be handed over to a responsible adult;

g) the likelihood of children being attracted to the premises by the nature of activities or facilities provided whether or not these are licensed;

h) is there evidence of heavy, binge or underage drinking on the premises;

i) if the premises commonly provides entertainment or services of an adult or sexual nature;

j) is there a strong element of gambling on the premises;

k) age restricted films are to be shown classified in accordance with the recommendations of the British Board of Film Classification;

l) the number of adults required for the supervision of children and the suitability and vetting of those adults to ensure they pose no risk to children.

~~3.37~~3.36 A pool of model conditions has been prepared and individuals preparing operating schedules are at liberty to use these conditions or volunteer any other measures(s) to promote the licensing objectives. Please see Appendix C for the pool of model conditions for the protection of children of harm.

Plans

~~3.38~~3.37 A plan must also be attached to an application for a premises licence or a club premises certificate. The plan should be at a scale of 1:100. The plans do not have to be professionally drawn, however, they must be to scale and contain the relevant information as required under regulation. The authority will accept plans of a scale other than 1:100, however this must be approved prior to submitting the application.

4. Determination of Applications

Decision Making Process

4.1 Decisions on licensing matters will be taken in accordance with an approved scheme of delegation below:

Matters to be dealt with	Full Committee	Sub Committee	Officers
Application for personal licence		If a police objection	If no objection made
Application for personal licence with unspent convictions		All cases	
Application for premises licence/club premises certificate		If a relevant representation made	If no relevant representation made
Application for provisional statement		If a relevant representation made	If no relevant representation made
Application to vary premises licence/ club premises certificate		If a relevant representation made	If no relevant representation made
Application to vary designated premises supervisor		If a police objection	All other cases
Request to be removed as designated premises supervisor			All cases
Application for transfer of premises licence		If a police objection	All other cases
Applications for interim authorities		If a police objection	All other cases
Application to review premises licence/ club premises certificate		All cases	
Decision on whether a complaint is irrelevant, frivolous or vexatious etc			All cases
Decision to object when local authority is a consultee and not the relevant authority considering the application		All cases	
Determination of an objection to a temporary event notice		All cases	
Determination of application to vary premises licence at community premises to		If a police objection	All other cases

include alternative licence condition			
Decision whether to consult other responsible authorities on minor variation application			All cases
Determination of minor variation application			All cases

Unopposed Applications

4.2 If no relevant representations are received the licence will be issued automatically with, in the case of a premises licence or club premises certificate, such conditions attached as are mandatory or are consistent with the operating schedule accompanying the application. The authority will have no discretion to refuse the application or to alter or add to the conditions offered through the operating schedule.

Opposed Applications

4.3 Where relevant representations are made, and not withdrawn, the authority must hold a hearing before a licensing sub-committee who will take such of the following steps as it considers necessary for the promotion of the licensing objectives.

4.4 The steps are:

a) to grant the licence subject to the operating schedule modified to such extent as the sub-committee considers necessary for the promotion of the licensing objectives, and subject to the relevant mandatory conditions;

b) to exclude from the scope of the licence any of the licensable activities to which the application relates;

c) to refuse to specify a person in the licence as the premises supervisor;

d) to reject the application.

Representations

4.5 The authority has discretion on whether to grant applications for licences and to impose conditions on granting and reviewing licences, only when relevant representations are made.

4.6 In brief "relevant representations" is the expression used in the Act for comments including objections on applications.

4.7 For a representation to be relevant it must:

a) relate to the effect of the grant of the licence on the promotion of the licensing objectives;

b) be made by a responsible authority or other persons;

c) not be 'frivolous or vexatious' or, in the case of a review, 'repetitious' if made by other persons; or

d) if it concerns the designated premises supervisor be made by a chief officer of police and include a statement explaining the reasons for the objection.

4.8 Representations can also be made in support of an application.

Appeals

4.9 Anyone aggrieved by a decision of the authority has a right of appeal. This is set out in schedule 5 of the Act.

4.10 The authority will inform the appropriate parties of their right of appeal in accordance with the Act, when confirming a decision of the licensing sub-committee.

4.11 Aggrieved parties should lodge any appeal with the Magistrates' Court within 21 days of the notification of the decision.

5. Temporary Event Notices (TENs)

5.1 The Act enables certain organised events for less than 500 people to take place following notification to the authority, the police and environmental health.

5.2 The limit on the number of TENs which may be given by any applicant is 5 within the same year, unless the applicant holds a personal licence, in which case the limit will be 50 within the same year.

5.3 A number of limitations are imposed on the use of TENs by the Act. The limitations apply to:

- the number of times a premises user may give a TEN is 50 times in a calendar year
- for a personal licence holder and five times in a calendar year for other people;
- the number of times a premises user may give a late TEN is limited to 10 times in a calendar year for a personal licence holder and twice for other people. Late TENs count towards the total number of permitted TENs (i.e. the limit of five TENs a year for non-personal licence holders and 50 TENs for personal licence holders). A notice that is given less than ten working days before the event to which it relates, when the premises user has already given the permitted number of late TENs in that calendar year, will be returned as void and the activities described in it will not be authorised.
- the number of times a TEN may be given for any particular premises is 15 times in a calendar year;
- the maximum duration of an event authorised by a TEN is 168 hours (seven days);
- the maximum total duration of the events authorised by TENs in relation to individual premises is 21 days in a calendar year;
- the maximum number of people attending at any one time is 499; and
- the minimum period between events authorised under separate TENs in relation to the same premises (not including withdrawn TENs) by the same premises user is 24 hours

5.4 Although the statutory legal minimum time required for the notification of a TEN to the authority, police and environmental health is 10 working days, or 5 working days for a late temporary event, it is essential that proper consideration of the proposed event is given. Statutory guidance allows the authority to publicise its preferred timescale for notification.

5.5 Where an existing premises licence is in operation the authority would encourage a TEN to be submitted at least 4 weeks but not more than 12 weeks before an event. For applications where there is not a current premises licence, for example community events, 15 working days in advance of the event would be encouraged to allow for proper consideration of the event.

~~5.6 The authority will encourage bona fide community events. A TEN for existing licensed premises will not be encouraged where the proposal is simply to extend the existing hours of operation.~~

~~5.7 Notice givers are encouraged to consult responsible authorities prior to formal notices being submitted.~~

~~5.8 The authority expects those who have given notice of a temporary event to have identified the particular issues having regard to their type of premises and/or activities, and to have in place written policies for addressing issues such as drunkenness, crime/disorder and drugs on their premises and for ensuring staff are trained on these policies. The contains guidance on promoting the licensing objectives including potential risks and possible solutions for the different types of licensable activities.~~

~~5.9 The processing of TENs by the authority is controlled by a strict statutory timetable, therefore, the authority will not accept a notice unless it is complete in all respects at the time of submission.~~

5.1 A Temporary Event Notice (TEN) must be submitted to the Licensing Authority when a person wishes to provide licensable activities at an event and;

- the premises does not have the benefit of a Premises Licence or Club Premises Certificate, or
- the premises does not have an appropriate Premises Licence or Club Premises Certificate for the event, or
- they do not wish to use any existing Premises Licence or Club Premises Certificate for the event

There are two types of TEN applications.

A 'standard' Temporary Event Notice which must be submitted at least 10 clear working days before the event. The 10 working days does not include the day the Licensing Authority receive the Notice or the first day of the event.

A 'late' Temporary Event Notice which must be submitted 5 clear working days before the event, but no earlier than nine working days before the event and again this does not include the day the Licensing Authority receive the Notice or the first day of the event.

There are certain restrictions relating to a TEN which are set out in the Licensing Act 2003 as follows:

- You must be at least 18 years old to give notice for a TEN.
- You can only give notice for a TEN if you are an individual and not a business or other organisation.
- If you hold a personal licence you may give notice for up to 50 TENs per year, 10 of which may be late TENs.
- If you do not hold a personal licence you may give notice for up to 5 TENs per year, 2 of which may be late TENS.

- The number of times a TEN may be used for any particular premises is 15 times in a calendar year.
- The length of time a single event may last is 168 hours (7 consecutive days in total). If an event spans midnight, this will count as 2 days.
- The aggregated number of days covered by a TEN at any individual premises may not exceed 21 days.
- There must be at least 24 hours between a TEN at the same premises.
- The scale of the event in terms of the maximum number of people attending at any one time must not exceed 499 including staff and performers.

A calendar year for the purpose of the Temporary Event Notice restrictions and limits runs from 1st January until 31st December.

Where an event falls outside the limits as set out above, the premises user must apply for a premises licence.

Where a TEN has not been made electronically, the premises user must provide the TEN to the Licensing Authority, Environmental Health Team and the Police within the prescribed time limits. If the TEN has been submitted electronically, the Licensing Authority will provide a copy to the relevant Environmental Health Officer and the Police.

The Licensing Act 2003 uses the term 'given' but does not define 'given'. We consider the term to mean the date on which we as the Licensing Authority receive the TEN and not the date on which it was sent. If the premises user gives the TEN electronically, the date it is given is the next working day after the TEN is submitted electronically. We advise premises users to hand deliver notices if time is short, as we will not accept TENs received outside of the 5 working day restriction.

5.2 The Police and/or Environmental Health Team may object to a TEN if they believe that the event will undermine the four licensing objectives.

The Police or Environmental Health can agree with the premises users, to modify a standard TEN to enable the licensable activities to go ahead. This will only be permissible were all parties agree to the modifications.

Where the premises user has given a standard TEN and the parties cannot reach an agreement to modify the TEN, the Licensing Committee will determine as follows:

- Allow the event to proceed as stated within the notice
- Impose conditions that already apply to an existing premises licence at the premises
- Issue a counter notice to prevent the event going ahead.

5.3 If an objection has been received in regards to a late TEN (given less than five days before the event) this will be void and will not be able to be used. A Counter Notice will be issued by the Licensing Authority to cancel the TEN.

Where organisers are planning larger events, the expectation is that a premises licence will be applied for. However, there are occasions where

organisers seek to divide an area of land (the premises) to create separate artificial premises for the purpose of licensing.

Where a premises user proposes to give more than one TEN for the same event, we will assess each TEN on its merits to determine whether using the TEN will undermine any of the licensing objectives. However, we will have regard to the fact that more than one TEN will be in use and we will consider the event to be a 'large event' and as such we expect the premises user to show that they have considered all elements, and additional information may be requested.

6. Personal Licences – New Applications

6.1 A personal licence is a licence issued to an individual authorising them to make or authorise the sale of alcohol in accordance with a Premises Licence. Every Premises Licence that authorises the sale of alcohol must specify an individual who acts as the Designated Premises Supervisor (DPS). The DPS must hold a Personal Licence.

6.2 Applications for Personal Licences should be made to the Licensing Authority for the area where the applicant is ordinarily resident at the time they make their application.

6.3 The Licensing Authority must reject an application if the applicant fails to meet one or more of the requirements set out in (a) to (d) below:

a. Applicants must be aged 18 or over

b. Applicants must be entitled to work in the United Kingdom

c. Applicants must possess a licensing qualification or is a person of a prescribed description

d. Applicants must not have forfeited a personal licence in the five-year period prior to their application being made

e. Applicants must not have been convicted or any relevant offence or any foreign offence or required to pay an immigration penalty

6.4 Where the applicant meets the requirements in (a) to (d) but does not meet the requirements of (e), the Licensing Authority must give the chief officer of police for its area a notice to this effect. Having received such a notice, if the chief officer of police is satisfied that the granting of the application would undermine the crime prevention objective, they must within 14 days, give the Licensing Authority a notice to that effect.

6.5 Where the applicant fails to meet the requirements of (e) as a result of a conviction for an immigration offence or because they have been required to pay an immigration penalty, the licensing authority must give a notice to the Secretary of State for the Home Department to that effect. The Home Office may object to an application on grounds that granting the personal licence would be prejudicial to the prevention of illegal working in licensed premises.

6.6 Where an objection to the grant of a personal licence is received from either the chief officer of police or the Home Office, the applicant is entitled to a hearing before the licensing authority. If no objections are received, the Licensing Authority must grant the application.

6.7 At a hearing to determine a personal licence application to which the chief officer of police or Home Office have objected, the licensing authority will have regard to all of the circumstances including the following:

• The need to assess each case on its merits

• The duty to promote the crime prevention objective

• The objection notice given by the Police or Home Office

• The guidance issued by the Secretary of State under section 182 of the Licensing Act 2003

• The seriousness of the relevant offence

• The sentence or penalty imposed on the applicant for the relevant offence

• Any representations made by the applicant

• Any other evidence as to the previous character of the applicant.

6.8 If, having considered all of the circumstances, the Licensing Authority considers that it is appropriate for either the promotion of the crime prevention

objective or for the prevention of illegal working in licensed premises to reject the application, it must do so. In all other cases the application must be granted.

6.9 If an application is refused, the applicant will be entitled to appeal against the decision they make. Similarly, if the application is granted despite a police objection notice or an objection from the Home Office, the chief officer of police or Home Office are entitled to appeal against the licensing authority's determination. The licensing authority will therefore record in full the reasons for any decision that it makes.

7. Personal Licences – Suspension and Revocation

7.1 Section 138 of the Policing and Crime Act 2017 amended the Licensing Act 2003 and gave the power to a Licensing Authority to suspend or revoke personal licences that it has issued with effect from 6th April 2017.

7.2 When a Licensing Authority has granted a personal licence and becomes aware that the licence holder has been convicted of a relevant offence or foreign offence or been required to pay an immigration penalty, a licensing authority may revoke the licence or suspend it for a period of up to six months. This applies to convictions received and civil immigration penalties which a person has been required to pay at any time before or after the licence was granted, as long as the conviction was received after 6 April 2017, or the requirement to pay the civil penalty arose after 6 April 2017. Prior to 6 April 2017 only magistrates' courts can order the forfeiture or suspension of a personal licence for convictions.

7.3 The process which must be undertaken by the Licensing Authority to suspend or revoke a personal licence is set out at section 132A of the 2003 Act. The decision to revoke or suspend a personal licence must be made by the licensing committee or sub-committee.

7.4 The Licensing Authority may not take action if the licence holder has appealed against the conviction or the sentence imposed in relation to the offence, until the appeal is disposed of. Where an appeal is not lodged, the Licensing Authority may not take action until the time limit for making an appeal has expired.

7.5 If a Licensing Authority is considering revoking or suspending a personal licence, the authority must give notice to the licence holder. This notice must invite the holder to make representations about the conviction, any decision of a court in relation to the licence, or any decision by an appellate court if the licence holder has appealed such a decision. The licence holder may also decide to include any other information, for example, about their personal circumstances.

7.6 The licence holder must be given 28 days to make their representation, beginning on the day the notice was issued. Before deciding whether to revoke or suspend the licence the Licensing Authority must consider any representations made by the licence holder, any decisions made by the court or appellate court in respect of the personal licence of which the Licensing Authority is aware, and any other information which the Licensing Authority considers relevant.

7.7 The Licensing Authority may not be aware of whether the court considered whether to revoke or suspend the licence, and there is no obligation on the Licensing Authority to find this out before making a decision themselves. Where the court has considered the personal licence and decided not to take action, this does not prevent the Licensing Authority from deciding to take action itself. Licensing Authorities have different aims to courts in that they must fulfil their statutory duty to promote the licensing objectives, and therefore it is appropriate for the Licensing Authority to come to its own decision regarding the licence.

7.8 If the Licensing Authority, having considered a suspension and revocation and subsequently considered all the information made available to it, proposes not to revoke the licence it must give notice to the chief officer of police in the Licensing Authority's area, and invite the chief officer to make representations about whether the licence should be suspended or revoked, having regard to the prevention of crime. The chief officer may make representations within the period of 14 days from the day they receive the notice from the Licensing Authority.
7.9 Any representations made by the chief officer of police must be taken into account by the Licensing Authority in deciding whether to suspend or revoke the licence.
7.10 Convictions may come to light via police in another area, for example if the personal licence holder no longer lives in the area of the Licensing Authority which issued the licence, or if the offence took place in another police force area. In this instance it would be good practice for the police providing the information to notify the police force in the Licensing Authority area, because it is the local chief officer who must provide representations if the Licensing Authority proposes not to revoke the licence.
7.11 Where the licence holder is convicted of immigration offences or has been required to pay a civil penalty for immigration matters, the Licensing Authority should notify Home Office Immigration Enforcement and allow representations to be made in the same way.
7.12 In deciding whether to suspend or revoke a personal licence, the Licensing Authority will have regard to all of the circumstances including the following:
• The need to assess each case on its merits
• The duty to promote the licensing objectives
• The guidance issued by the Secretary of State under section 182 of the Licensing Act 2003
• The seriousness of the relevant offence
• The sentence or penalty imposed on the licence holder for the relevant offence
• Any representations made by the Police or Home Office Immigration Enforcement
• Any representations made by the holder of the licence
• Any evidence as to the previous character of the holder of the licence.
7.13 The Licensing Authority must notify the licence holder and the chief officer of police of the decision made (even if the police did not make representations). The licence holder may appeal the Licensing Authority's decision to revoke or suspend their personal licence. A decision to revoke or suspend the licence does not take effect until the end of the period allowed for appealing the decision (21 days); or if the decision is appealed against, until the appeal is disposed of.
7.14 If the personal licence holder is a DPS, the Licensing Authority may notify the premises licence holder once the decision to revoke or suspend the licence has been made if it becomes necessary to do so in order for the Licensing Authority to be able to carry out their functions.
7.15 The Licensing Authority may also notify any person who has declared an interest in the premises under section 178 of the 2003 Act if it becomes necessary to do so in order for the Licensing Authority to be able to carry out their functions.

8.~~6.~~ Integrating Strategies & Specific Policies

8.1 The authority has established a good track record of partnership work and will continue to work in partnership with the police, local residents, businesses, licensees, communities and regulatory agencies towards safeguarding the quality of life for residents, and the creation of a safer and more pleasant environment for all.

8.2 In particular, Cheltenham has a vibrant night-time economy that far exceeds other towns of similar sizes. The town offers a rich choice of entertainment and facilities making it a destination attracting usually high numbers of visitors, some travelling considerable distances to enjoy what the late night economy has to offer.

8.3 Although the vast majority of people visiting the town do so safely and responsibly, an active night-time economy nonetheless demands additional resource and cost for the authority, police and other partners to deal with associated crime, disorder and other anti-social behaviour.

8.4 Although the challenges associated with the supply of alcohol are more prevalent during the night-time economy, there are nonetheless also challenges during other times of the days.

8.5 In addressing these challenges, the authority will continue to work with partners in particular the licensed trade, licensing enforcement, the police, the ~~noise pollution~~environmental protection team, community safety partnerships, Gloucestershire fire service and planning enforcement.

Encouraging diversity in the night-time economy that is less focused on alcohol

8.6 Cheltenham has a vibrant night-time economy that far exceeds other towns of similar sizes. It is recognised that the night-time economy plays an important part in creating a vibrant and sustainable economy but this must be balanced with the ambition to expand the offer for leisure, tourism and business by providing an attractive offer for all ages and religious groups.

8.7 To this end, the authority will explore and support opportunities to increase events, activities and businesses which are not necessarily alcohol led which are more socially-inclusive and drive the economy.

Designated area of concern

8.8 There are areas of the borough where the evidence does not suggest that they should be designated as Cumulative Impact Areas but which will require regular review to establish whether the concentration of licensed premises are considered to have begun to cause cumulative impact on one or more of the licensing objectives.

8.9 The authority has identified the town centre (Appendix D) as being an area of concern in that it is susceptible to alcohol related crime, alcohol hospital admissions and nuisance arising from or caused by the customers of licensed premises.

8.10 The authority will monitor the number of licensed premises in the designated area and any risk factors that may indicate that the area is reaching a point when a cumulative impact is likely or imminent.

8.11 The designated area of concern will also provide the authority and its partners an opportunity to put measures in place to address the concerns highlighted.

Joint Core Strategy and other planning policies

8.12 There are a number of key planning policies that sets out a shared vision and proposes where future developments in the borough are located.

8.13 It is noted that the statutory guidance states: “The statement of licensing policy should indicate that planning permission, building control approval and licensing regimes will be properly separated to avoid duplication and inefficiency. The planning and licensing regimes involve consideration of different (albeit related) matters. Licensing committees are not bound by decisions made by a planning committee, and vice versa. However, as set out in chapter 9, licensing committees and officers should consider discussions with their planning counterparts prior to determination with the aim of agreeing mutually acceptable operating hours and scheme designs.”

Public Spaces Protection Order (PSPO)

8.14 The authority has adopted a Public Spaces Protection Order to control and regulate the public consumption of alcohol in Cheltenham.

8.15 The PSPO creates an offence for any person to disregard the instruction of a Police Officer, Police Community Support Officer or authorised officer of the authority to stop consuming alcohol in a designated public place.

8.16 An offence under the adopted PSPO can be discharged through the payment of a fixed penalty notice or a prosecution.

Management of Licensed Premises

8.17 A critical element of the proper control of licensable activity and a premises where such activity is provided is good management of those activities and the premises generally.

8.18 The authority will encourage everybody involved in providing or are involved in licensable activities, to consider what skills and competencies are appropriate in the safe delivery of regulated activities and secure these. This applies to managers, musicians, door staff, bar staff, performers and

contractors as well as everyone associated with the activities.

8.19 Good management also extends to the appropriate advertising of events and premises users and licensees are expected to control advertising content as part of their role.

8.20 The authority undertakes proactive risk based inspections of all licensed premises to ensure that they are managed properly. Premises that consistently fail inspections may be subject to a licence review or other enforcement action.

Designated Premises Supervisor (DPS)

8.21 Any premises where alcohol is sold under a premises licence must have a designated premises supervisor (DPS). The DPS will be named in the premises licence, a summary of which must be displayed on the premises. A DPS must be a personal licence holder. Every sale of alcohol must be made or authorised by a person who holds a personal licence (or must be made or authorised by the management committee in the case of a community premises)

8.22 The Act does not require a DPS or any other personal licence holder to be present on the premises at all times when alcohol is sold. However, the DPS and the premises licence holder remain responsible for the premises at all times. During times the DPS is not present on site, the authority recommends that written delegation of duties are drawn up to ensure staff and regulators are clear about who is authorised to sell alcohol.

8.23 The authority will normally expect the DPS to have been given the day-to-day responsibility for running the premises and as such it is expected that the DPS would usually be present at the licensed premises on a regular basis. The authority expects that this will be in excess of 50% of a 7-day week.

~~8.23~~8.24 There can only be one appointed DPS specified on the premises licence. However, there can be more than one personal licence holder within the business and this is recommended to demonstrate a good understanding of how to work within the licensed trade.

~~8.24~~8.25 The premises licence holder will be expected to ensure that the DPS has experience commensurate with the size, capacity, nature and style of the premises and licensable activities to be provided.

~~8.25~~8.26 Within all licensed premises, whether or not alcohol is to be sold, the authority will expect there to be proper management arrangements in place which will ensure that there is an appropriate number of responsible, trained/instructed persons at the premises to ensure the proper management of the premises and of the activities taking place, as well as adherence to all statutory duties and the terms and conditions of the premises' licence.

Nightsafe

~~8.26~~8.27 The borough-wide Nightsafe network encourage its members to work together to promote the licensing objectives in their premises by providing a forum for sharing information, disseminating best practice and meeting with representatives of the authority, the police and other responsible authorities. The authority actively supports the scheme and is keen to support the development of more schemes where there is a demand.

8.28 The inclusion of radio links and ring-round phone systems should be considered an appropriate condition for public houses, bars and nightclubs operating in the town. These systems allow managers of licensed premises to communicate instantly with the police and facilitate a rapid response to any disorder which may be endangering the customers and staff on the premises.

~~8.27~~8.29 The Nightsafe scheme in Cheltenham is delivered as part of Gloucestershire Safe scheme www.gloucestershiresafe.co.uk/

Best Bar None

~~8.28~~8.30 Best Bar None (BBN) is a national award scheme supported by the Home Office and aimed at promoting responsible management and operation of alcohol licensed premises. It was piloted in Manchester in 2003 and found to improve standards in the night-time economy, with premises now competing to participate.

~~8.29~~8.31 The aim of BBN is to reduce alcohol related crime and disorder in a town centre by building a positive relationship between the licensed trade, police and local authorities. The authority will actively encourage licensed premises to sign up to the BBN scheme.

~~**Reducing Alcohol Related Harm (RARV)**~~

~~8.30 In 2006 when the Reducing Alcohol Related Violence project, supported by funding from Government Office South West, was launched in Cheltenham a great deal of effort has gone into reducing alcohol related harm and disorder in the town.~~

~~8.31 The Codes of Practice launched in 2007 laying down common sense principles for all sectors of the night-time economy were the first such set of codes produced in the UK and were acknowledged as best practice by the Home Office.~~

~~The RARV Codes of Practice was revised in 2014 and republished in 2015.~~

Woman's Safety and Wider Vulnerability

8.32 It is a fundamental right that women should live without fear. We are committed to tackling male violence, intimidation and abuse against women and girls and we strive to foster an environment amongst our Licensed Premises that ensure all women feel safe whether they are workers, local residents or visitors to the borough.

8.33 The safety of women within the evening and night-time economy is crucial, as often the nighttime can pose a risk of harassment, unwelcome situations and a feeling of vulnerability. Cheltenham's town centre pledge aims to create a safer town so that women and girls always feel welcome, confident and ultimately safe.

8.34 By signing the pledge, you are recognising women have the right to enjoy our licensed premises and that they should feel safe and respected when doing so. This shows that you, as an operator, are committed to improving women's safety across our borough.

8.35 As a licensed premises, establishing clear policies and staff training can create a more secure atmosphere and implementing simple measures such as well-lit entrances and exits and having visible security can enhance overall safety and comfort for women in social spaces.

Staff training

8.36 By providing staff training which focuses on increasing the skills, knowledge and confidence to identify vulnerability and what the appropriate interventions should be.

8.37 We encourage regular refresher training sessions to stay updated on best practices, emerging issues and campaigns relating to the promotion of women and vulnerable people's safety and wellbeing.

Women's safety policy

8.38 We advise developing a bespoke women's safety policy for your premises. This can be a useful tool to establish clear guidelines and expectations on how you and your staff will manage any situations that may occur.

8.39 It should provide a framework for reporting incidents and ensuring appropriate actions are taken. Where you have implemented a policy, all staff should be made aware and trained on the same to promote accountability.

8.40 Policies should be regularly reviewed to guarantee they remain relevant and effective. Changes should be made based on feedback, incident reports, and emerging safety trends.

Safe Space

8.41 A safe space within your premises can be used by customers if they feel uncomfortable or threatened. The area should be secure and monitored by appropriate security personnel. All staff should be aware of where these areas are located within the premises.

8.42 Safe Spaces or Safe Havens are key for where you have adopted such schemes as 'Ask for Angela' where a woman or vulnerable person can make a discreet signal by asking for Angela, to alert staff if they are in danger or need help removing themselves from a situation.

'Ask for Angela' scheme

8.43 Cheltenham Borough Council actively supports the scheme and promotes the scheme as good practice for all licensed venues.

8.44 Information and resources on the 'Ask for Angela' scheme www.askforangela.co.uk/

Drink spiking

8.45 As a licensed premises, suitable measures should be taken to prevent incidents of spiking. In November 2024 the Government announced that spiking will become a new criminal offence, and thousands of staff working in the night-time economy will also receive training on how to spot and tackle spiking.

The following are examples within the range of behaviours that would be considered spiking:

• Putting alcohol into someone's drink without their knowledge or permission
• Putting drugs into an alcoholic or non-alcoholic drink without their knowledge or permission
Premises must ensure all reports of spiking are acted upon and that all incidents of alleged spiking are recorded and reported to the police. It is helpful to the police if staff: obtain full details of the affected person reporting the incident, including a description of what they are wearing; a description of the suspected perpetrator, if known, including clothing; an approximate time of the incident and the location within the premises where they believe it occurred; can secure the drinking vessel(s) that is suspected as containing the 'spiked drink' so this can be tested at a later time; and can seize any drinking vessel that the suspect may have been using.
Ensure the health and safety of the customer, which could be by calling emergency services, ensuring they are with trusted friends who will look after them, offering assistance if needed, and providing a safe space for the customer.
Ensure appropriate training is provided to relevant members of staff. Literature is available from Gloucestershire Police.
Review searching procedures and amend as necessary, as well as reviewing how often toilets are inspected, as victims of spiking have been found in there. Premises should also review the functionality of any CCTV and ensure it is not obscured.
Consider providing information (such as posters) regarding drink spiking in the premises.
Consider if it would be useful to provide anti-spiking bottle stoppers and protective drink covers. It may also be helpful to see if drug testing kits are available.
Where bottles of alcohol are purchased from the bar and left unsupervised at tables, suitable steps should be taken to ensure this doesn't pose an additional risk as a result of free pouring or putting alcohol into someone's drink without their knowledge or permission. This could lead to an increased vulnerability particularly to women.

Sexual Entertainment

~~8.32~~8.46 The authority has adopted the amended provisions of schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 as amended by section 27 of the Policing and Crime Act 2009 ('the 2009 Act') with respect to "relevant entertainment", that is:

a) any live performance; or
b) any live display of nudity.

which is of such a nature that, ignoring financial gain, it must reasonably be assumed to be provided solely or principally for the purpose of sexually stimulating any member of the audience (whether by verbal or other means).

~~8.33~~8.47 The adopted provisions came into effect on the 1st of December 2010 in Cheltenham.

~~8.34~~8.48 Any premises that want to offer relevant entertainment on a regular basis, that is more frequent than 24 hours once a month on no more 11 occasions a year, can no longer offer this under the provisions of the Act as a result of the abovementioned adoption. These premises must apply for a Sexual Entertainment Venue (SEV) licence.

~~8.35~~8.49 Premises that want to offer relevant entertainment on an irregular basis can still do so under the provisions of the Act. These premises must be authorised for the performance of dance and the performance of recorded music.

~~8.36~~8.50 The Government has seen it fit to exempt infrequent sexual entertainment from requiring a licence. Whilst the authority recognises and accepts this, it is also acutely aware that unless it is properly managed there are risks to public protection and safety, an increased likelihood of associated crime & disorder and an inability of regulatory bodies to respond accordingly.

~~8.37~~8.51 Whilst the authority cannot legitimately impose restrictions on infrequent sexual entertainment, it has formulated an exempt sexual entertainment code of practice outlined in its adopted SEV policy. The intention of the code of practice is to promote responsible and properly managed exempt sexual entertainment. The authority expects any premises wishing to offer infrequent sexual entertainment to adhere to the code of practice.

Core Hours for Licensable Activities

~~8.38~~8.52 The authority will avoid arbitrary restrictions on licensing hours that undermine the principles of flexibility and consideration of each application is on its own merit.

~~8.39~~8.53 The authority believes that licensable activities carried on within the core hours set out below will generally not have a harmful impact on the licensing objectives, address the concerns raised by local residents and businesses and are less likely to attract representations.

~~8.40~~8.54 Furthermore, earlier closing will result in less alcohol consumption and drunkenness and would also be consistent with the ability to get crowds dispersed from the town centre.

Table 1: Core Hours for Licensable Activities

Type of premises	**Commencement hour no earlier than**	**Terminal hour no later than**
Off licence	09:00	23:00
Restaurants	10:00	01:00
Theatres, cinemas and other performance venues	10:00	00:00

Pubs/Bars/Nightclubs	Town centre[1] 10:00	03:00
	Local Neighbourhood Areas 10:00	00:00
Takeaways	23:00 ~~n/a~~	04:00

~~8.41~~8.55 Where relevant representations have been made, it will take the following matters into consideration when making a decision. These are not a definitive list and other matters may be considered:

a) Operating schedules - demonstration of compliance with management standards to support each of the licensing objectives.

b) Proximity to residential accommodation - the likelihood of the operation to have an adverse impact on the peace and quiet of local residents.

c) Potential noise and nuisance from people leaving and entering the premises.

d) Ability to demonstrate that systems are in place to ensure timely dispersal of customers away from residential areas.

e) Use of external areas for carrying out the licensable activities and potential noise impact on local residents.

f) Proposed hours of the licensing activities and general opening times for the public – The use of winding down periods to enable more efficient dispersal.

g) Type of use – alcohol led premises such as pubs, bars and nightclubs, off licenses and hot food take away premises are more likely to be associated with crime and disorder and public nuisance than other premises such as seated restaurants, theatres, cinemas and other cultural activities.

h) Availability of public transport to assist in the timely dispersal of customers from the vicinity and to ensure safe travel home.

i) The potential for contamination of the street environment through increased litter and other pollution of the streets by customers.

~~8.42~~8.56 The hours of existing licensed premises will remain unchanged unless there are good reasons, based on the licensing objectives, for restricting these hours, and then they can be changed by a licensing sub-committee following a review of the premises licence.

[1] As defined in Appendix D.

Latest admission times

~~8.43~~8.57 The authority considers it undesirable that persons should seek to 'top up' their alcohol intake by seeking out those premises that are admitting customers at the latest times because persons moving between venues late at night can lead to crime, disorder and public nuisance.

~~8.44~~8.58 Establishing last entry times can reduce the tendency of customers to concentrate at those premises which remain open the latest, without restricting the hours of trading. This will encourage dispersal and reduce the pressure on late-night refreshment outlets and transport facilities which will assist with objectives to prevent public nuisance and crime and disorder in certain circumstances.

~~8.45~~8.59 It is therefore this council's policy that the latest admission time, for licences premises open past midnight, to be no less than:

a) one hour for nightclubs & late night bars; and
b) half an hour for pubs and other licensed premises

before the terminal hour for licensable activities.

Takeaway food premises

~~8.46~~8.60 It is recognised that takeaway premises open late at night can be associated with disorder as persons under the influence of alcohol having left, or in some cases being ejected from, late night venues congregate there.

~~8.47~~8.61 As such the authority considers that it will normally be inappropriate to grant a premises licence permitting the sale of alcohol at premises which are principally used for selling hot food for consumption off the premises.

~~8.48~~8.62 Applicants for licences are recommended to have written policies for dealing with disorder and nuisance and should give consideration to the issues regarding takeaways.

~~8.49~~8.63 The authority will normally require licensed premises principally used for selling hot food for consumption off the premises to have suitable CCTV installed and may impose a requirement to employ SIA doormen where such a requirement is deemed necessary.

~~8.50~~8.64 Operators (including mobile units) must have suitable arrangements in place for the containment and disposal of their waste in accordance with the Environmental Protection Act 1990 and subsidiary regulations. Operators of premises where food or drink is provided in disposable containers for consumption elsewhere than on the premises are expected to consider the potential for litter near their premises and take steps to actively reduce the amount of litter generated from their premises.

~~8.51~~8.65 Where the authority considers it appropriate, it may impose conditions on a premises licence to require the operators of premises serving customers

with hot food or drink to provide litter bins in the vicinity of the premises in order to prevent the accumulation of litter from its customers.

Pavement Cafes and External Areas

~~8.52~~8.66 The authority wishes, as far as is compatible with other highway uses, to promote the 'cafe culture' in Cheltenham because of the added life and vitality this brings to the town.

~~8.53~~8.67 Whilst the provision of tables and chairs outside a premises can enhance the attractiveness of a venue, regard should be had to the need to ensure that the use of such areas will not cause nuisance to local residents and other premises in the vicinity. To this end, the authority will normally restrict the use of external areas to 23:00.

~~8.54~~8.68 Premises that make use of external areas are expected to manage those areas in such a way that its use does not impede access to the premises, obstruct the highway and does not cause disturbance.

8.69 In particular the authority will expect premises to provide ash trays or wall mounted cigarette bins for patrons, be aware of the possibility of breakages of drinking glasses and glass bottles in outside areas.

~~8.55~~8.70 Businesses are reminded that outside areas may require a Pavement Licence and these should be applied for separately. Further advice can be obtained from the website.

On and off sales

8.71 There are two different types of permissions for alcohol sales. On and off sales.

8.72 On sales describes a premises where alcohol is consumed at the point of sale, such as a pub, bar, nightclub or café.

8.73 Off sales describes a premises that is licensed to sell alcoholic beverages for consumption off the premises, as opposed to a bar or public house, which is licensed for consumption at the point of sale (on sales).

8.74 Off-licences typically are specialist shops, convenience stores, parts of supermarkets and attached to bars and pubs. Prices are usually substantially lower than in bars or pubs.

8.75 Premises can apply for both on and off sales if they wish to carry out both types of alcohol sales. This could cover, for example, a pub or a restaurant where customers can consume alcohol on the premises and also be able to purchase alcohol to take away from the premises.

Promoting safe drinking limits

Irresponsible Drinks Promotions and Drunkenness on Premises

~~8.56~~8.76 Low cost alcohol sold in on and off trade premises increases alcohol consumption which can lead to crime and disorder issues. Through this policy the authority would like to encourage the responsible consumption of alcohol and where there is evidence that the licensing objectives are being compromised or are likely to be compromised, the authority will consider imposing controls on drinks promotions to deal with localised problems.

~~8.57~~8.77 However, the authority would prefer an approach whereby it, along with the licensed trade and other partners, are able to promote responsible retailing of alcohol instead of having to deal with the effects of irresponsible drinks promotions and drunkenness.

Code of Good Practice for Drinks Promotions

~~8.58~~8.78 It is a known fact that the price of alcohol does have an effect on the amount people consume. It is also the case that people are more attracted to premises that offer low cost alcohol and low cost alcohol is likely to cause people to consume more alcohol than they would normally have done. Both of these situations can lead to crime, disorder and public nuisance issues.

~~8.59~~8.79 The authority does not wish to unnecessarily impose operational restrictions and freedoms on licensed premises. It would therefore like to encourage a voluntary code of good practice in relation to drinks promotions and to encourage licence holders and others working at the premises to familiarise themselves with the mandatory conditions relating to drinks promotions.

~~8.60~~8.80 To this end, the authority will encourage all licence holders to apply the following principles in relation to any drinks promotions:

Principle
Align pricing with Alcohol by Volume (ABV).
Start the sale of alcohol later in the day and not align it purely with opening hours.
Refrain from all-inclusive offers.
Promotional information should clearly display: - Factual information on the alcoholic strength of a drink(s); - That no-one under the age of 18 years may take part in the promotion; - display Drink Aware logo/information.

Promotions should not: - focus on the strength of any alcohol product as the principle theme; - condone or encourage illegal, excessive or irresponsible drinking (such as binge-drinking, drunkenness or drink-driving); - refer in any favourable manner to the effects of intoxication or consumption; - suggest that alcohol consumption enhances sexual attractiveness or include promotion material that is linked to sexual imagery implying sexual success or prowess.
Restrict multi buy promotions.
No advertisements for alcohol in the shop window.
Alcohol should not be given away for free as part of a promotion or as an incentive.
Actively promote designated driver schemes where a driver is offered discounted or free non-alcoholic drinks.
Make food and hot drinks available in late venues.

Shops Selling Alcohol (Off Licences)

~~8.61~~8.81 There has been a trend towards more alcohol being purchased from shops and consumed at home and less being purchased and consumed in traditional pubs, restaurants and night clubs than used to be the case in the past. The growing practice of “pre-loading” has the potential to create specific problems and detriment to the licensing objectives *including the increased potential for underage and proxy sales which is detrimental to the protection of children from harm.*

~~8.62~~8.82 Furthermore, the availability of alcohol for consumption off the premises has the potential to cause other problems that include ease of access to alcohol by children, ease of thefts, encouragement of street drinking, and increase of crime and disorder and public nuisance.

~~8.63~~8.83 There are a number of ways in which licence holders and the authority can address these concerns.

Hours of Operation

~~8.64~~8.84 See Table 1: Core Hours for Licensable Activities on page 27.

Layout and Operation of Premises

~~8.65~~8.85 In most cases a licence holder will be able to address the potential problems and detriment to the licensing objectives, through the layout and the operation of the premises.

~~8.66~~8.86 The authority will encourage all licence holders licensed for off sales to:

a) Store high strength alcohol behind the shop counter;
b) Not store or display any alcohol at the entrance/exit points of the premises;
c) Not advertise alcohol in a shop window;
d) Not sell single cans of beer or bottles of beer under 1 litre;
e) Not sell beer or cider over 5.5% ABV;
f) Not store or display any alcohol at or near check-outs; and
g) Refuse to sell alcohol to persons known to be persistent offenders (where the offence(s) relates/associated with alcohol) or street drinkers.

Licence Conditions & Reviews

~~8.67~~8.87 Where there is evidence that the licensing objectives are being compromised or are likely to be compromised, the authority will consider imposing appropriate restrictions on a licence. This may include, although not limited to, restricting the hours for licensable activities, restricting the sale of alcoholic beverages over a specified limit of alcohol by volume and/or of specified quantities.

Late night refreshment exemptions based on designated locations, premises types and times

~~8.68~~8.88 Paragraph 2A of Schedule 2 to the 2003 Act (as inserted by the Deregulation Act 2015) gives licensing authorities powers to exempt premises, in certain circumstances, from the requirement to have a licence to provide late night refreshment.

~~8.69~~8.89 This authority has not resolved to exempt and premises from the requirement to have a licence to provide late night refreshment.

9. Film Classifications

9.1 The authority has a statutory obligation to classify films for public screening. The British Board of Film Classification (BBFC) is the nominated body that classifies films to be exhibited in cinemas on behalf of Licensing Authorities. Films that have not been classified by the BBFC and are to be screened in the borough must be submitted to the authority for classification.

9.2 All requests to classify a film must be accompanied by a synopsis of the film and a full copy of the film in DVD or other appropriate format. Requests shall be assessed by officers of the authority against the BBFC guidelines and the

licensing objectives. Officers shall view the entire film and make a recommendation with regards to the appropriate classification. Officers do however reserve the right to refer the classification of a film to a licensing sub-committee in instances deemed necessary.

9.3 All requests must be submitted at least 28 days before the proposed screening. Failure to submit a request in time may result in the authority being unable to classify the film.

10. Events on Council Land

10.1 The authority wants to encourage cultural and community events in the borough but at the same time also protect the quality of life for residents.

10.2 In accordance with the provisions of the Act, the authority has made applications and been granted premises licences for areas of public land.

10.3 Persons wishing to carry on licensable activities on licensed public land will not be required to obtain a premises licence or give a temporary event notice themselves but must seek permission from the authority to use the premises licence to put on their event unless the nature of the event is such that it does not fall within the terms of the licence.

10.4 The authority has an adopted process for considering requests for events to be held on public land. In the first instance, persons wishing to use council land for an event must complete and submit an application form.

10.5 In addition, a Safety Advisory Group (SAG) may be established in order to consider any safety issues related to an event. The event organiser must produce an event plan and must incorporate an operating schedule, risk assessments and address any safety issues before the authority allows the use of its licence.

11. Enforcement

11.1 In terms of regulation, our aim is to target those premises which are causing problems within our communities whilst supporting well managed premises and community activities, which provide worthwhile opportunities for the enjoyment of leisure time without having a negative impact. Premises associated with disorder, threaten public safety, generate public nuisance, or threaten the well-being of children will be targeted for enforcement action.

11.2 Once licensed, it is essential that premises are maintained and operated so as to ensure the continued promotion of the licensing objectives and compliance with the specific requirements of the Act.

11.3 The authority will monitor compliance with the licensing objectives through a programme of inspection visits. The proactive inspection visits are risk based so that those premises that are at a higher risk of adversely affecting the licensing objectives are more frequently inspected.

11.4 The authority will also establish enforcement protocols with the police and other enforcement agencies to ensure efficient and targeted joint enforcement is undertaken on a regular basis.

11.5 This does not prevent action being taken by any individual authority at any time should offences become apparent.

11.6 The authority will take in to account its adopted corporate enforcement policy when deciding what appropriate action to take.

Reviews

11.7 At any stage, following the grant of a premises licence, a responsible authority, or other person, may ask the authority to review the licence because of a matter arising at the premises in connection with any of the four licensing objectives.

11.8 In every case, the application for review must relate to particular premises for which a licence is in existence and must be relevant to the promotion of the licensing objectives.

11.9 The necessary forms and documents are available from the authority's website at http://www.cheltenham.gov.uk/licensing or from the licensing section during normal office hours.

Suspension of Licences and Certificates for Non-Payment of Annual Fees

11.10 As a result of powers introduced under the Police Reform and Social Responsibility Act 2011, the Licensing Authority must suspend Premises Licences and Club Premises Certificates if the holder of the relevant authorisation fails to pay their annual fee.

11.11 However, this does not apply immediately if the payment was not made before or at the time of the due date because of an administrative error, or

because the holder disputed liability for the fee. In either of these cases, there is a grace period of 21 days. This period will be used by the Licensing Authority to contact the licence or certificate holder in attempt to resolve the dispute or error. If the dispute or error is not resolved during this 21-day period, the licence or certificate will be suspended.

11.12 When suspending a licence or certificate a notice of suspension will be given in writing to the licence or certificate holder. The police and any other relevant responsible authorities will also be notified of the suspension at the same time.

11.13 A premises licence or certificate that has been suspended does not have effect. However, it can for example be subject to a hearing or, in the case of a premises licence, an application for transfer. The licence will nevertheless only be reinstated when the outstanding fee has been paid. Formally, the debt is owed by the holder who held the licence at the time it was suspended. However, it may be more likely in practice that the new holder will actually make the payment.

11.14 Once payment has been received a written acknowledgement will be given to the licence or certificate holder and the suspension will be lifted. The police and any other relevant responsible authorities will be notified that the suspension has been lifted at the same time.

11.15 Premises licence holders will receive the following invoices:

- Initial invoice 2 weeks before annual fee due date
- First reminder on annual fee due date
- Final reminder 2 weeks after annual fee due date
- Premises licence~~/~~ or club premises certificate will be suspended 21 days after annual fee due date if payment is not received

Appendix A –Consultees

This document has been developed by the authority in consultation with representatives of the following key stakeholder groups and organisations:

- the chief officer of police for the area;
- the fire and rescue authority for the area;
- each local authority's Director of Public Health in England (DPH);
- persons/bodies representative of local premises licence holders;
- persons/bodies representative of local club premises certificate holders;
- persons/bodies representative of local personal licence holders; and
- persons/bodies representative of businesses and residents in its area.

Appendix B – Responsible Authorities

Gloucestershire Constabulary
Licensing Unit,
No 1 Waterwells, Waterwells Drive,
Quedgeley
Gloucester
GL2 2AN

Switchboard: 101
Email: licensing@gloucestershire.police.uk

Gloucestershire Fire and Rescue Service
Service Delivery Support
Waterwells Drive
Quedgeley
Gloucester
GL2 2AX

Tel: 01452 753333
Email: fire.safety@glosfire.gov.uk

Pollution Prevention
Environmental Protection
Public Protection
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

Tel: 01242 264135
Email: EnvHealth@cheltenham.gov.uk

Health and Safety Enforcement
Where the local authority is the enforcing authority

Cheltenham Borough Council
Health and Safety – Environmental Health
Public Protection
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

Tel: 01242 264135
Email: EnvHealth@cheltenham.gov.uk

Where the HSE is the enforcing authority

Health and Safety Executive
4th Floor, The Pithay
All Saints Street
BRISTOL
BS1 1ND

Telephone: 0117 988 6000
Fax: 0117 926 2998
Email: (i) For service employment e.g. Central and Local Government, NHS etc. the contact is paula.Johnson@hse.gsi.gov.uk
(ii) For other employment e.g. manufacture and repair, agriculture, transport, the contact is nigel.chambers@hse.gsi.gov.uk

Local Planning Authority

Planning Enforcement
Built Environment Division
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 1PP

Tel 01242 264138
Email: planning@cheltenham.gov.uk

Child Protection
Gloucestershire Safeguarding Children Board
Block 4, 1st Floor, Room 133B,
Shire Hall,
Westgate Street,
Gloucester,
GL1 2TH

Tel: 01452 583629
Email: gscb@gloucestershire.gov.uk

Trading Standards
Gloucestershire County Council, Trading Standards,
Hillfield House
Denmark Road
Gloucester
GL1 3LD

Tel: 01452 426201
Email: tradstds@gloucestershire.gov.uk

Responsible Authority for Health
Public Health Department
Block 4, 2nd Floor
Gloucestershire County Council
Shire Hall, Westgate Street, Gloucester GL1 2TG

Tel: 01452 328699
Email publichealth@gloucestershire.gov.uk

Cheltenham Borough Council Licensing
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

Tel: 01242 264135
Email: licensing@cheltenham.gov.uk

Home Office Immigration Enforcement

Email: alcohol@homeoffice.gov.uk

Appendix C – Pool of Model Conditions

Introduction

The conditions shall not be regarded as “standard conditions” which are to be automatically imposed on premises licences and certificates in all cases. The following are designed to provide a range of possible conditions which may need to be attached to premises licences or club premises certificates, depending upon differing situations.

All conditions attached to a premises licence and club premises certificate must be appropriate and proportionate to the application received.

The wording of the conditions may need to be modified to suit a particular premise and/or situation.

This is not an exhaustive or exclusive list of conditions.

Additional conditions may be drafted and attached to such licences and certificates to meet individual circumstances, both by the applicant in question, any responsible authority, or the Licensing Authority as deemed appropriate.

The majority of conditions refer to the ‘premises licence holder’ however, in some circumstances, it may be more appropriate for the designated premises supervisor to be responsible for complying with the condition. In these circumstances, the conditions can be amended to read ‘the designated premises supervisor or a competent person nominated by the designated premises supervisor’.

C&D – The Prevention of Crime & Disorder | **PN** – The Prevention of Public Nuisance | **CP** – Protection of Children from Harm | **PS** – Public Safety

Reference	Model Condition	Primary Licensing Objective*
Sale of Alcohol		
	There shall be a personal licence holder on duty on the premises at all times when the premises are authorised to sell alcohol.	C&D CP
	No super-strength beer, lagers or ciders of 5.5% ABV (alcohol by volume) or above shall be sold at the premises.	C&D CP
	No single cans or bottles of beer or cider shall be sold at the premises.	C&D CP

	No more than x% of the sales area to be used at any one time for the sale, exposure for sale, or display of alcohol.	C&D CP
	Sales of alcohol for consumption off the premises shall only be supplied with, and ancillary to, a take-away meal.	C&D CP
	Alcohol shall only be sold to a person sitting down eating a meal and for consumption with that meal.	C&D
	Alcohol may only be sold to persons having a table meal or those waiting to be seated prior to having a table meal.	C&D
	Alcohol shall be sold to customers by waiter/waitress service only.	C&D
	There shall be no sales of alcohol for consumption off the premises.	C&D CP
	Alcohol consumed outside the premises shall only be consumed by patrons seated at tables.	C&D PN
	Any alcohol supplied for consumption off the premises must be in a sealed container.	C&D
	Substantial food and non-intoxicating beverages, including drinking water, shall be available in all parts of the premises where alcohol is sold or supplied for consumption on the premises during the periods when alcohol is authorised for sale.	C&D
Management of the Premises		
	A 'Winding-down and Dispersal' policy shall be adopted that includes measures to achieve a gradual and orderly dispersal of customers at the end of the trading session. These measures shall commence at least 15 minutes before the bar closes, and shall include slowing down the tempo of music, a significant reduction in the volume of music and announcements requesting customers to leave the premises quietly and respect the peace and quiet of the local residents.	C&D PN
	A direct telephone number for the manager at the premises shall be publicly available at all times the premises is open. This telephone number is to be made available to residents in the vicinity.	C&D PN

	The Designated Premises Supervisor or premises license holder shall bring the contents of the licence and licence conditions to the attention of all door supervisors and other staff employed at the premises.	C&D PN CP PS
	CCTV	
	A CCTV system consisting of a minimum of x cameras shall be installed at the premises. The CCTV system shall be maintained in good working order, shall record at all times the premises are open, and recordings shall be kept for a minimum of 14 days and be provided on DVD to officers of the authority, Trading Standards or Police on request.	C&D
	A staff member from the premises, who is conversant with the operation of the CCTV system, shall be on the premises at all times when the premises are open to the public. This staff member must be able to show the Police or Licensing Officer recent data or footage with the absolute minimum of delay when requested to do so.	C&D
	No alcohol shall be sold if the CCTV equipment is inoperative for any reason.	C&D CP
	Radios	
	The premises licence holder shall join the Night Safe radio scheme or any similar scheme operating in the town and ensure that: • The communication equipment is kept in working order at all times. If the communication equipment breaks then the Police shall be notified and the equipment shall be repaired within a reasonable time period; • The communication equipment shall be activated, made available to and monitored by the designated premises supervisor or a responsible member of staff at all times that the premises are open to the public; • Any police instructions/directions are complied with whenever given; and • All instances of crime and disorder are reported via the communication equipment by	C&D

	the designated premises supervisor or a responsible member of staff to an agreed police contact point.	
Best Practice Scheme		
	The Designated Premises Supervisor shall maintain an active membership of the Night Safe (or successor 'pubwatch') including operation of the Nightsafe radio link.	C&D
Door Supervisors		
	A minimum of x SIA licensed door supervisor shall be on duty at the premises at all times whilst it is open to the public [or after xx.xx / until the last admission time for the public].	C&D
	If door supervisors are required to undertake body searches then at least one female supervisor shall be available to undertake the body searches of female customers.	C&D
	A written search policy that aims to prevent customers or staff bringing illegal drugs, weapons or other illegal items onto the premises at any time shall be in place and operate at the premises.	C&D
	Where door supervisors are required the premises licence holder [or Designated Premises Supervisor] shall keep records showing the names of the supervisor, their SIA badge number & expiry date, and the date/time that they were employed. A copy should be available immediately upon request to an authorised officer of Gloucestershire Constabulary or the authority.	C&D CP
	All staff engaged outside the entrance to the premises, or supervising or controlling queues, shall wear high visibility jackets or vests.	C&D
	For a period of 30 minutes following the closure of the Bar, or until all customers have dispersed from the immediate vicinity if longer, there shall be a minimum of x door supervisors on the street outside the premises wearing high-visibility clothing to ensure the safe, orderly and quiet dispersal of customers in the immediate vicinity.	C&D PN

Hours		
	Consumption of alcohol shall cease x minutes after the time authorised for its sale or supply/provision of licensable activities.	C&D PN
Entry to Premises		
	No public access to the premises shall occur through the [specify doors/area]. This condition shall not restrict the use of the doors in the event of an emergency.	C&D CP PS
	There shall be no entry or re-entry, other than staff members, to the premises after xx.xx save for customers using the agreed smoking area at the premises.	C&D PN
	On occasions where licensable activities are carried on past xx:xx hours, admission of customers will be restricted to [enter restriction e.g. a particular entrance, a particular area of the licensed premises etc].	C&D
	In relation to the specified function room there shall be no admission after x other than to: (1) residents of the hotel and their bona fide guests; or (2) persons attending the pre-booked function	C&D
	All functions in the *specified function room* shall be pre-booked or ticketed events.	C&D PN
	No events solely for those under 18 will be permitted on the premises.	C&D CP
	The rules of admission to the premises shall be clearly and prominently displayed at each entrance to the Premises.	C&D CP
Alcoholic Containers		
	No glass bottles containing beverages of any kind, whether open or sealed, shall be given to customers on the premises whether at the bar or by staff serving away from the bar.	C&D PS

	No customers carrying open or sealed bottles shall be admitted to the premises at any time that the premises are open to the public.	C&D
	The premises licence holder/designated premises supervisor shall ensure that no customers shall take glasses or open bottles from the premises other than into the outside area shown and edged [red] on the plan forming part of the premises licence.	C&D PN
	The premises licence holder shall ensure that only plastic or toughened glass containers will be used for the supply of beverages.	C&D
	There shall be no sale of alcohol in unsealed containers for consumption off the premises.	C&D
Notices/Signage		
	The premises licence holder shall ensure that a sign, indicating the hours during which licensable activities are permitted to take place, is displayed in, on or immediately outside the premises in a position where the notice can be conveniently read by members of the public.	C&D PN
	The premises licence holder shall ensure that a sign, detailing any restrictions on the admission of children, is displayed on or immediately outside the premises in a position where the notice can be conveniently read by members of the public.	CP
Drugs		
	The Designated Premises Supervisor shall complete/attend a recognised 'drug awareness' training course [within **** weeks/by **** date, or the DPS shall have completed/attended such training].	C&D
	Staff shall be provided with 'drug awareness training', and be briefed on the drugs policy applicable to the premises.	C&D
	Any person found with illegal drugs must be reported to a Police officer immediately.	C&D
	Whilst licensable activities are taking place, the toilets at the Premises must be checked at least hourly for	C&D

	illegal drug use or supply. A written log of all checks must be kept at the Premises for at 31 days and made available for immediate inspection on the request of an authorised officer of Gloucestershire Constabulary or the Licensing Authority.	
Promotions		
	There shall be no promotional sales of alcohol at the premises where alcohol is sold at a price lower than that at which the same or similar alcoholic drinks are sold, or usually sold, on the premises.	C&D
	There shall be no payment made by or on behalf of the licence holder to any person for bringing customers to the premises.	C&D
	28 days' notice shall be given to Gloucestershire Constabulary and the licensing authority of any events held which are organised by an outside promoter, including full details of the nature of the event and of the promoter.	C&D
Records		
	An incident log shall be kept at the premises and made available on request to the Police or an authorised officer of the authority. The log will record the following: • all crimes reported to the venue • all ejections of customers • any incidents of disorder (disturbance caused either by one person or a group of people) [There is no requirement to record the above incidents (a), (b) or (c) where they do not relate to a licensable activity] • seizures of drugs or offensive weapons • any faults in the CCTV system or searching equipment or scanning equipment • any refusal of the sale of alcohol during the hours the premises is licensed to sell it	C&D
Premises Layout		

	The following alcoholic beverages shall be placed behind a staffed counter: • mixed alcoholic beverages under 10% a.b.v. • beers or ciders over 5.5% a.b.v.; and • all spirits in bottles less than 70cl.	C&D CP
	At least x members of staff shall be on duty on the shop floor between **** hours until closing time.	C&D
	The physical location of alcohol displays shall be in an area within sight of staff as identified on the plan of the premises annexed to the licence.	C&D CP
	The XX area shall be designated as a “chill-out” area whilst music and dancing are permitted on the premises which shall include adequate ventilation or fresh air; ready access to free drinking water; suitable seating accommodation; and access to First Aid facilities	C&D
	Seating for no less than [specify number] persons shall be provided in the premises at all times the premises are [specify “open” or “are providing any licensable activity”].	C&D
Use of Outdoor Area		
	The designated premises supervisor shall ensure that tables are cleared of all bottles and glasses on a regular basis during trading hours to avoid an accumulation of glassware.	C&D PN
	Customers will not be permitted to drink outside the premises save for in any seated area authorised under a pavement licence.	C&D PN
Disabled People		
	The premises licence holder shall ensure that, when disabled people are present, adequate arrangements exist to enable their safe evacuation in the event of an emergency and that disabled people on the premises are made aware of those arrangements.	PS
First Aid		
	The premises licence holder shall ensure that an adequate and appropriate supply of first aid	PS

	equipment and materials is available on the premises and at least one suitably trained first aider shall be on duty when the public are present and if more than one suitably trained first aider that their respective duties are clearly defined.	
	The Licensee shall ensure that at all times when the public is present there is at least one competent person able to administer First Aid, that an adequate and appropriate supply of First Aid equipment and materials is available on the Premises and that adequate records are maintained in relation to the supply of any First Aid treatment.	PS
	Lighting	
	The premises licence holder shall ensure that, in the absence of adequate daylight, the lighting in any area accessible to the public, members or guests shall be fully operational when the public, members or guests are present.	C&D PS
	Special Effects	
	Any special effects or mechanical installation should be arranged and stored so as to minimise any risk to the safety of the audience, performers and staff.	PS
	The following special effects will only be used on 10 days prior notice being given to the Licensing Authority and Environmental Health where consent has not been previously been given: • dry ice machines and cryogenic fog • smoke machines and fog generators • pyrotechnics including fireworks • real flame • fire arms • motor vehicles • strobe lighting • lasers • explosives and highly flammable substances	PS
	These special effects must only be used on the provision of a suitable and sufficient risk assessment and prior notification to the Licensing Authority and Environmental Health.	PS

	All escape routes and exits shall be kept unobstructed, in good order with non-slippery and even surfaces, free of trip hazards and clearly identified.	PS
	All exit doors shall be regularly checked to ensure that they function satisfactorily and a record of the checks shall be kept on the premises.	PS
Noise Nuisance (regulated entertainment)		
	The lobby doors at the premises shall be kept closed except for access and egress during the provision of regulated entertainment. Door staff, where employed, shall ensure that the doors are maintained closed as far as possible when regulated entertainment is taking place.	PN
	A noise limiting device shall be installed, fitted and maintained in such a manner so as to control all sources of amplified music at the premises during the provision of regulated entertainment. The noise limiting device shall be set at a limit determined by the Local Authority's Authorised Officer, such level being confirmed in writing to the premises licence holder.	PN
	Whenever any regulated entertainment occurs past 22:00 indoors all windows and doors shall be kept shut during these activities.	PN
	Loudspeakers shall not be located in the entrance lobby, [or specify another location if appropriate] or outside the premises.	PN
	Live music shall be provided by no more than two (2) performers on any day.	PN
	After 23:00 hours all windows shall be closed and remain closed.	C&D PN
	Unless otherwise specified on this licence no regulated entertainment shall take place at the premises with the exception of pre-booked private events limited to the provision of music and dancing for pre-invited guests.	C&D PN
	Where any regulated entertainment occurs at the premises, the Designated Premises Supervisor, or a	PN

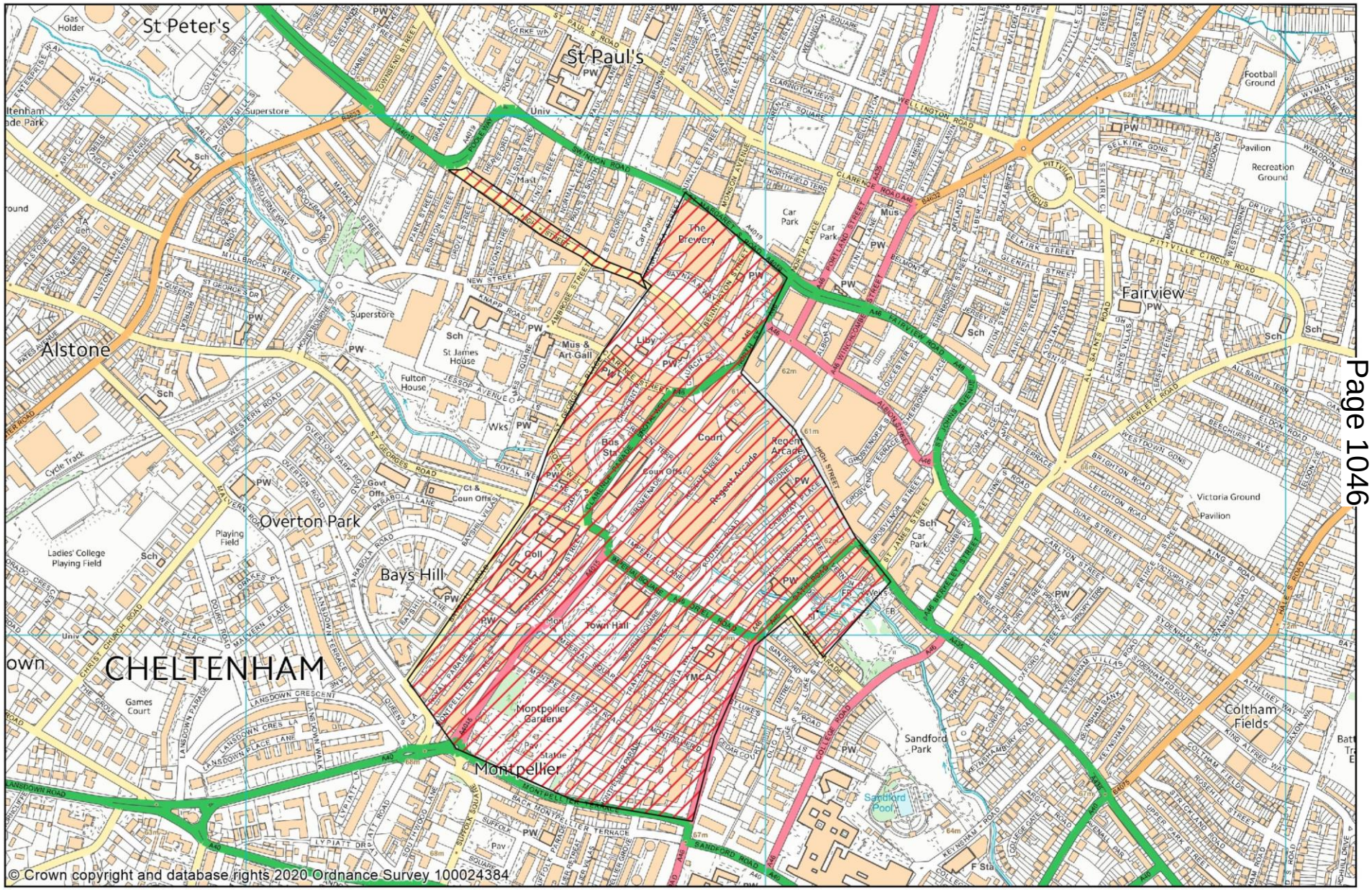
	person nominated by them, will ensure that noise from such activities is effectively inaudible inside the nearest noise sensitive premises.	
Noise Nuisance (people)		
	Prominent, clear notices shall be displayed at [all exits / in the beer garden] requesting customers to respect the needs of local residents and leave the premises and the area quietly.	PN
	The premises licence holder shall monitor the activity of persons leaving the premises [after xx:xx/are closed to the public] and remind them of their public responsibilities where necessary.	PN
	Customers permitted to temporarily leave and then re-enter the premises e.g. to smoke, shall not be permitted to take drinks or glass containers with them.	C&D PN
	Deliveries to the premises shall only be made between **:** hours and **:** hours on Mondays to Saturdays only.	PN
	The pavement from the building line to the kerb edge immediately outside the premises, including gutter/channel at its junction with the kerb edge, shall be swept and or washed, and litter and sweepings collected and stored in accordance with the approved refuse storage arrangements.	PN
Lighting		
	Internal and external lighting provided for the purpose of customer and staff safety and for the security of the premises shall be positioned so as not to cause nuisance to neighbouring or adjoining properties.	PN
	Lighting associated with regulated entertainment shall be positioned so as not to cause nuisance to neighbouring or adjoining properties.	PN
	Lighting provided externally to promote advertising of the premises or activities associated with the premises shall be of an intensity such as not to cause nuisance to neighbouring or adjoining properties.	PN

Open Spaces		
	The area within which alcohol is served or consumed shall be clearly and effectively delineated using barriers, ropes, or similar so that the extent of the Designated Place where the licensable activity is temporarily permitted shall be clearly defined and notices shall be conspicuously placed in the area.	C&D PN
	Music noise levels from outdoor regulated entertainment must not exceed those defined in the Code of Practice on Environmental Noise Control at Concerts' (The Noise Council 1995 ISBN 0 900103 51	PN
	Use of the outdoor area will cease at 23:00 everyday.	PN
Other Nuisance		
	A public refuse bin shall be installed outside the premises subject to any necessary planning permission or listed building permission.	PN
	The premises licence holder shall ensure that any queue to enter the premises which forms outside the premises is orderly and supervised by door staff so as to ensure that there is no public nuisance or obstruction to the public highway.	C&D PN
Litter		
	At the termination of business on each day the outside area immediately to the front of and adjacent to the premises shall be cleared of debris and litter.	PN
Other		
	In cases of an event involving a significant number of unaccompanied children, the premises licence holder shall have a child protection policy in place to carry out suitable checks on staff before they take up employment.	CP
	A Challenge [21/25/or any other suitable age] policy shall be operated at the premises at all times. All staff shall require identification of all customers who appear to be less than [21/25/ or any other suitable age] years old and wish to purchase alcohol. Acceptable proof of age will be a PASS approved	CP

	proof of age card, UK passport or a UK photographic driving licence.	
	Challenge [21/25/ or any other suitable age] materials shall be displayed at the premises, including at the point of sale of alcohol, to inform customers of the operation of the scheme.	CP
	A log shall be kept at the premises and record all refused sales of alcohol for reasons that the person(s) is, or appears to be, under x years of age. The log shall record the date and time of the refusal and the name of the member of staff who refused the sale. The log will be made available on request by the Police or an authorised officer of the authority.	CP
	Children under the age of x years shall not be allowed on the premises after **:** hours unless accompanied by an adult.	CP
	Children under the age of x years shall not be allowed on the premises.	CP
	No single cans or bottles of beer or cider shall be sold at the premises.	C&D CP
	Clearly visible signage is to be displayed at the entrances and at points of sale indicating it is illegal to sell alcohol to people under the age of 18.	CP
	The licence holder or the licence holders, servants, or agents, shall ensure that no flyposting is undertaken by the licence holder or on behalf of the licence holder in respect of any performance or event taking place at the premises.	PN C&D
Queuing		
	Any designated queuing area shall be enclosed within appropriate barriers to ensure that the highway is kept clear.	C&D
Dispersal		
	A minimum 30 minute ‘drinking-up’ time shall be provided to allow appropriate dispersal, use of lavatories etc.	C&D PN

	A written dispersal policy shall be in place and implemented at the premises to move customers from the premises and the immediate vicinity in such a way as to cause minimum disturbance or nuisance to neighbours.	C&D CP
	Freephones or payphones shall be made available to all customers and have displayed contact telephone numbers for selection of hackney carriages and private hire services.	PN
Boxing & Wrestling		
	At least 28 days' notice of any event involving boxing or wrestling entertainment events shall be provided to the licensing authority and the health and safety enforcing authority.	C&D

Appendix D – Designated Area of Concern



Licensing Act Statement of Licensing Policy consultation feedback

Total number of responses received: 7 including licensing committee

Comments shown in black Assessment of comments in red

Licence Holder

Agrees with all proposals.

Dave Jones, Gloucestershire Safeguarding Children Partnership Business Manager

- Agrees with additional information on personal licences/annual fees – but stated does not have knowledge of these areas
- Inclusion of section on women's safety and wider vulnerability - Yes, this also should include risks of Criminal Exploitation of children and vulnerable adults and the sexual exploitation of children. It would be worth contacting the police and asking to speak to someone from the Public Protection Team on this matter, or the District safeguarding lead Tracy Brown How to report safeguarding/exploitation concerns has been added
- Other comments: The policy requires a revision regarding the designation of Responsible Authorities in relation to Child Protection. It is essential that the document references both the GSCP Published Arrangements and the Working Together to Safeguard Children statutory guidance, as these are critical for any organisation that comes into contact with children. Such organisations have a duty to understand and act upon their safeguarding responsibilities and importantly know what do if they have a concern about a child. Updated
  Additionally, the GSCB no longer exists, and any contact details associated with it are invalid. Updated
  The designation of Responsible Authorities must be assigned to specific organisations, not to a partnership. A partnership is not a defined legal entity for this or a statutory purpose. The GSCP, as a partnership, has formally identified Gloucestershire Constabulary (Police) and Public Health as the Responsible Authorities, given their roles as principal safeguarding partners. Gloucestershire Fire and Rescue Service, as a GCC service, also falls into this category as GCC is a primary safeguarding partner, that's GCC as a whole and not GCC Children's Services.
  Where safeguarding concerns are identified by either the Licensing Team or the Responsible Authorities, these should be communicated directly to the GSCP Business Unit with sufficient detail. This enables the Business Unit to coordinate appropriate feedback and safeguarding advice to the relevant District. This process is clearly outlined in the GSCP's Published Arrangements, which were agreed with GLOG in 2021. Most Gambling Act Statements already reflect this arrangement, with some clear errors that too will need updating, and it should be consistently replicated in all Licensing Policies.
  I will be attending the next GLOG meeting to discuss this further with Tracy Brown from CBC
  Lastly, I may have missed it, but I didn't see any reference to the licensing of taxi drivers or other drivers, including the associated safeguarding processes in this area. This may be covered in a separate document, but I wanted to raise the question for clarification as the recent National Baroness Casey Report has a clear recommendation nationally that needs to be considered relating to the licensing of drivers. This has been covered at County officers meeting in September

Cllr David Willingham

- Agrees with personal licence/annual fee
- Women's safety section - This is lots of fine words, but provides no way to require premises to actually operate such a scheme. There should be a model condition that can be all relevant premises, requiring the operator operate a "Welfare and Vulnerability Engagement" scheme, such as "Ask for Angela", as operating a scheme is justified in respect of public safety and preventing crime and disorder We cannot force premises to promote the scheme as it is not mandatory. However, this is promoted as good practice and the LA fully supports how useful these schemes can be. It will be considered as part of the charter measures when this work is carried out in 2026
- Other comments: The policy is silent of issues such as illegal electric motorbikes being used for deliveries by premises with late night refreshment licences. The policy seems to mainly focus on sale of alcohol, but late night refreshment needs further controls. There needs to be a model condition applied drafted and to late night refreshment licences requiring safeguarding training for staff and associated record keeping, as such premises are attractive to children and therefore attractive to those seeking to exploit children. The hours for licensable activity such as off-licences, may need different timings for it town, and also to accommodate large 24h shopping premises such as supermarkets. Again, this is not something we can mandate. Have updated document to reflect good practice.
  Delivery vehicles outside of licensing remit
  Takeaway food premises need public nuisance conditions to manage light pollution, and issues associated with congregation of delivery vehicles. Stronger conditions are required to tackle fly-posting, for example requiring to keep a log of all events promoted by third parties, or even to consider requiring venues to hold a deposit in escrow that can be claimed against for removal costs by a highway authority or principle litter authority if fly-posing related to an event is found within 28 days of the event. Fly-posting is a crime so having conditions to prevent or deter it seems reasonable and lawful. The policy should provide indicative timelines so that applicants can be clear how long in advance of opening or one-off events they need to apply, especially for events where a SAG is needed.
  Conditions around CCTV should look to align the required conditions to align with relevant British Standards such as BS EN 62676 to ensure that picture quality, storage, logging, data authentication, time stamping, tamper detection, etc. meet a measurable standard

Home Office (Immigration)

Change of address Updated

Home Office
Immigration Enforcement
Licensing Compliance Team (LCT)
2 Ruskin Square
Dingwall Road
Croydon
CR0 2WF

Email: IE.licensing.applications@homeoffice.gov.uk

GCC Public health

Comments here **Public health feedback.docx**

Reference to the pledge removed as this work has not progressed. Updated with reference to purple flag/ENTE work and aspiration to produce a charter for Cheltenham. Will refer request for updates on domestic abuse/sexual violence partnership boards be referred to community safety to feed back to GCC.

Cllr Steve Harvey

8.6. Integrating Strategies & Specific Policies

8.1 The authority has a proven track record of partnership work and will continue to work in partnership with the police, local residents, businesses, licensees, communities and regulatory agencies towards safeguarding the quality of life for residents, and the creation of a safer and more pleasant environment for all. The authority has a very committed set of Councillors who join in the partnership work. Comment. Poorly worded comment but the sentiment is there

8.2 In particular, Cheltenham has an award winning (PURPLE FLAG) vibrant night-time economy that far exceeds other towns of similar sizes. The town offers a rich choice of entertainment and facilities making it a destination attracting usually high numbers of visitors, some travelling considerable distances to enjoy what the late night economy has to offe Document updated

Licensing Committee

2. Women's safety wider vulnerability

Cllr Willingham: Yes, agree with it. Comment to make unless it has been missed – are there any new conditions in the back of document requiring premises to operat the scheme or successor. Going form marked up copy of pool of conditions – can't see a condition that says should operate ask for angela or ask for clive. Need to offer condition that requires premises to operate these schemes. Need to look at which types of premises we would generally put that condition on pub clubs etc. But also, potentially anywhere that gets LNR licences as people going into this LNR may have been in premises before and there may be unwanted 'hangers on' for patrons of LNR.

MB: No proposed conditions – not a mandatory condition – voluntary scheme so mindful of enforcing condition. Police may require it as part of consultation and scheme being promoted by police. May look at charter which is work in progress.

Pemberton: Also support it. Southam and Rising Sun pub- has signs about operation of ask for Angela. Like that we're looking at safety of woman but addendum to add looking after woman as well as men as men often not included. As per comments above

3. Suspension of premises and club premises for non-payment of fees

No comments

4. Any further comments regarding statement of licensing policy draft

DW: 3.33 – protection of children from harm – applicants to give consideration to protecting children from harm. Believes we need to also cover LNR licences on this as an evidential background from a historic news article from the mirror form 29 March 2016 which says that teenage girls groomed by McDonalds burgers and drugs relating to grooming scandal. LNR premises are attractive to young people including vulnerable children and as a result those who seek to exploit them. Requirement on new license that staff in LNR must complete mandatary annual SG training and that applicant/DPS must maintain records to be inspected by LA or constabulary. Model condition to include on those premises. Expectation of what to expect from LNR premises in the policy. As per comments above

8.54 – for pubs bars nightclubs we segregate town centre vs residential terminal hour – should there be something similar in relation to ff licences. Is a terminal hour after 23:00 more acceptable for off licence in core central area. Are 24-hour supermarkets that might wish to supply for 24-hour licence to sell alcohol something that might be deemed acceptable. Balance between area – is it safe/suitable are they a responsible applicant. Freedom of people to purchase alcohol as and when deemed fit differentiation vs operating in different areas. No change – difficult to distinguish between residential/town centre as town centre is evolving with more residential premises

Model conditions to tackle flyposting. Bristol city council have optional condition which can be applied via licensing review where they are required to maintain a logbook of all promoters so that LA Constabulary and principal litter authorities can find out who it was flyposting. Is it lawful to go further and a premises continue to fly post that we can ask them for events known to be fly posted – that premises holds considerable sum of money in escrow by promoter that if evidence of flyposting exists that money form deposit in escrow is used to clear fly posting instead of public funds.

SW – law changed several years ago where if a fly poster at a venue put up posters – a third party using a premises could see the venue rather than the promoter be the ones prosecuted for fly posting.

MB – correct – outside of licensing remit to enforce fly posting. Will take away model condition re: maintaining a logbook – we can provide details to relevant authori Expect holding money outside of remit. Asks if legal rep has anything to add – no.

Equality Impact Assessment

Introduction

An Equality Impact Assessment (EqIA) is a method for assessing the effects or impacts of a council policy or function on removing barriers to equality.

The Equality Act 2010 includes a public sector equality duty which requires public authorities to try and eliminate discrimination; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it and promote equality and good relations across a range of protected characteristics.

The protected characteristics are:

Age	Disability	Gender Reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief (including lack of belief)	Sex	Sexual orientation

An EqIA should be completed with the full range of protected characteristics considered during the initial stages of developing new strategies, policies, functions or services, prior to starting a procurement exercise and before decisions are made.

Examples of when an EqIA should be completed are:

• Any proposals to introduce or add to a service	• Any proposals to adopt policy priorities, strategies and plans
• Any proposals to remove, reduce or alter a service	• Changes to staffing structure where groups of employees are likely to be negatives affected
• Any new policies or changes to policies	• Any proposals in relation to procured or commissioned services

Stage 1 - Equality Screening

Whenever a policy/service or function is reviewed, changed, developed or removed an initial equality impact assessment stage 1 will need to be undertaken. This is a screening template and will help establish whether a full assessment is needed. This should be done at an early stage of the process so that it is part of policy development.

Stage 2 – Equality Impact Assessment

This is the full EqIA and seeks to identify the equality considerations that have bene taken into account including any mitigating actions proposed and ensures decisions are based on evidence. The EqIA will need to be agreed with the appropriate Head of Service or Director and should be included on the decision making report, along with commentary on the assessment in the main body of the report.

STAGE 1 – Equality Screening

1. Identify the policy, project, function or service change

a. Person responsible for this EqIA	
Officer responsible: Michelle Bignell	Service Area: Public Protection
Title: Licensing and Public Protection Manager	Date of assessment: October 2025
Signature:	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
Is this new or existing?	**Already exists and is being reviewed**
Please specify reason for change or development of policy, function, strategy, service change or project	
Policy review	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	To review the Statement of Licensing Policy in accordance with statutory requirements
Objectives:	
Outcomes:	
Benefits:	

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Positive**

Please provide an explanation for your answer:

The Licensing Act 2003 Policy sets out how the Council will discharge its functions with a view to promoting the licensing objectives of preventing crime & disorder, preventing public nuisance, public safety and protecting children from harm.

The Policy applies to all applicants and licence holders equally, regardless of any characteristics under the Equality Act 2010. Similarly, any decisions made, such as whether to grant or refuse a licence are made according to the objectives and criteria in the Policy and are taken irrespective of an applicant or licence holders characteristics.

The Policy revision for 2025 also suggests improvements which will benefit those groups with protected characteristics and proposes measures such as expectations on applicants/licence holders to provide stronger protections for vulnerable persons and women/girls.

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate	
Stage Two required	**Yes**
Owner of Stage Two assessment	**Michelle Bignell**
Completion date for Stage Two assessment	**30 October 2025**

STAGE 2 – Full Equality Impact Assessment

2. Engagement and consultation

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

a. Research and evidence
List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.
Full consultation carried as laid out in section 7 of the report. Evening and Nighttime Economy (ENTE) working group has been formed to deliver the revised strategy for the Borough for the 2026 purple flag accreditation. Various stakeholders sit on the group including a VAWG representative, accessibility forums and LBTQ+ representative. An aspiration of this group is that a Charter is devised that businesses can sign up to demonstrating their commitment to a safe premises.

b. Consultation	
Has any consultation be conducted?	**Yes**
As set out in 6.1 of report.	

3. Assessment

a. Assessment of impacts

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

DRAFT

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Neutral		
	Younger People (16-25)	Positive	Promoting an awareness of VAWG and safeguarding/exploitation signs in all licensed premises.	Developing a Charter for all ENTE premises to sign up to. Partnership working with the Gloucestershire Safeguarding Children's Partnership (GSCP).
	Children (0-16)	Positive	Promoting an awareness of VAWG and safeguarding/exploitation signs in all licensed premises.	Developing a Charter for all ENTE premises to sign up to. Partnership working with the Gloucestershire Safeguarding Children's Partnership (GSCP).
DISABILITY A definition of disability under the Equality Act 2010 is available here. *See also carer responsibilities under other considerations.*	Physical disability	Neutral		
	Sensory Impairment (sight, hearing)	Neutral		
	Mental health	Neutral		
	Learning Disability	Neutral		
GENDER REASSIGNMENT		Positive	Promoting inclusivity and an awareness of VAWG in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.
MARRIAGE & CIVIL PARTNERSHIP	Women	Positive	Promoting inclusivity and an awareness of VAWG in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.
	Men	Positive	Promoting inclusivity and ensuring a safe space in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.
	Lesbians	Positive	Promoting inclusivity and an awareness of VAWG in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.
	Gay Men	Positive	Promoting inclusivity and ensuring a safe space in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.

PREGNANCY & MATERNITY	Women	Neutral		
RACE* Further information on the breakdown below each of these headings, is available here. For example Asian, includes Chinese, Pakistani and Indian etc	White	Neutral		
	Mixed or multiple ethnic groups	Neutral		
	Asian	Neutral		
	African	Neutral		
	Caribbean or Black	Neutral		
		Neutral		
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Neutral		
SEX (GENDER)	Men	Positive		
	Women	Positive	Promoting inclusivity and an awareness of VAWG in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.
	Trans Men	Positive	Promoting inclusivity and ensuring a safe space in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.
	Trans Women	Positive	Promoting inclusivity and an awareness of VAWG in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.
SEXUAL ORIENTATION	Heterosexual	Positive	Promoting inclusivity and an awareness of VAWG in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.
	Lesbian	Positive	Promoting inclusivity and an awareness of VAWG in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.
	Gay	Positive	Promoting inclusivity and ensuring a safe space in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.
	Bisexual/Pansexual	Positive	Promoting inclusivity and an awareness of VAWG in all licensed premises.	Developing a Charter for all ENTE premises to sign up to.

Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Neutral		
Rurality i.e. access to services; transport; education; employment; broadband		Neutral		
Other (e.g. caring responsibilities)		Neutral		

* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available here

DRAFT

4. Outcomes, Action and Public Reporting

a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer

b. Public reporting

All completed EqIA's are required to be publicly available on the Council's website once they have been signed off. EqIA's are also published with the papers for committee and full council decisions.

Please send completed EqIA's to [email address]

5. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

6. Change log

Name	Date	Version	Change

DRAFT

This page is intentionally left blank

Cheltenham Borough Council

Cabinet – 18 November 2025

Review of Taxi and Private Hire Licensing Policy (Emissions Policy)

Accountable member:

Councillor Victoria Atherstone, Cabinet Member for Safety and Communities

Accountable officer:

Michelle Bignell, Licensing and Public Protection Manager

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

Following the adoption of the revised Taxi and Private Hire Licensing Policy in July 2025, a review of the proposed 2030 emissions policy has been conducted and concluded. Revised wording was sent to key stakeholders (para. 4.1) and cabinet members for feedback. Comments received have informed the revised emissions policy for approval

Recommendations: that Cabinet:

1. **adopts the revised wording in relation to the 2030 target date for emissions as laid out in paragraph 4.3;**

2. **recommends that the revised wording is incorporated into the Taxi and Private Hire Licensing Policy and that the document is adopted at the December Full Council meeting**

---

1. Implications

1.1 Financial, Property and Asset implications

There are no financial implications arising from this report.

Signed off by: Ela Jankowska – Finance Business Partner

Dated: 27.10.2025

1.2 Legal implications

Cheltenham Borough Council may set its own standards for driver, vehicle and operator licensing whilst also taking statutory guidance and best practice into account.

Consultation must be carried out fairly and the Council will need to carefully and thoroughly assess the impact of introducing the proposed policy, including the effect on the supply of taxis and private hire vehicles in the area. They should also bear in mind the need for a proportionate approach, ensuring that those licence holders that would not meet the criteria can adapt or change their vehicle within a reasonable time.

Signed off by: One Legal, legalservices@onelegal.org.uk

1.3 Environmental and climate change implications

Whilst this adjusted wording in policy may lead to Greenhouse Gases being emitted in the short term, the overall policy supports the long-term transition away from fossil fuel use within the borough. It is recognised that taxi and private hire trade is people's livelihoods within the borough, creating employment and providing services which supports economic activity. The council will continue to work to reduce barriers for licensed taxis and private hire vehicles operating in Cheltenham to be zero-emission vehicles by 2030, in line with the borough's Climate Emergency Action Plan. Efforts through Climate Leadership Gloucestershire will also be made to ensure that there is alignment across the county. The Climate Impact Assessment Tool provides further detail (attached at **Appendix 3**).

Signed off by: Maizy McCann, Climate Officer, Maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Working with residents, communities and businesses to help make Cheltenham #netzero by 2030

- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity
- Being a more modern, efficient and financially sustainable council

1.5 Equality, Diversity and Inclusion Implications

As outlined in **Appendix 4** of this report.

1.6 Performance management – monitoring and review

Through normal service delivery.

---

2 Background

2.1 The authority's current policy was adopted in 2025 after a full consultation. As part of this review, the emissions policy was reviewed, and the proposed wording was considered:

'For hackney carriage vehicles, all vehicles from their renewal date in 2026 must be at least Euro 6 emissions or better and the Authority will only permit replacement applications for existing licence holders from 1st January 2030 and renewal applications from 00:01 hours on 1st January 2030, where the vehicle subject to the application emits zero emissions.
For private hire vehicles, all vehicles from their renewal date in 2026 must be at least Euro 6 emissions or better and it is the Authority's aspiration that it will only permit replacement applications for existing licence holders from 1st January 2030 and renewal applications from 00:01 hours on 1st January 2030, where the vehicle subject to the application emits zero emissions'.

2.2 Due to feedback received during the consultation, the proposed wording was revised for consideration by key stakeholders with a view to implementing later this year:

'The authority will only licence new hackney carriages and private hire vehicles from 1st January 2030 where they are ultra-low emission or zero emission vehicles. Ultra-low Emission Vehicles (ULEVs) produce less than 75g/km of CO_2 tailpipe emissions and have a zero-emission range of at least 10 miles*. It is proposed that 1 January 2030 is the date from which new vehicle licence applications would no longer be accepted for vehicles emitting 75g/km of CO_2 or more.*

This lead period gives time for the trade to prepare, whilst allowing other neighbouring licensing authorities time to consult on and approve this requirement, ensuring a level playing field in the industry across the county and

wider regions. If this is approved, there will be a review of the situation in 2029. If other Gloucestershire licensing authorities have failed to implement a restriction on non-ULEVs vehicles, then it will be recommended that the policy should not be implemented. This is because the authority's own policy will simply be circumvented by the trade 'licence shopping' and applying elsewhere. Thereby, the authority will lose control of those working in the Borough and emissions would not be reduced. The authority will proactively work to encourage neighbouring authorities to implement the same ULEZ or zero-emission vehicle policy'.

3 Current taxi and private hire licensing policy

3.1 The current emissions policy can be viewed on pages 20/21 and 25/26 of the current policy which demonstrates a commitment to reducing carbon emissions by vehicles licensed by the council.

4 Review of emissions policy

4.1 The following stakeholders were consulted on the review:

- Cheltenham Borough Council's air quality team
- Cheltenham Borough Council's climate team
- Gloucestershire County Council decarbonisation team
- Cheltenham Borough Council's cabinet members

4.2 The feedback is attached at **Appendix 2**.

4.3 It is proposed to approve the following wording for vehicle emissions:

Cheltenham Borough Council aims to be carbon neutral by 2030.

• 1 April 2028 - The Council will review the above vehicle policy to consider whether a move to EV or ULEV is appropriate.

• 1 April 2030 (provisional) – Ambition that new vehicle applications and change of vehicle applications will be ULEV or EV.

• 1 April 2033 (provisional) - Ambition that renewal vehicle applications will be ULEV or EV.

EVs are pure electric vehicles with zero tailpipe emissions. ULEVs are currently defined as having less than 75 grams of CO2 per kilometre (g/km) from the tailpipe.

More information is on the vehicle certification agency website

The web page also lists all vehicles that meet the EV and ULEV criteria.

5 Reasons for recommendations

5.1 The proposed wording is the same policy that Stroud District Council and Tewkesbury Borough Council have adopted. This demonstrates alignment and therefore three out of the six district councils in Gloucestershire would have consistent policy approaches to emissions standards.

5.2 Moving forward, there will be a commitment to keeping this approach under review working alongside the licensed trade, the council's climate team and Climate Leadership Gloucestershire and working with the other cabinet members in neighbouring authorities.

5.3 With LGR (local government reorganisation) on the horizon it is a sensible approach to adopt a similar approach as two other authorities that have the highest standard in terms of emissions policies.

6 Alternative options considered

6.1 The Cabinet can decide not to adopt the proposal outlined in the report. However, the trade has been assured that they will be updated in October 2025 with the outcome of this review.

7 Key risks

7.1 As outlined in Appendix 1.

Report author:

Michelle Bignell, Licensing and Public Protection Manager
michelle.bignell@cheltenham.gov.uk

Appendices:

i. Risk Assessment
ii. Review feedback
iii. Climate Impact Assessment Tool
iv. Equality Impact Assessment

Background information:

- Current private hire and taxi policy

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If Cabinet does not resolve to approve the wording the direction will remain unclear and uncertain for the licensed trade.	Head of Public Protection	2	2	3	6	Adopt policy	Licensing and Public Protection Manager	Immediate effect except where dates are specified in policy

This page is intentionally left blank

Vehicle emissions consultation feedback

Consultation:

We have recently conducted a consultation with regards to our aspirations in relation to taxi and private hire vehicle emissions. The proposed wording was:

'For hackney carriage vehicles, all vehicles from their renewal date in 2026 must be at least Euro 6 emissions or better and the Authority will only permit replacement applications for existing licence holders from 1st January 2030 and renewal applications from 00:01 hours on 1st January 2030, where the vehicle subject to the application emits zero emissions.

For private hire vehicles, all vehicles from their renewal date in 2026 must be at least Euro 6 emissions or better and it is the Authority's aspiration that it will only permit replacement applications for existing licence holders from 1st January 2030 and renewal applications from 00:01 hours on 1st January 2030, where the vehicle subject to the application emits zero emissions'.

Due to feedback, we have revised the wording and ask for your views on the wording being implemented later this year:

'The authority will only licence new hackney carriages and private hire vehicles from 1st January 2030 where they are ultra-low emission or zero emission vehicles. Ultra-low Emission Vehicles (ULEVs) produce less than 75g/km of CO□ tailpipe emissions and have a zero-emission range of at least 10 miles*. It is proposed that 1 January 2030 is the date from which new vehicle licence applications would no longer be accepted for vehicles emitting 75g/km of CO□ or more.*

This lead period gives time for the trade to prepare, whilst allowing other neighbouring licensing authorities time to consult on and approve this requirement, ensuring a level playing field in the industry across the county and wider regions. If this is approved, there will be a review of the situation in 2029. If other Gloucestershire licensing authorities have failed to implement a restriction on non-ULEVs vehicles, then it will be recommended that the policy should not be implemented. This is because the authority's own policy will simply be circumvented by the trade 'licence shopping' and applying elsewhere. Thereby, the authority will lose control of those working in the Borough and emissions would not be reduced. The authority will proactively work to encourage neighbouring authorities to implement the same ULEZ or zero-emission vehicle policy'.

Stakeholder comments:

Cllr Paul Baker:

I am very supportive of this proposed change. It gives our taxi drivers more time and is a much more flexible approach which I hope other districts will follow. It also goes some way to helping us achieve our Net Zero ambitions in a more collaborative way,

Gloucestershire County Council:

Thank you for the opportunity to comment on Cheltenham Borough Council's revised proposal regarding taxi and private hire vehicle emissions.

I've reviewed the policies currently in place across Gloucestershire's district councils and compiled a comparative summary to support our response. Based on this review, I would like to offer the following observations:

- **Stroud and Tewkesbury** have adopted clear, phased approaches that transition both new and renewal applications toward ULEV and EV standards, with defined timelines and review points.
- **Cheltenham's revised proposal** aligns with this direction in principle, but its implementation is conditional on neighbouring authorities adopting similar standards. The 2029 review clause, as currently framed, feels more like a fallback than a firm commitment to regional collaboration.
- **Cotswold and Forest of Dean** continue to apply age-based licensing policies, with no defined emissions targets or transition plans.
- **WAV exemptions** are common across districts but vary in application, contributing to inconsistency in enforcement.

Whilst Cheltenham's proposal is broadly in line with the long-term direction of travel, it would be helpful to see a clearer commitment to working with other districts to support a joined-up approach. This would not only benefit current coordination efforts but would also help facilitate smoother transitions as governance structures across the county evolve.

That said, it's important to acknowledge that not all areas of the county are in the same position. More rural districts may face greater challenges in transitioning to EV taxis due to limited charging infrastructure and longer travel distances. We would therefor like to see Cheltenham take a leading role for Gloucestershire. A flexible approach that allows for local variation whilst aligning review points and long-term goals could help reduce licence shopping, support fairer competition, and contribute more effectively to GCC's wider decarbonisation objectives.

Cllr Richard Pinegar, CBC

Thank you for sharing the revised proposal on taxi and private hire vehicle emissions. My apologies that this response is slightly delayed compared to the deadline but importantly, it has been prepared in consultation with the climate team.

I appreciate the thoughtful adjustments made in response to consultation feedback, and I am broadly supportive of the revised wording. While the inclusion of Ultra-Low Emission Vehicles (ULEVs) beyond 2030 does represent a shift from the original ambition of zero-emission-only licensing, I believe we can still achieve a **net zero taxi fleet by 2030** through proactive engagement and regional collaboration.

My priority is to ensure that we **transition to zero-emission vehicles wherever possible**, without destabilising the taxi trade in Cheltenham. Taxi drivers are a vital part of our community, and any policy must balance environmental ambition with economic realism. I believe the market will naturally favour electric vehicles by 2030 due to improvements in affordability and range, and I am committed to working with the trade to support that transition.

To strengthen our position and maintain public trust, I recommend the following additions to the policy wording:

"The authority will work towards ensuring that all licensed hackney carriages and private hire vehicles operating in Cheltenham are zero-emission vehicles by 2030, in line with the borough's Climate Emergency commitment. While ULEVs may be licensed during the

transition, the council will actively support and incentivise the shift to full zero-emission compliance."

"A formal review will be conducted in 2029 to assess progress toward full zero-emission licensing. This review will consider market conditions, regional alignment, and the readiness of the trade, and will inform any necessary policy adjustments to meet the 2030 net zero target."

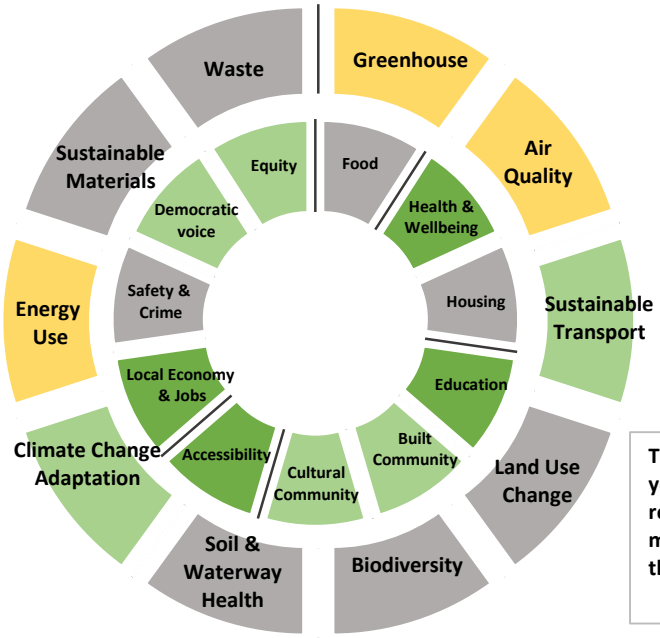
Note that these will require some tracking of vehicles to allow a formal review in 2029, I trust that this is feasible.

I also intend to work closely with **Climate Leadership Gloucestershire** to encourage alignment across neighbouring authorities. A coordinated approach will help prevent licence shopping and ensure that our climate goals are met without disadvantaging local operators.

Thank you again for your work on this important issue.

This page is intentionally left blank

Review of Taxi and Private Hire Licensing Policy - emission polic



Key

	Significant and/or long-term positive impact identified. No changes needed.
	Slight or short-term positive impact identified. No changes needed but could be reviewed to improve.
	Not applicable or no cause for concern.
	Slight or short-term negative impact identified. Review to identify possible improvements.
	Significant and/or long-term negative impact identified. Changes needed before proceeding.

This summary of the CIAT should be used to aid your decision making. Please note that red/amber segments simply mean that mitigations and changes should take place not that the project cannot go ahead.

Environmental	Scores	Justification	Recommendation
GHGs	-1	Following the consultation of the Taxi and Private Hire Licensing Policy in July 2025, it was made clear that the policy expectations needed to be revised to be realistic. The council will continue to aim for licensed taxi's and private hire vehicles operating in Cheltenham are zero-emission vehicles by 2030, in line with the borough's Climate Emergency commitment. While ULEVs may be licensed during the transition, the council will actively support and incentivise the shift to full zero-emission compliance. Efforts through Climate Leadership Gloucestershire will also be made to ensure that alignment across the county. Whilst this adjusted wording in policy may lead to GHG's being emitted in the short term, overall the policy encourages the transitions to zero-emission vehicles.	0
Air quality	-1	For the same reasons stated above.	0
Sustainable Transport	2	This policy in increasing the demand for EV charging infrasturcture within the borough, further supporting the transition to away from fossil fuels and towards a more sustainable transport system.	0
Land use change	0	NA	0

Biodiversity	0	NA	0
Soil and waterway health	0	NA	0
Climate Change Adaptation	2	The policy overall is increasign climate adapation as it is setting the expectations for future vehicle use within the borough to be low emission and not fossil fuel dependent.	0
Energy Use	-2	The transition away from fossil fuel intensive practices heavily relies on electrification, which ultimately will result in higher energy use.	0
Sustainable Materials	0	NA	0
Waste	0	NA	0

Social	Scores	Justification	Recommendation
Food	0	NA	0
Health	8	By adopting the suggested wording this will result in a decrease of emissions relating taxi and private hire vehicle, this will have positive knock on benefits for air quality and therefore the health and wellbeing associated with reduced air pollutants. We have adjusted the target to support the trade, to ensure this policy is achievable.	0
Housing	0	NA	0
Education	4	Many licenced drivers have SEND contracts with educational institutions across the county, therefore this policy needs to support the transition to low emission vehicles in a manageable way, to ensure key services such as this are still able to be carried out.	0
Community	2	The availability of EV charging infrastructure has been a key consideration to why the aspirations within this policy have been adjusted. Currently there is not adequate EV infrastructure to support the 2030 zero emission policy.	0
Culture	2	Ensuring there is access to taxi's and private hire vehicles in essential for supporting cultural and economic activity within the borough, the revision of the 2030 zero emission target supports this.	0

Accessibility	4	The previous policy presented a financial barrier to taxi and private hire drivers, therefore these adjustments in policy allow more time for the trade to financial prepare to comply. Also, the EV sector with become more cost-effective over time.	0
Local Economy and Jobs	4	The taxi and private hire trade is people's livelihoods within the borough, creating employment and providing services which supports economic activity. Therefore, the policy expectations need to be realistic and achievable for this sector and the people who rely on it.	0
Safety	0	NA	0
Equity	1	The adjusted wording of policy ensure fair and just treatment of all taxi and private hire drivers.	0
Democratic Voice	2	Full public consultation occurred initially, this is when we received written feedback from taxi and private hire drivers. Following this, specific stakeholder engagement with relevant CBC & GCC officers and cabinet members to consultant on the revised wording.	0

This page is intentionally left blank

Equality Impact Assessment

Introduction

An Equality Impact Assessment (EqIA) is a method for assessing the effects or impacts of a council policy or function on removing barriers to equality.

The Equality Act 2010 includes a public sector equality duty which requires public authorities to try and eliminate discrimination; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it and promote equality and good relations across a range of protected characteristics.

The protected characteristics are:

Age	Disability	Gender Reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief (including lack of belief)	Sex	Sexual orientation

An EqIA should be completed with the full range of protected characteristics considered during the initial stages of developing new strategies, policies, functions or services, prior to starting a procurement exercise and before decisions are made.

Examples of when an EqIA should be completed are:

• Any proposals to introduce or add to a service	• Any proposals to adopt policy priorities, strategies and plans
• Any proposals to remove, reduce or alter a service	• Changes to staffing structure where groups of employees are likely to be negatives affected
• Any new policies or changes to policies	• Any proposals in relation to procured or commissioned services

Stage 1 - Equality Screening

Whenever a policy/service or function is reviewed, changed, developed or removed an initial equality impact assessment stage 1 will need to be undertaken. This is a screening template and will help establish whether a full assessment is needed. This should be done at an early stage of the process so that it is part of policy development.

Stage 2 – Equality Impact Assessment

This is the full EqIA and seeks to identify the equality considerations that have bene taken into account including any mitigating actions proposed and ensures decisions are based on evidence. The EqIA will need to be agreed with the appropriate Head of Service or Director and should be included on the decision making report, along with commentary on the assessment in the main body of the report.

STAGE 1 – Equality Screening

1. Identify the policy, project, function or service change

a. Person responsible for this EqIA	
Officer responsible: Michelle Bignell	Service Area: Public Protection
Title: Licensing and Public Protection Manager	Date of assessment: October 2025
Signature:	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
Is this new or existing?	**Already exists and is being reviewed**
Please specify reason for change or development of policy, function, strategy, service change or project	
Policy review	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	Update emissions policy for licensed taxi and private hire vehicles
Objectives:	
Outcomes:	
Benefits:	

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Unsure**
Please provide an explanation for your answer:	
It is proposed to approve an emissions policy in terms of carbon neutral aspirations. The cost of ULEV and EV vehicles could be detrimental to the licensed trade should they be forced to comply with a 2030 date. Also, the infrastructure would need to be present to enable licence holders to be able to charge their vehicles.	

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate	
Stage Two required	**Yes**
Owner of Stage Two assessment	
Completion date for Stage Two assessment	

STAGE 2 – Full Equality Impact Assessment

2. Engagement and consultation

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

a. Research and evidence
List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.
The Department for Transport (DfT) best practice guidance (section 8.9) recommends that the local authority delivers a mixed fleet as some designs of wheelchair accessible vehicles may not be suitable for some ambulant disabled passengers. It is recommended that a demand survey is carried out every 5 years. We will commit to working with accessibility groups to deliver this.

b. Consultation	
Has any consultation be conducted?	**Yes**
As set out in 4.1 of report.	

3. Assessment

a. Assessment of impacts

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

DRAFT

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Neutral	None identified	None identified
	Younger People (16-25)	Neutral	None identified	None identified
	Children (0-16)	Neutral	None identified	None identified
DISABILITY A definition of disability under the Equality Act 2010 is available here. *See also carer responsibilities under other considerations.*	Physical disability	Positive and negative	May/may not be enough Wheelchair Accessible Vehicles (WAV's) for demand due to the cost of vehicles	To continue to commit to working with disability groups to ensure that we are regularly assessing the demand for WAV's
	Sensory Impairment (sight, hearing)	Positive and negative	May/may not be enough Wheelchair Accessible Vehicles (WAV's) for demand due to the cost of vehicles	To continue to commit to working with disability groups to ensure that we are regularly assessing the demand for WAV's
	Mental health	Neutral	None identified	None identified
	Learning Disability	Neutral	None identified	None identified
GENDER REASSIGNMENT		Neutral	None identified	None identified
MARRIAGE & CIVIL PARTNERSHIP	Women	Neutral	None identified	None identified
	Men	Neutral	None identified	None identified
	Lesbians	Neutral	None identified	None identified
	Gay Men	Neutral	None identified	None identified
PREGNANCY & MATERNITY	Women	Neutral	None identified	None identified

RACE* Further information on the breakdown below each of these headings, is available here. For example Asian, includes Chinese, Pakistani and Indian etc	White	Neutral	None identified	None identified
	Mixed or multiple ethnic groups	Neutral	None identified	None identified
	Asian	Neutral	None identified	None identified
	African	Neutral	None identified	None identified
	Caribbean or Black	Neutral	None identified	None identified
		Neutral	None identified	None identified
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Neutral	None identified	None identified
SEX (GENDER)	Men	Neutral	None identified	None identified
	Women	Neutral	None identified	None identified
	Trans Men	Neutral	None identified	None identified
	Trans Women	Neutral	None identified	None identified
SEXUAL ORIENTATION	Heterosexual	Neutral	None identified	None identified
	Lesbian	Neutral	None identified	None identified
	Gay	Neutral	None identified	None identified
	Bisexual/Pansexual	Neutral	None identified	None identified
Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Negative	Possibly detrimental to licensed trade due to costs of replacement vehicles	Commitment to working with all stakeholders to ensure that the approach is achievable

Rurality i.e. access to services; transport; education; employment; broadband		Negative	If there is a reduction in licensed vehicles due to costs/infrastructure of EVCP's then this could reduce vehicle numbers making it more difficult to navigate the Borough and beyond	Commitment to working with all stakeholders to ensure that the approach is achievable
Other (e.g. caring responsibilities)		Neutral	None identified	None identified

* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available here

DRAFT

4. Outcomes, Action and Public Reporting

a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer
To liaise with other licensing authorities through the County Officer Group meetings to continue to keep up to date with any policy changes	Bi-monthly meetings	Michelle Bignell
Undertake a review of policy wording in 2028	31 December 2028	Michelle Bignell

b. Public reporting

All completed EqIA's are required to be publicly available on the Council's website once they have been signed off. EqIA's are also published with the papers for committee and full council decisions.

Please send completed EqIA's to [email address]

5. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

6. Change log

Name	Date	Version	Change

DRAFT

This page is intentionally left blank

Cheltenham Borough Council

Cabinet - 18 November 2025

Corporate Enforcement Policy

Accountable member:

Leader of the Council, Councillor Rowena Hay

Accountable officer:

Gareth Edmundson, Chief Executive

Ward(s) affected:

All indirectly

Key Decision: No

Executive summary:

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

The Council is required to have an effective 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:

1. **approves and adopts the Corporate Enforcement Policy attached to this report.**
2. **delegates 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, Lead Enforcement Officers and One Legal.**

---

1. Implications

1.1. Financial, Property and Asset implications

There are no direct financial implications arising from this report.

The adoption and approval of this Policy will support the Council's objectives in reducing crime and financial loss to the Council.

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.

Signed off by: Paul Jones, Deputy Chief Executive (S151 Officer), paul.Jones@cheltenham.gov.uk

1.2. Legal implications

The 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.

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.

The legislation utilised by the Council is identified within the Policy and the Council must comply with all legislative requirements.

Signed off by: One Legal, legalservices@onelegal.org

1.3. Environmental and climate change implications

None.

1.4. Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Looking after your money.

1.5. Equality, Diversity and Inclusion Implications

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.

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.

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.

---

2. Background

2.1. The Counter Fraud and Enforcement Unit is tasked with reviewing the Council's Corporate Enforcement Policy.

2.2. Regulatory authorities produce Enforcement Policies to inform the public and businesses about the principles which underpin their approach to enforcement.

2.3. 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.

2.4. 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.

2.5. Some service areas may produce separate Enforcement Plans and Policies setting out more detailed relevant service-specific procedures.

3. Reasons for recommendations

3.1. The Corporate Enforcement Policy attached at Appendix ii sets out the enforcement principles that the 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.

3.2. 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.

3.3. For ease of reference, new text is shown in red and text to be removed is shown as struck through.

3.4. 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'. This section now reflects the insourcing of the Councils housing and tenancy management and a new section being drafted to better cover the Licensing Service and the Council's activities in relation to anti-social behaviour.

3.5. Cabinet last considered the Policy in September 2019.

3.6. Awareness will be raised with all staff following the approval of the Policy.

4. Alternative options considered

4.1. None.

5. Consultation and feedback

5.1. The draft Policy was subject to consultation with Enforcement Officers, Leadership Team and One Legal.

5.2. Cabinet is asked to consider the Corporate Enforcement Policy and to approve and adopt the same.

6. Key risks

6.1. The Council is required to have an effective 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

sssabide by in investigations undertaken and to mitigate the risk of legal challenge in Court.

Report author:

Emma Cathcart, Head of Service Counter Fraud and Enforcement Unit,
Emma.Cathcart@cotswold.gov.uk

Appendices:

i. Risk Assessment
ii. Equality Impact Assessment
iii. Corporate Enforcement Policy

Background information:

N/A.

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1	The Council must fulfil its duties and responsibilities when considering and taking any enforcement action. The Policy helps to ensure a fair, proportionate and consistent approach to areas which are subject to legislation and regulation. Failure to have an appropriate Policy may result in inequitable enforcement and put the Council at risk of loss and damaged reputation.	Chief Executive	3	2	6	Reduce	Approve and promote policy and approach	Enforcement Staff	Ongoing

Appendix 2: Equality Impact Assessment (Screening)

1. Identify the policy, project, function or service change

a. Person responsible for this Equality Impact Assessment	
Officer responsible: Emma Cathcart	Service Area: Counter Fraud and Enforcement Unit
Title: Head of Service	Date of assessment: 1 October 2025
Signature: 	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
Is this new or existing?	**Already exists and is being reviewed**
Please specify reason for change or development of policy, function, strategy, service change or project	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	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.
Objectives:	Training to be delivered and awareness to be raised after adoption of the policy to ensure the appropriate application of enforcement activities.

Outcomes:	The Policy is applicable to enforcement staff across the Council and impacts members of the public.
Benefits:	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.

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Negative**
Please provide an explanation for your answer:	
Impact is both positive (deterrent and for public as a whole) and negative (subject of enforcement)	

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate	
Stage Two required	**Yes**
Owner of Stage Two assessment	**CFEU**
Completion date for Stage Two assessment	**1.10.2025**

STAGE 2 – Full Equality Impact Assessment

2. Engagement and consultation

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

a. Research and evidence
List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.
Legislation - various and wide ranging as the Policy covers a number of service areas within the Council. Guidance and Circulars – Simple Cautions The Code for Crown Prosecutors Enforcement Concordat

b. Consultation	
Has any consultation be conducted?	**Yes**
Describe the consultation or engagement you have conducted or are intending to conduct. Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option. If no consultation or engagement is planned, please explain why.	
Consultation with Legal Department Consultation with Service Managers / Enforcement Officers Consultation with Corporate Management	

3. Assessment

a. Assessment of impacts

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Positive	Enforcement action may not be appropriate in relation to older offenders	Applied on a case by case basis
	Younger People (16-25)	Positive	Enforcement action may not be appropriate in relation to younger offenders	Applied on a case by case basis
	Children (0-16)	Neutral		
DISABILITY A definition of disability under the Equality Act 2010 is	Physical disability	Positive	Enforcement action may not be appropriate in cases where the offender has a disability particularly where an offender lacks mental capacity.	Applied on a case by case basis
	Sensory Impairment (sight,	Positive		

available here. *See also carer responsibilities under other considerations.*	hearing)		Where necessary, individuals may request documentation or explanation that would assist them to understand/read information related to the enforcement activity being undertaken.	
	Mental health	Positive		
	Learning Disability	Positive		
GENDER REASSIGNMENT		Neutral		
MARRIAGE & CIVIL PARTNERSHIP	Women	Neutral		
	Men	Neutral		
	Lesbians	Neutral		
	Gay Men	Neutral		
PREGNANCY & MATERNITY	Women	Neutral		

RACE* Further information on the breakdown below each of these headings, is available here. For example Asian, includes Chinese, Pakistani and Indian etc	White	Neutral	Interpreters and translation of documents are provided where necessaary	
	Mixed or multiple ethnic groups	Neutral		
	Asian	Neutral		
	African	Neutral		
	Caribbean or Black	Neutral		
		Neutral		
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Neutral		
SEX (GENDER)	Men	Neutral		

	Women	Neutral		
	Trans Men	Neutral		
	Trans Women	Neutral		
SEXUAL ORIENTATION	Heterosexual	Neutral		
	Lesbian	Neutral		
	Gay	Neutral		
	Bisexual/Pansexual	Neutral		
Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Negative	Individuals experiencing disadvantage in this area are impacted more by enforcement activities	
Rurality i.e. access to services; transport; education;		Neutral		

employment; broadband				
Other (e.g. caring responsibilities)		Neutral		

* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available here

Corporate Enforcement Policy

Version Control:

Document Name:	Corporate Enforcement Policy
Version:	2
Responsible Officer:	Chief Executive Head of Service, Counter Fraud and Enforcement Unit
Approved by:	Cabinet September 2019
Next Review Date	November 2028

Revision History

Revision date	Version	Description
September 2019	1	Review of Corporate Enforcement Policy 2013
March 2025	2	Full review with inclusion of Anti-Social Behaviour section, Licensing section and general revisions

Consultees

Internal	External
Enforcement Lead Officers Governance Group One Legal Executive Leadership Team Cabinet Member	

Distribution

Name	
Enforcement Officers	

Contents

1. INTRODUCTION 3
2. PURPOSE OF THE POLICY 3
3 PRINCIPLES AND PROCEDURES FOR GOOD ENFORCEMENT 4
4 THE REGULATORS' COMPLIANCE CODE 4
5 CONFLICTS OF INTEREST AND UNDUE INFLUENCE 5
6 FAIRNESS AND EQUALITY 5
7 REFERRALS 5
8 ENFORCEMENT OPTIONS 7
9 ENFORCEMENT ACTION 6
10 PROSECUTION 7
11 SIMPLE CAUTIONS 9
12 POWERS OF OFFICERS 10
13 CIVIL CLAIMS 10
14 COMPLAINTS PROCEDURE 11
15 IMPLEMENTATION AND REVIEW 11
16 ENFORCEMENT TOOLS AND REMEDIES ..... **Error! Bookmark not defined.**
17 THE SCOPE OF EACH SERVICE 11
17.1 Planning - Development Control 11
17.2 Building Control 13
17.3 Housing 14
17.4 Environmental Health 14
17.5 Land and Property 15
17.6 Revenues and Benefits 16
17.7 Counter Fraud and Enforcement Unit 17
17.8 Parking Services 17
17.9 Liaison with other Agencies 18
17.10 Publicity 18

1. INTRODUCTION

1.2 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.

1.3 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.

1.4 Any reference within this Policy to staff, employees or Officers includes individuals employed and authorised to carry out duties on behalf of the Council. These Officers may be contractors, employees of organisations delivering services to the Council, or have joint employment arrangements with the Council.

1.5 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 and referral to regulatory committees 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, e~~E~~nforcement plays an important role in enabling the Council to achieve its priorities and community outcomes. ~~which are:~~

- ~~Making Cheltenham the cyber capital of the UK;~~
- ~~Continuing the revitalisation and improvement of our vibrant town centre and public spaces;~~
- ~~Achieving a cleaner and greener sustainable environment for residents, businesses and visitors;~~
- ~~Increasing the supply of housing and investing to build resilient communities;~~
- ~~Delivering services to meet the needs of our residents and communities.~~

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 that the Council:

- **Standards:** Provides and publishes clear standards setting out the level of service and performance provided.
- **Openness:** Provides information and advice in plain language about how we carry out our work, including consultation with stakeholders.
- **Helpfulness:** Provides advice and assistance on compliance in a courteous efficient and prompt manner.
- **Proportionality:** Is proportionate when making a decision on appropriate enforcement action and that Officers will, where discretion is allowed, consider both the circumstances of the case and history of the parties involved and ensuring that any 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 the relevant advice, Policy and the aims of the Council.
- **Consistency:** Carries out its duties in a fair, equitable and consistent manner with arrangements in place to promote consistency.
- **Transparency:** Provides appropriate access to information regarding regulatory procedures and decisions, having due regard to appropriate tests regarding freedom of information.
- **Accountability:** Is accountable for the efficiency and effectiveness of its regulatory activities.
- **Targeting:** Accepts that its enforcement resources are limited and, where appropriate, they will 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:** 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:** Allowing and encouraging economic progress and choosing proportionate approaches to those regulated based on relevant factors including, for example, business size and capacity.
- **Risk assessment:** Determining the priority risk in the area of responsibility and allocating resources where they would be most effective in addressing those priority risks.

- **Advice and guidance:** Providing authoritative and accessible advice to businesses.
- **Simple and straightforward ways to engage:** Explaining clearly what the non-compliant item or activity is, the advice being given, actions required or decisions taken and the reasons for these.
- **Transparency:** Publishing 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.

5.5 Registered Building Inspectors will be expected to abide by the Code of Conduct for Registered Building Inspectors.

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 a wide range of other agencies which includes:

- 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;
- 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 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 inappropriate. 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 section 16 of the Local Government (Miscellaneous Provisions) Act 1976, section 330 of the Town and Country Planning Act 1990 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 breaches of planning control the Council also has the power to issue a Planning Contravention Notice 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 223 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,
- 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,
- Withdrawal of a tenancy offer / loss of tenancy,
- Referral to Regulatory Committees.

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 Equalities 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, independently of Councillors, and 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;

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;
- 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.

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 Courts.

14.5 If a person is dissatisfied having exhausted the Council's complaints procedures, a complaint can be made to the Local Government and Social Care Ombudsman. If the matter relates to the Council's Housing Services, a person can complain to the Housing Ombudsman.

15 IMPLEMENTATION AND REVIEW

15.1 Implementation of the policy is the responsibility of all Enforcement Officers.

15.2 Departures from this policy should not occur without consideration of all the circumstances and where appropriate, 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

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. The team can also compel owners or occupiers of land to improve its condition where it adversely affects the amenity of the area.

16.1.2 The work of the Planning Enforcement Team is managed within the context of the Local Enforcement Plan (2024), this sets out how planning enforcement will be carried out, how planning permissions will be monitored, and how alleged breaches of planning control will be investigated. This can be viewed at Local enforcement plan | Planning enforcement | Cheltenham Borough Council

16.1.3 Generally, e~~E~~nforcement 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.

16.1.4 Some development, including d~~D~~omestic 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. ~~Any work commenced within the standard three year life of the permission, and built as approved are beyond further control. No action is possible~~ Enforcement notices cannot be issued in

respect of anticipated breaches, however the use of injunctions is possible where there is strong evidence that such breaches will occur and an injunction is necessary for example that unauthorised development would cause irreparable damage to protected assets or serious harm to the public. Otherwise, action for breaches ~~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.

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 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,
- 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,
- ~~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,~~
- ~~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.

16.1.9 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.

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 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.

16.3.2 Cheltenham Borough Council owns social housing properties in the borough. ~~that are managed by an arms-length housing provider or ALMO, Cheltenham Borough Homes.~~ The Council ~~Cheltenham Borough Homes~~ has responsibility for investigating breaches of tenancy and also for criminal investigation of areas of tenancy fraud such as illegal subletting, housing application fraud, and Right to Buy fraud. The investigation work is ~~carried out by Cheltenham Borough Homes~~ supported by the Counter Fraud and Enforcement Unit but any civil or criminal legal action is undertaken by Cheltenham Borough Council where they are the legal owner of the property. This action can include civil recovery of the property, debts or Unlawful Profit Orders, as well as criminal action to include prosecution and actions under the Prevention of Social Housing Fraud Act 2013 and the Proceeds of Crime Act 2002.

16.3.3 The Council has ~~retains~~ a key strategic and enabling housing role, and part of this work is carried out by the Council's Private Sector Housing Team. This is an enforcement team which works to make sure that private rented properties are safe and are well maintained and healthy places to live. The team provides 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.

16.4 **Environmental Health**

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; please refer to 17.3.3.
- 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 and animal welfare, 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 and pest control regulation.
- Waste, including fly-tipping and environmental crime.

16.4.2 The relevant Policies referred to in connection with enforcement issues for Environmental and Regulatory Services can be found on the Council's website at www.cheltenham.gov.uk. The responsibilities for decisions are also detailed therein.

16.4.3 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, graffiti and dog behaviour nuisance to personal ASB such as neighbour disputes, street drinking/ aggressive begging or substance misuse.

16.4.4 The Council Housing ASB team and SOLACE work together with communities to prevent, investigate and tackle 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

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

- Power to require information
- Fines and Fixed Penalty Notices
- Community Protection Notices and Community Protection Warnings.
- Injunctions and Criminal Behaviour Orders (in conjunction with the Police)
- Prosecution

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

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, obstruction of the public highway and other miscellaneous licensing and registrations.

16.5.2 The aim of the licensing compliance team is to protect consumers, residents and businesses in the Borough 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.
- **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

Benefit and still has the power to impose Civil Penalties (or fines) in relation to overpayments of Housing Benefit.

16.7.2 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 on the Council's website www.cheltenham.gov.uk

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

16.8 **Counter Fraud and Enforcement Unit**

16.8.1 The 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 Legislation / Regulations.
- Identity Card Act 2006.
- Fraud Act 2006.
- The Bribery Act 2010.
- Welfare Reform Act 2012.
- The Prevention of Social Housing Fraud Act 2013 and Housing Acts.
- 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 off-street parking for the Boroughs, Districts and County Council.~~ . Civil Enforcement Officers are employed to enforce against parking contraventions in Cheltenham Borough Council operated off-street car parks.

~~16.9.3~~

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 help deter anyone tempted to break the law.

Cheltenham Borough Council

Cabinet – 18 November 2025

Statement of Community Involvement 2025

Accountable member:

Cllr Mike Collins, Cabinet Member Planning and Building Control

Accountable officer:

Tracey Birkinshaw, Director of Planning & Building Control

Ward(s) affected:

All

Key Decision:

Yes

Executive summary:

The Statement of Community Involvement (SCI) sets out how the community can engage with the planning system. There is a statutory requirement to review SCIs every five years. The last SCI was published in 2023. Cheltenham Borough Council, Gloucester City Council and Tewksbury Borough Council are progressing the Strategic and Local Plan (SLP). Each of the three Councils has their own SCI. It is considered an opportune time to ensure that the three SCIs are aligned in the way that they reference the SLP, including any engagement and consultation. This report deals with Cheltenham Borough Council's SCI. Once adopted, when preparing Local Development Documents (other than the SCI), the authority must also comply with the SCI.

Recommendations: That Cabinet:

1. **is asked to adopt the revised Scheme of Community Involvement, attached to the report at Appendix 3 to take effect immediately; and**

2. **delegate authority to the Director of Planning and Building Control, in consultation with the Cabinet Member for Planning and Building Control, to prepare the Statement of Community Involvement for publication correcting any minor errors such as spelling, grammar, typographical and formatting changes that do not affect the substantive content of the Statement of Community Involvement.**

---

1. Implications

1.1 Financial, Property and Asset implications

None arising from this report.

Signed off by: Jon Whitlock, Head of Finance (Deputy S151 Officer, jon.whitlock@cheltenham.gov.uk)

1.2 Legal implications

The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 provide guidance on the preparation and adoption of a SCI.

Section 18 of the Planning and Compulsory Purchase Act 2004 (as amended) requires all local planning authorities to adopt a SCI. The SCI is a local development document, and the Council may at any time prepare a revision of all local development documents including the SCI. Under Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), local planning authorities must review Statements of Community Involvement at least once every five years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) do not require a revised SCI to go through an examination process and there is no requirement for local planning authorities to consult when reviewing and updating their Statement of Community Involvement.

Under Section 19(3) of the Planning and Compulsory Purchase Act 2004 (as amended), in preparing the Local Plan the authority must also comply with their SCI.

The revised SCI sets out how the Council will meet the statutory requirements for consulting on various types of planning documents and through the development management process.

When adopted, the SCI must be published on the Council's website. Once adopted the revised version of the SCI ensures that the Council's approach to community involvement with regards to planning is in accordance with national legislation and is therefore legally compliant.

Signed off by: Charlotte Lockwood, Locum Senior Lawyer, legalservices@onelegal.org.uk

1.3 Environmental and climate change implications

By accounting for local knowledge and facilitating community opinion into planning, this can accelerate behavioural change and adaptation measures. By ensuring communities can influence decision-making in local planning, this can provide a sense of ownership and therefore help to overcome barriers and unlock solutions (such as community owned renewable energy projects), shaping net zero resilient places, adequate planning for net zero energy infrastructure and access to the natural environment.

Signed off by: Maizy McCann, Climate Officer, Maizy.mcann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

Taking care of your money

1.5 Equality, Diversity and Inclusion Implications

The SCI in paragraphs 1.10 to 1.14 sets out that the Council recognises that many members of the community are hard to reach or engage with for a variety of reasons and the commitment that we will try to modify traditional consultation methods where appropriate to engage with such groups and individuals. The emerging Strategic and Local Plan (SLP) will be accompanied by Equalities and Health Impact Assessments.

1.6 Performance management – monitoring and review

The statutory requirement is to review the SCI within five years of its adoption.

2 Background

2.1 The SCI sets out how Cheltenham Borough Council will seek the involvement of the community in the planning of the area. All Local Planning Authorities (LPAs) are required by law to prepare a SCI and SCIs should be reviewed every 5 years. The SCI is a statement of how Cheltenham Borough Council will involve interested parties in matters relating to development in their area.

2.2 The previous SCI dates from 2023. The three Councils (Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council) are producing the Strategic and Local Plan (SLP). It is considered an opportune time to ensure that the three SCIs are aligned in the way that they reference the SLP, including any engagement and consultation. This report deals with Cheltenham Borough Council's SCI.

3 Reasons for recommendations

3.1 The Planning process has to comply with a variety of legal procedures in terms of public consultation and engagement. The SCI sets out how the Council will address these and how the public can expect to be engaged and kept informed. It also sets out local standards for consultation and engagement.

3.2 The SCI applies to planning policy including the production of the Development Plan, i.e. the SLP, as well as Supplementary Planning Documents (SPDs) which provide local guidance. The SCI also sets out how Cheltenham Borough Council will involve communities in relation to the development management process such as planning applications and related applications. Finally, the SCI sets out how Cheltenham Borough Council will support communities in undertaking neighbourhood planning.

3.3 Of relevance to the SCI is the recognition of the increased use of electronic communication as a way of notifying and consulting with communities. Amongst other aspects, the SCI sets out the benefits of consultation and principles for public involvement.

4 Alternative options considered

4.1 Because the SCI is a statutory requirement, there is no suitable alternative to its production.

5 Consultation and feedback

5.1 There is no statutory requirement for consultation.

6 Key risks

6.1 As set out in Appendix 1, the risk can be avoided through having an up-to-date

Statement of Community Involvement.

Report author:

John Spurling, Planning Policy Manager (Interim), john.spurling@cheltenham.gov.uk

Appendices:

i. Risk Assessment
ii. Equality Impact Assessment – Screening
iii. Statement of Community Involvement (SCI)

Background information:

N/A

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1	If the Council does not have an up-to-date Statement of Community Involvement, then it will not be performing part of its statutory duty	Director of Planning and Building Control	5	3	15	Avoid the risk	Close	This risk will be mitigated by the Cabinet decision.	18 November 2025

Appendix 2: Equality Impact Assessment (Screening)

1. Identify the policy, project, function or service change

a. Person responsible for this Equality Impact Assessment	
Officer responsible: John Spurling	Service Area: Planning
Title: Planning Policy Manager (Interim),	Date of assessment: 14 October 2025
Signature: John Spurling	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
Is this new or existing?	Already exists and is being reviewed
Please specify reason for change or development of policy, function, strategy, service change or project	
The three Councils (Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council) are producing the Strategic and Local Plan (SLP). It is considered an opportune time to ensure that the three SCIs are aligned in the way that they reference the SLP. This report deals with Cheltenham Borough Council's SCI.	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	To ensure that all interested members of the community get involved in the consultation process, whether that be responding to a planning application or commenting on a planning policy consultation.
Objectives:	As above

Outcomes:	As per aims
Benefits:	As per aims

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	Yes
Do you expect the impacts to be positive or negative?	No impact expected
Please provide an explanation for your answer:	
Cheltenham Borough Council already has an SCI from 2023. This revised SCI focuses on seeking to align the way that consultation and engagement on the SLP is referenced.	

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate	
Stage Two required	Choose an item.
Owner of Stage Two assessment	
Completion date for Stage Two assessment	

Please move on to Stage 2 if required (intranet link).

CHELTENHAM
BOROUGH COUNCIL

Statement of Community Involvement

Date of Publication: XX 2025

CONTENTS

1. INTRODUCTION 3

What is the Statement of Community Involvement? 3
Reviewing the SCI 3
Benefits of Consultation 4
Principles for Community Involvement 4
Involving the Community 5
Role of Councillors 7

2. LOCAL PLANS 9

Introduction to Local Plans 9
Consultation Requirements 9
Regulation 18 Stage 10
Regulation 19 Stage – Proposed Submission 10
Examination Stage 11

3. NEIGHBOURHOOD PLANS 12

Introduction to Neighbourhood Plans 12
Consultation Requirements 13

4. SUPPLEMENTARY PLANNING DOCUMENTS (SPDs) 15

Introduction to SPDs 15
Consultation Requirements 15
Regulation 12 - 13 Stage 15

5. PLANNING APPLICATIONS AND RELATED APPLICATIONS 16

Introduction to Planning Applications and related applications 16
Pre-application Discussions 16
The Planning Application 17
Determining the Application and Making the Decision 18
Notification of Decision 19
Appeals 19
Monitoring and Enforcement 19

1. INTRODUCTION

What is the Statement of Community Involvement?

1.1 The Statement of Community Involvement (SCI) sets out how Cheltenham Borough Council (CBC) will seek the involvement of the community in the planning of the area. All Local Planning Authorities (LPAs) are required by law[1] to prepare a SCI. This SCI is a statement of CBC's policy for involving interested parties in matters relating to development in their area. The SCI sets out how CBC will involve the local community, businesses and interest groups in the planning process~~.~~, in a manner consistent with relevant statutory requirements.

1.2 Paragraph 16 of the National Planning Policy Framework (NPPF) (2024) states, amongst other aspects, that *"Plans should… be shaped by early, proportionate and effective engagement between ~~planmakers~~plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees".* ~~Paragraph 126 of the NPPF refers to the need for *"effective engagement between applicants, communities, local planning authorities and other interests throughout the (planning and development) process".*~~

1.3 CBC's planning functions can be summarised broadly as follows:

i. Plan-Making and production of guidance;

ii. Assistance with Neighbourhood Plan-Making;

iii. Decision-Making, e.g. determining planning applications; and;

iv. Monitoring / Enforcement of planning permissions.

1.4 'Community' refers to all interested parties that live, work or do business in the area and includes residents, businesses, community and interest groups, neighbourhood planning forums, landowners, developers, adjoining local authorities, government agencies.

1.5 The planning system is plan-led, and any planning application must be determined in line with the Development Plan (Local and Neighbourhood Plans) unless material considerations[2] indicate otherwise.

Reviewing the SCI

~~1.6 Regulation requires that the SCI is reviewed every 5 years. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) reflect the reforms in the . The previous SCI dates from 2014. There have since been changes to planning legislation that have brought new requirements and processes for producing Plans and also for dealing with planning applications. Of relevance to the SCI is a simplified process for plan preparation and~~

[1] Section 18 of the Planning and Compulsory Purchase Act 2004 (as amended).

[2] The Planningportal gives an indication of what constitutes a material consideration, and it includes the NPPF, and material representations made by local residents and consultees on planning applications.

~~the recognition of the increased use of electronic communication as a way of notifying and consulting with communities.~~

1.6 Cheltenham Borough Council are working jointly with Gloucester City Council and Tewkesbury Borough Council to produce a Strategic and Local Plan (SLP) for their areas. The SCI has been reviewed and updated to ensure that it properly reflects the joint working and consultation arrangements that are proposed for the preparation of the SLP. The Government revised the National Planning Policy Framework in December 2024 and it is also necessary to ensure that this SCI incorporates relevant changes to national policy.

1.7 As well as setting out the consultation that will take place on the SLP, the SCI will also advise on the consultation that Cheltenham Borough Council will undertake on other planning policy documents such as Neighbourhood Plans (Section 3), Supplementary Planning Documents (Section 4) and planning applications (Section 5).

Benefits of Consultation

~~1.7~~1.8 Greater opportunities for community involvement can benefit communities by:

i. Providing a means for people to express their views, such as on the services that they want and that services are provided in the interests of the community;

ii. Providing an opportunity to influence the decision-making process and shape the future of the area;

iii. Complementing and supporting the strategic planning process and the delivery of infrastructure, development and services across the area;

iv. Providing a greater sense of ownership and accountability for CBC's decision-making;

v. Gaining a better understanding of community needs, improving community cohesion and fostering a sense of inclusion;

vi. Time and money efficiencies through quicker decision-making and speedier implementation of schemes and policies;

vii. Fostering a better understanding of the way that CBC services (particularly planning) work;

viii. Increasing input to problem solving and suggestions of new ideas; ~~and~~

ix. Improving participation in services~~.~~, and;

x. Social value.

Principles for Community Involvement

~~1.8~~1.9 ~~In order to meet the vision and enable future monitoring of~~ The SCI is based on the following

principles ~~have been set. CBC~~for Community Involvement. The Council will:

i. Ensure that the purpose of the consultation is clear;

ii. Ensure that consultation will be accessible to the community, through using plain English and highlighting that information can be provided in different formats or languages upon request and providing a point of contact;

iii. Ensure that the consultation undertaken meets the relevant statutory requirements;

~~iii.~~iv. Engage with communities, including hard to reach groups, at the earliest opportunity including using community networks and forums as well as wider online media channels;

~~iv.~~v. Ensure that consultation methods are appropriate;

~~v.~~vi. Ensure that consultation is meaningful;

~~vi.~~vii. Ensure processes are transparent, accountable and easy to understand; ~~and~~

~~vii.~~viii. Be proactive about consultation and use a range of appropriate methods where these will widen the opportunity to contribute~~.~~;

~~viii.~~ix. Notify engaged consultees in advance of key events and decisions in the consultation process~~.~~, and;

~~ix.~~X. Such notification will primarily be through low-cost means only such as web postings and email.

Involving the Community

~~1.9~~1.10 The SCI aims to ensure that all interested members of the community get involved in the consultation process, whether that be responding to a planning application or commenting on a planning policy consultation.

~~1.10~~1.11 In terms of plan-making and production of guidance, as well as assistance with Neighbourhood plan-making, the Council is required by law to consult certain organisations and bodies.

~~1.11~~1.12 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) sets out a list of specific and general consultation bodies, to be involved in the consultation process when preparing Local Plans and Supplementary Planning Documents (SPDs). Under the Regulations, CBC must consult with specific consultation bodies which they consider ~~may~~ have an interest in the subject, and the general consultation bodies which it considers are appropriate.

~~1.12~~1.13 General consultation bodies are bodies representing the interests of certain parts of the local community. These bodies fall into a number of groups, as follows:

i. Voluntary bodies;

ii. Racial, ethnic or national groups;

iii. Religious groups;

iv. Disabled persons groups~~;~~ and;

v. Business groups.

~~1.13~~1.14 As well as the 'specific' and 'general' consultation bodies[3], CBC will also consult "such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations"[4]. CBC recognise that many members of the community are hard to reach or engage with for a variety of reasons. ~~We~~ The Council will try to modify traditional consultation methods where appropriate to engage with such groups and individuals. The list is not exhaustive but includes:

i. People belonging to race, cultural and ethnic groups;

ii. People who are male or female;

iii. People who intend to plan or undergo or who are undergoing or have undergone gender reassignment;

iv. People of different ages, including children and older people;

v. People with disabilities and / or mental health conditions;

vi. People who have a religion or belief, or who do not;

vii. People who are gay, lesbian, bisexual, heterosexual;

viii. People who are married or in a Civil Partnership;

ix. People who are pregnant or subject to maternity agreements;

x. People who are living on low incomes~~;~~ and;

xi. People who are veterans.

~~1.14~~1.15 A database is maintained, which contains contact details of individuals, groups and other bodies that wish to be kept informed of consultations relating to planning policy documents. People can request that they are added to (or removed from) the consultation database.

~~1.15~~1.16 Cheltenham BC will make use of different methods of consulting, which may include

[3] These are the consultation bodies as defined through The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

[4] Regulation 18(2)(c) of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

those listed below.

Consultation Methods	Details
Webpages	Containing links to all consultation documents
Digital engagement methods	May include digital engagement platforms; Online polling / surveying; Webinars/online events; Digital collaboration tools; Map based and spatial tools
Emails or letters	Sent to contacts in database
Surveys and questionnaires	To be completed online or on paper
Public events	Designed for residents and other interested parties
Stakeholder workshops	To inform and to gain feedback from various stakeholders
Member briefing session	Elected members
Press releases	Information provided to media outlets
Social networking sites and online present	e.g. Facebook, Instagram, LinkedIn and X
Using existing networks	e.g. Local Nature Partnership

~~1.16~~1.17 The Town and Country Planning (Development Management Procedure) (England) Order (DMPO) 2015 (as amended) and The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) set out the statutory consultation bodies for different types of planning applications, the minimum consultation periods and the statutory consultation process for consulting on planning applications.

~~1.17~~1.18 For Neighbourhood Planning, The Neighbourhood Planning (General) Regulations 2012 (as amended) set out various requirements, including those relating to Neighbourhood Development Plans.

Role of Councillors

~~1.18~~ 1.19 Councillors play an important role in the preparation of and final decision-making on local planning policy, as well as in decision-making such as determining some planning applications. Councillors on the Planning Committee are under a specific duty to determine

applications ~~based on~~in accordance with the policies of the development plan, unless material considerations~~.~~

indicate otherwise.

2. LOCAL PLANS

Introduction to Local Plans

2.1 As set out in the glossary to the NPPF, Local Plans are "A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community~~. In law this is described as the development plan documents adopted~~, under the Town and Country Planning ~~and Compulsory Purchase Act 2004.~~(Local Planning) (England) Regulations 2012. A local plan can consist of either strategic or non-strategic policies, or a combination of the two". Cheltenham Borough Council are working jointly with Gloucester City Council and Tewkesbury Borough Council to prepare a Strategic and Local Plan (SLP) for the joint area.

2.2 ~~CBC~~The Council will maintain a Local Development Scheme (LDS) which, amongst other matters, will specify a timetable for the preparation of any Local Plan. The LDS's of Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council have been aligned to reflect the timetable for the SLP. CBC will also keep under review the matters which may be expected to affect the development of their area of the planning of its development. CBC may also keep under review matters in relation to any neighbouring area to the extent that those matters may be expected to affect the area of the authority.

2.3 CBC will consult beyond statutory consultees where appropriate and will aim for a town wide consultation by holding public consultation events at appropriate stages in the plan-making process.

Consultation Requirements

2.4 All consultations on Local Plans will comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) by achieving the following as a minimum:

i. ~~There will be at least two formal consultation periods, known as the '~~Consultation on Issues and options under Regulation ~~18' consultation stage(s) and 'Regulation 19'~~ 18;

~~i.~~ii. Consultation on the pre-submission ~~representation stage(s);~~version of the SLP under Regulation 19;

~~ii.~~iii. Each consultation will have published on the website a statement that sets out any consultation that has already taken place and how comments / representations to the consultation can be made. The statement is for information and is not itself being consulted upon~~.~~;

~~iii.~~iv. All formal consultation periods will be open to comments for a minimum of six weeks;

~~iv.~~v. Consultation documents will be made available at the Council office and public libraries through free access to a computer and the internet. Documents can also be provided in other formats and languages upon request;

~~v.~~vi. To enable assistive technologies and avoid digital exclusion, public comments will be accepted through the provided internet portal, in writing and by email~~;~~, and

~~vi.~~vii. CBC will also ensure that the relevant evidence base documents are accessible online.

Regulation 18 Stage

2.5 This stage is primarily intended to be an open discussion of the issues and options that relate to the topic. This stage provides an opportunity to influence the direction of the Plan at an early point in the plan making process. The discussions should reflect that freedom. A range of approaches can be appropriate at this stage, in order to be able to explore the issues in detail. There can be more than one phase of consultation at this stage.

2.6 The issues and options consultation (Spatial Options and Key Policy Areas), under Regulation 18, took place from 16th January until 13th March 2024. Information on that consultation can be found on the SLP website[5].

2.7 Following the initial consultation with residents and businesses that took place in 2024, the joint authorities are proposing further engagement on the SLP through workshops and targeted consultation events in 2025 and 2026. These will focus on evidence, strategy and policy options.

2.8 Responses received on social media (Twitter, Facebook and X, for example) will not be considered as formal representations in relation to consultations.

2.9 The policies of the SLP will also be informed by a variety of evidence studies. These will be on subjects such as housing and economic needs, landscape, Green Belt, transport and specialist housing needs, for example the needs of the Gypsy and Traveller community. Targeted consultation may take place during the development of these evidence documents (depending on the subject matter), and they will be made available on the SLP website once they have been completed.

Regulation 19 Stage – Proposed Submission

2.10 The Regulation 19 version of the local plan is sometimes referred to as the "pre-submission" version of the plan. This is the last stage at which there is an opportunity for people and organisations to make representations on the local plan. This version of the plan will be submitted for Examination in Public (EiP) alongside the representations that have been made to it and any modifications considered necessary. The EiP will be presided over by an independent planning inspector who will determine whether the SLP meets the tests of soundness and legal requirements, having regard to a variety of matters including national policy and the representations that have been made.

[5] » Consultations & Engagement

~~2.6~~2.11 Responses received on social media (X ~~and Facebook~~ for example) will not be considered as formal representations in relation to consultations. Consultation responses made at this stage will be made publicly available in full.

~~Regulation 19 Stage – Proposed Submission~~

~~2.7 This stage is important to ensure that everyone expresses their formal view on a 'Proposed Submission' draft of the Plan and then potentially to be heard at a Local Plan examination which will be presided over by an independent planning inspector.~~

~~2.8 Responses received on social media (twitter and Facebook for example) will not be considered as formal representations in relation to consultations. Consultation responses made at this stage will be made publicly available in full.~~

Examination Stage

~~2.9~~2.12 When ~~CBC submit~~ the ~~plan~~SLP is submitted to the Secretary of State[6] for examination, ~~CBC~~the authorities will submit a 'statement of consultation' that~~, amongst other aspects,~~ will summarise the main issues raised through representations. There may need to be further formal consultation carried out during the examination stage on potential modifications to the Plan. This is at the discretion of the planning inspector[7].

[6] The Secretary of State will appoint a planning inspector.

[7] The Planning Inspectorate produce a 'Procedure Guide for Local Plan Examinations', which is described as a "*Guide aimed at all those involved in the process and concerned with the procedural aspects of examining a local plan*"

3. NEIGHBOURHOOD PLANS

Introduction to Neighbourhood Plans

3.1 Neighbourhood Plans are produced by Qualifying Bodies (QB)[8], rather than CBC. The QB and CBC follow various requirements, including those within The Neighbourhood Planning (General) Regulations 2012 (as amended), to progress a Neighbourhood Plan. The QB follow various requirements to progress a Neighbourhood Plan and must carry out their own consultation before they submit it to CBC. CBC must then publicise the document and invite representations before sending it to independent examination.

3.2 The Neighbourhood Planning Act 2017 (as amended) sets out that the SCI is required to set out the Council's policies for giving advice or assistance to the QB in preparing a Neighbourhood Development Plan or Development Order. The table below sets out the support that Cheltenham Borough Council will provide in terms of neighbourhood planning.

Neighbourhood Planning Stage	**Responsibility**	**Cheltenham Borough Council Support**
Deciding to prepare a neighbourhood plan or development order	Parish Councils or Designated Neighbourhood Forum in non-parished areas (Qualifying Body	We will discuss your ideas for doing a neighbourhood plan to establish if a plan is suitable for your community. We will outline some initial aspects to help you consider whether to proceed. If you are in a non-parished area, we will tell you how to apply to be a Designated Neighbourhood Forum.
Designating the Neighbourhood Area	Qualifying Body	We will review the application and make the necessary arrangements to designate the neighbourhood area. Where necessary, the Council will undertake a consultation on the proposed area.
Preparing the Neighbourhood Development Plan	Qualifying Body	

[8] Section 38A (12) of the Planning and Compulsory Purchase Act 2004 (as amended) sets out that a *"'qualifying body' means a parish council, or an organisation or body designated as a neighbourhood forum, authorised for the purposes of a neighbourhood development plan to act in relation to a neighbourhood area…"*

Public consultation on a draft Neighbourhood Development Plan (Regulation 14)	Qualifying Body Responsible for the consultation arrangements on the draft plan and for bringing it to the attention of people who live, work or run a business in the designated neighbourhood area.	We will review the plan for environmental assessment requirements and other legislation including whether the NDP is likely to meet the legal requirements, i.e. the basic conditions, which include whether the NDP is in general conformity with the adopted Development Plan.
Submission of the draft neighbourhood plan to the local authority (Regulation 16)	Qualifying Body submits the plan. Cheltenham Borough Council responsible for next steps	We will make the arrangements to publicise (consult on) the plan for a minimum of 6 weeks and will, in conjunction with the Qualifying Body, appoint the independent examiner.
Examination of the Neighbourhood Plan	Cheltenham Borough Council / Examiner	We will make any necessary arrangements for the holding of the examination. On receipt of the examiner's report, we will work with the Qualifying Body to incorporate any recommended changes to the plan
Referendum	Cheltenham Borough Council	Responsible for arranging and holding the referendum
Neighbourhood Plan formally 'Made'	Cheltenham Borough Council	We will hold a Council meeting, providing more than 50% of those taking part in the referendum vote in favour of the plan being made part of the Development Plan, for the Neighbourhood Plan to be formally made provided none of the legislative exceptions apply. We will publish details of the plan and notify the Qualifying Body, and anyone known to have an interest in it

Consultation Requirements

3.3 With regard to applications made to the LPA relating to the Neighbourhood Plan, as long as the QB satisfies various requirements then CBC will publicise the plan proposal. CBC will comply with the following as a minimum:

i. There will be one formal consultation period, known as 'Regulation 16'[9];

ii. The consultation period will be open to comments for a minimum of six weeks;

iii. To enable assistive technologies and avoid digital exclusion, public comments will be accepted through the provided internet portal, in writing and by email; and

iv. Consultation documents will be made available at relevant Councils' offices and public libraries through free access to a computer and the internet.

3.4 Responses received on social media (~~twitter~~X and Facebook, for example) will not be considered as formal representations in relation to consultations.

[9] As per The Neighbourhood Planning (General) Regulations 2012 (as amended)

4. SUPPLEMENTARY PLANNING DOCUMENTS (SPDs)

Introduction to SPDs

4.1 Supplementary Planning Documents (SPDs) add further detail to the policies in the Development Plan. As set out in the glossary to the NPPF, *"They* (SPDs) *can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan".*

Consultation Requirements

4.2 All consultations on SPDs will comply with the following as a minimum.

i. There will be at least one formal consultation period, known as the 'Regulation 12'[10] stage;

ii. Each consultation will have published on the website a statement that sets out any consultation that has already taken place and how comments / representations to the consultation can be made. The statement is for information and is not itself being consulted upon;

iii. All formal consultation periods will be open to comments for a minimum of four weeks;

iv. To enable assistive technologies and avoid digital exclusion, public comments will be accepted through the provided internet portal, in writing and by email;

v. Consultation documents will be made available at CBC's office and public libraries through free access to a computer and the internet; and

vi. CBC will also ensure that all the relevant evidence base documents are accessible online.

Regulation 12 - 13 Stage

4.3 Regulation 12 is the only consultation stage for SPDs although there can be more than one phase at the discretion of CBC. This stage provides an opportunity to influence the direction of the SPD.

4.4 Responses received on social media (twitter and Facebook for example) will not be considered as formal representations in relation to consultations. Consultation responses will be made publicly available in full.

[10] The Town and Country Planning (Local Planning) (England) Regulations 2012

5. PLANNING APPLICATIONS AND RELATED APPLICATIONS

Introduction to Planning Applications and related applications

5.1 Development management is the "process whereby a local planning authority receives and considers the merits of a planning application and whether it should be given permission having regard to the development plan and all other material considerations"[11]. Whilst the focus for community engagement in planning is at the plan making stage, as part of the process to determine these applications, it is important that community have the opportunity to have their say. Whilst planning applications are the main type of applications, there are other types of applications including listed buildings and tree applications.

5.2 Planning applications usually consist of stages:

i. Pre-application discussions between the applicant and CBC. However, this is not a public matter;

ii. Pre-application public consultation by the applicant which, whilst not usually mandatory[12], is strongly encouraged by CBC;

iii. Submission of the planning application;

iv. Publicity and consultation by CBC on the planning application;

v. Determining the application and making the decision available; and

vi. Discharging planning conditions where relevant.

Pre-application Discussions

5.3 There is no requirement on CBC to consult during the pre-application stage. However, applicants for planning permission should consider consulting widely with the community at the earliest opportunity, particularly for major developments.

5.4 The NPPF, under the heading of 'Pre-application engagement and front-loading" sets out the advantages of early engagement. Paragraph 40 states *"Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications".*

5.5 CBC encourages all potential applicants to discuss their proposals with CBC and all other

[11] From the glossary on the Planningportal

[12] Exceptions include the installation for the harnessing of wind power for energy production subject to certain criteria

relevant statutory and non-statutory bodies before submitting their planning application. CBC have produced a 'Planning: Pre-Applications Services Guidance Note' (October 2022), which, amongst other aspects, sets out the benefits of seeking pre-application advice as well as the fee schedule.

The Planning Application

5.6 Once a planning application has been found to be valid, details of the application, including the application form, plans and accompanying documents are placed on CBC's website.

5.7 Notifications giving links to further information about planning applications are sent to consultees with a request for their comments. CBC will consult statutory consultees as required by the Town and Country Planning (Development Management Procedure) (England) Order (DMPO) 2015 (as amended) , Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), and where relevant the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and may consult other non-statutory consultees depending on the type, nature, scale and location of the proposed development.

5.8 CBC is required by law to bring all planning applications to the attention of the public. The Council must accord with the methods of publicity specified in the DMPO 2015 (as amended).

5.9 The DMPO 2015 (as amended) requires CBC to use one or more of the following methods of community engagement dependent on the type, nature and scale of the application:

i. Public Notice(s) erected at the site;

ii. Notification letter to the local Parish Council(s);

iii. Advertisement(s) in a local newspaper; and

iv. Notification letters to neighbours.

5.10 In addition, CBC will publish a 'weekly list' of planning applications and can be viewed on the ~~Councils~~Council's website via PublicAccess. Members of the public who have signed up via Public Access for application alerts will receive an email notification ~~for~~ when tracked applications are progressed. Councillors will be notified where planning applications involve the negotiation of a Section 106 agreement in their Ward.

5.11 Consultation on planning applications will only commence once the application has been validated in accordance with National Requirements[13]. A minimum period of 21 days for non-Environmental Impact Assessment (EIA) and a minimum of 30 days for EIA development will then be allowed for representations to be made. Certain types of applications will only

[13] Planning application forms and fees

require a minimum period of 14 days consultation, i.e. applications for permission in principle.

5.12 For planning applications (where appropriate), neighbour notification letters will be sent to the occupiers of properties immediately adjoining the site. Depending on the context of the site, the Case Officer will review whether any wider notification is appropriate. Notification will be sent to the relevant Parish Council clerk for the area where the development proposal is situated. Internal and external statutory consultees are also notified of relevant applications.

5.13 For certain applications (such as major applications; applications for listed building consent; applications for developments affecting the setting of a listed building or a conservation area), a site notice is displayed as close as possible to the proposed development site and a notice will be placed in the local press.

5.14 Representations must be submitted in writing either online via the Council's PublicAccess[14] website, letter or e-mail and will be recorded. The adopted Scheme of Delegation means that the majority of applications are determined under officer delegated powers. However, some complex or controversial applications may be decided at Planning Committee. Members of the public are advised that they may address the committee directly by registering to speak.

5.15 When someone chooses to make ~~a response to~~ comments on a planning application, CBC ask that they are made in timely manner and within the consultation period set. Any comments on planning applications should relate only to material considerations, which are matters that should be taken into account in deciding a planning application. Further information about material considerations can be found on the Government's PPG[15] and the Planning Portal[16]. All comments must contain the name and address of the author, and we cannot consider anonymous comments.

5.16 Any material changes to the submitted application may result in a re-notification or re-advertisement of the application. This will include notifying all those members of the public who sent in representations on the original proposals.

Determining the Application and Making the Decision

5.17 Applications are determined under officer delegated powers or by members at Planning Committee through the adopted ~~officer Schedule~~Scheme of Delegation. Information on the dates of Committees are available on CBC's website. Any representations from members of the public will be summarised in the Committee or Delegated Officer Report. Committee

[14] Planning applications - view and comment online

[15] The Government's Planning Practice Guidance (PPG) provides information on determining planning applications including what a material consideration could be

[16] The Planningportal gives an indication of what a material consideration could be

Reports and agendas are published on the Wednesday of the week before the Committee meeting and will be available on the Council's website[17].

Notification of Decision

5.18 Copies of the decision notice will be sent to the applicant/agent and the decision will be available to view on CBC's website. Members of the public ~~can also~~are not notified of the decision, but can view a copy of the decision notice and officers report ~~where relevant.~~on CBC's website.

Appeals

5.19 Where an applicant chooses to appeal against the decision, CBC will notify all those who made representations on the original application ~~and inform them when and where~~ on receipt of the appeal ~~is~~ to ~~be heard.~~provide an opportunity to make further representations if they so wish. There are three types of appeal; written representations, hearings and public inquiries. All appeals are dealt with by the Planning Inspectorate~~.~~ who will determine which route will be taken. Public inquiries are generally reserved for more complex applications where there is a lot of public interest There is no third party right to appeal a planning decision.

Monitoring and Enforcement

5.20 CBC is responsible for monitoring the planning permissions it has granted and for investigating any complaints about these developments. CBC is responsible for investigating alleged breaches of planning control and unauthorised development and will, if appropriate, take enforcement action ~~against any breaches of planning control.~~. Where negotiation fails to resolve a breach of planning control or where a retrospective application would be inappropriate or is refused, CBC will consider whether to take formal enforcement action. CBC can serve legal notices to stop breaches of planning control, require unauthorised breaches of planning control to cease and require the removal of structures or buildings that do not have planning permission. Further details can be found in CBC's Local Enforcement Plan (Planning)[18].

[17] Planning Committee meeting dates, agendas and minutes

[18] Local Enforcement Plan (Planning)

This page is intentionally left blank

Cheltenham Borough Council

Cabinet – 18 November 2025

Local Council Tax Support Scheme 2026/27

Accountable member:

Councillor Peter Jeffries, Cabinet Member Finance and Assets

Accountable officer:

Jayne Gilpin, Head of Revenues and Benefits

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

Each year the council is required to consider and approve its Local Council Tax Support Scheme for working age customers. Cabinet is being asked to adopt the proposed scheme and recommend that Council approves it as the Council's scheme for 2026/27.

RECOMMENDATIONS: That Cabinet:

1. **notes the outcome of the consultation on the Local Council Tax Support Scheme in Appendix 4.**

2. **approves the Local Council Tax Support Scheme for working age customers in Appendix 5 and summarised in Appendix 6 as the preferred option for 2026/27.**

3. **adopts the proposed scheme and to recommend that Council approves and adopts the proposed Local Council Tax Support Scheme for working age customers for 2026/27.**

4. **asks that Council gives authority to the Chief Executive, or Deputy Chief Executive, in consultation with the Cabinet Member Finance and Assets,**

to make any necessary adjustments to the income bands to reflect changes to and uprating of welfare benefits, by 27 February 2026.

---

1. Implications

1.1 Financial, Property and Asset implications

Since 2013/14 the Local Council Tax Support (LCTS) scheme operates in a similar way to other council tax discounts, such as for empty properties or single person occupiers. Rather than being accounted for as a benefit cash payment, the council tax base is reduced. Whilst this has no impact for the individual council taxpayer, a lower council tax base reduces the tax yield to this Council, Gloucestershire County Council, Gloucestershire Police Authority and parish councils. Any Government funding towards the scheme was rolled in to revenue support grant, which ceased for this council in 2018/19. We must therefore fund our share of the cost of the scheme.

The proposal to continue with the scheme in 2026/27 and confirm the income levels once all increases in welfare benefits and allowances are known will ensure that the same level of support is provided to our most vulnerable residents.

Signed off by: Jon Whitlock, Head of Finance jon.whitlock@cheltenham.gov.uk

1.2 Legal implications

The Local Council Tax Support Scheme “LCTS” is required under section 13A of the Local Government Finance Act 1992 (“the Act”). The Act states that for each financial year, billing authorities must consider whether to revise their LCTS scheme or replace it with another scheme.

The prescribed regulations set out the matters that must be included in such a scheme. Before making any changes, the local authority must, in the following order:-

1. consult with any major precepting authorities

2. publish the draft scheme

3. consult other parties likely to have an interest in the scheme

The prescribed regulations also set out the matters that must be included in such a scheme. The authority is required to publish the scheme in such manner as they think fit.

Signed off by: One Legal, legalservices@onelegal.org.uk

1.3 Environmental and climate change implications

There are no environmental and climate change implications associated with this report. The Climate Impact Assessment Tool has been completed to demonstrate the social benefits, this is attached as appendix 3.

Signed off by: Maizy McCann, Climate Officer maizy.mccann@cheltenham.gov.uk

1.4 ssss Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity.
Being a more modern, efficient and financially sustainable council

1.5 Equality, Diversity and Inclusion Implications

The Local Council Tax Support Scheme continues to provide 100% support to many low-income households. A minor change to the scheme conditions is being proposed. We monitor whether any groups are adversely affected by the scheme as part of the annual review and aim to mitigate them. An equality impact assessment in in Appendix 2

1.6 Performance management – monitoring and review

The proposed scheme if approved will be monitored closely by officers throughout the year and will be reviewed before developing the scheme for 2027/28.

---

2 Background

2.1 Prior to each financial year the Council is required to determine a Local Council Tax Support Scheme to help working age people on low incomes pay their council tax.

2.2 There is a separate national scheme for pension age customers which the Council cannot alter and is required to administer only.

2.3 The local council tax support scheme works in a similar way to other council tax discounts. The tax base is reduced due to the amount of support being awarded and therefore the income from council tax is reduced. The full cost is met by this council, Gloucestershire County Council, Gloucestershire Police Authority and the parish councils in proportion to the share of the council tax.

2.4 The local council tax support scheme for working age people from 2013/14 to 2018/19 in Cheltenham continued to mirror the previous council tax benefit

scheme whilst many Councils reduced support and no longer offered 100% reduction.

2.5 Since 2019/20 the council tax support scheme for working age customers has been based on five income bands with the highest band providing support at 100% of the council tax liability. Support then reduces to 80%, 60%, 40% and 20%, as household income increases.

2.6 The scheme ensures that 100% support continues to be available for the most vulnerable low-income residents.

3 Local Council Tax Support Scheme Caseload

3.1 As at October 2025 over £4.3 million was being awarded to 4,240 working age recipients. More than 50% of these are receiving the maximum 100% support, due to being on the lowest incomes.

3.2 There has been a slight decrease in the caseload so far this year this year but it has continued to be fairly stable.

4 Reasons for recommendations

4.1 The proposed scheme for 2026/27, as summarised in appendix 5, continues to be based on five income bands, with the highest band providing support at 100% of the council tax liability and reducing to the lowest band at 20%, as household income increases.

4.2 The income levels for each band are increased each year to keep in line with increases in welfare benefits. This ensures that we continue to provide the same level of support to low-income households.

4.3 The Government has announced that the standard Universal Credit element will rise above the rate of inflation in 2026-27 while some of the health-related elements will be frozen, or for new claimants, reduce. Other welfare benefits are expected to rise in line with inflation. The exact increases have not yet been confirmed. Other changes may also be announced by the Government in the Autumn Budget which could an impact on the income bands within the scheme, such as a full or partial removal of the two-child benefit cap.

4.4 Authority will therefore be sought from Council for the Chief Executive, or Deputy Chief Executive, in consultation with the Cabinet Member Finance and Assets, to make any necessary adjustments to the income bands and apply the appropriate increase, once all relevant changes have been confirmed.

4.5 This will ensure that the most vulnerable, low-income households continue to

receive the highest level of support.

4.6 A further change is being proposed in 2026/27 to increase the income disregard for each disabled child from £100 per week to £200. This increase will ensure that the scheme continues to fully disregard the additional benefits received in respect of disabled children. Based on current data this could benefit around 150 households. This has been included in the draft scheme conditions in appendix 4 and the scheme summary in appendix 5.

4.7 No other changes are being proposed to the scheme conditions for 2026/27.

4.8 A discretionary hardship relief scheme is in place which can support customers with exceptional circumstances and/or financial hardship.

5 Alternative options considered

5.1 None. The Council is required to approve a Local Council Tax Support Scheme for working age people.

6 Consultation and feedback

6.1 A consultation exercise was undertaken between 28th August 2025 and 8th October 2025 seeking views on whether the Council should continue to ensure that the most vulnerable residents receive 100% support and if the disabled child disregard should be increased.

6.2 The consultation attracted 57 responses. Of the 57 respondents, 40 (70%) either agreed or had a neutral opinion on whether 100% support should continue and 17 (30%) disagreed. 42 respondents (74%), either agreed or had a neutral opinion on whether the Disabled Child Income Disregard should be increased to £200 while 15 (26%) either disagreed or proposed a different amount.

6.3 Further details of the consultation results are in Appendix 3

7 Key risks

7.1 The risks are in appendix 1

Report author:

Jayne Gilpin, Head of Revenues and Benefits jayne.gilpin@cheltenham.gov.uk

Appendices:

i. Risk Assessment
ii. Equality Impact Assessment – Screening –(to be included in all Cabinet and Council reports)
iii. Climate Change Assessment
iv. Consultation analysis and responses
v. Summary of draft scheme
vi. Draft scheme conditions for 2026/27

Background information:

1. The Local Government Finance Act 1992, amended by the Local Government Finance Act 2012 http://www.legislation.gov.uk/ukpga/2012/17/contents
2. The Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012 http://www.legislation.gov.uk/uksi/2012/2885/contents/made
3. The Council Tax Reduction Schemes (Amendment) (England) Regulations 2017 http

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If the caseload increases significantly the cost to the council, in the form reduced council tax income, will increase	Jayne Gilpin	2	3	6	Accept	Monthly monitoring and an annual review of the scheme	Jayne Gilpin	Ongoing
	If the income bands are not modified in line with welfare benefits support for vulnerable households could reduce. This would cause reputational damage to the Council	Jayne Gilpin	1	1	2	Avoid	Uprate in line with increase in welfare benefits once known	Jayne Gilpin	01/02/20

Appendix 2: Equality Impact Assessment (Screening)

1. Identify the policy, project, function or service change

a. Person responsible for this Equality Impact Assessment	
Officer responsible: Jayne Gilpin	Service Area: Revenues and Benefits
Title: Head of Revenues and Benefits	Date of assessment: 24/10/2025
Signature: Jayne Gilpin	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
Local Council Tax Support Scheme 2026/27	
Is this new or existing?	**Already exists and is being reviewed**
Please specify reason for change or development of policy, function, strategy, service change or project	
There is a legal requirement to review and approve a scheme prior to each financial year	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	To set the council tax support scheme for working age people for 2026/27. The scheme reduces council tax bills for households on low income and sets out the eligibility rules and procedures.
Objectives:	To approve the scheme or 2026/27 and uprate income bands within the scheme in line with welfare benefits to ensure support continues at the same level. Increasing the disabled child disregard will ensure the scheme continues to fully disregard the additional benefits received in respect of disabled children.

Outcomes:	Working age households eligible for support will continue receive a reduction on their council tax bill in 2026/27
Benefits:	Eligible working age households on low income will receive reduction to their council tax bills. Support is currently provided to around 4,250 working age households at a cost of just over £4.3 million.

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Positive**

Please provide an explanation for your answer:

The scheme is being reviewed and needs to be approved by Council prior to each financial year. Each year Income bands are uprated in line with welfare benefits so that recipients continue to receive the same level of support. In 2026/27 an increase in the disabled child disregard is being proposed. The increase will ensure the scheme continues to fully disregard the additional benefits received in respect of disabled children. This will impact this customers affected in a positive way.

The scheme is a means tested benefit so if a recipient has an increase in income above the annual increase to the income bands then they will see a reduction in benefit.

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

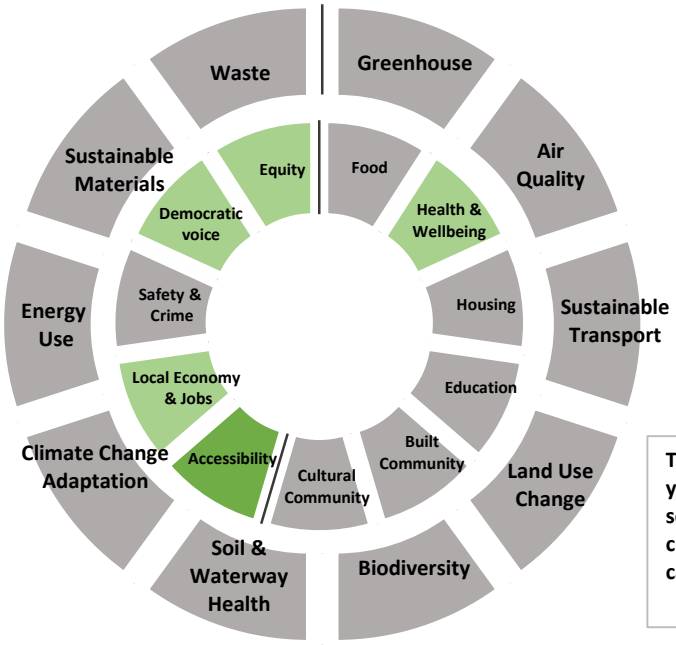
f. Identify next steps as appropriate

Stage Two required	**Yes**
Owner of Stage Two assessment	**Jayne Gilpin**

Completion date for Stage Two assessment	**24/10/2025**

Please move on to Stage 2 if required (intranet link).

Council Tax Support scheme 2026/27



Key

Significant and/or long-term positive impact identified. No changes needed.
Slight or short-term positive impact identified. No changes needed but could be reviewed to improve.
Not applicable or no cause for concern.
Slight or short-term negative impact identified. Review to identify possible improvements.
Significant and/or long-term negative impact identified. Changes needed before proceeding.

This summary of the CIAT should be used to aid your decision making. Please note that red/amber segments simply mean that mitigations and changes should take place not that the project cannot go ahead.

Environmental	Scores	Justification	Recommendation
GHGs	0	There is no connection between this and council tax support	0
Air quality	0	There is no connection between this and council tax support	0
Sustainable Transport	0	There is no connection between this and council tax support	0
Land use change	0	There is no connection bewteen this and council tax suport	0
Biodiversity	0	There is no connection between this and council tax support	0
Soil and waterway health	0	There is no connection between this and	0
Climate Change Adaptation	0	There is no connection between this and council tax support	0
Energy Use	0	There is no connection between this and council tax support	0
Sustainable Materials	0	There is no connection between this and council tax support	0
Waste	0	There is no connection between this and council tax support	0

Social	Scores	Justification	Recommendation
Food	0	Not applicable	0

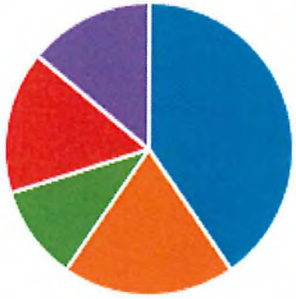
Health	2	Support with council tax allows residents to continue to live in higher quality housing by reducing barriers to finance	0
Housing	0	Not applicable	0
Education	0	Not applicable	0
Community	0	Not applicable	0
Culture	0	Not applicable	0
Accessibility	4	The Council Tax Support provides a vital financial lifeline to the most vulnerable residents in the town. The CTS impacts positively on their finances as it will reduce their monthly outgoings if they qualify for support.	0
Local Economy and Jobs	2	Council tax support provides vital help for working age customers and may assist them to become financially stable and be able to become economically active	0
Safety	0	Not applicable	0
Equity	1	Eligibility is based on financial circumstances	0
Democratic Voice	1	Residents have been given the opportunity to consult on the scheme for 2026-27	0

Council tax support scheme 2026-27 consultation

57 Responses 03:36 Average time to complete Closed Status

1. Under the current scheme a person can receive 100 percent council tax support and does not have to make any contribution towards their council tax payments. Do you think that people should continue to receive 100 percent help towards their council tax?

Strongly agree	23
Agree	11
Neutral	6
Disagree	9
Strongly disagree	8



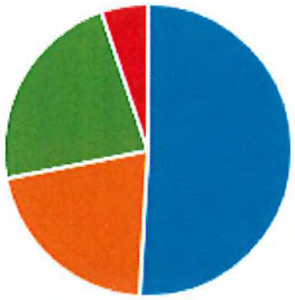
2. If you disagree with a person receiving 100 percent what do you think the maximum amount of help should be?

95 percent	11
90 percent	4
80 percent	7
75 percent	2
Less than 75 percent	11



3. At present, the scheme conditions allow an extra £100 per week of income to be ignored in the calculation of council tax support, where a person has a disabled child living in the household. Should this disregard be increased to £200 per week?

Yes	29
No	12
Neutral	13
Other amount	3



4. If you answered "other amount" to question 3, please state below how much you think the disregard should be per week

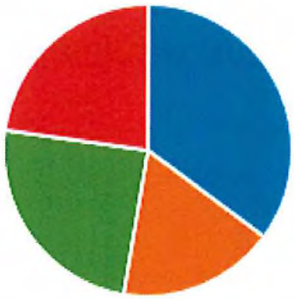
4
Responses

Latest Responses

1	anonymous	Same as universal credit £411
2	anonymous	300
3	anonymous	200
4	anonymous	£200

5. How do you think the council should continue to fund its council tax support scheme from April 2026?

By reducing the level of counc...	20
By increasing the amount of c...	10
Reduce funding for council se...	14
Other	13



6. If you answered "other" to Q4 and would like to provide your own suggestions please use the box below.

11
Responses

Latest Responses

"Reduce funding for council services by first identifying effi...

1	anonymous	Support should be in the form of a loan and limited to the duration of a risk assured plan placed on the recipient to improve their circumstances so as repay the loan and not to need support in future
2	anonymous	There are many ways this council has wasted money in Cheltenham I'd be more than happy to discuss further on 07771594414
3	anonymous	From the profits made through the Council's investments.
4	anonymous	Using money from the increased National Insurance contributions.
5	anonymous	Help the more vulnerable residents and lower the cost of council tax
6	anonymous	Pay there way in life
7	anonymous	Central government to cover e.g through DWP financing it
8	anonymous	No thanks
9	anonymous	Perhaps by forming community events where the profits from them go towards council tax it might eliminate the need for people's bills to increase while leaving those who require support still able to receive it. I am unsure how much funding this would bring in or how you would go about this. However, I feel it would be an interesting and creative way to positively impact the community. Whilst still supporting everyone who cannot by tax by using the profits made off of selling things at these events. Just an attempt at a creative suggestion to help both sides of tax payers.
10	anonymous	i don't know unfortunately
11	anonymous	Reduce funding for council services by first identifying efficiency savings, reducing administrative costs, improving tax collection rates, and seeking alternative revenue sources (such as partnerships or grants) before considering cuts to essential services or increases in council tax.

7. Are you a resident of the Cheltenham Borough area?

Yes	55
No	2



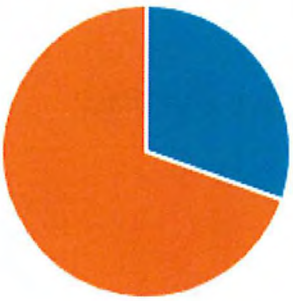
8. Are you registered for council tax purposes?

Yes	53
No	4



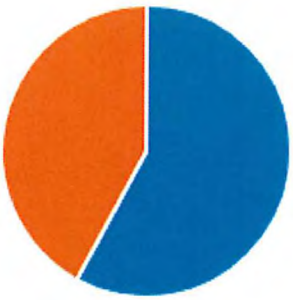
9. Do you currently receive council tax support?

Yes	17
No	39



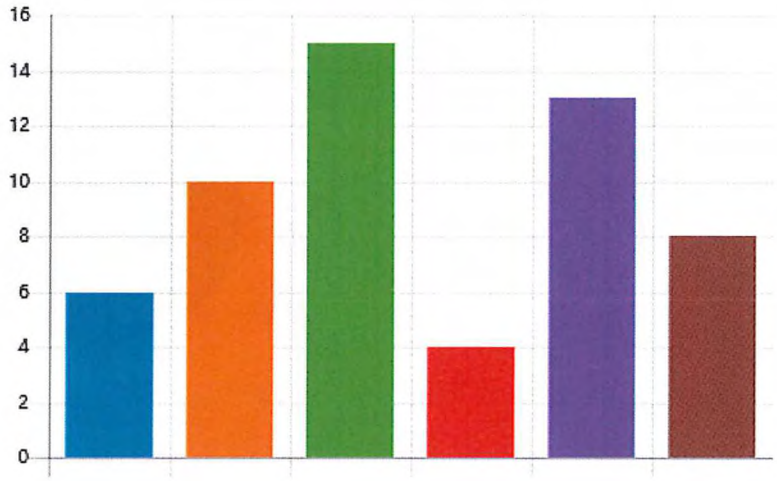
10. Are you currently in employment?

Yes	33
No	24



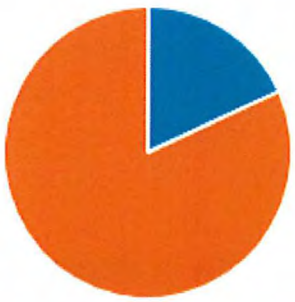
11. What is your age group?

18-24	6
25-34	10
35-44	15
45-54	4
55-64	13
65 years and over	8



12. Do you have a disability?

Yes	10
No	45



Microsoft 365

Microsoft Forms | AI-Powered surveys, quizzes and polls Create my own form

Privacy and cookies (https://go.microsoft.com/fwlink/?LinkId=521839) | Terms of use (https://go.microsoft.com/fwlink/?linkid=866263)

This page is intentionally left blank

Cheltenham Borough Council

Local council tax support scheme for working age customers

S13A and Schedule 1A of the Local Government Finance Act 1992

2026/27

Details of support to be given for working age customers during the financial year 2026/27

Section 1 (Council tax support scheme)

1. Introduction to the council tax support banded income scheme

Sections 2-8 (Definitions and interpretation)

2. Interpretation – an explanation of the terms used within this scheme

3. Definition of non-dependant

4. Requirement to provide a National Insurance number

5. Persons who have attained the qualifying age for state pension credit or who are of working age and who have a partner who has attained the qualifying age for state pension credit

6. Remunerative work

7. Persons subject to immigration control – excluded from claiming under this scheme

8. Temporary absence (period of absence)

Section 9-11 (The family for council tax support purposes)

9. Membership of a family

10. Circumstances in which a person is to be treated as responsible (or not responsible) for a child or young person

11. Circumstances in which a child or young person is to be treated as being or not being a member of the household

Section 12-29 & Schedules 1 & 2 (Definition and treatment of income for council tax support)

12. Calculation of income and capital of members of applicant's family and of a polygamous marriage

13. Circumstances in which the capital and income of a non-dependant is to be treated as applicant's

14. Calculation of income on a weekly basis

15. Treatment of child care charges

16. Average weekly earnings of employed earners

17. Average weekly earnings of self-employed earners

18. Average weekly income other than earnings

19. Calculation of average weekly income from tax credits

20. Calculation of weekly income

21. Disregard of changes in tax, contributions, etc.

22. Earnings of employed earners

23. Calculation of net earnings of employed earners

24. Earnings of self-employed earners

25. Calculation of net profit of self-employed earners

26. Deduction of tax and contributions of self-employed earners

27. Calculation of income other than earnings

28. Capital treated as income

29. Notional income

Sections 30-39 & Schedule 4 (Definition and the treatment of capital for council tax support)

30. Capital limit

31. Calculation of capital

32. Disregard of capital of child and young person

33. Income treated as capital

34. Calculation of capital in the United Kingdom

35. Calculation of capital outside the United Kingdom

36. Notional capital

37. Diminishing notional capital rule

38. Capital jointly held

39. Calculation of tariff income from capital

Section 40-53 (Definition and the treatment of students for council tax support)

40. Student related definitions

41. Treatment of students

42. Students who are excluded from entitlement to council tax support

43. Calculation of grant income

44. Calculation of covenant income where a contribution is assessed

45. Covenant income where no grant income or no contribution is assessed

46. Student Covenant Income and Grant Income – non disregard

47. Other amounts to be disregarded

48. Treatment of student loans

49. Treatment of fee loans and treatment of payments from access funds

50. Disregard of contribution

51. Further disregard of student's income

52. Income treated as capital

53. Disregard of changes occurring during summer vacation

Sections 54-65 (The calculation and amount of council tax support)

54. Maximum council tax support

55. Non-dependant deductions

56. Extended support

57. Duration of extended support period

58. Amount of extended support

59. Extended support – movers

60. Relationship between extended support and entitlement to council tax support under the general conditions of entitlement

61. Extended support (qualifying contributory benefits)

62. Duration of extended support period (qualifying contributory benefits)

63. Amount of extended support (qualifying contributory benefits)

64. Extended support (qualifying contributory benefits) – movers

65. Relationship between extended support (qualifying contributory benefits) and entitlement to council tax support under the general conditions of entitlement

Sections 66-67 (Dates on which entitlement and changes of circumstances are to take effect)

66. Date on which entitlement is to begin.

67. Date on which change of circumstances is to take effect.

Sections 68-75 (Claiming and the treatment of claims for council tax support)

68. Making an application

69. Procedure by which a person may apply for a reduction under the authority's scheme

70. Date on which an application is made

71. Submission of evidence electronically

72. Use of telephone provided evidence

73. Information and evidence

74. Amendment and withdrawal of application

75. Duty to notify changes of circumstances

Sections 76-83 (Decisions, decision notices and awards of council tax support)

76. Decisions by the authority

77. Notification of decision

78. Time and manner of granting council tax support

79. Persons to whom support is to be paid

80. Shortfall in support

81. Payment on the death of the person entitled

82. Offsetting

83. Payment where there is joint and several liability

Sections 84-87 (Collection, holding and forwarding of information for council tax support)

84. Use of information from and to the Department for Work and Pensions (DWP) and Her Majesty's Revenue and Customs (HMRC)

85. Collection of information

86. Recording and holding information

87. Forwarding of information

Sections 88-91 (Revisions, written statements, termination of council tax support)

88. Persons affected by decisions

89. Revisions of decisions

90. Written statements

91. Terminations

Section 92 (Appeals against the authority's decisions)

92. Procedure by which a person may make an appeal against certain decisions of the authority

Section 93 (Procedure for applying for a discretionary reduction)

93. Procedure for an application to the authority for a reduction under section 13A(1)(c) of the 1992 Act

Section 94-100 (Electronic Communication)

94. Interpretation.

95. Conditions for the use of electronic communication

96. Use of intermediaries

97. Effect of delivering information by means of electronic communication

98. Proof of identity of sender or recipient of information

99. Proof of delivery of information

100. Proof of content of information

Section 101 (Counter Fraud and Compliance)

101. Counter fraud and compliance

Schedule 1

Sums to be disregarded in the calculation of earnings

Schedule 2

Sums to be disregarded in the calculation of income other than earnings

Schedule 3

Disabled child additional disregard

Schedule 4

Capital to be disregarded

Council tax support scheme

Section 1

Details of support to be given to working age customers for the financial year 2026/27

1.0 **Introduction to the council tax support scheme**

1.1 The following scheme has been adopted by the Council on xx December 2025 in respect of the period 1 April 2026 – 31 March 2027.

1.2 This document details how the scheme will operate for working age customers and, in accordance with Section 13A of the Local Government Finance Act 1992, specifies who will be entitled to a reduction under the scheme, Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012 and the Local Government Finance Act 1992 (as amended) and is effective from 1 April 2019 for a period of one financial year.

1.3 The scheme in respect of pension age applicants is defined by Central Government within the Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012 and the Local Government Finance Act 1992 (as amended).

The Council has **no** discretion in relation to the calculation of council tax support in respect of the pension age scheme other than the full disregard of war pension and war disablement pension and it is designed to provide broadly the same level of support provided within the previous (Council Tax Benefit) scheme.

1.4 Full details of the working age scheme of the authority are contained within this document from section 2 onwards. The authority is required to specify a scheme for working age and therefore this scheme only applies to a person who;

a. has not attained the qualifying age for state pension credit; or
b. has attained the qualifying age for state pension credit and he/she or their partner, is a person on income support, on an income-based job seekers allowance, or on an income-related employment and support allowance.

1.5 The scheme shall not apply to any applicant who is subject to immigration control under Section 115 of the Immigration and Asylum Act 1999 and non-economically active EEA nationals.

1.6 To obtain support the individual (or partner) must:

a. have not attained the qualifying age for state pension credit;
b. be liable to pay council tax in respect of a dwelling in which he is solely or mainly resident;
c. is not deemed to be absent from the dwelling;
d. not fall within a class of person prescribed for the purposes of paragraph 2(9) of Schedule 1A to the Local Government Finance Act 1992 and excluded from the authority's scheme;
e. be somebody in respect of whom a maximum council tax reduction amount can be calculated;
f. not have capital above £6,000;
g. be a person in respect of whom a day in which s/he is liable to pay council tax falls within a week in respect of which the person's income falls into one of the income bands or the applicant or partner is in receipt of Income Support, Jobseekers Allowance (income based) or Employment and Support Allowance (income related); and
h. have made a valid application for support.

1.7 Applicants entitled to a maximum reduction under this scheme fall into the income band 1 percentage reduction less any non-dependant deductions. Applicants who fall into income band 1 are:

a. applicants whose calculated weekly income, in accordance with this scheme, is within the income range for income band 1; or
b. an applicant is in receipt of either;
(i) Income Support
(ii) Job Seeker's Allowance (Income Based)
(iii) Employment and Support Allowance (Income Related)

1.8 Any award of council tax support will be applied to the annual liability after any discounts and non-dependant deductions have been applied. The annual liability will be restricted to a council tax band E if the applicant lives in a property that has either a council tax band F, G or H. The reduction applied will be equal to a percentage of the liability. The percentage of support will be based on the income of the applicant and partner(s) according to the specified income bands.

1.9 The income bands are numbered 1 to 5 and apply to the income range and related percentage reduction. The income range is the combined income of the applicant and their partner(s). Where the combined weekly income falls on or within a range, then the related council tax support percentage is applied against the net annual liability calculated in 1.8 above. The income bands are:

Income bands to be updated after DWP notify new allowances from April 2026

Income Band	Single person	Couple	Lone parent with children	Couple with children	Maximum percentage entitlement
	Income £				
Band 1	0.00 to 110.00	0.00 to 168.00	0.00 to 220.00	0.00 to 280.00	100%
Band 2	110.01 to 150.00	168.01 to 220.00	220.01 to 270.00	280.01 to 340.00	80%
Band 3	150.01 to 180.00	220.01 to 275.00	270.01 to 320.00	340.01 to 400.00	60%
Band 4	180.01 to 210.00	275.01 to 335.00	320.01 to 370.00	400.01 to 460.00	40%
Band 5	210.01 to 240.00	335.01 to 400.00	370.01 to 430.00	460.01 to 530.00	20%

1.10 These income bands will apply unless the Government makes fundamental changes to welfare benefits, including Universal Credit, in the year 2026-27. If a high inflationary increase is applied to welfare benefits, the values above may need to be uprated to ensure that those applicants who the Council aims to provide 100% support to, still receive this full support during 2026-27.

1.11 If the Government announce increases to welfare benefits in year, after the council tax support scheme has been approved, the Council reserves the right to be able to disregard these increases in income to ensure that applicants continue to receive the intended level of support.

Sections 2-8

Definitions and interpretation

2.0 **Interpretation – an explanation of the terms used within this scheme**

2.1 In this scheme-
'the Act' means the Social Security Contributions and Benefits Act 1992;
'the Administration Act' means the Social Security Administration Act 1992;
'the 1973 Act' means of Employment and Training Act 1992;
'the 1992 Act' means the Local Government Finance Act 1992;
'the 2000 Act' means the Electronic Communications Act 2000;

'Abbeyfield Home' means an establishment run by the Abbeyfield Society including all bodies corporate or incorporate which are affiliated to that Society;

'adoption leave' means a period of absence from work on ordinary or additional adoption leave by virtue of section 75A or 75B of the Employment Rights Act 1996;

'an AFIP' means an armed forces independence payment payable in accordance with an armed and reserve forces compensation scheme established under section 1(2) of the Armed Forces (Pensions and Compensation) Act 2004;

'applicant' means a person who the authority designates as able to claim council tax support – for the purposes of this scheme all references are in the masculine gender but apply equally to male and female;

'application' means an application for a reduction under this scheme;

'appropriate DWP office' means an office of the Department for Work and Pensions dealing with state pension credit or office which is normally open to the public for the receipt of claims for income support, a job seeker's allowance or an employment and support allowance;

'assessment period' means such period as is prescribed in sections 19 to 21 over which income falls to be calculated;

'attendance allowance' means-
(a) an attendance allowance under Part 3 of the Act;
(b) an increase of disablement pension under section 104 or 105 of the Act;
(c) a payment under regulations made in exercise of the power conferred by paragraph 7(2)(b) of Part 2 of Schedule 8 to the Act;
(d) an increase of an allowance which is payable in respect of constant attendance under paragraph 4 of Part 1 of Schedule 8 to the Act;
(e) a payment by virtue of article 14, 15, 16, 43 or 44 of the Personal Injuries (Civilians) Scheme 1983 or any analogous payment; or
(f) any payment based on need for attendance which is paid as part of a war disablement pension;

'the authority' means a billing authority in relation to whose area this scheme has effect by virtue of paragraph 4(6) of Schedule 1A to the 1992 Act;

'basic rate', where it relates to the rate of tax, has the same meaning as in the Income Tax Act 2007 (see section 989 of that Act);

'the Caxton Foundation' means the ch that name established on 28 March 2011 out of funds provided by the Secretary of State for the benefit of certain persons suffering from hepatitis C and other persons eligible for payment in accordance with its provisions;

'child' means a person under the age of 16;

'child benefit' has the meaning given by section 141 of SCCBA;

'the Children Order' means the Children (Northern Ireland) Order 1995;

'child tax credit' means a child tax credit under section 8 of the Tax Credits Act 2002;

'claim' means a claim for council tax support;

'close relative' means a parent, parent-in-law, son, son-in-law, daughter, daughter-in-law, step-parent, step-son, step-daughter, brother, sister, or if any of the preceding persons is one member of a couple, the other member of that couple;

'concessionary payment' means a payment made under arrangements made by the Secretary of State with the consent of the Treasury which is charged either to the National Insurance Fund or to a Departmental Expenditure Vote to which payments of benefit or tax credits under the benefit Acts or the Tax Credits Act are charged;

'contributory employment and support allowance' means an allowance under Part 1 of the Welfare Reform Act 2007(d) as amended by the provisions of schedule 3, and part 1pf the schedule14, to the welfare reform Act 2012 9e) that remove references to an income-related allowance and a contributory allowance under part 1 of the welfare Reform act 2007 as that part has effect apart from the provisions"
'converted employment and support allowance' means an employment and support allowance which is not income-related and to which a person is entitled as a result of a conversion decision within the meaning of the Employment and Support Allowance (Existing Awards) Regulations 2008;

'council tax support scheme' has the same meaning as **'council tax reduction or reduction'**

'council tax support ' means council tax reduction as defined by S13a Local Government Finance Act 1992 (as amended);

'couple' means;
(a) a man and a woman who are married to each other and are members of the same household;
(b) a man and a woman who are not married to each other but are living together as husband and wife;
(c) two people of the same sex who are civil partners of each other and are members of the same household; or
(d) two people of the same sex who are not civil partners of each other but are living together as if they were civil partners;

Two people of the same sex are to be treated as living together as if they were civil partners if, and only if, they would be treated as living together as husband and wife were they of opposite sexes;

'date of claim' means the date on which the application or claim is made, or treated as made, for the purposes of this scheme

'designated authority' means any of the following;
the local authority; or a person providing services to, or authorised to exercise any function of, any such authority;

'designated office' means the office designated by the authority for the receipt of claims for council tax support;

(a) by notice upon or with a form appr purposes of claiming council tax support; or
(b) by reference upon or with such a form to some other document available from it and sent by electronic means or otherwise on application; or
(c) by any combination of the provisions set out in sub-paragraphs (a) and (b) above;

'disability living allowance' means a disability living allowance under section 71 of the Act;

'dwelling' has the same meaning in section 3 or 72 of the 1992 Act;

'earnings' has the meaning prescribed in section 25 or, as the case may be, 27;

'the Eileen Trust' means the charitable trust of that name established on 29 March 1993 out of funds provided by the Secretary of State for the benefit of persons eligible for payment in accordance with its provisions;

'electronic communication' has the same meaning as in section 15(1) of the Electronic Communications Act 2000;

'employed earner' is to be construed in accordance with section 2(1)(a) of the Act and also includes a person who is in receipt of a payment which is payable under any enactment having effect in Northern Ireland and which corresponds to statutory sick pay or maternity pay;

'Employment and Support Allowance Regulations' means the Employment and Support Allowance Regulations 2008;

'Employment and Support Allowance (Existing Awards) Regulations' means the Employment and Support Allowance (Transitional Provisions, Housing Benefit and Council Tax Benefit) Existing Awards) Regulations 2010;

'the Employment, Skills and Enterprise Scheme' means a scheme under section 17A (schemes for assisting persons to obtain employment; 'work for your benefit' schemes, etc) of the Jobseekers Act 1995 known by that name and provided pursuant to arrangements made by the Secretary of State that is designed to assist applicants to obtain employment, including self-employment, and which may include for any individual work-related activity (including work experience or job search);

'employment zone' means an area within Great Britain designated for the purposes of section 60 of the Welfare Reform and Pensions Act 1999 and an **'employment zone programme'** means a programme established for such an area or areas designed to assist applicants for a job seeker's allowance to obtain sustainable employment;

'employment zone contractor' means a person who is undertaking the provision of facilities in respect of an employment zone programme on behalf of the Secretary of State for Work and Pensions;

'enactment' includes an enactment comprised in, or in an instrument made under, an Act of the Scottish Parliament;

'extended support' means a payment of council tax support payable pursuant to section 60;

'extended support period' means the period for which an extended support is payable in accordance with section 60A or 61A of this scheme;
'extended support (qualifying contributory benefits)' means a payment of council tax support payable pursuant to section 61;

'family' has the meaning assigned to it by section 137(1) of the Act and Section 9 of this scheme;

'a guaranteed income payment' means a payment made under article 15(1)(c) (injury benefits) or (29)(1)(a) (death benefits) of the Armed Forces and Reserve Forces (Compensation Scheme) Order 2011;

'he, him, his' also refers to the feminine within this scheme

'housing benefit' means housing benefit under Part 7 of the Act; 'the Housing Benefit Regulations' means the Housing Benefit Regulations 2006;

'Immigration and Asylum Act' means the Immigration and Asylum Act 1999;

'**income band'** is the number allocated to the income range and related percentage;

'an income-based jobseeker's allowance' and **'a joint-claim jobseeker's allowance'** have the meanings given by section 1(4) of the Jobseekers Act 1995;

'income-related employment and support allowance' means an income-related allowance under Part 1 of the Welfare Reform Act 2007;

'Income Support Regulations' means the Income Support (General) Regulations 1987(a);

'the Independent Living Fund (2006)' means the Trust of that name established by a deed dated 10 April 2006 and made between the Secretary of State for Work and Pensions of the one part and Margaret Rosemary Cooper, Michael Beresford Boyall and Marie Theresa Martin of the other part;

'invalid carriage or other vehicle' means a vehicle propelled by a petrol engine or by electric power supplied for use on the road and to be controlled by the occupant;

'Jobseekers Act' means the Jobseekers Act 1995; 'Jobseeker's Allowance Regulations' means Jobseeker's Allowance Regulations 1996;

'limited capability for work' has the meaning given in section 1(4) of the Welfare Reform Act;

'limited capability for work-related activity' has the meaning given in 2(5) of the Welfare Reform Act 2007;

'the London Bombing Relief Charitable Fund' means the company limited by guarantee (number 5505072), and registered charity of that name established on 11 July 2005 for the purpose of (amongst other things) relieving sickness, disability or financial need of victims (including families or dependants of victims) of the terrorist attacks carried out in London on 7 July 2005;

'lone parent' means a person who has no partner and who is responsible for a member of the same household as a child or young person;

'the Macfarlane (Special Payments) Trust' means the trust of that name, established on 29 January 1990 partly out of funds provided by the Secretary of State, for the benefit of certain persons suffering from haemophilia;

'the Macfarlane (Special Payments) (No2) Trust' means the trust of that name, established on 3 May 1991 partly out of funds provided by the Secretary of State, for the benefit of certain persons suffering from haemophilia and other beneficiaries;

'the Macfarlane Trust' means the charitable trust, established partly out of funds provided by the Secretary of State to the Haemophilia Society, for the relief of poverty or distress among those suffering from haemophilia;

'main phase employment and support allowance' means an employment and support allowance where the calculation of the amount payable in respect of the applicant includes a component under section 2(1)(b) or 4(2)(b) of the Welfare Reform Act 2007 except in Part 1 of Schedule 1;

'**the Mandatory Work Activity Scheme'** means a scheme within section 17A (schemes for assisting persons to obtain employment; 'work for your benefit' schemes, etc) of the Jobseekers Act 1995 known by that name and provided pursuant to arrangements made by the Secretary of State that is designed to provide work or work related activity for up to 30 hours per week over a period of four consecutive weeks with a view to assisting applicants to improve their prospect of obtaining employment;

'maternity leave' means a period during which a woman is absent from work because she is pregnant or has given birth to a child, and at the end of which she has a right to return to work either under the terms of her contract of employment or under Part 8 of the Employment Rights Act 1996;

'member of a couple' means a member of a married or unmarried couple;

'MFET Limited' means the company limited by guarantee (number 7121661) of that name, established for the purpose in particular of making payments in accordance with arrangements made with the Secretary of State to persons who have acquired HIV as a result of treatment by the NHS with blood or blood products;

'mobility supplement' means a supplement to which paragraph 9 of Schedule 4 refers;

'net earnings' means such earnings as are calculated in accordance with section 26;

'net profit' means such profit as is calculated in accordance with section 28;

'new dwelling' means, for the purposes of the definition of 'second authority' and sections 60C, and 61C the dwelling to which a applicant has moved, or is about to move, in which the applicant is or will be resident;

'non-dependant' has the meaning prescribed in section 3;

'non-dependant deduction' means a deduction that is to be made under section 55;

'occasional assistance' means any payment or provision made by a local authority, the Welsh Ministers or the Scottish Ministers for the purposes of;

(a) meeting, or helping to meet an immediate short-term need;
    (i) arising out of an exceptional event or exceptional circumstances, or
    (ii) that needs to be met to avoid a risk to the well-being of an individual, and
(b) enabling qualifying individuals to establish or maintain a settled home, and-
    (i) 'local authority' has the meaning given by section 270(1) of the Local Government Act 1972; and
    (ii) 'qualifying individuals' means individuals who have been, or without the assistance might otherwise be:
    (aa) in prison, hospital, an establishment providing residential care or other institution, or;
    (bb) homeless or otherwise living an unsettled way of life; and 'local authority' means a local authority in England within the meaning of the Local Government Act 1972;

'occupational pension' means any pension or other periodical payment under an occupational pension scheme but does not include any discretionary payment out of a fund established for relieving hardship in particular cases;

'occupational pension scheme' has the same meaning as in section 1 of the Pension Schemes Act 1993

'partner' in relation to a person, means

(a) where that person is a member of a couple, the other member of that couple;
(b) subject to paragraph (c), where that person is polygamously married to two or more members of his household, any such member to whom he is married; or

(c) where that person is polygamous has an award of Universal Credit with the other party to the earliest marriage that still subsists, that other party to the earliest marriage;

'paternity leave' means a period of absence from work on leave by virtue of section 80A or 80B of the Employment Rights Act 1996;

'payment' includes part of a payment;

'pensionable age' has the meaning given by the rules in paragraph 1 of Schedule 4 to the Pensions Act 1995;

'pension fund holder' means with respect to a personal pension scheme or an occupational pension scheme, the trustees, managers or scheme administrators, as the case may be, of the scheme concerned;

'pensioner' a person who has attained the age at which pension credit can be claimed;

'person affected' shall be construed as a person to whom the authority decides is affected by any decision made by the council;

'personal independence payment' has the meaning given by Part 4 of the Welfare Reform Act 2012;

'person treated as not being in Great Britain' has the meaning given by section 7;

'personal pension scheme' means-

a. a personal pension scheme as defined by section 1 of the Pension Schemes Act 1993;
b. an annuity contractor trust scheme approved under section 20 or 21 of the Income and Corporation Taxes Act 1988 or a substituted contract within the meaning of section 622(3) or that Act which is treated as having become a registered pension scheme by virtue of paragraph 1(1)(f) of Schedule 36 of the Finance Act 2004;
c. a personal pension scheme approved under Chapter 4 of Part 14 of the Income and Corporation Taxes Act 1988 which is treated as having become a registered pension scheme by virtue of paragraph 1(1)(g) of Schedule 36 to the Finance Act 2004;

'policy of life insurance' means any instrument by which the payment of money is assured on death (except death by accident only) or the happening of any contingency dependent on human life, or any instrument evidencing a contract which is subject to payment of premiums for a term dependent on human life;

'polygamous marriage' means a marriage to which section 133(1) of the Act refers namely;

(a) a person is a husband or wife by virtue of a marriage entered into under a law which permits polygamy; and
(b) either a party to the marriage has for the time being any spouse additional to the party.

'public authority' includes any person certain of whose functions are functions of a public nature;

'qualifying contributory benefit' means'

(a) severe disablement allowance;
(b) incapacity benefit;
(c) contributory employment and support allowance;

'qualifying course' means a qualifying course as defined for the purposes of Parts 2 and 4 of the Job Seeker's Allowance Regulations 1996;

'qualifying income-related benefit' means

(a) income support;
(b) income-based job seeker's allowance;
(c) income-related employment and support allowance;

'qualifying person' means a person in respect of whom payment has been made from the Fund, the Eileen Trust, MFET Limited, the Skipton Fund, the Caxton Foundation or the London Bombings Relief Charitable Fund;

'reduction week' means a period of seven consecutive days beginning with a Monday and ending with a Sunday;

'relative' means a close relative, grandparent, grandchild, uncle, aunt, nephew or niece;

'relevant authority' means an authority administering council tax reduction;

'relevant week' In relation to any particular day, means the week within which the day in question falls;

'remunerative work' has the meaning prescribed in section 6;

'rent' means 'eligible rent' to which regulation 12 of the Housing Benefit Regulations refers less any deductions in respect of non-dependants which fall to be made under regulation 74 (non-dependant deductions) of those Regulations;

'self-employed earner' is to be construed in accordance with section 2(1)(b) of the Act;

'self-employment route' means assistance in pursuing self-employed earner's employment whilst participating in-

(a) an employment zone programme;
(b) a programme provided or other arrangements made pursuant to section 2 of the 1973 Act (functions of the Secretary of State) or section 2 of the Enterprise and New Towns (Scotland) Act 1990 (functions in relation to training for employment, etc); or
(c) the Employment, Skills and Enterprise Scheme;

'**Service user**' means an applicant participating as a service user are to –

(a) a person who is being consulted by or on behalf of-
    (1) a body which has a statutory duty to provide services in the field of health, social care or social housing; or
    (2) a body which conducts research or undertakes monitoring for the purpose of planning or improving such services

in their capacity as a user, potential user, carer of a user or person otherwise affected by the provision of those services; or

(b) the carer of a person consulted as described in sub-paragraph (a) where the carer is not being consulted as described in that sub-paragraph"

'the Skipton Fund' means the ex-gratia payment scheme administered by the Skipton Fund Limited, incorporated on 25 march 2004, for the benefit of certain persons suffering from hepatitis C and other persons eligible for payment in accordance with the scheme's provisions.

'State Pension Credit Act' means the State Pension Credit Act 2002;

'student' has the meaning prescribed in section 43;

'subsistence allowance' means an allowance which an employment zone contractor has agreed to pay to a person who is participating in an employment zone programme;

'support or reduction week' means a period of 7 consecutive days commencing upon a Monday and ending on a Sunday;

'tax year' means a period beginning with 6 April in one year and ending with 5 April in the next;

'training allowance' means an allowance (whether by way of periodical grants or otherwise) payable-

(a) out of public funds by a Government department or by or on behalf of the Secretary of State, Skills Development Scotland, Scottish Enterprise or Highlands and Islands Enterprise, the Young People's Learning Agency for England, the Chief Executive of Skills Funding or Welsh Ministers;

(b) to a person for his maintenance or in respect of a member of his family; and

(c) for the period, or part of the period, during which he is following a course of training or instruction provided by, or in pursuance of arrangements made with, the department or approved by the department in relation to him or so provided or approved by or on behalf of the Secretary of State, Skills Development Scotland Scottish Enterprise or Highlands and Islands Enterprise or the Welsh Ministers.

It does not include an allowance paid by any Government department to or in respect of a person by reason of the fact that he is following a course of full-time education, other than under arrangements made under section 2 of the 1973 Act or is training as a teacher;

'the Trusts' means the Macfarlane Trust, the Macfarlane (Special Payments) Trust and the Macfarlane (Special Payments) (No 2) Trust;

'Universal Credit' means any payment of Universal Credit payable under the Welfare Reform Act 2012;

'war disablement pension' means any retired pay or pension or allowance payable in respect of disablement under an instrument specified in section 639(2) of the Income Tax (Earnings and Pensions) Act 2003;

'war pension' means a war disablement pension, a war widow's pension or a war widower's pension;

war widow's pension' means any pension or allowance payable to a woman as a widow under an instrument specified in section 639(2) of the Income Tax (Earnings and Pensions) Act 2003 in respect of the death or disablement of any person;

war widower's pension' means any pension or allowance payable to a man as a widower or to a surviving civil partner under an instrument specified in section 639(2) of the Income Tax (Earnings and Pensions) Act 2003 in respect of the death or disablement of any person;

'**week'** means a period of seven days beginning with a Monday;

'Working Tax Credit Regulations' means the Working Tax Credit (Entitlement and Maximum Rate) Regulations 2002; and

'young person' has the meaning prescribed in section 9(1) and in section 142 of the SSCBA.

2.2 In this scheme, references to an applicant occupying a dwelling or premises as his home shall be construed in accordance with regulation 7 of the Housing Benefit Regulations 2006.

2.3 In this scheme, where an amount is to be rounded to the nearest penny, a fraction of a penny shall be disregarded if it is less than half a penny and shall otherwise be treated as a whole penny.

2.4 For the purpose of this scheme, a person is on an income-based jobseeker's allowance on any day in respect of which an income-based jobseeker's allowance is payable to him and on any day;

(a) in respect of which he satisfies the conditions for entitlement to an income-based jobseeker's allowance but where the allowance is not paid in accordance with regulation 27A of the

Jobseeker's Allowance Regulation or 20A or regulations made under section 17A of the Jobseekers Act (circumstances in which a jobseeker's allowance is not payable); or

(b) which is a waiting day for the purposes of paragraph 4 of Schedule 1 to that Act and which falls immediately before a day in respect of which an income-based jobseeker's allowance is payable to him or would be payable to him but for regulation 27A of the Jobseeker's Allowance Regulations or section 19 or 20A or regulations made under section 17A of that Act;

(c) in respect of which he is a member of a joint-claim couple for the purposes of the Jobseekers Act and no joint-claim jobseeker's allowance is payable in respect of that couple as a consequence of either member of that couple being subject to sanctions for the purposes of section 20A of that Act;

(d) in respect of which an income-based jobseeker's allowance or a joint-claim jobseeker's allowance would be payable but for a restriction imposed pursuant to section 6B, 7, 8 or 9 of the Social Security Fraud Act 2001 (loss of benefit provisions).

2.5 For the purposes of this scheme, a person is on an income-related employment and support allowance on any day in respect of which an income-related employment and support allowance is payable to him and on any day;

(a) in respect of which he satisfies the conditions for entitlement to an income-related employment and support allowance but where the allowance is not paid in accordance with section 18 of the Welfare Reform Act disqualification; or

(b) which is a waiting day for the purposes of paragraph 2 of Schedule 2 to that Act and which falls immediately before a day in respect of which an income-related employment and support allowance is payable to him or would be payable to him but for section 18 of that Act.

2.6 For the purposes of this scheme, two persons shall be taken to be estranged only if their estrangement constitutes a breakdown of the relationship between them.

2.7 In this scheme, references to any person in receipt of state pension credit includes a person who would be in receipt of state pension credit but for regulation 13 of the State Pension Credit Regulations 2002 (small amounts of state pension credit).

3.0 Definition of non-dependant

3.1 In this scheme, 'non dependant' means any person, except someone to whom section 3.2 applies, who normally resides with an applicant or with whom an applicant normally resides.

3.2 This paragraph applies to;

a. any member of the applicant's family;
b. if the applicant is polygamously married, any partner of his and any child or young person who is a member of his household and for whom he or one of his partners is responsible;
c. a child or young person who is living with the applicant but who is not a member of his household by virtue of section 11(membership of the same household);
d. subject to section 3.3, any person who, with the applicant, is jointly and severally liable to pay council tax in respect of a dwelling for any day under sections 6, 7 or 75 of the 1992 Act (persons liable to pay council tax);
e. subject to section 3.3, any person who is liable to make payments on a commercial basis to the applicant or the applicant's partner in respect of the occupation of the dwelling;
f. a person who lives with the applicant in order to care for him or a partner of his and who is engaged by a charitable or voluntary organisation which makes a charge to the applicant or his partner for the services provided by that person.

3.3 Excepting persons to whom section 3.2 a) to c) and f) refer, a person to whom any of the following sub-paragraphs applies shall be a non-dependant-

a. a person who resides with the person to whom he is liable to make payments in respect of the dwelling and either;

i. that person is a close relative, partner, or
ii. the tenancy or other agreement between them is other than on a commercial basis;

b. a person whose liability to make payments in respect of the dwelling appears to the authority to have been created to take advantage of the council tax support scheme except someone who was, for any period within the eight weeks prior to the creation of the agreement giving rise to the liability to make such payments, otherwise liable to make payments of rent in respect of the same dwelling;

c. a person who becomes jointly and severally liable with the applicant for council tax in respect of a dwelling who was, at any time during the period of eight weeks prior to his becoming so liable, a non-dependant of one or more of the other residents in that dwelling who are so liable for the tax, unless the authority is satisfied that the change giving rise to the new liability was not made to take advantage of the support scheme.

4.0 Requirement to provide a National Insurance number

4.1 No person shall be entitled to support unless the criteria below in 4.2 is satisfied in relation both to the person making the claim and to any other person in respect of whom he is claiming support.

4.2 This subsection is satisfied in relation to a person if-

a. the claim for support is accompanied by;
   i a statement of the person's national insurance number and information or evidence establishing that that number has been allocated to the person; or
   ii information or evidence enabling the national insurance number that has been allocated to the person to be ascertained; or

b. the person makes an application for a national insurance number to be allocated to him which is accompanied by information or evidence enabling such a number to be so allocated and the application for reduction is accompanied by evidence of the application and information to enable it to be allocated.

4.3 Section 4.2 shall not apply-

a. in the case of a child or young person in respect of whom council tax support is claimed;
b. to a person who;

   i. is a person in respect of whom a claim for council tax support is made;
   ii. is subject to immigration control within the meaning of section 115(9)(a) of the Immigration and Asylum Act; and
   a. has not previously been allocated a national insurance number.

5.0 Persons who have attained the qualifying age for state pension credit or who are of working age and who have a partner who has attained the qualifying age for state pension credit

5.1 This scheme for working age applicants still applies to a person in relation to any person if he, or if he has a partner, his partner, has attained the qualifying age for state pension credit.

5.2 This scheme applies to a person if;

(i) he has not attained the qualifying age for state pension credit; or
(ii) he has attained the qualifying age for state pension credit and he, or if he has a partner, his partner, is;
   (a) a person on income support, on income-based jobseeker's allowance or income based employment and support allowance; or
   (b) a person with an award of Universal Credit.

6.0 Remunerative work

6.1 Subject to the following provisions of this section, a person shall be treated for the purposes of this scheme as engaged in remunerative work if he is engaged, or, where his hours of work fluctuate,

he is engaged on average, for not less t week, in work for which payment is made or which is done in expectation of payment.

6.2 Subject to section 6.3, in determining the number of hours for which a person is engaged in work where his hours of work fluctuate, regard shall be had to the average of hours worked over;

a. if there is a recognisable cycle of work, the period of one complete cycle (including, where the cycle involves periods in which the person does no work, those periods but disregarding any other absences);
b. in any other case, the period of 5 weeks immediately prior to that date of claim, or such other length of time as may, in the particular case, enable the person's weekly average hours of work to be determined more accurately.

6.3 Where, for the purposes of section 6.2 a), a person's recognisable cycle of work at a school, other educational establishment or other place of employment is one year and includes periods of school holidays or similar vacations during which he does not work, those periods and any other periods not forming part of such holidays or vacations during which he is not required to work shall be disregarded in establishing the average hours for which he is engaged in work.

6.4 Where no recognisable cycle has been established in respect of a person's work, regard shall be had to the number of hours or, where those hours will fluctuate, the average of the hours, which he is expected to work in a week.

6.5 A person shall be treated as engaged in remunerative work during any period for which he is absent from work referred to in section 6.1 if the absence is either without good cause or by reason of a recognised customary or other holiday.

6.6 A person on income support, an income-based job seeker's allowance or an income-related employment and support allowance for more than 3 days in any reduction week shall be treated as not being in remunerative work in that week.

6.7 A person shall not be treated as engaged in remunerative work on any day on which the person is on maternity leave, paternity leave or adoption leave, or is absent from work because he is ill.

6.8 A person shall not be treated as engaged in remunerative work on any day on which he is engaged in an activity in respect of which;
a. a sports award has been made, or is to be made, to him; and
b. no other payment is made or is expected to be made to him.

7.0 Persons subject to Immigration Control – excluded from claiming under this scheme persons treated as not being in Great Britain

7.1 The class of person described in this paragraph consists of any person treated as not being in Great Britain.

7.2 Except where a person falls within sub-paragraph (5) or (6), a person is to be treated as not being in Great Britain if the person is not habitually resident in the United Kingdom, the Channel Islands, the Isle of Man or the Republic of Ireland.

7.3 A person must not be treated as habitually resident in the United Kingdom, the Channel Islands, the Isle of Man or the Republic of Ireland unless the person has a right to reside in one of those places.

7.4 For the purposes of sub-paragraph (3), a right to reside does not include a right which exists by virtue of, or in accordance with;

(a) regulation 13 of the EEA Regulations or Article 6 of Council Directive No 2004/38/EC;

(aa) regulation14 of the EEA regulatioa case where the right exists under that regulation because the person is –

1. a jobseeker for the purpose of the definition of "qualified person" in reg 6(1) of those regulations or
2. a family member(within the meaning of reg 7 of those regulations of such a jobseeker;

(ab) Article 45 of the Treaty on the functioning of the European Union(a)(in a case where the person is seeking work in the united Kingdom, the channel islands, The Isle of man or republic of Ireland;

(b) regulation 15A(1) of the EEA Regulations, but only in a case where the right exists under that regulation because the applicant satisfies the criteria in paragraph (4A) of that regulation or Article 20 of the Treaty on the Functioning of the European Union (in a case where the right to reside arises because a British citizen would otherwise be deprived of the genuine employment of their rights as a European Union citizen).

7.5 A person falls within this sub-paragraph if the person is;

(a) a qualified person for the purposes of regulation 6 of the EEA Regulations as a worker or a self-employed person;
(b) a family member of a person referred to in paragraph (a) within the meaning of regulation 7(1)(a), (b) or (c) of the EEA Regulations;
(c) a person who has a right to reside permanently in the United Kingdom by virtue of regulation 15(1)(c), (d) or (e) of the EEA Regulations;
(d) a person recorded by the Secretary of State as a refugee within the definition in Article 1 of the Convention relating to the Status of Refugees done at Geneva on 28 July 1951, as extended by Article 1(2) of the Protocol relating to the Status of Refugees done at New York on 31 January 1967;
(e) a person who has been granted, or who is deemed to have been granted, leave outside the rules made under section 3(2) of the Immigration Act 1971(b) where that leave is-
(1) discretionary leave to enter or remain in the United Kingdom,
(2) leave to remain under the Destitution Domestic Violence concession© which came into effect on 1st April 2012, or
(3) leave deemed to have been granted by virtue of regulation 3 of the Displaced Persons (Temporary protection) Regulations 2005(d);
(f) a person who has humanitarian protection granted under those rules;
(g) a person who is not a person subject to immigration control within the meaning of section 115(9) of the Immigration and Asylum Act 1999 and who is in the United Kingdom as a result of his deportation, expulsion or other removal by compulsion of law from another country to the United Kingdom.
(h) in receipt of income support, or on an income related employment and support allowance;
(ha) in receipt of an income based jobseekers allowance and has a right to reside other than a right to reside falling within paragraph (7.4);or
(i) a person who is treated as a worker for the purpose of the definition of 2qualified person2 in regulation 6(1) of the EEA Regulations pursuant to regulation 5 of the Accession of Croatia (immigration and Worker Authorisation) Regulations 2013(e) (right of residence of a Croatian who is an "accession state national subject to worker authorisation")

7.6 A person falls within this sub-paragraph if the person is a Crown servant or member of Her Majesty's forces posted overseas.

7.7 A person mentioned in sub-paragraph (6) is posted overseas if the person is performing overseas the duties of a Crown servant or member of Her Majesty's forces and was, immediately before the posting or the first consecutive postings, habitually resident in the United Kingdom.

7.8 In this paragraph

'claim for asylum' has the same meaning as in section 94(1) of the Immigration and Asylum Act 1999;

'EEA Regulations' means the Immigration (European Economic Area) Regulations 2006:

Persons subject to immigration control

7.9 Subject to paragraph (1A)" persons subject to immigration control are a class of person prescribed for the purposes of paragraph 2(9)(b) of Schedule 1A to the 1992 Act and which must not be included in an authority's scheme. "(1A) a person who is a national of a state which has ratified the European Convention on Social and medical Assistance(f) (done in Paris on 11th December 1953) or a state which has ratified the Council of Europe Social Charter (signed in Turin on 18th October 1961)and who is lawfully present in the United Kingdom is not a person subject to immigration control for the purposes of paragraph (1)"

7.10 "Person subject to immigration control" has the same meaning as in section 115(9) of the Immigration and Asylum Act 1999.

8.0 Temporary absence (period of absence)

8.1 Where a person is absent from the dwelling throughout any day then no support shall be payable

8.2 A person shall not, in relation to any day, which falls within a period of temporary absence from the dwelling, be a prescribed person under paragraph 8.1.

8.3 In paragraph 8.2, a 'period of temporary absence' means-

a. a period of absence not exceeding 4 weeks, beginning with the first whole day of absence from the dwelling, where and for so long as;
   i. the person intends to return to the dwelling;
   ii. the part of the dwelling in which he usually resided is not let or sub-let; and
   iii. that period is unlikely to exceed 4 weeks.

Sections 9 – 11

The family for council tax support purposes

9.0 Membership of a family

9.1 Within the council tax support scheme, 'family' means;

a. a married or unmarried couple;
b. married or unmarried couple and a member of the same household for whom one of them is or both are responsible and who is a child or a young person;
c. two people of the same sex who are civil partners of each other and are members of the same household (with or without children);
d. two people of the same sex who are not civil partners of each other but are living together as if they were civil partners (with or without children),
e. and for the purposes of sub-paragraph (d) two people of the same sex are to be regarded as living together as if they were civil partners if, but only if, they would be regarded as living together as husband and wife were they instead two people of the opposite sex;
f. except in prescribed circumstances, a person who is not a member of a married or unmarried couple and a member of the same household for whom that person is responsible and who is a child or a young person;

For the purposes of the scheme a child is further defined as a 'child or young person'
A 'child' means a person under the age of 16 and a 'Young Person' is someone aged 16 or over but under 20 and who satisfies other conditions. Those conditions are:

- they are aged 16, have left 'relevant education' or training, and 31 August following the sixteenth birthday has not yet been passed;
- they are aged 16 or 17, have left education or training, are registered for work, education or training, are not in remunerative work and are still within their 'extension period';
- they are on a course of full-time non-advanced education, or are doing 'approved training' and they began that education or training before reaching the age of 19;
- they have finished a course of full-time non-advanced education, but are enrolled on another such course (other than one provided as a result of their employment);
- they have left 'relevant education' or 'approved training' but have not yet passed their 'terminal date'.

9.2 Section 9.1 the definition of child or young person shall not apply to a person who is;

a. on income support;
b. an income-based jobseeker's allowance or an income-related employment and support allowance;
c. a person to whom section 6 of the Children (Leaving Care) Act 2000 (exclusion from benefits) applies.

9.3 The definition also includes a child or young person in respect of whom there is an entitlement to child benefit but only for the period that Child Benefit is payable

10.0 Circumstances in which a person is to be treated as responsible (or not responsible) for a child or young person.

10.1 Subject to the following paragraphs a person shall be treated as responsible for a child or young person who is normally living with him and this includes a child or young person to whom section 9.3 applies

10.2 Where a child or young person spends equal amounts of time in different households, or where there is a question as to which household he is living in, the child or young person shall be treated for the purposes of section 9.1 as normally living with;

a. the person who is receiving child benefit in respect of him; or
b. if there is no such person;
   i. where only one claim for child benefit has been made in respect of him, the person who made that claim; or
   ii. in any other case the person who has the primary responsibility for him.

10.3 For the purposes of this scheme a child or young person shall be the responsibility of only one person in any reduction week and any person other than the one treated as responsible for the child or young person under this section shall be treated as not so responsible.

11.0 Circumstances in which a child or young person is to be treated as being or not being a member of the household

11.1 Subject to sections 11.2 and 11.3, the applicant and any partner and, where the applicant or his partner is treated as responsible by virtue of section 10 (circumstances in which a person is to be treated as responsible or not responsible for a child or young person) for a child or young person, that child or young person and any child of that child or young person, shall be treated as members of the same household notwithstanding that any of them is temporarily absent from that household.

11.2 A child or young person shall not be treated as a member of the applicant's household where he is;

a. placed with the applicant or his partner by a local authority under section 23(2)(a) of the Children Act 1989 or by a voluntary organisation under section 59(1)(a) of the Act, or in Scotland boarded out with the applicant or his partner under a relevant enactment; or

b. placed, or in Scotland boarded out ant or his partner prior to adoption; or
c. placed for adoption with the applicant or his partner in accordance with the Adoption and Children Act 2002 or the Adoption Agencies (Scotland) Regulations 2009.

11.3 Subject to section 11.4, section 11.1 shall not apply to a child or young person who is not living with the applicant and he-

a. is being looked after by, or in Scotland is in the care of, a local authority under a relevant enactment; or
b. has been placed, or in Scotland boarded out, with a person other than the applicant prior to adoption; or
c. has been placed for adoption in accordance with the Adoption and Children Act 2002 or the Adoption Agencies (Scotland) Regulations 2009; or in accordance with an adoption allowance scheme made under section 71 of the Adoption and Children (Scotland) Act 2007 (adoption allowances schemes).

11.4 The authority shall treat a child or young person to whom section 11.3a) applies as being a member of the applicant's household in any reduction week where;

a. that child or young person lives with the applicant for part or all of that reduction week; and
b. the authority considers that it is responsible to do so taking into account the nature and frequency of that child's or young person's visits.

11.5 In this paragraph 'relevant enactment' means the Army Act 1955, the Air Force Act 1955, the Naval Discipline Act 1957, the Matrimonial Proceedings (Children) Act 1958, the Social Work (Scotland) Act 1968, the Family Law Reform Act 1969, the Children and Young Persons Act 1969, the Matrimonial Causes Act 1973, the Children Act 1975, the Domestic Proceedings and Magistrates' Courts Act 1978, the Adoption and Children (Scotland) Act 1978, the Family Law Act 1986, the Children Act 1989, the Children (Scotland) Act 1995 and the Legal Aid, Sentencing and Punishment of Offenders Act 2012.

Sections 12 – 29

Definition and the treatment of income for council tax support purposes

12.0 Calculation of income and capital of members of applicant's family and of a polygamous marriage

12.1 The income and capital of:
(a) an applicant; and
(b) any partner of that applicant,

is to be calculated in accordance with the provisions of this Part.

12.2 The income and capital of any partner of the applicant is to be treated as income and capital of the applicant, and in this Part any reference to the applicant applies equally to any partner of that applicant.

12.3 Where an applicant or the partner of an applicant is married polygamously to two or more members of his household:
(a) the applicant must be treated as possessing capital and income belonging to each such member; and
(b) the income and capital of that member is to be calculated in accordance with the following provisions of this Part in like manner as for the applicant.

12.4 In determining the income of an applicant
a. who has, or
b. who (jointly with his partner) has,
an award of Universal Credit the authority must, subject to the following provisions of this paragraph, use the calculation of the income prior to any earnings disregard of the applicant, or the applicant and his partner jointly (as the case may be), made by the Secretary of State for the purpose of determining the award of Universal Credit.

12.5 The authority must adjust the amount referred to in sub-paragraph (1) to take account of
(a) any sum to be disregarded under paragraphs of Schedule 1 to this scheme (sums to be disregarded in the calculation of earnings);
(b) any sum to be disregarded under paragraphs of Schedule 2 to this scheme (sums to be disregarded in the calculation of income other than earnings)

12.6 The amount for the award of Universal Credit is to be determined by multiplying the amount of the award by 12 and dividing the product by 52.

12.7 Section 33 (income and capital of non-dependant to be treated as applicant's) and 52 and 53 (disregards from income) apply (so far as relevant) for the purpose of determining any adjustments, which fall to be made to the figure for income under sub-paragraph (2)

12.8 In determining the capital of an applicant;
(a) who has, or
(b) who (jointly with his partner) has,
an award of Universal Credit, the authority must use the calculation or estimate of the capital of the applicant, or the applicant and his partner jointly (as the case may be), made by the Secretary of State for the purpose of determining that award

13.0 Circumstances in which capital and income of non-dependant is to be treated as applicant's

13.1 Where it appears to the authority that a non-dependant and the applicant have entered into arrangements in order to take advantage of the council tax support scheme and the non-dependant has more capital and income than the applicant, that authority shall, except where the applicant is on income support, an income-based jobseeker's allowance or an income-related employment and support allowance, treat the applicant as possessing capital and income belonging to that non-dependant, and, in such a case, shall disregard any capital and income which the applicant does possess.

13.2 Where an applicant is treated as possessing capital and income belonging to a non-dependant under section 13.1 the capital and income of that non-dependant shall be calculated in accordance with the following provisions in like manner as for the applicant and any reference to the 'applicant' shall, except where the context otherwise requires, be construed for the purposes of this scheme as if it were a reference to that non-dependant.

14.0 Calculation of income on a weekly basis

14.1 For the purposes of this scheme and in line with regulation 34 of the Housing Benefit Regulations 2006 (disregard to changes in tax, contributions, etc) the income of an applicant shall be calculated on a weekly basis;

a. by estimating the amount which is likely to be his average weekly income in accordance with this Section and in line with Sections 2, 3, 4 and 5 of Part 6 of the Housing Benefit Regulations 2006;
b. by adding to that amount the weekly income calculated in line with regulation 52 of the Housing Benefit Regulations 2006 (calculation to tariff income from capital); and
c. by then deducting any relevant child care charges to which section 18 (treatment of child care charges) applies from any earnings which form part of the average weekly income or,

in a case where the conditions in sub-paragraph (2) are met, from those earnings plus whichever credit specified in sub-paragraph (b) of that paragraph is appropriate, up to a maximum deduction in respect of the applicant's family of whichever of the sums specified in paragraph (3) applies in his case.

14.2 The conditions of this paragraph are that;

a. the applicant's earnings which form part of his average weekly income are less than the lower of either his relevant child care charges or whichever of the deductions specified in paragraph (3) otherwise applies in his case; and
b. that applicant or, if he is a member of a couple either the applicant or his partner, is in receipt of either working tax credit or child tax credit.

14.3 The maximum deduction to which section 14.1 c) above refers shall be;

a. where the applicant's family includes only one child in respect of whom relevant child care charges are paid, £175.00 per week.
b. where the applicant's family includes more than one child in respect of whom relevant child care charges are paid, £300.00 per week.

14.4 For the purposes of section 14.1 'income' includes capital treated as income under section 28 (capital treated as income) and income, which an applicant is treated as possessing under section 29 (notional income).

15.0 Treatment of child care charges

15.1 This section applies where an applicant is incurring relevant child-care charges and;

a. is a lone parent and is engaged in remunerative work;
b. is a member of a couple both of whom are engaged in remunerative work; or
c. is a member of a couple where one member is engaged in remunerative work and the other;
   i. is incapacitated;
   ii. is an in-patient in hospital; or
   iii. is in prison (whether serving a custodial sentence or remanded in custody awaiting trial or a sentence).

15.2 For the purposes of section 15.1 and subject to section 15.4, a person to whom section 15.3 applies shall be treated as engaged in remunerative work for a period not exceeding 28 weeks during which he-
a. is paid statutory sick pay;
b. is paid short-term incapacity benefit at the lower rate under sections 30A to 30E of the Act;
c. is paid an employment and support allowance;
d. is paid income support on the grounds of incapacity for work under regulation 4ZA of, and paragraph 7 or 14 of Schedule 1B to, the Income Support Regulations 1987; or
e. is credited with earnings on the grounds of incapacity for work or limited capability for work under regulation 8B of the Social Security (Credits) Regulations 1975.

15.3 This paragraph applies to a person who was engaged in remunerative work immediately before
a. the first day of the period in respect of which he was first paid statutory sick pay, short-term incapacity benefit, an employment and support allowance or income support on the grounds of incapacity for work; or
b. the first day of the period in respect of which earnings are credited, as the case may be.

15.4 In a case to which section 15.2 d) or e) applies, the period of 28 weeks begins on the day on which the person is first paid income support or on the first day of the period in respect of which earnings are credited, as the case may be.

15.5 Relevant child care charges are those charges for care to which sections 15.6 and 15.7 apply, and shall be calculated on a weekly basis in accordance with section 15.10.

15.6 The charges are paid by the applicant for care, which is provided

a. in the case of any child of the applicant's family who is not disabled, in respect of the period beginning on that child's date of birth and ending on the day preceding the first Monday in September following that child's fifteenth birthday; or
b. in the case of any child of the applicant's family who is disabled, in respect of the period beginning on that person's date of birth and ending on the day preceding the first Monday in September following that person's sixteenth birthday.

15.7 The charges are paid for care, which is provided by one, or more of the care providers listed in section 15.8 and are not paid-

a. in respect of the child's compulsory education;
b. by an applicant to a partner or by a partner to an applicant in respect of any child for whom either or any of them is responsible in accordance with section 10 (circumstances in which a person is treated as responsible or not responsible for another); or
c. in respect of care provided by a relative of the child wholly or mainly in the child's home.

15.8 The care to which section 15.7 refers may be provided;

a. out of school hours, by a school on school premises or by a local authority;
    i. for children who are not disabled in respect of the period beginning on their eighth birthday and ending on the day preceding the first Monday in September following their fifteenth birthday; or
    ii. for children who are disabled in respect of the period beginning on their eighth birthday and ending on the day preceding the first Monday in September following their sixteenth birthday; or
b. by a child care provider approved in accordance with by the Tax Credit (New Category of Child Care Provider) Regulations 1999;
c. by persons registered under Part 2 of the Children and Families (Wales) Measure 2010; or
d. by a person who is excepted from registration under Part 2 of the Children and Families (Wales) Measure 2010 because the child care that person provides is in a school or establishment referred to in article 11, 12, or 14 of the Child Minding and Day Care Exceptions (Wales) order 2010; or
e. by;
    i. persons registered under section 59(1) of the Public Services Reform Scotland Act 2010;
    or
    ii. local authorities registered under section 8(1) of that Act, where the care provided is child minding or day care within the meaning of that Act; or
f. by a person prescribed in regulations made pursuant to section 12(4) of the Tax Credits Act 2002 or
g. by a person who is registered under Chapter 2 or 3 of Part 3 of the Childcare Act 2006; or
h. by any of the schools mentioned in section 34(2) of the Childcare Act 2006 in circumstances where the requirement to register under Chapter 2 of Part 3 of that Act does not apply by virtue of section 34(2) of that Act; or
i. by any of the schools mentioned in section 53(2) of the Childcare Act 2006 in circumstances where the requirement to register under Chapter 3 of Part 3 of that Act does not apply by virtue of section 53(2) of that Act; or
j. by any of the establishments mentioned in section 18(5) of the Childcare Act 2006 in circumstances where the care is not included in the meaning of 'childcare' for the purposes of Part 1 and Part 3 of that Act by virtue of that subsection; or
k. by a foster parent or kinship carer under the Fostering Services Regulations 2002, the Fostering Services (Wales) Regulations 2003 or the Looked After Children (Scotland) Regulations 2009 in relation to a child other than one whom the foster parent is fostering or kinship carer is looking after; or
l. by a domiciliary care worker under the Domiciliary Care Agencies Regulations 2002 or the Domiciliary Care Agencies (Wales) Regulations 2004; or
m. by a person who is not a relative of the child wholly or mainly in the child's home.

15.9 In sections 15.6 and 15.8 a), 'the first Monday in September' means the Monday which first occurs in the month of September in any year.

15.10 Relevant child care charges shall be estimated over such period, not exceeding a year, as is appropriate in order that the average weekly charge may be estimated accurately having regard to information as to the amount of that charge provided by the child minder or person providing care.

15.11 For the purposes of section 15.1 c) the other member of a couple is incapacitated where

a. the support component or the work-related activity component on account of his having limited capability for work
b. the other member is treated as capable of work by virtue of a determination made in accordance with regulation made under section 171E of the Act;
c. the other member is treated as not having limited capability for work by virtue of a determination made in accordance with the Employment and Support Allowance Regulations 2008;
d. the applicant (within the meaning of this scheme) is, or is treated as, incapable of work and has been so incapable, or has been so treated as incapable, of work in accordance with the provisions of, and regulations made under, Part 12A of the Act (incapacity for work) for a continuous period of not less than 196 days; and for this purpose any two or more separate periods separated by a break of not more than 56 days shall be treated as one continuous period;
e. the applicant (within the meaning of this scheme) has, or is treated as having, limited capability for work and has had, or been treated as having, limited capability for work in accordance with the Employment and Support Allowance Regulations for a continuous period of not less than 196 days and for this purpose any two or more separate periods separated by a break of not more than 84 days must be treated as one continuous period;
f. there is payable in respect of him one or more of the following pensions or allowances-
    i. long-term incapacity benefit or short-tem incapacity benefit at the higher rate under Schedule 4 to the Act;
    ii. attendance allowance under section 64 of the Act;
    iii. severe disablement allowance under section 68 of the Act;
    iv. disability living allowance under section 71 of the Act;
    v. personal independence payment under Welfare Reform Act 2012;
    vi. an AFIP;
    vii. increase of disablement pension under section 104 of the Act;
    viii. a pension increase paid as part of a war disablement pension or under an industrial injuries scheme which is analogous to an allowance or increase of disablement pension under head (ii) (iv) or (v) above;
    ix. main phase employment and support
g. a pension or allowance to which head (ii), (iv), (v) or (vi) of sub-paragraph (f) above refers was payable on account of his incapacity but has ceased to be payable in consequence of his becoming a patient, which in this section shall mean a person (other than a person who is serving a sentence of imprisonment or detention in a youth custody institution) who is regarded as receiving free in-patient treatment within the meaning of social security (Hospital In-Patients) Regulations 2005;
h. an AFIP would be payable to that person but for any suspension of payment in accordance with any terms of the armed and reserve forces compensation scheme which allow for a suspension because a person is undergoing medical treatment in a hospital or similar institution;
i. paragraphs (f) or (g) would apply to him if the legislative provisions referred to in those sub-paragraphs were provisions under any corresponding enactment having effect in Northern Ireland; or
j. he has an invalid carriage or other vehicle provided to him by the Secretary of State under section 5(2)(a) of and Schedule 2 to the National Health Service Act 1977 or under section 46 of the National Health Service (Scotland) Act 1978 or provided by the Department of Health, Social Services and Public Safety in Northern Ireland under Article 30(1) of the Health and Personal Social Services (Northern Ireland) Order 1972.

15.12 For the purposes of section 15.11 once section 15.11d) applies to the applicant, if he then ceases, for a period of 56 days or less, to be incapable, or to be treated as incapable, of work, that paragraph shall, on his again becoming so incapable, or so treated as incapable, of work at the end of that period, immediately thereafter apply to him for so long as he remains incapable, or is treated as remaining incapable, of work.

15.13 For the purposes of section 15.11, once section 15.11e) applies to the applicant, if he then ceases, for a period of 84 days or less, to have, or be treated as having, limited capability for work, that paragraph is, on his again having, or being treated as having, limited capability for work at the end of that period, immediately thereafter apply to him for so long as he has, or is treated as having, limited capability for work.

15.14 For the purposes of sections 15.6 and 15.8 a), a person is disabled if he is a person-

a. in respect of whom disability living allowance or personal independence payment is payable, or has ceased to be payable solely because he is a patient;
b. who is registered as blind in a register compiled under section 29 of the National Assistance Act 1948 welfare services) or, in Scotland, has been certified as blind and in consequence he is registered as blind in a register maintained by or on behalf of a council constituted under section 2 of the Local Government (Scotland) Act 1994; or
c. who ceased to be registered as blind in such a register within the period beginning 28 weeks before the Monday in September following that person's fifteenth birthday and ending on the day preceding that person's sixteenth birthday.

15.15 For the purposes of section 15.1 a woman on maternity leave, paternity leave or adoption leave shall be treated as if she is engaged in remunerative work for the period specified in section 15.16 ('the relevant period') provided that-

a. in the week before the period of maternity leave, paternity leave or adoption leave began she was in remunerative work;
b. the applicant is incurring relevant child care charges within the meaning of section 15.5; and
c. she is entitled to either statutory maternity pay under section 164 of the Act, statutory paternity pay by virtue of section 171ZA or 171ZB of the Act, statutory adoption pay by of section 171ZL of the Act, maternity allowance under section 35 of the Act or qualifying support.

15.16 For the purposes of section 15.15 the relevant period shall begin on the day on which the person's maternity, paternity leave or adoption leave commences and shall end on-

a. the date that leave ends;
b. if no child care element of working tax credit is in payment on the date that entitlement to maternity allowance, qualifying support, statutory maternity pay, statutory paternity pay or statutory adoption pay ends, the date that entitlement ends; or
c. if a child care element of working tax credit is in payment on the date that entitlement to maternity allowance or qualifying support, statutory maternity pay or statutory adoption pay ends, the date that entitlement to that award of the child care element of the working tax credits ends.

whichever shall occur first.

15.17 In sections 15.15 and 15.16

a. **'qualifying support'** means income support to which that person is entitled by virtue of paragraph 14B of Schedule 1B to the Income Support Regulations 1987; and

b. **'child care element'** of working tax credit means the element of working tax credit prescribed under section 12 of the Tax Credits Act (child care element) 2002.

16.0 Average weekly earnings of employed earners

16.1 Where an applicant's income consists of earnings from employment as an employed earner his average weekly earnings shall be estimated by reference to his earnings from that employment-

a. over a period immediately preceding the reduction week in which the claim is made or treated as made and being a period of
   i. 5 weeks, if he is paid weekly; or
   ii. 2 months, if he is paid monthly; or
b. whether or not sub-paragraph 16.1a i) or ii) applies; where an applicant's earnings fluctuate, over such other period preceding the reduction week in which the claim is made or treated as made as may, in any particular case, enable his average weekly earnings to be estimated more accurately.

16.2 Where the applicant has been in his employment for less than the period specified in section 16.1a)(i) or (ii)

a. if he has received any earnings for the period that he has been in that employment and those earnings are likely to represent his average weekly earnings from that employment his average weekly earnings shall be estimated by reference to those earnings;
b. in any other case, the authority shall require the applicant's employer to furnish an estimate of the applicant's likely weekly earnings over such period as the authority may require and the applicant's average weekly earnings shall be estimated by reference to that estimate.

16.3 Where the amount of an applicant's earnings changes during an award the authority shall estimate his average weekly earnings by reference to his likely earnings from the employment over such period as is appropriate in order that his average weekly earnings may be estimated accurately but the length of the period shall not in any case exceed 52 weeks.

16.4 For the purposes of this section the applicant's earnings shall be calculated in accordance with sections 22 and 23.

17.0 Average weekly earnings of self-employed earners

17.1 Where an applicant's income consists of earnings from employment as a self-employed earner his average weekly earnings shall be estimated by reference to his earnings from that employment over such period as is appropriate in order that his average weekly earnings may be estimated accurately but the length of the period shall not in any case exceed a year.

17.2 For the purposes of this section the applicant's earnings shall be calculated in accordance with sections 24 and 25 of this scheme.

18.0 Average weekly income other than earnings

18.1 An applicant's income which does not consist of earnings shall, except where section 15.2 applies, be estimated over such period as is appropriate in order that his average weekly income may be estimated accurately but the length of the period shall not in any case exceed 52 weeks; and nothing in this paragraph shall authorise the authority to disregard any such income other than that specified in Schedule 2 of this scheme.

18.2 The period over which any benefit under the benefit Acts is to be taken into account shall be the period in respect of which that support is payable.

18.3 For the purposes of this section income other than earnings shall be calculated in accordance with sections 27 to 29 of this scheme.

19.0 Calculation of average weekly income from tax credits

19.1 This section applies where an applicant receives a tax credit.

19.2 Where this sections applies, the period in which credit is to be taken into account shall be the period set out in section 19.3

19.3 Where the instalment in respect of which payment of a tax credit is made is;

a. a daily instalment, the period is 1 day, being the day in respect of which the instalment is paid;
b. a weekly instalment, the period is 7 days, ending on the day on which the instalment is due to be paid;
c. a two-weekly instalment, the period is 14 days, commencing 6 days before the day on which the instalment is due to be paid;
d. a four-weekly instalment, the period is 28 days, ending on the day on which the instalment is due to be paid;

19.4 For the purposes of this section 'tax credit' means child tax credit or working tax credit.

20.0 Calculation of weekly income

20.1 For the purposes of sections 16 (average weekly earnings of employed earners); 18 (average weekly income other than earnings) and 19 (calculation of average weekly income from tax credits), where the period in respect of which a payment is made;

a. does not exceed a week, the weekly amount shall be the amount of that payment;
b. exceeds a week, the weekly amount shall be determined-
   i. in a case where that period is a month, by multiplying the amount of the payment by 12 and dividing the product by 52;
   ii. in any other case, by dividing the amount of the payment by the number equal to the number of days in the period to which it relates and multiplying the product by 7.

20.2 For the purpose of section 17 (average weekly earnings of self-employed earners) the weekly amount of earnings of an applicant shall be determined by dividing his earnings overt he assessment period by the number equal to the number of days in that period and multiplying the product by 7.

21.0 Disregard of changes in tax, contributions, etc

21.1 In calculating the applicant's income the appropriate authority may disregard any legislative change

a. in the basic or other rates of income tax;
b. in the amount of any personal tax relief;
c. in the rates of social security contributions payable under the Act or in the lower earnings limit or upper earnings limit for Class 1 contributions under the Act, the lower or upper limits applicable to Class 4 contributions under the Act or the amount specified in section 11(4) of the Act (small earnings exception in relation to Class 2 contributions);
d. in the amount of tax payable as a result of an increase in the weekly rate of Category A, B, C, or D retirement pension or any addition thereto or any graduated pension payable under the Act;
e. in the maximum rate of child tax credit or working tax credit,

for a period not exceeding 30 reduction weeks beginning with the reduction week immediately following the date from which the change is effective.

22.0 Earnings of employed earners

22.1 Subject to section 22.2, 'earnings' means in the case of employment as an employed earner, any remuneration or profit derived from that employment and includes-

a. any bonus or commission;

b. any payment in lieu of remuneratio riodic sum paid to an applicant on account of the termination of his employment by reason of redundancy;
c. any payment in lieu of notice or any lump sum payment intended as compensation for the loss of employment but only in so far as it represents loss of income;
d. any holiday pay except any payable more than 4 weeks after termination or interruption of the employment;
e. any payment by way of a retainer;
f. any payment made by the applicant's employer in respect of expenses not wholly, exclusively and necessarily incurred in the performance of the duties of the employment, including any payment made by the applicant's employer in respect of-
g. (i) travelling expenses incurred by the applicant between his home and his place of employment;
(ii) expenses incurred by the applicant under arrangements made for the care of a member of his family owing to the applicant's absence from home;
h. any award of compensation made under section 112(4) or 117(3)(a) of the Employment Rights Act 1996 (remedies and compensation for unfair dismissal);
i. any payment or remuneration made under section 28, 34, 64, 68, or 70 of the Employment Rights Act 1996 (right to guarantee payments, remuneration on suspension on medical or maternity grounds, complaints to employment tribunals);
j. any such sum as is referred to in section 112 of the Act (certain sums to be earnings for social security purposes);
k. any statutory sick pay, statutory maternity pay, statutory paternity pay or statutory adoption pay, or a corresponding payment under any enactment having effect in Northern Ireland;
l. any remuneration paid by or on behalf of an employer to the applicant who for the time being is on maternity leave, paternity leave or adoption leave or is absent from work because he is ill;
m. the amount of any payment by way of a non-cash voucher which has been taken into account in the computation of a person's earnings in accordance with Part 5 of Schedule 3 to the Social Security (Contributions) Regulations 2001.

22.2 Earnings shall not include-

a. subject to section 22.3, any payment in kind;
b. any payment in respect of expenses wholly, exclusively and necessarily incurred in the performance of the duties of employment;
c. any occupational pension;
d. any payment in respect of expenses arising out of the applicant's participation as a service user.

22.3 Section 22.2a) shall not apply in respect of any non-cash voucher referred to in section 22.1m).

23.0 Calculation of net earnings of employed earners

23.1 For the purposes of section 16 (average weekly earnings of employed earners), the earnings of an applicant derived or likely to be derived from employment as an employed earner to be taken into account shall, subject to section 23.2, be his net earnings.

23.2 There shall be disregarded from an applicant's net earnings, any sum, where applicable, specified in Schedule 1.

23.3 For the purposes of section 23.1 net earnings shall, except where section 26.6 applies, be calculated by taking into account the gross earnings of the applicant from that employment over the assessment period, less;

a. any amount deducted from those earnings by way of
(i) income tax;
ii) primary Class 1 contributions under the Act;
b. one-half of any sum paid by the applicant by way of a contribution towards an occupational pension scheme;

c. one-half of the amount calculated in accordance with section 23.5 in respect of any qualifying contribution payable by the applicant; and
d. where those earnings include a payment which is payable under any enactment having effect in Northern Ireland and which corresponds to statutory sick pay, statutory maternity pay, statutory paternity pay or statutory adoption pay, any amount deducted for those earnings by way of any contributions which are payable under any enactment having effect in Northern Ireland and which correspond to primary Class 1 contributions under the Act.

23.4 In this section 'qualifying contribution' means any sum which is payable periodically as a contribution towards a personal pension scheme.

23.5 The amount in respect of any qualifying contribution shall be calculated by multiplying the daily amount of the qualifying contribution by the number equal to the number of days in the assessment period; and for the purposes of this section the daily amount of the qualifying contribution shall be determined-
a. where the qualifying contribution is payable monthly, by multiplying the amount of the qualifying contribution by 12 and dividing the product by 365;
b. in any other case, by dividing the amount of the qualifying contribution by the number equal to the number of days in the period to which the qualifying contribution relates.

23.6 Where the earnings of an applicant are estimated under sub-paragraph (b) of paragraph 2) of the section 16 (average weekly earnings of employed earners), his net earnings shall be calculated by taking into account those earnings over the assessment period, less-

a. an amount in respect of income tax equivalent to an amount calculated by applying to those earnings the basic rate of tax applicable to the assessment period less only the personal relief to which the applicant is entitled under sections 257(1) of the Income and Corporation Taxes Act 1988 (personal allowances) as is appropriate to his circumstances but, if the assessment period is less than a year, the earnings to which the basic rate of tax is to be applied and the amount of the personal relief deductable under this sub-paragraph shall be calculated on a pro rata basis;
b. an amount equivalent to the amount of the primary Class 1 contributions that would be payable by him under the Act in respect of those earnings if such contributions were payable; and
c. one-half of any sum which would be payable by the applicant by way of a contribution towards an occupational or personal pension scheme, if the earnings so estimated were actual earnings.

24.0 Earnings of self-employed earners

24.1 Subject to section 24.2, 'earnings' in the case of employment as a self-employed earner, means the gross income of the employment plus any allowance paid under section 2 of the 1973 Act or section 2 of the Enterprise and New Towns (Scotland) Act 1990 to the applicant for the purpose of assisting him in carrying on his business unless at the date of claim the allowance has been terminated.

24.2 'Earnings' shall not include any payment (in respect of a person accommodated with the applicant under arrangements made by a local authority or voluntary organisation and payments made to the applicant by a health authority, local authority or voluntary organisation in respect of persons temporarily in the applicant's care) nor shall it include any sports award.

24.3 This paragraph applies to-

a. royalties or other sums paid as a consideration for the use of, or the right to use, any copyright, design, patent or trade mark; or
b. any payment in respect of any-
   (i) book registered under the Public Lending Right Scheme 1982; or
   (ii) work made under any international public lending right scheme that is analogous to the Public Lending Right Scheme 1982, where the applicant is the first owner of the

copyright, design, patent or in original contributor to the book of work concerned.

24.4 Where the applicant's earnings consist of any items to which section 24.3 applies, those earnings shall be taken into account over a period equal to such number of weeks as is equal to the number obtained (and any fraction is to be treated as a corresponding fraction of a week) by dividing the earnings by

(a) the amount of the reduction under this scheme which would be payable had the payment not been made, plus
(b) an amount equal to the total of the sums which would fall to be disregarded from the payment under Schedule 1 (sums to be disregarded in the calculation of earnings) as appropriate in the applicant's case.

25.0 Calculation of net profit of self-employed earners

25.1 For the purposes of section 17 (average weekly earnings of self-employed earners) the earnings of an applicant to be taken into account shall be

a. in the case of a self-employed earner who is engaged in employment on his own account, the net profit derived from that employment;
b. in the case of a self-employed earner whose employment is carried on in partnership or is that of a share fisherman within the meaning of the Social Security (Mariners' Benefits) Regulations 1975, his share of the net profit derived from that employment, less-

i. an amount in respect of income tax and of national insurance contributions payable under the Act calculated in accordance with section 26 (deduction of tax and contributions for self-employed earners); and
ii. one-half of the amount calculated in accordance with section 25.11 in respect of any qualifying premium.

25.2 There shall be disregarded from an applicant's net profit, any sum, where applicable, specified in paragraph Schedule 1.

25.3 For the purposes of section 25.1a) the net profit of the employment must, except where section 25.9 applies, be calculated by taking into account the earnings for the employment over the assessment period less

a. subject to sections 25.5 to 25.7, any expenses wholly and exclusively incurred in that period for the purposes of that employment;
b. an amount in respect of;
   (i) income tax, and
   (ii) national insurance contributions payable under the Act, calculated in accordance with section 26 (deduction of tax and contributions for self-employed earners); and
c. one-half of the amount calculated in accordance with section 25.11 in respect of any qualifying premium.

25.4 For the purposes of section 25.1b) the net profit of the employment shall be calculated by taking into account the earnings of the employment over the assessment period less, subject to sections 25.5 to 25.7, any expenses wholly and exclusively incurred in that period for the purposes of the employment.

25.5 Subject to section 25.6 no deduction shall be made under section 25.3a or 25.4, in respect of-

a. any capital expenditure;
b. the depreciation of any capital asset;
c. any sum employed or intended to be employed in the setting up or expansion of the employment;
d. any loss incurred before the beginning of the assessment period;

e. the repayment of capital on any loan used for the purposes of the employment;
f. any expenses incurred in providing business entertainment, and
g. any debts, except bad debts proved to be such, but this sub-paragraph shall not apply to any expenses incurred in the recovery of a debt.

25.6 A deduction shall be made under section 25.3a) or 25.4 in respect of the repayment of capital on any loan used for-

a. the replacement in the course of business of equipment or machinery; and
b. the repair of an existing business asset except to the extent that any sum is payable under an insurance policy for its repair;

25.7 The authority shall refuse to make deduction in respect of any expenses under section 25.3a) or 25.4 where it is not satisfied given the nature and the amount of the expense that it has been reasonably incurred.

25.8 For the avoidance of doubt-

a. deduction shall not be made under section 25.3a) or 25.4 in respect of any sum unless it has been expended for the purposes of the business;
b. a deduction shall be made thereunder in respect of-
   i. the excess of any value added tax paid over value added tax received in the assessment period;
   ii. any income expended in the repair of an existing business asset except to the extent that any sum is payable under an insurance policy for its repair;
   iii. any payment of interest on a loan taken out for the purposes of the employment

25.9 Where an applicant is engaged in employment, as a child minder the net profit of the employment shall be one-third of the earnings of that employment, less an amount in respect of
a. income tax; and
b. National Insurance contributions payable under the Act, calculated in accordance with section 26 (deduction of tax and contributions for self-employed earners); and
c. one-half of the amount calculated in accordance with section 25.1 in respect of any qualifying contribution

25.10 For the avoidance of doubt where an applicant is engaged in employment as a self-employed earner and he is also engaged in one or more other employments as a self-employed or employed earner any loss incurred in any one of his employments shall not be offset against his earnings in any other of his employments.

25.11 The amount in respect of any qualifying premium shall be calculated by multiplying the daily amount of the qualifying premium by the number equal to the number of days in the assessment period; and for the purposes of this section the daily amount of the qualifying premium shall be determined

a. where the qualifying premium is payable monthly, by multiplying the amount of the qualifying premium by 12 and dividing the product by 365;
b. in any case, by dividing the amount of the qualifying premium by the number equal to the number of days in the period to which the qualifying premium relates.

25.12 In this section, 'qualifying premium' means any premium which is payable periodically in respect of a personal pension scheme and is so payable on or after the date of claim.

26.0 Deduction of tax and contributions of self-employed earners

26.1 The amount to be deducted in respect of income tax under section 25.1b)i), 25.3b)i) or 25.9a)i) (calculation of net profit of self-employed earners) shall be calculated on the basis of the amount of chargeable income and as if that income were assessable to income tax at the basic rate of tax applicable to the assessment period less only the personal relief to which the applicant is entitled

under section 257(1) of the Income and Taxes Act 1988 (personal allowances) as is appropriate to his circumstances; but, if the assessment period is less than a year, the earnings to which the basic rate of tax is to be applied and the amount of the personal reliefs deductible under this paragraph shall be calculated on a pro rata basis.

26.2 The amount to be deducted in respect of national insurance contributions under sections 25.11b)i); 25.3b)ii) or 25.9a) shall be the total of-

a. the amount of Class 2 contributions payable under section 11(1) or, as the case may be, 11(3) of the Act at the rate applicable to the assessment period except where the applicant's chargeable income is less than the amount specified in section 11(4) of the Act (small earnings exceptions) for the tax year applicable to the assessment period; but if the assessment period is less than a year, the amount specified for that tax year shall be reduced pro rata; and
b. the amount of Class 4 contributions (if any) which would be payable under section 15 of the Act (Class 4 contributions recoverable under the Income Tax Acts) at the percentage rate applicable to the assessment period on so much of the chargeable income as exceeds the lower limit but does not exceed the upper limit of profits and gains applicable for the tax year applicable to the assessment period; but if the assessment period is less than a year, those limits shall be reduced pro rata.

26.3 In this section 'chargeable incomes' means-

a. except where sub-paragraph (b) applies, the earnings derived from the employment less any expenses deducted under section (25.3)(a) or, as the case may be, (25.4) of section 25;
b. in the case of employment as a child minder, one-third of the earnings of that employment.

27.0 Calculation of income other than earnings

27.1 For the purposes of section 18 (average weekly income other than earnings), the income of an applicant which does not consist of earnings to be taken into account shall, subject to sections 24.2 to 24.4, be his gross income and any capital treated as income under section 28 (capital treated as income).

27.2 There is to be disregarded from the calculation of an applicant's gross income under section 27.2, any sum, where applicable, specified in Schedule 2.

27.3 Where the payment of any benefit under the benefit Acts is subject to any deduction by way of recovery the amount to be taken into account under section 27.1 shall be the gross amount payable.

27.4 Where the applicant or, where he is a member of a couple, his partner is receiving a contributory employment and support allowance and that benefit has been reduced under regulation 63 of the Employment and Support Allowance Regulations 2008, the amount of that benefit to be taken into account is the amount as if it had not been reduced.

27.5 Where an award of any working tax credit or child tax credit under the Tax Credits Act 2002 is subject to a deduction by way of recovery of an overpayment of working tax credit or child tax credit which arose in a previous tax year the amount to be taken into account under section 21.1 shall be the amount of working tax credit or child tax credit awarded less the amount of that deduction.

27.6 In section 27.5 'tax year' means a period beginning with 6 April in one year and ending with 5 April in the next.

27.7 Section 27.8 and 27.9 apply where a relevant payment has been made to a person in an academic year; and that person abandons, or is dismissed from, his course of study before the payment to him of the final instalment of the relevant payment.

27.8 Where a relevant payment is made qua nt of a relevant payment to be taken into account for the assessment period for the purposes of section 27.1 in respect of a person to whom section 27.7 applies, shall be calculated by applying the formula-

$$\frac{A-(BxC)}{D}$$

Where

A = the total amount of the relevant payment which that person would have received had he remained a student until the last day of the academic term in which he abandoned, or was dismissed from, his course, less any deduction under section 48.5.

B = the number of support weeks from the support week immediately following that which includes the first day of that academic year to the support week which includes the day on which the person abandoned, or was dismissed from, his course;

C = the weekly amount of the relevant payment, before the application of the £10 disregard, which would have been taken into account as income under section 48.2 had the person not abandoned or been dismissed from, his course and, in the case of a person who was not entitled to council tax support immediately before he abandoned or was dismissed from his course, had that person, at that time, been entitled to housing benefit;

D = the number of support weeks in the assessment period.

27.9 Where a relevant payment is made by two or more instalments in a quarter, the amount of a relevant payment to be taken into account for the assessment period for the purposes of section 27.1 in respect of a person to whom section 27.8 applies, shall be calculated by applying the formula in section 27.8 but as if-

A = the total amount of relevant payments which that person received, or would have received, from the first day of the academic year to the day the person abandoned the course, or was dismissed from it, less any deduction under section 48.5.

27.10 In this section-'academic year' and 'student loan' shall have the same meanings as for the purposes of sections 40 to 42, 'assessment period' means-

a. in a case where a relevant payment is made quarterly, the period beginning with the reduction week which includes the day on which the person abandoned, or was dismissed from, his course and ending with the reduction week which includes the last day of the last quarter for which an instalment of the relevant payment was payable to that person;
b. in a case where the relevant payment is made by two or more instalments in a quarter, the period beginning with the reduction week which includes the day on which the person abandoned, or was dismissed from, his course and ending with the reduction week which includes-
    i. the day immediately before the day on which the next instalment of the relevant payment would have been due had the payments continued; or
    ii. the last day of the last quarter for which an instalment of the relevant payment was payable to that person.

whichever of those dates is earlier

'quarter' in relation to an assessment period means a period in that year beginning on;

a. 1 January and ending on 31 March;
b. 1 April and ending on 30 June;
c. 1 July and ending on 31 August; or
d. 1 September and ending on 31 December;

'relevant payment' means either a student loan or an amount intended for the maintenance of dependants referred to in section 43.7 or both.

27.11 For the avoidance of doubt there shall be included as income to be taken into account under section 27.1

a. any payment to which section 22.2 (payments not earnings) applies; or
b. in the case of an applicant who is receiving support under section 95 or 98 of the Immigration and Asylum Act 1999 including support provided by virtue of regulations made under Schedule 9 to that Act, the amount of such support provided in respect of essential living needs of the applicant and his dependants (if any) as is specified in regulations made under section 3 of Schedule 8 to the Immigration and Asylum Act 1999.

28.0 Capital treated as income

28.1 Any capital payable by instalments which are outstanding at the date on which the claim is made or treated as made, or, at the date of any subsequent revision or supersession, shall, if the aggregate of the instalments outstanding and the amount of the applicant's capital otherwise calculated in accordance with sections 28 to 39 of this scheme exceeds £6,000, be treated as income.

28.2 Any payment received under an annuity shall be treated as income.

28.3 Any earnings to the extent that they are not a payment of income shall be treated as income.

28.4 Any Career Development Load paid pursuant to section 2 of the Employment and Training Act 1973 Act shall be treated as income.

28.5 Where an agreement or court order provides that payments shall be made to the applicant in consequence of any personal injury to the applicant and that such payments are to be made, wholly or partly, by way of period payments, any such periodic payments received by the applicant (but not a payment which is treated as capital), shall be treated as income.

29.0 Notional Income

29.1 An applicant shall be treated as possessing income of which he has deprived himself for the purpose of securing entitlement of support or increasing the amount of that support.

29.2 Except in the case of-

a. a discretionary trust;
b. a trust derived from a payment made in consequence of a personal injury;
c. a personal pension scheme, occupational pension scheme or a payment made by the Board of the Pension Protection Fund where the applicant has not attained the qualifying age for state pension credit;
d. any sum to which section 46(2)(a) of Schedule 4 (capital to be disregarded) applies which is administered in the way referred to in section 46(1)(a);
e. any sum to which section 47(a) of Schedule 4 refers;
f. rehabilitation allowance made under section 2 of the 1973 Act;
g. child tax credit; or
h. working tax credit;
i. any sum to which section 29.11 applies;

any income which would become available to the applicant upon application being made, but which has not been acquired by him, shall be treated as possessed by the applicant but only from the date on which it could be expected to be acquired were an application made.

29.3 Any payment of income, other than a payment of income specified in section 29.4 made-

a. to a third party in respect of a single applicant or a member of the family (but not a member of the third party's family) shall, where that payment is a payment of an occupational pension, a pension or other periodical payment made under or by a personal pension scheme or a payment made by the Board of the Pension Protection Fund, be treated as possessed by that single applicant or, as the case may be, by that member;

b. to a third party in respect of a single applicant or in respect of a member of the family (but not a member of the third party's family) shall, where it is not a payment referred to in sub-section a), be treated as possessed by that single applicant or by that member to the extent that it is used for the food, ordinary clothing or footwear, household fuel or rent of that single applicant or, as the case may be, of any member of that family or is used for any council tax or water charges for which that applicant or member is liable;

b. to a single applicant or a member of the family in respect of a third party (but not in respect of another member of that family) shall be treated as possessed by that single applicant or, as the case may be, that member of the family to the extent that it is kept or used by him or used by or on behalf of any member of that family.

29.4 Section 29.3 shall not apply in respect of a payment of income made-

a. under the Macfarlane Trust, the Macfarlane (Special Payments) Trust, the Macfarlane (Special Payments) (No 2) Trust, the Fund, The Eileen Trust, MFET Limited, the Skipton Fund, the Caxton Foundation or the Independent Living Fund (2006);
b. pursuant to section 19(1)(a) of the Coal Industry Act 1994 (concessionary coal);
c. pursuant to section 2 of the 1973 Act in respect of a person's participation-
   (i) in an employment programme specified in regulation 75(1)(a)(ii) of the Jobseeker's Allowance Regulations;
   (ii) in a training scheme specified in regulation 75(1)(b)(ii) of those Regulations;
   (iii) in the Intense Activity Period specified in regulation 75(1)(a)(iv) of those Regulations;
   (iv) in a qualifying course within the meaning specified in regulation 17A(7) of those Regulations or;
   (v) in the Flexible New Deal specified in regulation 75(1)(a)(v) of those Regulations;
d. in respect of a previous participation in the Mandatory Work Activity Scheme;
e. under an occupational pension scheme, in respect of a pension or other periodical payment made under a personal pension scheme or a payment made by the Board of the Pension Protection Fund where-
   (i) a bankruptcy order has been made in respect of the person in respect of whom the payment has been made or, in Scotland, the estate of that person is subject to sequestration or judicial factor has been appointed on that person's estate under section 41 of the Solicitors (Scotland) Act 1980;
   (ii) the payment is made to the trustee in bankruptcy or any other person acting on behalf of the creditors; and
   (iii) the person referred to in (i) and any member of his family does not possess, or is not treated as possessing, any income apart from that payment.

29.5 Where an applicant is in receipt of any benefit (other than council tax support) under the benefit Acts and the rate of that benefit is altered with effect from a date on or after 1 April in any year but not more than 14 days thereafter, the authority shall treat the applicant as possessing such benefit at the altered rate from either 1 April or the first Monday in April in that year, whichever date the authority shall select to apply in its area, to the date on which the altered rate is to take effect.

29.6 Subject to section 29.7, where-

a. applicant performs a service for another person; and
b. that person makes no payment of earnings or pays less than that paid for a comparable employment in the area, the authority shall treat the applicant as possessing such earnings (if any) as is reasonable for that employment unless the applicant satisfies the authority that the means of that person are insufficient for him to pay or to pay more for the service.

29.7 Section 29.6 shall not apply-

a. to an applicant who is engaged by a charitable or voluntary organisation or who is a volunteer if the authority is satisfied in any of those cases that it is reasonable for him to provide those services free of charge; or

b. in a case where the service is performed in connection with-
   (i) the applicant's participation in an employment or training programme in accordance with regulation 19(1)(q) of the Job Seeker's Allowance Regulations, other than where the service is performed in connection with the applicant's participation in the Intense Activity Period specified in regulation 75(1)(a)(iv) of those Regulations or
   (ii) the applicant's or the applicant's partner's participation in an employment or training programme as defined in regulation 19(3) of those Regulations for which a training allowance is not payable or, where such an allowance is payable, it is payable for the sole purpose of reimbursement of travelling or meal expenses to the person participating in that programme; or
c. to an applicant who is participating in a work placement approved by the Secretary of State (or a person providing services to the Secretary of State) before the placement starts.

29.8 In section 29.7(c) 'work placement' means practical work experience which is not undertaken in expectation of payment

29.9 Where an applicant is treated as possessing any income under any of section 29.1 to 29.5, the foregoing provisions of this scheme shall apply for the purposes of calculating the amount of that income as if a payment has actually been made and as if it were actual income which he does possess.

29.10 Where an applicant is treated as possessing any earnings under section 29.6 the foregoing provisions of this scheme shall apply for the purposes of calculating the amount of those earnings as if a payment had actually been made and as if they were actual earnings which he does possess except that paragraph (3) of section 23 (calculation of net earnings of employed earners) shall not apply and his net earnings shall be calculated by taking into account those earnings which he treated as possessing, less;

a. an amount in respect of income tax equivalent to an amount calculated by applying to those earnings the starting rate or, as the case may be, the starting rate and the basic rate of tax applicable to the assessment period less only the personal relief to which the applicant is entitled under sections 257(1) of the Income and Corporation Taxes Act 1988 (personal allowances) as is appropriate to his circumstances; but, if the assessment period is less than a year, the earnings to which the starting rate of tax is to be applied and the amount of the personal relief deductible under this sub-paragraph shall be calculated on a pro rate basis;

c. an amount equivalent to the amount of the primary Class 1 contributions that would be payable by him under the Act in respect of those earnings if such contributions were payable; and

c. one-half of any sum payable by the applicant by way of a contribution towards an occupational or personal pension scheme.

29.11 Sections 29.1, 29.2, 29.3 and 29.6 shall not apply in respect of any amount of income other than earnings, or earnings of an employed earner, arising out of the applicant's participation as a service user.

Sections 30 - 39

Definition and the treatment of capital for council tax support purposes

30.0 Capital Limit

30.1 For the purposes of this scheme, the prescribed amount is £6,000 and no support shall be granted when the applicant has an amount greater than this level.

31.0 Calculation of capital

31.1 For the purposes of this scheme, the capital of an applicant to be taken into account shall, subject to section 31.2, be the whole of his capital calculated in accordance with this scheme and any income treated as capital under section 33 (income treated as capital).

31.2 There shall be disregarded from the calculation of an applicant's capital under section 31.1, any capital, where applicable, specified in Schedule 4.

32.0 Disregard of capital of child and young person

32.1 The capital of a child or young person who is a member of the applicant's family shall not be treated as capital of the applicant.

33.0 Income treated as capital

33.1 Any bounty derived from employment and paid at intervals of at least one year shall be treated as capital.

33.2 Any amount by way of a refund of income tax deducted from profits or emoluments chargeable to income tax under Schedule D or E shall be treated as capital.

33.3 Any holiday pay which is not earnings under section 22(1)(d) (earnings of employed earners) shall be treated as capital.

33.4 Except any income derived from capital disregarded under sections 1, 2, 4, 8, 14 or 25 to 28, 47 or 48 of Schedule 4, any income derived from capital shall be treated as capital but only from the date it is normally due to be credited to the applicant's account.

33.5 In the case of employment as an employed earner, any advance of earnings or any loan made by the applicant's employer shall be treated as capital.

33.6 Any charitable or voluntary payment which is not made or due to be made at regular intervals, other than a payment which is made under or by the Trusts, the Fund, the Eileen Trust, MFET Limited, the Skipton Fund, the Caxton Foundation, the Independent Living Fund (2006) or the London Bombings Charitable Relief Fund, shall be treated as capital.

33.7 There shall be treated as capital the gross receipts of any commercial activity carried on by a person in respect of which assistance is received under the self-employment route, but only in so far as those receipts were payable into a special account during the period in which that person was receiving such assistance.

33.8 Any arrears of subsistence allowance which are paid to an applicant as a lump sum shall be treated as capital.

33.9 Any arrears of working tax credit or child tax credit shall be treated as capital.

34.0 Calculation of capital in the United Kingdom

34.1 Capital which an applicant possesses in the United Kingdom shall be calculated at its current market or surrender value less-

a. where there would be expenses attributable to the sale, 10 per cent; and
b. the amount of any encumbrance secured on it;

35.0 Calculation of capital outside the United Kingdom

35.1 Capital which an applicant possesses in a country outside the United Kingdom shall be calculated

a. in a case where there is no prohibition in force in that country against the transfer to the United Kingdom of an amount equal to its current market or surrender value in that country, at that value.
b. in a case where there is such prohibition, at the price which it would realise if sold in the United Kingdom to a willing buyer,

less, where there would be expenses attributable to sale, 10 per cent, and the amount of any encumbrances secured on it.

36.0 Notional capital

36.1 An applicant shall be treated as possessing capital of which he has deprived himself for the purpose of securing entitlement to council tax support or increasing the amount of that support except to the extent that that capital is reduced in accordance with section 37 (diminishing notional capital rule).

36.2 Except in the case of

(a) a discretionary trust; or
(b) a trust derived from a payment made in consequence of a personal injury; or
(c) any loan which would be obtained only if secured against capital disregarded under Schedule 5; or
(d) a personal pension scheme, occupational pension scheme or a payment made by the Board of the Pension Protection Fund; or
(e) any sum to which section 46(2)(a) of Schedule 4 (capital to be disregarded) applies which is administered in the way referred to in section 46(1)(a); or
(f) any sum to which section 47(a) of Schedule 4 refers; or
(g) child tax credit; or
(h) working tax credit,

any capital which would become available to the applicant upon application being made, but which has not been acquired by him, shall be treated as possessed by him but only from the date on which it could be expected to be acquired were an application made.

36.3 Any payment of capital, other than a payment of capital specified in section 36.4, made

(a) to a third party in respect of a single applicant or a member of the family (but not a member of the third party's family) shall, where that payment is a payment of an occupational pension, a pension or other periodical payment made under a personal pension scheme or a payment made by the Board of the Pension Protection Fund, be treated as possessed by that single applicant or, as the case may be, by that member;
(b) to a third party in respect of a single applicant or in respect of a member of the family (but not a member of the third party's family) shall, where it is not a payment referred to in sub-paragraph (a), be treated as possessed by that single applicant or by that member to the extent that it is used for the food, ordinary clothing or footwear, household fuel or rent of that single applicant or, as the case may be, of any member of that family or is used for any council tax or water charges for which that applicant or member is liable;
(c) to a single applicant or a member of the family in respect of a third party (but not in respect of another member of that family) shall be treated as possessed by that single applicant or, as the case may be, that member of the family to the extent that it is kept or used by him or used by or on behalf of any member of the family.

36.4 Section 36.3 shall not apply in respect of payment of capital made
(a) under or by any of the Trusts, the Fund, the Eileen Trust, MFET Limited, the Independent Living Fund (2006), the Skipton Fund, the Caxton Foundation to the London Bombing Relief Charitable Fund;
(b) pursuant to section 2 of the 1973 Act in respect of a person's participation

(i) in an employment programme specified in regulation 75(1)(a)(ii) of the Jobseeker's Allowance Regulations;
(ii) in a training scheme specified in regulation 75(1)(b)(ii) of those Regulations;

(iii) in the Intense Activity Period ulation 75(1)(a)(iv) of those Regulations;
(iv) in a qualifying course within the meaning specified in regulation 17A(7) of those Regulations; or
(v) in the Flexible New Deal specified in regulation 75(1)(a)(v) of those Regulations;

(bb) in respect of a person's participation in the Mandatory Work Activity Scheme; Enterprise Scheme

(bc) in respect of an applicant's participation in the Employment, Skills and Enterprise Scheme;

(d) under an occupational pension scheme, in respect of a pension or other periodical payment made under a personal pension scheme or a payment made by the Board of the Pension Protection Fund where-

(i) a bankruptcy order has been made in respect of the person in respect of whom the payment has been made or, in Scotland, the estate of that person is subject to sequestration or a judicial factor has been appointed on that person's estate under section 41 of the Solicitors (Scotland) Act 1980;
(ii) the payment is made to the trustee in bankruptcy or any other person acting on behalf of the creditors; and
(iii) the person referred to in (i) and any member of his family does not possess, or is not treated as possessing, any other income apart from that payment.

36.5 Where an applicant stands in relation to a company in a position analogous to that of a sole owner or partner in the business of that company, he may be treated as if he were such sole owner or partner and in such case

a. the value of his holding in that company shall, notwithstanding section 31 (calculation of capital) be disregarded; and
b. he shall, subject to section 36.6, be treated as possessing an amount of capital equal to the value or, as the case may be, his share of the value of the capital of that company and the foregoing provisions of this Section shall apply for the purposes of calculating that amount as if it were actual capital which he does possess.

36.6 For so long as the applicant undertakes activities in the course of the business of the company, the amount which he is treated as possessing under section 36.5 shall be disregarded.

36.7 Where an applicant is treated as possessing capital under any of sections 36.1 to 36.2 the foregoing provisions of this Section shall apply for the purposes of calculating its amount as if it were actual capital which he does possess.

37.0 Diminishing notional capital rule

37.1 Where an applicant is treated as possessing capital under section 36.1 (notional capital), the amount which he is treated as possessing;

a. in the case of a week that is subsequent to
(i) the relevant week in respect of which the conditions set out in section 37.2 are satisfied; or
(ii) a week which follows that relevant week and which satisfies those conditions, shall be reduced by an amount determined under section 37.3;
b. in the case of a week in respect of which section 37.1(a) does not apply but where
(i) that week is a week subsequent to the relevant week; and
(ii) that relevant week is a week in which the condition in section 37.4 is satisfied, shall be reduced by the amount determined under section 37.4

37.2 This paragraph applies to a reduction week or part-week where the applicant satisfies the condition that
a. he is in receipt of council tax support; and
b. but for section 36.1, he would have received an additional amount of council tax support in that week.

37.3 In a case to which section 37.2 applies the reduction for the purposes of section 37.1(a) shall be equal to the aggregate of

a. the additional amount to which sub-section 37.2(b) refers;
b. where the applicant has also claimed housing benefit, the amount of any housing benefit or any additional amount of that benefit to which he would have been entitled in respect of the whole or part of the reduction week to which section 37.2 refers but for the application of regulation 49(1) of the Housing Benefit Regulations 2006 (notional capital);
c. where the applicant has also claimed income support, the amount of income support to which he would have been entitled in respect of the whole or part of the reduction week to which section 37.2 refers but for the application of regulation 51(1) of the Income Support Regulations (notional capital);
d. where the applicant has also claimed a jobseeker's allowance, the amount of an income-based jobseeker's allowance to which he would have been entitled in respect of the whole or part of the reduction week to which section 37.2 refers but for the application of regulation 113 of the Jobseeker's Allowance Regulations 1996 (notional capital) and
e. where the applicant has also claimed an employment and support allowance, the amount of an income-related employment and support allowance to which he would have been entitled in respect of the whole or part of reduction week to which section 37.2 refers but for the application of regulation 115 of the Employment and Support Allowance Regulations 2008 (notional capital).

37.4 Subject to section 37.5, for the purposes of section 37.1(b) the condition is that the applicant would have been entitled to council tax support in the relevant week but for section 36.1, and in such a case the amount of the reduction shall be equal to the aggregate of

a. the amount of council tax support to which the applicant would have been entitled in the relevant week and for the purposes of this sub-paragraph is the amount in respect of a part-week, that amount shall be determined by dividing the amount of council tax support to which he would have been so entitled by the number equal to the number of days in the part-week and multiplying the quotient so obtained by 7;
b. if the applicant would, but for regulation 49(1) of the Housing Benefit Regulations, have been entitled to housing benefit or to an additional amount of housing benefit in respect of the reduction week which includes the last day of the relevant week, the amount which is equal to-
   (i) in a case where no housing benefit is payable, the amount to which he would have been entitled; or
   (ii) in any other case, the amount equal to the additional amount of housing benefit to which he would have been entitled,

   and, for the purposes of this sub-paragraph, if the amount is in respect of a part-week, that amount shall be determined by dividing the amount of housing benefit to which he would have been entitled by the number equal to that number of days in the part-week and multiplying the quotient so obtained by 7;
a. if the applicant would, but for regulation 51(1) of the Income Support Regulations, have been entitled to income support in respect of the reduction week, within the meaning of regulation 2(1) of those Regulations, which includes the last day of the relevant week, the amount to which he would have been entitled and, for the purposes of this sub-paragraph, if the amount is in respect of a part-week, that amount shall be determined by dividing the amount of the income support to which he would have been so entitled by the number equal to the number of days in the part-week and multiplying the quotient so obtained by 7;
b. if the applicant would, but for regulation 113 of the Jobseeker's Allowance Regulations 1996, have been entitled to an income-based jobseeker's allowance in respect of the reduction week, within the meaning of this scheme, which includes the last day of the relevant week, the amount to which he would have been entitled and, for the purposes of this sub-paragraph,
   if the amount is in respect of a part-week, that amount shall be determined by dividing the amount of the income-based jobseeker's allowance to which he would have been so entitled by the number equal to the number of days in the part-week and multiplying the quotient so obtained by 7; and

c. if the applicant would, but for reg the Employment and Support Allowance Regulations 2008, have been entitled to an income-related employment and support allowance in respect of the reduction week, within the meaning of regulation 2(1) of those Regulations (interpretation), which includes the last day of the relevant week, the amount to which he would have been entitled and, for the purposes of this sub-paragraph, if the amount is in respect of a part-week, that amount must be determined by dividing the amount of the income-related employment and support allowance to which he would have been so entitled by the number equal to the number of days in that part-week and multiplying the quotient so obtained by 7;

37.5 The amount determined under section 37.4 shall be re-determined under that paragraph if the applicant makes a further claim for council tax support and the conditions in section 37.6 are satisfied, and in such a case-

a. sub-paragraphs (a) to (d) of section 37.4 shall apply as if for the words 'relevant week' there were substituted the words 'relevant subsequent week'; and
b. subject to section 37.7, the amount as re-determined shall have effect from the first week following the relevant subsequent week in question.

37.6 The conditions are that
a. a further claim is made 26 or more weeks after
   (i) the date on which the applicant made a claim for council tax support in respect of which he was first treated as possessing the capital in question under section 36.1;
   (ii) in a case where there has been at least one re-determination in accordance with section 37.5, the date on which he last made a claim for council tax support which resulted in the weekly amount being re-determined, or
   (iii) the date on which he last ceased to be entitled to council tax support, whichever last occurred; and
b. the applicant would have been entitled to council tax support but for section 36.1

37.7 The amount as re-determined pursuant to section 37.5 shall not have effect if it is less than the amount which applied in that case immediately before the re-determination and in such a case the higher amount shall continue to have effect.

37.8 For the purposes of this section
a. 'part-week'

   (i) in section 37.4(a) means a period of less than a week for which council tax support is allowed;
   (ii) in section 37.4(b) means a period of less than a week for which housing benefit is payable;
   (iii) in section 37.4(c), (d) and (e) means-
aa. a period of less than a week which is the whole period for which income support, an income-related employment and support allowance or, as the case may be, an income-based jobseeker's allowance is payable; and
bb. any other period of less than a week for which it is payable;
b. 'relevant week' means the reduction week or part-week in which the capital in question of which the applicant has deprived himself within the meaning of section 39.1
   (i) was first taken into account for the purposes of determining his entitlement to council tax reduction; or
   (ii) was taken into account on a subsequent occasion for the purpose of determining or re-determining his entitlement to the council tax support on that subsequent occasion and that determination or re- determination resulted in his beginning to receive, or ceasing to receive, council tax reduction;
   and where more than one reduction week is identified by reference to heads (i) and (ii) of this sub-paragraph the later or latest such reduction week or, as the case may be, the later or latest such part-week;

c. 'relevant subsequent week' means the week or part-week which includes the day on which the further claim or, if more than one further claim has been made, the last such claim was made.

38.0 Capital jointly held

38.1 Except where an applicant possesses capital which is disregarded under section 36(5) (notional capital) where an applicant and one or more persons are beneficially entitled in possession to any capital asset they shall be treated, in the absence of evidence to the contrary, as if each of them were entitled in possession to the whole beneficial interest therein in an equal share and the foregoing provisions of this Section shall apply for the purposes of calculating the amount of capital which the applicant is treated as possessing as if it were actual capital which the applicant does possess

39.0 Calculation of tariff income from capital

39.1 No tariff income will be applied.

Sections 40 - 53

Definition and the treatment of students for council tax support purposes

40.0 Student related definitions

40.1 In this scheme the following definitions apply;

'academic year' means the period of twelve months beginning on 1 January, 1 April, 1 July or 1 September according to whether the course in question begins in the winter, the spring, the summer or the autumn respectively but if students are required to begin attending the course during August or September and to continue attending through the autumn, the academic year of the course shall be considered to begin in the autumn rather than the summer;

'access funds' means;

a. grants made under section 68 of the Further and Higher Education Act 1992 for the purpose of providing funds on a discretionary basis to be paid to students;
b. grants made under section 73(a) and (c) and 74(1) of the Education (Scotland) Act 1980;
c. grants made under Article 30 of the Education and Libraries (Northern Ireland) Order 1993 or grants, loans or other payments made under Article 5 of the Further Education (Northern Ireland) Order 1997 in each case being grants, or grants, loans or other payments as the case may be, for the purpose of assisting students in financial difficulties;
d. discretionary payments, known as "learner support funds" which are made available to students in further education by institutions out of funds provided by the Secretary of State under section 14 of the Education Act 2002 or the Chief Executive of Skills Funding under sections 100 and 101 of the Apprenticeships, Skills, Children and Learning Act 2009; or
e. Financial Contingency Funds made available by the Welsh Ministers;

'college of further education' means a college of further education within the meaning of Part 1 of the Further and Higher Education (Scotland) Act 1992;

'contribution' means;

a. any contribution in respect of the income of a student or any person which the Secretary of State, the Scottish Ministers or an education authority takes into account in ascertaining the amount of a student's grant or student loan; or
b. any sums, which in determining the amount of a student's allowance or bursary in Scotland under the Education (Scotland) Act 1980, the Scottish Ministers or education authority takes

into account being sums which the authority or education authority consider that it is reasonable for the following person to contribute towards the holder's expenses;

(i) the holder of the allowance or bursary;
(ii) the holder's parents;
(iii) the holders parent's spouse, civil partner or a person ordinarily living with the holder's parent as if he or she were the spouse or civil partner of that parent; or
(iii) the holder's spouse or civil partner;

'course of study' means any course of study, whether or not it is a sandwich course and whether or not a grant is made for attending or undertaking it;

'covenant income' means the gross income payable to a full-time student under a Deed of Covenant by his parent;

'education authority' means a government department, a local education authority as defined in section 12 of the Education Act 1996 (interpretation), a local education authority as defined in section 123 of the Local Government (Scotland) Act 1973, an education and library board established under Article 3 of the Education and Libraries (Northern Ireland) Order 1986, any body which is a research council for the purposes of the Science and Technology Act 1965 or any analogous government department, authority, board or body of the Channel Island, Isle of Man or any other country outside Great Britain;

'full-time course of study' means a full time course of study which;

a. is not funded in whole or in part by the Secretary of State under section 14 of the Education Act 2002, the Chief Executive of Skills Funding or by the Welsh Ministers or a full-time course of study which is not funded in whole or in part by the Scottish Ministers at a college of further education or a full-time course of study which is a course of higher education and is funded in whole or in part by the Scottish Ministers;
b. is funded in whole or in part by the Secretary of State under section 14 of the Education Act 2002, the Chief Executive of Skills Funding or by the Welsh Ministers if it involves more than 16 guided learning hours per week for the student in question, according to the number of guided learning hours per week for that student set out-
    (i) in the case of a course funded by the Secretary of State under section 14 of the Education Act 2002 or the Chief Executive of Skills Funding, in the student's learning agreement signed on behalf of the establishment which is funded by either of those persons for the delivery of that course; or
    (ii) in the case of a course funded by the Welsh Ministers, in a document signed on behalf of the establishment which is funded by that Council for the delivery of that course; or
c. is not higher education and is funded in whole or in part by the Scottish Ministers at a college of further education and involves-
    (i) more than 16 hours per week of classroom-based or workshop-based programmed learning under the direct guidance of teaching staff according to the number of hours set out in a document signed on behalf of the college; or
    (ii) 16 hours or less per week of classroom-based or workshop-based programmed learning under the direct guidance of teaching staff and additional hours using structured learning packages supported by the teaching staff where the combined total of hours exceeds 21 hours per week, according to the number of hours set out in a document signed on behalf of the college;

'full-time student' means a person attending or undertaking a full-time course of study and includes a student on a sandwich course;

'grant' (except in the definition of 'access funds') means any kind of educational grant or award and includes any scholarship, studentship, exhibition allowance or bursary but does not include a payment from access funds or any payment to which paragraph 12 of Schedule 4 or paragraph 53 of Schedule 5 applies;

'grant income' means

(a) any income by way of a grant;
(b) any contribution whether or not it is paid;

'higher education' means higher education within the meaning of Part 2 of the Further and Higher Education (Scotland) Act 1992; 'last day of the course' means;

a. in the case of a qualifying course, the date on which the last day of that course falls or the date on which the final examination relating to that course is completed, whichever is later;
b. in any other case, the date on which the last day of the final academic term falls in respect of the course in which the student is enrolled;

'**period of study'** means-

a. in the case of a course of study for one year or less, the period beginning with the start of the course and ending with the last day of the course;
b. in the case of a course of study for more than one year, in the first or, as the case may be, any subsequent year of the course, other than the final year of the course, the period beginning with the start of the course or, as the case may be, the year's start and ending with either-
    (i) the day before the start of the next year of the course in a case where the student's grant or loan is assessed at a rate appropriate to his studying throughout the year, or, if he does not have a grant or loan, where a loan would have been assessed at such a rate had he had one; or
    (ii) in any other case, the day before the start of the normal summer vacation appropriate to his course;
    d. in the final year of a course of study of more than one year, the period beginning with that year's start and ending with the last day of the course;

'periods of experience' means periods of work experience which form part of a sandwich course;

'qualifying course' means a qualifying course as defined for the purposes of Parts 2 and 4 of the Jobseeker's Allowance Regulations;

'modular course' means a course of study which consists of two or more modules, the successful completion of a specified number of which is required before a person is considered by the educational establishment to have completed the course.

'sandwich course' has the meaning prescribed in regulation 2(9) of the Education (Student Support) Regulations 2008, regulation 4(2) of the Education (Student Loans), (Scotland) Regulations 2007 or regulations 2(8) of the Education (Student Support) Regulations (Northern Ireland) 2007, as the case may be;

'standard maintenance grant' means-

a. except where paragraph (b) or (c) applies; in the case of a student attending or undertaking a course of study at the University of London or an establishment within the area comprising the City of London and Metropolitan Police District, the amount specified for the time being in paragraph 2(2)(a) of Schedule 2 to the Education (Mandatory Awards) Regulations 2003 ('the 2003 Regulations') for such a student;
b. except where paragraph (c) applies, in the case of a student residing at his parent's home, the amount specified in paragraph 3 thereof;
c. in the case of a student receiving an allowance or bursary under the Education (Scotland) Act 1980, the amount of money specified as 'standard maintenance allowance' for the relevant year appropriate for the student set out in the Student Support in Scotland Guide issued by the student Awards Agency for Scotland, or its nearest equivalent in the case of a bursary provided by a college of further education or a local education authority;
d. in any other case, the amount specified in paragraph 2(2) of Schedule 2 to the 2003 Regulations other than in sub-paragraph (a) or (b) thereof;

'student' means a person, other than a person in receipt of a training allowance, who is attending or undertaking-

a. a course of study at an educational establishment; or
b. a qualifying course;

'student loan' means a loan towards a student's maintenance pursuant to any regulations made under section 22 of the Teaching and Higher Education Act 1998, section 73 of the Education (Scotland) Act 1980 or Article 3 of the Education (Student Support) (Northern Ireland) Order 1998 and shall include, in Scotland, a young student's bursary paid under regulation 4(1)(c) of the Student's Allowances (Scotland) Regulations 2007

40.2 For the purposes of the definition of 'full-time student', a person shall be regarded as attending or, as the case may be, undertaking a full-time course of study or as being on a sandwich course

a. in the case of person attending or undertaking a part of a modular course which would be a full-time course of study for the purposes of this Part, for the period beginning on the day on which that part of the course starts and ending;
   (i) on the last day on which he is registered with the educational establishment as attending or undertaking that part as a full-time course of study; or
   (ii) on such earlier date (if any) as he finally abandons the course or is dismissed from it;
b. in any other case, throughout the period beginning on the date on which he starts attending or undertaking the course and ending on the last day of the course or on such earlier date (if any) as he finally abandons it or is dismissed from it.

40.3 For the purposes of sub-paragraph (a) of section 40.2, the period referred to in that sub-paragraph shall include;

a. where a person has failed examinations or has failed to successfully complete a module relating to a period when he was attending or undertaking a part of the course as a full-time course of study, any period in respect of which he attends or undertakes the course for the purpose of retaking those examinations or that module;
b. any period of vacation within the period specified in that paragraph or immediately following that period except where the person has registered with the educational establishment to attend or undertake the final module in the course and the vacation immediately follows the last day on which he is required to attend or undertake the course.

41.0 Treatment of students

41.1 The following sections relate to students who claim council tax support

42.0 Students who are excluded from entitlement to council tax support

42.1 Students (except those specified in section 42.3) are not able to claim council tax support under the Council's support scheme.

42.2 To be eligible for support, the student must be liable for council tax under Section 6 of the Local Government Finance Act 1992 and they must not be deemed to be a full-time student or a persons from abroad within the meaning of section 7 of this scheme (persons from abroad).

42.3 Section 42.2 shall not apply to a student

(a) who is a person on income support, an income-based jobseeker's allowance or an income-related employment and support allowance;
(b) who is a lone parent;
(c) whose applicable amount would, but for this section, include the disability premium or severe disability premium;
(d) whose applicable amount would include the disability premium but for his being treated as capable of work by virtue of a determination made in accordance with regulations made under section 171E of the Act;
(e) who is, or is treated as, incapable of work and has been so incapable, or has been so treated as incapable, of work in accordance with the provisions of, and regulations made under, Part 12A of the Act (incapacity for work) for a continuous period of not less than 196 days; and

for this purpose any two or more separated by a break of not more than 56 days shall be treated as one continuous period;

(f) who has, or is treated as having, limited capability for work and has had, or been treated as having, limited capability for work in accordance with the Employment and Support Allowance Regulations for a continuous period of not less than 196 days, and for this purpose any two or more separate periods separated by a break of not more than 84 days must be treated as one continuous period.

(g) who has a partner who is also a full-time student, if he or that partner is treated as responsible for a child or young person;

(h) who is a single applicant with whom a child is placed by a local authority or voluntary organisation within the meaning of the Children Act 1989, or, in Scotland, boarded out within the meaning of the Social Work (Scotland) Act 1968;

(i) who is;
  (i) aged under 21 and whose course of study is not a course of higher education, or
  (ii) a qualifying young person or child within the meaning of section 142 of the Act (child and qualifying young person);

(ii) in respect of whom
  (i) a supplementary requirement has been determined under paragraph 9 of Part 2 of Schedule 2 to the Education (Mandatory Awards) Regulations 2003;
  (ii) an allowance, or as the case may be, bursary has been granted which includes a sum under paragraph (1)(d) or regulation 4 of the Students' Allowances (Scotland) Regulations 1999 or, as the case may be, under paragraph (1)(d) of regulation 4 of the Education Authority (Bursaries) (Scotland) Regulations 1995, in respect of expenses incurred;
  (iii) a payment has been made under section 2 of the Education Act 1962 or under or by virtue of regulations made under the Teaching and Higher Education Act 1998;
  (iv) a grant has been made under regulation 13 of the Education (Student Support) Regulations 2005 or under regulation 13 of the Education (Student Support) Regulations (Northern Ireland) 2000; or
  (v) a supplementary requirement has been determined under paragraph 9 of Schedule 6 to the Students Awards Regulations (Northern Ireland) 1999 or a payment has been made under Article 50(3) of the Education and Libraries (Northern Ireland) Order 1986,

  on account of his disability by reason of deafness.

For the purposes of section 42.3(h)(i) the student must have begun, or been enrolled or accepted onto the course before attaining the age of 19

42.4 For the purposes of section 42.3, once section 42.3(e) applies to a full-time student, if he then ceases, for a period of 56 days or less, to be incapable, or to be treated as incapable, of work, that paragraph shall, on his again becoming so incapable, or so treated as incapable, of work at the end of that period, immediately thereafter apply to him for so long as he remains incapable or is treated as remaining incapable, of work.

42.5 In section 42.3(h) the reference to a course of higher education is a reference to a course of any description mentioned in Schedule 6 to the Education Reform Act 1988.

42.6 A full-time student to whom sub-paragraph (i) of section 42.3 applies, shall be treated as satisfying that sub-paragraph from the date on which he made a request for the supplementary requirement, allowance, bursary or payment as the case may be.

42.7 Section 42.2 shall not apply to a full-time student for the period specified in section 42.8 if;

(a) at any time during an academic year, with the consent of the relevant educational establishment, he ceases to attend or undertake a course because he is;
  (i) engaged in caring for another person; or
  (ii) ill;

(b) he has subsequently ceased to be engaged in engaging in caring for that person or, as the case may be, he has subsequently recovered from that illness; and

(c) he is not eligible for a grant or a respect of the period specified in section 42.8.

42.8 The period specified for the purposes of section 42.7 is the period, not exceeding one year, beginning on the day on which he ceased to be engaged in caring for that person or, as the case may be, the day on which he recovered from that illness and ending on the day before;

(a) the day on which he resumes attending or undertaking the course; or
(b) the day from which the relevant educational establishment has agreed that he may resume attending or undertaking the course,

which shall first occur.

43.0 Calculation of grant income

43.1 The amount of a student's grant income to be taken into account shall, subject to sections 43.2 and 43.3, be the whole of his grant income.

43.2 There shall be excluded from a student's grant income any payment;

(a) intended to meet tuition fees or examination fees;
(b) in respect of the student's disability;
(c) intended to meet additional expenditure connected with term time residential study away from the student's educational establishment;
(d) on account of the student maintaining a home at a place other than that at which he resides during his course;
(e) on account of any other person but only if that person is residing outside of the United Kingdom and there is no applicable amount in respect of him;
(f) intended to meet the cost of books and equipment;
(g) intended to meet travel expenses incurred as a result of his attendance on the course;
(h) intended for the child care costs of a child dependant;
(i) of higher education bursary for care leavers made under Part 111 of the Children Act 1989.

43.3 Where a student does not have a student loan and is not treated as possessing such a loan, there shall be excluded from the student's grant income;

(a) the sum of £303 per academic year in respect of travel costs; and
(b) the sum of £390 per academic year towards the costs of books and equipment, whether or not any such costs are incurred.

The above figures will be increased annually in line with the Housing Benefit Regulations 2006 (as amended).

43.4 There shall also be excluded from a student's grant income the grant for dependants known as the parents' learning allowance paid pursuant to regulations made under Article 3 of the Education (Student Support) (Northern Ireland) Order 1998 or section 22 of the Teaching and Higher Education Act 1998.

43.5 Subject to sections 43.6 and 43.7, a student's grant income shall be apportioned;

(a) subject to section 43.8, in a case where it is attributable to the period of study, equally between the weeks in that period beginning with the reduction week, the first day of which coincides with, or immediately follows the first day of the period of study and ending with the reduction week, the last day of which coincides with, or immediately precedes, the last day of the period of study;
(b) in any other case, equally between the weeks in the period beginning with the reduction week, the first day of which coincides with, or immediately follows, the first day of the period for which it is payable and ending with the reduction week, the last day of which coincides with, or immediately precedes, the last day of the period for which it is payable.

43.6 Any grant in respect of dependants paid under section 63(6) of the Health Services and Public Health Act 1968 (grants in respect of the provision of instruction to officers of hospital authorities) and any amount intended for the maintenance of dependants under Part 3 of Schedule 2 to the Education (Mandatory Awards) Regulations 2004 shall be apportioned equally over the period of 52 weeks or, if there are 53 reduction weeks (including part-weeks) in the year, 53.

43.7 In a case where a student is in receipt of a student loan or where he could have acquired a student loan by taking reasonable steps but had not done so, any amount intended for the maintenance of dependants to which neither section 43.6 nor section 47 (other amounts to be disregarded) apply, shall be apportioned over the same period as the student's loan is apportioned or, as the case may be, would have been apportioned.

43.8 In the case of a student on a sandwich course, any periods of experience within the period of study shall be excluded and the student's grant income shall be apportioned equally between the weeks in the period beginning with the reduction week, the first day of which immediately follows the last day of the period of experience and ending with the reduction week, the last day of which coincides with, or immediately precedes, the last day of the period of study.

44.0 Calculation of covenant income where a contribution is assessed

44.1 Where a student is in receipt of income by way of a grant during a period of study and a contribution has been assessed, the amount of his covenant income to be taken into account for that period and any summer vacation immediately following shall be the whole amount of the covenant income less, subject to section 44.3, the amount of the contribution.

44.2 The weekly amount of the student's covenant shall be determined-

(a) by dividing the amount of income which falls to be taken into account under section 44.1 by 52 or 53, whichever is reasonable in the circumstances;

44.3 For the purposes of section 44.1, the contribution shall be treated as increased by the amount (if any) by which the amount excluded under section 43.2(g) (calculation of grant income) falls short of the amount specified in section 7(2) of Schedule 2 to the Education (Mandatory Awards) Regulations 2003 (travel expenditure).

45.0 Covenant income where no grant income or no contribution is assessed

45.1 Where a student is not in receipt of income by way of a grant the amount of his covenant income shall be calculated as follows;

(a) any sums intended for any expenditure specified in section 43.2 (a) to (e) (calculation of grant income) necessary as a result of his attendance on the course shall be disregarded;
(b) any covenant income, up to the amount of the standard maintenance grant, which is not so disregarded, shall be apportioned equally between the weeks of the period of study;
(c) there shall be disregarded from the amount so apportioned the amount which would have been disregarded under section 43.2(f) and 43.3 (calculation of grant income) had the student been in receipt of the standard maintenance grant; and
(d) the balance, if any, shall be divided by 52 or 53 whichever is reasonable in the circumstances and treated as weekly income.

45.2 Where a student is in receipt of income by way of a grant and no contribution has been assessed, the amount of his covenanted income shall be calculated in accordance with sub-paragraphs (a) to (d) of section 45.1, except that;

(a) the value of the standard maintenance grant shall be abated by the amount of such grant income less an amount equal to the amount of any sums disregarded under section 43.2 (a) to (e); and
(b) the amount to be disregarded under section 45.1(c) shall be abated by an amount equal to the amount of any sums disregarded under section 43.2(f) and (g) and 43.3.

46.0 Student Covenant Income and Grant Income – non disregard

46.1 No part of a student's covenant income or grant income shall be disregarded under paragraph 15 of Schedule 2 to this scheme.

47.0 Other amounts to be disregarded

47.1 For the purposes of ascertaining income other than grant income, covenant income and loans treated as income in accordance with section 51, any amounts intended for any expenditure specified in section 43.2 (calculation of grant income), necessary as a result of his attendance on the course shall be disregarded but only if, and to the extent that, the necessary expenditure exceeds or is likely to exceed the amount of the sums disregarded under sections 43.2 or 43.3, 44.3, 45.1(a) or (c) or 48.5 (calculation of grant income, covenant income and treatment of student loans) on like expenditure.

48.0 Treatment of student loans

48.1 A student loan shall be treated as income.

48.2 In calculating the weekly amount of the loan to be taken into account as income

(a) in respect of a course that is of a single academic year's duration or less, a loan which is payable in respect of that period shall be apportioned equally between the weeks in the period beginning with;

(i) except in a case where (ii) applies, the reduction week, the first day of which coincides with, or immediately follows, the first day of the single academic year;

(ii) where the student is required to start attending the course in August or where the course is less than an academic year's duration, the reduction week, the first day of which coincides with, or immediately follows, the first day of the course, and ending with the reduction week, the last day of which coincides with, or immediately precedes with, the last day of the course;

(b) in respect of an academic year of a course which starts other than on 1 September, a loan which is payable in respect of that academic year shall be apportioned equally between the weeks in the period beginning with the reduction week, the first day of which coincides with, or immediately follows, the first day of that academic year and ending with the reduction week, the last day of which coincides with, or immediately precedes, the last day of that academic year but excluding any reduction weeks falling entirely within the quarter during which, in the opinion of the Secretary of State, the longest of any vacation is taken and for the purposes of this sub-paragraph, 'quarter' shall have the same meaning as for the purposes of the Education (Student Support) Regulations 2005;

(c) in respect of the final academic year of a course (not being a course of a single year's duration), a loan which is payable in respect of that final academic year shall be apportioned equally between the weeks in the period beginning with;

(i) except in a case where (ii) applies, the reduction week, the first day of which coincides with, or immediately follows, the first day of that academic year;

(ii) where the final academic year starts on 1 September, the reduction week, the first day of which coincides with, or immediately follows, the earlier of 1 September or the first day of the autumn term,

and ending with the reduction week, the last day of which coincides with, or immediately precedes, the last day of the course;

(d) in any other case, the loan shall be apportioned equally between the weeks in the period beginning with the earlier of;

(i) the first day of the first reduction week in September; or

(ii) the reduction week, the first day of which coincides with, or immediately follows, the first day of the autumn term,

and ending with the reduction week, the last day of which coincides with, or immediately precedes, the last day of the course;

and, in all cases, from the weekly amount so apportioned there shall be disregarded £10.

48.3 A student shall be treated as possessing a student loan in respect of an academic year where;

(a) a student loan has been made to him in respect of that year; or
(b) he could acquire such a loan in respect of that year by taking reasonable steps to do so.

48.4 Where a student is treated as possessing a student loan under section 48.3, the amount of the student loan to be taken into account as income shall be, subject to section 48.5

(a) in the case of a student to whom a student loan is made in respect of an academic year, a sum equal to
    (i) the maximum student loan he is able to acquire in respect of that year by taking reasonable steps to do so; and
    (ii) any contribution whether or not it has been paid to him;
(b) in the case of a student to whom a student loan is not made in respect of an academic year, the maximum student loan that would be made to the student if;
    (i) he took all reasonable steps to obtain the maximum student loan he is able to acquire in respect of that year; and
    (ii) no deduction in that loan was made by virtue of the application of a means test.

48.5 There shall be deducted from the amount of income taken into account under section 48.4
(a) the sum of £303 per academic year in respect of travel costs; and
(b) the sum of £390 per academic year towards the cost of books and equipment, whether or not any such costs are incurred.

The above figures will be increased annually in line with the Housing Benefit Regulations 2006 (as amended).

49.0 Treatment of fee loans and treatment of payments from access funds

49.1 A loan for fees, known as a fee loan or a fee contribution loan, made pursuant to regulations made under Article 3 of the Education (Student Support) (Northern Ireland) Order 1998, section 22 of the Teaching and Higher Education Act 1998 or section 73(f) of the Education (Scotland) Act 1980, shall be disregarded income.

49.2 This paragraph applies to payments from access funds that are not payments to which section 52.2 or 52.3 (income treated as capital) applies.

49.3 A payment from access funds, other than a payment to which section 49.4 applies, shall be disregarded as income.

49.4 Subject to section 49.5 of this section and section 35 of Schedule 2,

(a) any payments from access funds which are intended and used for an item of food, ordinary clothing or footwear, household fuel, or rent of a single applicant or, as the case may be, of the applicant or any other member of his family and
(b) any payments from access funds which are used for any council tax or water charges for which that applicant or member is liable, shall be disregarded as income to the extent of £20 per week.

49.5 Where a payment from access funds is made-

(a) on or after 1 September or the first day of the course, whichever first occurs, but before receipt of any student loan in respect of that year and that payment is intended for the purpose of bridging the period until receipt of the student loan; or
(b) before the first day of the course to a person in anticipation of that person becoming a student, that payment shall be disregarded as income.

50.0 Disregard of contribution

50.1 Where the applicant or his partner is a student and for the purposes of assessing a contribution to the student's grant or student loan, the partner's income has been taken into account, an amount equal to that contribution shall be disregarded for the purposes of assessing that other partner's income.

51.0 Further disregards of student's income

51.1 Where any part of a student's income has already been taken into account for the purpose of assessing his entitlement to a grant or student loan, the amount taken into account shall be disregarded in assessing that student's income.

52.0 Income treated as capital

52.1 Any amount by way of a refund of tax deducted from a student's covenant income shall be treated as capital.

52.2 Any amount paid from access funds as a single lump sum shall be treated as capital.

52.3 An amount paid from access fund as a single lump sum which is intended and used for an item other than food, ordinary clothing or footwear, household fuel or rent, or which is used for an item other than any council tax or water charges for which that applicant or member is liable, shall be disregarded as capital but only for a period of 52 weeks from the date of payment.

53.0 Disregard of changes occurring during summer vacation

53.1 In calculating a student's income the authority shall disregard any change in the standard maintenance grant, occurring in the recognised summer vacation appropriate to the student's course, if that vacation does not form part of his period of study from the date on which the change occurred to the end of that vacation.

Sections 54 - 65

The calculation and amount of council tax support

54.0 Maximum council tax support

54.1 Subject to sections 54.2 to 54.4, the amount of a person's maximum council tax support in respect of a day for which he is liable to pay council tax, shall be 100 per cent, of the amount A divided by B where;

(a) A is the amount set by the appropriate authority as the council tax for the relevant financial year in respect of the dwelling in which he is a resident and for which he is liable, subject to any discount which may be appropriate to that dwelling under the 1992 Act. The annual liability will also be restricted to a council tax band E if the applicant lives in a property that has either a council tax band F, G or H.
(b) B is the number of days in that financial year, less any deductions in respect of non-dependants which fall to be made under section 55 (non-dependant deductions).

54.2 In calculating a person's maximum council tax support any reduction in the amount that person is liable to pay in respect of council tax, which is made in consequence of any enactment in, or made under, the 1992 Act, shall be taken into account.

54.3 Subject to section 54.4, where an applicant is jointly and severally liable for council tax in respect of a dwelling in which he is resident with one or more other persons but excepting any person so residing with the applicant who is a student to whom section 42.2 (students who are excluded from entitlement to council tax support) applies, in determining the maximum council tax support in his

case in accordance with section 54.1, shall be divided by the number of persons who are jointly and severally liable for that tax.

54.4 Where an applicant is jointly and severally liable for council tax in respect of a dwelling with only his partner, section 54.3 shall not apply in his case.

55.0 Non-dependant deductions

55.1 Subject to the following provisions of this section, the non-dependant deductions in respect of a day referred to in section 54 (maximum council tax support) shall be;

(a) in respect of a non-dependant aged 18 or over in remunerative work, £15.35 x 1/7;
(b) in respect of a non-dependant aged 18 or over to whom sub-paragraph (a) does not apply, £5.00 x 1/7.

55.2 In the case of a non-dependant aged 18 or over to whom section 58.1(a) applies, where it is shown to the appropriate authority that his normal gross weekly income is-

(a) less than £266.00, the deduction to be made under this paragraph shall be that specified in paragraph 58.1(b);
(b) not less than £266.00, but less than £463.00, the deduction to be made under this section shall be £10.20.
(c) not less than £463.00, but less than £577.00, the deduction to be made under this section shall be £12.80;

55.3 Only one deduction shall be made under this section in respect of a couple or, as the case may be, members of a polygamous marriage and, where, but for this paragraph, the amount that would fall to be deducted in respect of one member of a couple or polygamous marriage is higher than the amount (if any) that would fall to be deducted in respect of the other, or any other, member, the higher amount shall be deducted.

55.4 In applying the provisions of section 55.2 in the case of a couple or, as the case may be, a polygamous marriage, regard shall be had, for the purpose of that paragraph, to the couple's or, as the case may be, all members of the polygamous marriage's joint weekly gross income.

55.5 Where in respect of a day-

(a) a person is a resident in a dwelling but is not himself liable for council tax in respect of that dwelling and that day;
(b) other residents in that dwelling (the liable persons) have joint and several liability for council tax in respect of that dwelling and that day otherwise than by virtue of section 9 or 77 or 77A of the 1992 Act (liability of spouse and civil partners); and
(c) the person to whom sub-paragraph (a) refers is a non-dependant of two or more of the liable persons, the deduction in respect of that non-dependant shall be apportioned equally between those liable persons.

55.6 No deduction shall be made in respect of any non-dependants occupying an applicant's dwelling if the applicant or his partner is-

(a) blind or treated as blind; or
(b) receiving in respect of himself
  (i) attendance allowance, or would be receiving that allowance but for
    (aa) a suspension of benefit in accordance with regulations under section 113(2) of The Act; or
    (bb) an abatement as a result of hospitalisation; or
  (ii) the care component of the disability living allowance, or would be receiving that component but for
    (aa) a suspension of benefit in accordance with regulations under section 113(2) of The Act; or

(bb) an abatement as a result; or

(c) the daily living component of personal independence payment, or would be receiving that allowance but for a suspension of benefit in accordance with regulations under section 86 of the Welfare Reform Act 2012 (hospital in-patients);

(d) an AFIP, or would be receiving that payment but for a suspension of it in accordance with any terms of the armed reserve forces compensation scheme which allows for a suspension because a person is undergoing medical treatment in a hospital or similar institution.

55.7 No deduction shall be made in respect of a non-dependant if;

(a) although he resides with the applicant, it appears to the authority that his normal home is elsewhere; or

(b) he is in receipt of a training allowance paid in connection with a youth training established under section 2 of the 1973 Act or section 2 of the Enterprise and New Towns (Scotland) Act 1990; or

(c) he is a full-time student within the meaning of section 44.0 (Students); or

(d) he is not residing with the applicant because he has been a patient for a period of excess of 52 weeks, and for these purposes;

(i) 'patient' has the meaning given within this scheme, and

(ii) where a person has been a patient for two or more distinct periods separated by one or more intervals each not exceeding 28 days, he shall be treated as having been a patient continuously for a period equal in duration to the total of those distinct periods.

55.8 No deduction shall be made in respect of a non-dependant;

(a) who is on income support, state pension credit, an income-based jobseeker's allowance or an income-related employment

(b) and support allowance; or

(b) to whom Schedule 1 of the 1992 Act applies (persons disregarded for purposes of discount) but this sub-paragraph shall not apply to a non-dependant who is a student to whom paragraph 4 of that Schedule refers.

(c) who is entitled to an award of Universal Credit where the award is calculated on the basis that the person does not have any earned income. – earned income has the meaning given in regulation 52 of the Universal Credit regulations 2013(a)

55.9 In the application of section 55.2 there shall be disregarded from his weekly gross income-

(a) any attendance allowance, disability living allowance or personal independence payment or an AFIP received by him;

(b) any payment made under or by the Trusts, the Fund, the Eileen Trust, MFET Limited, the Skipton Fund, the Caxton Foundation or the Independent Living Fund (2006) which had his income fallen to be calculated under section 30 (calculation of income other than earnings) would have been disregarded under paragraph 24 of Schedule 4 (income in kind); and

(c) any payment which had his income fallen to be calculated under section 30 would have been disregarded under paragraph 36 of Schedule 4 (payments made under certain trusts and certain other payments).

56.0 Extended support

56.1 An applicant who is entitled to council tax support (by virtue of the general conditions of entitlement) shall be entitled to extended support where;

(a) the applicant or the applicant's partner was entitled to a qualifying income-related benefit;

(b) entitlement to a qualifying income-related benefit ceased because the applicant or the applicant's partner-

(i) commenced employment as an employed or self-employed earner;

(ii) increased their earnings from such employment; or

(iii) increased the number of hours worked in such employment;

(c) the applicant or the applicant's partner is entitled to and in receipt of a qualifying income-related benefit, jobseeker's allowance or a combination of those benefits for a continuous period of at least 26 weeks before the day on which the entitlement to a qualifying income-related benefit ceased.

56.2 For the purpose of section 56.1c, an applicant or an applicant's partner is to be treated as having been entitled to and in receipt of a qualifying income-related benefit or jobseeker's allowance during any period of less than five weeks in respect of which the applicant or the applicant's partner was not entitled to any of those benefits because the applicant or the applicant's partner was engaged in remunerative work as a consequence of their participation in an employment zone programme.

56.3 For the purpose of this section, where an applicant or an applicant's partner is entitled to and in receipt of joint-claim jobseeker's allowance they shall be treated as being entitled to and in receipt of jobseeker's allowance.

56.4 An applicant must be treated as entitled to council tax support by virtue of the general conditions of entitlement where-

(a) the applicant ceased to be entitled to council tax support because the applicant vacated the dwelling in which the applicant was resident;
(b) the day on which the applicant vacated the dwelling was either in the week in which entitlement to a qualifying income-related benefit ceased, or in the preceding week; and
(c) entitlement to the qualifying income-related benefit ceased in any of the circumstances listed in section 56.1(b).

56.5 This section shall not apply where, on the day before an applicant's entitlement to income support ceased, the regulation 6(5) of the Income Support Regulations (remunerative work: housing costs) applied to that applicant.

57.0 Duration of extended support period

57.1 Where an applicant is entitled to a support reduction, the extended support period starts on the first day of the support week immediately following the support week in which the applicant, or the applicant's partner, ceased to be entitled to a qualifying income-related benefit.

57.2 For the purpose of section 57.1, an applicant or an applicant's partner ceases to be entitled to a qualifying income-related benefit on the day immediately following the last day of entitlement to that benefit.

57.3 The extended support period ends;

(a) at the end of a period of four weeks; or
(b) on the date on which the applicant to whom the extended support is payable has no liability for council tax, if that occurs first.

58.0 Amount of extended support

58.1 For any week during the extended support period the amount of the extended support payable to an applicant shall be the higher of-

(a) the amount of council tax support to which the applicant was entitled under the general conditions of entitlement in the last support week before the applicant or the applicant's partner ceased to be entitled to a qualifying income-related benefit;
(b) the amount of council tax support to which the applicant would be entitled under the general conditions of entitlement for any support week during the extended support period, if section 56 (extended support) did not apply to the applicant; or
(c) the amount of council tax support to which the applicant's partner would be entitled under the general conditions of entitlement, if section 56 did not apply to the applicant.

58.2 Section 58.1 does not apply in the case of a mover.

58.3 Where an applicant is in receipt of extended support under this section and the applicant's partner makes a claim for council tax support, no amount of council tax support shall be payable by the appropriate authority during the extended support period.

59.0 Extended support – movers

59.1 This section applies;

(a) to a mover; and
(b) from the Monday following the day of the move.

59.2 The amount of the extended support payable from the Monday from which this section applies until the end of the extended support period shall be the amount of council tax support which was payable to the mover for the last support week before the mover, or the mover's partner, ceased to be entitled to a qualifying income-related benefit.

59.3 Where a mover's liability to pay council tax in respect of the new dwelling is to the second authority, the extended support may take the form of a payment from the appropriate authority to;
(a) the second authority; or
(b) the mover directly.

59.4 Where-
(a) a mover, or the mover's partner, makes a claim for council tax support to the second authority after the mover, or the mover's partner, ceased to be entitled to a qualifying income-related benefit; and
(b) the mover, or the mover's partner, is in receipt of extended support from the appropriate authority, the second authority shall reduce the weekly amount of council tax support that the mover, or the mover's partner, is entitled to by a sum equal to the amount of the extended support until the end of the extended support period.

60.0 Relationship between extended support and entitlement to council tax support under the general conditions of entitlement

60.1 Where an applicant's council tax support award would have ended when the applicant ceased to be entitled to a qualifying income-related benefit in the circumstances listed in section 56(b), that award will not cease until the end of the extended support period.

60.2 Changes of circumstances and increases for exceptional circumstances shall not apply to any extended support payable in accordance with section 58.1(a) or 59.2 (amount of extended support – movers).

61.0 Extended support (qualifying contributory benefits)

61.1 An applicant who is entitled to council tax support (by virtue of the general conditions of entitlement) shall be entitled to an extended support (qualifying contributory benefits) where;

(a) the applicant or the applicant's partner was entitled to a qualifying contributory benefit;
(b) entitlement to a qualifying contributory benefit ceased because the applicant or the applicant's partner;
  (i) commenced employment as an employed or self-employed earner;
  (ii) increased their earnings from such employment; or
  (iii) increased the number of hours worked in such employment, and that employment is or, as the case may be, increased earnings or increased number of hours are expected to last five weeks or more;
(c) the applicant or the applicant's partner had been entitled to and in receipt of a qualifying contributory benefit or a combination of qualifying contributory benefits for a continuous

period of at least 26 weeks before the entitlement to a qualifying contributory benefit ceased; and

(d) the applicant or the applicant's partner was not entitled to and not in receipt of a qualifying income-related benefit in the last support week in which the applicant, or the applicant's partner, was entitled to a qualifying contributory benefit.

61.2 An applicant must be treated as entitled to council tax support by virtue of the general conditions of entitlement where:

(a) the applicant ceased to be entitled to council tax support because the applicant vacated the dwelling in which the applicant was resident;
(b) the day on which the applicant vacated the dwelling was either in the week in which entitlement to a qualifying contributory benefit ceased, or in the preceding week; and
(c) entitlement to the qualifying contributory benefit ceased in any of the circumstances listed in section 61.1(b).

62.0 Duration of extended support period (qualifying contributory benefits)

62.1 Where an applicant is entitled to extended support (qualifying contributory benefits), the extended support period starts on the first day of the support week immediately following the support week in which the applicant, or the applicant's partner, ceased to be entitled to a qualifying contributory benefit.

62.2 For the purpose of section 62.1, an applicant or an applicant's partner ceases to be entitled to a qualifying contributory benefit on the day immediately following the last day of entitlement to that benefit.

62.3 The extended support period ends;

(a) at the end of a period of four weeks; or
(b) on the date on which the applicant to whom the extended support (qualifying contributory benefits) is payable has no liability for council tax, if that occurs first.

63.0 Amount of extended support (qualifying contributory benefits)

63.1 For any week during the extended support period the amount of the extended support (qualifying contributory benefits) payable to an applicant shall be the higher of;

(a) the amount of council tax support to which the applicant was entitled under the general conditions of entitlement in the last support week before the applicant or the applicant's partner ceased to be entitled to a qualifying contributory benefit;
(b) the amount of council tax support to which the applicant would be entitled under the general conditions of entitlement for any support week during the extended support period, if section 61 (extended reductions (qualifying contributory benefits) did not apply to the applicant; or
(c) the amount of council tax support to which the applicant's partner would be entitled under the general conditions of entitlement, if section 61 did no apply to the applicant.

63.2 Section 63.1 does not apply in the case of a mover.

63.3 Where an applicant is in receipt of extended support (qualifying contributory benefits) under this section and the applicant's partner makes a claim for council tax support, no amount of council tax support shall be payable by the appropriate authority during the extended support period.

64.0 Extended support (qualifying contributory benefits) – movers

64.1 This section applies;
(a) to a mover; and
(b) from the Monday following the day of the move.

64.2 The amount of the extended support (qualifying contributory benefit) payable from the Monday from which this section applies until the end of the extended support period shall be the amount of council tax support which was payable to the mover for the last support week before the mover, or the mover's partner, ceased to be entitled to a qualifying contributory benefit.

64.3 Where a mover's liability to pay council tax in respect of the new dwelling is to the second authority, the extended support (qualifying contributory benefits) may take the form of a payment from the appropriate authority to-

the second authority; or
the mover directly.

64.4 Where

(a) a mover, or the mover's partner, makes a claim for council tax support to the second authority after the mover, or the mover's partner, ceased to be entitled to a qualifying contributory benefit; and
(b) the mover, or the mover's partner, is in receipt of extended support (qualifying contributory benefits) from the appropriate authority, the second authority shall reduce the weekly amount of council tax support that the mover, or the mover's partner, is entitled to by a sum equal to the amount of the extended support (qualifying contributory benefits) until the end of the extended support period.

65.0 Relationship between extended support (qualifying contributory benefits) and entitlement to council tax support under the general conditions of entitlement

65.1 Where an applicant's council tax support award would have ended when the applicant ceased to be entitled to a qualifying contributory benefit in the circumstances listed in section 61.1(b) that award will not cease until the end of the extended support period.

65.2 Changes of circumstances and increases for exceptional circumstances shall not apply to any extended reduction (qualifying contributory benefits) payable in accordance with section 63.1(a) or 64.2 (amount of extended support – movers).

Sections 66 - 67

Dates on which entitlement and changes of circumstances are to take effect

66.0 Date on which entitlement is to begin

66.1 Subject to section 66.2, any person to whom or in respect of whom a claim for council tax support is made and who is otherwise entitled to that support shall be so entitled from the week following the date on which that claim is made or is treated as made.

66.2 Where a person is otherwise entitled to council tax support and becomes liable for the first time for the authority's council tax in respect of a dwelling of which he is a resident in that week in which his claim is made or is treated as made, he shall be so entitled from that week.

67.0 Date on which change of circumstances is to take effect

67.1 Except in cases where section 21 (disregards of changes in tax, contributions, etc) applies and subject to the following provisions of this paragraph, a change of circumstances which affects entitlement to, or the amount of, a reduction under the authority's scheme ("change of circumstances"), takes effect from the first day of the week following the date on which the change actually occurs, and where that change is cessation of entitlement to any benefit under the benefits

Acts, the date on which the change actu be the day immediately following the last day of entitlement to that benefit.

67.2 Subject to paragraph (3), where the change of circumstances is a change in the amount of council tax payable, it takes effect from the day on which it actually occurs.

67.3 Where the change of circumstances is a change in the amount a person is liable to pay in respect of council tax in consequence of regulations under section 13 of the 1992 Act (reduced amounts of council tax) or changes in the discount to which a dwelling may be subject under sections 11 or 12 of that Act, it shall take effect from the day on which the change in amount has effect.

67.4 Where the change of circumstances is the applicant's acquisition of a partner, the change takes effect on the day on which the acquisition takes place.

67.5 Where the change of circumstances is the death of an applicant's partner or their separation, it takes effect on the day the death or separation occurs.

67.6 If two or more changes of circumstances occurring in the same week would, but for this paragraph, take effect in different weeks in accordance with paragraphs (1) to (5) they take effect from the day to which the appropriate paragraph from (2) to (5) above refers, or, where more than one day is concerned, from the earlier day.

67.7 Where the change of circumstances is that income, or an increase in the amount of income, other than a benefit or an increase in the amount of benefit under the Act, is paid in respect of a past period and there was no entitlement to income of that amount during that period, the change of circumstances shall take effect from the first day on which such income, had it been paid in that period at intervals appropriate to that income, would have fallen to be taken into account for the purposes of this scheme.

67.8 Without prejudice to paragraph (7), where the change of circumstances is the payment of income, or arrears of income, in respect of a past period, the change of circumstances takes effect from the first day on which such income, had it been timeously paid in that period at intervals appropriate to that income, would have fallen to be taken into account for the purposes of this scheme.

Section 68 - 75

Claiming and the treatment of claims for council tax support purposes

68.0 Making an application

68.1 In the case of a couple or members of a polygamous marriage an application is to be made by whichever one of them they agree should so apply or, in default of agreement, by such one of them as the authority determines.

68.2 Where a person who is liable to pay council tax in respect of a dwelling is unable for the time being to act; and;

(a) a deputy has been appointed by the Court of Protection with power to claim or, as the case may be, receive benefit on his behalf; or
(b) in Scotland, his estate is being administered by a judicial factor or any guardian acting or appointed under the Adults with Incapacity (Scotland) Act 2000 who has power to apply or, as the case may be, receive benefit on his behalf; or
(c) an attorney with a general power, or a power to apply, or, as the case may be, receive benefit, has been appointed by that person under the Powers of Attorney Act 1971, the Enduring Powers of Attorney Act 1985, or the Mental Capacity Act 2005, or otherwise;

that deputy, judicial factor, guardian or as the case may be, may make an application on behalf of that person.

68.3 Where a person who is liable to pay council tax in respect of a dwelling is unable for the time being to act and sub-paragraph (2) does not apply to him, the authority may, upon written application made to them by a person who, if a natural person, is over the age of 18, appoint that person to exercise on behalf of the person who is unable to act, any right to which that person might be entitled under the authority's scheme and to receive and deal on his behalf with any sums payable to him.

68.4 Where a person who is liable to pay council tax in respect of a dwelling is for the time being unable to act and the Secretary of State has appointed a person to act on his behalf under regulation 33 of the Social Security (Claims and Payments) Regulations 1987 (persons unable to act), the authority may, if that person agrees, treat him as if he had been appointed by them under sub-paragraph (3).

68.5 Where the authority has made an appointment under sub-paragraph (3) or treated a person as an appointee under sub-paragraph (4);

(a) it may at any time revoke the appointment;
(b) the person appointed may resign his office after having given 4 weeks notice in writing to the authority of his intention to do so;
(c) any such appointment terminates when the authority is notified of the appointment of a person mentioned in sub-paragraph (2).

68.6 Anything required by the authority's scheme to be done by or to any person who is for the time being unable to act may be done by or to the persons mentioned in sub-paragraph (2) above or by or to the person appointed or treated as appointed under this paragraph and the receipt of any such person so appointed shall be a good discharge to the authority for any sum paid.

68.7 The authority must;

(a) inform any person making an application of the duty imposed by paragraph 9(1)(a);
(b) explain the possible consequences (including prosecution) of failing to comply with that duty; and
(c) set out the circumstances a change in which might affect entitlement to the reduction or its amount.

69.0 **Procedure by which a person may apply for a reduction under the authority's scheme**

69.1 Paragraphs 2 to 7 apply to an application made under the authority's scheme.

69.2 An application may be made;
(a) in writing using the approved form or by using the on line claim form provided on the Council's website, or
(b) where the authority has published a telephone number for the purpose of receiving such applications, by telephone, or
(c) by submitting a claim for Universal Credit to the Department for Work and Pensions, the content of which and the Universal Credit award will be used to determine council tax support.

69.3 (1) An application which is made in writing must be made to the designated office on a properly completed form.
(2) The form must be provided free of charge by the authority for the purpose.

69.4 (1) Where an application made in writing is defective because-

(a) it was made on the form supplied for the purpose but that form is not accepted by the authority as being properly completed; or

(b) it was made in writing but not on the approved form provided for the purpose and the authority does not accept the application as being in a written form which is sufficient in the circumstances of the case having regard to the sufficiency of the written information and evidence,

the authority may, in a case to which sub-paragraph (a) applies, request the applicant to complete the defective application or, in the case to which sub-paragraph (b) applies, supply the applicant with the approved form or request further information and evidence.

(2) An application made on a form provided by the authority is properly completed if it is completed in accordance with the instructions on the form, including any instructions to provide information and evidence in connection with the application.

69.5 (1) If an application made by electronic communication is defective the authority must provide the person making the application with an opportunity to correct the defect.

(2) An application made by electronic communication is defective if the applicant does not provide all the information the authority requires.

69.6 In a particular case the authority may determine that an application made by telephone is only valid if the person making the application approves a written statement of his circumstances provided by the authority.

69.7 (1) If an application made by telephone is defective the authority must provide the person making the application with an opportunity to correct the defect.

(2) An application made by telephone is defective if the applicant does not provide all the information the authority requests during the telephone call.

69.8 Notwithstanding other paragraphs within the section, the authority will determine the method by which claims are to be made as well as where claims should be sent or delivered.

(1) Where an applicant;

(a) makes an application under this scheme which includes (or which he subsequently requests should include) a period before the application is made; and
(b) from a day in that period, up to the date he made the application (or subsequently requested that the application should include a past period), the applicant had continuous good cause for failing to make an application (or request that the application should include that period),

the application is to be treated as made on the date determined in accordance with sub-paragraph

(2) That date is the latest of;
a. the first day from which the applicant had continuous good cause;
b. the day six months before the date the application was made;
c. the day six months before the date when the applicant requested that the application should include a past period.

70.0 Date on which an application is made

70.1 (a) in a case where;
(i) an award of income support, an income-based jobseeker's allowance or an income-related employment and support allowance or an award of Universal Credit has been made to the applicant or his partner, and
(ii) the application is made within one month of the date on which the claim for that income support, jobseeker's allowance, employment and support allowance or Universal Credit was received,

the first day of entitlement to income support, an income-based jobseeker's allowance, an income-related employment and support allowance or Universal Credit arising from that claim;
(b) in a case where;

(i) an applicant or his partner is in receipt of income support, an income-based jobseeker's allowance or an income-related employment and support allowance or has an award of Universal Credit,
(ii) the applicant becomes liable for the first time to pay council tax in respect of the dwelling which he occupies as his home, and
(iii) the application is received at the designated office within one month of the date of the change,

the date on which the change takes place;

(c) in a case where;
(i) an applicant is the former partner of a person who was, at the date of his death or their separation, entitled to a reduction under the authority's scheme, and
(ii) the applicant makes an application for a reduction under that scheme within one month of the date of the death or the separation,

the date of the death or the separation;

(d) except where paragraph (c) is satisfied, in a case where a properly completed application is received within one month (or such longer period as the authority considers reasonable) of the date on which an application form was issued to an applicant following the applicant first notifying, by whatever means, the authority of an intention to make an application, the date of first notification;

(e) in any other case, the date on which an application is received at the designated office.

70.2 For the purposes only of sub-paragraph (1)(a) a person who has been awarded an income-based jobseeker's allowance or an income-related employment and support allowance is to be treated as entitled to that allowance for any days which immediately precede the first day in that award and on which he would, but for regulations made under;

(a) in the case of income-based jobseeker's allowance, paragraph 4 of Schedule 1 to the Jobseekers Act 1995 (waiting days); or
(b) in the case of income-related employment and support allowance, paragraph 2 of Schedule 2 to the Welfare Reform Act 2007 (waiting days),

have been entitled to that allowance.

70.3 Where there is a defect in an application by telephone;

(a) is corrected within one month (or such longer period as the authority considers reasonable) of the date the authority last drew attention to it, the authority must treat the application as if it had been duly made in the first instance;
(b) is not corrected within one month (or such longer period as the authority considers reasonable) of the date the authority last drew attention to it, the authority must treat the application as if it had been duly made in the first instance where it considers it has sufficient information to decide the application.

70.4 The authority is to treat a defective application as if it had been validly made in the first instance if, in any particular case, the conditions specified in sub-paragraph (5)(a), (b) or (c) are satisfied.

70.5 The conditions are that-

(a) where the authority receives the properly completed application, or the information requested to complete it, or the evidence within one month of the request, or such longer period as the authority may consider reasonable; or
(b) where an application is not on the approved form or further information requested by the authority applies;
(i) the approved form sent to the applicant is received at the offices of the authority properly completed within one month of it having been sent to him; or, as the case may be;
(ii) the applicant supplies whatever information or evidence was requested within one month of the request; or,

in either case, within such longer period as the authority may consider reasonable; or

(c) where the authority has requested on, the authority receives at its offices the properly completed application or the information requested to complete it within one month of the request or within such longer period as the authority considers reasonable.

70.6 Except in the case of an application made by a person treated as not being in Great Britain, where a person has not become liable for council tax to the authority but it is anticipated that he will become so liable within the period of 8 weeks (the relevant period), he may apply for a reduction under that authority's scheme at any time in that period in respect of that tax and, provided that liability arises within the relevant period, the authority must treat the application as having been made on the day on which the liability for the tax arises.

70.7 Except in the case of an application made by a person treated as not being in Great Britain, where the applicant is not entitled to a reduction under the authority's scheme in the week immediately following the date of his application but the authority is of the opinion that unless there is a change of circumstances he will be entitled to a reduction under its scheme for a period beginning not later than;

(a) in the case of an application made by;
  (i) a pensioner, or
  (ii) a person who has attained, or whose partner has attained, the age which is 17 weeks younger than the qualifying age for state pension credit,
  the seventeenth reduction week following the date on which the application is made, or
(b) in the case of an application made by a person who is not a pensioner, the thirteenth reduction week following the date on which the application is made,

the authority may treat the application as made on a date in the week immediately preceding the first reduction week of that period of entitlement and award a reduction accordingly.

70.8 In this paragraph "appropriate DWP office" means an office of the Department for Work and Pensions dealing with state pension credit or an office which is normally open to the public for the receipt of claims of income support, a job seekers allowance or an employment and support allowance.

71.0 Submission of evidence electronically

71.1 The authority may accept such evidence, documents and certificates to support the claim electronically where it feels that this would be acceptable given the nature of the claim.

72.0 Use of telephone provided evidence

72.1 The authority may accept such evidence to support the claim by telephone where it feels that this would be acceptable given the nature of the claim.

73.0 Information and evidence

73.1 Subject to sub-paragraph (3), a person who makes an application for a reduction under an authority's scheme must satisfy sub-paragraph (2) in relation both to himself and to any other person in respect of whom he is making the application.

73.2 This sub-paragraph is satisfied in relation to a person if-

(a) the application is accompanied by;
  (i) a statement of the person's national insurance number and information or evidence establishing that that number has been allocated to the person; or
  (ii) information or evidence enabling the authority to ascertain the national insurance number that has been allocated to the person; or
(b) the person has made an application for a national insurance number to be allocated to him and the application for the reduction is accompanied by;
  (i) evidence of the application for a national insurance number to be so allocated;
  And
  (ii) the information or evidence enabling it to be so allocated.

73.3 Sub-paragraph (2) does not apply;

(a) in the case of a child or young person in respect of whom an application for a reduction is made;
(b) to a person who;
  (i) is a person treated as not being in Great Britain for the purposes of this scheme;
  (ii) is subject to immigration control within the meaning of section 115(9)(a) of the Immigration and Asylum Act 1999; and
  (iii) has not previously been allocated a national insurance number.

73.4 Subject to sub-paragraph (5), a person who makes an application, or a person to whom a reduction under the authority's scheme has been awarded, must furnish such certificates, documents, information and evidence in connection with the application or the award, or any question arising out of the application or the award, as may reasonably be required by that authority in order to determine that person's entitlement to, or continuing entitlement to a reduction under its scheme and must do so within one month of the authority requiring him to do so or such longer period as the authority may consider reasonable.

73.5 Nothing in this paragraph requires a person who is a pensioner to furnish any certificates, documents, information or evidence relating to a payment to which sub-paragraph (7) applies.

73.6 Where the authority makes a request under sub-paragraph (4), it must;

(a) inform the applicant or the person to whom a reduction under its scheme has been awarded of his duty under paragraph 9 (duty to notify change of circumstances) to notify the authority of any change of circumstances; and
(b) without prejudice to the extent of the duty owed under paragraph 9, indicate to him either orally or by notice or by reference to some other document available to him on application and without charge, the kind of change of circumstances which must be notified.

73.7 This sub-paragraph applies to any of the following payments;

(a) a payment which is made under or by the Trusts, the Fund, the Eileen Trust, MFET Limited, the Skipton Fund, the Caxton Foundation or the London Bombings Relief Charitable Fund;
(b) a payment which is disregarded under paragraph 24 of Schedule 5, other than a payment under the Independent Living Fund (2006);
(c) a payment which is disregarded under paragraph 58.9.

73.8 Where an applicant or a person to whom a reduction under the authority's scheme has been awarded or any partner has attained the qualifying age for state pension credit and is a member of, or a person deriving entitlement to a pension under, a personal pension scheme, he must where the authority so requires furnish the following information;

(a) the name and address of the pension fund holder;
(b) such other information including any reference or policy number as is needed to enable the personal pension scheme to be identified.

74.0 Amendment and withdrawal of application

74.1 A person who has made an application may amend it at any time before a decision has been made on it by a notice in writing delivered or sent to the designated office.

74.2 Where the application was made by telephone the amendment may also be made by telephone.

74.3 Any application amended is to be treated as if it had been amended in the first instance.

74.4 A person who has made an application may withdraw it by notice to the designated office at any time before a decision has been made on it.

74.5 Where the application was made by telephone, the withdrawal may also be made by telephone.

74.6 Any notice of withdrawal given in accordance with sub-paragraph (4) or (5) has effect when it is received.

74.7 Where a person, by telephone, amends or withdraws an application the person must (if required to do so by the authority) confirm the amendment or withdrawal by a notice in writing delivered or sent to the designated office.

75.0 Duty to notify changes of circumstances

75.1 Subject to sub-paragraphs (3), (6) and (7), an applicant (or any person acting on his behalf) must comply with sub-paragraph (2) if there is a relevant change of circumstances at any time;

(a) between the making of an application and a decision being made on it, or
(b) after the decision is made (where the decision is that the applicant is entitled to a reduction under the authority's scheme) including at any time while the applicant is in receipt of such a reduction.

75.2 The applicant (or any person acting on his behalf) must notify any change of circumstances which the applicant (or that person) might reasonably be expected to know might affect his entitlement to, or the amount of, a reduction under the authority's scheme (a "relevant change of circumstances") by giving notice to the authority;

(a) in writing, or by using the on line claim form provided on the Council's website
(b) by telephone-
    (i) where the authority has published a telephone number for that purpose unless the authority determines that in any particular case or class of case notification may not be given by telephone; or
    (ii) in any case or class of case where the authority determines that notice may be given by telephone; or
(c) by any other means which the authority agrees to accept in any particular case, within a period of one calendar month beginning with the day on which the change occurs, or as soon as reasonably practicable after the change occurs, whichever is later.

75.3 The duty imposed on a person by sub-paragraph (1) does not extend to notifying

(a) changes in the amount of council tax payable to the authority;
(b) changes in the age of the applicant or that of any member of his family;
(c) in the case of an applicant in receipt of a relevant benefit, changes in circumstances which affect the amount of the benefit but not the amount of the reduction under the authority's scheme to which he is entitled, other than the cessation of that entitlement to the benefit.

75.4 For the purposes of sub-paragraph (3)(c) "relevant benefit" means income support, an income based jobseeker's allowance or an income-related employment and support allowance or Universal Credit.

75.5 Notwithstanding sub-paragraph (3)(b) or (c) an applicant is required by sub-paragraph (1) to notify the authority of any change in the composition of his family arising from the fact that a person who was a member of his family is now no longer such a person because he has ceased to be a child or young person.

75.6 The duty imposed on a person by sub-paragraph (1) includes in the case of a person falling within alternative maximum council tax support scheme, giving written notice to the authority of changes which occur in the number of adults in the dwelling or in their total gross incomes and, where any such adult ceases to be in receipt of state pension credit, the date when this occurs.

75.7 All changes in circumstances should be notified to the authority in writing (or by whatever format agreed by the authority) within one calendar month of the happening of the event or change in

circumstance. This timescale may be ex scretion of the authority. Where such a change is not received within that timescale and where the change would increase the level of reduction payable, the effective date used by the authority will be the Monday of the week following the receipt of the notification.

Sections 76 - 83

Decisions, decision notices and awards of council tax support

76.0 Decisions by the authority

76.1 The authority must make a decision on an application under its scheme within 14 days of paragraphs 4 and 7 and section 69 being satisfied, or as soon as reasonably practicable thereafter.

77.0 Notification of decision

77.1 The authority must notify in writing any person affected by a decision made by it under its scheme;

(a) in the case of a decision on an application, forthwith or as soon as reasonably practicable thereafter;
(b) in any other case where there is a reduction in the amount of council tax support payable, within 14 days of that decision or as soon as reasonably practicable thereafter.

77.2 Where the decision is to award a reduction, the notification under sub-paragraph (1) must include a statement;

(a) informing the person affected of the duty imposed by 75.1;
(b) explaining the possible consequences (including prosecution) of failing to comply with that duty; and
(c) setting out the circumstances a change in which might affect entitlement to the reduction or its amount.

77.3 Where the decision is to award a reduction, the notification under sub-paragraph (1) must include a statement as to how that entitlement is to be discharged.

77.4 In any case, the notification under sub-paragraph (1) must inform the person affected of the procedure by which an appeal may be made and must refer the person to the provisions in the authority's scheme relating to the procedure for making an appeal.

77.5 A person affected to whom the authority sends or delivers a notification of decision may, within one month of the date of the notification of that decision, request in writing the authority to provide a written statement setting out the reasons for its decision on any matter set out in the notice.

77.6 The written statement referred to in sub-paragraph (5) must be sent to the person requesting it within 14 days or as soon as reasonably practicable thereafter.

77.7 For the purposes of this paragraph a person is to be treated as a person affected by a decision of the authority under its scheme where the rights, duties or obligations of that person are affected by that decision and the person falls within sub-paragraph (8).

77.8 This sub-paragraph applies to-

(a) the applicant;
(b) in the case of a person who is liable to pay council tax in respect of a dwelling and is unable for the time being to act;

(i) a deputy appointed by the Court with power to claim or, as the case may be, receive benefit on his behalf; or
(ii) in Scotland, a judicial factor or any guardian acting or appointed under the Adults with Incapacity (Scotland) Act 2000(3) who has power to apply or, as the case may be, receive benefit on the person's behalf; or
(iii) an attorney with a general power or a power to apply or, as the case may be, receive benefit, has been appointed by that person under the Powers of Attorney Act 1971, the Enduring Powers of Attorney Act 1985 or the Mental Capacity Act 2005 or otherwise;

(c) a person appointed by the authority to act for a person unable to act.

78.0 Time and manner of granting council tax support

78.1 Where a person is entitled to a reduction under this authority's scheme in respect of his liability for the authority's council tax as it has effect in respect of a chargeable financial year ("the chargeable year"), the authority must discharge his entitlement;

(a) by reducing, so far as possible, the amount of his liability to which regulation 20(2) of the Council Tax (Administration and Enforcement) Regulations 1992 refers; or
(b) where;
(i) such a reduction is not possible; or
(ii) such a reduction would be insufficient to discharge the entitlement to a reduction under the authority's scheme; or
(iii) the person entitled to the reduction is jointly and severally liable for the council tax and the authority determines that such a reduction would be appropriate, by making payment to him of the amount of reduction to which he is entitled, rounded where necessary to the nearest penny.

78.2 The authority must notify the person entitled to a reduction under this scheme of the amount of that reduction and how his entitlement is to be discharged in pursuance of paragraph (1).

78.3 In a case to which paragraph (1)(b) refers;

(a) if the amount of the council tax for which he remains liable in respect of the chargeable year, after any reduction to which sub-paragraph (1)(a) refers has been made, is sufficient to enable his entitlement to a reduction under the authority's scheme in respect thereof to be discharged, upon the final instalment of that tax becoming due any outstanding reduction;
(i) must be paid to that person if he so requires; or
(ii) in any other case must (as the authority determines) either be repaid or credited against any subsequent liability of the person to make a payment in respect of the authority's council tax as it has effect for any subsequent year;
(b) if that person has ceased to be liable for the authority's council tax and has discharged the liability for that tax, the outstanding balance (if any) of the reduction under the authority's scheme in respect thereof must be paid within 14 days or, if that is not reasonably practicable, as soon as practicable thereafter
(c) in any other case, the reduction under the authority's scheme must be paid within 14 days of the receipt of the application at the offices of the authority or, if that is not reasonably practicable, as soon as practicable thereafter.

78.4 For the purposes of this paragraph "instalment" means any instalment of the authority's council tax to which regulation 19 of the Council Tax (Administration and Enforcement) Regulations 1992 refers (council tax payments).

79.0 Persons to whom support is to be paid

79.1 Subject to section 81 (payment on death) and paragraph (2), any payment of the amount of a reduction must be made to that person.

79.2 Where a person other than a person who is entitled to a reduction under this authority's scheme made the application for the reduction and that first person is a person acting pursuant to an

appointment or is treated as having beePage 1234 the amount of the reduction may be paid to that person.

80.0 Shortfall in support

80.1 Where, on the revision of a decision allowing a reduction under the authority's scheme to a person, it is determined that the amount allowed was less than the amount to which that person was entitled, the authority must either;

(a) make good any shortfall in reduction which is due to that person, by reducing so far as possible the next and any subsequent payments he is liable to make in respect of the council tax of the authority as it has effect for the chargeable financial year until that shortfall is made good; or
(b) where this is not possible or the person concerned so requests, pay the amount of any shortfall in reduction due to that person within 14 days of the revision of the decision being made or if that is not reasonably practicable, as soon as possible afterwards.

81.0 Payment on the death of the person entitled

81.1 Where the person entitled to any reduction under this scheme has died and it is not possible to award the support which is due in the form of a reduction of the council tax for which he was liable, the authority must make payment of the amount of the reduction to his executor or administrator in accordance with regulation 58(4) of the Council Tax (Administration and Enforcement) Regulations 1992.

82.0 Offsetting

82.1 Where a person has been allowed or paid a sum of council tax support under a decision which is subsequently revised or further revised, any sum allowed or paid in respect of a period covered by the subsequent decision shall be offset against arrears of entitlement under the subsequent decision except to the extent that the sum exceeds the arrears and shall be treated as properly awarded or paid on account of them.

83.0 Payment where there is joint and several liability

83.1 Where;

(a) a person is entitled to a reduction under the authority's scheme in respect of his liability for the authority's council tax as it has effect in respect of a chargeable financial year;
(b) the person entitled to the reduction is jointly and severally liable for the council tax; and
(c) the authority determines that discharging his entitlement by reducing the amount of his liability to which regulations 20(2) of the Council Tax (Administration and Enforcement) Regulations 1992(7) refers would be inappropriate,

it may make a payment to him of the amount of the reduction to which he is entitled, rounded where necessary to the nearest penny.

83.2 Subject to sub-paragraph (3) any payment made under sub-paragraph (1) must be made to the person who is entitled to the reduction.

83.3 Where a person other than a person who is entitled to a reduction under the authority's scheme made the application and that first person is a person acting pursuant to an appointment under paragraph 4(3) or is treated as having been so appointed by virtue of paragraph 4(4), the amount of the reduction may be paid to that person.

Sections 84 - 87

Collection, holding and forwarding of information

84.0 Use of information from and to the Department for Work and Pensions (DWP) and Her Majesty's Revenue and Customs (HMRC)

84.1 The authority will use information provided by the DWP and HMRC for the purposes of council tax support, council tax liability, billing, administration and enforcement as outlined within Schedule 2 of the Local Government Finance Act 1992 as amended by the Local Government Finance Act 2012.

84.2 Where required by the relevant department and where required by law, the authority will share information obtained for council tax support with the DWP or HMRC as appropriate.

85.0 Collection of information

85.1 The authority may receive and obtain information and evidence relating to claims for council tax support, the council may receive or obtain the information or evidence from-

(a) persons making claims for council tax support;
(b) other persons in connection with such claims;
(c) other local authorities; or
(d) central government departments including the DWP and HMRC

85.2 The authority may verify relevant information supplied to, or obtained.

86.0 Recording and holding information

86.1 The authority may

(a) may make a record of such information; and
(b) may hold that information, whether as supplied or obtained or recorded, for the purpose of forwarding it to the person or authority for the time being administering council tax support.

87.0 Forwarding of information

87.1 The authority may forward it to the person or authority for the time being administering claims to or awards of council tax support to which the relevant information relates, being

(i) a local authority;
(ii) a person providing services to a local authority; or
(iii) a person authorised to exercise any function of a local authority relating to council tax support.

Sections 88 - 91

Revisions, written statements, termination of council tax support

88.0 Persons affected by decisions

88.1 A person is to be treated as a person affected by a relevant decision of the authority where that person is;

a. an applicant;

b. in the case of a person who is liable to make payments in respect of a dwelling and is unable for the time being to act
   (i) a Deputy appointed by the Court of Protection with power to claim, or, as the case may be, receive benefit or support on his behalf,
   (ii) in Scotland, a tutor, curator, judicial factor or other guardian acting or appointed in terms of law administering that person's estate, or
   (iii) an attorney with a general power or a power to receive benefit or support appointed by the person liable to make those payments under the Powers of Attorney Act 1971, the Enduring Powers of Attorney Act 1985 or the Mental Capacity Act 2005 or otherwise;
c. a person appointed by the authority under this scheme;

89.0 Revisions of decisions

89.1 Subject to the provisions in this scheme, a relevant decision ('the original decision') may be revised or further revised by the authority, which made the decision where the person affected makes an application for a revision within;

   (i) one month of the date of notification of the original decision; or
   (ii) such extended time as the authority may allow.

89.2 The authority may revise or further revise that original decision at any time. Where further information is required from the person affected, the authority shall request such information and evidence as it feels is reasonable. Such information must be supplied within;

   (i) one month of the date of notification of the additional information; or
   (ii) such extended time as the authority may allow

90.0 Written statements

90.1 Subject to the provisions in the scheme, the authority may upon a written request issue a written statement to a person affected to further explain the decision of the authority in relation to council tax support. The request must be received within one month of the date of notification being issued by the authority.

91.0 Terminations

91.1 The authority may terminate support in whole or in part the council tax support where it appears to the authority that an issue arises whether;

a. the conditions for entitlement to council tax support are or were fulfilled; or
b. a decision as to an award of such a support should be revised or superseded.

91.2 The authority may terminate, in whole or in part the council tax support where it appears to the authority that an issue arises whether;

a. the conditions for entitlement to council tax support are or were fulfilled; or
b. a decision as to an award of such a support should be revised or superseded.

Where the person fails to provide information to the authority as requested in relation to any matter relating to their liability for council tax.

Section 92

Appeals against the authority's decisions

92.0 Procedure by which a person may make an appeal against certain decisions of the authority

92.1 A person who is aggrieved by a decision, which affects;

(a) the person's entitlement to a reduction under its scheme, or
(b) the amount of any reduction to which that person is entitled,

may serve a written notice on the authority stating the matter by which, and the grounds on which, he is aggrieved.

92.2 The authority must

(a) consider the matter to which the notice relates;
(b) notify the aggrieved person in writing;
  (i) that the ground is not well founded, giving reasons for that belief; or
  (ii) that steps have been taken to deal with the grievance, stating the steps taken.

92.3 Where, following notification under sub-paragraph (2)(b)(i) or (ii), the person is still aggrieved, or if the authority fails to notify the person aggrieved in accordance with sub-paragraph (2)(b) within two months of the service of his notice, he may appeal to the valuation tribunal under section 16 of the 1992 Act.

Section 93

Procedure for applying for a discretionary reduction

93.0 Procedure for an application to the authority for a reduction under section 13A(1)(c) of the 1992 Act

93.1 An application to the authority for a reduction under section 13A(1)(c) of the 1992 Act may be made;

(a) in writing,
(b) by means of an electronic communication in accordance this scheme or
(c) where the authority has published a telephone number for the purpose of receiving such applications, by telephone.

93.2 Where;

(a) the authority has made a determination under section 13A(1)(c) in relation to a class of case in which liability is to be reduced; and
(b) a person in that class would otherwise be entitled to a reduction under its scheme, that person's application for a reduction under the authority's scheme may also be treated as an application for a reduction under section 13A(1)(c).

Section 94 - 100

Electronic communication

94.0 Interpretation

94.1 In this Part;
"information" includes an application, a certificate, notice or other evidence; and
"official computer system" means a computer system maintained by or on behalf of an authority for sending, receiving, processing or storing of any information.

95.0 Conditions for the use of electronic communication

95.1 The authority may use an electronic comnnection with applications for, and awards of, reductions under its scheme.

95.2 A person other than the authority may use an electronic communication in connection with the matters referred to in sub-paragraph (1) if the conditions specified in sub-paragraphs (3) to (6) are satisfied.

95.3 The first condition is that the person is for the time being permitted to use an electronic communication by an authorisation given by means of a direction of the Chief Executive of the authority.

95.4 The second condition is that the person uses an approved method of:
(a) authenticating the identity of the sender of the communication;
(b) electronic communication;
(c) authenticating any application or notice delivered by means of an electronic communication; and
(d) subject to sub-paragraph (7), submitting to the authority any information.

95.5 The third condition is that any information sent by means of an electronic communication is in a form approved for the purposes.

95.6 The fourth condition is that the person maintains such records in written or electronic form as may be specified in a direction given by the Chief Executive of the authority.

95.7 Where the person uses any method other than the method approved of submitting any information, that information is to be treated as not having been submitted.

95.8 In this paragraph "approved" means approved by means of a direction given by the Chief Executive of the authority for the purposes of this section.

96.0 Use of intermediaries

96.1 The authority may use intermediaries in connection with;
(a) the delivery of any information by means of an electronic communication; and
(b) the authentication or security of anything transmitted by such means,
and may require other persons to use intermediaries in connection with the matters.

97.0 Effect of delivering information by means of electronic communication

97.1 Any information which is delivered by means of an electronic communication is to be treated as having been delivered in the manner or form required by any provision of an authority's scheme on the day the condition imposed;
(a) by this section; and
(b) by or under an enactment,
are satisfied.

97.2 The authority may determine that any information is to be treated as delivered on a different day (whether earlier or later) from the day provided for in sub-paragraph (1).

97.3 Information may not be taken to have been delivered to an official computer system by means of an electronic communication unless it is accepted by the system to which it is delivered.

98.0 Proof of identity of sender or recipient of information

98.1 If it is necessary to prove, for the purpose of any legal proceedings, the identity of-
(a) the sender of any information delivered by means of an electronic communication to an official computer system, or
(b) the recipient of any such information delivered by means of an electronic communication from an official computer system,

the sender or recipient, as the case maPage 1239esumed to be the person whose name is recorded as such on that official computer system.

99.0 Proof of delivery of information

99.1 If it is necessary to prove, for the purpose of any legal proceedings, that the use of an electronic communication has resulted in the delivery of any information this is presumed to have been the case where;

(a) any such information has been delivered to the relevant authority, if the delivery of that information has been recorded on an official computer system; or

(b) any such information has been delivered by the relevant authority, if the delivery of that information has been recorded on an official computer system.

99.2 If it is necessary to prove, for the purpose of any legal proceedings, that the use of an electronic communication has resulted in the delivery of any such information, this is presumed not to be the case, if that information delivered to the relevant authority has not been recorded on an official computer system.

99.3 If it is necessary to prove, for the purpose of any legal proceedings, when any such information sent by means of an electronic communication has been received, the time and date of receipt is presumed to be that recorded on an official computer system.

100.0 Proof of content of information

100.1 If it is necessary to prove, for the purpose of any legal proceedings, the content of any information sent by means of an electronic communication, the content is presumed to be that recorded on an official computer system.

Section 101

Counter fraud and compliance

101.0 Counter fraud and compliance

101.1 In order to protect the finances of the authority and also in the interests of all council taxpayers, the authority will undertake such actions as allowed by law to:

a. Prevent and detect fraudulent claims and actions in respect of council tax support;
b. Carry out investigations fairly, professionally and in accordance with the law; and
c. Ensure that sanctions are applied in appropriate cases

101.2 The authority believes that is important to minimise the opportunity for fraud and;

a. will implement rigorous procedures for the verification of claims for council tax support;
b. will employ sufficient Officers to fulfil the authority's commitment to combat fraud;
c. will actively tackle fraud where it occurs in accordance with this scheme;
d. will co-operate with the Department for Work and Pensions (DWP), Her Majesty's Revenues and Customs and take part in joint working including prosecutions; and
e. will in all cases seek to recover all outstanding council tax.

101.3 Where the Council has evidence of fraud and/or error, it reserves the right to withhold and/or recalculate Council Tax Support, whether or not the claimant is in receipt of a benefit administered by the Department for Work and Pensions.

101.4 The authority shall put into place such administrative policies, procedures and processes as are necessary to ensure that the actions outlined within section 101.1 to 101.3 can be carried out successfully.

Schedule 1

Sums to be disregarded in the calculation of earnings

1. Where the applicant is either single or one of a couple and a member of that couple is in employment, a maximum £10 weekly disregard will be applied to earnings.

Schedule 2

Sums to be disregarded in the calculation of income other than earnings

1. Any amount paid by way of tax on income, which is to be taken into account under section 30 (calculation of income other than earnings).

2. Any payment made to the claim and in respect of any travel or other expenses incurred, or to be incurred, by him in respect of his participation in the Mandatory Work Activity Scheme.

3. Any payment made to the applicant in respect of any travel or other expenses incurred, or to be incurred, by him in respect of his participation in the Employment, Skills and Enterprise Scheme, but only for 52 weeks beginning with the date of receipt of the payment.

4. Any payment in respect of any expenses incurred or to be incurred by an applicant who is-

(a) engaged by a charitable or voluntary organisation, or
(b) volunteer,
if he otherwise derives no remuneration or profit from the employment and is not to be treated as possessing any earnings under section 29.0 (notional income).

5. Any payment in respect of expenses arising out of the applicant's participation as a service user.

6. In the case of employment as an employed earner, any payment in respect of expenses wholly, exclusively and necessarily incurred in the performance of the duties of the employment.

7. Where an applicant is on income support, an income-based job seeker's allowance or employment and support allowance the whole of his income. Those in the work related activity group or support group will also have the whole of this income disregarded if they do not receive Universal Credit.

8. Where the applicant is a member of a joint-claim couple for the purposes of the Jobseekers Act and his partner is on income-based jobseeker's allowance, the whole of the applicant's income.

9. Where the applicant, or the person who was the partner of the applicant on 31 March 2003, was entitled on that date to income support or an income-based jobseeker's allowance but ceased to be so entitled on or before 5 April 2003 by virtue only of regulation 13 of the Housing Benefit (General) Amendment (No. 3) Regulations 1999 as in force at that date, the whole of his income.

10. Any disability living allowance or person's payment or AFIP

11. Any concessionary payment made to compensate for the non-payment of;

(a) any payment specified in paragraph 7 or 10;
(b) income support;
(c) an income-based jobseeker's allowance.
(d) an income-related employment and support allowance.

12. Any mobility supplement under article 20 of the Naval, Military and Air Forces Etc (Disablement and Death) Service Pensions Order 2006 (including such a supplement by virtue of any other scheme or order) or under article 25A of the Personal Injuries (Civilians) Scheme 1983 or any payment intended to compensate for the non-payment of such a supplement.

13. Any attendance allowance.

14. Any payment to the applicant as holder of the Victoria Cross or of the George Cross or any analogous payment.

15. 100% of any of the following, namely

(a) a war disablement pension (except insofar as such a pension falls to be disregarded under paragraph 9 or 10);
(b) a war widow's pension or war widower's pension;
(c) a pension payable to a person as a widow, widower or surviving civil partner under any power of Her Majesty otherwise than under an enactment to make provision about pensions for or in respect of persons who have been disabled or have died in consequence of service as members of the armed forces of the Crown;
(d) a guaranteed income payment;
(e) a payment made to compensate for the non-payment of such a pension or payment as is mentioned in any of the preceding sub-paragraphs;
(f) a pension paid by the government of a country outside Great Britain which is analogous to any of the pensions or payments mentioned in sub-paragraphs (a) to (d) above;
(g) pension paid to victims of National Socialist persecution under any special provision made by the law of the Federal Republic of Germany, or any part of it, or of the Republic of Austria;
(h) an Armed Forces Compensation Scheme payment, including military compensation

16. Any payment made to the applicant by a child or young person or a non-dependant.

17. (1) Any payment made to the applicant in respect of a person who is a member of his family-

(a) pursuant to regulations under section 2(6)(b), 3 or 4 of the Adoption and Children Act 2002 or in accordance or with a scheme approved by the Scottish Ministers under section 51A of the Adoption (Scotland) Act 1978(b) (schemes for payments of allowances to adopters); or in accordance with an Adoption Allowance Scheme made under section 71 of the Adoption and Children (Scotland) Act 2007 (Adoption Allowance Schemes)
(b) which is a payment made by a local authority in pursuance of section 15(1) of, and paragraph 15 of Schedule 1 to, the Children Act 1989 (local authority contribution to a child's maintenance where the child is living with a person as a result of a residence order) or in Scotland section 50 of the Children Act 1975 (payments towards maintenance of children);
(c) which is a payment made by an authority, as defined in Article 2 of the Children Order, in pursuance of Article 15 of, and paragraph 17 of Schedule 1 to, that Order (contribution by an authority to child's maintenance);
(d) in accordance with regulations made pursuant to section 14F of the Children Act 1989(c) (special guardianship support services);

(2) Any payment, other than a paym b-paragraph (1)(a) applies, made to the applicant pursuant to regulations under section 2(6)(b), 3 or 4 of the Adoption and Children Act 2002.

18. Any payment made to the applicant with whom a person is accommodated by virtue of arrangements made

(a) by a local authority under-
  (i) section 23(2)(a) of the Children Act 1989 (provision of accommodation and maintenance for a child whom they are looking after),
  (ii) section 26 of the Children (Scotland) Act 1995 (manner of provision of accommodation to child looked after by local authority), or
  (iii) regulations 33 or 51 of the Looked After Children (Scotland) Regulations 2009 (fostering and kinship care allowances and fostering allowances); or
(b) by a voluntary organisation under section 59(1)(a) of the Children Act 1989 (provision of accommodation by voluntary organisations).

19. Any payment made to the applicant or his partner for a person ('the person concerned'), who is not normally a member of the applicant's household but is temporarily in his care, by-

(a) a health authority;
(b) a local authority but excluding payments of housing benefit made in respect of the person concerned;
(c) a voluntary organisation;
(d) the person concerned pursuant to section 26(3A) of the National Assistance Act 1948;
(e) a primary care trust established under section 16A of the National Health Service Act 1977 or established by an order made under section 18(2)(c) of the National Health Service Act 2006; or
(f) a Local Health Board established under section 16BA of the National Health Service Act 1977 or established by an order made under section 11 of the National Health Service (Wales) Act 2006.

20. Any payment made by a local authority in accordance with section 17, 23B, 23C or 24A of the Children Act 1989 or, as the case may be, section 12 of the Social Work (Scotland) Act 1968 or section 22, 29 or 30 of the Children (Scotland) Act 1995 (provision of services for children and their families and advice and assistance to certain children).

21. (1) Subject to sub-paragraph (2), any payment (or part of a payment) made by a local authority in accordance with section 23C of the Children Act 1989(e) or section 29 of the Children (Scotland) Act 1995 (local authorities' duty to promote welfare of children and powers to grant financial assistance to persons in, or formerly in, their care) to a person ('A') which A passes on to the applicant.

(2) Sub-paragraph (1) applies only where A;
  (a) was formerly in the applicant's care, and
  (b) is aged 18 or over, and
  (c) continues to live with the applicant.

22. (1) Subject to sub-paragraph (2), any payment received under an insurance policy taken out to insure against the risk of being unable to maintain repayments;

  (a) on a loan which is secured on the dwelling which the applicant occupies as his home; or
  (b) under a regulated agreement as defined for the purposes of the Consumer Credit Act 1974 or under a hire-purchase agreement or a conditional sale agreement as defined for the purposes of Part 3 of the Hire-Purchase Act 1964.

(2) A payment referred to in sub-para only be disregarded to the extent that the payment received under that policy does not exceed the amounts, calculated on a weekly basis, which are used to-

(a) maintain the repayments referred to in sub-paragraph (1)(a) or, as the case may be, (b);

and

(b) meet any amount due by way of premiums on-

(i) that policy; or

(ii) in a case to which sub-paragraph (1)(a) applies, an insurance policy taken out to insure against loss or damage to any building or part of a building which is occupied by the applicant as his home and which is required as a condition of the loan referred to in sub-paragraph (1)(a).

23. Any payment of income which, by virtue of section 36 (income treated as capital) is to be treated as capital.

24. Any social fund payment made pursuant to Part 8 of the Act (the Social Fund).

25. Any payment under Part 10 of the Act (Christmas bonus for pensioners).

26. (1) Any payment made under or by any of the Trusts, the Fund, the Eileen Trust, MFET Limited, the Skipton Fund, the Caxton Foundation or the Independent Living Fund (2006).

(2) Any payment by or on behalf of a person who is suffering or who suffered from haemophilia or who is or was a qualifying person, which derives from a payment made under or by any of the Trusts to which sub-paragraph (1) refers and which is made to or for the benefit of-

(a) that person's partner or former partner from whom he is not, or where that person has died was not, estranged or divorced or with whom he has formed a civil partnership that has not been dissolved or, where that person has died, had not been dissolved at the time of that person's death;

(b) any child who is a member of that person's family or who was such a member and who is a member of the applicant's family; or

(c) any young person who is a member of that person's family or who was such a member and who is a member of the applicant's family.

(3) Any payment by or on behalf of the partner or former partner of a person who is suffering or who suffered from haemophilia or who is or was a qualifying person provided that the partner or former partner and that person are not, or if either of them has died were not, estranged or divorced or, where the partner or former partner and that person have formed a civil partnership, the civil partnership has not been dissolved or, if either of them has died, had not been dissolved at the time of the death, which derives from a payment made under or by any of the Trusts to which sub-paragraph (1) refers and which is made to or for the benefit of;

(a) the person who is suffering from haemophilia or who is a qualifying person;

(b) any child who is a member of that person's family or who was such a member and who is a member of the applicant's family; or

(c) any young person who is a member of that person's family or who was such a member and who is a member of the applicant's family.

(4) Any payment by a person who is suffering from haemophilia or who is a qualifying person, which derives from a payment under or by any of the Trusts to which sub-paragraph (1) refers, where;

(a) that person has no partner or former partner from whom he is not estranged or divorced or with whom he has formed a civil partnership that has not been dissolved, nor any child or young person who is or had been a member of that person's family; and

(b) the payment is made either;
   (i) to that person's parent or step-parent, or
   (ii) where that person at the date of the payment is a child, a young person or a student who has not completed his full-time education and has no parent or step-parent, to his guardian,

   but only for a period from the date of the payment until the end of the two years from that person's death.

(5) Any payment out of the estate of a person who suffered from haemophilia or who was a qualifying person, which derives from a payment under or by any of the Trusts to which sub-paragraph (1) refers, where;

   (a) that person at the date of his death (the relevant date) had no partner or former partner from whom he was not estranged or divorced or with whom he has formed a civil partnership that has not been dissolved, nor any child or young person who was or had been a member of his family; and
   (b) the payment is made either

      (i) to that person's parent or step-parent, or
      (ii) where that person at the relevant date was a child, a young person or a student who had not completed his full-time education and had no parent or step-parent, to his guardian,

      but only for a period of two years from the relevant date.

(6) In the case of a person to whom or for whose support payment referred to in this paragraph is made, any income which derives from any payment of income or capital made under or deriving from any of the Trusts.

(7) For the purposes of sub-paragraphs (2) to (6), any reference to the Trusts shall be construed as including a reference to the Fund, the Eileen Trust, MFET Limited, the Skipton Fund, the Caxton Foundation and the London Bombings Relief Charitable Fund.

27. Any housing benefit, the housing element and the limited work capability of Universal Credit. Where the assessment of Universal Credit includes a housing element and/or a limited work capability element, this will be disregarded from the Universal Credit award, where there is adequate income to do so. The remaining award amount will then be treated as income without exception.

28. Any payment made by the Secretary of State to compensate for the loss (in whole or in part) of entitlement to housing benefit.

29. (1) Any payment of child maintenance made or derived from a liable relative where the child or young person in respect of whom the payment is made is a member of the applicant's family, except where the person making the payment is the applicant or the applicant's partner.

(2) In paragraph (1)
'child maintenance' means any payment towards the maintenance of a child or young person, including any payment made voluntarily and payments made under;

   (a) the Child Support Act 1991;
   (b) the Child Support (Northern Ireland) Order 1991;
   (c) a court order;
   (d) a consent order;
   (e) a maintenance agreement registered for execution in the Books of Council and Session or the sheriff court books;

'liable relative' means a person listed in regulation 54 (interpretation) of the Income Support (General) Regulations 1987, other than a person falling within sub-paragraph (d) of that definition.

30. Any discretionary housing payment paid pursuant to regulation 2(1) of the Discretionary Financial Assistance Regulations 2001.

31. (1) Any payment made by a local authority or by the Welsh Ministers to or on behalf of the applicant or his partner relating to a service which is provided to develop or sustain the capacity of the applicant or his partner to live independently in his accommodation.

32. Any payment of child benefit.

33. If the Government announce increases to welfare benefits in year, after the council tax support scheme has been approved, the Council reserves the right to be able to disregard these increases in income to ensure that applicants continue to receive the intended level of support.

Schedule 3

Disabled child additional disregard

1. An additional disregard of £200 per week will be applied to the total income of the claimant and partner(s) for each disabled child or young person whom the claimant or a partner is responsible and who is a member of the claimant's household. The child or young person -

(i) is in receipt of disability living allowance or is no longer in receipt of such allowance because they are a patient, provided that that the child or young person continues to be a member of the family, or
(ii) is blind or treated as blind, or
(iii) is a child or young person in respect of whom section 145A of the Act (entitlement to child benefit after death of child or qualifying young person) applies for the purposes of entitlement to child benefit but only for the period prescribed under that section, or
(iv) is a young person who is in receipt of personal independence payment or who would, but for payment ceasing by virtue of regulations made under section 86(1) (hospital in-patients) of the 2012 Act be so in receipt, provided that the young person continues to be a member of the family, or
(v) is a young person who is in receipt of armed forces independence payment.

Schedule 4

Capital to be disregarded

1. The dwelling together with any garage, garden and outbuildings, normally occupied by the applicant as his home including any premises not so occupied which it is impracticable or unreasonable to sell separately, in particular 5, in Scotland, any croft land on which the dwelling is situated; but, notwithstanding section 15 (calculation of income and capital of members of applicant's family and of polygamous marriage), only one dwelling shall be disregarded under this paragraph.

2. Any payment made to the applicant in respect of travel or other expenses incurred, or to be incurred, by him in respect of his participation in the Mandatory Work Activity Scheme but only for 52 weeks beginning with the date of receipt of the payment.

3. Any payment made to the applicant in respect of any travel or other expenses incurred, or to be incurred, by him in respect of his participation in the Employment, Skills and Enterprise Scheme but only for 52 weeks beginning with the date of receipt of the payment.

4. Any premises acquired for occupation by the applicant, which he intends to occupy as his home within 26 weeks of the date of acquisition or such longer period as is reasonable in the circumstances to enable the applicant to obtain possession and commence occupation of the premises.

5. Any sum directly attributable to the proceeds of sale of any premises formerly occupied by the applicant as his home which is to be used for the purchase of other premises intended for such occupation within 26 weeks of the date of sale or such longer period as is reasonable in the circumstances to enable the applicant to complete the purchase.

6. Any premises occupied in whole or in part-

(a) by a partner or relative of a single applicant or any member of the family as his home where that person has attained the qualifying age for state pension credit or is incapacitated;
(b) by the former partner of the applicant as his home; but this provision shall not apply where the former partner is a person from whom the applicant is estranged or divorced or with whom he had formed a civil partnership that has been dissolved.

7. Where the applicant is on income support, an income-based jobseeker's allowance or an income-related employment and support allowance, the whole of his capital.

8. Where the applicant is a member of a joint-claim couple for the purposes of the Jobseekers Act 1995 and his partner is on income-based jobseeker's allowance, the whole of the applicant's capital.

9. Any future interest in property of any kind, other than land or premises in respect of which the applicant has granted a subsisting lease or tenancy, including sub-leases or sub-tenancies.

10. (1) The assets of any business owned in whole or in part by the applicant and for the purposes of which he is engaged as a self-employed earner, or if he has ceased to be so engaged, for such period as may be reasonable in the circumstances to allow for disposal of any such asset.

(2) The assets of any business owned in whole or in part by the applicant where-

(a) he is not engaged as a self-employed earner in that business by reason of some disease or bodily or mental disablement; but
(b) he intends to become engaged or, as the case may be, re-engaged as a self-employed earner in that business as soon as he recovers or is able to become engaged or re-engaged in that business;

for a period of 26 weeks from the date on which the claim for council tax support is made, or is treated as made, or, if it is unreasonable to expect him to become engaged or re-engaged in that business within that period, for such longer period as is reasonable in the circumstances to enable him to become so engaged or re-engaged.

(3) In the case of a person who is receiving assistance under the self-employment route, the assets acquired by that person for the purpose of establishing or carrying on the commercial activity in respect of which such assistance is being received.

(4) In the case of a person who has ceased carrying on the commercial activity in respect of which assistance was received as specified in sub-paragraph (3), the assets relating to that

activity for such period as may be he circumstances to allow for disposal of any such asset.

11. (1) Subject to sub-paragraph (2), any arrears of, or any concessionary payment made to compensate for arrears due to the non-payment of;

(a) any payment specified in paragraphs 7, 9 or 10 of Schedule 4;
(b) an income-related benefit under Part 7 of the Act;
(c) an income-based jobseeker's allowance;
(d) any discretionary housing payment paid pursuant to regulation 2(1) of the Discretionary Financial Assistance Regulations 2001;
(e) working tax credit and child tax credit
(f) an income-related employment and support allowance

but only for a period of 52 weeks from the date of the receipt of arrears or of the concessionary payment.

(g) Universal Credit regulations 2013(b)

(2) In a case where the total of any arrears and, if appropriate, any concessionary payment referred to in sub-paragraph (1) relating to one of the specified payments, benefits or allowances amounts to £5,000 or more (referred to in this sub-paragraph and in sub-paragraph (3) as 'the relevant sum') and is

(a) paid in order to rectify or to compensate for, an official error as defined in regulation 1(2) of the Decisions and Appeals Regulations; and
(b) received by the applicant in full on or after 14 October 2001;

sub-paragraph (1) shall have effect in relation to such arrears or concessionary payment either for a period of 52 weeks from the date of receipt, or, if the relevant sum is received in its entirety during the award of council tax support, for the remainder of that award if that is a longer period.

(2) For the purposes of sub-paragraph (2), 'the award of council tax support' means-
(a) the award in which the relevant sum is first received (or the first part thereof where it is paid in more than one instalment); and
(b) where that award is followed by one or more further awards which, or each of which, begins immediately after the end of the previous award, such further award provided that for that further award the applicant;
(i) is the person who received the relevant sum; or
(ii) is the partner of the person who received the relevant sum, or was that person's partner at the date of his death.

12. Any sum
(a) paid to the applicant in consequence of damage to, or loss of the home or any personal possession and intended for its repair or replacement; or
(b) acquired by the applicant (whether as a loan or otherwise) on the express condition that it is used for effecting essential repairs or improvement to the home, which is to be used for the intended purpose, for a period of 26 weeks from the date on which it was so paid or acquired or such longer period as is reasonable in the circumstances to effect the repairs, replacements or improvement.

13. Any sum-
(a) deposited with a housing association as defined in section 1(1) of the Housing Associations Act 1985 or section 338(1) of the Housing (Scotland) Act 1987 as a condition of occupying the home;
(b) which was so deposited and which is to be used for the purchase of another home,

for the period of 26 weeks or such longer period as may be reasonable in the circumstances to enable the applicant to complete the purchase.

14. Any personal possessions except those that have been acquired by the applicant with the intention of reducing his capital in order to secure entitlement to council tax support or to increase the amount of that support.

i. The value of the right to receive any income under an annuity or the surrender value (if any) of such an annuity.

15. Where the funds of a trust are derived from a payment made in consequence of a personal injury to the applicant or applicant's partner, the value of the trust fund and the value of the right to receive any payment under that trust.

16. (1) Any payment made to the applicant or the applicant's partner in consequence of any personal injury to the applicant or, as the case may be, the applicant's partner.

(2) But sub-paragraph (1)

(a) applies only for the period of 52 weeks beginning with the day on which the applicant first receives any payment in consequence of that personal injury;
(b) does not apply to any subsequent payment made to him in consequence of that injury (whether it is made by the same person or another);
(c) ceases to apply to the payment or any part of the payment from the day on which the applicant no longer possesses it;
(d) does not apply to any payment from a trust where the funds of the trust are derived from a payment made in consequence of any personal injury to the applicant.

(3) For the purposes of sub-paragraph (2)(c), the circumstances in which an applicant no longer possesses a payment or a part of it include where the applicant has used a payment or part of it to purchase an asset.

(4) References in sub-paragraphs (2) and (3) to the applicant are to be construed as including references to his partner (where applicable).

17. The value of the right to receive any income under a life interest or from a life rent.

18. The surrender value of any policy of life insurance.

19. Where any payment of capital falls to be made by instalments, the value of the right to receive any outstanding instalments.

20. Any payment made by a local authority in accordance with section 17, 23B, 23C or 24A of the Children Act 1989 or, as the case may be, of section 12 of the Social Work (Scotland) Act 1968 or sections 22, 29 or 30 of the Children (Scotland) Act 1995 (provision of services for children and their families and advice and assistance to certain children).

21. (1) Subject to sub-paragraph (2), any payment (or part of a payment) made by a local authority in accordance with section 23C of the Children Act 1989 or section 29 of the Children (Scotland) Act 1995 (local authorities' duty to promote welfare of children and powers to grant financial assistance to persons in, or formerly in, their care) to a person ('A') which A passes on to the applicant.

(2) Sub-paragraph (1) applies only where A;
(a) was formerly in the applicant's care, and
(b) is aged 18 or over, and
(c) continues to live with the applicant.

22. Any social fund payment made pursuant to Part 8 of the Act.

23. Any refund of tax which falls to be deducted under section 369 of the Income and Corporation Taxes Act 1988 (deduction of tax from certain loan interest) on a payment of relevant loan interest

for the purpose of acquiring an interest iarrying out repairs or improvements to the home.

24. Any capital which, by virtue of sections 28 or 48 (capital treated as income, treatment of student loans) is to be treated as income.

25. Where any payment of capital is made in a currency other than sterling, any banking charge or commission payable in converting that payment into sterling.

26. (1) Any payment made under or by the Trusts, the Fund, the Eileen Trust, MFET Limited, the Independent Living Fund (2006), the Skipton Fund, the Caxton Foundation or the Charitable Fund.

(2) Any payment by or on behalf of a person who is suffering or who suffered from haemophilia or who is or was a qualifying person, which derives from a payment made under or by any of the Trusts to which sub-paragraph (1) refers and which is made to or for the benefits of-

(a) that person's partner or former partner from whom he is not, or where that person has died was not, estranged or divorced or with whom he has formed a civil partnership that has not been dissolved or, where that person has died, had not been dissolved at the time of that person's death;
(b) any child who is a member of that person's family or who was such a member and who is a member of the applicant's family; or
(c) any young person who is a member of that person's family or who was such a member and who is a member of the applicant's family.

(2) Any payment by or on behalf of the partner or former partner of a person who is suffering or who suffered from haemophilia or who is or was a qualifying person provided that the partner or former partner and that person are not, or if either of them has died were not, estranged or divorced or, where the partner or former partner and that person have formed a civil partnership, the civil partnership has not been dissolved or, if either of them has died, had not been dissolved at the time of the death, which derives from a payment made under or by any of the Trusts to which sub-paragraph (1) refers and which is made to or for the benefit of-

(a) the person who is suffering from haemophilia or who is a qualifying person;
(b) any child who is a member of that person's family or was such a member and who is a member of the applicant's family; or
(c) any young person who is a member of that person's family or who was such a member and who is a member of the applicant's family.

(3) Any payment by a person who is suffering from haemophilia or who is a qualifying person, which derives from a payment under or by any of the Trusts to which sub-paragraph (1) refers, where-

(a) that person has no partner or former partner from whom he is not estranged or divorced or with whom he has formed a civil partnership that has not been dissolved, nor any child or young person who is or had been a member of that person's family; and
(b) the payment is made either;
  (i) to that person's parent or step-parent; or
  (ii) where that person at the date of the payment is a child, a young person or a student who has not completed his full-time education and has no parent or step-parent, to his guardian,

but only for a period from the date of the payment until the end of two years from that person's death.

(4) Any payment out of the estate of a person who suffered from haemophilia or who was a qualifying person, which derives from a payment under or any of the Trusts to which sub-paragraph (1) refers, where

(a) that person at the date of his relevant date) had no partner or former partner from whom he was not estranged or divorced or with whom he had formed a civil partnership that had not been dissolved, nor any child or young person who was or had been a member of his family; and

(b) the payment is made either;

(i) to that person's parent or step-parent; or

(ii) where that person at the relevant date was a child, a young person or a student who had not completed his full-time education and had no parent or step-parent, to his guardian,

but only for a period of two years from the relevant date.

(6) In the case of a person to whom or for whose support payment referred to in this paragraph is made, any capital resource which derives from any payment of income or capital made under or deriving from any of the Trusts.

(7) For the purposes of sub-paragraphs (2) to (6), any reference to the Trusts shall be construed as including a reference to the Fund, the Eileen Trust, MFET Limited, the Skipton Fund, the Caxton Foundation and the London Bombings Relief Charitable Fund.

27. (1) Where an applicant has ceased to occupy what was formerly the dwelling occupied as the home following his estrangement or divorce from, or dissolution of his civil partnership with, his former partner, that dwelling for a period of 26 weeks from the date on which he ceased to occupy that dwelling or, where the dwelling is occupied as the home by the former partner who is a lone parent, for so long as it is so occupied.

(2) In this paragraph 'dwelling' includes any garage, garden and outbuildings, which were formerly occupied by the applicant as his home and any premises not so occupied which it is impracticable or unreasonable to sell separately, in particular, in Scotland, any croft land on which the dwelling is situated.

28. Any premises where the applicant is taking reasonable steps to dispose of those premises, for a period of 26 weeks from the date on which he first took such steps, or such longer period as is reasonable in the circumstances to enable him to dispose of those premises.

29. Any premises which the applicant intends to occupy as his home, and in respect of which he is taking steps to obtain possession and has sought legal advice, or has commenced legal proceedings, with a view to obtaining possession, for a period of 26 weeks from the date on which he first sought such advice or first commenced such proceedings whichever is the earlier, or such longer period as is reasonable in the circumstances to enable him to obtain possession and commence occupation of those premises.

30. Any premises which the applicant intends to occupy as his home to which essential repairs or alterations are required in order to render them fit for such occupation, for a period of 26 weeks from the date on which the applicant first takes steps to effect those repairs or alterations, or such longer period as is necessary to enable those repairs or alterations to be carried out.

31. Any payment made by the Secretary of State to compensate for the loss (in whole or in part) of entitlement to housing benefit.

32. The value of the right to receive an occupational or personal pension.

33. The value of any funds held under a personal pension scheme.

34. The value of the right to receive any rent except where the applicant has a reversionary interest in the property in respect of which rent is due.

35. Any payment in kind made by a charity or under or by the Trusts, the Fund, MFET Limited, the Skipton Fund, the Caxton Foundation or the Independent Living Fund (2006).

36. Any payment made pursuant to section ct or section 2 of the Enterprise and New Towns (Scotland) Act 1990, but only for the period of 52 weeks beginning on the date of receipt of the payment.

37. Any payment in consequence of a reduction of council tax under section 13 or, as the case may be, section 80 of the Local Government Finance Act 1992 (reduction of liability for council tax), but only for a period of 52 weeks from the date of the receipt of the payment.

38. Any grant made in accordance with a scheme made under section 129 of the Housing Act 1988 or section 66 of the housing (Scotland) Act 1988 (schemes for payments to assist local housing authority and local authority tenants to obtain other accommodation) which is to be used-

(a) to purchase premises intended for occupation as his home; or
(b) to carry out repairs or alterations which are required to render premises fit for occupation as his home,

for a period of 26 weeks from the date on which he received such a grant or such longer period as is reasonable in the circumstances to enable the purchase, repairs or alterations to be completed and the applicant to commence occupation of those premises as his home.

39. Any arrears of supplementary pension which is disregarded under paragraph 53 of Schedule 4 (sums to be disregarded in the calculation of income other than earnings) or of any amount which is disregarded under paragraph 54 or 55 of that Schedule, but only for a period of 52 weeks from the date of receipt of the arrears.

40. (1) Any payment or repayment made-

(a) as respects England, under regulation 5, 6 or 12 of the National Health Service (Travel Expenses and Remission of Charges) Regulations 2003 (travelling expenses and health service supplies);
(b) as respects Wales, under regulation 5, 6 or 11 of the National Health Service (Travelling Expenses and Remission of Charges) (Wales) Regulations 2007 (travelling expenses and health service supplies);
(c) as respects Scotland, under regulation 3, 5 or 11 of the National Health Service (Travelling Expenses and Remission of Charges) (Scotland) (No 2) Regulations 2003 (travelling expenses and health service supplies),

but only for a period of 52 weeks from the date of receipt of the payment or repayment.

(2) Any payment or repayment made by the Secretary of State for Health, the Scottish Ministers or the Welsh Ministers, which is analogous to a payment, or repayment mentioned in sub-paragraph (1), but only for a period of 52 weeks from the date of the receipt of the payment or repayment.

41. Any payment made to such persons entitled to receive benefits as may be determined by or under a scheme made pursuant to section 13 of the Social Security Act 1988 in lieu of vouchers or similar arrangements in connection with the provision of those benefits (including payments made in place of healthy start vouchers, milk tokens or the supply of vitamins), but only for a period of 52 weeks from the date of receipt of the payment.

42. Any payment made under Part 8A of the Act (entitlement to health in pregnancy grant).

43. Any payment made either by the Secretary of State for Justice or by Scottish Ministers under a scheme established to assist relatives and other persons to visit persons in custody, but only for a period of 52 weeks from the date of the receipt of the payment.

44. Any payment (other than a training allowance) made, whether by the Secretary of State or any other person, under the Disabled Persons (Employment) Act 1944 to assist disabled persons to obtain or retain employment despite their disability.

45. Any payment made by a local authority under the Disabled Persons (Employment) Act 1958 to homeworkers assisted under the Blind Homeworkers' Scheme.

46. (1) Any sum of capital to which sub-paragraph (2) applies and
(a) which is administered on behalf of a person by the High Court or the County Court under Rule 21.11(1) of the Civil Procedure Rules 1998 or by the Court of Protection;
(b) which can only be disposed of by order or direction of any such court; or
(c) where the person concerned is under the age of 18, which can only be disposed of by order or direction prior to that person attaining age 18.

(2) This sub-paragraph applies to a sum of capital which is derived from;

(a) an award of damages for a personal injury to that person; or
(b) compensation for the death of one or both parents where the person concerned is under the age of 18.

47. Any sum of capital administered on behalf of a person in accordance with an order made under section 13 of the Children (Scotland) Act 1995, or under Rule 36.14 of the Ordinary Cause Rules 1993 or under Rule 128 of those Rules, where such sum derives from

(a) award of damages for a personal injury to that person; or
(b) compensation for the death of one or both parents where the person concerned is under the age of 18.

48. Any payment to the applicant as holder of the Victoria Cross or George Cross.

49. In the case of a person who is receiving, or who has received, assistance under the self-employment route, any sum of capital which is acquired by that person for the purpose of establishing or carrying on the commercial activity in respect of which such assistance is or was received but only for a period of 52 weeks from the date on which that sum was acquired.

50. (1) Any payment of a sports award for a period of 26 weeks from the date of receipt of that payment except to the extent that it has been made in respect of any one or more of the items specified in sub-paragraph (2).

(2) The items specified for the purposes of sub-paragraph (1) are food, ordinary clothing or footwear, household fuel or rent of the applicant or, where the applicant is a member of a family, any other member of his family, or any council tax or water charges for which that applicant or member is liable.

(3) For the purposes of sub-paragraph (2) 'food' does not include vitamins, minerals or other special dietary supplements intended to enhance the performance of the person in the sport in respect of which the award was made.

51. (1) Any payment;

(a) by way of an education maintenance allowance made pursuant to-
(i) regulations made under section 518 of the Education Act 1996;
(ii) regulations made under section 49 or 73(f) of the Education (Scotland) Act 1980;
(iii) directions made under section 73ZA of the Education (Scotland) Act 1980 and paid under section 12(2)(c) of the Further and Higher Education (Scotland) Act 1992;
(b) corresponding to such an education maintenance allowance, made pursuant to;
(i) section 14 or section 181 of the Education Act 2002 (power of Secretary of State and National Assembly for Wales to give financial assistance for purposes related to education or childcare, and allowances in respect of education or training); or
(ii) regulations made under section 181 of that Act;
or in England, by way of financial assistance made pursuant to section 14 of the Education Act 2002.

(2) Any payment, other than a payment to which sub-paragraph (1) applies, made pursuant to;

(a) regulations made under section 518 of the Education Act 1996;
(b) regulations made under section 49 of the Education (Scotland) Act 1980; or
(c) directions made under section 73ZA of the Education (Scotland) Act 1980 and paid under section 12(2)(c) of the Further and Higher Education (Scotland) Act 1992,

in respect of a course of study attended by a child or a young person or a person who is in receipt of an education maintenance allowance or other payment made pursuant to any provision specified in sub-paragraph (1).

52. In the case of an applicant participating in an employment zone programme, any discretionary payment made by an employment zone contractor to the applicant, being a fee, grant, loan or otherwise, but only for the period of 52 weeks from the date of receipt of the payment.

53. Any arrears of subsistence allowance paid as a lump sum but only for the period of 52 weeks from the date of receipt of the payment.

54. Where an ex-gratia payment of £10,000 has been made by the Secretary of State on or after 1 February 2001 in consequence of the imprisonment or interment of-

(a) the applicant;
(b) the applicant's partner;
(c) the applicant's deceased spouse or deceased civil partner; or
(d) the applicant's partner's deceased spouse or deceased civil partner;
by the Japanese during the Second World War, £10,000.

55. (1) Subject to sub-paragraph (2), the amount of any trust payment made to an applicant or a member of an applicant's family who is

(a) a diagnosed person;
(b) the diagnosed person's partner or the person who was the diagnosed person's partner at the date of the diagnosed person's death;
(c) a parent of a diagnosed person, a person acting in place of the diagnosed person's parents or a person who was so acting at the date of the diagnosed person's death; or
(d) a member of the diagnosed person's family (other than his partner) or a person who was a member of the diagnosed person's family (other than his partner) at the date of the diagnosed person's death.

(2) Where a trust payment is made to;

(a) a person referred to in sub-paragraph (1)(a) or (b), that sub-paragraph shall apply for the period beginning on the date on which the trust payment is made and ending on the date on which that person dies;
(b) a person referred to in sub-paragraph (1)(c), that sub-paragraph shall apply for the period beginning on the date on which the trust payment is made and ending two years after that date;
(c) a person referred to in sub-paragraph (1)(d), that sub-paragraph shall apply for the period beginning on the date on which the trust payment is made and ending-
(i) two years after that date; or
(ii) on the day before the day on which that person-
(aa) ceases receiving full-time education; or
(bb) attains the age of 20,
whichever is latest.

(3) Subject to sub-paragraph (4), the amount of any payment by a person to whom a trust payment has been made or of any payment out of the estate of a person to whom a trust payment has been made, which is made to an applicant or a member of an applicant's family who is-

(a) the diagnosed person's partner who was the diagnosed person's partner at the date of the diagnosed person's death;
(b) a parent of a diagnosed person, a person acting in place of the diagnosed person's parents or a person who was so acting at the date of the diagnosed person's death; or
(c) a member of the diagnosed person's family (other than his partner) or a person who was a member of the diagnosed person's family (other than his partner) at the date of the diagnosed person's death,

but only to the extent that such payments do not exceed the total amount of any trust payments made to that person.

(4) Where a payment as referred to in sub-paragraph (3) is made to-

(a) a person referred to in sub-paragraph (3)(a), that subparagraph shall apply for the period beginning on the date on which that payment is made and ending on the date on which that person dies;
(b) a person referred to in sub-paragraph (3)(b), that sub-paragraph shall apply for the period beginning on the date on which that payment is made and ending two years after that date; or
(c) person referred to in sub-paragraph (3)(c), that sub-paragraph shall apply for the period beginning on the date on which that payment is made and ending-
(i) two years after that date; or
(ii) on the day before the day on which that person
(aa) ceases receiving full-time education; or
(bb) attains

whichever is the latest.

(5) In this paragraph, a reference to a person-

(a) being the diagnosed person's partner;
(b) being a member of a diagnosed person's family;
(c) acting in place of the diagnosed person's parents,

at the date of the diagnosed person's death shall include a person who would have been such a person or a person who would have been so acting, but for the diagnosed person residing in a care home, an Abbeyfield Home or an independent hospital on that date.

(6) In this paragraph-
'diagnosed person' means a person who has been diagnosed as suffering from, or who, after his death, has been diagnosed as having suffered from, variant Creutzfeld-Jacob disease;
'relevant trust' means a trust established our of funds provided by the Secretary of State in respect of persons who suffered, or who are suffering, from variant Creutzfeld-Jacob disease for the benefit of persons eligible for payments in accordance with its provisions;
'trust payment' means a payment under a relevant trust.

56. The amount of any payment, other than a war pension, to compensate for the fact that the applicant, the applicant's partner, the applicant's deceased spouse or deceased civil partner or the applicant's partner's deceased spouse or deceased civil partner

(a) was a slave labourer or a forced labourer;
(b) had suffered property loss or had suffered personal injury; or
(c) was a parent of a child who died,

during the Second World War.

57. (1) Any payment made by a local authority, or by the Welsh Ministers, to or on behalf of the applicant or his partner relating to a service, which is provided to develop or sustain the capacity of the applicant or his partner to live independently in his accommodation.

(2) For the purposes of sub-paragraph (1) 'local authority' includes in England a county council.

58. Any payment made under regulations made under section 57 of the Health and Social Care Act 2001 or under section 12B of the Social Work (Scotland) Act 1968, or under section 12A to 12D of the National Health Service Act 2006 (direct payments for health care).

59. Any payment made to the applicant pursuant to regulations under section 2(6)(b), 3 or 4 of the Adoption and Children Act 2002.

60. Any payment made to the applicant in accordance with regulations made pursuant to section 14F of the Children Act 1989 (special guardianship support services).

61. Any payments to an applicant made under section 49 of the Children and Families Act 2014(a) (personal budgets and direct payments)

This page is intentionally left blank

Summary of council tax support scheme 2026-27

The council tax support scheme from 1 April 2026 for working age people will continue to be based on income bands.

The scheme will apply to working age people only who currently receive council tax support or apply in the future for help to have their council tax discounted. The new scheme will apply without exception from 1 April 2026.

It is important to note that changes to the council tax support scheme will not affect pensioners. These people are protected and their council tax support will continue to be awarded on the basis of the scheme prescribed by Central Government.

The following income bands will apply and the percentage of council tax support awarded will be 100%, 80%, 60%, 40% or 20% of the maximum eligible council tax.

There are different bands for single claimants, lone parents, couples and for people with children as illustrated below.

Income bands to be updated after DWP notify new allowances from April 2026

Income Band	Single person	Couple	Lone parent with children	Couple with children	Maximum percentage entitlement
	Income £				
Band 1	0.00 to 110.00	0.00 to 168.00	0.00 to 220.00	0.00 to 280.00	100%
Band 2	110.01 to 150.00	168.01 to 220.00	220.01 to 270.00	280.01 to 340.00	80%
Band 3	150.01 to 180.00	220.01 to 275.00	270.01 to 320.00	340.01 to 400.00	60%
Band 4	180.01 to 210.00	275.01 to 335.00	320.01 to 370.00	400.01 to 460.00	40%
Band 5	210.01 to 240.00	335.01 to 400.00	370.01 to 430.00	460.01 to 530.00	20%

Claimants who receive Income Support, Job Seeker's Allowance (Income Based) or Employment and Support Allowance (Income Related) will fall into band 1 and will be entitled to up to 100% council tax support.

The income will be calculated, net of any allowable disregards and the if the income calculated falls into one of the following income bands, council tax support will be payable. If the net income exceeds the maximum income in band 5 then no council tax support will be payable.

Qualifying for council tax support

A person must have a council tax liability to be able to claim council tax support and the property must be occupied by the tax payer. Council tax support is a council tax discount and if awarded it will reduce a person's council tax payments. The level of discount awarded is based on the income and capital the claimant and partner has, whether they have dependent children or other grown ups living in the household, referred to as non dependants. Other factors such as certain expenses to assist with childcare payments, disabilities and whether a person falls into a group considered to require more support will also be taken into consideration.

Eligible Council Tax

The eligible council tax used in the calculation of council tax support will be the net amount payable, taking into account discounts already awarded, for a dwelling that is occupied.

The only exception to this is if the tax payer lives in a property that has an F, G or H banding. For people claiming council tax support, their maximum eligible council tax will be restricted to a band E and the maximum council tax support they can receive is 100% of the band E charge.

Capital limit

If a single person or couple claiming council tax support have over £6,000 in combined capital there will be no entitlement to council tax support and the full amount of council tax will be payable. There are no exceptions to this rule. An assumed income from savings will not be applied to capital less than £6,000.

Non dependant deductions

A non dependant is a person living in the council tax support claimant's home but they are not stated as a liable person on the council tax bill. They are normally a grown up child or an elderly relative living with the claimant. Deductions will normally be made from the eligible council tax for each non dependant living in the household. The deductions are based on the non dependant's gross income and whether they are working. The deductions and earnings bands are increased from 1 April each year.

A non dependant deduction will not be made if the claimant or their partner receives one of the following incomes:

- Attendance Allowance or Constant Attendance Allowance
- The daily living component of Personal Independence Payment
- The care component of Disability Living Allowance
- An armed forces independence payment

Or if the claimant or partner is severely sight impaired, blind or has recently regained sight.

Earned income disregards

A maximum weekly disregard of £10 will apply to the combined earnings of the claimant and partner. If both a claimant and their partner are working the earnings disregard will be £10 in total and will not be awarded per person.

Income disregards – child benefit

Child benefit for all children will be disregarded in full and will not be used in the income calculation.

Income disregards – maintenance in respect of a child

Maintenance payments received in respect of a child or children will be disregarded in full and will not be used in the income calculation, subject to qualifying conditions.

Income disregards - Housing Element (Universal Credit)

The housing costs element of a person's Universal Credit award will be disregarded in full.
* Please see examples at the end of this document.

Income disregards – other income

Under this scheme, as part of our ongoing commitment to support disabled people, the following incomes will continue to be disregarded and will not be used as income in the calculation of council tax support:

- Personal Independence Payment
- Attendance Allowance
- Constant Attendance Allowance
- Disability Living Allowance
- Limited Work Capability element of Universal Credit
- War Disablement Pension
- War Widow's Pension
- Christmas bonus paid by DWP
- Employment & Support Allowance – work related and support (non UC recipients only)

Other disregards - childcare

To support incentives to work for those working over 16 hours, a weekly childcare disregard will be applied to earnings of up to a maximum of £175, where child care is paid for one child, or up to a maximum of £300 where childcare is paid for more than one child, subject to further qualifying conditions.

Other disregards - disabled child or children (increase from 01/04/26)

An additional income disregard of £200 per week will be applied to household income for each child who:

- Is severely sight impaired, blind or has recently regained their sight, or
- Receives Personal Independence Payment or Disability Living Allowance

Other disregards – Armed Forces Compensation Scheme payments

Absences abroad for up to four weeks

Council tax support will be paid during a temporary absence abroad providing that the period of the absence does not exceed four weeks. If the planned period of absence is greater than four weeks the claim for council tax support will end from the date of departure and the claimant will have to claim again following the return to their home address.

Backdating claims

A claim for council tax support can be backdated for a maximum period of six months from the date of the claim if the claimant can demonstrate a good reason for not having claimed sooner. The claimant must provide a written request for backdated council tax support and provide full reasons for the delay in claiming.

Discretionary Hardship Relief Scheme

The scheme may result in some claimants being adversely affected which may lead to hardship. As there is a need to protect the most vulnerable households, the Discretionary Hardship Relief scheme which falls within the local council tax support scheme, is designed to provide additional financial support to those tax payers who are facing either exceptional hardship or extraordinary circumstances. Subject to conditions a tax payer could be awarded a payment under the Council's Discretionary Hardship Relief scheme. An application will need to be made and it will be considered in accordance with the Council's policy.

* Examples relating to the disregard of the Housing Element within Universal Credit:

The housing costs element of a person's Universal Credit award will be disregarded in full up to the level of the Net UC award.

Example 1

Universal Credit Maximum Amount		Universal Credit Incomes	
Standard Allowance	368.74	Net UC Award	848.74
Carer Element		Tariff Income	
Limited work capability		Household Earnings	
Child Element		Applicable Income	
Childcare Element		Other adjustments	
Housing Element	480.00		

Therefore the person's income to be taken into account for the purpose of the banded scheme is £848.74 - £480.00 (Housing Element) = £368.74 pcm or £85.09 per week.

Example 2

Where the UC award is subject to a managed payment direct to a landlord and this is included as an "other adjustment", the Net UC award will be aggregated with the managed payment as follows:

Universal Credit Maximum Amount		Universal Credit Incomes	
Standard Allowance	368.74	Net UC Award	848.74
Carer Element		Tariff Income	
Limited work capability		Household Earnings	

Child Element		Applicable Income	
Childcare Element		Other adjustments	320.00
Housing Element	480.00		

Therefore the person's income to be taken into account for the purpose of the banded scheme is £368.74 + £480.00 = £848.74 - £480.00 (Housing Element) = £368.74 pcm or £85.09 per week.

Example 3

Sometimes the value of the Net UC Award and the managed payment will be less than the Housing Element. In these instances the Housing Element will be disregarded up to the value of the Net UC Award and the managed payment.

Universal Credit Maximum Amount		Universal Credit Incomes	
Standard Allowance	368.74	Net UC Award	123.93
Carer Element		Tariff Income	
Limited work capability		Household Earnings	724.81
Child Element		Applicable Income	
Childcare Element		Other adjustments	
Housing Element	480.00		

Therefore the person's income to be taken into account for the purpose of the banded scheme will be £123.93 - £480.00 (Housing Element) = £NIL + £724.81 wages pcm or £167.26 per week (less the standard earnings disregard).

* Example relating to the disregard of the Housing Element and Limited Work Capability element within Universal Credit:

Example 4

Universal Credit Maximum Amount		Universal Credit Incomes	
Standard Allowance	368.74	Net UC Award	1238.80
Carer Element		Tariff Income	
Limited work capability	390.06	Household Earnings	
Child Element		Applicable Income	
Childcare Element		Other adjustments	
Housing Element	480.00		

Therefore the person's income to be taken into account for the purpose of the banded scheme is £368.74 + £390.06 + £480.00 = £1238.80 - £390.06 (Limited Work Capability element) - £480.00 (Housing Element) = £368.74 pcm or £85.09 per week.

These are the exceptions and all other elements of Universal Credit will be taken fully into account as income.

This page is intentionally left blank